Emergency Operations Plan (EOP) Requirements and Filing

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May 29, 2024

Agenda

Topics that will be covered today:

- Statutory authority
- Applicability to operators
- Filing deadline
- How/What to file
- EOP review letters
- Q&A

Statutory Authority (1 of 4)

- Texas Utilities Code §186.008, *Railroad Commission Weather Emergency Preparedness Reports*

Statutory Authority (2 of 4)

- RRC staff report includes data from
  - Reviewing current EOPs
  - Analyzing the ability of electric supply chain to withstand weather emergency events
  - Consideration of weather patterns

Statutory Authority (3 of 4)

- When reviewing EOPs:
  - CIX/Special Project Engineers can make recommendations to improve EOPs
  - RRC does require operators to file updated EOP if it does not contain adequate information

Statutory Authority (4 of 4)

- EOPs are public information
- If portions of the EOP are confidential, the plan can be submitted in redacted form for public inspection

Applicability to Operators

- Section 186.008 (a) states the RRC shall analyze EOPs of operators that:
  - (1) produce, treat, process, pressurize, store or transport natural gas; **AND**
  - (2) are included in the electricity supply chain map adopted by the Texas Energy and Electricity Supply Chain Mapping Committee originally adopted in April 2022

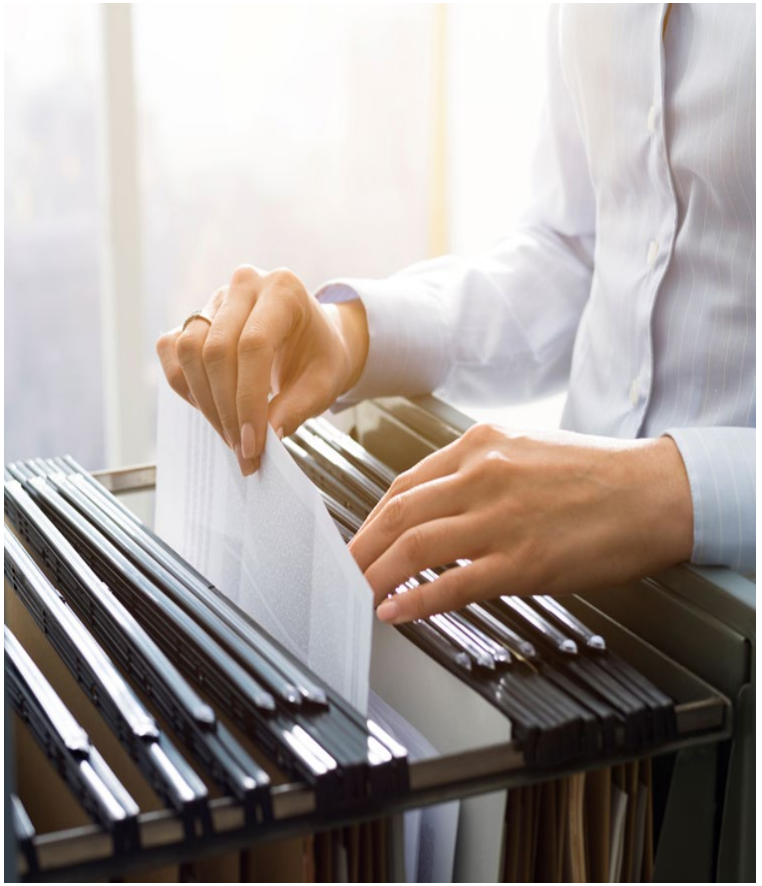
Filing Deadline

- EOPs are due by August 1, 2024
- Operators on supply chain map that are needing to file should have received letter from CID mid May 2024
- EOPs will file through the CID Portal Dashboard on the RRC Online System

