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Approvals

The CenterPoint Energy Houston Electric (CEHE) Emergency Operations Plan (EOP) will be reviewed by the Emergency Preparedness & Response Department based on the maintenance and revision schedule established for this plan. Upon completion of review and any revisions, the EOP is submitted and ultimately reviewed and approved by the Senior Vice President Houston Electric and Senior Vice President and Deputy General Counsel.

This Plan was approved and implemented on March 15, 20254.

This supersedes and rescinds all previous versions of this document.

Record of Changes

Date of Change	Version
April 18, 2022	1.0
March 15, 2023	1.1
March 14, 2024	2024*
March 15, 2025	2025

*Version history changed to reflect the plan year for consistency of updates.

Table of Contents

1. Purpose and Scope

1.1. Purpose

The CenterPoint Energy Houston Electric (CEHE) Emergency Operations Plan (EOP) is a framework for a coordinated response to incidents, emergencies, and cCrises (referred to as emergencies throughout this document). This plan provides an incident management system for all emergencies that CEHE may encounter. This EOP operates in conjunction with the CenterPoint Energy ~~Crisis~~ Corporate Response Plan (CRP). The CRP establishes the structure, and the EOP establishes the emergency response organization and procedures. Using the Incident Command System (ICS) as its methodology, the EOP facilitates goal- and objective-based responses to emergencies, guided by the roles and responsibilities established in the EOP.

The incident management structure in this plan is scalable and may expand or contract based on the emergency. It is flexible to meet the needs and intricacies of each emergency. Its goal is to assess and respond to any given emergency to manage and mitigate the safety, operational, regulatory, financial, reputational, legal, and other business risks of an emergency effectively and agilely.

This plan is based on a worst-case scenario and provides for the critical roles and functions of CEHE and its parent, CenterPoint Energy, Inc., during an emergency. However, it may not address specific needs for all departments and operations. Departments shall develop any additional plans or procedures necessary for regulatory requirements or to meet specific operational objectives during an emergency beyond this framework.

This plan provides guidelines and a framework for emergency organization, communications and information management, decision-making, response operations, resource management, and recovery operations.

1.2. Scope

The measures in this plan will be enacted for any event or circumstance that impacts CEHE Operations and requires resources and other support greater than normal daily operations to protect safety, property, critical operations, and/or the environment. Generally, there are three types of events:

Incidents: An occurrence or event—natural, technological, or human-caused—that requires a response to protect life, property, or the environment and/or restore operations. Typically does not extend beyond normal day-to-day operational capabilities.

Emergencies: Any incident, whether natural, technological, or human-caused, that requires responsive action to protect life or property, or the environment and/or restore operations. Typically extends beyond normal day-to-day operational capabilities.

Crisis: An occurrence of a natural catastrophe, technological accident, or human-caused emergency that has resulted in severe property damage, deaths, and/or multiple injuries, significant property or environmental damage, or significant disruptions to operations. For CenterPoint Energy this can include emergencies happening simultaneously at different enterprise locations or involving multiple operation functions and those occurring for prolonged periods.

This plan applies to all CEHE locations, operations, and employees and supersedes any and all prior emergency plans. Should an emergency impact, or be expected to impact, any CEHE location or operation, CenterPoint Energy will implement the components of this plan.

1.3. CenterPoint Energy

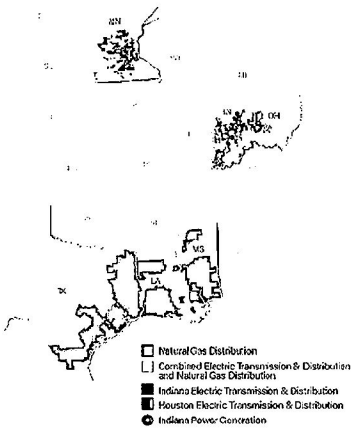
CenterPoint Energy, Inc., headquartered in Houston, Texas, is a domestic energy delivery company that includes electric transmission & distribution and natural gas distribution. With more than 8,900 employees, CenterPoint Energy and its predecessor companies have been in business for more than 140 years.

1.3.1. Gas Operations

CenterPoint Energy sells and delivers natural gas to approximately 4 million homes and businesses in six states: Indiana, Louisiana, Minnesota Mississippi, Ohio, and Texas (including greater Houston area).

1.3.2. Electric Transmission and Distribution and Power Generation

CenterPoint Energy maintains the wires, poles and electric infrastructure serving more than 2.8 million metered customers in the greater Houston area and in southwestern Indiana.



CNP also owns and operates nearly 1,300 megawatts of electric generation capacity in Indiana.

1.4. Regulations and Authorities

The CEHE Emergency Operations Plan is governed by the following regulations and authorities:

- The Public Utility Commission of Texas (PUC) Substantive Rules – Chapter 25
  - P.U.C. Subst. R. §25.53
- North American Electric Reliability Corporation (NERC)
  - EOP-011-2 Emergency Preparedness and Operations

2. Assumptions

This plan is an "all-hazards" plan and is intended to address any emergency situation that may arise and impact CEHE Operations. This plan is based on a set of planning assumptions or assumed operational conditions that provide a foundation for establishing protocols and procedures. These assumptions are listed below:

- Critical lifeline utilities may be interrupted, including water delivery, electrical power, natural gas, telephone communications, radio systems, cellular telephones, and information systems.
- Regional and local services may not be available.
- Major roads, overpasses, bridges, and local streets may be damaged.
- Buildings and structures, including homes, may be damaged.
- Damage may cause injuries and displacement of people.

- Normal suppliers may not be able to deliver materials.
- Emergency conditions that affect CenterPoint Energy locations will likely affect the surrounding community, city, or county.
- CenterPoint Energy will need to conduct its own situation analysis and deployment of on-site resources and management of emergency operations, through the CenterPoint Energy Emergency Operations Center (EOC) and Crisis Management Committee (CMC), if needed, while emergency conditions exist.

3. Concept of Operations

3.1. Threat and Hazard Monitoring

In order to respond effectively and in a timely manner, CEHE must maintain awareness and identify when threats and hazards are forecasted to impact operations.

Emergency Preparedness & Response (EP&R) collaborates with CEHE Operations, Enterprise Risk Management, Corporate Security, Safety, and many other departments to monitor potential threats and hazards that could affect all CNP operations including CEHE.

EP&R monitors natural hazards including hurricanes, tornadoes, extreme heat and cold weather, drought, wildfires, flooding, and others. CEHE has an in-house meteorologist who provides continuous weather monitoring and provides updates to CEHE and other leadership as appropriate. These natural hazards are forecasted, as appropriate, and communicated to CNP leadership when ~~their~~ they have the potential to impact to CEHE Operations ~~is likely~~.

When CEHE receives a weather warning, weather watch, weather advisory, or a non-weather-related alert, EP&R will begin to take pre-emergency actions. These actions can include:

- Distributing the Emergency Monitoring Report
- Confirming CEHE Operations is evaluating its emergency plans and updating the Preparedness Report
- Evaluating the need for/scheduling an Operational Alignment Call, if necessary

3.1.1. Emergency Monitoring Report

The Emergency Monitoring Report is designed to provide awareness and forecasting for the potential impact of the emergency. This report is distributed by EP&R to leaders across the company to alert them to the potential impact and to prepare to respond if necessary.

3.1.2. Preparedness Report

The Preparedness Report provides a pre-emergency status update of the staffing, resource, and operational plan for when the hazard is likely to impact operations. This report is updated as forecasting changes and the hazard impact timeframe draws near.

CenterPoint Energy

Electric Operations

Current Emergency Level: 4

Preparedness Report
February 1, 2024 3:00 PM Update

Hazard Highlights

- An upper-level low will swing into Texas late Fri. & into Sat. AM & bring a Pacific cold front to the CEHE area.
- Isolated showers and storms will begin moving in from the west late Fri. & then become more widespread to likely after midnight, into early Sat. AM.
- There is a Marginal Risk of severe weather early Sat. AM as waves of storms move through the region. A few storms may go severe, and all thunderstorm hazards are possible. Given the early morning hours, hazards associated with storms will be low. Timeframe for severe storms should be with frontal passage around 3-9AM.
- River, stream, and creek flooding will the greatest hazard, along with low-lying areas with a good portion of us receiving 1-2 inches of rain. Isolated spots may receive less, with some spotty areas receiving 2-3+ inches as well. A Marginal to Slight Risk of Excessive Rainfall is outlined for CEHE by the Weather Prediction Center.

Preparedness Update

Based on the forecast for Friday night/Saturday morning, we are prepared to hold Friday evening crews if necessary and are increasing daytime staffing at all centers on Saturday/Sunday. Additionally, troubleshooters will be starting at 6am Saturday morning to provide added support. The call-out process will be utilized in the event additional staffing is needed. IC team is closely monitoring outage count and weather and will make determination on any adjustments to the plan.

Staffing Update

		GPT	HUM	SPB	BEL	CYP	KTY	SUG	FTB	BRZ	GAL	SCH	BAY
Normal Staffing	Weekday normal operational staffing level. Weekends and nights remain minimal staffing. No increased external crews needed.												
Increased Staffing	Weekday normal operational staffing level. Weekends and nights staffing levels increase to "full status" for hazard forecasted areas. Additional external crew needs are assessed.	GPT	HUM	SPB	BEL	CYP	KTY	SUG	FTB	BRZ	GAL	SCH	BAY
Critical Staffing	Weekday normal operational staffing level. Weekends and nights staffing levels increase to "extra status" for hazard forecasted areas. Additional external crews are secured. Additional Supervisors for appropriate span of control.	GPT	HUM	SPB	BEL	CYP	KTY	SUG	FTB	BRZ	GAL	SCH	BAY
All Hands Staffing	All employees report for duty. Vacations canceled. Additional external crews are secured. Mutual assistance crew needs are assessed. Additional Supervisors for appropriate span of control.	GPT	HUM	SPB	BEL	CYP	KTY	SUG	FTB	BRZ	GAL	SCH	BAY

Pre-Incident Resource Needs

- No staging sites necessary.

Mitigation Efforts

- When necessary, resources will be shifted to support needs in other service areas.
- Closely monitoring weather reports. Additional StormGeo weather call being scheduled for Thursday afternoon.

Additional External Staffing

- No additional needed at this time. "Call-out" process will be used if necessary.

Schedule

Preparedness Report will be updated on an As-Needed basis for staffing changes.
No scheduled Briefings

CenterPoint Energy

Weather Forecast
February 1, 2024 11AM Update

Current Emergency Level: 4

UPDATE

Important Forecast Updates

- An upper-level low will swing into Texas late Friday and into Saturday morning and bring a Pacific cold front to the CEHE area.
- Isolated showers and storms will begin moving in from the west late Friday and then become more widespread to likely after midnight, into early Saturday morning.
- The Storm Prediction Center has a Marginal Risk of severe weather for all of CEHE early Saturday morning as waves of storms move through the region. A few storms may go severe, and all thunderstorm hazards are possible. Given the early morning hours, hazards associated with storms will be low. Timeframe for severe storms should be with frontal passage around 3-9AM.
- River, stream, and creek flooding will the greatest hazard, along with low-lying areas with a good portion of us receiving 1-2 inches of rain. Isolated spots may receive less, with some spotty areas receiving 2-3+ inches as well. A Marginal to Slight Risk of Excessive Rainfall is outlined for CEHE by the Weather Prediction Center.

Key Messages

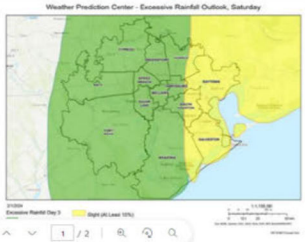
- ✓ Frontal passage will be from 3-9AM and that will be the time when a few thunderstorms can go severe.
- ✓ While all severe thunderstorms hazards are low, localized flash flooding is slightly higher given soil saturations still being high from previous rainfall event.
- ✓ By midday, most of the showers and storms should exit to the east and we'll see some late day sunshine.
- ✓ Rainfall amounts will vary. On average we'll see 1-2 inches of rain. Some will see less, while some spotty areas may receive up to 3 inches of rain.

Threat Level / Parameters	None	Low	Medium	High	Very High	Notes
High Winds (25mph+)						Multiple days: Friday, Sunday and Monday
Thunderstorms						Likely storms around 3-9AM
Flash Flooding						Marginal to Slight Risk of Excessive Rainfall
Frequent Lightning						On occasion with severe storms
Hail 1" or larger						Low to none
Tornadoes						Low to none

In-Depth Forecast Considerations

- ➢ Confidence that storms will move through the CEHE area late Friday and into Saturday is high with forecast model consensus.
- ➢ Early morning storms may go severe, but without a lot of heat, instability will remain on the lower side and so will all the hazards associated with them.
- ➢ While severe storm hazards are low, they are not zero.
- ➢ Gusty winds will follow the system and we'll see gusts over 30 MPH Friday, Sunday and Monday.

Weather Prediction Center - Excessive Rainfall Outlook, Saturday



1 2 3 4

SPC FLOODING RISK

Examples of the Preparedness Report and Weather Forecast

3.2. Emergency Plan Activation

CenterPoint Energy has established Emergency Levels to help ~~support CNP in~~ understand~~ing~~ the complexity of an emergency and possible actions that may need to be implemented at the particular emergency level (Emergency Operations Center (EOC) activations, resource/staffing needs, mutual assistance, etc.).

Table 3.2

Level of Activation	Description
Level 4 -Routine Operations Incident	Normal daily operations; any issues are resolved at the crew level
Level 3 – Elevated Incident Conditions	An incident has occurred, but local/regional resources are capable of handling. The Emergency Operations Center (EOC) is not activated. EP&R staff are notified and available for support.
Level 2 – ~~Severe~~ Emergency Conditions	An emergency has occurred that requires coordination among multiple departments and resources. The EOC is partially or fully activated to support depending on significance of emergency. EP&R staff are notified. Crisis Management Committee (CMC) is notified, but likely not activated
Level 1 – Crisis Conditions	A crisis has occurred, and significant coordination is necessary. Crisis may involve multiple CNP operations/locations. EOC is fully activated. Crisis Management Committee (CMC) is activated

The use of these Emergency Levels promotes a common operating picture and mindset among all responding departments about the severity and urgency of the situation.

This plan's concepts and operations will be implemented in accordance with emergency needs, available resources, and the activation levels.

Components of this plan are activated whenever emergency conditions exist which cause normal operations to not be capable of being performed and immediate action is required to:

- Protect lives,
- Restore operations,
- Coordinate communications,
- Prevent damage to the environment, property, or operational components, and/or
- Temporarily assign CenterPoint Energy staff to perform emergency work.

Activation of any emergency response will include the establishment of an Incident Command ~~System~~Team per the Incident Command System, part of FEMA's National Incident Management System. Depending on the scope and nature of the emergency, there may be some emergency functions that are not activated or may be activated after the initial response has already begun. For an effective response, CenterPoint Energy will only activate the functions that are required but maintains the ability to allow for activation of additional functions if the emergency escalates, to include all functions when appropriate. The Incident Commander/Unified Command will determine what functions need to be activated.

The Incident Commander/Unified Command will determine the activation level appropriate for the emergency. They will notify the appropriate leadership positions based upon the activation procedures, as well as the CMC.

Regardless of the Emergency Level activated, employees must be prepared to respond. Employees should connect with their supervisors and know their roles during an emergency. If necessary and called upon, management will release their employees from their normal responsibilities to assist with an emergency response. Since each event is different and emergencies can change quickly, the procedures and components within CNP's Emergency Plans are designed to be scalable to meet all emergencies, and employees should be prepared to adjust their response, if necessary, to meet changing circumstances.

3.2.1. Trouble Levels

Trouble levels are a reactive decision-making tool for emergency response in CEHE operations. Trouble levels are used to help classify the impact an emergency has had, or may have, on the system. If an emergency is capable of being forecasted, the Emergency Level is designed to provide guidance for what the potential Trouble Level may be and help determine how the Company will respond. CEHE's eight Trouble Levels are used in conjunction with the CNP Emergency Levels.

Level of Activation	Trouble Level	Overview of Typical Electric Impact	Level of Response
Level 4 – Routine Operations Incident	1 - 4	Normal conditions across system.	Regular Operations Duty Team working. Contract crews activated as needed.
Level 3 – Elevated Incident Conditions	5 - 6	Multiple regions affected; requires coordinated response across the service area(s).	Partial • Duty Team responding, as needed; • Contract Crews activated, as needed. Additional Incident Response Team (IRT) Members activated as needed.
Level 2 – Emergency Conditions	7 - 8	Most or all regions affected; requires coordinated response and resource management across the service area(s).	Full • EOC activated upon request or as needed; • Incident Management Team (IMT) activated to CEHE DOC; • Additional IRT Members activated as needed; • Contract Crews activated, as needed; • Logistics activated at ~~Trouble Level 8~~ as needed. Mutual Assistance Foreign Crews activated, as needed.
Level 1 – Crisis Conditions	8+	All regions affected; requires coordinated response and resource management.	Full Plus • EOC activated; • IMT activated to CEHE DOC; • Additional IRT Members activated; • Contract Crews activated; • Logistics Support activated; • Resource Management Support activated. • CMC activated Mutual Assistance Foreign Crews activated.

3.2.2. Operational Alignment Call

Once an emergency condition is forecasted or occurs for CEHE Operations, the CEHE Incident Commander on duty, or the CEHE Directors and Vice Presidents, or their designees, have the authority to initiate an Operational Alignment Call.

The Operational Alignment Calls are designed to help determine the anticipated impact of the emergency condition, the response capabilities and plans, and whether any emergency centers should be activated.

Operational Alignment Calls are designed for all levels of emergencies and specific to CEHE response and restoration operations and do not replace any emergency briefing calls designed for Level 2 or Level 1 Emergencies. When an Operational Alignment Call is initiated, the deciding authority will schedule the call.

3.2.3. No-Notice Operational Emergency Notifications

Emergencies can happen without notice. If the emergency is sudden, the deciding authority will notify the EP&R staff to activate the appropriate emergency centers based on the level of emergency. EP&R staff will then send a "CNP Alert" with activation details including:

- Type of emergency incident, if applicable
- Reporting location (DOC, EOC, and CMC locations as appropriate)
- Operational Alignment Call information, if applicable
- When to report
- Any safety or security instructions

All identified EOC staff and CMC members should have a secondary and tertiary representative in case they are unable to report upon activation.

3.2.4. Pre-Staging/Resource Mobilization

When a threat or hazard dictates, the Incident Commander, or his/her designee, may direct the pre-staging of response crews, personnel, and/or necessary materials and equipment in certain areas to allow for their efficient and safe deployment. Staging areas may also be activated, if necessary.

To assist in the evaluation and decision making ~~of the amount~~ of resources (personnel and equipment) that may be needed based on the impact from the emergency event, CNP uses a damage prediction model for natural hazards such as hurricanes. The ~~prediction damage~~ model provides data of estimated ~~likely projected~~ damage that may occur to the transmission and distribution system ~~that c~~and assists in making determinations for personnel, material, ~~needs~~ and equipment needs to proactively ~~request and pre-stage,~~plan and procure, if necessary.

To help ensure ~~we have~~ the necessary number of resources for forecasted natural hazard emergencies that ~~e~~may~~n~~ have uncertain impacts, a 25% resource buffer ~~will be~~ is applied ~~used~~ to ~~when~~ identify~~ing~~ the quantity of resources needed to efficiently and safely restore the system to normal operations.

