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AFFIDAVIT OF JOHN SLOYAN

STATE OF MASSACHUSETTS §

COUNTY OF Suffolk §

BEFORE ME, the undersigned authority, on this day personally appeared John Sloyan who, having been placed under oath by me, did depose as follows:

"My name is John Sloyan. I am of legal age and a resident of the State of Massachusetts. Cutlass Solar LLC's operating personnel are familiar with Advanced Power - Cutlass Storage Project Emergency Operations Plan (WTS-PGCEOP-1.0 Emergency Operations Plan) (the "EOP") and are familiar with their duties contained therein. The relevant Cutlass Solar LLC operating staff, and its senior management are committed to following the EOP, and to the extent that deviations are required, they must be appropriate for the operating conditions during the course of the emergency. The EOP has been reviewed and approved by the appropriate executives. Drills have been conducted to the extent required by the EOP. The EOP or an appropriate summary has been distributed to local jurisdictions as needed. Cutlass Solar LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident. Cutlass Solar LLC'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, IS-200, IS-700, and IS-800 National Incident Management System training."

John Sloyan

SUBSCRIBED AND SWORN to before me on this 27th day of February, 2023.

NOTARY PUBLIC IN AND FOR
THE STATE OF MASSACHUSETTS

Rooa Abdelrahim
Notary Public
COMMONWEALTH OF MASSACHUSETTS
My Commission Expires
June 16, 2028

AFFIDAVIT OF JOHN SLOYAN

STATE OF MASSACHUSETTS §

COUNTY OF Suffolk §

BEFORE ME, the undersigned authority, on this day personally appeared John Sloyan who, having been placed under oath by me, did depose as follows:

"My name is John Sloyan. I am of legal age and a resident of the State of Massachusetts. The Cutlass Solar Project as a solar photovoltaic generation facility, does not utilize water to generate power and therefore measures for addressing supply shortages of water used in the generation of electricity are not applicable."

John Sloyan

SUBSCRIBED AND SWORN to before me on this 27th day of February, 2023.

NOTARY PUBLIC IN AND FOR
THE STATE OF MASSACHUSETTS

Rooa Abdelrahim
Notary Public
COMMONWEALTH OF MASSACHUSETTS
My Commission Expires
June 16, 2028

AFFIDAVIT OF JOHN SLOYAN

STATE OF MASSACHUSETTS §

COUNTY OF Suffolk §

BEFORE ME, the undersigned authority, on this day personally appeared John Sloyan who, having been placed under oath by me, did depose as follows:

"My name is John Sloyan. I am of legal age and a resident of the State of Massachusetts. The Cutlass Solar Project, as a solar photovoltaic generation facility, is not able to utilize alternative fuels, and therefore measures for securing and testing alternative fuels are not applicable."

John Sloyan

SUBSCRIBED AND SWORN to before me on this 24 day of February, 2023.

BENJAMIN ALAZARD
Notary Public, Commonwealth of Massachusetts
My Commission Expires October 10, 2025

NOTARY PUBLIC IN AND FOR
THE STATE OF MASSACHUSETTS

Cutlass Solar

Annex E-Cutlass Solar 1 - Cutlass Solar Project
General Restoration Instructions

Introduction:
When a Cutlass Solar 1 generation Facility trips offline, more than three inverters trip offline or the facility is taken offline for any reason, there will be a set of details to consider. In the case of Cutlass Solar 1 Project, consultation with third-party consultants, Tenaska Communications, ERCOT Operations staff, FERC staff, DOE, and internal operations staff may be necessary, depending on the nature of the incident that caused the solar array to go offline.

Staffing:
Depending on the reason for the outage, various Cutlass Solar 1 Project staff may be needed to address the incident. There can be many causes for loss of significant generation or be forced into an outage situation, requiring nuanced approaches to restoring power to the Facility. The following circumstances are meant to provide examples for different scenarios but is not an exhaustive list.

Operational Instruction from RC, BA, or TOP:
As a solar generation Facility, Cutlass Solar Project must comply with any Operating Instruction from ERCOT (as the BA, RC, and TOP), as well as the operational TOP. If there is a problem with complying with the Operating Instruction, Cutlass Solar Project SOLV OCC (operations) personnel must communicate this to the Transmission Operator (Tenaska (TOP)) immediately. If the Operating Instruction violates safety or may damage Facility equipment, this must be communicated to the entity issuing the Operating Instruction.

Physical damage:
If it is determined that the damage sustained by the Facility is not due to malicious and intentional damage to the Facility, normal operations checks should be conducted on the equipment, to ensure it is possible to begin generating again. This may include consultation with the major equipment OEM's, contract engineers, EPC Contractor (during Warranty Period) and internal maintenance and operations staff.

If the physical damage is determined to be a direct result of intentional damage to the Facility, please refer to Annex H - AP-CS-PGCEOP-1.0 Physical Security Plan. After completing the reporting process, communication with internal, TOP Operations Staff and ERCOT, is vital. Cutlass Solar staff should refer to restoration procedures when restoring power.

Cyber Security:
In any case that involves cyber security, threat of cyber damage, or actual damage to the Facility from a cyber security perspective, please refer to Annex G-AP-CS-PGCEOP-1.0 Cyber Security Incident Response Plan (CSIRP). Careful investigation must be carried out at the Facility to determine how to restore power.

Review and Correction:
After the incident, an in-depth review should be completed. This review should address communications best practices, actionable tasks for improvement of the procedures used for notification and operations, as well as addressing staff responses and actions. During this review, please use Attachment E in the AP-CS-PGCEOP-1.0 Emergency Operations Plan - Attachments B-E.

Annex F -Pandemic Response Plan

Cutlass Solar 1 Project

Version 1.5
Effective Date: 02/25/2023

Version	Approval Date	Effective Date	Revision Summary
1.0	01/30/2023	01/31/2023	Initial Pandemic and Epidemic Response Plan
1.5	02/25/23	02/27/2023	Update information

As of 02/25/2023, EOP Version 1.5, approved on 02/27/2023, supersedes all previous PRPs.

Table of Contents

1. EXECUTIVE SUMMARY AND APPROVAL

This Pandemic Preparedness and Response Plan 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.

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)
Eleo Castillio	Field Service Tech SOLV Energy	Maintain
Cord Ordica	Regional Lead SOLV Energy	Implement
Michael Stagliola	VP, Operations Cutlass Solar	Revise

2. SCOPE AND APPLICATION

This Pandemic Preparedness and Response Plan applies to the Cutlass Solar 1 Project and follows the requirements and recommendations for action to be taken in the event of a Pandemic illness emergency, and outlines the processes to follow to quickly recover to normal business operations.

It is intended to:

1. Provide an orderly and efficient transition from normal to emergency conditions;
2. Provide specific guidelines appropriate for complex and unpredictable occurrences;
3. Provide consistency in action;
4. Prevent activity inconsistent with the procedure;
5. Establish a threshold at which an emergency response is triggered and defines who may authorize the response.
6. Provide guidance for returning to normal operations after the Pandemic crisis clears.

3. REFERENCES AND USEFUL LINKS

Center for Disease Control (USA) Current Coronavirus Disease 2019 (COVID-19) Situation Summary

OSHA Guidance on Preparing Workplaces for an Influenza Pandemic

Centers for Disease Control Travel Updates

World Health Organization Rolling Updates on COVID - 19

4. OBJECTIVES

This Plan is intended to provide for business continuity by:

1) Defining critical operations that must be continued, those operations that can be postponed for a period of time and those operations than can be postponed indefinitely;
2) Providing a planned transition from normal operations to emergency operations, maintaining only those functions defined as critical or vital operations;
3) Providing a level of security and safety for employees;
4) Providing standards for testing the Business Continuity for Pandemic Plan;
5) Ensuring continuation of services and ensuring reliability of the system;
6) Meeting regulatory requirements imposed by local, state, and federal regulatory agencies;
7) Managing successfully through a pandemic and reducing the disruption of services.
8) Providing for rapid recovery of operations and services after a pandemic.

5. DETERMINING LEVEL OF HEALTH CRISIS

The World Health Organization included description of six Pandemic Alert Phases divided into three distinct periods in their 2019 – 2030 Global Influenza Strategy; although they specifically reference influenza pandemics, the strategy applies to the identification and control of pandemics caused by other viruses as well, including coronaviruses. The six pandemic alert phase are grouped into 3 periods: Interpandemic (low risk), Pandemic Alert (human cases reported), and the Pandemic Period (transmission to and between humans). For the purposes of this procedure, we shall introduce a fourth period: Recovery.

5.1 Phase Description

Interpandemic period
Phase 1: No new virus subtypes have been detected in humans.
Phase 2: No new virus subtypes have been detected in humans. However, a circulating animal virus subtype poses a substantial risk of human disease.

Pandemic Alert period
Phase 3: Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.
Phase 4: Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.
Phase 5: 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).

Pandemic Period
Phase 6: Pandemic: increased and sustained transmission in general population. A very crucial event in the emergence of a pandemic virus is the transition from phase 3 to phase 4, which may go much faster than previously supposed.

Recovery Period
This Period is in addition to the WHO Health Crisis Designations and refers to the after the Pandemic has abated (possibly after having gone through several cycles of severity), and businesses and sites are working towards returning to normal operations.
The designation of phases will be included in various locations throughout this plan to assist in determining appropriate responses throughout the cycle of a pandemic event. A pandemic event affects the entire world and assessment of such a global event will likely be determined by the WHO. Likewise, assessments in local or regional jurisdictions will occur as a pandemic event occurs.

6. DEFINITIONS IN THE SITE PLAN

This plan only considers the effect of a Pandemic Influenza on operations of Cutlass Solar 1 Project and outlines the way power production, if deemed critical and vital, will continue to be delivered throughout a pandemic event.

Critical parts and supplies are those parts and supplies that are necessary to maintain safe and efficient operation of the facility. These may include abatement chemicals (ammonia), water treatment chemicals, and replacement parts for critical equipment necessary to run generation or support equipment.

Critical services are those that parts and supplies that must be provided immediately to prevent injury, loss of life, or infrastructure destruction and loss of confidence in government. These services normally require resumption with 24 hours for the purposes of pandemic planning, they are the core services of the plant.

Site Pandemic Coordinator is the person at the site that the Regional Lead has designated to facilitate the development and coordination of the site Pandemic Preparedness and Response Plan. The Regional Lead will retain authority and responsibility for implementation of the Plan.

Vital services are those that must be provided within 72 hours without which loss of life or injury, infrastructure destruction loss of confidence in government and disproportionate recovery costs would likely result. For the purposes of pandemic planning, these are vital and necessary services that may be performed on a rotating schedule.

7. CRITICAL ASSUMPTIONS IN DEVELOPING THE SITE PANDEMIC PLAN

When preparing this plan, the following assumptions were considered:

1) Once a pandemic virus reaches Phase 3 (in the Pandemic Alert Period) and has been introduced to humans, it may spread rapidly, leaving little or no time to prepare if it is capable of being spread by human-to-human contact because of high levels of global traffic and the contagiousness of the disease;
2) The pandemic will be widespread with simultaneous outbreaks (it may come in waves of severity);

3) There will be shortages of healthcare, emergency and essential services personnel due to illness and absenteeism;

4) There will be severe disruption in essential services;

5) There will be shortages of equipment and supplies.

6) Peak absenteeism may reach as high as 40% (although some studies by the CDC do not expect it to exceed 20%) if the expected attack (or infection) rate is realized.

The possible impact of absenteeism of site employees and across industry as a whole should be included as a key element of the Plan because of impacts on personnel when family is affected, and the impact on the supply chain and operations; steps should be taken in advance and throughout the crisis to identify means to eliminate or reduce the impact of reduced staffing levels.

8. ELEMENTS OF THE SITE-SPECIFIC PLAN

8.1 Identifying Site Pandemic Coordinator

The Regional Lead has designated Eleo Castillio as the Pandemic Coordinator for the site. This employee will be responsible for maintaining this Plan, training site employees on the Plan, and implementing various levels of the Plan if a Global Health Crisis that may become a Pandemic is identified. This individual will coordinate as needed with the Project Manager or other designated O&M Pandemic Coordinator and Safety on Plan development and implementation.

