

Filing Receipt

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1.0 INTRODUCTION TO FACILITY

1.1 Facility¹ Information

BT Coniglio Solar, LLC (Coniglio or "Facility"), a 135 MW (nameplate) solar facility located in Fannin County, Texas. Coniglio will commence commercial operations in July of 2021 and is interconnected to Oncor Electric Delivery Company's 138 kV Gober Switch in the Company's Valley Switch 138-Commerce Switch 138 kV transmission line, located in the Electric Reliability Council of Texas (ERCOT) footprint. DEPCOM is the registered Generator Operator (GOP) and the operations and maintenance (O&M) provider for the Coniglio Facility.

2.0 PURPOSE

ERCOT and Public Utilities Commission of Texas

This Plan provides guidance and direction regarding compliance with the emergency operations requirements as a Power Generation Company (PGC) under Chapter 25 of the Public Utilities Commission of Texas (PUCT) Electric Substantive Rules.

Occupational Safety and Health Administration

This plan has been developed to ensure compliance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.38 (Emergency Action Plans). Coniglio acknowledges awareness that any significant changes in types or quantities of chemicals or other hazards on the site will necessitate review of this plan. Any such revisions to this plan will be communicated with appropriate agencies and organizations

Beyond compliance with the rules noted above, Coniglio recognizes that proper planning for emergency operations is critical to provide a coordinated response that protects life, property, and the environment.

3.0 SCOPE

This Plan covers all in-scope Chapter 25 - <u>Subchapter C. - Infrastructure and Reliability²</u> requirements. Coniglio maintains a separate *Pandemic Preparedness Plan, Summer Weatherization Plan,* and *Winter Weatherization Plan.*

Coniglio understands and affirms that corporate and facility management, with critical execution and support from the operations and maintenance (O&M) provider, will play an important role in maintaining an effective weatherization program for Coniglio. It is the responsibility of all personnel to exercise good judgment in the performance of this plan.

¹ BT Coniglio Solar ERCOT SGIA 20INR0261

² Chapter 25. <u>Substantive Rules Applicable to Electric Service Providers, §25.53 Reliability and Continuity of Service</u>

Any questions regarding this plan should be directed to the Coniglio Compliance Manager.

4.0 TRAINING

All Personnel (inclusive of appropriate employees, O&M personnel, and GOP personnel) shall receive training on this *Emergency Operations Plan* (EOP) whenever it is modified or on at least an annual basis. Employees will also be trained when this plan is initially implemented. Contractors and visitors who will enter operating areas of the facility will be trained on plant alarms, mustering locations and evacuation procedures before they enter the facility for the first time, and at least annually thereafter. A listing of contractors and visitors with current training on this plan will be maintained at the facility for reference purposes

5.0 ROLES AND RESPONSIBILITIES

This plan describes the responsibilities and activities required of various parties (Personnel) in the development and execution of the EOP. Coniglio understands that corporate and facility management, with critical execution and support from the operations and maintenance (O&M) Provider, will play an important role in maintaining an effective EOP. It is the responsibility of all Personnel to exercise good judgment in the performance of this plan.

5.1 Coniglio Compliance Manager

5.1.1 Role – The Coniglio compliance manager and owner of this plan.

5.1.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee the development and implementation of this plan. Ensure the plan is up-to-date and aligns with Coniglio's business objectives and addresses requirements.
- Oversee revisions and updates to the Plan as necessary, as well as the implementation of the revised Plan, and a review of supporting documents, as needed.
- Participate in training and drills/exercises, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this Plan are completed, in concert with the DEPCOM District Manager.
- Reviews and approves this Plan annually.
- Maintains evidence.

5.2 **REGIONAL District Manager**

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- 5.2.1 Role the manager of the team contracted to perform the O&M services at the Coniglio Facility.
- 5.2.2 Responsibilities include:
 - Ensure the requirements and processes laid out in this plan are followed by site Personnel.
 - Lead Field Services in the execution of this Plan and set expectations with Field Service Technicians for safe and reliability operational performance of the facility, as detailed in this Plan.
 - Ensure the requirements and processes laid out in this plan are followed by site Personnel.
 - Participate in the development, administration, execution, and update of the plan.
 - Oversee the day-to-day operation of the Coniglio facility
 - Ensure annual drill requirements are met and submit evidence to Coniglio upon completion and request.
 - Ensure plan training is completed by all relevant Personnel and submit evidence to Coniglio upon completion and request.
 - Participate in training and drills/exercises.
 - Provide evidence to Coniglio Compliance Manager upon completion and request.