3.2.4.1. Personnel/Crew Types

At the onset of an emergency, internal crews will be divided to create ~~as many~~ first responders, ~~as possible~~ as needed, to assess damage and begin restoring electrical service by performing automated and manual field switching, as well as fuse level response. As damage assessments

and initial restoration activities are completed, staffing will be adjusted to levels needed to assist in ~~restoration~~ performing equipment replacement and repair.

Internal Crews

CEHE has an internal cadre of trained crews to be utilized in all facets and phases of an emergency. A count of these resources is continually available via the Situational Awareness dashboard. The proper allocation and management of these resources is pivotal to a successful emergency response.

Contract Crews

CEHE maintains contracts with participating contract companies for additional restoration support. Combined, these "contract crews" will complement CEHE's resources. These resources are activated ~~prior~~before or during emergency response when it is determined external crews are required or will likely be required. The number of necessary contract crews requ~~ested~~ired is determined by the estimated or actual quantity of trouble cases, referral rate and type of equipment damage that is expected or has occurred, including by use of the damage model. ~~of work orders during an event.~~

Mutual Assistance

When there is the potential that the need for additional crews may expand~~s~~ beyond the internal and contract crews already available to CEHE, additional resources may be requested. ~~we may request additional resources.~~

During a Level 2 or Level 1 Emergency, CEHE will coordinate with the regional mutual assistance groups (RMAGs) for ~~any~~ additional available resources. Should other utilities also be in need of resources, the RMAG will utilize the RAMP-UP tool to fairly distribute resources between the requesting parties based on need and contract resources previously acquired. Entries into the RAMP-UP system can be coordinated through CenterPoint's Mutual Assistance Team.

In addition to RAMP-UP, the Mutual Assistance Restoration Coordination (MARC) tool will be utilized. The MARC software may be utilized to manage rosters from off-system resources and electronically deliver work to crews that are not on our internal work-order systems. External crews requested by CEHE may have additional requirements to include some type of mobile technology (*e.g.*, iPad, Smartphone, Toughbook, Laptop, etc.) to send/receive rosters as well as to receive work packets.

3.2.5. Emergency Assessment

In responding to an emergency, CEHE will initiate an Incident Action Plan (IAP) for electric service restoration. This plan establishes the goals and objectives for the restoration of electric service. It may also be necessary to establish service restoration priorities. The establishment of priorities is operationally driven and primarily focused on the restoration of service to as many customers as soon and safely as possible and/or health and public safety services if necessary. Priorities sometimes may need to be modified to accommodate the particular needs of various communities. The EOC will manage priority/objective-setting in a coordinated manner whenever possible.

3.2.6. Damage Assessment

CEHE uses damage modelling to forecast damage in advance of a hurricane, storm, or other severe weather. Once those occur, Damage Assessment begins with the mobilization of crews to identify and assess damage to CEHE electric delivery facilities. This may include making repairs or referring the order to be assigned to the appropriate crew. Typically, this will be conducted by internal first responders. Ppatrol inspectors and unmanned aerial vehicles (UAV) may also be activated to assist in damage assessment. This enables damage to be assessed quickly and allows for internal crews to begin to be redeployed to assist in restoration.

3.2.7. Restoration Strategies

Restoration Strategies ~~sets priorities to optimize service restoration to~~ prioritize~~s~~ the restoration of critical health and human services facilities, public safety facilities, and restoring services to the largest number of ~~most~~ customers as quickly and safely as possible. CEHE first responders will restore service, when possible, during damage assessment; however, for cases requiring restoration work activities, work will be referred to construction crews as the emergency progresses. Contract Crews and Mutual Assistance Crews ~~will~~ may be activated and utilized depending on the severity of the event and at the discretion of the ~~IC~~Incident Commander.

There may be emergencies where certain additional strategies are implemented for service restoration due to the complexity of the event. CEHE leadership will determine the appropriate restoration strategy to most effectively respond to the particular emergency and meet the goals and objectives for electric service restoration. In general, CEHE's first priorities are to restore power to the highest number of customers out of power as quickly as possible and to protect critical health and human service and public safety facilities, such as fire stations, police stations hospitals, warming centers, water treatment facilities, etc. that provide important health and human services and/or public safety service to the community. To meet those priorities, CEHE may deploy a variety of strategies such as cut and clear, order based, etc., and ~~also~~may account for particularly negatively impacted customers and communities, vulnerable populations, particularly prolonged outages, and other unique issues requiring particular attention.

To speed system restoration efforts, damage modeling is utilized to estimate the potential system damage, quantify the number of resources required, and plan for staging and the dispatching of resources based on various restoration strategies.

Restoration activities may be divided into geographical divisions to assist in managing span of control challenges and allowing focus on division restoration. These Division Leads will be responsible for ensuring the execution of the tactics required to meet the operational period objectives created by the Incident Commander.

-Vegetation management and clearing following natural hazard emergencies is an important component to the restoration strategies. CEHE uses a process to accelerate the dispatching of vegetation management crews as soon as it is safely practicable to do so after an emergency event clears its system. Accelerated vegetation management may also be performed prior to an expected emergency event to address "high risk" vegetation concerns, based on the output of the damage modeling.

~~To speed system restoration efforts, damage modeling is also utilized in the initially in onset and planning for staging and the dispatching of resources based on various restoration strategies and potential system impact.~~

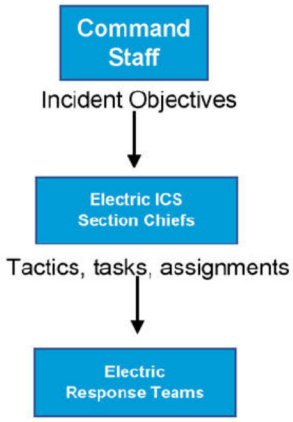
3.2.8. Temporary Emergency Electric Energy Facilities (TEEEF) Strategy

The addition of temporary emergency generation to CEHE's toolkit for Load Shed, EOP Restoration, Mutual Assistance procedures, and other uses cases permitted by statute provides greater ability to supply temporary emergency generation power and bring customers online in targeted areas more quickly while working to restore the grid. This allows for CEHE to allocate crews and resources more efficiently, to restore service more quickly, address particular localized outages, and prioritize service restoration to particular groups of customers. See Annex H for more information.

3.2.9. Develop Objectives

The CEHE response to an emergency of any scope or magnitude is objective-based. The goal of the emergency response is to maintain and stabilize the operational components that support CEHE's critical services. These components are interdependent. Failure in one can cascade across multiple or all of the other components. The Incident Commander will work to establish specific, measurable, achievable, realistic, and time or task-oriented (SMART) objectives, and the CMC will then review, amend, or approve them.

The CEHE ICS Section Chiefs will take the objectives and identify strategies, tactics, tasks, and activities to achieve these objectives. These will be accomplished through the development and issuance of assignments, plans, procedures, and protocols for various emergency functions.



3.3. Incident Management System

CenterPoint Energy has adopted the National Incident Management System (NIMS) Incident Command System (ICS) as its command structure for emergencies. The Director of EP&R is the coordinator for ICS implementation. ICS is an all-hazards incident management tool allowing the response of many different CNP departments and outside mutual assistance to be

coordinated. This structure can be expanded or contracted based upon the size of the incident, maintaining a manageable span of control and following a clear chain of command.

The EP&R department is responsible for ICS implementation during emergency response operations. EP&R will adhere to the principles of NIMS and ICS, including use of common terminology, integrated communications, and the use of pre-designated facilities such as the Distribution Department Operations Center (DDOC), Transmission Department Operations Center (TDOC) and the Emergency Operations Center (EOC). EP&R will also ensure that NIMS and ICS are integrated into all emergency training and exercises.

During emergency response operations, the Senior Vice President of EP&R and the Director of EP&R will coordinate with the responsible utility or department to establish an Incident Commander / Unified Command, as required.

3.3.1. Incident Command

When a single Incident Commander (IC) is used, the IC has full responsibility for incident management. This concept can be used for both simple and/or complex organizational structures for the emergency.

Most emergencies will begin with a single Incident Commander. The first responder from CEHE will become the IC and have command responsibilities until:

- A supervisor relieves them.
- The scale and complexity of the emergency changes where an IC change makes sense
- Personnel shift changes as part of the evolution of the emergency.

3.3.2. Unified Command

For emergencies that involve multiple CNP utilities, multiple jurisdictions, or multiple authorities, CEHE may establish or participate in a Unified Command structure as part of the ICS incident management organization. Unified Command enables utility operations or departments with different responsibilities and authorities to work together under a common set of incident objectives. All work that is carried out under a unified command structure will occur without the organizational responsibility, accountability, or authority being lost.

3.3.3. Crisis Command

If an emergency rises to the level of activating the Crisis Response Plan, Crisis Command will likely be used for incident management. Crisis Command is organized to oversee the management of large incidents or multiple incidents that are each being managed by an ICS organization. Crisis Command will be established at the CNP Emergency Operations Center (EOC) or another appropriate location and provide oversight for the consistent implementation of CNP policies, priorities, constraints, and guidance across incidents and efficient use of critical resources.

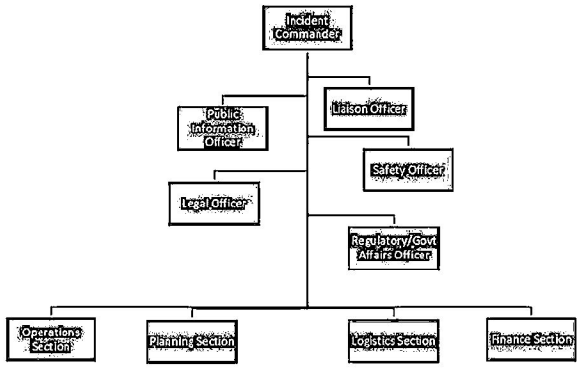
When the emergency rises to the level of the ~~Crisis~~ Corporate Response Plan, the Crisis Management Committee (CMC) will work~~ing~~ out of the Emergency Command Center (ECC), and the Crisis Command Staff will work~~ing~~ out of the CNP Emergency Operations Center (EOC). See the ~~Crisis~~ Corporate Response Plan (CRP) for more information.

3.3.4. Command and General Staff

CenterPoint Energy fills the following positions within the ICS Command and General Staff, depending upon the nature of the emergency and the Emergency Level. These staff positions comprise the Incident Management Team (IMT). The table below refers to the Command and General staff positions for a Level 2 or Level 1 Emergency.

Position	Emergency Roles and Responsibilities
EOC Manager	Responsible for managing and overseeing the Emergency Operations Center.
Incident Commander/ Unified Command	Responsible for the overall management of the incident and guides the incident to resolution as safely, quickly, and completely as possible.
Public Information Officer	Advises the Incident Commander on information dissemination and media relations, obtains information from and provides information to the Plans Section, and obtains information from and provides information to the community and media. Coordinates between the Command/Response Coordination and the Joint Information Center (JIC).
Liaison Officer	Assists the Incident Commander by serving as a point of contact for agency representatives who are helping to support the operation and provides briefings to and answers questions from supporting agencies.
Safety Officer	Advises the Incident Commander on issues regarding incident safety and works with the Operations Section to ensure the safety of field personnel.
Regulatory and Government Affairs Officer	Responsible for providing guidance and discussing regulatory issues impacting the response and coordinates communications with regulatory agencies, public officials, and others.
Legal Officer	Responsible for providing guidance and discussing legal issues impacting the response and administering claims.
Operations Section Chief	Responsible for managing all tactical operations for the emergency.
Planning Section Chief	Responsible for overseeing incident-related data gathering and analysis regarding incident operations and assigned resources, facilitates incident action planning Meetings, and prepares the Incident Action Plan (IAP) for each operational period.
Resource Unit Leader	Responsible for maintaining master list of operational resources assigned to the incident, tracking resource activities, and coordinating with their sections to achieve incident goals and objectives related to resources.
Logistics Section Chief	Oversees the provision of all the incident's support needs, such as ordering resources and providing facilities, transportation, supplies, equipment maintenance and fuel, communications and food and medical services for incident personnel, negotiating leases, maintaining vendor contracts.
Finance Section Chief	Oversees staff responsible for recording personnel time, and tracking and analyzing incident costs and considering cost recovery.

The organizational chart below identifies the typical command and general staff for a CEHE emergency response. Depending on the emergency, the groups, branches, and teams may expand or contract to support the goals and objectives of the emergency.



3.4. Incident Organization

CenterPoint Energy uses multiple operations centers at different emergency levels.

Generally, the Emergency Operations Center (EOC) will not activate for an emergency that can be managed at the Department Operations Center (DOC). DOCs are dedicated to a specific department's incident management and response. When CNP's EOC activates, the DOC communicates operational status, resource requests, and logistical needs to the EOC.

3.4.1. Department Operations Center (DOC)

The CEHE Department Operations Center (DOC) is activated whenever the emergency exceeds the capabilities of a CEHE Service Center's operational capabilities and coordination among multiple Service Centers is needed.

3.4.2. Emergency Operations Center (EOC)

The CenterPoint Energy Emergency Operations Center (EOC) is activated when emergency operation coordination exceeds the capabilities of the Department's DOC. The EOC is used when multi-department support is needed for the emergency. In some cases, the EOC may also reduce the burden on incident command during a single department response by managing some operational aspects such as staging sites, etc. The EOC:

- Collects, shares, and disseminates information.
- Supports resource needs and requests.
- Coordinates plans and determines current and future requirements.
- Supports public communications.
- Liaisons with external partners.
- Supports the policy and legal needs of decision makers.

3.4.3. EOC Activation

The Director of EP&R or his/her designee, the on-duty Incident Commander, or CEHE Leadership may activate the EOC. Upon activation, Command and General staff will report to the Emergency Operations Center (EOC). If the primary location is unsafe or otherwise inaccessible, the staff will assemble at an alternate location.

The EOC will operate on a 24-hour cycle inclusive of two 12--hour operational periods. ~~These~~Each operational period is ~~are~~ responsible for executing the restoration efforts and incident management activities during their operational period and also developing the Incident Action Plan (IAP) for the following operational period.

3.4.3.1. EOC Manager

The EOC Manager is responsible for overseeing the Emergency Operations Center. This includes:

- Activate the EOC when necessary.
- Notify the EOC staff of the emergency and the EOC activation.
- Notify the CMC of the EOC activation.
- Conduct briefings and debriefings.
- Approve and oversee the Incident Action Plans (IAPs).

3.5. Situation Reporting

3.5.1. Incident Action Plans

Incident action planning provides a standardized decision-making approach. The Incident Management Team (IMT) will be established for each event and can use incident action planning to collect, analyze, and disseminate information to create and maintain a common operating picture during the response to an emergency. An incident action plan (IAP) documents incident goals, operational period objectives, and the response strategy defined by incident command during response planning. The IAP contains general tactics to achieve the goals and objectives within the overall strategy, while providing important information on the emergency and response. The IAP also facilitates dissemination of critical information about the status of response resources. As the emergency evolves, IAPs must be regularly revised (at least once per operational period) to maintain consistent, up-to-date guidance across the incident management system. IAPs should be finalized and approved prior to the operational period and ~~they are responsible for~~ ensure~~ing~~ objectives, strategies, and tactics are disseminated to the personnel performing the actions.

An IAP should include:

- Incident goals
- Operational period objectives
- Response strategies
- Response tactics
- Organization list with ICS chart showing primary roles
- Assignment list with specific tasks
- Critical situation updates and assessments
- Resource status updates
- Safety plan

- Communications plan
- Logistics plan
- Emergency map, if applicable
  - In particular, an IAP should **establish estimated times of restoration (ETR) for the entire system** as soon as possible following an emergency incident or major disruption (*e.g.*, within 24 hours of a tropic storm existing our service area) and update ETRs at least daily until restoration is complete.

3.6. Functional Roles and Responsibilities

When the EOC is activated to support a CEHE emergency, CenterPoint Energy relies on Emergency Support Functions (ESFs) to support the core capabilities of response and recovery operations. Not all ESFs are activated during an emergency, and not all of them are activated at the same time. ESFs may or may not be activated or deactivated depending upon the nature of the emergency as well as the response and recovery needs.

Each ESF shall have a primary, secondary, and tertiary representative responsible for the functions of that ESF. The department designated as responsible for the ESF will update the representative contacts on a regular basis in conjunction with the EP&R Department's requirements and within the appropriate management systems.

Emergency Support Function (ESF)	Department Responsible	Responsibilities
ESF #1: Transportation systems and resources	Fleet Services	• Evaluate transportation needs and restore transportation services. • Manage transportation services to support emergency operations.
ESF #2 Communications Systems	Information Technology	• Serve as the lead for the Information Technology (IT)/Communications Unit during EOC activation. • Support communication systems in the EOC and field during an emergency. • Maintain operability of telecommunications and backup emergency communications. • Provide for protection of vital electronic records. • Provide technical assistance in data retrieval and restoration. • Assess the communications infrastructure. Troubleshoot, maintain, and support communication systems.
ESF #3: Critical Infrastructure and key resource restoration	Electric Business	• Pre-identify the critical infrastructure and key resources to support system reliability and service restoration. • Prioritize critical infrastructure. • Pre-identify priority circuits that provide health and human services to community. • Pre-identify critical care customers.

		• Determine resource needs from staffing internal crews, contractors, damage assessors, and mutual assistance as needed. • Assess activation needs for TEEEF and key equipment depending on nature of event (boats, drones, ATVs, etc.).
ESF #4: Information collection, analysis, and dissemination	Emergency Preparedness & Response	• ~~Staff~~ Support the Planning Section at the EOC during an emergency. • Coordinate with stakeholders to develop a common operating picture. • Monitor conditions and collect information relative to the emergency event. • Analyze and share information with appropriate stakeholders
ESF #5: Sheltering	Procurement	• Lead the Hoteling coordination at the EOC during an emergency. • Coordinate with departments to support sheltering operations. • Address the hoteling needs of the operations. • Provide frequent reports to the EOC.
ESF # 6: Resource management	Warehouse and Materials Management	• Provide information and status of resources during response. • Evaluate and fulfill resource requests. • Anticipate impact and assess Situation Reports to identify potential resource needs.
ESF #7: Logistics	Procurement	• Secure equipment, supplies, or services. • Maintain a robust and sustainable logistics support capability that is flexible and adaptable to meet unpredictable demands of all hazards.
ESF #8: Direction, control, and coordination	Emergency Preparedness & Response	• Coordinate efforts of CEHE incident management structure with other departments. • Support short- and long-term planning activities. • Ensure goals and objectives are established, tracked, and accomplished appropriately. • Serve as Planning Section Chief in the EOC during an emergency.
ESF #9: Mutual aid	Electric Business	• Follows guidelines of the EEI Mutual Assistance Agreement. • Coordinates with RMAGs, MARC, etc. • Utilizes Resource Allocation Management Program for Utility Professionals (Ramp-Up) to request/respond to utility resource needs. • Resources responding are from investor-owned utility companies and their native contractors.