8.2 Identifying essential personnel and emergency succession.

Site personnel identified in Attachment 1 have unique skills or duties and contingency personnel have been identified in the event that the primary cannot perform those duties. Site Pandemic Coordinator shall work with the Regional Lead and their designee to ensure that appropriately trained and experienced contingency personnel are identified and prepared to assume responsibilities. When implementing the Pandemic Plan, employees who are willing and able to remain on-site for extended periods during a Pandemic shall be identified and this should be noted on Attachment 1.

8.3 Identifying critical supplies and suppliers.

Site Management shall work with their staff, including planners, to identify and document critical supplies and components that, if unable to obtain on short notice (throughout the duration of the pandemic or beyond) could cause a disruption in operations or could cause adverse impacts to health and safety and/or environmental compliance. These shall be documented on Attachment 2 or equivalent and shall be maintained with the Pandemic Plan by the Pandemic Coordinator.

8.4 Communication Plan

The Pandemic Coordinator shall develop a Communications plan that the site can implement in the event that a Global Health Crisis or Pandemic emerges. The Plan shall

include how to get information and how to communicate information internally and across the O&M Organization, as well as who to call in the state or local government. Attachment 3 or equivalent documents the Communication Plan.

If a site employee is confirmed to have the virus and/or the virus reaches pandemic levels in areas that impact sites directly (local cases of the virus have been confirmed) or indirectly (in areas that may cause disruption of the supply chain for critical supplies and equipment), and the Pandemic affects or threatens to affect the site's ability to operate and perform its obligations under this O&M Agreement, the Sr. Regional Lead or Regional Lead shall notify the Project Manager and Legal department, who will then notify the customer within 48 of learning of such event of a potential Force Majeure. The notification shall state the nature of the event, its anticipated duration and any action being taken to avoid or minimize its effect.

8.5 Identifying applicable Non-Pharmaceutical Interventions (NPI) for the site.

The Pandemic Coordinator shall work with SOLV Management, Human Resources and O&M Safety personnel to develop NPIs that will help prevent spreading illness and the consequent disruption of operations at the site. These will include the supplies identified on Attachment 4 and shall include at a minimum:

- Providing adequate and readily available supplies of consumables needed to prevent disease transmission, including tissues, alcohol based hand sanitizer, and hand soap, as well as disposable gloves;
- Ensuring that hand washing facilities are available and adequate for the number of employees and contractors on site.
- Providing posters showing proper hand washing techniques in restrooms and employee break areas;
- Developing provisions for relaxing or extending sick leave policies to allow adequate time for employees to recover from any pandemic virus type symptoms away from work (HR will provide guidelines).
- Provisions for social distancing (keeping employees at least one yard/meter away from each other) such as elimination of group meetings, spacing work stations, conducting online meetings, telecommuting, etc.
- Providing separate rooms or areas and providing facemasks for employees who show signs of illness but who may need to remain on site.
- Reverse quarantining, or limiting access of non-essential personnel to the site.
- Stocking supplies of frozen and non-perishable food and water to enable sites to self-isolate if needed for an extended period of time (one to two weeks minimum, based on circumstances).

- Identifying and stocking bedding and toiletries for employees remaining on sit for extended periods.

9. IDENTIFYING PLANT OPERATIONAL AND MAINTENANCE PROCEDURES

9.1 Accelerated Deferred Maintenance

Outages and other maintenance activities may need to be completed early or postponed due to limited availability of experienced employees and contractors, and due to lack of available parts and equipment. This site has done the following to prevent and minimize the impact of pandemic-related deferred maintenance.

- Completed all preventative maintenance in accordance with the CMMS system (SPROCKET) and schedule.
- Developed alternate plans for outage maintenance to include only critical work during the health crisis.
- Rescheduled outage work to occur sooner/later than originally planned.
- Identified sister plants with similar technology for potential equipment and labor sharing in the event of impending failures.

9.2 Slow/shut Down Procedures

The site has identified critical staffing levels that may determine reduced operating hours or full shut down, depending upon absenteeism during the Pandemic virus. These include:

- Level I Emergency (20% Absenteeism, for one (1) week):

  THE SITE will continue to operate as per usual stands with the normal compliment of operators, maintenance staff and management and frozen and non-perishable food is stocked for employee use.

- Level II Emergency (30% Absenteeism, for one (1) week)

  THE SITE will continue to operate with a minimum of (***3***) operators per shift and (***1***) maintenance personnel. The site will hire contractors to support maintenance activities if required and available and will make provisions for all available critical personnel to remain on site for up to two weeks.

- Level III Emergency (40% Absenteeism or greater, for one to two weeks)

  The Site will continue to operate with no less than two (3) operators per shift. Operators may be required to reside on-site for up to two weeks, or the duration of the pandemic.

The Site will make all attempts to continue to operate, however, in the event that the minimum required numbers of personnel are not available, THE SITE will make the decision to close down operations.

The Site will provide and maintain enough food, water, bedding, and supplies to maintain continuous habitation by up to 10 critical operations and maintenance and supplementary personnel for up to two weeks. See Attachment 5.

10. PHASED PLAN DEVELOPMENT AND ACTIVATION

This section defines actions to be taken at each Phase of the Pandemic Progression. The phases and actions are summarized in Table 1, below.

10.1 Interpandemic Phases

The site has identified a Pandemic Coordinator and maintain the site-specific Plan so that it is available for update in the event that the World Health Organization (WHO), the Centers for Disease Control (CDC) or other governmental health organization identifies a new virus that threatens to reach the Global Alert Period. The Plan shall be reviewed biennially when no Pandemic Alert is issued.

10.2 Global Health Crisis Advisory Phase

SOLV Energy Project Manager, or designee, will advise facilities when the World Health Organization (WHO), the Centers for Disease Control (CDC) or other governmental health organization identifies a new virus that threatens to reach the Global Alert Period.

When the Advisory is issued, several elements of this plan shall be initiated by the Site and other personnel as needed, including:

- The site Emergency Staffing Schedule
- Notification to the Emergency Staffing Schedule (EOP Attachment C) personnel who have unique skills or duties and contingency personnel who may back fill for them (Attachment 1)
- Identification of critical supplies and components and the supply chains available to provide them (EOP Attachment D).

10.3 Pandemic Alert, Phases 3 and 4

If and when the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 3 Health Crisis and the virus has begun spreading to humans, the site will begin to take measures to prevent transmission of the virus and to protect the continued safe operation of the site. The site will:

- Work with Human Resources to develop an interim sick leave policy that allows symptomatic employees (non-essential) to stay home until all symptoms are resolved.
- Develop work isolation plans to allow essential employees to continue working as needed.

- Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters if the supply chain is vulnerable. (EOP Attachment D)

- Identify employees who may be willing and able to remain on-site for up to two weeks if needed during a Pandemic crisis.

10.4 Pandemic Alert, Phase 5

The SOLV Regional Lead, in consultation with the Project Manager, shall have the authority to activate the Pandemic Plan (Phases 5 and 6) and shall have the authority to suspend the delivery of power production as required based on the resources available to deliver and to redeploy staff as necessary.

Once the plan has been activated, communications with staff (both at work and at home) must strive to address or assist with a wide range of concern, from questions regarding service delivery to assistance in providing information on health care and shelter-in-place suggestions.

If the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 5 Health Crisis and there are localized but large clusters of the virus identified, and/or if there are one or more confirmed case regionally, then the following additional steps will be taken

- Implement travel bans or restrictions to countries and regions where pandemic virus cases have been identified.

- Implement the interim sick leave policy that allows symptomatic employees (non-essential) to stay home until all symptoms are resolved.

- Develop work isolation plans to allow essential employees to continue working as needed.

- Develop hygiene plans that specify type area, and frequency of disinfectant cleaning at the site.

- Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters if the supply chain is vulnerable. (EOP Attachment D)

SOLV Project Manager will communicate next steps to the sites, which may include travel restrictions, adjustments in sick leave policy, etc. Communications materials including Posters, handouts, and other media may be provided across the organization at this time.

10.5 Pandemic, Phase 6:

If the Global Health Crisis reaches Pandemic Level 6, the site will implement the following as needed:

- Work related travel ban to all regions/areas where there are now clusters of Pandemic virus.
- Work isolation plan
- Disinfectant cleaning plan (see attachment 6)
- Extended habitation Plan (see list of supply requirements Attachment V).
- Maintenance Deferment plan
- Site Control from OCC Alone Plan
- Post Pandemic Start up plan (if necessary)

10.6 Fitness for Duty Policy

A **Fitness for Duty Policy** (see Attachment 7) provides guidelines on how long employees who have demonstrated they are suffering the effects of influenza should stay away from work. This period will be established once the effects of the influenza are known. The policy shall also facilitate employees returning to work once they are well. Staff will be trained in respiratory etiquette and symptom recognition.

10.7 Travel Restrictions

To contain the spread of influenza, and to protect those employees who are well, travel restrictions shall be instituted. When Pandemic Phase 4 is reached in a local area, staff shall be restricted from traveling to meetings outside their place of work. Likewise, during Phase 4 or higher, travel for any reason shall be discontinued.

Table 1 – Summary of Appropriate Site Responses Based on the Level of Health Crisis

Pandemic Alert Phase(s)	Site Response
Interpandemic Period	• Continue Normal Operations • Identify a Pandemic Coordinator • Maintain the Site Specific PPRP • Review and update every 2 years
Global Health Crisis Advisory **(Issued by the CDC/ WHO)**	• Implement the Site Communications Plan • Identify Critical Personnel and Contingency Personnel • Identify Critical Parts, Supplies, and Services and coordinate with appropriate supply chains
Pandemic Alert Period **Phases 3 and 4**	• Coordinate with HR to implement an interim sick leave policy that allows symptomatic non-Critical Employees to stay home until all symptoms are resolved. • Develop work isolation plans to allow Critical Employees to continue working as needed. • Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters. • Identify employees who may be willing and able to remain on-site for up to two weeks if needed during a Pandemic crisis.
Pandemic Alert Period **Phase 5**	• Activate the Site Specific PPRP. • Develop hygiene plans that specify type area, and frequency of disinfectant cleaning at the site. • Implement Pandemic Fitness for Duty Policy (Attachment 6) • The Regional Lead, in consultation with the Project Manager, shall have the authority to suspend the delivery of power production as required based on the resources available to deliver and to redeploy staff as necessary.
Pandemic Alert Period **Phase 6**	• Implement a Work Isolation Plan • Implement Disinfectant Cleaning Plan • Implement an Extended Habitation Plan as appropriate. • Implement a Maintenance Deferment Plan as appropriate. • Implement a Site Control from OCC Alone Plan as appropriate. • Review the Post Pandemic Start Up Plan if necessary.

11. TESTING AND MAINTAINING THE BUSINESS CONTINUITY FOR PANDEMIC PLAN

Plan testing is essential to this business Continuity for Pandemic Plan. This plan shall be tested annually and more often if needed, via a tabletop exercise, to determine if environmental changes or plan and policy changes affect this plan.