5.3 DEPCOM Field Services

- 5.3.1 Role Contracted to perform the O&M services at the Coniglio Facility.
- 5.3.2 Responsibilities include:
 - Follow the requirements and processes documented in the Plan.
 - Provide feedback on potential impact(s) to operations of an incident and proposed responses.
 - Participate in responses to emergency events at the Coniglio facility.
 - Conduct plant readiness reviews and provide reports to District Manager and Compliance Manager.
 - Participate in training and drills/exercises.
 - Participate in post-incident reviews.

5.4 DEPCOM Operating Personnel

- 5.4.1 Role The Operator for the Coniglio facility.
- 5.4.2 Responsibilities include:

- Operates the Coniglio site from the DEPCOM operations center in Scottsdale, Arizona.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Coniglio upon completion and request.
- Participate in training and drills/exercises.
- Participate in post-incident reviews.

6.0 CRITICAL FAILURE POINTS - EQUIPMENT

Coniglio has identified the following potential critical failure points and has planned remediation for each item, as noted.

ltem	Quantity	Remediation
138 kV, 3000-amp Circuit Breaker	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
138 kV Switch, air-break	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
138 kV/34.5 Main Power Transformer	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
34.5 kV 1200 A Circuit Breaker	Four (4)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Sungrow SG3150U-MV Inverter	Forty-Two (42)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
FTC Solar Voyager Tracker		Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Q Peak Duo Modules LG8.3	404,712	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Communications Equipment Enclosure SCADA, Fiber, Alarms	One (1)	Ensure that enclosure is secured and all devices are operating as installed

7.0 CRITICAL FAILURE POINTS – PERSONNEL (STAFFING)

Emergency Operations Plan

BT Coniglio Solar, LLC – Emergency Operations Plan, Version #2.0

DEPCOM and Coniglio have identified the following potential site and Operation Control Center critical failure points and has planned remediation for each role, as noted. There will be no additional staffing prior or during a severe weather events/conditions, but DEPCOM is able to mobilize additional Field Services technicians, managers and/or contractors to supplement site team, as needed.

Role	Notes	Remediation
Example: Field Technicians	There are typically three (3) on-site plant service technicians.	If all field technicians are unavailable, additional personnel may be dispatched, as approved by the District Manager, for relocation to supplement facility staffing.
Field Technicians	1 Field Technician onsite	If all field technicians are unavailable, additional personnel may be dispatched, as approved by the District Manager, for relocation to supplement facility staffing.
District Manager	1 District Manager	If the District Manager is unavailable, the Regional Maintenance Manager will assist.
Operations Center	24-Hour Operations, Staffed with 1-5 operators depending on time of day	

8.0 SEVERE WEATHER PLANNING AND IDENTIFICATION

Severe weather can negatively impact the Coniglio facility. Events and disturbances that can occur in and around the facility include but are not limited to windstorms, severe thunderstorms, flooding, tornadoes, excessive heat, excessive cold, snowstorms, and ice storms. These weather events can be detrimental to the employees and or equipment and structures at the facility. Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization plans, to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those plans.

Note that the nature of solar facilities is such that if there is no irradiance, the plant will shut down energy production, therefore output during some seasonal weather events (e.g. snow or heavy cloud-cover) is reduced or terminated. Post-event, the District Manager and Field Services technicians will assess the damage and report the current generating capability of the site (priority for recovery of generation capacity) to DEPCOM Operating Personnel.

8.1 Pre-season planning

Emergency Operations Plan

Ahead of each summer and winter season, the District Maintenance Manager ensures that the appropriate weatherization plan is reviewed, and the pre-season preparedness checklists are completed, signed, and provided to the Regional Lead Manager. Annual review of the checklists is documented and stored in specified database or information repository. This activity coincides with the required ERCOT reporting, per the Nodal Protocols. Checklists specific to Winter and Summer Weatherization Plans are contained within those specific documents. For event response checklists for other scenarios, see the appropriate Attachment included in this Plan.