		• Non-investor-owned utility contractors may also be acquired.
ESF #10: Emergency Information	Corporate Communications	• Communicate emergency information and updates to customers utilizing the various communications systems and social media outlets. • Disseminate emergency alerts and instructions before and after an emergency event to employees. • Capture actions taken by internal and external stakeholders. • Maintain a credible, effective working relationship with the media, ensuring they have access to information. • Organize press conferences.
ESF #11: Government Affairs	Government Affairs	• Provide accurate, timely, and accessible information to local, state, and federal partners as appropriate. • Review regulatory requests and directives and support compliance. • Establish appropriate regulatory staffing required to support the incident. • Assist with resolving regulatory issues as needed. • Coordinate Government Liaisons with local governments to help ensure coordination and collaboration on issues.
ESF #12: Administration and Finance	Finance	• Provide support for the Finance and Administration Section at the EOC during an emergency. • Develop and share guidance for finance and budget personnel during an emergency.
ESF #13: Alert and Notification	Emergency Preparedness & Response	• Implement the Emergency Operations Plan. • Coordinate and liaise with CMC during response period. • Prepare EOC for activation.
ESF #14: Damage Assessment	Electric Business	• Lead damage assessment teams • Report operational information and observed damage to EOC. • Identify any unmet needs that may require immediate attention. • Determine magnitude and severity of damage to structures and infrastructure. • Identify the areas and populations most in need.
ESF #15: Debris Management	Electric Business	• Employ emergency debris clearance. • Lead debris management teams. • Coordinate with stakeholders for the debris removal and/or disposal process.

ESF #16: Food, water, and commodities distribution	Procurement	• Determine anticipated food and water needs and begin the process of obtaining items.

4. Finance

CenterPoint Energy Incident Management Teams (IMT) and all CEHE responding personnel will follow established financial procedures for requesting, receiving, managing, and applying funds for the delivery of emergency response and logistical needs. When the scope and scale of the emergency extends beyond normal financial operational capabilities, or to obtain a timely administrative and financial approval and response, CNP may enact particular emergency financial procedures. This may include:

- Emergency Work Order creations.
- Increases in financial approval limits for key leaders involved in the emergency response.
- Time sheets and work tracking processes.
- Pre-emergency purchases of critical materials or products for response or mitigation efforts.
- Delegation of purchase approvals to key emergency response leaders.

5. Communications

CenterPoint Energy implements ~~the Joint Information System (JIS)~~extensive communications during emergencies to organize and provide consistent, coordinated, accurate, accessible, and timely information and updates to the public and stakeholders during an emergency.

Emergency communication processes and procedures are outlined in the Emergency Response Comms Playbook. The Emergency Response Comms Playbook serves as a playbook for CenterPoint's communications before, during and after:

- Hurricanes and Other Extreme Weather Events ~~Major Storms~~
- Temporary Service Interruptions mandated by the Electric Reliability Council of Texas (ERCOT)/load shed events due to insufficient power generation to meet high demand.
- Other emergencies and events.

Corporate Communications is responsible for leading the ~~JIS operations~~maintenance and revision of the Emergency Response Comms Playbook.

The Emergency Response Comms Playbook outlines frameworks, timelines, and procedures for:

- **Launching initial communications as early as possible before a potential emergency incident**, such as forecasted severe weather or service interruptions, based on data availability.
- **Providing daily or more frequent updates** to customers, state and local government stakeholders and regulators.

- **Ensuring that the company has representatives in contact with and/or embedded (as requested) in state and local emergency centers** to act as conduits for information.
- **Maintaining a comprehensive web page dedicated to the emergency incident on the CenterPoint website,** when possible, with a prominent top-of-page link from the company's homepage to serve as a comprehensive repository of incident-related communications.
- ~~**Providing**~~**Communicating estimated times of restoration (ETR) for the entire system** as soon as possible following an emergency incident or major disruption, and updating ETRs at least daily until restoration is complete.~~This section outlines key communication operations that take place during an emergency.~~

~~CEHE maintains liaisons with various first responders and emergency management organizations, as well as third-party assistance agencies and public officials throughout its service area and communicates regularly with these groups regarding the status of electrical emergencies. Additionally, the Company provides required notifications to the PUC, ERCOT, the U.S. Department of Energy, NERC, and the Texas Reliability Entity, as appropriate. These identified liaisons are responsible for communicating with their identified constituents and addressing issues.~~

~~In the event of an emergency, the communications team will operate at the Joint Information Center (JIC), a dedicated location to manage the operations of the Joint Information System. The communications team will operate as required until normal schedules can be resumed.~~

~~The communications team will set up a base of operations for communications personnel during the emergency. The following items will be set up and tested:~~

- ~~Phones~~
- ~~Laptop computers with all needed software, applications and network access~~
- ~~Printers~~
- ~~TVs~~
- ~~Access to system outage maps and situational awareness displays via a large screen monitor (dashboard)~~
- ~~CNP Now, the Company's employee communications digital app~~

~~Public Information Office personnel will be advised to:~~

- ~~Pack a bag of personal necessities.~~
- ~~Bring personal cameras (i.e., smart phones) and chargers.~~
- ~~Test individual remote access from outside the office to work computers.~~
- ~~Minnesota and Indiana communications staff are on standby to back up the Houston staff, as necessary.~~

~~The team will be responsible for communicating to CNP employees about the activation of the Company's Crisis Communications Plan, Storm Hotline activation and when/where to report to duty.~~

~~Under the guidance of the Public Information Officer, the team will also have the responsibility for communicating to our external customers and the media before, during, and after an event.~~

- Contact with the local news media will be established as soon as deemed necessary.
- Pre-written media advisories and information to alert the public about the length of potential outages, safety tips and how to prepare will be distributed as appropriate.
- As is available during a particular emergency, information on how to track outages and restoration information on demand (e.g., Outage Tracker Web application, Twitter/X feeds or other methods as may be used) will be distributed to news media outlets, emergency management organizations and other stakeholders and posted on our intranet and Internet sites to show number and locations of outages on our system, if necessary, along with information, on the restoration and prioritization process, FAQs, safety tips, etc.
- CenterPointEnergy.com dark site (Web page to be used in the event main website is unavailable) will be updated and verified ready for use.

Duties during emergency

Notification and Call-out - If the Crisis Communications Plan is implemented, decisions will be made including where and when to report for emergency duty, the nature of the emergency and other pertinent information.

Public Communications Manager will be responsible for public information distribution. The team will produce media advisories, news releases and/or other information for public distribution as required to communicate about CEHE's event. The Public Information Officer or a designated person will approve the information.

Information will be collected from the DOC and EOC. The typical information to be collected at least twice a day or as needed includes the following:

- Assessment of system conditions
- Assessment of safety incidents
- Number of customers without service and locations
- Number of restoration crews and their work locations
- Progress of restoration
- Estimates of when service will be restored
- Number of contract crews/mutual assistance and their work locations
- Hazardous or potentially hazardous conditions
- Crew spokesperson updates
- Other updates as appropriate

News conferences may be held, as necessary, at various locations depending on the event and road conditions.

Calls, Social Media inquiries, Monitoring Media, and Control Rumors

The team will be responsible for receiving, logging, referring, and answering, as appropriate, emails received through CNP's media relations email address, media.relations@centerpointenergy.com. Social media will be monitored, captured and responded to as appropriate according to the company's social response decision tree process, with a focus on responding to inquiries relevant to the greatest number of people. Customers

submitting service requests via social media may be engaged by the Customer Experience Resolution Team (CERT) supported as needed by a scalable team of trained Online Customer Service staff and/or others as appropriate. The team will also be responsible for addressing rumors and misinformation as appropriate.

Under the Social Media Channel Manager, the social media team will be responsible for managing and monitoring the company's social media channels.

Under the direction of the Social Media Channel Manager, before a storm and beginning Day 1 following a storm the team will perform the following:

- Monitor social media
- Determine hashtags to maximize social media audience reach
- Set up automated monitoring reports for stakeholders as needed

Initial content will provide existing general information and templates for system-wide specific information such as:

- Safety messaging – natural gas and electric – for before, during and after the storm
- Process expectations: how we restore power, what and how often we will communicate
- Resources: supplies to have on hand, where to get help, videos (how we restore power, FAQs, generator tips, etc.)
- System-wide outage counts updated on the same schedule as media advisories/news releases/other public communications
- System-wide estimated times of restoration (ETR) by category of storm until more specific ETRs are available
- "One-to-many" responses to inquiries with system-level information until more granular information is available
- Answers to questions from the field and rumor control

As damage assessment takes place, custom content that leverages the strengths of social media will be added to initial pre-written content:

- CNP-produced news from content created for public officials, employees, mutual assistance crews
- Video coverage of news conferences (e.g., Emergency Operations Center or CNP), messages from executives, etc.
- Videos of crews in action, photos of damage submitted by CNP spokespeople, contract photographer(s) and damage assessors as well as drone videos and photos
- Enhanced outage map with ETR by large sub-areas of system and sub-system-level outage information/ restoration estimates in alignment with outage map
- "One-to-many" responses to inquiries with sub-area ETRs
- Information from crew spokesperson lead reports

Following the transition from damage assessment to creation of work packets and localized restoration, Crew Spokesperson Leaders (CSLs) – at least one per Service Center – will collect and document trends/issues/customer questions as well as field activities from crew leads as reported by crew spokespersons. CSLs participate in Service Area Director calls with DOC and emergency management personnel, communicate throughout the day with service center

~~operations and dispatching, and report to their designated social media team member or external communications writer throughout the day as information is available and at the end of each day in a scheduled phone report. These reports form the basis of neighborhood/service center-level messages to be shared with customers via social media as well as crew spokespeople and other stakeholders. Progress Reports include information such as the following for the service center area:~~

- ~~Number and location of crews working in the area~~
- ~~List of key/critical public facilities energized today~~
- ~~Circuit/substation restoration progress (range of % complete) and Estimated Completion Date~~
- ~~Potentially hazardous conditions~~
- ~~Trends, issues, customer questions~~

~~For each service center, a Twitter/X hashtag is established to direct customers to more granular outage and restoration information to be provided by neighborhood-level data sources, with service center updates also posted on Facebook. Maps and zip code charts will familiarize customers with the service center for their area.~~

~~Under the direction of the Social Media Channel Manager, designated employee ambassadors will share approved Company content with their social networks, including closed networks such as Nextdoor.com and closed Facebook groups.~~

~~Employee Communications Manager responsibilities will include creating channels to be used to communicate to employees and will be updated at least twice a day or as needed:~~

- ~~Email~~
- ~~Intranet~~
- ~~Broadcast voice messages~~
- ~~Electric Employee storm line~~
- ~~Natural Gas Employee EOP Line, as appropriate~~
- ~~CNP Now~~
- ~~Special print and electronic news bulletins, as appropriate~~
- ~~Digital signs~~

6. Maintenance and Revisions

Maintenance process for the plan including a method and schedule for evaluation and revision.

6.1. Maintenance and Revisions

The EP&R department is responsible for the maintenance and revision of this plan and annexes.

This plan and its annexes will be reviewed annually and updated and revised as appropriate to incorporate lessons learned from actual emergency situations and exercises or when changes in resources, capabilities, or governance structure occur.

Interim revisions may be made when one of the following occurs:

- A change in CNP site or facility configuration that materially alters the information contained in the plan or materially affects implementation of the Emergency Operations Plan,
- A material change in response resources,
- An incident occurs that requires a review,
- Internal assessments, third party reviews, or experience in drills or actual responses identify significant changes that should be made in the plan,
- New laws, regulations, or internal policies are implemented that affect the contents or the implementation of the plan, and
- Other changes deemed significant.

Plan changes, updates, and revisions are the responsibility of the EP&R department. Suggestions for revisions can be submitted to EP&R through email at emergency@centerpointenergy.com. EP&R will be responsible for distributing any plan changes.

Annexes

Annex A

Extreme Weather Emergencies

Extreme Weather Emergency

Purpose

The purpose of the Extreme Weather Emergency Annex is to provide guidance on preparing for and responding to extreme heat or cold weather situations that could impact CEHE operations.

Scope

There are various situations that could cause an elevated response from CEHE during an extreme weather situation.

- Load Shed as directed by ERCOT
- Widespread outages due to ice-related transformer outages
- Widespread outages due to heat-related transformer outages (also known as a Transformer Tsunami)
- High winds, wind shear
- And others

Decision Making

CEHE Operations will use the decision making and activation processes established in the Emergency Operations Plan for extreme weather emergencies. See *Section 3.2* for more information.

Concept of Operations

Load Shed

CEHE's Real Time Operations (RTO) utilizes and maintains a response plan for Load Shed that is directed and coordinated by ERCOT. The RTO Team will utilize the Load Shed procedures along with the EOP as necessary to support this response.

For additional information regarding the load shed plan, please reference *Annex B*.

~~**Equipment Failure**~~

~~It is the responsibility of the Incident Commander (IC) on duty to monitor the situation and determine if the EOP, or portions of the plan, should be activated.~~

- ~~Upon activation, the Incident Command structure will be based on the roles identified in the EOP. The IC and support team will make determinations on staffing, resources and materials as necessary.~~
- ~~In the event of a significant shortfall of materials, staffing, or other issues, the IC has the discretion to activate any needed Emergency Support Functions (ESFs) of the EOP to provide additional support.~~

Mitigation – Anti-galloping

Since 2015, CEHE has continued system hardening projects to retrofit portions of 69 kV and 138 kV transmission lines with anti-galloping devices to avoid damage from icing conditions.

Proactive Weatherization

CEHE designs its transmission circuits to the then-current edition of the National Electric Safety Code (NESC), which is the industry standard for ice and wind design for coastal and inland areas. The Company's practice for designing all new transmission lines is to utilize Grade B loading requirements. Grade B applies the highest geographically applicable NESC values for wind and ice loading as well as the highest safety overload factors. CEHE also incorporates anti-cascade design features in its transmission lines.

CEHE designs its new substations to conform with the latest version of the NESC wind maps. The Company's practice for new substations and equipment is to utilize 2 wind zones: 140-mph (Coastal) and 120-mph (Non-Coastal), which meets or exceeds the NESC wind load based on the substation's location.

CEHE's equipment specifications and acceptance testing standards include the use of ANSI/IEEE standards, which specify temperature ranges for service conditions covering a wide temperature range. The temperature ranges vary based on type of equipment from -4°F or -22°F to 104°F or 131°F. CEHE equipment specifications specify -22°F for all major substation equipment.

- CEHE installs heaters in substation transformer and breaker control cabinets.
- CEHE's substation control cubicles are climate controlled.
- CEHE utilizes antifreeze for cooling its station service backup generation equipment, and the equipment is oriented in a manner that avoids water and ice buildup on components which could inhibit operation.
- CEHE utilizes station service voltage transformers (SSVTs) in new substation installations, which have been retrofitted to key transmission substations where the station service feed is provided by local distribution providers.
- CEHE installs weep holes in substation buses to avoid water and ice buildup.

Transmission Routine Maintenance

CEHE maintains the integrity of existing transmission structures, wires, and rights-of-ways in a variety of ways, including a five-year cycle transmission line inspection and rehabilitation program that is coordinated with the transmission vegetation management program. Approximately twenty percent of the transmission system is ground inspected each year. Any line component or vegetation conditions identified that will likely cause a failure or a circuit outage within a critically short period of time are mitigated as necessary.

Substation Routine Maintenance

CEHE performs periodic station checks on applicable equipment to verify pressures and levels for Sulfur Hexafluoride (SF6), oil, nitrogen levels, transformer and breaker cabinet heaters, alarms, and supporting circuitry. Station checks are scheduled monthly for 345kV and select 138kV substations. Station checks for the remaining substations are scheduled every 2 months.

CEHE performs additional substation equipment and protection system maintenance according to manufacturer recommendations or in accordance with NERC maintenance interval requirements, generally whichever is more frequent.

Distribution Routine Maintenance

CEHE maintains a distribution wood pole inspection and rehabilitation program based on an average 10-year cycle. Any line component identified that will likely cause a failure or a circuit outage within a critically short period of time is addressed, as necessary.

"As You Go" Inspections

A large ~~amount~~number of CEHE operations personnel are in the field daily. This includes line workers, crew leaders, service consultants, and engineers. As personnel perform their daily business, they are trained to observe the condition of overhead and ground facilities and report any unusual conditions.

Summary of Operations

Preparedness and Response Checklist

The following checklist should be consulted to assist in preparing CEHE personnel and resources during a weather emergency.

Direct Service Center Responsibility

- ☐ Secure personnel roster and update emergency contact information
    - Need employee's name, department, title, location, work number, cell number and emergency contact information (Leaders, make sure that you and all employees have updated information in system. Admin to print out a hard copy.)
- ☐ Discussion with employees about preparing their homes and families. Allow employees time to secure home and prepare for EOP, typically ½ day
    - Remind Employees to stock up on special foods needed and medication.
    - Employees need to fuel their personal vehicles.
- ☐ Identify Storm Riders
- ☐ Review Service Center Roster
- ☐ Review Staging Site Rosters
- ☐ Management Meeting to discuss EOP plans, expectations, and reporting functionality
- ☐ Supervision meets with all personnel to share EOP plans and expectations
- ☐ Pick-up debris
- ☐ Empty the dumpsters
- ☐ Secure the yard – Secure/Clean/Restock the vehicles

- ☐ Secure equipment located outside of the service center and remove potential flying debris hazards
- ☐ Review evacuation plans - Baytown, Galveston, and South Houston.
- ☐ Review Cut & Clear and Back feeding SOP
- ☐ Check Service Center for essential supplies (non-perishables, toiletries, stationary, etc.)
- ☐ Check Satellite phones
- ☐ Check on the availability of spare lap top computers and ensure they have the latest updates
- ☐ Secure Gatorade, water, snacks, etc. for crews
- ☐ Update Cyber Keys – make sure to obtain additional batteries
- ☐ Notify Foreign Crew Coordinators (FCCs) and hold refresher FCC training
- ☐ Ensure sufficient Hand-Held Radios for the FCCs.
- ☐ Establish ramp-down plan

Service Center Coordinate with Support Groups

- ☐ Fuel tanks are filled – coordinate with Fleet
- ☐ Fuel all trucks and stock with material
- ☐ Face trucks toward the dock
- ☐ Check circuit reconfigurations
- ☐ Have a discussion with trouble board about important circuits on work tag at landfall
- ☐ Secure additional food stock in the case of an emergency
- ☐ Have discussion with facilities about boarding windows at the service centers pre-landfall

Service Centers Monitor/ Support Groups Responsibility

- ☐ Test service center generator and make sure back-up generators are topped off
- ☐ Test all generators and pumps - ***Need to do prior to mock drill each year and before every storm***
- ☐ Distribution Control to disable loop sectionalizing schemes (will be done automatically - Cypress, Greenspoint, Humble)
- ☐ Secure caterers at the service centers
- ☐ Secure rental vehicles
- ☐ Secure lodging

- ☐ Check availability/condition of cots – –if storeroom supply is insufficient, request storeroom to get more from Central
- ☐ Shots – In the event of contaminated rising water
- ☐ Service Center Security – Guards stationed at the gates
- ☐ Distribution Project Management to secure the poles that have been dropped off in the field

Transmission Operations Checklist

Manager/Supervisor Responsibility

- ☐ Secure personnel roster and update emergency contact information
  - Need employee's name, department, title, location, work number, cell number and emergency contact information (Leaders, make sure that you and all employees have updated information in system. Admin to print out a hard copy)
- ☐ Discussion with employees about preparing their homes and families. Allow employees time to secure home and prepare for emergency activation, typically ½ day
  - Remind Employees to stock up on special foods needed and medication.
  - Employees need to fuel their personal vehicles
- ☐ Identify Storm Riders as necessary
- ☐ Management Meeting to discuss EOP plans, expectations, and reporting functionality
- ☐ Supervision meets with all personnel to share EOP plans and expectations
- ☐ Secure the yard – Secure/Clean/Restock the vehicles
- ☐ Review evacuation plans for South Houston.
- ☐ Check Satellite phones
- ☐ Check on the availability of spare lap-top computers and ensure they have the latest updates.
- ☐ Secure Gatorade, water, snacks, etc. for crews
- ☐ Update Cyber Keys – make sure to obtain additional batteries.
- ☐ Ensure sufficient Hand-Held Radios
- ☐ Establish ramp-down plan

Ops Supervisor Coordinate with Crews

- ☐ Fuel tanks are filled – coordinate with Fleet
- ☐ Fuel all trucks and stock with material
- ☐ Face trucks toward the dock
- ☐ Assign HDLM trucks to take home to expedite patrols
- ☐ Secure additional food stock in the case of an emergency
- ☐ Have discussion with facilities about boarding windows at the service centers pre-landfall

Manager Monitor/ Support Groups Responsibility

- ☐ Secure caterers at the service centers
- ☐ Secure rental vehicles
- ☐ Secure lodging

- Check availability/condition of cots – if storeroom supply is insufficient, request storeroom to get more from Central
- Shots – In the event of contaminated rising water
- Service Center Security – Guards stationed at the gates

As referenced previously, the Company utilizes four emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of emergency impacting CEHE's service territory. The alert levels may be activated, based on need, during a variety of event types. Please see *Section 3.2* for additional details regarding the Company's response to emergency events.