12. ATTACHMENTS

Attachment 1: Distribution Plan to Cutlass Solar 1 Project Staff (EOP Distribution list)

Attachment 2: Pre-identified Supplies and Suppliers (EOP Attachment D)

Attachment 3: Pandemic Communication Plan

Attachment 4: Supplies and Provisions for Sustained Habitation at Site

Attachment 5: Maintenance Planning and Resources

Attachment 6: Pandemic Fitness for Duty Policy

Attachment 7: Checklist for Pandemic Planning

t 8: Generation Capacity Recovery Priorities (EOP Attachment E)

Attachment 1

Primary and Contingency Personnel

*Attachment C Emergency Staffing Schedule

NAME	LOCATION	CONTACT INFORMATION	DUTIES
Michael Stagliola	Home Office (Boston,Ma)	mstagliola@advancedpowerna.com	Monitor/ Direction
Christopher Daycock	Home Office (Boston,Ma)	cdaycock@advancedpowerna.com	Monitor/ Direction
Cord Ordica	Site	cord.ordorica@solvenergy.com	Site Activities
Eleo Castillo	Site	Eleo.Castillo@Solvenergy.com	Site Activities
Cesar Castillio	Remote	cesar.castillo@solvenergy.com	Monitor/ Direction/ Site Activites
Patrick McDonald	Remote	pamcdonald@SOLVenergy.com	Monitor/ Direction/ Site Activities
Patrick Sullivan	OCC (Control Room)	psullivan@solvenergy.com	Monitor Controls/ Techncial Support & Direction
Morgan Smith	Home Office (San Diego, Ca.)	MOSMITH@solvenergy.com	Monitor/ Direction
Shannon Poulter	Site/Remote	spoulter@advancedpowerna.com	Monitor/ Direction/ Site Activites
Diana Gonzalez	Home Office (San Diego, Ca.)	Diana.Gonzalez@solvenergy.com	Provide Business Operations Support
John Coleman	Home Office (Houston, Tx)	jcoleman@advancedpowerna.com	Monitor/ Direction/ Site Activites
Dane Williams	Home Office	dwilliams@proarch.com	Business Network Sr. Administrator (IT Consultant)
Ryan Lindeman	Home Office (Houston, Tx)	Ryan.lindeman@emerson.com	SCADA System Senior field Engineer SW Regional Operations
Tenaska Communications	Home Office	tenaskacomm@tnsk.com	

*This is table is from the EOP AP-CS-PGCEOP-1.0 Attachments B-E

Attachment 2

*Pre-Identified Supplies and Suppliers for Emergency Operations

ITEM	POC	CONTACT INFO	NOTES
Diesel Gen. Fuel	Moffit Services	281-205-7577	17302 House & Hahl Rd Ste 211 Cypress, Tx
Gasoline (vehicle & portable motd	Murphy USA	281-232-2449	5334 FM-1640 Richmond, Tx
Heaters	Grainger	800-472-4643	Stafford Branch #356
Signage	Grainger	800-472-4644	Stafford Branch #357
PPE	Grainger	800-472-4645	Stafford Branch #358
Spill Kit	Grainger	800-472-4646	Stafford Branch #359
First Aid Kit	Grainger	800-472-4647	Stafford Branch #360
Bulk Water	Water Boy Bulk Water Delivery Service	512-868-7355	Cedar Park, Tx 78630
Cleaning Supplies	Grainger	800-472-4643	Stafford Branch #356
Fire Extinguisher	Grainger	800-472-4643	Stafford Branch #356
Replacment Transformer Oil	Mansfield Service Partners	713-672-4500	223 McCarthy Drive
Drinking Water	Kroger	281-232-1230	24401 Brazos Town Xing, Rosenberg, Tx
Bags of Ice (personnel)	Kroger	281-232-1230	24401 Brazos Town Xing, Rosenberg, Tx
Frozen Ice Pops (personnel)	Kroger	281-232-1230	24401 Brazos Town Xing, Rosenberg, Tx

This is table is from the EOP AP-CS-PGCEOP-1.0 Attachments B-E

Attachment 3

Pandemic Communication Plan for Cutlass Solar 1 Project

Global Health Crisis Advisory

The SOLV Energy Project Manager or designee will advise facilities when the World Health Organization (WHO), the Centers for Disease Control (CDC) or other governmental health organization identifies a new virus that threatens to reach the Global Alert Period.

Once the Advisory has been communicated, the Site Pandemic Coordinator shall notify Regional Lead and Asset Manager of the Advisory and the possible need to implement the Pandemic Response Plan at the site in the near future.

Pandemic Alert, Phases 3 and 4

If and when the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 3 Health Crisis and the virus has begun spreading to humans, the SOLV Energy Project Manager, or designee, will advise facilities support functions and Facility Asset Manager of the Alert and will begin sending out weekly communications to sites and support personnel to advise them of any updates and any required or recommended measures to prevent or mitigate impact of the virus, with more frequent calls as needed. She or he will also any immediate advisories and provide communication assistance, including access to informational materials for the sites.

When the Site Pandemic Coordinator receives the Pandemic Alert, they shall inform the Regional Lead of the Alert and the need to begin implementing site measures to prevent and/or mitigate impact in accordance with the Pandemic Preparedness and Response Plan. The site coordinator will also advise site personnel that the Pandemic Alert elements of the site Plan will be implemented.

Pandemic Alert, Phase 5

If the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 5 Health Crisis and there are localized but large clusters of the virus identified, then the SOLV Energy Project Manager will communicate next steps to the sites, which may include travel restrictions, adjustments in sick leave policy, etc. Communications materials including Posters, handouts, and other media may be provided across the organization at this time.

The Site Pandemic Coordinator shall notify all site personnel of the implementation of the Pandemic Response Plan, as well as next steps to take and watch for. He or she may post

notices and posters or hold safety meetings, as needed. Employees will be notified that any illness with symptoms the same as or similar to the pandemic virus shall be reported.

The Regional Lead shall communicate to the Project Manager that a Pandemic Alert is in place and advise them of the site Plan, next steps and the status of critical personnel and suppliers (Attachments 1 and 2) as applicable.

Any suspect or confirmed cases the pandemic virus shall immediately be communicated by the Regional Lead or Pandemic Coordinator to the Sr. Regional Lead, the Asset Manager as well as other site personnel. Local, State and Federal Health personnel shall be notified of all cases as necessary.

Pandemic, Phase 6:

If the Global Health Crisis reaches Pandemic Level 6, the site will communicate status of site personnel weekly or when any changes occur to the Project Manager, Sr. Regional Lead, The Regional Lead and the Asset Manager, as applicable.

NAME	TITLE	CONTACT INFORMATION
Michael Stagliola	VP, Operations (AP)	617-459-2060
Christopher Daycock	Manager, Techncial (AP)	617-784-8338
Cord Ordica	Regional Lead	903-249-4409
Eleo Castillo	Field Service Technician	210-790-1729
Cesar Castillio	Field Service Technician	702-786-7343
Patrick McDonald	Sr. Regional Lead	435.691.4725
Patrick Sullivan	Control Center Assistant Manager	408.348.4881
Morgan Smith	Project Manager	760-3178481
Shannon Poulter	Site Manager	435-279-5702
Diana Gonzalez	Business Operations Coordinator	619-742-6991
Rick Holtz	Bechtel Project Engineer	240-357-5446
John Coleman	Cutlass Project Manager	617-429-1020

Local, State and Federal Health Personnel:

- **Richmond Health and Human Services Fort Bend County**
  - Executive Orders of Governor Greg Abbott Related to COVID-19
  - https://www.fbchealth.org/ncov
- **Texas Department of Health and Human**
  - Services https://dshs.texas.gov/coronavirus/

- **Emergency Management Coordinator:**
  - Anthony Pryor 281-342-5456 opt.2
- **City of Richmond Fire Department**
  - Emergency: 911
  - Non-emergency 281-238-1210
  - Mike Youngblood Chief

Attachment 4

Supplies and Provisions for Sustained Habitation at Site

The site anticipates having 1 to 2 persons remain on site throughout critical absentee levels during a pandemic and will maintain the following for personnel remaining on site under Pandemic Conditions:

Bedding

- One cot or mattress for each person remaining on site.
- One sleeping bag for each person.
- One pillow for each person
- Designated room or rooms for sleeping.

Water

The site will ensure that adequate dinking and sanitary water is available for each person to remain on site. Cutlass Solar 1 Project shall ensure that they have available at least one gallon of drinking water per day (14 gallons for 2 weeks) per person remaining on site. Additional water should be planned for cleaning and other functions as necessary.

Consumables

The site will provide essentials including toothbrushes, toothpaste, tissues, soap and other personal consumables for each person remaining on site.

Food

The site will provide food for up to 14 days for each person remaining on site; foods will be a combination of frozen and no-perishable and the site will provide sanitary facilities for the preparation and consumption of food items.

Attachment 5

Upcoming Critical Maintenance and Major Maintenance Activities Scheduled

Description of Work / Probable impact of work not being done	Scheduled Dates	Name of Employee/Contractor to perform Work	Name of Alternate Person/Contractor to perform Work	Are Parts Available?	Can work be done sooner?	Can Work be Deferred?
Add Additional Sheets as Needed						

Attachment 6

Pandemic Fitness for Duty Policy

The site is committed to providing a safe work environment in the event of a pandemic and to protect the health and safety of the staff. This policy and application apply specifically to a pandemic event.

1. PURPOSE

This policy provides a procedure for identifying and intervening when staff could pose a threat to the safety of others and property as a result of having contracted an influenza virus related to the pandemic.

2. DEFINITIONS

"Fit for Duty" means able to perform the duties of the job without creating a risk of other staff contracting the influenza virus.

"Health Services Provider" is a Doctor of Medicine or other health care practitioner who is qualified to provide a medical opinion on the state of health of a staff member as it relates to the influenza virus as expected in a pandemic event.

"Regional Lead" is the person to whom a staff member reports.

3. EMPLOYEE (Field Service Technician) RESPONSIBILITIES

1) Reporting to work fit for duty;

2) Notifying the supervisor when not fit for duty;

3) Notifying the Regional Lead, when observing a co-worker who may not be fit for duty, in cases where the possibility is such that the impaired individual is the Regional Lead, the employee should make the notification to the Sr. Regional Lead.

4) Cooperating with a manager's directive and / or referral for a required medical evaluation.

4. SR REGIONAL LEAD OR REGIONAL LEAD RESPONSIBILITIES

1) Observing the attendance, performance and behavior of staff they supervise;

2) Interviewing an employee who appears to the manager as unfit for duty and referring the affected employee for a medical evaluation when appropriate;

3) Recording the reasons / observations that triggered a fitness for duty medical evaluation referral;

4) Utilizing this policy in a fair and consistent manner, respecting the employee's privacy and the confidentiality of medical information.

5. PROCEDURE

1) If the Regional Lead receives reliable information that an employee may be unfit for duty, or through personal observation believes an employee to be unfit for duty, they will validate and document the information or observations as soon as is practical. Actions that may trigger the need to evaluate an employee's fitness for duty with respect to this policy are limited to observation of influenza conditions consistent with a pandemic event.

2) The Regional Lead will present the information or observations to the employee at the earliest possible time in order to validate them and will allow the employee to respond to the concern and determine whether the employee should leave the workplace immediately for safety and health reasons.

3) The Regional Lead may direct the employee to a health services provider to assess the condition of the employee. An employee may not be allowed to return to work until such an assessment has been provided or until the Regional Lead has been satisfied that the employee is fit to return to work based on the recommendations provided by a health services provider.

4) The employee shall be responsible for the cost of any medical evaluations completed by a health services provider, if required by the employer.

5) Prior to returning to work, after recovery from an influenza virus consistent with a pandemic event, the Regional Lead shall consider advice received from the local health authorities on the length of time considered appropriate to recover from the influenza virus, and the length of time the virus remains infections.

Attachment 7

Checklist for Pandemic Planning

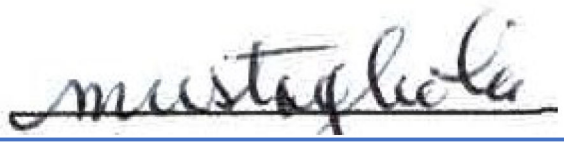
Sites may use the Checklist linked below to cross check their Pandemic Preparedness and Response Plan and to determine if additional elements should be incorporated.

https://www.cdc.gov/flu/pandemic-resources/pdf/businesschecklist.pdf

CIP-003 LOW IMPACT CYBER SECURITY RESPONSE PLAN

Cutlass Solar 1

REVISION 00

Procedure Owner	Michael Stagliola
Title	VP, Operations
Signature And Date	1/24/2023 

Revision	Description	Effective Date
rev00	Procedure created in accordance with CIP-003-8.	1/1/2023

Table of Contents

RELATED/SUPPORTING DOCUMENTS ARE HIGHLIGHTED IN RED

1. PURPOSE

The purpose of this procedure is to provide Cutlass Solar 1, NCRXXXXX (Cutlass) written guidance on how to comply with NERC Standard CIP-003, Attachment 1, Section 4 for their Low Impact BES Cyber Systems.