8.2 Seasonal events

Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Regional Lead and Operating Control Center Personnel are responsible for keeping abreast of forecasted severe weather events and reporting potential issues to the Regional Lead manager and has several means to monitor these weather-related emergencies, including:

- Internet access to weather-related websites;
- Onsite weather and telemetry systems;
- AM/FM radio to monitor local news;
- National Weather Service; and
- National Oceanic and Atmospheric Administration (NOAA)

When information is received that a severe weather event such as a tornado, severely cold weather, severely hot weather, or flood watch has been issued for the facility area, the following actions shall be taken:

- 1. The on-site Field Technicians should notify the District Maintenance Manager.
- 2. With input from the District Maintenance Manager or Operating Personnel, the Owner of the facility shall make a determination whether or not the plant should be shut down due to the potential weather event(s).

The Winter Weatherization Plan and Summer Weatherization Plan contain the inventory of prearranged supplies needed for emergencies. These plans are separate documents from this Plan.

8.3 Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the plant administrative building, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility and maintain communications with the District Maintenance Manager, Operating Personnel, and others.

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8.4 Evacuation Zone

Per the Texas Department of Emergency Management (TDEM), the Coniglio facility is not in a TDEM evacuation zone.³

9.0 **RESTORATION RESPONSE TIME**

There is an automatic transfer switch that connects normal stations service power to a backup utility feed at the Coniglio facility that initiates when station service is lost. The site substation will have automatic failover power to the equipment in the substation via battery supplied DC power.

In the event of a power outage, the site will not be able to generate solar power, until a field service representative performs a site assessment and manually closes breakers. The target response time for this scenario is two (2) hours after weather or safety conditions permit.

10.0 REQUIRED EMERGENCY OPERATIONS PLAN TESTING

10.1 Requirement for an Annual Drill

The PUCT requires that Coniglio conduct or participate in one or more drills annually to test its emergency procedures if its emergency procedures have not been implemented in response to an actual event within the last 12 months.⁴

10.2 Testing

- 10.2.1 This Plan is tested at least once every 12 months to validate the contents and procedures in this plan. Testing may be accomplished by either of the following:
 - Responding to an actual event in the preceding 12 months (i.e. since the last drill or event); or by
 - Conducting a planned exercise/drill.
- 10.2.2 EOP drills must follow this Plan.
- 10.2.3 The District Maintenance Manager will ensure that a drill of this plan occurs annually. Upon completion of the drill, the District Maintenance Manager will provide evidence of completion to the Compliance Manager.

10.3 Drill Requirements

³ <u>http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf</u>

⁴ §25.53, Subchapter C, Item (d), page 3

- 10.3.1 The content of each drill will be based on current needs and will be determined by the District Maintenance Manager with input from the Compliance Manager, as needed.
 - 10.3.1.1 The annual drill must include a documented evacuation of the O&M/Substation control building (if applicable).
- 10.3.2 A roster of drill attendees and the date the drill was conducted will be filed with this plan and retained in the Coniglio document repository.
- 10.3.3 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provided to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

10.4 EOP Updates

- 10.4.1 Following the annual drill, the effectiveness of the drill and this Plan will be assessed and the Plan updated, as needed based on feedback received and provided to the Compliance Manager by the District Maintenance Manager.
- 10.4.2 Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the Coniglio EOP evidence.

11.0 ANNUAL TRAINING AND PLAN REVIEW

All Personnel (inclusive of appropriate Coniglio employees, O&M personnel, and GOP personnel) shall receive training on this *Emergency Operations Plan* (EOP) whenever it is modified or on at least an annual basis. Employees will also be trained when this plan is initially implemented.

12.0 EMERGENCY CONTACT INFORMATION⁵

Coniglio is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, Coniglio must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form.

13.0 REQUIRED ANNUAL REPORTING

⁵ §25.53, Subchapter C, Item (e), page 3

13.1 Requirement to File Updated EOP with ERCOT and PUCT

- 13.1.1 Both ERCOT and the PUCT require that Coniglio file any updated version of this Plan within specific timeframes.
- 13.1.2 PUCT has an additional requirement that significant changes must be filed no later than 30 days after the changes take effect.