Annex B

Load Shed

Load Shed

Purpose

Firm Load Shed is the controlled action of shedding firm system load to mitigate operating emergencies due to insufficient generating capacity and to avert cascading outages, voltage collapse, underfrequency issues, system equipment damage, and general grid collapse.

In accordance with NERC Standards TOP-001-5 R1, ERCOT Protocols, and ERCOT Operating Guides, CEHE operates to maintain the Reliability and Integrity of the CEHE Bulk Electric System (BES) during normal and emergency conditions. System Controllers shall have the responsibility and decision-making authority to take the actions needed, up to and including shedding firm load. CEHE is required to implement ERCOT directives to maintain grid reliability by utilizing the available load management programs combined with the automatic and manual firm load shed programs.

Scope

CEHE utilizes the following load reduction and controlled load shedding programs.

- Conservation Voltage Reduction (CVR)
- Summer and Winter Load Management Programs (Commercial and Residential)
- Under Frequency Load Shed (UFLS)
- Under Voltage Load Shed (UVLS)
- Manual Load Shed
- Curtailing all non-essential load within Company facilities
- Appealing through the media that all customers voluntarily reduce load

Decision Making

CEHE Operations will use the decision making and activation processes established in the EOP for emergencies involving load shed. See *Section 3.2* for more information.

Concept of Operations

CVR: CVR is a reduction of power consumption resulting from a reduction of voltage. At the direction of ERCOT, CEHE System Controllers will regulate the output voltage of a power transformer by altering the number of turns in one winding.

Load Management Programs: The Load Management Program is an agreement between the Project Sponsor (a qualifying customer or its sponsoring energy services company) and CenterPoint Energy to curtail electric loads on notice. At the direction of ERCOT, CEHE will notify the Project Sponsors to fulfill their commitment.

UFLS: CEHE's UFLS program is intended to arrest severe frequency declines and to facilitate the operation of the ERCOT interconnection as a single island during severe under-frequency events. The UFLS scheme is an automatic program that when there is a system disturbance and the frequency drops to a pre-selected level, then selected loads are shed.

UVLS: CEHE's UVLS program is intended to arrest severe localized voltage declines. The UVLS scheme is an automatic program that when there is a system disturbance and the voltage drops to a pre-selected level for a pre-determined time, then selected loads are shed.

Manual Load Shed: Manual load shedding is the process of manually removing pre-selected loads from a power system to maintain system integrity.

During an ERCOT declared EEA Level 3, CEHE System Controllers shall manually shed load when directed by ERCOT consistent with timeframes established in the ERCOT Nodal Operating Guides, Section 4 Emergency Operations. CEHE has pre-defined Distribution feeders identified in advance based on various criteria.

CEHE System Controllers shall manually shed load if a condition warrants such action, including but not limited to safety, equipment damage, and regulatory or statutory requirements.

TEEEF. *See* Annex H regarding the Company's Temporary Emergency Electric Energy Facilities, which may be used in load shed events.

Priorities for restoring shed load to service:

When directed by ERCOT to shed load, or if an automatic program is activated, System Controllers shall only restore loads when given the approval to do so by ERCOT. System Controllers may rotate loads to limit the amount of time customers are affected based on the cause of the load shed event.

When an event occurs within the CEHE service territory in which a System Controller sheds load, it is the discretion of CEHE, in coordination with ERCOT, to restore this load.

Critical Load Customers

CEHE maintains a registry of critical load customers, which includes two lists: a list of critical load public safety customers, critical load industrial customers, and critical natural gas facilities and a list of chronic condition residential customers and critical care residential customers. The list of critical load public safety customers, critical load industrial customers, and critical natural gas facilities is managed by the Company's Distribution Accounts group, and the list for chronic condition residential customers and critical care residential customers is managed by the Company's Revenue Protection. The registry of critical load customers is an electronic database located in a secured area within the Company's corporate information technology architecture. The registry is updated as necessary but, at a minimum, annually.

The registry of critical load is updated as customers are approved through the application process. Approved cCritical natural gas facilities are tracked for awareness during load shed and restoration planning. To ensure that the critical load registry is accurate, the Company's personnel interact with various local government and area representatives to review and validate the information.

The critical load registry is used to develop circuit prioritization. When a critical load customer is initially added to the registry, the Company circuit serving that critical load is included in that critical load customer's record. Within the critical load registry, reports can be extracted by circuit, and this information is then utilized in an annual circuit prioritization process. In addition, both the Company's Outage Management System and the Geographic Information System

depict critical load accounts. The Company assists critical load customers by restoring power after an unplanned outage in a systematic way that takes critical loads into account.

Critical Load, Critical Care Residential and Chronic Condition Residential customers are notified when they are approved to be in the Registry of Critical Load Customers. Critical Care Residential and Chronic Condition Residential customers receive notification by mail reminding them to reapply for inclusion in the Registry of Critical Load Customers. Since a load shed event is an emergency order from ERCOT based on a shortfall of electricity being generated, electric utilities, including CEHE, must comply with this orders within short, specific periods of time and do not have the information to be able to notify individual customers if they may lose power, when they may lose power or how long the load shed event may last. However, we will work to keep our customers informed about the situation through local media outlets, social media, and direct communications.

Customer Service conducts formal training on aspects of serving Critical Load Customers for all Customer Service Representatives. Operations and Engineering personnel are trained to refer customers inquiring about acquiring Critical Load, Critical Care Residential, or Chronic Condition Residential customer status to their Retail Electric Provider and the electric portion of the CNP website.

Annex C

Pandemic and Epidemic

Pandemic and Epidemic

Purpose

CNP, like many other businesses and governmental entities, has developed business continuity plans in response to uncontrollable events and natural disasters. One area of increasing concern has been the possible need to conduct operations over ~~a number of~~several weeks or months with a substantially reduced workforce and without the ability to call or rely on outside contractor assistance. This more recent requirement has been based on the realization that a world-wide infectious disease or a pandemic could strike unexpectedly.

CNP, drawing upon governmental and scientific sources, as well as its own experience in responding to natural disasters affecting its service area, has developed detailed plans in preparation of a possible pandemic. The response activities can apply to other similar catastrophes that might cause large scale workforce absenteeism.

Scope

This Pandemic Preparedness Annex addresses CEHE's actions to prepare for, respond to, and recover from a pandemic/outbreak event. This annex may be applied and adapted for any disease that is declared a public health emergency or a pandemic. Due to the significant differences between diseases, this annex is designed to broadly describe the prevention, response, and recovery actions that apply to any disease and address considerations for crisis action plans.

Decision Making

CEHE Operations will use the decision making and activation processes established in the EOP for Pandemics. See *Section 3.2* for more information.

Concept of Operations

CEHE has three main objectives for the Pandemic Preparedness Annex:

1. **Educate** employees on how to be personally prepared for a potential infectious epidemic. Employees should understand their roles and responsibilities in support of the company's response activities and continue to have the opportunity to work in a safe and healthy environment.
2. **Respond** in an appropriate manner to any such threat and attempt to limit the spread of infection, thereby protecting our workforce as much as possible. The annex will identify critical corporate and infrastructure energy delivery functions and devise methodologies for continuing such tasks without undue interruption.
3. **Maintain** essential services to the community and protect the enterprise and safety of our customers through coordinated efforts with various governmental authorities represented in our area and business footprint.

Key elements

Since we live and work in a highly mobile and global economy, an outbreak of a pandemic infectious disease may provide little lead time before operations are affected. CEHE will continue to encourage education of its employees, customers, and other business partners as to how they can prepare for such an epidemic.

Employees

A high priority will be to protect our workforce from the threat of illness by:

- Emphasizing a clean and healthy working environment,
- Coordinating our activities with federal, state and local public health authorities to assist in making available vaccinations and other medications to our employees, and
- Stressing the need for the sick or those potentially exposed/impacted to remain away from the workplace.

An important deterrent against the spread of infectious disease is the isolation of personnel where practical and the use of temporary "physical distancing". Families should stockpile necessary provisions to be self-sufficient within their homes. However, during a pandemic event some sheltering in place may be required for a lengthy period of time, perhaps weeks, since travel and daily shopping may be limited. In addition, schools and day care will likely be closed during community outbreaks, placing an additional need for food, water and other essentials within the home. While ensuring that families are reasonably secure and protected, CEHE employees will also need to focus on supporting the business services upon which our communities heavily rely.

Management

Each manager and supervisor should develop and maintain business process alternatives and business continuity plans with the expectation that a significant portion of their staff may be unavailable or away from usual work locations. For this to be an effective and sustainable plan during an actual infectious outbreak, it will be essential to retain the active participation of all available employees and contract personnel regardless of their normal job duties or work locations.

Crises Management Committee (CMC) Notification

If an incident shows potential for escalation to a pandemic, the CMC will be notified via the notification process outlined in the CRP.

Critical company functions

Unlike the disasters contemplated by some of the company's other business continuity plans, a pandemic typically does not significantly damage or destroy company facilities or directly affect service to customers. Well into the outbreak, it is expected that our electric utility facilities and gas utility facilities will be operating normally. Should such a disaster affect our service territories, it is not about the equipment itself, but rather the skilled workers that operate that equipment and the multitude of support personnel that assist in delivering CEHE's services.

Further, it will not only be important to maintain service to critical institutions such as hospitals, fire and police stations and government health organizations, but to our customers in general

who may have increased needs of critical infrastructure entities. CEHE's Pandemic Preparedness Plan Team, in conjunction with others within our organization, is charged with maintaining a current list of important company functions and ensuring that detailed response plans are in place to continue operations with a reduced workforce. The following work type levels are utilized by this annex to describe those important business, service, and support activities.

Level 1– Business activities that must continue uninterrupted, even in the face of significant workforce absenteeism, in order to maintain appropriate service delivery levels, public safety and corporate financial integrity. Work activities that fall into this critical category may have to be modified so that any absenteeism experienced will not:

- cause disruptions to service according to current emergency plan restoration priorities; or
- impact functions that maintain safety.

Level 2– Business activities that could be delayed for as much as a week without serious business or service consequences. This delay should not:

- jeopardize the supply chain and inventory levels,
- seriously impact company infrastructure, including:
  - voice, data, and information systems
  - inter-company billings
  - transportation systems
  - payroll processing
- place the company in a serious adverse position relative to contracts, laws, or regulations or
- materially impact the financial stability and/or cash flow of the company.

Level 3– Non-critical business functions that could be delayed indefinitely and rescheduled based on available workforce. Personnel associated with activities in this category could be redeployed as needed to perform Level 1 or Level 2 type work.

Strategies

The strategies outlined below are generally based on a pandemic threat like those monitored by the World Health Organization (WHO). WHO uses phased alerts to inform world health authorities and governments of the changing status of influenza pandemic threats as well as other health-related public threats.

Interpandemic Period
Phase 1: No new virus subtypes have been detected in humans. A virus subtype that has caused human infection may be present in animals. If present in animals, the risk of human infection or disease is considered low.

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).

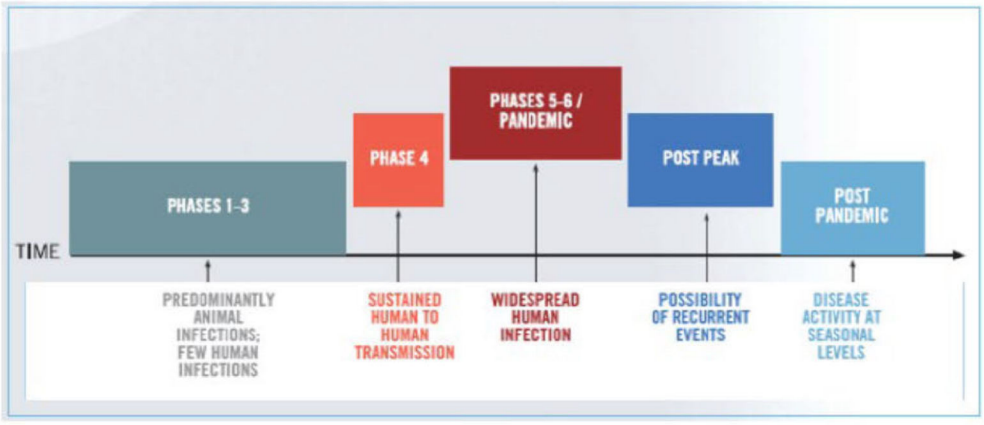
Pandemic Period

Phase 6: Pandemic: New virus is spreading rapidly within human populations around a significant portion of the globe causing serious health concerns. It is worth noting that a pandemic may affect multiple countries, as well as the population within a country, to varying degrees during any of these alert phases as the infectious disease spreads.

Recovery Period

Once the pandemic wave has passed, CEHE will begin recovery of its workforce and develop schedules for completing work that may have been temporarily delayed. The possibility for additional infectious waves must also be considered; therefore, recovery activities should be prioritized as to importance.

Generally, an important activity during the Interpandemic period is the review of key areas, functions and personnel that are vital to a sustained delivery infrastructure and corporate financial integrity. During Pandemic Alert period, CEHE will be focused on employee education, departmental contingency planning, workplace health and safety, and response activity practice. Beginning with the Pandemic Period, CEHE may need to limit employee business travel and discourage other nonessential outside travel. The timing of these and other response activities will be based on information from various authoritative sources such as the Centers for Disease Control (CDC), as well as management's assessment of the nature of specific pandemic threats.



Communication

Accurate, timely and objective communication with all CEHE stakeholders has been identified as a key element to the effectiveness of the Pandemic Preparedness Annex.

Coordination with employees at all levels of the organization, as well as contractors, suppliers, customers, regulatory agencies, news media and the public may prove critical to the level of success we have as a company and community leaders in quickly responding to a pandemic should it occur. Described below is an outline of some of the communication strategies that will be employed in our preparedness efforts.

Communication plan

- Maintain effective communications with all stakeholders
- Coordinate activities with federal, state and local authorities
- Sustain a knowledgeable and confident workforce
- Respond appropriately as threats materialize to protect and reassure our employees

Employees

CEHE's employees are our most valuable assets. The company will endeavor to maintain a healthy and safe work environment and emphasizes the vital role and responsibility of the employee in CEHE's response activities should a highly infectious disease affect our service territory. This requires an understanding of the issues by all involved, communication of our Pandemic Preparedness Annex, discussion with the employees about their roles and responsibilities and practicing response activities as appropriate for each work group to sustain confidence in the effectiveness of the plan.

Therefore, several types of employee communication will be used as appropriate to the audience and situation.

Individual preparation

- Brief email messages about the issues and their national and local importance.
- Listings of useful web sites for self-exploration and education.
- Web access to the Pandemic Preparedness Annex.
- Executive updates at employee meetings and/or through electronic messages to provide current information and respond to questions.
- Emails and posters encouraging seasonal flu vaccination and vaccination to address new viruses for all family members, personal hygiene and social etiquette.
- Education and preparation storyboards for computer-based employee education.
- Special reports and voice mail broadcast messages as necessary.

Departmental Preparation

- Presentation planning material for staff and safety meetings.
- Custom communication for first responder personnel as needed.
- Instructional material for telecommuting and teleconferencing from home.
- Website and Pandemic Hotline with current information and work instructions.

Other stakeholders

CEHE will continue to coordinate its pandemic preparedness plans with its outside stakeholders, including suppliers, contractors, federal, state and local governments and emergency management offices, and regulatory agencies, to clarify roles and responsibilities, verify current contact information and assess and revise response strategies and activities as appropriate.

Educational Resources

This annex is based on a foundation of employee knowledge and understanding of the issues, as well as their dedication and support in executing response activities both at home and work. In that regard, employees should occasionally check for and familiarize themselves with current information on CEHE's intranet website.

The following additional websites also provide excellent background information on pandemics, personal and family preparation and current news articles:

- Centers for Disease Control http://www.cdc.gov/
- World Health Organization http://www.who.int/topics/influenza/en/
- University of Minnesota's Center for Infectious Disease http://www.cidrap.umn.edu/cidrap/content/influenza/panflu/index.html
- American Red Cross www.redcross.org/news/ds/panflu

Annex D

Wildfire

Wildfire

Purpose

The purpose of the Wildfire Annex is to provide actions and strategies to support CEHE's response toward wildfires.

Scope

The scope of this Annex covers actions and strategies to prepare for, mitigate against, respond to, and recover from wildfire incidents directly or potentially impacting CEHE. This Annex depicts CEHE's coordination and communication to support an organized and comprehensive approach to managing wildfires. This Annex will also reference the enterprise Public Safety Power Shutoff (PSPS) procedures.

Decision Making

CEHE Operations will use the decision making and activation processes outlined in Figure 1 for Wildfire emergencies. The Incident Commander (IC) or highest ranking CEHE officer has the authority to initiate a PSPS.

Concept of Operations

Mitigation

Vegetation Management and Equipment inspections

CEHE performs periodic maintenance, including clearing trees and other vegetation and removing dried limbs and other vegetation management debris away from the conductors and equipment on its approximately 1,6050 overhead circuits. Proactive vegetation management takes place on a cyclical basis. For 35kV voltage and some selected 12kV circuits, vegetation management is performed about every three years, while the remaining 12kV circuits are trimmed on an approximate five-year basis. Unplanned tree clearing maintenance may be performed at other times based on locations identified by area operations personnel or as reported by customers.

Additionally, a proactive hazard tree inspection program is performed along the main feeder portions of circuits in areas with tree species that traditionally experience higher mortality rates. Other circuit feeders may be included during times of drought or infestations.

Periodic transmission circuit and Right-of-Way (ROW) tree clearing maintenance is performed on a five-year cycle basis with the facilities' inspections performed the quarter following the vegetation work. CEHE also performs an annual inspection of the whole transmission system to identify hazardous trees or other vegetation issues that need immediate attention.

When weather conditions indicate elevated drought conditions and High Fire Danger Risk as defined by the Texas A&M Forest Service, additional enhanced inspections may be performed in selected areas as warranted by conditions or situations conducive to increased tree mortality or risk exposure. These inspections include the evaluation of vegetation growth within and adjacent to transmission and distribution ROWs and equipment condition inspections.