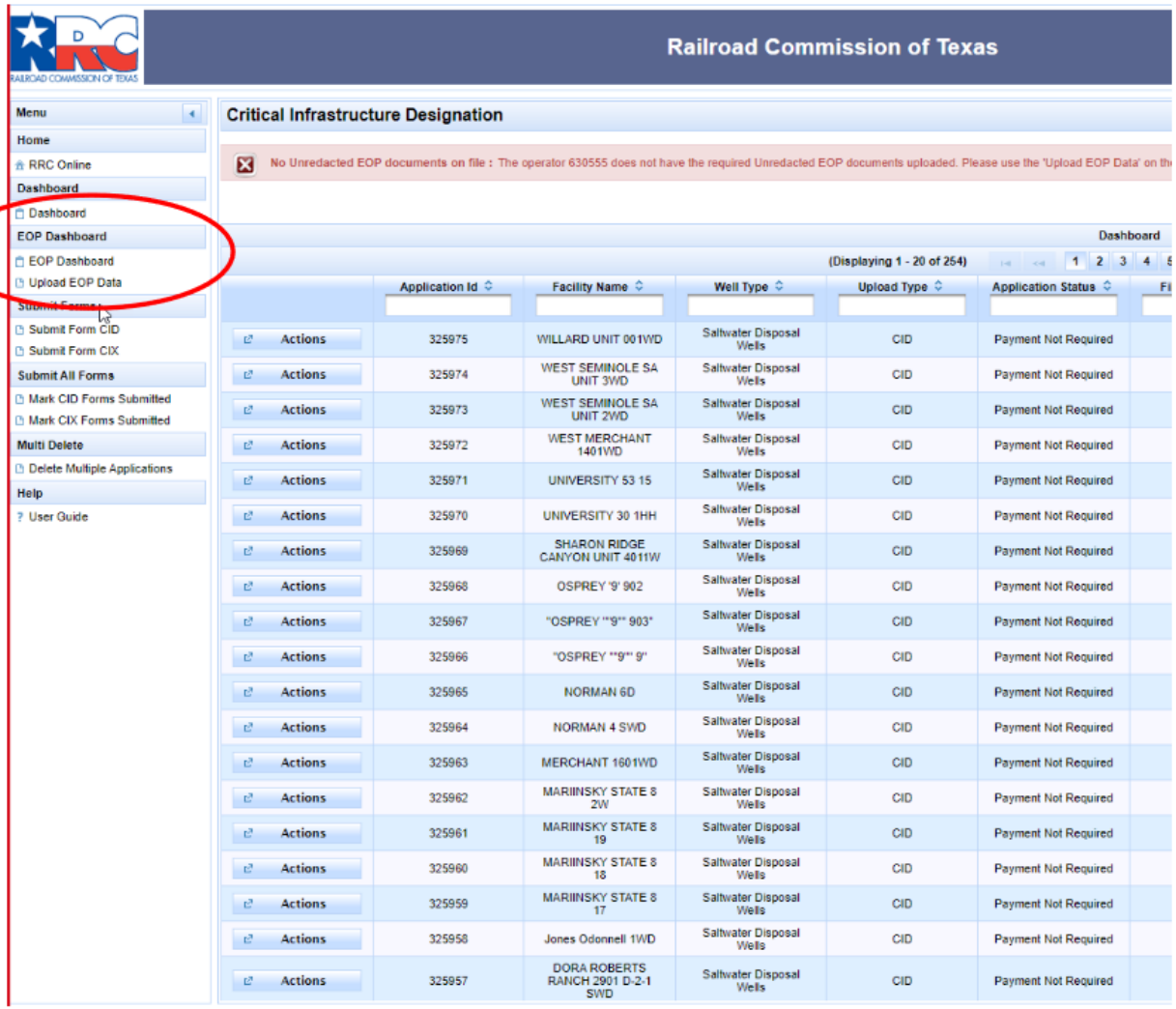
Filing Details (1 of 3)

- Each operator is required to file 1 **unredacted** EOP. An operator may also submit 1 redacted EOP

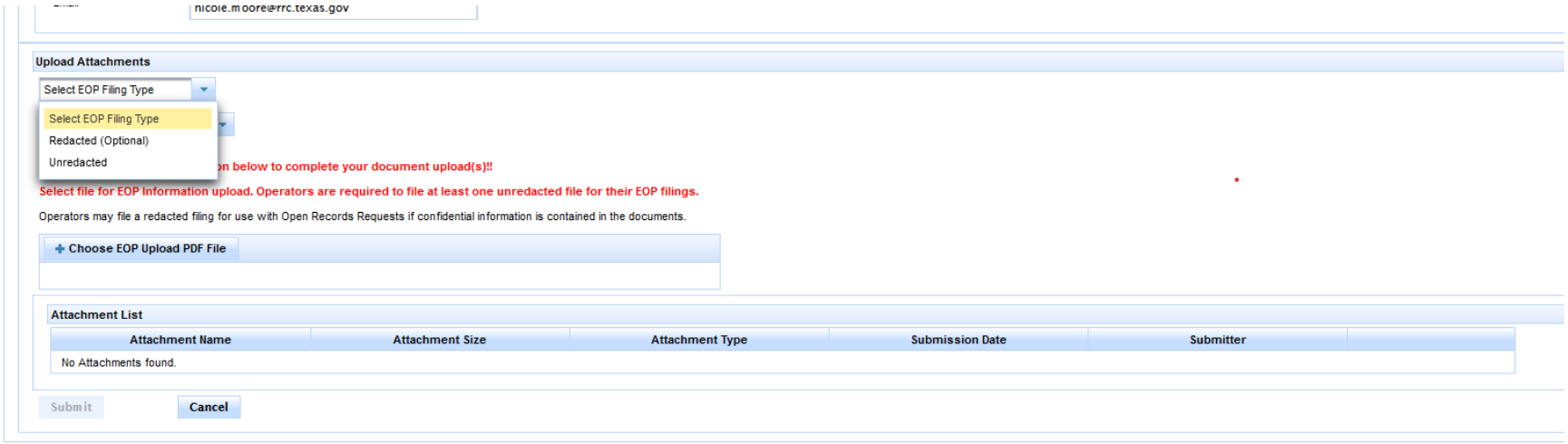
- The filings portal for EOPs is now open and will remain open for any operators to gain compliance