Summary Table of Filing Requirements			
Changes during this time period:	Must be filed with by:		
November 1 through April 30	June 1		
May 1 through October 31	December 1		
Significant changes made at any time	No later than 30 days after the changes take effect		

13.2 ERCOT Nodal Protocol Requirements

- 13.2.1 ERCOT Nodal Protocols 3.21(1)⁶ requires Coniglio, as a Resource Entity, to provider ERCOT with a complete copy of the emergency operations plan for each Generation Resource under the Resource Entity's control. For any jointly owned Generation Resource, the emergency operations plan shall be submitted by the Master Owner designated in the Resource Registration process. Each Resource Entity shall provide ERCOT with any updated versions of the 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. Resource Entities shall submit all plans and updates electronically.
- 13.2.2 Coniglio maintains separate plans to address summer and winter weatherization. As such, Coniglio, as a Resource Entity, is <u>required to provide ERCOT with any</u> <u>updated versions of the weatherization plan by June 1 for any updates made</u> <u>between November 1 and April 30, and by December 1 for any updates made</u> <u>between May 1 through October 31</u>. Resource Entities shall submit all such plans and updates electronically.⁷

13.3 PUCT Requirements

⁶ ERCOT Nodal Protocols, Section 3: Management Activities for the ERCOT System

⁷ ERCOT Nodal Protocols, Section 3, §3.21(2)

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- 13.3.1 PUCT Substantive Rule §25.53(b) requires a market entity to file a copy of its emergency operations plan (or a comprehensive summary thereof) before it begins commercial operations. A power generation company (PGC), such as Coniglio, that makes a significant change to its plan between November 1 through April 30 must file that change by June 1. For a significant change that occurs between May 1 through October 31, the change must be filed by December 1.
- 13.3.2 If significant changes are made to this Plan, Coniglio Compliance Manager will file the revised plan or a revision to the comprehensive summary (if one was previously provided) no later than 30 days after the changes take effect.
 - 13.3.2.1 A significant change includes, but is not limited to, a change that has a material impact on how Coniglio would respond to an emergency.

14.0 RESOURCES AND RELATED REFERENCES

Coniglio Pandemic Plan

Coniglio Summer Weatherization Plan

Coniglio Winter Weatherization Plan

ERCOT

ERCOT Nodal Operating Guides webpage:

http://www.ercot.com/mktrules/guides/noperating/current

• Relevant document: Section 3: Management Activities for the ERCOT System

Public Utility Commission of Texas

Electric Substantive Rules: Chapter 25 Rules webpage: <u>https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx</u>

Section 25.53 - Electric Service Emergency Operations Plans: https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.53.pdf

Emergency Contact Annual Report and Form:

Report: <u>http://puc.texas.gov/industry/electric/forms/emcont/EC_Forms.aspx</u>

Form: <u>https://www.google.com/url?client=internal-element-</u> cse&cx=000307803513926048484:gdphiulqjs4&q=https://www.puc.texas.gov/storm/conten</u> ts/media/Contacts_Form.pdf&sa=U&ved=2ahUKEwi0rdb79vsAhVLXM0KHVvnBmsQFjAAegQIAhAC&usg=AOvVaw1gFBbTvRpzvUMqm9Fs358D

National Oceanic and Atmospheric Administration (NOAA) webpage: <u>https://www.noaa.gov/</u>

National Weather Service website: https://www.weather.gov/

Ready.gov – Disasters and Emergencies webpage: list of event type and response actions (e.g. hurricane, tornado, flood, etc.): <u>https://www.ready.gov/be-informed</u>

DOCUMENT OWNERS

Entity	Title	Name
BT Coniglio Solar	Owner's Representative	Robert Olney
Radian Generation	Compliance Manager	Rush Ferrell

DISTRIBUTION LIST

Entity	Title	Name
BT Coniglio Solar	Owner's Representative	Robert Olney
Radian Generation	Asset Manager	Shelley Coffman
Radian Generation	Compliance Manager	Rush Ferrell
DEPCOM	VP Plant Services	Noah Pennington
DEPCOM	Director Plant Ops	Jimmy Hood
DEPCOM	O&M Business Manager	Rocky Armenta
DEPCOM	Regional Maintenance Manager	Alex Dominguez
DEPCOM	East Texas District Maintenance Manager	Caleb Cox

APPROVALS

The approval signatures in this section indicate review of the document and approval to publish.

Name	Date	Signature
Robert Olney, BT Coniglio Solar		

AFFIDAVIT OF EOP FAMILIARITY AND USE

All relevant Coniglio, DEPCOM Field Services, and DEPCOM Operating Personnel are familiar with the contents of this Plan and are committed to following it, except to the extent deviations are appropriate under the circumstances during an emergency.