Additionally, when advance notice of hazardous fire conditions is issued by the local Fire Marshal and the condition could involve transmission ROWs and facilities, mowers are

dispatched to reduce brush within the ROWs. In addition, herbicide contractors apply fire retardants to the base of the company's towers and structures to mitigate or reduce potential fire damage.

Disabling of Automatic Reclosing

When weather conditions indicate extreme drought conditions and Very High Fire Danger Risk as defined by Texas A&M Forest Service along with Red Flag warnings issued by the National Weather Service, work tags are issued for all affected circuits located within the area rated with a Very High Fire Danger rating. These work tags result in the disabling of automatic reclosers to limit repeat operations of a distribution feeder and reducing the likelihood of a power line fault as source of fire ignition. Once red flag conditions expire, work tags are then removed and automatic reclosing is enabled. Table 1 provides an action item checklist.

Public Safety Power Shutoff

To help mitigate the risk of wildfire ignition by company-owned assets, CEHE has developed a Public Safety Power Shutoff (PSPS) program. The objective of the PSPS program is to keep communities safe during wildfire-related weather conditions by proactively de-energizing CEHE facilities in areas that meet certain thresholds. PSPS threshold conditions are defined by several metrics, including, but not limited to: Wind Speed; Relative Humidity; Fuel Models; and asset data.

PSPS must be considered if the following conditions are met:

- A Red Flag warning declared by the National Weather Service.
- Relative humidity levels below 30%.
- Forecasted sustained winds above 19 mph and wind gusts in excess of 45 mph, depending on location and site-specific conditions, such as temperature, terrain and local climate.
- U. S. Drought Monitor status above (D2) Severe Drought.
- Wildland Fire Potential Index (WFPI) above 80.

PSPS may be considered even if not all of the above conditions are met.

The checklists in Table 1 and Table 2 outline the steps taken toward a PSPS initiation.

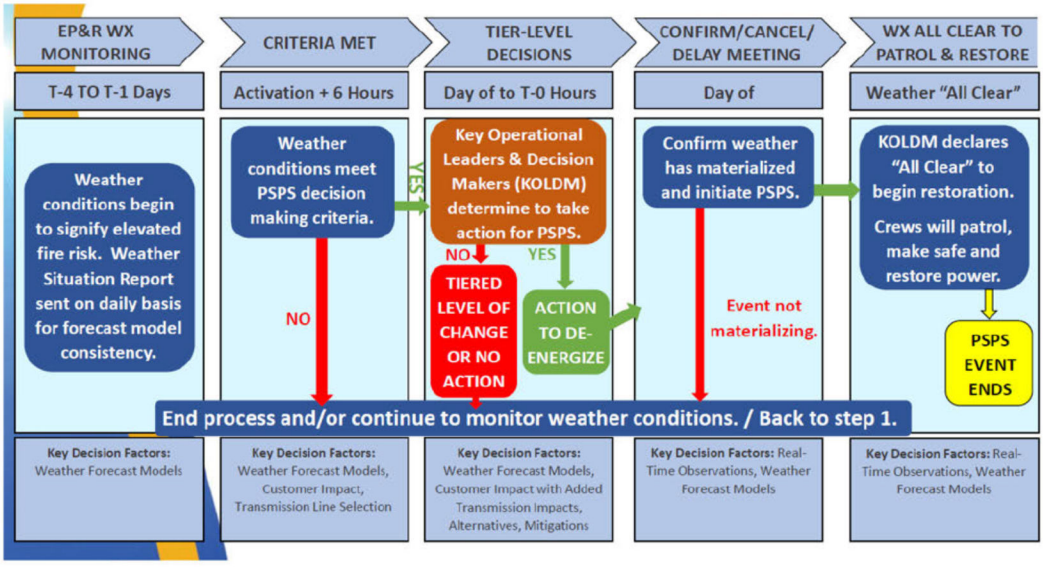
Monitoring and Response

EP&R is responsible for monitoring ~~for~~ wildfire activity and notifying CEHE leadership when conditions begin to signify the potential for an elevated fire risk.

Once weather conditions meet an elevated fire risk, EP&R will begin sending situational awareness information via the Weather Monitoring Report to CEHE and CNP leadership.

This approach enables leadership to evaluate and determine the type of response needed. The response is scalable from the mitigation actions outlined above to a PSPS. Below is the decision-making matrix for a PSPS.

Figure 1. PSPS Activation Decision Tree



Coordination

Before, during and after a PSPS event, internal and external stakeholders will be engaged to allow for coordination, communication and notifications, as appropriate.

Communications Objective

The objective of PSPS is to help keep customers safe by temporarily shutting off power in identified high-risk service areas during dangerous weather conditions and to prevent CEHE's electric system from becoming a potential source of ignition.

The primary objectives of this communications plan are: 1) collect information about the event and the progress being made to return the situation to normal conditions; and 2) communicate this information in a timely and accurate manner to customers, employees, management, governmental officials, and other key stakeholders through several tools and channels.

Messaging of campaign

- Primary Messaging – Public Safety Power Shutoff is a tool to help protect our communities during high wildfire risk conditions.
- Secondary Messaging – Weather and other factors influence PSPS decisions and may change where and for how long customers are affected. CEHE provides tools and resources for insight into the factors that could trigger a PSPS event, as well as for learning about what the company is doing to prevent wildfires.

Stakeholders

- Customers (residential, business, industry) (note that due to the competitive market construct in Texas, CEHE does not necessarily have complete or updated customer contact information for all impacted customers (*i.e.*, if the Retail Electric Providers do not provide that information to CEHE and the customers have not signed up for Power Alert Service); CEHE will communicate to customers using the information it has at the time)
- Retail Electric Providers
- First responders (police, fire, etc.)
- Regulators
- Government Officials
- Investors/Board of Directors
- Employees
- Media
- Community Advocates (NGOs, Environmental, etc.)

CEHE Wildfire Communications

CEHE's wildfire communications plan is driven by a set of strategies and tactics that engage and inform stakeholders before, during and after a wildfire. This is consistent with CEHE's longstanding approach to its severe weather and hurricane-related communications.

The foundation of CEHE's advance planning is ongoing communications via traditional and social media and the company's website, as well as the tools and channels used to engage and inform the company's nearly 9,000 employees. Communication themes would include preventing the development of wildfires; being aware of the status of wildfires and wildfire risks in various area; the importance of heeding to the advice of emergency officials regarding wildfire risks; preparing an emergency plan and kit in the event of a wildfire; emphasizing the importance of a plan for customers who may have life-threatening medical conditions and difficulties in evacuating; and signing up for emergency notification systems and alerts. Importantly, this phase of ongoing communications would also include information and engagement to stakeholders about PSPS (e.g., what it is, why is it used, etc.)

During a wildfire event and a potential evacuation, CEHE will turn its focus to proactive communications and outreach to stakeholders about the situation and its impact on customer safety, operations, support for first responders and emergency personnel, the effects on customers' service, and support for community relief and recovery. In addition to the tools and channels highlighted above, the company will leverage more sources and resources to inform and engage the public, including a cadence of scheduled news conferences, participating in media briefings with elected officials, regulators and first responders, and utilizing customer outreach channels such as Power Alert Service, outbound phone campaigns and emails, each as appropriate to the particular situation. CEHE communicators would also be positioned in all appropriate offices of emergency management and response command centers to coordinate communications and messaging. In the event that CEHE implements PSPS, CEHE will provide communications about that, as well (e.g., what it is, why it used, areas impacted, expected duration, etc.).

After the fire has been safely contained, CEHE would focus on continuing support for first responders and emergency personnel, while increasing the amount and frequency of communications to stakeholders related to restoring electric operations back to normal as safely

as possible. During this phase, CEHE would continue many of the communication and outreach efforts above, including media briefings with elected officials, regulators and first responders. At the same time, CEHE would utilize additional strategies, such as deploying its community outreach and engagement vehicle into impacted communities to address questions and concerns, as well as supporting recovery efforts with employee volunteers and donated supplies.

Customer Service

Communicate with our customer service teams the communications timeline so we can be prepared for potential increase in call volume and/or social responses and have a common message across all fronts.

- Utilize IVR messaging to communicate key messages and be able to answer questions before getting through to an agent.
- Create an internal education program for all agents to make sure they are aware of key messages.
- Pre-approved social care messages or Save replies for our social care team to use as a base message ~~to work from~~. This helps~~ing~~ ensure~~s~~ what they say will align with our other communications.

Restoration

When PSPS conditions have passed, the IC will give approval to begin patrolling affected infrastructure. Re-energization timelines and plans are then formulated based on patrol findings. The PSPS program considers risk of all overhead electric assets in both Transmission and Distribution across the entire service territory, with primary focus on those that pass through high-fire risk areas.

Tiered Level of Action / PSPS Activation

The following checklists are for a tiered approach leading up to a Public Safety Power Shutoff (PSPS), if necessary related to wildfire dangers.

Table 1. PSPS Tiered Action Checklist

	Operations	Task	Assigned to	Date Completed
Enter Drought / High Fire Danger Risk				
☐	Transmission / Distribution	Begin evaluating heightened/targeted vegetation management, increased maintenance and inspections.		
Extreme Drought / Red Flag				
☐	Distribution	Issue work tags for ~~all~~ affected circuits in area based on substation		
☐	Distribution	Bypass ~~all hydraulic~~ reclosers		
☐	Transmission	Heightened/targeted inspections		
☐	Transmission / Distribution	Analyze potential switching scenarios		
Activate Public Safety Power Shutoff (PSPS)				
☐	Transmission / Distribution	Review additional criteria to determine heightened risk factors and proactively de-energize, based on leadership decision.		

Active Fire Situation Actions

Table 2. Active Fire Situation Action Checklist

	Operations	Task	Assigned to	Date Completed
Reported Fire				
☐	Transmission / Distribution	Dispatch crews to affected areas		
Verified Fire				
☐	Transmission / Distribution	Coordinate response with Regulatory and Government Relations		
☐	Transmission / Distribution	Crews remain onsite to coordinate emergency responders' requests with appropriate control group		
☐	Transmission / Distribution	Control group determines risk to public/equipment is great enough or close enough to warrant de-energizing		
☐	Transmission / Distribution	Equipment showing signs of being affected by active fire (operations)		
☐	Transmission / Distribution	Develop switching plans for affected lines		
Activate PSPS				
☐	Transmission / Distribution	De-energize based on onsite command personnel		
☐	Transmission / Distribution	Execute switching plans for affected areas		

Recovery Operations

CEHE is committed to timely, well-coordinated restoration and recovery activities; and while each incident has unique facts and circumstances, CEHE's post-incident restoration approach empowers teams to rebuild and recover from a disaster safely, efficiently, effectively, and consistently. Community support and rebuild activities will be determined based on CEHE's analysis of the wildfire impact.

Table 3. Restoration Checklist

	Operations	Task	Assigned to	Date Completed
No Fire, No PSPS, Circuit Lock Out				
☐	Transmission / Distribution	Fully inspect line / circuit prior to re-energizing		
No Fire, PSPS activated proactively				
☐	Transmission / Distribution	Follow standard re-energization protocols		
☐	Transmission / Distribution	Inspect any line / circuit and their right of ways prior to re-energizing		
Active Fire, PSPS activated				
☐	Transmission / Distribution	Inspect affected equipment to determine if any repairs are necessary		
☐	Transmission / Distribution	Make repairs / clean identified equipment		
☐	Transmission / Distribution	Evaluate and address any vegetation removal needs		
☐	Transmission / Distribution	Re-energize		
☐	Transmission / Distribution	Evaluate / inspect similar areas based on cause of fire		

Annex E

Hurricane

Hurricane

Purpose

This annex provides a framework for the emergency activation for both a system-wide and partial system hurricane response. Hurricane events that may cause disruption to the area's electric service are varied and unpredictable as to severity and portion of the system affected.

To activate the plan, clear communication must be provided to all personnel involved in the planning, response and recovery phases supporting the restoration of electric service.

CEHE leadership, or authorized designees, shall follow the activation and response procedures for hurricanes based on the established emergency activation levels established in the EOP. See *Section 3.2* for more information.

Scope

This annex is for hurricane response and operations for CEHE.

Decision Making

CEHE Operations will use the decision making and activation processes established in the Emergency Operations Plan for Hurricane emergencies. See *Section 3.2* for more information.

CEHE uses a hurricane damage model based on forecasted impact to aid in decision making for external resource needs and potential impact to its ~~the~~ infrastructure.

Concept of Operations

Pre-Storm Preparation

Hurricane Drill

To promote familiarity with the Plan, a general hurricane drill exercise takes place annually. When possible, this exercise coincides with the State Hurricane exercises to provide increased realism.

EOP Storm Roster

The Employee Storm Roster (ESR) is a web-based application that has been developed in house in SAP to help:

- Manage emergency assignments for Company personnel
- Manage and track mutual assistance and contract personnel
- Manage lodging facilities required during a storm event

A process is in place to manage the assignment of personnel as employees are hired, transferred or leave the Company. Employees are encouraged to log into ESR at any time to update and review their emergency-related information as needed. Employees can access ESR by clicking on the "Employee Storm Roster" button on the Company's internal website.

Hurricane Vacation Policy

During Hurricane Season (June 1st through November 30th), when a Level 1 Emergency event is declared, no vacation requests will be approved for Operations staff in CEHE and Houston Gas who serve in Storm Rider and First Responder roles, including critical support functions. Furthermore, vacations already scheduled during the restoration period may be cancelled by management, and no new vacation requests will be authorized.

If a non-operations employee has a planned vacation, but an emergency event is declared prior to the start of that vacation, the employee is expected to talk to his or her emergency leader and direct supervisor. The emergency leader and the employee's direct supervisor have the discretion to allow the employee to take the vacation as planned or deny the time off based on the criticality of his or her emergency role.

If an employee is already on vacation and out of town at the time the Company declares a Level 1 Emergency event, the employee is not expected to immediately return to fill his/her emergency role. Upon returning from vacation the employee is expected to immediately report for emergency duty in the designated role. If the vacationing employee is in town, he or she is expected to return to work immediately to fulfill his or her emergency assignment, and any unused vacation may be rescheduled after the Company returns to normal operations.

If the employee is denied the time away from work and suffers financial loss directly associated with the vacation, such as airline tickets, hotel/condo rental, tour or cruise expenses, he or she shall submit a request for reimbursement to the Company's designated Human Resource Manager, within 10 days after being relieved of emergency duties. The request will be reviewed by management and a decision made within 30 days after the final day of the emergency event.

Employee Responsibilities

If the Company has an emergency activation because of a threat to the continuation of electric service to our customers, employees may be called upon to change job assignments prior to and/or during service restoration. There will be a plan for employees to be released for final emergency preparation prior to an emergency event and lodging planned for "First Responders" with established criteria will be communicated by local management.

Business continuity during an emergency is critical. All employees, whether in their normal job or an emergency assignment, are essential to successful service restoration. The Company values the role each employee plays in serving the needs of our community. Employees are expected to:

- Understand their roles and responsibilities.
- Understand that the primary reporting relationship during the emergency is to the assigned emergency chain of command. Daily assignments during the emergency will be determined by the emergency leader and employees may be asked to take on different assignments as needs change during the service restoration process.
- Participate in the annual emergency exercise, training, and other planning activities as required.
- Make the necessary personal pre-storm preparations to be ready and available to perform the emergency assignment.
- Establish storm plans with their families in advance to ensure employees are prepared to report as directed and to fully execute their assignments during the emergency.

- Maintain a hard copy of important phone numbers, including emergency operations contacts, immediate supervisor, CNP Storm Mailbox (which provides general information during the emergency) and the HR Hotline (which provides employee assistance).
- Be aware that employees in "Day 1" assignments will not be allowed to leave the greater Houston area once an emergency response is activated for a hurricane (72 hours or less until storm landfall).
- Make their management aware of any special needs that may impact their ability to report to duty for the emergency assignments, in advance of the emergency activation.
- Understand that employees are ultimately responsible for their own personal safety and that of their families and take appropriate actions to ensure a safe and timely execution of their roles and responsibilities in the emergency.
- Maintain current contact information in Employee Service Roster (ESR) and ensure their emergency leader and immediate supervisor have the most current information.
- Notify immediate supervisor and emergency leader throughout the year and during emergency assignment, if necessary, of any change in personal needs or responsibilities that may affect their ability to fulfill their emergency assignment. Examples could include: change in residence, phone numbers, or fitness for duty.
- Establish and maintain contact with immediate supervisor and emergency leader in the event of an emergency activation and throughout the active period.
- Recognize emergency assignments will require working extended hours with shifts ranging from 10 to 16 hours per day, seven days a week. Some assignments require long periods of exposure to all weather conditions, walking several miles a day, standing for hours, or taking vehicles off road.
- Recognize that failure to report to duty as scheduled or failure to fully execute the emergency assignment may subject employees to disciplinary action, up to and including termination of employment.

INITIAL STORM ACTIVATION

Basis of activation

The Company will use the activation process established in the Emergency Operations Plan for hurricane response. See *Section 3.2* for more information.

Regardless of the Emergency level declared, employees must be prepared to respond. Employees should connect with their supervisor and know their emergency role if any level of an emergency is activated. If necessary and called upon, management will release their employees from their normal responsibilities to assist in the emergency response. Since emergency events can change quickly, employees should be prepared to escalate response when necessary. Employees will be contacted by their emergency leader and provided with instructions on where to report. For those who do not currently have a role, the Incident Command team will make assignments after determining where assistance is most needed.

Evacuation and Re-Entry Procedures

In the event of a storm, the Galveston, South Houston, Brazoria and Baytown Service Centers evacuate in conjunction with activation of the evacuation plans of Harris, Brazoria and Galveston Counties. The Galveston Service Center evacuates to the South Houston Service Center, and the Baytown Service Center evacuates to the Humble Service Center. All CNP

personnel that live in evacuation zones and that also have Day 1 or Day 2 emergency assignments will be offered lodging by the Company, so that they can be readily available for duty immediately after a storm. The Company has worked with local emergency officials and the State of Texas Phased Re-entry Plan to obtain written permissions and to facilitate/expedite the movement of restoration resources into evacuated areas for the purpose of restoring power.

-Toll Road Procedures

A key route utilized to access portions of the Company's service area is the Harris County Toll Road system. The following procedures have been put in place to address usage:

The Security Branch Director will contact the Harris County Toll Road Authority (HCTRA) to obtain approval from Harris County Commissioners Court for a specific start and end time that restoration vehicles can utilize the toll roads "toll" free. Providing license plate information is imperative to this process.

In the event of a storm:

- Fleet will send a list of the license plate information for any rental vehicles to Corporate Security as soon as possible.
- Fleet will send a list of the license plate information for Houston-area fleet vehicles and trailers.
- Service Area Managers will provide a list of the license plate information for any emergency responders needing access to the toll roads and submit it to the Security Branch.
- Check-in Support at the staging sites will gather CNP personnel license plate information and submit it to Corporate Security.
- During check-in of mutual assistance crews at staging sites:
- Check-in Support will verify any license plate information provided on the rosters and attach CNP decals near the back license plate (such as on the bumper below license plate or on the tailgate above license plate) on each non-CNP vehicle.
- If license plate information is not provided, Check-in Support will record license plate numbers and the state issued for mutual assistance vehicles and trailers.
- Site administrators will send these lists to the Security Branch via fax or email.
- The Security branch will send the license plate information to HCTRA for entry into their system to automate the "No Fine" process.
- Any violation notices issued during the time frame approved by Commissioner's Court should be sent to Corporate Security via fax or email within five days of the invoice date stated on the notice. Corporate Security will then send the notice to HCTRA for dismissal.