This procedure shall be used to develop, implement, and maintain a Cyber Security Incident Response Plan (CSIRP) to respond to Cyber Security Incidents at all NERC CIP designated Facilities owned by Cutlass.

2. APPLICABILITY

This procedure applies to the following **Cutlass's** Low Impact BES Cyber Systems.

3. RESPONSIBILITIES

Below are the roles and responsibilities associated with Cyber Security Incident Response:

- Cutlass personnel and contractors shall notify the Site Management of any actual or suspected Cyber Security Incidents.
- Site Management must:
    - Take appropriate actions to respond to Cyber Security Incidents
    - Notify the Asset Manager and CIP Senior Manager (or delegate) of all Cyber Security Incidents.
    - Coordinate with the Asset Manager and CIP Senior Manager (or delegate) on Cyber Security Incident investigation, classification, reporting, response, recovery, and mitigation.
- Security personnel and Cutlass's Technical/IT Support team shall assist in the investigation, classification, reporting, response, recovery, and mitigation of Cyber Security Incidents as requested.
- Site Management shall coordinate with the CIP Senior Manager (or delegate) and Operations Supervisor on Cyber Security Incident investigation, classification, reporting, response, recovery, and mitigation.
- CIP Senior Manager or Delegate shall:
    - Coordinate with the Site Management on Cyber Security Incident investigation, classification, reporting, response, recovery, and mitigation.
    - Ensure that a Cyber Security Incident Response Exercise is performed at least:
        - once every 36 months for sites without Medium Impact BES Cyber Systems. (**See CTS-P003 – Low Impact Methodology**) and
        - and that the Cyber Security Incident Plan is updated with any changes or updates within 60 calendar days of the change.
    - Ensure that, if need, the CSIRP is updated with 180 calendar days after completion of a Cyber Security Incident Response Plan test or action Reportable Cyber Security Incident.

4. PROCEDURE DETAILS

Identification & Classification

Cyber Security Events will typically be identified through automated system monitoring, notification, or direct observation. Refer to the "Incident Management & Classification" section (below) for examples of events that qualify as Cyber Security Incidents.

Based on the NERC glossary of terms for a Cyber Security Incident and Reportable Cyber Security Incident, Cutlass has identified the categories in the table below for incident identification. The identification of an incident is based on the outcome determined in the table below considering the BES Cyber System affected by the event.

Outcome	Incident Descriptions	Low Impact BCS Applicability?	Reportable OR Non-Reportable?
Event	Security Event (Cyber or Physical) An event has occurred	Yes	Non-Reportable
Not a compromise or disruption	Non-Reportable Cyber Security Incident A malicious act or suspicious event that IS NOT found to be an attempt to compromise a BES Cyber System and/or associated Electronic Access Control or Monitoring System (EACMS)	Yes	Non-Reportable
Attempt to compromise or disrupt	Reportable Attempt Cyber Security Incident A malicious act or suspicious event that IS found to be an attempt to compromise BES Cyber System and/or associated Electronic Access Control or Monitoring System (EACMS)	NO	Reportable
Actual compromise or disruption	Reportable Cyber Security Incident A Cyber Security Incident that has compromised or disrupted one or more reliability tasks of a functional entity	Yes	Reportable

Incident Response (Reference diagram Appendix 1: Low Impact CSIRP Diagram)

The following activities outline the actions Cutlass complete when responding to potential Cyber Security Incidents:

Immediate Response

Attempts should be made to contact and consult with appropriate site management personnel prior to determining whether a Cyber Security Incident is Reportable or Not Reportable. In all cases, regulatory reporting criteria and timeframes must be met. *Some reporting requirements for Cyber Security Incidents are within 1 hour.*

Upon Identification that an event is a Cyber Security Incident (or suspected Incident), Cutlass personnel shall immediately report the Incident to the Operations Supervisor and any other appropriate management personnel.

Cyber Security Incidents

For Cyber Security Incidents, Site Management must contact and coordinate with the CIP Senior Manager or Delegate on the appropriate Cyber Security Incident Report and Response actions.

Physical Security Breach/Threat

For a physical security breach or threat, Site Management must formulate an immediate response that includes:

a. Alerting on-site personnel of any existing safety issues. If personnel safety is threatened, personnel may be directed to take shelter or further actions as the situation evolves.

b. Determine if additional assistance is immediately needed from local law enforcement.

i. Fort Bend Police Department: (260) 427-1222

c. Take actions to mitigate the immediate risk to reliable operation of the Bulk Electric System.

Incident Response Cont.

Site Management and the CIP Senior Manager or Delegate initiate response and communication to mitigate Cyber Security Incidents. During the initial response and investigation, as much detail as possible shall be collected including (but not limited to) the following:

- Description of the event; including how and when it was discovered
- Impact, or expected possible impact, to Operations and/or components of the Bulk Electric System
- Availability of backup or redundant systems
- Physical areas and/or systems affected
- Actions already taken to respond
- Estimated restoration timeline

The Site Management, CIP senior Manager or Delegate, or other designated personnel will begin documenting the incident in an Incident Report (**See: Appendix 2: Cyber Security Incident Reporting Form**).

CIP Exceptional Circumstances (CEC)

Cutlass shall determine if the Incident classification meets the definition of a CEC (Reference Section “Definitions”). If so:

- Details of a CEC are recorded within **FRM-CIP003-CIP Exceptional Circumstance Form**
- The CIP Senior Manager or Delegate must make the declaration of a CEC for which the date and time shall be logged.
- Status notifications, including initiation and termination, of the declared CEC shall be made to senior management personnel by the CIP Senior Manager or Delegate.
- Once the CEC has been resolved, the CEC shall be declared complete for which the date and time shall be logged.

Incident Management & Classification

The following identifies scenarios and actions taken by Cutlass to classify and respond to Cyber Security Incidents. These actions are not intended to be all-inclusive, and any additional actions are determined by the Site Management and/or CIP Senior Manager or Delegate on a case-by-case basis.

Events & Suspected Activities

An event (Cyber or Physical) can occur during normal operations. Most have trivial causes requiring a routine maintenance action or other corrective actions that and are not the result of malicious activity. These Events will not be considered or handled as Cyber Security Incidents.

All events & suspected activities should be treated as breaches until an initial investigation has been completed. The Site Management must be notified of the suspected activity. If a suspected breach or attack is determined to be invalid, normal operations should continue. Suspected activities may include:

- Unknown devices, equipment, packages within the Facility
- Unknown (abnormal) personnel
- Unexplained equipment malfunctions
- Abnormal behavior of Cyber Assets or absence in logging

Breaches

Physical Security Breaches – Physical security breaches must be investigated, and the security perimeter secured. If determined to be a malicious act or potentially malicious act, responses include:

- Ensuring the safety of on-site personnel
- Notifying law enforcement (as necessary)
- Determining whether the attack has caused damage to equipment that could compromise or disrupt reliable operations of the BES.

Electronic Security Breaches – The immediate response must focus on containment of the event to minimize its effects on equipment and prevent the spread to other parts of the system. This may include:

- Disabling all suspected network connectivity
- Confirmation of physical access controls
- Removing equipment or programs from service (provided its removal does not itself compromise or disrupt stable operations of the BES).
- Requesting necessary technical support as needed (engineering, maintenance, IT) to ensure appropriate response and for the backup and storage of information required to recover BES Cyber System functionality.

Note - Data preservation should not impede or restrict recovery, but Cyber data, such as corrupted drives or recorded data, should, to the extent possible, be preserved for follow-up investigations and full recovery.

Attacks

Physical Security Attacks – The immediate response must focus on ensuring the safety of on-site personnel and mitigating the risk to reliable operations of the BES by protecting, restoring, or securing equipment or by otherwise stabilizing or securing site operations.

Electronic Security Attacks – The immediate response must focus on ensuring the BES Cyber System is still secure and that the attack did not result in a breach of the ESP. Responses may include:

- Reviewing BES Cyber System configurations (firewall settings, intrusion detection logs, etc.)
- Validation that suspected Cyber Assets have not been compromised
- Requesting technical support as needed (engineering, maintenance, IT) to ensure appropriate response and for the backup and storage of information required to recover BES Cyber System functionality.

Threats

Verbal Threats – Obtain all available information regarding the threat so that appropriate notifications and actions may begin.

- If a live caller is involved, obtain and document any available details that can be collected. If possible, remain on the phone with the caller to support call tracing.
- Notify the Site Management and other appropriate management so that reporting requirements may be considered.

Physical security threats (bombs, sabotage, weaponry, etc...) – Notify Site Management and local law enforcement immediately. Conduct a review of protective measures that are in place to ensure mitigation capability is intact.

- Implement increased security measures such as more frequent security patrols or additional security personnel (as appropriate).
- Conduct searches of security perimeters and site areas for signs of ingress or attempted ingress and report to the Operations Supervisor and other appropriate management.
- Once the threat window has passed, consider returning measures and controls to the baseline security posture.

Electronic security threats – while uncommon, threats to the BES Cyber System should be responded to using the same measures above for BES Cyber System attacks.

Note - CIP Exceptional Circumstance actions may be in exception to previously defined CIP related procedures and/or regulations. Exceptions to defined procedures should be noted for future review.

Cyber Security Incident Reporting

Cutlass is obligated to notify the E-ISAC of Reportable Cyber Security Incidents. Cutlass also reports such incidents to the appropriate Independent System Operator (ISO) and Reliability Entity (RE) as a best practice.

E-ISAC & DOE Reporting

As soon as practicable, and with consideration of the severity of the Cyber Security Incident and the filing horizon, the CIP Senior Manager and/or Site Management will contact the E-ISAC at (404) 446-9780 (Press 2) within one (1) hour from the time the Response Team concludes that functionality essential to performing reliability tasks has been compromised or disrupted (Reportable Cyber Security Incident).

Depending on the nature of the situation, Form OE-417 must be filed to the DOE either within one hour; six hours; or by the later of 24 hours after the recognition of the incident OR by the end of the next business day of the incident. The DOE reporting website provides provisions to include NERC and/or E-ISAC as additional recipients of the OE-417 submittal. For detailed procedure on reporting and filing OE-417 refer to filing instructions in the link:

https://www.oe.netl.doe.gov/docs/OE417_Form_Instructions_05312021.pdf

Reporting Updates

Cutlass will provide updates to the initial report, if any, within seven (7) calendar days of determination of new or changes attribute information. Attribute information under this requirement include: the functional impact, the attack vector used and the level of intrusion that was achieved or attempted. If any of these attributes receive new or updated information, they must be reported to both E-ISAC and NCCIC and indicated as an “Update” to the initial and/or prior updates.

CSIRP Review and Maintenance

The Site Management is responsible for initiating updates to the CSIRP as necessary. Any changes to the roles or responsibilities, response groups or technology that would impact the ability to execute the plan will be reflected in the plan and communicated to respondents no later than 60 calendar days after the change. The Site Management will facilitate the documentation and communication of any such changes. A review of the Cyber Security Incident Response Plan will be completed at least once every 15 calendar months.

CSIRP Testing

Cutlass will schedule and execute tabletop testing of the CSIRP for Low Impact BES Cyber Systems with representatives of those facilities at least once every 36 calendar months. Any such test can include an actual Reportable Cyber Security Incident, an attempted compromise of a Cyber Security Incident, a paper drill or tabletop exercise of a Reportable Cyber Security Incident. CSIRP testing does not require removing a component or system from service during the test.

It is important to treat the test as if it were a real incident; including completion of a “Drill” Incident Response Report, Executive Report, and/or completion of a “Drill” OE-417, if required by the scenario. Tests should also include validating contact numbers, email addresses and weblinks.