Name	Title	Date	Signature

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Name	Title	Date	Signature
limmy llood	Director of		
	Plant Ops.		
Robert Olney	Owner's		
Robert Onley	Representative		
r 			*

VERSION HISTORY

Version Effective Date		Author	Description of Changes
			Updated personnel changes on Page
2.0	3/15/23	Radian , Coniglio, DEPCOM	14. Updated Emergency Contacts on
			Page 17
1.0	7/15/21	Radian , Coniglio, DEPCOM	New plan

STATEMENT OF COMPLIANCE

It is noted that this Emergency Operations Plan was prepared on Click or tap to enter a date. by BT Coniglio Solar, LLC.

Thus, I hereby state that BT Coniglio Solar, LLC has evaluated the requirements of all applicable State and Federal Laws and recognize that this Plan has been prepared in accordance with the requirements therein.

∠ Signature

3/8/23 Date

Jae Kyu Lee

Printed Name

President Printed Title

ATTACHMENT 1: DESIGNATION OF EMERGENCY COORDINATORS

The Coniglio Emergency Coordinator is responsible for specific actions detailed in this plan (as noted). Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

Coniglio Emergency Coordinators			
Primary Emergency Coordinator	Name: Robert Olney Title: Owner's Representative Phone number: 415-299-9991		
Alternate Emergency Coordinator	Name: Richard Hrabal Title: Owner's Representative Phone number: 832-483-1170		
DEPCOM Control Room Emergency Coordinators			
Primary Emergency Coordinator	Name: Depcom Remote Operations Center Phone number: (480) 489-1107		
Alternate Emergency Coordinator(s)	Name: Alex Dominguez Title: Regional Maintenance Manager Phone number: (432) 290-1076 Name: Caleb Cox Title: East TX District Manager Phone number: (903) 703-9692		

ATTACHMENT 2: EMERGENCY CONTACTS

In the event of a fire emergency, medical emergency, police emergency or weather-related emergency, ensure that the following roles are notified after emergency responders are contacted.

Title	Name	Phone Number
Coniglio Compliance Manager	Robert Olney	805-717-1661
DEPCOM Regional Manager	Alex Dominguez	432-290-1076
DEPCOM East Texas District Manager	Caleb Cox	903-703-9692
Operation Control Center Manager	Peter Jager	720-926-1548
DEPCOM Operations Control Center	Operator	480-270-6916
Field Services Manager or Lead	TBD	

ATTACHMENT 3: CONIGLIO GENERAL EMERGENCY PROCEDURE

Coniglio Location for Outside Emergency Responders

Coniglio BT Coniglio Solar, LLC is located at	956 County Road 3745, Wolfe City, Texas
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General Emergency Procedures

This emergency plan was developed for the following plausible contingencies that could transpire at the facility:

- 1. Personnel injuries and serious health conditions
- 2. Fires
- 3. Chemical releases
- 4. Weather-related causes
- 5. Threats to the facility that warn of danger to personnel
- 6. Pandemics
- 7. Sabotage Reporting
- 8. Other unanticipated events

It will be the responsibility of the District Manager or lead Site Technician to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages. In the event of an emergency, the following actions will be immediately performed:

If the event is a fire, medical, or police emergency, contact 911 immediately.

General Emergency Protocols

- 1. Any work-related permits in affect shall be immediately voided, and personnel involved in such work shall cease all activities onsite.
- 2. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.
- 3. Based upon the type and extent of the emergency, the Plant Lead Technician should assess whether an evacuation should be initiated. The following criteria should be considered in rendering a decision to conduct an evacuation of the facility:
 - a. The affected parts of the facility and severity of the emergency.
 - b. Restrictions in egress routes caused by the emergency.

- c. Wind direction (if the emergency involves gases/vapors)
- d. People currently located at the facility (employees, visitors/contractors, etc.)
- 4. If the District Maintenance Manager or lead Site Technician determines that a facility evacuation is necessary, s/he must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

a) Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel. *In this type of evacuation, operating area personnel should evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible.* This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

b) Delayed Site Evacuation

This type of evacuation would be used in a serious emergency situation where nonessential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility. The District Manager and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the facility. *If personnel will not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.*

***NOTE**: Although the District Manager or lead Site Technician (or Facility Emergency Coordinator) may initially designate an evacuation to be a Delayed Site Evacuation, s/he should always keep in mind that conditions may change rapidly and result in the need to call for an Immediate Site Evacuation.