Activation Phase Descriptions

The following table describes points for which CEHE has designated specific storm preparation activity. This table describes the parameters required to determine when each of these points has been or will be achieved. These phases are based on ~~w~~When ~~StormGeo~~ the company identifies a location as "Positive" for a hurricane risk. A notification of this risk will be made by adding a notice atop the TropicsWatch web page and communicating through the monitoring and alert processes established in the EOP.

Phase	Description
1 - Hurricane risk indicator is positive	**Weather Monitoring Report distributed by EP&R** Damage model is developed to determine impact potential and scope of damage to assist with resource needs and acquisition timeframes.
2 - The worst case scenario for 39 mph winds reaching this location is < 120 hours and the probability of 58 mph winds impacting this location is > 8%	**Communication to employees** The Public Information Officer (PIO) sends out company-wide communications to employees to tell them to prepare home and family for a storm, know their emergency assignment, etc. The PIO also keeps employees clearly informed of developing storm conditions. **Functional managers verify and report emergency readiness** Make an early ID of shortfalls and take corrective actions as necessary (roster, supplies, personnel, facilities, ice machines, telecommunications, generators, etc.). **Branch director's leaders initiate communication with emergency-assigned employees** Keep emergency assigned employees clearly informed of developing storm conditions and notify them to begin preparations for manning their emergency assignments. Confirm information for emergency team members. Damage model updated based on any forecast changes
3 - The worst case scenario for 39 mph winds reaching this location is < 96 hours and the probability of 58 mph winds impacting this location is > 15%	**EP&R implements storm updates using email and text messaging systems** EP&R commences tracking of storm and periodically communicates position of storm to CNP personnel using the email and text messaging systems. The purpose of this action is to keep CNP personnel updated on direction/intensity of storm. Damage model updated based on any forecast changes
4 - The worst case scenario for 39 mph winds reaching this location is < 72 hours and the probability of 58 mph winds impacting this location is > 20%	**Emergency Level is determined, if applicable.** Activate the Emergency Operations Center (EOC) Prior to activation CNP performs the following on a routine basis: • Ensure all systems and equipment at the EOC are functioning properly • Obtain supplies as needed; set up rooms as planned

Phase	Description
	◦ Set up computers, telephones, Satellite TV access ◦ Test communications ◦ Ensure that the EOC phone number rings at that location. **Based on damage model resource need calculations, The Resource Acquisition group contacts Regional Mutual Assistance Groups (RMAG's) as needed to set up mutual assistance conference calls.** CEHE is a member of the S.E.E., the Midwest, and the Texas RMAG's. Contact these groups as needed to initiate Mutual Assistance Conference Calls. **Logistics alerts staging site owners** Staging site managers make preliminary contact with the staging site owners to notify them of our possible intent to activate our contracts with them. **Logistics section makes lodging arrangements** This action is taken in preparation to accommodate CEHE personnel that are storm riders and first responders that must evacuate according to the Harris County Office of Emergency Management, Galveston and Brazoria counties. These activities continue as more zip codes are evacuated. The Lead Hotel Coordinator should book hotel space based as CNP head count determined. **PIO activates the Joint Information Center (JIC)/activate storm hotline** **Finance submits a request for cash to Treasury** **Logistics section secures food beginning ~~48 hours after the landfall~~when safe to do so.** Operations section secures enough food to feed personnel at all emergency operating sites until the caterers have had a chance to arrive and set up. **Operations evacuates service centers in storm surge areas** Operations will conduct Galveston, South Houston, and Baytown Service Center evacuations in conjunction with evacuation plans for Harris and Galveston counties. Baytown Service Center will evacuate to Humble Service Center.

Phase	Description
	Galveston Service Center will evacuate to ~~South Houston Service Center~~a safe location. **Logistics tops off CNP fuel tanks and secure additional fuel and fuel tanks** Logistics coordinates fuel deliveries to top off underground fuel storage tanks and facility backup generator fuel tanks. They also secure temporary fuel tanks and fuel products for service centers, offsite parking and staging sites. **Communications Unit executes cell relay/DCE extensions to maximum days** **JIC sends communications to Texas market regarding possibility of interruptions regarding meter data** **Operations assesses the operability of production IG devices** **Communications Unit considers securing satellite telephone rentals** Communications Unit will evaluate the need of rental satellite telephones for the staging site supervisors. **Communications Unit considers securing portable voice radio rentals** Communications Unit will evaluate the need for rental of portable voice radios to supplement CNP's normal inventory.
5 - The worst case scenario for 39 mph winds reaching this location is < 66 hours and the probability of 58 mph winds impacting this location is > 25%	**EP&R established Briefing call cadence and initiates calls. These calls will continue through the remainder of the phases.** **Logistics alerts material and logistics suppliers** The Logistics sections provide these suppliers with advance notice to begin making their preparations to supply CEHE with storm restoration materials. They alert suppliers of the coming need for tents, trash, cars, food, laundry, etc. They also alert materials suppliers for poles, transformers, wire, insulators, hardware etc. **Logistics begins relocation of storm stock**

Phase	Description
	The Logistics section delivers the remaining emergency material and bedding to service centers in advance of evacuations. **Logistics analyzes emergency inventory levels** In preparation for the Special Material Release presentation to the section chiefs, the Logistics section will prepare to make preliminary recommendation for purchase quantities based on current inventory levels and storm strength projections. Logistics will continually monitor and evaluate material requirement needs for the Special Material Release as the storm approaches in preparation for the final Special Material Release recommendation at 6 hours prior to landfall. **Based on damage model resource need calculations, Resource Acquisition participates in the RMAG Conference Call** The Resource Acquisition group participates in a conference call for each RMAG that calls were set up with. The purpose of these calls is to determine the number of first wave line and tree trimming resources that are available from these RMAG's. Mutual Assistance utilities can provide line crews, damage assessors, material handlers, and staging site management teams, along with various other personnel.
6 - The worst case scenario for 39 mph winds reaching this location is < 60 hours and the probability of 58 mph winds impacting this location is > 25%	**Conduct operations conference call** Branch directors, SADs, and service center operations conduct conference call to determine preparation progress. **Section chiefs assess special material release** Purchasing presents results of assessment to section chiefs and recommends Special Material Release quantities, values, and timing. **Section chiefs assess preparation** Section chiefs update command staff on preparation progress.
7 - The worst case scenario for 39 mph winds reaching this location is < 54 hours and the probability of 58 mph winds impacting this location is > 25%	~~**Activate the Emergency Operations Center (EOC)**~~ ~~Prior to activation CNP performs the following on a routine basis:~~ ~~• Ensure all systems and equipment at the EOC are functioning properly~~ ~~• Obtain supplies as needed; set up rooms as planned~~ ~~• Set up computers, telephones, Satellite TV access~~

Phase	Description
	~~Test communications~~ ~~Ensure that the EOC phone number rings at that location.~~ **The Public Information Officer issues employee communication regarding employee evacuation of storm surge area.** **Resource Acquisition group participates in RMAG Conference Call #2** The purpose of this call is to further refine the available resource numbers. **Test radio communications at EOCs and DOCs** Telecom visits each operations center and tests its radio for operational performance.
8 - The worst case scenario for 39 mph winds reaching this location is < 48 hours and the probability of 58 mph winds impacting this location is > 30%	**Logistics updates logistics and material suppliers** The Logistics section provides these suppliers with updated information to assist them in their preparations to supply CEHE storm requirements. **Logistics updates staging site owners** Staging site managers make update calls to staging site owners. They verify the availability of facilities previously agreed upon. **Resource Unit pre-positions local tree and line contractors** The Resource Unit allocates all local contractor resources to the service centers in accordance with the plan, to enable contractors to provide immediate response for priority service work. **Fleet Services branch secures rental vehicles** The Fleet Services group within the Fleet Services branch secures rental vehicles to meet emergency storm needs. Based on severity of storm, Fleet will contact potential users of rental vehicles to determine pre- and post-storm needs and to make arrangements to obtain needed vehicles.
9 - The forecasted time of arrival for 39mph winds for this location is < 36 hours and the probability of 58	**Conduct operations conference call** Distribution Operations branch managers, SADs, and service center operations conduct a conference call to determine progress of preparation.

Phase	Description
mph wind impacting this location is > 50%	**Logistics section activates logistics (suppliers, caterers, etc.)** At the direction of Operations, the Logistics section engages logistics suppliers to execute CEHE emergency logistics needs. **Logistics prepares for employee refueling (if necessary)** The Fleet Services group within the Logistics section sets up employees for access to the automated fueling system. Distribute instructions and recording forms in case of fuel system by-pass and temporary fuel tanks. **The PIO communicates with employees regarding emergency show up time** **Operations activates staging sites as required** Operations begins activating staging sites. They continue to update staging site owners if we will use or not use their facility. **Section chiefs assess Special Material Release** Purchasing presents updated recommendations for the Special Material Release based on evolving storm and material availability data.
10 - The forecasted time of arrival for 39 mph winds for this location is < 30 hours and the probability of 58 mph winds impacting this location is > 60%	Emergency Operations Center conducts briefing call Potential topics to cover: • actual or expected storm category • storm condition • emergency level • type of event • damage projection • time of impact • duration of event • emergency timeline status • plan for recovery • progress of preparedness • communications Operations sends select crews and staff home The Operations section releases crews to prepare their homes for storm. They rotate crews, sending half the first 4 hours and the second half the next 4 hours.

Phase	Description
11 - The forecasted time of arrival of 39 mph winds for this location is < 24 hours and the probability of 58 mph winds impacting this location is > 60%	**Operations restricts Galveston, Brazoria and/or Baytown access** Once Harris, Brazoria and Galveston Counties have been evacuated and restrictions put in place by government entities, CEHE service area management representing the service areas in the perspective counties identifies and follows the process for re-entering restricted areas. **Resource Acquisition participates in the RMAG Resource Division Conference Call** The call will be necessary if more than one utility is impacted by the Storm event. The impacted utilities will divide the available resources based on the expected outage counts and amount of damage. Resource Acquisition initiates efforts to secure additional resources outside of S.E.E., Texas and Midwest RMAGs This effort should be initiated if additional resources are still required after exhausting the available resources of the three RMAG's we are members of. The Resource Acquisition group arranges additional conference calls with RMAG's that are more distant from our area but could still provide resources if necessary.
12 - The forecasted time of arrival of 39 mph winds for this location is < 18 hours	**Operations suspends normal operations** The Operations section notifies day crews to start when safe, then begin work the next day, working from ~~5~~6 am to ~~9~~10 pm. **Operations puts night crews and critical operations personnel in place** Operations rolls trouble shooters and third-shift employees, with a support employee, to the night shift (~~5~~6 pm to ~~9~~10 am) to ride out the storm and continue to work that shift throughout the restoration. **Emergency Operations Center conducts briefing call**
13 - The forecasted time of arrival of 39 mph winds for this location is < 6 hours	**Section chiefs assess Special Material Release and approve placement of order** The Supply Chain group presents final recommendations for the Special Material Release based on evolving storm and material availability data. **Supply Chain notifies vendors of Special Material Release**

Phase	Description
	The Supply Chain group places the Special Material Release approved by section chiefs.
14 - Sustained winds fall below 39 mph	**Operations branch directors conduct operations conference call** The Operations branch directors, SAD's, and service center operations conduct a conference call to determine the impact too their facility, equipment and ability to operate. They also report any initial damage assessment. Activate helicopters and Unmanned Aerial Vehicles (UAVs) The Operations Section Chief communicates with Transmission, Substations, and Distribution regarding the need for helicopters and the number needed by each group. Establish landing sites, number of passengers flying, and estimated duration (number of days/hours). Activated when wind is on our shore. **Resource Acquisition participates in RMAG Conference Call #3** Resource Acquisition updates the Resource Request from previous conference calls. They also determine assigned resources and request additional resources outside of S.E.E. if needed. **Update the employee storm hotline** PIO updates information and instructions on the employee storm hotline. Resource Acquisition continues to maintain contact with responding resources and keep them updated as they travel to our territory. **Operations sets up staging sites** The Staging Site Managers within Operations report on the progress of staging site setup to the Operations Section Chief. Operations Section Chief will provide updates to other Section Chiefs as needed. **Security director activates security and traffic control** The director of Security, in the Logistics sections, works with local authorities to provide access for CEHE personnel conducting restoration activities to storm-damaged areas.

Phase	Description
	The director also provides security and traffic control for service centers and staging sites. EOC conducts briefing call This is the first scheduled briefing update after landfall. The call may cover updated versions of the topics mentioned previously and should include goal and objective setting and issues. **Logistics** Based on the latest resource count, the Hotel Coordinator will begin contacting hotels and reserving rooms for incoming mutual assistance and contract crews. These activities will continue through the duration of the incident.

Operations Centers

CNP will use the Emergency Operations Center (EOC) and Department Operations Centers (DOCs) to coordinate the response and operations for a hurricane. See *Section 3.4* for more information.

Incident Command Structure

Based on the emergency level for the hurricane response, CEHE will use the incident command structures outlined in this EOP and the CNP ~~Crisis~~ Corporate Response Plan.

The EOC and DOCs will follow the activation processes established in the EOP.

Distribution Department Operations Center

The Director of Distribution Operations, or their designee, will be responsible for establishing a Distribution Department Operations Center (DOC) in the Greenspoint Service Center, 2nd Floor. The Operations Branch Director will staff and assign personnel as appropriate to the Distribution DOC to ensure:

- Accurate and comprehensive assessment and evaluation of system conditions
- Initiation of corrective measures
- Effective organization of restoration activities
- Efficient prioritization of all resources
- Written summaries regarding available information will be prepared and provided to the Incident Commander, command staff, and EOC in accordance with the ICS Planning Process.

To facilitate tracking system status and restoration progress, information will be maintained on a master system map in the Distribution Department Operations Center (DOC). Personnel to maintain this map will be provided according to the staffing list. Contingent on availability of the supporting systems, Situational Awareness will be used to track restoration progress and prioritization of restoration.

~~Official reports shall be available by approximately 9:00 am daily.~~ This schedule allows for releasing the most accurate information. The status of restoration assessment and progress shall be communicated to the EOC via the scheduled periodic briefing calls. Staffing requirements will be based on 16-hour shifts with adjustments as deemed necessary by the Incident Commander. Access to the DOCs shall be limited to assigned duty employees, interface personnel, and appropriate Company officers.

Underground Department Operations Center

The Major Underground Director, or their designee, will be responsible for establishing a Department Operations Center (DOC) at the Harrisburg Service Center. The Major Underground Manager will staff and assign personnel as appropriate to the Harrisburg Service Center ~~in order~~ to assure accurate and comprehensive assessment and evaluation of system conditions, initiation of corrective measures, effective organization of restoration activities, and efficient prioritization of all resources. The Major Underground Department Operations Center (DOC) reports ~~up~~ through Operations Section Chief.

Transmission and Substation Department Operations Center

The Transmission / Substation Branch Director, or their designee, will be responsible for establishing the Transmission and Substation Department Operations Center (DOC) at EC/DC. Personnel will be assigned as necessary to ensure:

- Accurate and comprehensive assessment and evaluation of system conditions
- Initiation of corrective measures
- Effective organization of restoration activities
- Efficient prioritization of all resources

Status of restoration assessment and progress shall be communicated to Operations Section Chief per the update schedule as determined by the Incident Commander. Staffing requirements will be based on 16-hour shifts as deemed appropriate by the Incident Commander and with adjustments as conditions warrant. Access to these evaluation centers shall be limited to assigned duty employees, interface personnel, and appropriate Company officers and staff.

Summary of Operations

Evacuation and Re-Entry Procedures for Facilities Located in Hurricane Evacuation Zones

While Brazoria, Fort Bend, Galveston, South Houston, Baytown, Harrisburg and Baytown are the facilities in Hurricane Evacuation Zones, our plan is to have all facilities with evacuation and re-entry procedures to follow.

Evacuation Procedures

Galveston, as necessary:

- ☐ Evacuate ~~all~~ equipment – partner with logistics on best place to relocate
- ☐ Evacuate ~~all~~ fleet
- ☐ Evacuate ~~all~~ storm-rider personnel

South Houston, Baytown, Brazoria, as necessary:

- ☐ Evacuate ~~all~~ fleet
- ☐ Evacuate ~~all~~ storm-rider personnel

Bellaire, Fort Bend, Sugar Land, Spring Branch, Harrisburg, Humble, Greenspoint, Cypress, Katy:

- ☐ Evacuate ~~all~~ storm-rider personnel
- ☐ ** Maintain ~~very~~ minimum staffing – possibly perform emergency switching immediately following storm. Will likely require union volunteers or management with previous line skill experience.
- ☐ Equipment remaining in yards should be secured.
- ☐ Consider relocating transformers and critical equipment inside of warehouse or on elevated dock area.
- ☐ Consider installation of anchors installed adjacent to pole racks to enable poles to be strapped down. Initial recommendation would be ~~Galveston,~~ Brazoria, Baytown, and South Houston.
- ☐ Fleet could be relocated to staging site locations, i.e. Pasadena Fairgrounds, Fort Bend Fairgrounds, Sam Houston Horse Track, etc.
- ☐ Remind employees that storm-riders will be relocated to evacuation sites. Due to space limitations, storm-riders should make prior arrangements for family members and have plans to safely evacuate their family members elsewhere.
- ☐ Discussing ability to utilize neighboring utilities staging sites as evacuation site for storm-rider employees and limited fleet.
- ☐ Look into mobilization of sleeping trailers for storm-riders.
- ☐ Catering can be arranged for these staging site/evacuation sites.
- ☐ Should utilize buses, if possible, to transport storm-riders to evacuation sites.
- ☐ Focus should be on employee evacuation and safety.
- ☐ ~~Very small contingency of employees should remain, and focus should be on avoiding a system-wide blackout.~~
- ☐ ~~May want to consider a handful of line skills to remain for emergency switching, immediately following the event. Would likely have to consider union volunteers or possibly management with line skill experience.~~
- ☐ Send out EOP preparation checklist to Dist. Ops. Leadership

Re-Entry Procedures

All Locations:

In the State of Texas, municipal and county chief elected officials (mayors and county judges) are responsible for deciding the specifics of the reentry process. As a result, reentry processes may differ among counties or municipalities. Because of this, the state reentry strategy is designed to operate in tandem with varied local response and recovery efforts and to support associated requirements.

Each local jurisdiction has the authority to determine who receives credentials and how that process occurs. The purpose of credentialing is to ensure and validate the identity and attributes of an individual. An effective credentialing solution enables a local incident commander to request, receive and use personnel from outside their jurisdiction.

Credentialing should take place before an incident occurs. Some incidents, however, may require the activation of a just-in-time process for validating, issuing, and tracking credentials.

The US Department of Homeland Security (DHS) has developed a National Incident Management System (NIMS) Guideline for the Credentialing of Personnel. The processes laid out by DHS are voluntary and do not override the authority of local officials or states to manage response operations.

Once Incident Command has determined it is safe for CEHE personnel to return for assessment, crews will follow re-entry procedures determined by local and state officials.