No later than 180 calendar days after completion of a Cyber Security Incident Response Plan test or actual Reportable Cyber Security Incident, Cutlass shall update the CSIRP if needed.

5. STANDARDS AND REQUIREMENTS

CIP-003-8 Attachment 1 Section 4 Each Responsible Entity shall have one or more Cyber Security Incident response plan(s), either by asset or group of assets, which shall include:

4.1 Identification, classification, and response to Cyber Security Incidents;

4.2 Determination of whether an identified Cyber Security Incident is a Reportable Cyber Security Incident and subsequent notification to the Electricity Information Sharing and Analysis Center (E-ISAC), unless prohibited by law;

4.3 Identification of the roles and responsibilities for Cyber Security Incident response by groups or individuals;

4.4 Incident handling for Cyber Security Incidents;

4.5 Testing the Cyber Security Incident response plan(s) at least once every 36 calendar months by: (1) responding to an actual Reportable Cyber Security Incident; (2) using a drill or tabletop exercise of a Reportable Cyber Security Incident; or (3) using an operational exercise of a Reportable Cyber Security Incident; and

4.6 Updating the Cyber Security Incident response plan(s), if needed, within 180 calendar days after completion of a Cyber Security Incident response plan(s) test or actual Reportable Cyber Security Incident.

6. DEFINITIONS

BES Cyber Asset (BCA) – A Cyber Asset that if rendered unavailable, degraded, or misused would, within 15 minutes of its required operation, misoperation, or non-operation, adversely impact one or more Facilities, systems, or equipment, which, if destroyed, degraded, or otherwise rendered unavailable when needed, would affect the reliable operation of the Bulk Electric System. Redundancy of affected Facilities, systems, and equipment shall not be considered when determining adverse impact. Each BES Cyber Asset is included in one or more BES Cyber Systems.

BES Cyber System (BCS) – One or more BES Cyber Assets logically grouped by a responsible entity to perform one or more reliability tasks for a functional entity.

BES Cyber System Information (BCSI) – Information about the BES Cyber System that could be used to gain unauthorized access or poses a security threat to the BES Cyber System. BES Cyber System Information does not include individual pieces of information that by themselves do not pose a threat or could not be used to allow unauthorized access to BES Cyber Systems, such as, but not limited to, device names, individual IP addresses without context, ESP names, or policy statements. Examples of BES Cyber System Information may include, but are not limited to, security procedures or security information about BES Cyber Systems, Physical Access Control System, and Electronic Access Control or Monitoring Systems that is not publicly available and could be used to allow unauthorized access or unauthorized distribution; collections of network addresses; and network topology of the BES Cyber System.

Bulk Electric System (BES) - See NERC "Glossary of Terms Used in NERC Reliability Standards" definition.

Cyber Assets – Programmable electronic devices, including the hardware, software, and data in those devices.

Cyber Security Incident – A malicious act or suspicious event that: - For a high or medium impact BES Cyber System, compromises or attempts to compromise (1) an Electronic Security Perimeter, (2) a Physical Security Perimeter, or (3) an Electronic Access Control or Monitoring System; or- Disrupts or attempts to disrupt the operation of a BES Cyber System.

Note – For Low Impact BES Cyber Systems, the only applicable portion of the definition of Cyber Security Incident is "A malicious act or suspicious event that: …Disrupts or attempts to disrupt the operation of a BES Cyber

Electronic Access Point (EAP) – A Cyber Asset interface on an Electronic Security Perimeter that allows routable communication between Cyber Assets outside an Electronic Security Perimeter and Cyber Assets inside an Electronic Security Perimeter.

Electronic Security Perimeter (ESP) – The logical border surrounding a network to which BES Cyber Systems are connected using a routable protocol.

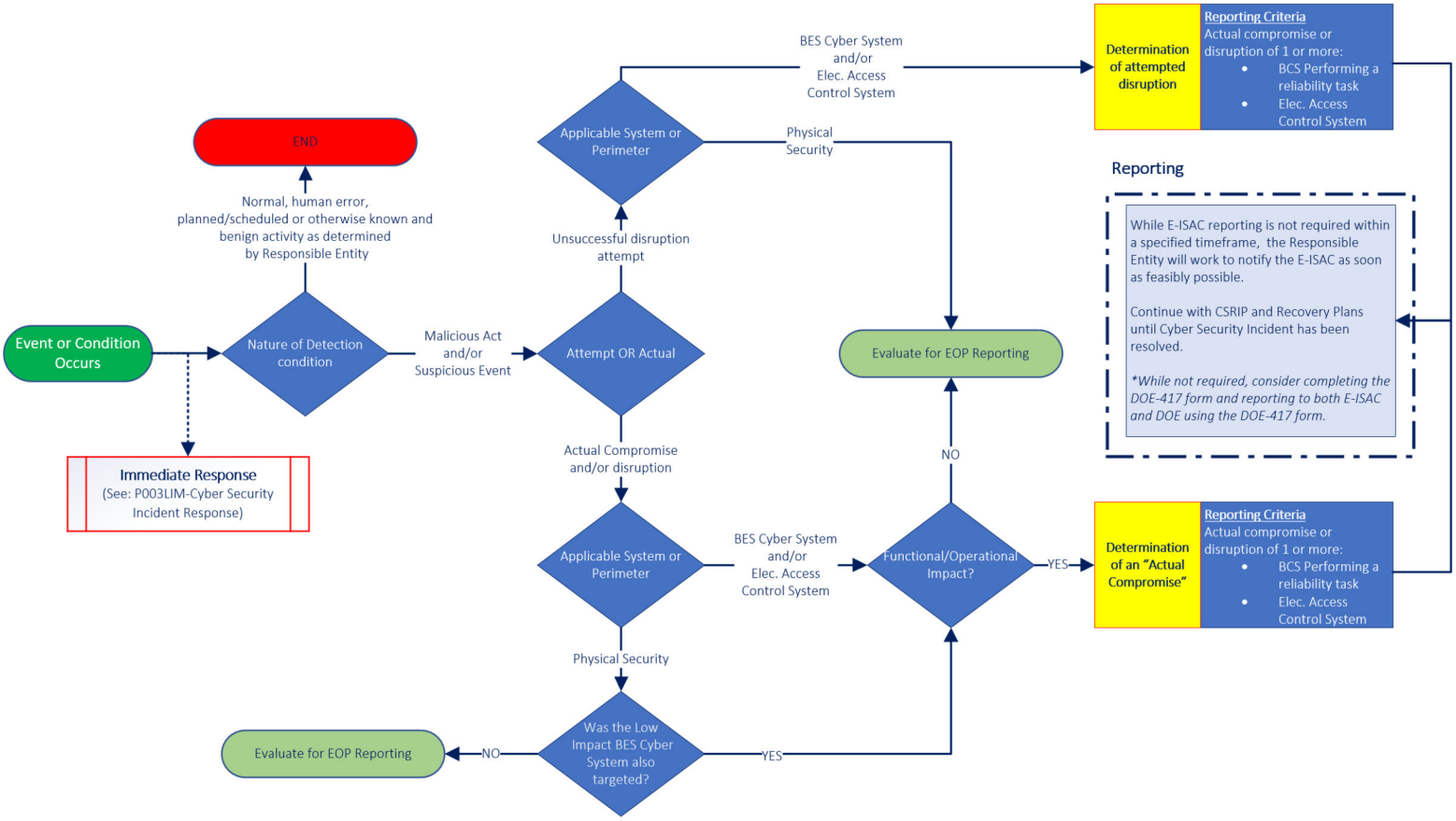
Reportable Cyber Security Incident – A Cyber Security Incident that compromised or disrupted: - A BES Cyber System that performs one or more reliability tasks of a functional entity; - An Electronic Security Perimeter of a high or medium impact BES Cyber System; or- An Electronic Access Control or Monitoring System of a high or medium impact BES Cyber System.

7. APPENDIX

Appendix 1: Low Impact CSIRP Diagram

Appendix 2: Cyber Security Incident Reporting Form

Appendix 1: Low Impact CSIRP Diagram



Appendix 2: Cyber Security Incident Response Form

CIP-008-6

CIP CYBER SECURITY INCIDENT RESPONSE

General Information	
Date Updated:	Incident Response #:

Respondent Information	
Incident Response Lead:	Title:
Incident Support Lead:	Title:

Additional Participants/Respondents		

Dates and Times Associated with Incident	
Initial Notification:	By:
Start of Incident:	*End of Incident:
Actual Initiation of Malicious Behavior (complete this section following root cause identification, if known):	

*In the "End of Incident" field, enter the date on which containment and eradication activities ended.

Overall Description of Incident

Root Cause

Containment Activities

Eradication & Recovery Activities

Lessons Learned

Threat Source (Attack Vector)		
☐ Unknown	☐ Email	☐ Improper Usage
☐ Attrition	☐ External/Removable Media	☐ Loss of Theft of Equipment
☐ Web/Cloud	☐ Impersonation/Spoofing	☐ Unmanaged Devices
☐ Other:		
Additional Information:		

Incident Classification & Associated Impact				
Incident Classification:	☐ Reportable Cyber Security Incident		☐ NON-Reportable Cyber Security Incident	
Functional Area Impact:	☐ Corporate	☐ Generation	☐ Transmission	☐ Other:
Impact to Operations?	☐ NO	☐ YES (provide details):		

Information Sharing	
☐ Legal	
☐ Communications	
☐ Human Resources	
☐ Physical Security	
☐ Law Enforcement	
☐ Regulatory Agencies	
☐ External Partners	
☐ Additional Contacts:	

Associated Documents	
☐ OE-417	Electric Emergency Incident and Disturbance Report
☐ E-ISAC	

☐ FBI	
☐ DHS	
☐ NCCIC	
☐ Additional Contacts:	

Near-Term Action Items (3-6 months)				
#	Description	Respondent	Due Date	Status
1				
2				
3				
4				

Long-Term Action Items (6+ months)				
#	Description	Respondent	Due Date	Status
1				
2				
3				
4				

Incident Log (Use this section to log incident activities.)			
Date	Time	Initial	Description of Activity

Incident Log (Use this section to log incident activities.)			
Date	Time	Initial	Description of Activity

Annex H - CIP-003 Physical Security Controls Plan

01/24/2023

VERSION CONTROL

Version	Approval Date	Effective Date	Revision Summary
1.0	01/24/2023	01/31/2023	Initial Physical Security Controls Plan

1. Objective
    i. This document provides the CIP Cyber Security Physical Security Controls Plan for Advanced Power - Cutlass Solar Project's low impact BES Cyber Systems. This procedure is used as a part of the compliance requirements outlined in NERC Reliability Standard CIP-003.
2. Applicable Systems
    i. The purpose of this plan is to detail the physical security controls implemented to enhance the security of the BES Cyber Systems based on Advanced Power - Cutlass Solar Project's Applicable Systems.
3. Terms and Definitions - Terms defined in the NERC Glossary of Terms are capitalized and used as defined. The additional terms listed in this section are specific to this document.
    i. Access Device- Any card, key, code, or other means that can be used alone or in conjunction with another Access Device to obtain entry.
    ii. Applicable Systems- BES Cyber Systems identified in the annual assessment required by CIP-002 and all cyber equipment identified in the Advanced Power - Cutlass Solar Project Electronic Access Controls Plan Required by CIP-003.
    iii. Escorted Access- Access granted into a secured area to an individual, that does require accompaniment by an authorized person.
    iv. Exceptional Situations- A situation that involves or threatens to involve one or more of the following, or similar, conditions that impact the safety of BES reliability.
        a) A risk of injury or death;
        b) Civil unrest;
        c) An imminent or existing hardware, software, or equipment failure;
        d) Unplanned or unauthorized destruction or damage to a security control;
        e) A security incident requiring emergency assistance;
        f) A response by emergency services; the enactment of a mutual assistance agreement;
        g) An impediment of large-scale workforce availability.
    v. Locking Device- A mechanism designed for keeping a barrier (e.g., door, lid, gate, combination lock) in a secured state operated only by an Access Device.
    vi. Unescorted Access- Access granted into a secured area to an individual without an accompaniment.
    vii. Visitor- Personnel without Unescorted Access granted by CIP Senior Manager or designee.