- 5. The District Maintenance Manager or lead Site Technician onsite will determine if an evacuation is necessary.
- 6. Evacuation will be coordinated via the two-way radios. Teams will be alerted is an evacuation has been directed. If an evacuation has been directed, the District Manager or lead Site Technician shall ensure that instructions for evacuation are communicated to personnel over the cellular devices or hand-held radios. These instructions should include the following items at a minimum:

- a. The type of evacuation to be performed
- b. Immediate Site Evacuation
- c. Delayed Site Evacuation
- d. The nature of the emergency
- e. The location(s) of the emergency
- f. Any egress routes that should not be used by evacuating personnel (if known and applicable)
- If an evacuation has been ordered, personnel shall follow either the Immediate Site Evacuation Procedures or Delayed Site Evacuation Procedures contained in Attachment 4, as appropriate, and based upon the direction of the District Maintenance Manager, lead Site Technician and/or Facility Emergency Coordinator.
- 8. Perform the appropriate follow-up procedure(s) below, based upon the type of emergency that is occurring:
 - Personnel Injuries/Health Conditions (Attachment 5)
 - Fire (Attachment 6)
 - Chemical/Oil Spills and Releases (Attachment 7)
 - Weather-related Emergencies (Section 8.0 and the appropriate Summer or Winter Weatherization Plan)

ATTACHMENT 4: EVACUATION PROCEDURES

Immediate Site Evacuation Procedure

- 1. Personnel present on-site shall immediately take the following actions:
 - a) Locate and obtain the visitor/contractor sign-in sheet.
 - b) Gather at the front entrance gate at facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Attachment 3).

***NOTE:** The primary muster area must be a predetermined location, with any alternate muster areas selected only when egress routes to the primary muster area are unsafe to proceed along.

- c) Pass the following information over the plant radio system:
 - 1) The muster area the employees will be proceeding to.
 - 2) Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).
- d) Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area. Personnel on-site should not delay in evacuating or wait on other personnel that they anticipate may arrive.
- e) Upon arriving at the designated muster area, the group shall designate a Person- in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.
- f) After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for. The Person-in-Charge will then query by radio for personnel who are unaccounted for. The Person-in-Charge shall then establish cellular or radio communication with the Emergency Coordinator (if applicable) and relay information on personnel who are not accounted for.
- g) All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location. The "ALL CLEAR" signal will be communicated by radio or cellular telephone.
- h) The Person-in-Charge shall continuously monitor the emergency situation when at the muster location.

- 2. Personnel present in the field/substation area shall immediately perform the following actions:
 - a) Proceed to the designated muster area unless the egress route to the muster area is not safe for travel. In such a case, proceed to an alternate muster area.
 - b) Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated muster area.
 - c) Upon reaching the appropriate muster area, report to the Person-in-Charge and continue to monitor the emergency situation and communicate as appropriate. If no other personnel are present at the muster area upon arrival, communicate to the Plant Lead Technician that no other personnel are present in the area.
- 3. Personnel not in the operating areas of the plant (to include the parking areas) shall immediately perform the following actions:
 - a) Proceed to the designated muster area.
 - b) A Person-in-Charge shall be designated for the muster area. In many cases, this will be the Emergency Coordinator. The Person-in-Charge shall establish communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.
 - c) If the Emergency Coordinator is not present at the muster area, the Person-in-Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives. In the event that the Emergency Coordinator is in plant operating areas or has proceeded to the alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency

Delayed Site Evacuation Procedures

- 1. Personnel present on-site at the O&M building shall immediately take the following actions:
 - a) Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.
 - b) Locate and obtain the visitor/contractor sign-in sheet
 - c) Communicate names of visitors/contractors currently in the operating areas to outside operating personnel. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.
 - d) When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the O&M building, the Plant Lead Technician (or

Emergency Coordinator, as appropriate) shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route.