- ☐ Communicate to all internal and external workforce the importance of safe work practices.
    - Be aware of high-water areas and monitor current weather conditions. Be prepared for severe weather.
- ☐ All centers continually assess and monitor high water areas for mobility and restoration purposes.
- ☐ Review operational status of all service centers and facilities.
- ☐ All centers with possible accessibility issues develop mobility plans.
- ☐ Continue to evaluate possible resource requirements.
- ☐ Develop and execute an external communications plan. (Public Affairs, Regulatory, Government Affairs)
- ☐ Review any outstanding fleet resource needs.

Review individual service center plans to restore service to facilities vital to public safety, health, and welfare.

Annex F

Cyber Security

Cyber Security

Purpose

~~Cyber incidents are not unlike operational incidents. When a user or operation identifies or believes a cyber incident is occurring or has occurred, their first responsibility is to contact CNP Cyber Security to initiate actions, procedures, and/or practices to stabilize any impact to business or operational systems which may jeopardize employee or public safety, result in consequences to employee or customer information, or interrupt of business continuity. It is incumbent upon the user to contact Cyber Security to initiate the procedures outlined in the Cyber Incident Response Plan (CIRP) immediately upon the initial incident detection.~~

~~Cyber security programs at CNP are enforced through Information Technology (IT) Security policies and procedures that identify:~~

- ~~Authorized and unauthorized actions within CNP on technology systems.~~
- ~~Assigned organizational responsibilities.~~
- ~~Acceptable levels of risk.~~

~~When CNP's IT Security policies and procedures are violated, a cyber incident may occur. To detect, respond, and manage violations, incident response policies and procedures should be used to minimize risk and facilitate recovery from a violation.~~

~~The purpose of CNP's CIRP is to provide a structured, systematic incident response process for all company information technology systems, including third party services and/or systems to: identify, escalate, and respond to Information Security incidents. The CIRP is intended to:~~

- ~~Assist CNP and third-party personnel to recover from different levels of Information Security Incidents quickly and efficiently.~~
- ~~Define the business, IT, and/or control systems incident process and step-by-step guidelines creating a consistent, repeatable incident response process.~~
- ~~Mitigate and/or minimize the loss or theft of information or disruption of critical infrastructure.~~
- ~~Provide consistent documentation of activities related to actions taken during incidents.~~
- ~~Synthesize knowledge and experience into preventative security measures.~~
- ~~Reduce overall exposure for CNP.~~
- ~~Decrease the total time to reach incident resolution by initiating an effective and efficient response to Information Security Incidents.~~

~~Provide for business understanding and participation in the IT incident response and incident management processes in order to establish a more effective strategy and response to future Information Security Incidents.~~Cybersecurity incidents will be managed through the framework of the EOP and supplemented with specific procedures and processes outlined in the Cybersecurity Incident Response Plan (CIRP). The CIRP is intended to assist CNP and its affiliates and subsidiaries in promptly responding to, resolving, and recovering from Cybersecurity incidents. The CIRP has been updated in 2024 through its maintenance and revision process by the Cybersecurity department within Legal.

Scope

~~The standards and guidelines contained in this document define CNP's CIRP that applies to:~~

- The fundamental information actions and tasks needed for IT personnel to provide incident response services to CNP's control system and/or related IT systems.
- All CNP business groups, divisions and subsidiaries and their employees, contractors, vendors and business partners.
- All computer systems, computing devices, control systems, and networks connected to the CNP network.

Incident notifications that are automated (i.e., – system notification) or manual (i.e., – employee notification, external party notification).The CIRP applies to every Cybersecurity Incident, which is defined as any actual or reasonably suspected:

- Unauthorized or accidental access to or acquisition, use, disclosure, alteration, loss, destruction, or other comprisecompromise of Company information.
- Unauthorized occurrence, or a series of related unauthorized occurrences, on or conducted through a system owned or used by CNP that jeopardizes or is reasonably likely to jeopardize the confidentiality, integrity, or availability of the system or any information residinge therein, or
- Other cybersecurity-related or computer fraud event identified as a Cybersecurity Incident in the CIRP Glossary.

The CIRP is intended to supplement related CNP response and business continuity processes. The CIRP controls to the extentd there is a conflict between the CIRP and other such materials related to cybersecurity incidents.

Decision Making

CEHE Operations will use the decision making and activation processes established in the Crisis Response Plan for emergencies involving cyber security. See the Crisis Response Plan for more information.

Concept of Operations

To efficiently and effectively respond to an Information Security Incident, the groups responsible for investigating, containing, remediating and returning the systems back to normal are outlined in the CIRP with their roles and responsibilities during an Information Security Incident.

Unavailability of critical personnel can arise at any time, because Paid Time Off ("PTO"), illness, accidents and unforeseen events are inevitable. To avoid a single point of failure, backup arrangements for personnel should be made in advance. Members of the CIRT should not be allowed to have the same day off. The lack of critical personnel may arise during the time just before and after business hours. During that time most of the critical team members may be commuting to or from home. They may be reachable but may have a difficult time performing specific actions. This can be avoided by having team members "stagger" their business hours.

For these reasons, each Business Unit must prepare and maintain a list of primary and secondary contacts and provide it to the Corporate Cyber Security Department on a regular basis.

The CenterPoint Energy Incident Response Framework consists of the five (5) steps to handle Information Security Incidents in a consistent manner: Detect, Notify, Analyze, Recover, and Follow-Up.

~~Should the cyber security emergency impact operation technology (OT), CEHE Operations will activate all or portions of this CIRP to support continuance of operations during the emergency.~~

Annex G

Physical Security

Physical Security

Purpose

This annex addresses company facilities and assets including office buildings, service centers, vehicles, equipment, materials, and supplies, as well as company employees and contractors on company property or while performing work on behalf of CEHE.

For CEHE facilities or assets subject to federal security requirements such as North American Electric Reliability Corporation (NERC), Transportation Security Administration (TSA) Pipeline Security Guidelines, Department of Homeland Security (DHS) 6 CFR 27 Chemical Facility Anti-Terrorism Standards (CFATS) or 49 CFR 193 LNG, the applicable federal rules / requirements are primary, and the CNP security guidelines and requirements are supplementary.

This document is considered supplementary and secondary to the CNP Physical Security Policy and Corporate Security Emergency Plan.

Scope

The security branch is responsible for all security and law enforcement related services during an emergency event. The organization is made up of a combination of CNP employees and select contractors.

Corporate Security is responsible for:

- Maintaining a safe and secure work environment for all personnel and vehicles involved in recovery of an emergency.
- Securing assets during incident coordination and deployment of contract security officers and off- duty police officers
- Acting as a liaison with law enforcement or other governmental agencies
- Coordinating police escorts of crews and materials
- Prompt handling of all incidents of a security nature
- Traffic control for AM and PM crew truck movements at staging sites
- Coordination of toll road procedures with local toll road authorities
- On-going maintenance, monitoring, and responses to electronic security systems

Personnel should refer to the STORM hotline for updates and reporting duties during an emergency event.

Concept of Operations

Physical Security Policy

Corporate Security has published a Physical Security Policy which is a controlling and overarching policy above this manual. This manual is secondary and supplementary to the Physical Security Policy available in the Policies section of CNP Today.

Security Operations Center (SOC)

The Security Operations Center (SOC) is a 24/7 operation center, which provides dispatch and security support to all CNP properties, employees, contractors, and other stakeholders. As the primary point of contact for security issues and incidents that occur at CNP properties, SOC Operators play a key role in both operational security and facility safety. Using various technical

security systems and monitoring software, the SOC is responsible for the detection, triage, and alerting of routine and critical security incidents. The SOC assists with the escalation and incident management of critical security incidents.

Security Incident Reporting

The immediate reporting of security incidents to the Corporate Security Department is required and is very important to help ensure a prompt Company response and the implementation of effective mitigation solutions.

WHAT TO REPORT

- Crimes - thefts, threats, assaults, etc.
- Security related incidents - fires, cut fences, trespassers, card reader doors propped open, improper security procedures being followed, etc.
- Suspicious and unusual incidents - persons photographing Company facilities, unknown packages left unattended, aircraft low fly-overs of critical facilities, unusual calls to obtain Company information, etc.

COST OF LOSS

Business units should report an estimated cost of loss when the incident is originally reported. The actual cost of loss will be reported after all costs of loss and repair have been completed and calculated.

Cost of loss is defined as the total cost to replace the loss of an asset. As an example, cost of loss for the theft of equipment would include the replacement cost, plus the estimated cost of labor involved in obtaining the replacement equipment. In the event of a copper theft the cost of loss would be the cost of replacement material, employee labor, and any contractor costs. Cost of loss can be a determining factor in deciding the appropriate security mitigation actions.

HOW TO REPORT

In case of a fire or life-threatening emergency, immediately call 911, and then notify your supervisor and Corporate Security (713-207-5500).

CORPORATE SECURITY RESPONSE TO INCIDENTS

Corporate Security will notify local law enforcement agencies for response to all suspected or actual criminal incidents. As appropriate, Corporate Security will notify state or federal security or law enforcement agencies (FBI, DHS, State Police, etc.)

Protection of People and Assets

Suspicious Persons and Activities

- All employees should be aware of their work surroundings and report any and all suspicious persons or activities they observe.
- Suspicious persons or activities could include:
  - Unknown persons or vehicles in the work area.
  - Transients.
  - An employee in an area they do not belong.
  - Persons loitering near company property or work areas.

- Some indicators of suspicious surveillance of the company:
  - Demeanor of the individuals (Do they avoid eye contact?)
  - Do they appear interested in something that is not there or that would not normally hold long periods of interest?
  - Do they appear to be taking measurements with their feet/stride, vehicle (driving a pattern), or using a range finder?
  - Attempts to gain sensitive information about security measures or personnel, entry points, peak days, and hours of operation, and access controls such as alarms or locks.
  - Observations of security procedures or staffing positions.
  - Discreet or unusually suspicious use of cameras or video recorders, sketching or note taking, particularly of or about sensitive areas or restricted access points.
  - Unusual or suspicious interest in speaking with building maintenance personnel.
  - Observations of or questions about facility security measures, to include barriers, restricted areas, cameras, and intrusion detection systems.
  - Observations or questions about facility air conditioning, heating, or ventilation systems.
  - Attempted or unauthorized access to rooftops or other potentially sensitive areas.
- What may constitute suspicious activity to one person may not be suspicious to another person. A good gauge for distinguishing suspicious persons or activities is if your intuition or instinct tells you something is wrong, it probably is wrong. By recognizing and reporting suspicious activity we may prevent a loss or crime from occurring and help to better ensure the safety of employees and company assets.
  - Should you observe suspicious persons or activities report it immediately to:
    - Your supervisor.
    - Corporate Security.
  - Call 911 immediately if a crime is occurring or the situation appears dangerous or threatening.

Sabotage

Sabotage is the deliberate destruction of property, equipment, controls, or communication with the intent of causing:

- Interruptions to critical operations
- System Failure
- Disruption of the bulk electric system or gas distribution system

Events caused by theft and vandalism are not considered sabotage.

- The key to protecting CNP facilities from sabotage is to be conscious of activities in or around our facilities. Early detection and recognition of potential and actual sabotage events are critical. Sabotage may be the work of terrorists, hostile individuals, or disgruntled employees. Sabotage events can be cyber, physical, and/or operational and may include events like:
  - Terrorist threats or attacks.
  - Discovery of explosives.
  - Extensive damage to our electrical, gas distribution, gathering, and distribution facilities and equipment.

  - Suspicious packages in/around our facilities and equipment.
  - Apparent forced entry.
  - Intelligence gathering attempts; unauthorized people requesting information about items such as operations, software, and telecommunications, etc.
  - Unauthorized physical surveillance, including photography.
  - Other suspicious events.
- Employees who observe an act, event, unusual conduct, unusual inquiry, any questionable or suspicious activity involving company physical and/or cyber facilities, assets, or personnel should consider such activity a potential threat.
- Employees should avoid "confirmation bias" to explain their observations – in other words, developing a "good reason" why something may have occurred. Some examples are, "That person is just really curious so is asking lots of questions" OR "There's damage to this equipment but it was probably just kids messing around."
- It is the responsibility of all company employees to report suspicious activities by notifying their supervisor and the Corporate Security Department as soon as possible. If an immediate risk of damage, injury, or sabotage is present, employees should call 911 immediately.

Trespassers

- Trespassers are not permitted on company property.
- If trespassers are found upon company property, take the following actions.
  - If your facility has a security officer, notify the security officer immediately so the person(s) can be removed.
  - If no security officer is at your facility, then notify your supervisor or building management.
  - If you feel safe doing so, advise the loiterer or trespasser that you represent the company property and that they need to leave immediately. If the person fails to leave, call the police.
  - When the police arrive they will ask you if you want to issue a trespass warning. You will have to tell the police officer that the person is not welcome, is trespassing and that you want them to leave. If the person persists and refuses to leave after being given this notice then they will be subject to arrest by the police for trespassing.

Physical Security Support to an emergency event for Non-Security Related Activations

Security Staffing and Responsibilities

Security is responsible for providing services to help maintain a safe and secure work environment for personnel and assets during recovery from an event.

Security support during an event includes:

- Providing support for the staging site security coordinators
- Coordination and deployment of contract guards and off-duty police officers
- Overseeing security at staging sites
  - Acting as a liaison with law enforcement, other governmental agencies, and private industrial security departments
  - Coordinating police escorts for crews and materials

- Contract at least two off duty officers per staging site for escorts
  - If and when local police can provide escorts, these officers may be released
  - Prompt handling of all incidents of a security nature
- Retain one police officer overnight to provide armed security for each staging site
- Coordination of toll road procedures with Harris County Toll Road Authority
- The maintenance, monitoring of, and response to applicable electronic security systems
- Traffic control for AM and PM crew truck movements
  - Providing guidance and direction for personnel brought in by contract to assist with the staging site traffic flow and parking for foreign crews
  - Contract an off-duty police officer for in/out traffic control at staging site street entrance and exit gates, during active hours of work

Field Staffing:

- Security Coordinator Lead
- Senior Security Coordinators
- Security Coordinators

At the Tower:

- Manager
- Security Technical Coordinator Lead
- Security Billing Contractor Coordinators
- Security Technical Coordinators

Inputs

- Security Coordinators (Lead and Seniors)
  - Which staging sites will be opened (from Operations section chief)
  - Traffic control needs at staging sites (from Staging Site manager)
  - Which restricted roads CNP needs access to (from Operations)
  - Any security incidents that occur (from Staging Site manager or Operations)
  - Which crews and materials will need police escorts (from Operations and Supply Chain)
  - Which assets will need protection (from Operations and Staging Site manager)
- Security Billing Coordinators
  - State and plate numbers of foreign and mutual assistance crews (from Resource Unit)

Tasks

- Security Coordinators
  - Coordinating with local authorities to ensure CNP personnel access to storm damaged areas
  - Coordinating and deploying contract guards and off-duty police officers
  - Acting as a liaison with law enforcement or other governmental agencies
  - Coordinating police escorts of crews and materials
  - Handling promptly all incidents of a security nature

    - Coordinating traffic control for morning and evening crew truck movements at staging sites
- Security Technical Coordinators
    - Coordinating toll road procedures with Harris County Toll Road Authority
    - Maintaining, monitoring, and responding to information from electronic security systems
- Security Billing Contractor Coordinators
    - Keep track of time logs for contract security resources
    - Ensuring that CNP processes payments for security contract resources in a timely manner

Outputs

- Information on which foreign and mutual assistance vehicles will need access to toll roads (to HCTRA)
- Payments to contract security personnel

Process Timeline

During emergency:

- Coordinate with local authorities for CNP personnel entry to damaged areas
- Provide security and traffic control at staging sites
- Provide security for service centers
- Advise management of security issues

Responsibilities

Maintain Security for emergency Staging Site(s)

- Security personnel schedules
- Security personnel assignments

Coordinate with Corporate Security for Law Enforcement Support

- Crew escorts
- Customer threats
- Denied access
- Oversized loads
- Police checkpoints
- Traffic control

Security Incidents

- Document all incidents
- Report to Corporate Security and Staging Site Management

Documentation

- Keep track of all security related schedules
- Keep track of all security requests
- Keep a sign-in log at the main security tent for all security related personnel

Reporting for Duty

- Have your CNP issued ID
- Report to EOP Leader until dismissed from duty or emergency activation
- Report to assigned staging site on day 1 of activation
    - Staging site working hours (5am to 9pm) – 7 days a week
    - Things you will need
        - Staging site layout
        - Contacts list
        - Area map
    - Prepare for staging site conditions
        - Wear appropriate shoes and clothing for the environment
        - Wear safety vests, traffic whistles, etc.
        - Bring medications, laptop, air card (if appliable), smart phone, phone charger, etc.
        - Refueling to be determined on availability
        - Meals and fluids to be consumed as time permits (eat and drink when you can, sit when you can)
        - Track hours worked, work related mileage, and personal cell phone charges
        - Be alert (SITUATIONAL AWARENESS)
            - Irate Customers or personnel (NOT allowed access to staging sites or SCs)
            - Crew/Site Personnel altercations
            - Report to onsite management or call 911 if necessary

Annex H

Emergency generation/Long Lead Time Facilities

Emergency Generation/Long Lead Time Facilities

Purpose

As a result of amendments to PURA in the 2021 Texas Regular Legislative session and in the 2023 Texas Regular Legislative session, Transmission and Distribution ~~Us~~Utilities, like CEHE, may lease and operate facilities that provide temporary emergency electric energy to aid in restoring power to the utility's distribution customers during "a significant power outage" in which the independent system operator has ordered the utility to shed load or the utility's distribution facilities are not being fully served by the bulk power system under normal operation.

Scope

This Annex covers actions and strategies to prepare for, mitigate against, respond to, and recover from "a widespread power outage" that directly impacts customers of CEHE that requires emergency generation during the restoration operations.

In accordance with applicable statutes, CEHE has entered into a lease agreement with an emergency generation provider to secure emergency temporary back-up generation capacity, with the lease agreement ending on June 30, 2029. This lease agreement also extended the lease term for certain temporary emergency generation units that CEHE had previously leased under a short-term lease agreement. CEHE has leased up to approximately 500 MW of temporary emergency generation units, with actual output depending on ambient and other operating conditions. CEHE has the following temporary emergency generation units to deploy, if necessary: [1]

- Up to fifteen (15) ~~mobile~~ temporary turbine generator sets capable of providing approximately 30 MW or more of power each depending on ambient temperature and other operating conditions.
- Up to five (5) ~~mobile~~ temporary turbine generator sets capable of providing approximately 5 MW or more of power each depending on ambient temperature and other operating conditions.
- Appropriate support resources within prescribed times to transport and operate the equipment.
- Up to 13 small increment (up to 1MW) temporary generation units

CEHE expects to be able to operate the equipment until affected customers are eligible to receive service (i.e. the statutory requirements are no longer met). Depending upon severity of the extreme weather condition, this could range from less than 1 day to 6+ weeks.

Decision Making

CEHE Operations will use the decision making and activation processes established in the Emergency Operations Plan for emergencies needing emergency generation. See *Section 3.2*

[1] As part of a commitment to help meet the State of Texas' immediate energy needs in summer 2025, CenterPoint Energy has proposed to the Electric Reliability Council of Texas (ERCOT) to utilize 15 of the company's large emergency generation units to help address the state's generation shortfall concerns. As outlined before the ERCOT Board in March, and subject to finalization of mutually agreed upon documentation among the relevant parties, including ERCOT and the service provider/operator of the emergency generation units, CenterPoint will send the 15 large emergency generation units to the San Antonio area by summer 2025, for up to two years, which will help the state and ERCOT offset a projected energy shortfall.

for more information. Load shed, load restoration, and mutual assistance may trigger the need for emergency generation.