Acronyms

Acronym	Term
BES	Bulk Electric System
CIP	Critical Infrastructure Protection
CIP SI	CIP Sensitive Information
NERC	North American Electric Reliability Corporation

4. Procedure
    i. Assessment of Need for Physical Security Controls. Advanced Power - Cutlass Solar Project is a renewable generation entity. Advanced Power - Cutlass Solar Project has implemented physical security controls based on the need to protect facilities from damage and loss. The function of this physical security control plan is to control access and reduce or mitigate the risk of unauthorized individuals entering the site and for the protection of personnel and equipment
    ii. Identified Needs:
        a) Protect entire Facility against loss due to theft.
        b) Protect entire Facility against physical vandalism.
        c) Protect the generation controls against unauthorized physical access.

d) Protect the Protection System components against unauthorized physical access.

iii. Defense In-Depth

a) Advanced Power - Cutlass Solar Project has a defense in-depth approach, which consists of the physical security controls at the following layers:

b) Perimeter fence

c) Structures:

1. Operations and Maintenance (O&M) Buildings
2. Substation Control Houses
3. Solar Generation Structures

iv. Adequacy of Physical Security Controls

a) Advanced Power - Cutlass Solar Project has determined, based on the assessment of need for asset protection, that a defense-in-depth approach to physical security controls is appropriate for protection of Applicable Systems and individual resource's protection and control systems.

5. Physical Security Controls

i. Perimeter Controls

a) The perimeter fence which surrounds the O&M building and substation control house shall serve as a physical security control but not the primary physical security control.

b) The security gate, secured by a Locking Device, which grants access to the O&M building parking lock shall serve as a physical security control but not the primary physical security control.

c) The secured room inside of the O&M building and the substation control house, housing Applicable Systems shall serve as the primary physical security control.

d) Solar Generation structures shall serve as the primary physical security control for the individual resource's protection and control systems.

ii. Entryways

a) Entryways to locations housing Applicable systems and individual resource protection and control systems shall be equipped with a hardened door secured by a Locking Device controlled by an Access Device.

iii. Physical Access Control System Condition

a) In the absence of operational personnel with Unescorted Access permissions, entryways to locations housing Applicable Systems and individual resource's protection and control systems, including perimeter fences, shall be in a closed and locked state.

6. Physical Access Management

i. Unescorted Access

a) Individual need for Unescorted Access privileges to locations housing Applicable Systems and individual resource protection and control systems shall be determined by the CIP Senior Manager or designee.

b) Upon granting Unescorted Access the CIP Senior Manager or designee shall:

1. Distribute Access Devices to locations housing Applicable Systems and individual resource protection and control systems as needed and,
2. Document the approval for Unescorted Access via [Authorized Access Log Attachment B]

ii. Visitor Access

a) Visitor(s) access to locations housing Applicable Systems and individual resource protection and control systems shall be based on the need determined by Advanced Power - Cutlass Solar Project employees assigned to Advanced Power - Cutlass Solar Project.

b) Visitor(s) granted Escorted Access shall be Escorted by a designated Advanced Power - Cutlass Solar Project employee assigned to Advanced Power - Cutlass Solar Project with Unescorted Access (Escort).
c) Escort shall complete the [Visitors Log Attachment A] prior to entering locations housing Applicable Systems.

7. Exceptional Situations
    i. Exceptional Situations will be handled in accordance with the process contained in the CIP Exceptional Circumstances and Exceptional Situations section of the CIP Master Policy.
8. Access Device Management - Advanced Power - Cutlass Solar Project utilizes multiple Access Devices and processes for accessing structures housing Applicable Systems and their associated protection and control equipment.
    i. The CIP Senior Manager or designee shall:
        a) Ensure all non-issued Access Devices are stored in a secured location.
        b) Issue Access Devices to personnel approved for Unescorted Access, as needed.
        c) Ensure workstations with access management software installed are in a secured location.
        d) Update Access Devices used to unlock Locking Devices, as needed.
        e) Revoke, remove or change Access Device privileges as appropriate (i.e. changes in job function, lost or damaged Access Devices, compromised proximity card, etc.), and
        f) Document issuances/changes to status of Access Devices owned by Advanced Power - Cutlass Solar Project within the log [Authorized Access Log Attachment B].
9. Document Retention:
    i. Documentation related to physical security controls including, Access Device Logs shall be maintained for a period of three calendar years unless otherwise specified.

Cutlass Solar

AP-CS-PGCEOP-1.0 Annex H

Attachment A: Visitor Access Log To be completed by personnel with approved Unescorted Access.

VISITOR ACCESS LOG						
Site Manager:				Phone:		
Visitor Name	Company	Escort	Date	Time In	Time Out	Phone Number

Cutlass Solar

AP-CS-PGCEOP-1.0 Annex H

Attachment B: Authorized Access Log

Log shall be completed once access credentials are issued to an individual that has been granted Unescorted Access.

AUTHORIZED ACCESS LOG							
Site Manager:				Phone:			
Access Granted To	Date Granted	Granted By	Access Device Issued Y/N	Issued By	Date Access Removed	Access Devices Returned Y/N	Comments

Document Control:

Cutlass Solar

AP-CS-PGCEOP-1.0 Annex H

Name	Title	Date
Michael Stagliola	V.P. Operations	01/24/2023

Version	Approval Date	Effective Date	Revision Summary
1.0	01/24/2023	01/25/2023	Physical Security Plan

Annex L -Hurricane Response Plan

01/24/2023

In the event of a hurricane, the first priority is always the health and safety of Cutlass Solar Project personnel. - Cutlass Solar Project Hurricane Response Process/Plan (HRP) is listed below:

- Ensure all Cutlass Solar 1 Project personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, Cutlass Solar 1 Project personnel must evacuate at a time recommended by local authorities.
- The Cutlass Solar Project facility(ies) should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
    - Ensure all loose material or equipment is secured.
    - Ensure proper draining channels exist and are functional

Cutlass Solar 1 facility in Region 1, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Cutlass Solar 1 facility in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.
**** Cutlass Solar 1 Project IS LOCATED IN Region 2***

Cutlass Solar 1 facility in Region 3, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Cutlass Solar 1 facility facilities in Region 4, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Cutlass Solar 1 facilities in Region 5, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Cutlass Solar 1 facilities in Region 6, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

Cutlass Solar 1 shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

When re-entry to the affected facility is safe, it is important to ensure all emergency gear and equipment that may be necessary to clear paths are available, serviceable, and on hand to be used, if necessary. This equipment may include, depending on the circumstances, saws, tire chains, etc.
In the event that the entry route is obstructed or compromised, ensure proper PPE is worn and utilized and normal safety measures are employed.

Always ensure communication is maintained between Cutlass Solar 1 personnel attempting re-entry and Cutlass Solar 1 leadership.

The following individuals are responsible for maintaining, implementing, and revising the HRP.

Name	Title	Permission(s)
Chris Daycock	Manager, Technical	Maintain
Chris Daycock	Manager, Technical	Implement
Michael Stagliola	V.P., Operations	Revise

- provides a revision control summary that lists the dates of each change made to the HRP since the initial HRP adoption.

Version	Approval Date	Effective Date	Revision Summary
1.0	01/24/2023	01/25/2023	Initial Hurricane Plan

As of 01/24/2023, annexes associated with EOP Version 1.0, approved on 01/25/2023, supersede all previous HRP annexes.

Annex W - Weather Related Emergencies Plan

01/24/2023

Preparations for Operations During Extreme Cold Weather Conditions

For severe cold weather, Cutlass Solar 1 Project shall will identify, through inspection, areas of the generating facility that may be most vulnerable to malfunction during extreme cold events. Cutlass Solar 1 - Cutlass Solar Project staff shall ensure the following:

- Cutlass Solar 1 Project staff will ensure heat tracing is present and functional for all appropriate exposed instrumentation and/or equipment, where applicable.
- Where appropriate and necessary, temporary barriers shall be erected to shield sensitive or exposed equipment and instrumentation from wind and freezing precipitation.
- Temporary barriers may be constructed of plastic sheeting or other material that is sufficient to protect exposed equipment and instrumentation, and may contain, if conditions warrant, a portable heat source to keep temperatures above freezing in the designated area.
- Other measures may be taken, as the generation facility staff see fit, to protect the facility during an extreme cold weather event.

Preparations for Operations During Extreme Hot Weather Conditions

For extreme hot weather, Cutlass Solar 1 Project staff shall ensure the following:

- Proper ventilation is present and functional for any areas where extreme hot temperatures may negatively impact generator output.
- In addition to this, portable fans may be mobilized to force air around potentially affected areas.

In all cases, Cutlass Solar 1 Project staff will ensure that any substation or switchyard equipment that it owns is properly weatherized. This includes the following:

- Ensuring all breaker and transformer oil levels and air compressor tank levels are adequate for that equipment manufacturer and model.
- Heaters in breaker and transformer cabinets are functioning properly.
- Adequate supply of spare gas and diesel oil is available to be used during an emergency.

It is important, after any weather-related emergency, to analyze the performance of the generating plant, identify any equipment failures that occurred (if any), and develop and action plan to address those issues. These issues may include the following:

- A list of equipment that failed during the last cold or hot weather event must be identified and addressed. Additionally, any critical failure points identified must

be tracked through the normal maintenance processes to ensure appropriate maintenance has taken place for the identified equipment. Any facility equipment design limits that could limit generator output must be identified and addressed, to the extent possible, to ensure no interruption of operations occurs during an extreme weather event.

- Cutlass Solar 1 Project staff shall actively monitor all potential extreme weather events that may affect their facilities, to include sever weather and operational circumstances arising from those events. Cutlass Solar 1 Project staff will continue monitoring weather forecasts and ERCOT operational data aid in predicting conditions on the BES that may impact operations.
- It is imperative to ensure entry and egress routes are hardened to the extent possible. Make sure to elevate and/or secure equipment that may be subject to being carried away by flood currents, and ensure cabinets, control house, and other fixed structures are weatherproofed to extent possible.

Cutlass Solar

Emergency Operations Plan

Cutlass Solar 1

Version 1.5

Effective Date:

02/27/2023

Contents

Approval and Implementation

Introduction:

- This EOP is developed to help ensure Cutlass Solar 1 Project's continued power generation operations in the event of emergency conditions, including, but not limited to pandemic(s) or severe weather. This plan includes the necessary elements, pursuant to PUCT Rule §25.53.

The following individuals are responsible for maintaining, implementing, and revising the EOP.

Name	Title	Permission(s)
Eleo Castillio	Field Service Tech SOLV Energy	Maintain
Cord Ordica	Regional Lead SOLV Energy	Implement
Michael Stagliola	VP, Operations Cutlass Solar	Revise

- 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.

Version	Approval Date	Effective Date	Revision Summary
1.0	01/30/2023	01/31/2023	Initial Emergency Operations Plan
2.0	2/25/23	2/27/23	Amended EOP

As of 02/27/2023, EOP Version 2.0, approved on 02/27/2023, supersedes all previous EOPs.

Communication Plan

An entity with generation operations must describe the procedures during an emergency for communicating with,

- the media
- PUCT
- OPUC
- QSE
- fuel suppliers
- Local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity
- and ERCOT, as the Reliability Coordinator.

This communication plan stipulates that Cutlass Solar personnel will use the table below to ensure the appropriate entities are notified of the emergent event, whether it be a weather event, or any other emergency. At a minimum, the information to be conveyed shall include the nature of the event, what originated the event (if known), any potential outage or degraded output information, and mitigation efforts. Cutlass Solar 1 personnel shall memorialize contact with each agency via e-mail to the External Emergency Operations Contact List or directly after contact is made with the agency on the External Emergency Operations Contact List and send an e-mail to the AP-CS-PGECOP-1.0 EOP Attachments B-E "Distribution Plan to Cutlass Solar 1 Project Staff" (the distribution list) stating above minimum information was conveyed documenting contact notification was made. The e-mail shall document the time and date of agency contact.