Filing Details (2 of 3)



Filing Details (3 of 3)



EOP Contents (1 of 2)

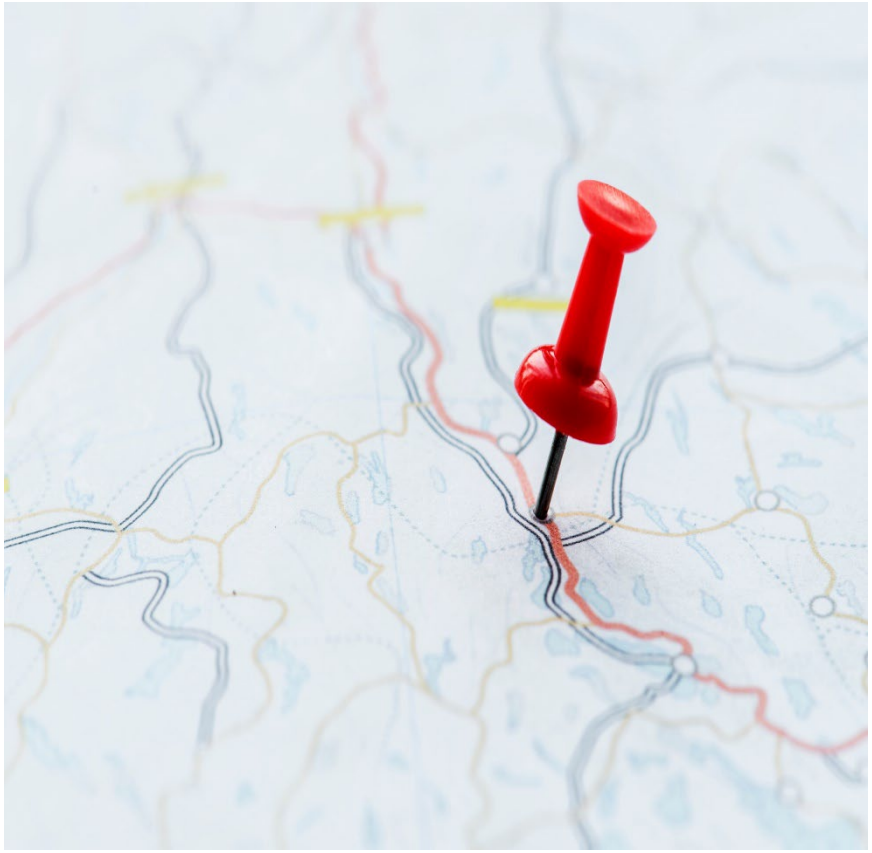
- Only one EOP per P5
- Consolidate all your facilities to one EOP
- EOP should include sections about all the following:
  - Introduction
  - Communication, both internal and external
  - Preparedness

EOP Contents (2 of 2)

- Testing
- Staffing
- Tabletop Exercises/Drills
- Weather Related Hazards
- EOP Activation
- Restoration of Service
- Emergency Contacts

Introduction Section(1 of 2)

- Table of Contents
- Legal name of company and P-5 number
- System(s) Overview including general location and facility types
- Staff training on the contents of the EOP