Concept of Operations

The addition of emergency generation to CEHE's toolkit for Load Shed, EOP Restoration, and Mutual Assistance procedures provides greater flexibility and the ability to segment circuits and find "safe" locations to supply power and bring customers online in hardest hit areas more quickly while working to restore the grid. This allows for different operations, to allocate crews and resources more efficiently, to restore service quickly, and prioritize service restoration to critical customers while leveraging emergency generation. ~~The goal of the Tiger Team is to coordinate with EOP teams (CVAL, TVAL, DVAL, and Government Liaisons) to identify potential locations where the emergency generation can provide support, and, after coordination with stakeholders, mobilize the generation to the most critical areas. The Tiger Team will continue to support the emergency generation throughout the event (vendor communications, fueling, logistics etc.).~~ CNP evaluates and develops strategies for use of temporary generation in emergency response and restoration based on a combination of critical facilities, such as hospitals, warming/cooling centers, etc. and segmented circuits for customer restoration. CNP coordinates with city/county emergency management offices for updates to critical facility prioritization and has a process in place during emergencies for escalation of priorities from external stakeholders.

Based on system needs, and in coordination with appropriate government officials and regulators, CEHE will determine the potential location(s) where the back-up emergency generation ~~-~~facilities ~~will~~may be best utilized, to the extent possible based on actual conditions of a particular event. These determinations will be based on good utility practice, system conditions, and the circumstances and customer needs during each individual event.[3] Some back-up emergency generation facilities listed above have been pre-positioned at certain locations in CEHE's service area and the ~~Emergency Generation Tiger Team~~incident management team will determine how to activate, mobilize, deploy, and either redeploy or demobilize facilities during an event. ~~Some back-up emergency generation facilities listed above have been pre-positioned at certain locations in CEHE's service area.~~ Under the long-term lease agreement, the emergency generation provider must provide transportation and assembly services if emergency generation facilities will need to be relocated. CEHE will coordinate with the emergency generation provider i~~fn the event that~~ the pre-positioned emergency generation facilities need to be relocated to other locations in CEHE's service area during an event as operating conditions, road conditions, and other safety considerations permit.

CEHE's operation of ~~back-up~~temporary emergency generation facilities during an event are not a guarantee against fluctuations, irregularities, or interruptions in delivery service. CEHE's operation of ~~back-up~~temporary emergency generation facilities are subject to the provisions in CEHE's PUCT-approved tariff, including, but not limited to, provisions related to quality of delivery service, emergencies and necessary interruptions, limitation of warranties, and limits on liability.

[3] PURA §§ 39.918 (g)

Activation is called for by RTO/Executive Leadership. From there we have 5 stages typically followed, but we could enter in any one of the first four including immediately moving to level 4. These are defined as levels (Level 1 – Notifications, Level 2 – Preparations, Level 3 – Warm-up of ~~mobile~~ temporary generators, Level 4 – Deployment of ~~mobile~~ temporary generators, i.e. begin operation of generators, Level 5 – Recall of fleet, i.e. shut down and return to "normal ready" state).

As referenced previously, the Company utilizes four emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting customers within CEHE's service territory. The alert levels may be activated, based on need, during a variety of event types. Please see Section A: Overview for additional details regarding the Company's response to emergency events.

Testing

CEHE has a maintenance program with the vendor where ~~mobile~~ temporary generators are maintained on a quarterly basis.

Vendor is responsible for verifying operation/maintaining and performsing quarterly maintenance on the ~~mobile~~ temporary generators and monthly maintenance on the blackstart generators.

Load Shed Process

In the load shed process both the 30 MW generators and the 5 MW generators can be utilized simultaneously. There are triggers that will be leveraged to engage the emergency generation fleet. These include:

Triggers to initiate 30 MW and 5 MW generation load shed deployment

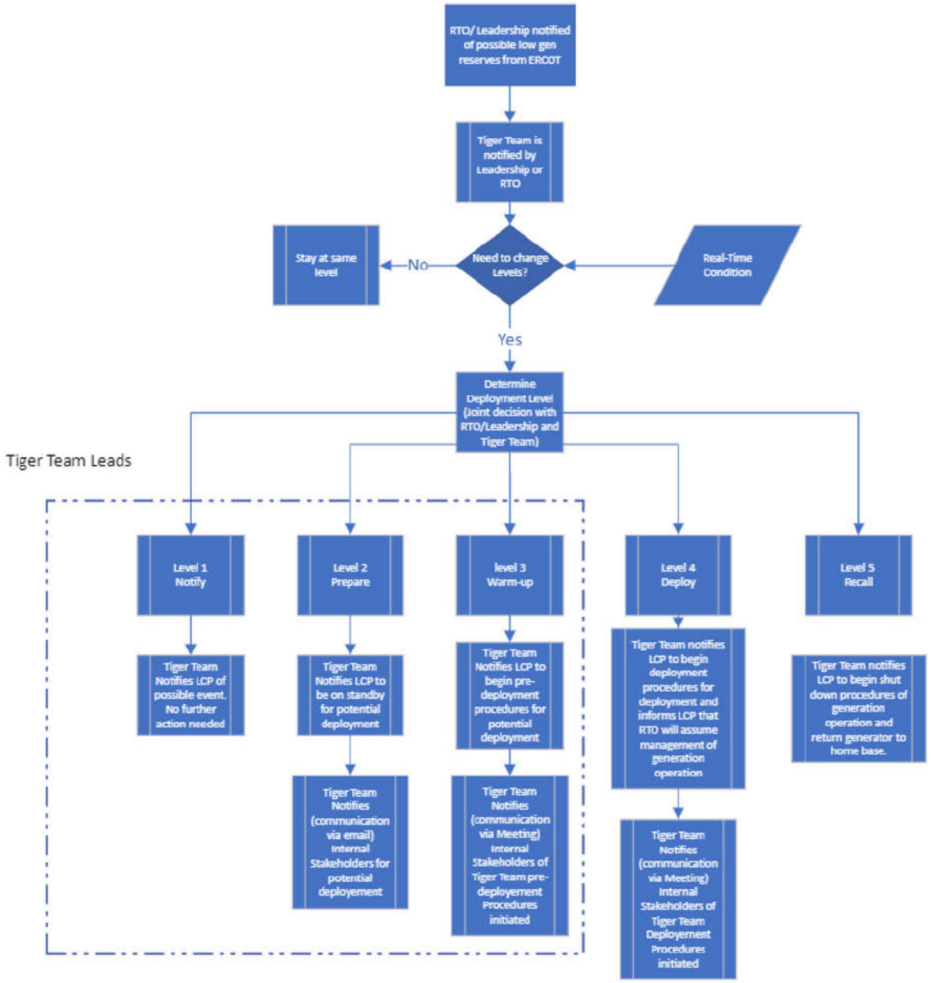
The "home" location for the emergency generation is within 17 substations. In their standard configuration, the units will be connected to an open switch within the substation that allows for ease of interconnection in the event of an anticipated widespread outage lasting longer than 8 hours and is a risk to public safety (legislation as of 09/01/2021). There are 5 trigger levels and action items within load shed events. The emergency generation can be initially deployed at any trigger level based on grid/emergency conditions, as defined by the below flowchart.

These levels include:

- Level 1 – Notify - E-mail ~~Mobile~~ Temporary Gen Contractor of possible deployment, but no action required.
- Level 2 – Prepare - E-mail ~~Mobile~~ Temporary Gen Contractor of anticipated deployment and begin alerting teams. E-mail internal stakeholders making them aware of potential deployment, but no action required yet.
- Level 3 – Warm Up - E-mail/call ~~Mobile~~ Temporary Gen Contractor to dispatch crews to locations, begin generator "warm-up" procedures, and prepare for probable deployment. E-mail/begin call cycles with internal stakeholders making them aware of gen start (warm up) and likely deployment and recommend institution of their respective ~~Mobile~~ Temporary Gen deployment plans.
- Level 4 – Deploy - E-mail/call ~~Mobile~~ Temporary Gen Contractor identifying deployment is imminent and RTO will assume dispatch controls of assets. E-mail/begin/continue call

cycles with internal stakeholders making them aware of gen deployment and to prepare for energization of conductors with ~~mobile~~ Temporary generators and begin support needs.

- Level 5 Recall - E-mail/call ~~Mobile~~ Temporary Gen contractor to verify resources have been released by RTO and allow to begin recall of fleet. E-mail/end call cycles with internal stakeholders making them aware of gen fleet recall and recommend they begin the recall of their respective support measures.



Internal stakeholders' primary functions include:

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- Environmental – Work with Operations on logging of hours of ~~mobile~~ temporary generators are operational ~~ensuring~~ to meet ~~TCEQ~~ Texas Commission on Environmental Quality (TCEQ) requirements ~~are met~~. Tiger Team will receive data from ~~Mobile~~ temporary g~~G~~enerator vendor and store on Teams. Environmental Team will verify data and provide guidance if other items are needed. Environmental will also interface with governmental agencies requesting environmental documentation.
- Safety – Work with all teams on location to verify ~~mobile~~ temporary generator operation and area is safe. Also works with RTO/DCO to verify crews do not work on lines while ~~mobile~~ temporary generators are connected to the distribution grid and are operational (i.e. powering those conductors).
- Procurement – Work with Tiger Team to procure items needed to support ~~mobile~~ temporary generators.
- Fleet – Work with Tiger Team to procure fuel and fuel tanks to support ~~mobile~~ temporary generators.
- Security – Work with Tiger Team on providing security at all generator locations for the duration of the event (including set-up and recall).
- Substation Operations – Support ~~mobile~~ temporary generator operation at substations for the duration of the event (including set-up and recall).
- Major Underground – Support ~~mobile~~ temporary generator operation at substations for the duration of the event (including set-up and recall).
- Distribution Control Operations – Support ~~mobile~~ temporary generator operation through switching orders and assist in isolation and load reduction for the duration of the event (including set-up and recall).
- RTO – Support ~~mobile~~ temporary generator operation by deploying and "controlling" the operation of the assets for the duration of the event. They will be in sole control and call for generator to come online and go offline for the duration of the runtime of the generators during the event.
- AMS Technologies – Will support Transaction Management after the event through providing data to REP's regarding times generator was online and offline to allow REP to provide proper billing.
- Transaction Management (Billing) – Will support REP's through data provided related to ~~mobile~~ temporary generator operation times and grid parallel times. Will need to work in conjunction with AMS Technologies to support this.

A tabular form of the triggers and action items is seen below:

Mobile Generation Triggers and Action Items			
	Load Restoration Triggers		Action Items
	5MW	30MW (Substation need)	
Level 1	Communication from RTO/Leadership on potential event with widespread outage greater than 8* hours and "small" load support possible	Communication from RTO/Leadership on potential event with widespread outage greater than 8* hours and "large" load support possible	E-mail Mobile Gen contractor of possible deployment.
Level 2	Communication from RTO/Leadership on impending event with widespread outage greater than 8* hours and "small" load support expected	Communication from RTO/Leadership on impending event with widespread outage greater than 8* hours and "large" load support expected	E-mail Mobile Gen contractor of an expected event approaching with directive to begin making teams aware of potential deployment need
Level 3	Conference Bridge started with liaisons and discussion around possible locations/timeframes, etc. Directive from RTO/Leadership/CVAL/DVAL/TVAL/Governmental Liaisons on potential pre-deployment restoration locations (begin de-mobilization)	Conference Bridge started with liaisons and discussion around possible locations/timeframes, etc. Directive from RTO/Leadership/CVAL/DVAL/TVAL/Governmental Liaisons on potential pre-deployment restoration locations (begin de-mobilization)	E-mail/call Mobile Gen contractor to ready trucking company/apply for permits and deploy personnel to ready the units for deployment to support potential load restoration applications. E-mail/notify through Teams meeting the internal stakeholders that units are being prepared for deployment and to begin their support procedures (but not deploy yet).
Level 4	Directive from RTO/Leadership/CVAL on deployment restoration locations (begin mobilizing and deployment)	Directive from RTO/Leadership/CVAL on deployment restoration locations (begin mobilizing and deployment)	E-mail/call Mobile Gen contractor to mobilize units to addresses provided and prepare generators for operation. Make mobile generator aware that RTO will assume dispatch control of the mobile generator. E-mail/notify through Teams meeting the internal stakeholders of the mobilization of the generators and that RTO will take over mobile generation operational control
Level 5	Communications from RTO/Leadership to stand down and recall generation fleet	Notify Mobile Gen Contractor to begin cool down process and return fleet to "home base"	E-mail/call Mobile Gen contractor to verify resources have been released and allow to begin recall of fleet. E-mail internal stakeholders making them aware of gen fleet recall.

Operating duration, permitting, and noise concerns

As stated above, the Tiger Team will collect run time data from emergency generation contractor and post to the Tiger Team's website. The Environmental team will manage the logged information provided by the ~~mobile~~ temporary generator contractor and verify for proper operation and adherence to all permitting required for operation. Environmental Team will also interface with all governmental agencies requesting data from run logs for environmental purposes.

Related to noise concerns, it has been determined that City of Houston (COH) Code of Ordinances Chapter 30 provides a waiver when "emergency work" is occurring. A portion of "emergency work" is detailed as "...(iv.) restoring public utilities." Please see attached excerpt from Chapter 30 in Section 10.

STATE OF TEXAS §
§
COUNTY OF HARRIS §

AFFIDAVIT OF DARIN CARROLL

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

1. "My name is Darin Carroll and my current position is Senior Vice President, Electric Business, for CenterPoint Energy Houston Electric, LLC."

2. "I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge."

3. "I have prepared the foregoing direct testimony, and the information contained in this document is true and correct to the best of my knowledge."

Further affiant sayeth not.

Darin Carroll

SUBSCRIBED AND SWORN TO BEFORE ME by the said Darin Carroll on this 24th day of April 2025.

Notary Public, State of Texas

GINA QUIJANO
Notary ID #11953503
My Commission Expires
April 27, 2028

My commission expires: April 27, 2028

DIRECT TESTIMONY

OF

RANDAL M. PRYOR

ON BEHALF OF

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

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LIST OF EXHIBITS

LIST OF WORKPAPERS

EXECUTIVE SUMMARY OF RANDAL M. PRYOR

The Distribution Operations and Service Delivery Division is responsible for the day-to-day operation of CenterPoint Energy Houston Electric, LLC's ("CenterPoint Houston" or the "Company") distribution grid and played an integral role in the Company's ability to respond to and restore distribution service to customers after Hurricane Beryl in July 2024, Hurricane Francine in September 2024, and Winter Storm Enzo in January 2025.

My testimony:

- provides an overview of the Company's distribution system;
- describes the Distribution Operations and Service Delivery Division;
- explains the established programs Distribution Operations relies on annually to maintain the system;
- addresses Company practices for restoration of service after a severe weather event;
- discusses the impacts to the Company's distribution system due to Hurricane Beryl, Hurricane Francine and Winter Storm Enzo;
- addresses the distribution-related costs deferred from Docket No. 57271 related to the Company's pole replacement and feeder damage programs; and
- supports the reasonableness and necessity of Distribution Operations costs incurred for the preparation and restoration efforts related to Hurricane Beryl, Hurricane Francine and Winter Storm Enzo.

Together with the testimony of the Company's other witnesses, my testimony demonstrates that the distribution costs incurred for the preparation and restoration of service efforts in the aftermath of Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo are reasonable and necessary and should be included in the determination of the Company's system restoration costs ("SRCs").

DIRECT TESTIMONY OF RANDAL M. PRYOR

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is Randal M. Pryor, and I am employed by CenterPoint Houston as Vice President, Distribution Operations and Service Delivery. My business address is 1111 Louisiana St., Houston, Texas 77002.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PREVIOUS WORK EXPERIENCE.

A. I graduated from Texas A&M University in 1990 with a Bachelor of Science degree in Agricultural Economics. I began my career with Houston Lighting & Power, a CenterPoint Energy, Inc. ("CNP") predecessor company, in June of 1991. Since that time, I have been employed by CNP or one of its affiliates. My positions within the Company have included Financial Analyst, Supervisor/Manager/Director of Financial Planning, Service Area Director, Operations Director, Vice President of Regional Operations for CNP's Texas gas utility subsidiary, and Vice President of Distribution Operations where I assumed responsibility for all electric distribution operations for the entire greater Houston area. I was named Vice President of Distribution Projects & Grid Modernization, in August 2021, at which time I assumed responsibility for all the Company's distribution projects and grid modernization efforts. In November 2022, I was named Vice President of Major Underground & Distribution Modernization, which includes oversight over major underground operations ("MUG"), distribution metering, and distribution programs. In January 2025, I assumed my present position Vice President, Distribution Operations and Service Delivery, to lead the organization responsible

for CenterPoint Houston's distribution operations, distribution system operations, metering, major underground, underground residential development and streetlight and joint trench programs.

Q WHAT ARE YOUR CURRENT RESPONSIBILITIES?

A. As Vice President of Distribution Operations and Service Delivery, my responsibilities include overseeing electric distribution operations for the entire greater Houston area, which covers approximately 5,000 square miles and delivers electricity to approximately 2.8 million metered customers.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am testifying on behalf of CenterPoint Houston.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS ("COMMISSION") OR ANY OTHER REGULATORY BODY?

A. Yes. I have filed testimony with the Commission in Docket Nos. 49421, 56211, and 57775.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I support the recovery of CenterPoint Houston's reasonable and necessary distribution-related costs that were incurred due to Hurricane Beryl in July 2024 that caused significant damage to CenterPoint Houston's distribution system, as well as the distribution-related costs incurred due to Hurricane Francine in September 2024 and Winter Storm Enzo in January 2025. My testimony provides an overview of the Company's Distribution System, discusses the impacts of

Hurricane Beryl, Hurricane Francine, and Winter Storm Enzo on CenterPoint Houston and its distribution system, addresses the Company's ongoing programs that are designed to support and maintain the distribution system, explains the Company's distribution restoration plan and its implementation related to the three weather events, and addresses the reasonableness of the distribution-related costs associated with preparation and restoration efforts. In addition, my testimony discusses the settlement agreement in Docket No. 57271,[1] specifically related to the pole replacement and feeder damage SRCs incurred due to two storm events that took place in May of 2024.[2]

Q. WHAT EXHIBITS HAVE YOU INCLUDED WITH YOUR TESTIMONY?

A. I have prepared or supervised the preparation of the exhibits listed in the table of contents.

III. CENTERPOINT HOUSTON'S DISTRIBUTION OPERATIONS

A. Organizational Structure

Q. HOW IS DISTRIBUTION OPERATIONS AND SERVICE DELIVERY ORGANIZED?

A. Distribution Operations and Service Delivery currently has service centers that are managed by six Service Area Directors based on geography, a Director of Regional Operations, which includes a Reliability Department, a Director of Distribution Control, a Director of Major Underground Operations, and a Director of

[1] *Application of CenterPoint Energy Houston Electric, LLC for Determination of System Restoration Costs*, Docket No. 57271, Stipulation and Settlement Agreement (Mar. 19, 2025).

[2] The two events included a storm that the National Weather Service officially named "the Houston Derecho," as well as a wave of strong thunderstorms that caused extensive damage in the Houston area on May 28, 2024, collectively referred to in my testimony as the "May 2024 EOP Storms."