Cutlass Solar 1 Project External Emergency Operations Contact List

EMERGENCY OPERATIONS CONTACT LIST (EXTERNAL)			
NAME	ENTITY	PHONE NUMBER	EMAIL
Shift Supervisor	ERCOT	(512) 248-6800	ServiceDesk@ercot.com
QSE	Tenaska	817-462-1509	Tenasksacomm@tnsk.com
PUCT Infrastructure Staff	PUCT	512-936-7197	n/a
RTO HOTLINE	Center Point Energy	281-894-1625	n/a
RTO System Controller	Center Point Energy	281-894-0491.	n/a

Cutlass Solar 1 Project Internal Emergency Operations Contact List

INTERNAL CUTLASS SOLAR 1 EMERGENCY OPERATIONS CONTACT LIST			
NAME	ENTITY	PHONE NUMBER	EMAIL
Cesar Castillio	SOLV Energy	702-786-7343	cesar.castillo@solvenergy.com
Eleo Castillo	SOLV Energy	210-790-1729	Eleo.Castillo@Solvenergy.com
Cord Ordica	SOLV Energy	903-249-4409	cord.ordorica@solvenergy.com
Patrick McDonald	SOLV Energy	435.691.4725	pamcdonald@SOLVenergy.com
Patrick Sullivan	SOLV Energy	408.348.4881	psullivan@solvenergy.com
Morgan Smith	SOLV Energy	760-3178481	MOSMITH@solvenergy.com
Shannon Poulter	Cutlass Solar	435-279-5702	spoulter@advancedpowerna.com

	1 Project		
Michael Stagliola	Cutlass Solar 1 Project	617-459-2060	mstagliola@advancedpowerna.com
Chris Daycock	Cutlass Solar 1 Project	617-784-8338	cdaycock@advancedpowerna.com
Jack Sloyan	Cutlass Solar 1 Project	857.445.1729	jsloyan@advancedpowerna.com
John Coleman	Cutlass Solar 1 Project	617-429-1020	jcoleman@advancedpowerna.com

Definitions and Acronyms

TERM	ACRONYM	DEFINITION
Annex		A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill		An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Electric Reliability Council of Texas	ERCOT	Independent System Operator for approximately 90% of the state of Texas.
Emergency		A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity		An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard		A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a

		condition that is potentially harmful to the continuity of electric service.
Power Generation Company	PGC	Generates electricity intended to be sold at wholesale and does not own a transmission or distribution facility in this state (with some exceptions, see PUC Substantive Rule 25.5(23) and 25.5(45)).
Public Utility Commission of Texas	PUCT	The PUCT is the regulatory body for energy entities in the state of Texas.
Qualified Scheduling Entity	QSE	Submit bids and offers on behalf of resource entities (REs) or load serving entities (LSEs) such as retail electric providers (REPs).
State Operations Center	SOC	The SOC is operated by TDEM on a 24/7 basis and serves as the state warning point.
Texas Department of Energy Management	TDEM	coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters.
Threat		The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

PURPOSE & FILING REQUIREMENTS

As a registered PGC, in the ERCOT footprint, Cutlass Solar 1 Project is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. As such, Advanced Power has developed this plan to comply with the PUCT Substantive rule, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) before COD if it is a new facility or (b) within 30 days of a substantive change to the plan. A substantive change that is made to the plan between November 1st and April 30th must be filed no later than June 1st of that year. If a substantive change is made to the plan between May 1st and October 31st, the submission date is no later than December 1st of that same year. At all times, the most recent approved copy of the Cutlass Solar 1 Project Emergency Operations Plan (AP-CS-PGCEOP-1.0) must be available at the main office for PUCT inspection.

- For Cutlass Solar Project, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

Maintenance of Pre-identified Supplies for Emergency Response

A plan to maintain pre-identified supplies for emergency response.

Cutlass Solar 1 Project staff shall identify any supplies necessary for continued operations during an extreme weather event, and must procure, to the extent possible, those supplies. A list of some of these supplies is contained below:

- Fuel for generator
- Fuel for heaters
- PPE
- Spill Kit
- First Aid kit & supplies
- Drinking Water
- Cleaning Supplies
- Fire Extinguishers

See Attachment D for a listing of supplies required for emergency response.

Staffing During Emergency Response

A plan that addresses staffing during emergency response. Cutlass Solar 1 Project will identify appropriate staff and staffing levels to respond to emergency conditions, including, but not limited to severe weather events, physical threats or physical damage, and cyber security events.

Cutlass Solar 1 Project shall identify operational and management staff that will remain on call or on stand-by for the duration of the emergency (Attachment C). This list may be dynamic and will be subject to change should conditions warrant it.

Evidence:

1. Cutlass Solar 1 Project EOP includes on Attachment C, a staffing plan for severe weather events.
2. In advance of future storms, the Project will provide emails or documented evidence that staff was notified and understood their expectations during a severe weather event, physical threats or physical damage, and cyber security event.

Weather-related Hazards

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.

Cutlass Solar 1 Project staff shall actively monitor all potential extreme weather events that may affect their facilities, to include sever weather and operational circumstances arising from those events. Cutlass Solar 1 Project staff will continue monitoring weather forecasts and ERCOT operational data aid in predicting conditions on the BES that may impact operations.

Any Evidence of:

1. Email notification from Tenaska Power Services of ERCOT Protocol Language of an Advance Action Notice, complete with timestamps.
2. Any dated correspondence to reflect communication of a potential or forecasted Emergency Condition to staff.
3. Screenshot of ERCOT Real Time Operations website and local weather forecasts.

Additional Annexes

Cutlass Solar 1 Project, in its operational capacity as a PGC, must include the following annexes for its generation resources other than generation resources authorized under PURA §39.918:

Weather Emergency

- operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title,
- 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.

For severe cold weather, Cutlass Solar 1 Project shall identify, through inspection, areas of the generating facility that may be most vulnerable to malfunction during extreme cold events. Cutlass Solar 1 Project staff shall ensure the following:

- Cutlass Solar Project staff will ensure, where applicable, heat tracing is present and functional for all appropriate exposed instrumentation and/or equipment, where applicable.
- Where appropriate and necessary, temporary barriers shall be erected to shield sensitive or exposed equipment and instrumentation from wind and freezing precipitation.
- Temporary barriers may be constructed of plastic sheeting or other material that is sufficient to protect exposed equipment and instrumentation, and may contain, if conditions warrant, a portable heat source to keep temperatures above freezing in the designated area.
- Other measures may be taken, as the generation facility staff see fit, to protect the facility during an extreme cold weather event.

For severe hot weather, Cutlass Solar 1 Project staff shall ensure the following:

- Proper ventilation is present and functional for any areas where extreme hot temperatures may negatively impact generator output.
- Inverter filters are clean following OEM guidance.
- In addition to this, portable fans may be mobilized to force air around potentially affected areas.
- Ensure normal facility cooling measures are maintained and operational such as HVAC systems.

In all cases, Cutlass Solar 1 Project staff will ensure that any substation or switchyard equipment that it owns is properly weatherized. This includes the following:

- Ensuring all breaker and transformer oil levels, nitrogen levels, and air compressor tank levels are adequate for that equipment manufacturer and model.
- Heaters in breaker and transformer cabinets are functioning properly.
- Adequate supply of spare gas, diesel oil and transformer oil is available to be used during an emergency.

Evidence - Maintenance records, records of inspection at generating sites, photos of erected temporary barriers, portable heaters in service, heat trace application photos, photos of unobscured ventilation, photos of any cooling measures deployed photos of any other weatherization measures with dates. If any breakers or transformers fall under the facility's purview, dated inspection and maintenance records detailing heater functionality and oil and gas levels and a list of any spare bottles of gas or stores of oil.

A water shortage annex that addresses supply shortages of water used in the generation of electricity;

Not applicable as Cutlass Solar 1 Project assets do not use water to generate power.

Evidence: Cutlass Solar 1 Project has included an attestation declaring this portion of the plan is not applicable.

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;

Cutlass Solar 1 Project's plan for emergency operation addresses its process for recovering generation capacity, should an emergency force a derate, a unit trip, or inability to generate and fulfill its MW obligations. These actions are listed in Attachment E and AP-CS-PGCEOP-1.0 - CSIRP.

Evidence – Cutlass Solar 1 Project has included Attachment E, document all actions taken to address any inability to generate MW along with a detailed description of communications to QSE and/or ERCOT.

A pandemic and epidemic annex;

Cutlass Solar 1 Project's existing pandemic/epidemic plan for business continuity is listed in Annex F.

A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;

In the event of a hurricane, the first priority is always the health and safety of Cutlass Solar 1 Project personnel. The Cutlass Solar 1 Project hurricane response process is listed below:

- Ensure all Cutlass Solar 1 Project personnel and any potentially affected public personnel are not in danger.

- By using the evacuation routes contained in the HRP (Annex L-AP-CS-PGCEOP-1.0 Hurricane Response Plan), Cutlass Solar 1 Project personnel must evacuate at a time recommended by local authorities.
- The Cutlass Solar 1 Project facility should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
    - Ensure all loose material or equipment is secured,
    - Ensure proper draining channels exist and are functional.

Cutlass Solar 1 Project, located in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

A cyber security annex;

- The Cutlass Solar 1 Project Cyber Security Incident Response Policy (Annex G - AP-CS-PGCEOP-1.0) contains this information.
- ***When the Cutlass Solar Project's Cyber Security Incident Response Plan (CSIRP) is amended, this Annex should be replaced with the new CSIRP document.***

A physical security incident annex;

- This annex (Annex H-AP-CS-PGCEOP-1.0) contains reporting for physical threats to Cutlass Solar 1 Project, as well as actual damage to or destruction of Cutlass Solar 1 Project, per NERC Reliability Standard EOP-004. The *DOE digital form*, OE-417 shall be used to communicate physical attacks and cyber security incidents.

Checklist of generating facility personnel to address emergency events;

- Cutlass Solar 1 Project shall use the checklist in *Attachment C "Emergency Staffing Schedule"* (attached spreadsheet) to identify which personnel shall address events that arise during the emergency.

Evidence – Cutlass Solar 1 Project has included Attachment C and will documents any actions taken to address any vulnerabilities found and addressed while completing the checklist.

A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels;

As an energy storage facility, measures for securing alternative **fuels are not applicable.**

Evidence – Cutlass Solar 1 Project has included an affidavit that Project is a solar voltaic generation facility and does not require fuels to generate electricity.

Affidavit

PUC Filing Requirements

An entity must file an emergency operations plan (EOP) and executive summary by April 15, 2022.

A. An entity must file with the commission:
   i. an executive summary that:
      I. describes the contents and policies contained in the EOP;
      II. includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
      III. includes the record of distribution required under paragraph (4)(A) of this subsection; and
      IV. contains the affidavit required under paragraph (4)(C) of this subsection; and
   ii. a complete copy of the EOP with all confidential portions removed.

B. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.

C. In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:
   i. A record of distribution that contains the following information in table format:
      I. titles and names of persons in the entity's organization receiving access to and training on the EOP; and
      II. dates of access to or training on the EOP, as appropriate.
   ii. A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
   iii. An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
      I. 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;
      II. the EOP has been reviewed and approved by the appropriate executives;
      III. drills have been conducted to the extent required by subsection (f) of this section;
      IV. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
      V. the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and

VI. the entity'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, IS-200, IS-700, and IS-800 National Incident Management System training.

Annual Review

An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

A. An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:
   a. file with the commission an executive summary that:
      i. describes the changes to the contents or policies contained in the EOP;
      ii. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
      iii. includes the record of distribution required under paragraph (4)(A) of this subsection; and
      iv. contains the affidavit required under paragraph (4)(C) of this section;
   b. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
   c. submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.

B. An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:
   a. a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;
   b. 13
   c. the affidavit described under paragraph (4)(C) of this subsection.