- e) Notify the Emergency Coordinator of the current facility status, and evacuation details.
- f) Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.
- g) Once the shutdown has been completed, all essential personnel shall gather in the O&M and take roll call. When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel. In such a case, proceed to the alternate muster area.
- 2. Personnel present in the field/substation area (other than the O&M building) shall immediately perform the following actions:
 - a) Continuously communicate for information and instructions.
 - b) Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.
 - c) Locate and direct non-essential personnel to proceed to the O&M building immediately.
 - d) Perform facility shutdown instructions as directed by the Plant Lead Technician.
 - e) Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the muster point for instructions.
- 3. Personnel not in the operating areas of the facility (to include the O&M building and parking areas) shall immediately perform the following actions:
 - a) Locate and obtain all immediately accessible hand-held radios. (b) Proceed to the designated muster area (see Site Map).
 - b) A Person-in-Charge shall be designated for the muster area. The Person-in- Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.
 - c) The Person-in-Charge at the designated muster area will coordinate with outside responding agency activities, and provide assistance (to include personnel, resources, and administrative functions) to the O&M building as directed by the Emergency Coordinator and/or Plant Lead Technician/Lead technician.
- 4. The Emergency Coordinator shall immediately perform the following actions:
 - a) Proceed to the O&M building or to the location on the facility most appropriate for directing response actions for the emergency.

- b) Coordinate actions related to the emergency and provide directions to muster area.
- 5. Persons-in-Charge
 - a) If the emergency escalates in severity or if there is immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

- The Designated Muster Area is the primary gathering point for personnel and should be used during evacuations unless the emergency has rendered egress routes to the Muster Area unsafe for travel.
- The Alternate Muster Area is the alternate gathering point for such circumstances.
- Alternate muster location will be communicated at the time of evacuation and will take into consideration the event occurring that is causing the evacuation

Designated Muster Area	Main gate
Alternate Muster Area	Secondary gate

ATTACHMENT 5: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to <u>call 911 to initiate the response of trained outside medical responders</u>. To prepare facility personnel for such contingencies, it will be the facility policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the facility at the designated location in the Substation Control House.

Note: Severe weather condition-related injuries are covered in the appropriate (Summer or Winter) Weatherization Plan.

Basic First Response Actions

- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
- <u>If the person is unresponsive, immediately call 911 for outside medical assistance and ask</u> <u>other personnel to bring the AED to the scene</u>. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions should be commenced.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim, and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, *do not attempt to move the victim*. Make the victim as comfortable as possible and

Internal

apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.

- Immobilize all injured parts of the victim.
- Prepare victim for transportation if the victim can be safely moved

Physical Shock

<u>Symptoms</u>

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

<u>Treatment</u>

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

Electric Shock

Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

<u>Treatment</u>

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR and call for an AED, if required.

Burns

Symptoms

• Deep red color; or

QCELLS

- Blisters; or
- Exposed flesh.

<u>Treatment</u>

- Cooled immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

ATTACHMENT 6: FIRE RESPONSE PLAN

The BT Coniglio Solar, LLC facility maintains this fire response plan which describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of plant personnel and minimize damages to plant equipment and the surrounding environment.

- 1. Any person who discovers a fire in the facility should immediately make radio/phone contact with the District Manager or lead Site Technician, and provide the following information:
 - a) That a fire has been discovered.
 - b) The location and source of the fire.
 - c) Any injuries that have occurred
 - d) The cause of the fire (if known)
 - e) Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

***NOTE**: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a plant communications. If the person can quickly extinguish the fire, he/she should do so first, then report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the **immediate action is to notify others, evacuate the area, and get help**.

- 2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire is in its incipient stage if it meets two primary criteria:
 - a) The fire can be extinguished or controlled with a single portable fire extinguisher; and
 - b) The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
- 3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. *Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only*. (Note: All field/plant personnel will be provided with

initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility. The *Fire Extinguisher Plot*, detailing the location of portable fire extinguishing equipment deployed at the facility, is provided at the end of this attachment. Additionally, the *Fire Hydrant/System Plot* details locations of key fire hydrants near or on the facility.)

- 4. In response to the fire, the Plant Lead Technician/Lead Technician will need to make the following determinations:
 - a) The equipment or activities that need to be shut down and/or ceased.
 - b) If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

Fire Extinguisher Deployment Plot – Admin/Water Treatment Areas

- Coniglio has the following Fire Extinguishers onsite:
 - 2 fire extinguishers located in the substation control building
 - o DEPCOM Field Technicians carry fire extinguishers in vehicle
 - DEPCOM UTV
 - Storage conex
- All Extinguishers are Dry Chemical Extinguishers

ATTACHMENT 7: CHEMICAL OR OIL SPILLS AND RELEASES

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

 If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) *if it can be stopped without incurring additional personal exposure to the substance*. An example of this might be the following:

Example: A person opens the drain value on a line that results in an unexpected release. If the person can immediately stop the release by closing the value, this action should be taken if no additional exposure to the chemical will occur by doing so.