Annual Drill

An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM (Texas Department of Emergency Management), at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and

location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

By applying the Emergency Operations Drill Instructions and completing Attachment B, Cutlass Solar 1 Project Emergency Operations Plan shall be tested each year, no later than **August 1,** and includes a review section, to identify and correct any vulnerabilities in the Emergency Operations Plan. Cutlass Solar 1 Project Emergency Operations Drill Procedure has a section dedicated to any generation facility that is located within a defined hurricane evacuation zone. For additional support, contact the **TDEM Exercise Unit.**

Evidence -Cutlass Solar 1 Project has included Emergency Operations Drill instructions here in and provided in Attachment B, an attendance/participation record with date and names document that will be filed upon future emergency drills.

Cutlass Solar 1 Project, as a registered RE, shall provide ERCOT with any updated versions of their emergency operations plan by **June 1** *for any updates made between November 1 and April 30*, and by **December 1** *for any updates made between May 1 through October 31*. Cutlass Solar 1 Project shall submit all updated plans electronically.

Weatherization Plan

Attachment I is the attestation ERCOT requires for notification of the Winter Preparedness Checklist, ERCOT Protocol Section 22 Completion of Weatherization Preparations.

Evidence – Cutlass Solar 1 Project has previously submitted an e-mail with the file Attachment I, to ERCOT (11_1_22).

The following files are not convertible:

Copy of AP-CS-PGCEOP-1.0 Emergency Operations Plan - Attachments B-E.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

ATTESTATION REGARDING COMPLIANCE WITH THE LONE STAR INFRASTRUCTURE PROTECTION ACT

Interconnecting Entity (IE): Cutlass Solar LLC

IE's Interconnection Request (INR) number: 19INR0131

Check the one box that applies [do not check both boxes]:

1. With respect to the above referenced IE and INR number and with respect to each Entity with an ownership interest in the real property to be utilized by the above referenced IE's project ("Property Owner"), I hereby attest that:

☒ NONE of the following statements in paragraphs (A)-(C) are TRUE.

☐ ONE OR MORE of the following statements in paragraphs (A)-(C) are TRUE.

A) the IE or Property Owner, or a wholly owned subsidiary, majority-owned subsidiary, parent company, or affiliate of the IE or Property Owner, is owned by:

(i) individuals who are citizens of China, Iran, North Korea, Russia, or a designated country;[8] or

(ii) a company or other entity, including a governmental entity, that is owned or controlled by citizens of or is directly controlled by the government of China, Iran, North Korea, Russia, or a designated country; or

B) the majority of stock or other ownership interest of the IE or Property Owner, or a wholly owned subsidiary, majority-owned subsidiary, parent company, or affiliate of the above referenced IE or Property Owner is held or controlled by:

(i) individuals who are citizens of China, Iran, North Korea, Russia, or a designated country; or

(ii) a company or other entity, including a governmental entity, that is owned or controlled by citizens of or is directly controlled by the government of China, Iran, North Korea, Russia, or a designated country; or

C) the IE or Property Owner, or a wholly owned subsidiary, majority-owned subsidiary, parent company, or affiliate of the IE or Property Owner is headquartered in China, Iran, North Korea, Russia, or a designated country.

[8] The term "designated country" as used in this attestation shall have the same meaning as the definition of that term in Texas Business and Commerce Code, Section 113.001(4).

If you checked the second box above (i.e., ONE OR MORE statements are TRUE), then please provide the following additional information:

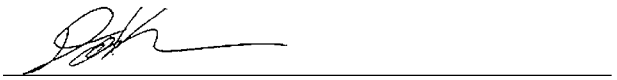
Name(s) of the entities or individuals that have a majority ownership interest in the IE:

Country of citizenship and/or headquarters location for each entity or individual listed:

Other information:

If you have any documentation confirming the above information, please submit it along with the attestation.

By signing below, I certify that I am an officer, executive, or authorized employee with authority to bind the IE listed above, that I am authorized to execute and submit this attestation on behalf of each IE listed above, and that the statements contained herein are true and correct.



Signature

David Kuwabara
Name

Secretary
Title

February 17, 2023
Date

Winter Preparation Checklist

Purpose

The purpose of this document is to provide guidance for preparing Cutlass 1 Solar for winter operation. Actions and inspections will be made prior to winter operations on December 1st each year and this document utilized to document the inspection and the actions taken.

Desired Outcome

Identify and prioritize components, systems, and other areas of vulnerability which may experience freezing or other cold weather operational issues. This includes critical components and systems that have the potential to:

- Create a safety hazard
- Initiate an automatic unit trip
- Impact unit start-up
- Cause partial outages
- Cause damage to the unit
- Cause other operational problems such as delayed action of field devices

Safety

Safety remains the overriding value during winter operations and weather events. Job Safety Assessments (JSAs) should include potential risks created by cold weather operation of the site.

Training

The O&M provider will coordinate annual training in winter specific and plant specific awareness and maintenance. This should include personal safety, equipment parameters that may be affected by cold weather, equipment and component inspections and remedial processes and procedures. Annual training should also include lessons learned from previous winters and related cold weather experience.

Pre-Winter Season Checklist

Personnel Preparation

Activity	Response	Completed By	Date
Planning and Training			
Review notification Process for inclement weather response – include field tech, control center, and owner/owner's representative	Field technicians have been trained on how to respond to issues created by the winter weather. Training based off Feb/2021 and winter 2021/early 2022. Anti-gel to be supplied for each technician with diesel	Eleo Castillo	TBD

Winter Preparation Checklist

	vehicle to allow dispatch of all technicians.		
Review process for tracking inclement weather and identify responsible personnel	Technicians notified of who has weather tracking capability and will notify them in the event of inclement weather.	Eleo Castillo	TBD
Describe or provide procedures for the likely weather scenarios (i.e. flooding, tornado, hurricane) as regionally applicable to the facility.	In the event of tornadoes, hail, or flooding in the area, site technicians have an EOP that they are trained to follow. The site is setup to automatically stow in the event of flooding or high winds and techs have been trained on how to stow for hail mitigation.	Eleo Castillo	TBD
Review and act on lessons learned from prior cold weather operation	Technicians held a meeting regarding the proper spare materials that need to be on hand. Such needed materials are spare, charged, SPC batteries as well as having a heat source to defrost locks on gates for access. Anti-gel for fuel added to technician supplies this year.	Eleo Castillo	TBD
Review site evacuation notification process and evacuation procedure	Site technicians reviewed the process and site lead is responsible for accountability of all personnel on site in the event of an evacuation.	Eleo Castillo	TBD
When was the Emergency Operations Procedure last updated?	The EOP was last updated in March of 2021 following snowstorm Uri.	Patrick McDonald	TBD
Does the Emergency Operations Procedure include an annual review? If so, what was the date that was completed?	Annual review was performed in June of 2022. This review was performed to prepare for all weather conditions that have been experienced on site since SOLV techs have been on site.	Eleo Castillo	TBD

Winter Preparation Checklist

Identify primary and secondary communications process to ensure all involved persons are notified in the event of inclement weather	Primary- Site lead contacts all personnel in field to report to the designated shelter (O&M building). Secondary- If not able to contact by phone then site lead will travel to location that was discussed the crew would be in for notification.	Eleo Castillo	TBD
Hold and document attendance at winter readiness meetings on an annual basis to prepare for severe cold weather operation before December 1st, highlighting preparations and expectations	All site personnel held a meeting to discuss the proper procedures to use in the event of inclement winter weather. SOLV technicians reminded of conditions from previous winter events and the failures to expect.	Eleo Castillo	TBD
Assign, prioritize and schedule work orders and winter preparation tasks	Following are meetings and training, site technicians began gathering the materials to ensure that all needed equipment is ready and available. Once winter moves closer, daily site inspections become important to ensure that the field is operating properly.	Eleo Castillo	TBD
Review cold weather scenarios affecting critical equipment	Site technicians covered this in an initial meeting on 10/17/22 to include all new technicians. This is also implemented into weekly meetings as winter closes in to make sure everyone is still clear on the plans laid out and how to handle any issues caused by the inclement weather.	Eleo Castillo	TBD
Develop a list of critical instruments that require increased surveillance during severe winter weather events	The number one issue that is created by the cold weather is dead SPC batteries. Therefore daily inspections of the field are implemented	Eleo Castillo	TBD

Winter Preparation Checklist

	once the cold weather approaches.		
Employee Transportation Plan in place	All site vehicles are 4x4 to allow employees to be able to traverse the site regardless of the weather that arises. There are 4 trucks as well as 2 UTVs and a 4x4 tractor available.	Eleo Castillo	TBD
"Buddy System" to be implemented in cases of inclement weather	All technicians use the buddy system in the event of inclement weather.	Eleo Castillo	TBD
Inspections			
Cold Weather PPE available	Cold weather PPE is available, and technicians generally keep some in the trucks with them as well as additional PPE stored in the office if needed.	Eleo Castillo	TBD
No Broken, damaged cabinet doors and access panels	All site doors and access panels are inspected monthly. Currently all are in good condition.	Eleo Castillo	TBD
All cabinet heaters and desiccant functioning and/fresh if applicable	Due to the climate in this area of Texas, the equipment uses the heat it produces as heaters. All desiccant is inspected on a monthly basis and is currently fresh.	Eleo Castillo	TBD
Cabinet and Inverter weatherization intact	All doors are closed and the weather stripping is intact on all cabinets. Various sections of weather stripping replaced throughout year to keep this up to date.	Eleo Castillo	TBD
Filters in good shape	Per Power Electronics, the filters that were removed for summer are not being reinstalled. They are expecting to have technicians on site before the new transformer comes online to do a full inspection of all inverters.	Eleo Castillo	TBD

Winter Preparation Checklist

Activate plan to inspect inverter ventilation systems on a regular basis to ensure that they are not iced up or plugged	The ventilation system will be inspected each day during the site inspection to ensure all inverters are properly operating. These are included to be inspected during inspection for rows off angle due to dead batteries.	Eleo Castillo	TBD
Wire management – no wires hanging without support	All wires have hangers that hold them off the ground. No issues have been reported or seen during inspections.	Eleo Castillo	TBD
Review facility CMMS to ensure adequate annual preventative work orders exist for winter weather preparedness	There are weekly and monthly inspections set up in the system that relate to winter weather checks.	Eleo Castillo	TBD
Inspect or install site markers in areas that may need to have snow plowed for access	Unless a plow is purchased to be used with the site UTVs, there are not plows available in this area. We do have a bucket attachment for the tractor that can be used if need arises.	Eleo Castillo	TBD
Check vehicles for correct maintenance and emergency preparation kits	All site vehicles are equipped with fire extinguishers and first aid kits in the event of an emergency.	Eleo Castillo	TBD
Verify adequate inventory parts and supplies are available	Inventory is maintained through our sprocket input. Supplies are currently adequate.	Eleo Castillo	TBD
Ensure all exterior housekeeping is in good order and nothing left out that should be discarded or covered	All items that need to be covered are stored in connexs.	Eleo Castillo	TBD
Ensure adequate supply of N2 and SF6 gas in equipment and associated heaters, if any, are operable	All gases are inspected on a monthly basis throughout the site. Gases are at an acceptable level.	Eleo Castillo	TBD
Verify oil levels in transformers are appropriate for the actual oil temperature	TBD	Eleo Castillo	TBD
Ensure snow removal equipment is appropriately staged and in good working order if applicable	Shovels are stored in a connex for use if needed. Tractor with bucket	Eleo Castillo	TBD

Winter Preparation Checklist

	attachment available and ready		
Physically verify trackers will go to full stow (60 degrees) in preparation for forecasted hailstorms	Trackers tested and stow capability is functional	Eleo Castillo	TBD
Physically verify wind monitoring systems are functioning and tracker systems can respond to high-wind events	Wind sensors tested and verified functional for stow.	Eleo Castillo	TBD
Physically verify trackers will go to full snow shed position in preparation for forecasted snowstorms	Included in the testing performed for stowing for hailstorms.	Eleo Castillo	TBD