- 2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area (if remaining within observation distance is safe under prevailing conditions; if in doubt, do not risk exposure leave the area.).
- 3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The District Maintenance Manager or lead Site Technician should be notified immediately. Information provided should include all the following that are known:
 - a) What type of chemical has been spilled/released?
 - b) The location(s) of the spill/release.
 - c) If the source of the spill/release has been stopped
 - d) If any injuries or chemical exposure has occurred to personnel.
 - e) Boundaries describing the area of the spill.
 - f) Whether or not the spill is contained.
 - g) Quantity released.
 - h) Environmental Impacts (water bodies, streams, ground, roadways).
- 4. Based upon the report from the person discovering the spill, the District Maintenance Manager or lead Site Technician shall evaluate whether the circumstances pose a threat to

the surrounding community or the environment. *If a threat is imposed to the community or environment, 911 should be notified immediately.*

- 5. The District Maintenance Manager or lead Site Technician shall decide as to whether the spill/release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the District Maintenance Manager or lead Site Technician shall use the Spill Prevention Control and Countermeasure Plan (SPCC). The District Maintenance Manager or lead Site Technician shall ensure that all required notifications are made.
- 6. While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any plant drains that are near the location of the spill. *This should be performed only if it is safe to do so without risking chemical exposure*.
- 7. The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to avert others from inadvertently approaching the spill area. *This should be performed only if it is safe to do so without risking chemical exposure.*
- 8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.
- 9. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the District Manager or lead Site Technician shall immediately proceed to the spill area to evaluate the severity of the incident. NOTE: IF ANY PERSONNEL ARE DISCOVERED TO BE UNCONSCIOUS OR OTHERWISE INCAPACITATED UPON APPROACH TO THE SPILL SCENE, ALL PERSONNEL MUST IMMEDIATELY BACK AWAY TO A SAFE DISTANCE FROM THE UNKNOWN THREAT.
- 10. The District Maintenance Manager or lead Site Technician shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform). The adequacy or need for PPE should also be assessed. Upon completing this assessment, the District Manager or lead Site Technician shall notify/inform the Facility Emergency Coordinator of the status of the emergency.
- 11. Once the District Maintenance Manager, lead Site Technician, or Emergency Coordinator, as appropriate, has determined that adequate containment and barricading of the spill area exists, he/she shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill. This observer shall perform radio status checks a minimum of once every three minutes until outside responders arrive for cleanup/mitigation actions.

ATTACHMENT 8: THREATS TO THE FACILITY

In the event the site receives threatening correspondence either by phone or by other means of communications, the following actions should be performed immediately:

Actions by the person receiving the threat:

- 1. Gather as much information as possible from the person making the threat. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted. If the threat is being made verbally (phone, or other), communicate and obtain information from the individual making the threat for as long as possible.
- 2. Inform the District Maintenance Manager or lead Site Technician of the situation.

The District Maintenance Manager or lead Site Technician may consider any or all the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

- 1. Order an evacuation of the facility.
- 2. Call 911 for Police or Fire Assistance.
- 3. Arrange for additional security personnel for the facility.
- 4. Direct plant personnel to commence a controlled shutdown of the facility.
- 5. Direct searches to be performed on vehicles entering the facility.

ATTACHMENT 9: SABOTAGE REPORTING

1. Dial 911

- 2. Communicate the sabotage event to all on-site personnel.
- 3. Contact Control Center Personnel to report the sabotage and coordinate reporting.



March 7, 2023

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

Subject: Confidential Filing – BT Coniglio Solar, LLC - Emergency Operations Plan Filing for PGC Registration #20588

Dear Filing Clerk,

Pursuant to PUC Substantive Rule 25.53, BT Coniglio Solar, LLC submits an affidavit executed by the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the below.

Statement of compliance: BT Coniglio Solar, LLC attests that it is fully compliant with all requirements under PUCT Rule 25.53. An executive summary with specific references to the EOP is attached with this affidavit.

Reviewed and affirmed by:

By:

Name: Jae Kyu Lee Title: President

Hanwha Q Cells USA Corp.