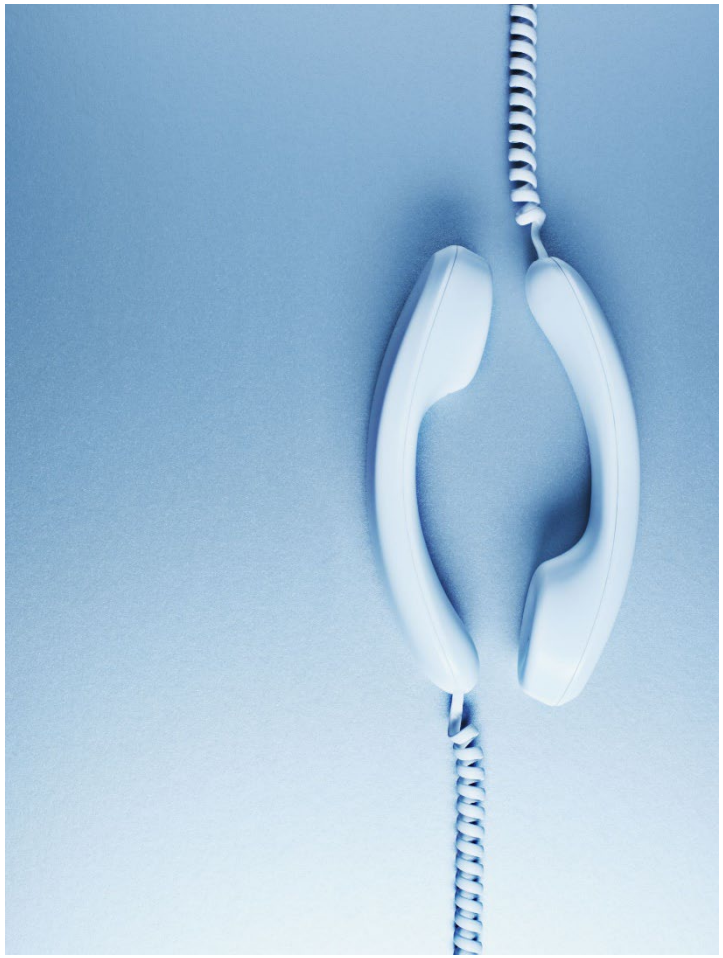


Introduction Section(2 of 2)

- Individual(s) responsible or maintaining and implementing the EOP
- Individual(s) authorized to activate the EOP or sections of the EOP
- Individual(s) authorized to revise the EOP
- Effective date of EOP
- Record of Distribution

Internal Communication

- Procedures for communicating within the company during an emergency
  - Primary and secondary
  - Key employees

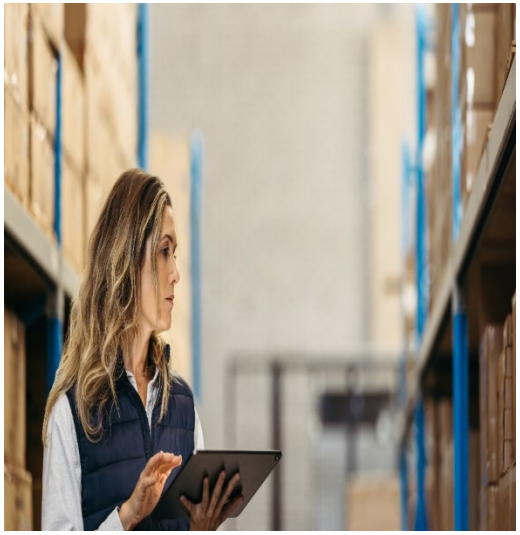


External Communication

- Procedures during an emergency for communication with:
  - Critical customers
  - State and local emergency operations centers (EOCs)
  - Local and state governmental entities and officials
  - RRC
  - Media

Preparedness

- Address the following intended for emergency response:
  - Pre–identified supplies
  - Parts
  - Equipment



Staffing

- Detailed plan that addresses staffing during emergency response.

Testing

- Documentation to function-test existing equipment ahead of emergencies
  - Including back-up generators
  - Known critical failure components

Hazard Responses

- Plans that addresses how you identify weather- related hazards as applicable to your geographic area, including:
  - Tornadoes
  - Hurricanes
  - Rolling blackouts
  - Flooding

Exercises/Drills

- Frequency tabletop or simulated event exercises
- Issues identified and corrective actions taken

EOP Activation

- EOP Response section should include the process the company follows to activate the EOP; and

- The response actions during an emergency once the EOP is activated such as personnel, transportation, communications procedures and the location, use, and maintenance of emergency supplies and equipment

Emergency Contacts

- Should include an Emergency Contact Annex that lists primary and backup emergency contacts for critical facilities
- Should also have a general list of emergent numbers such as local Police Dept, Fire Dept, EOC, RRC District Office, etc.

Restoration

- Detailed plan on Restoration of Service discussing procedures for return to service following disrupted operations

EOP Reviews

- EOPs will be reviewed by RRC staff through the RRC online dashboard
  - **Approved** ⇨ Administratively Complete
  - **Incomplete** ⇨ Returned
  - You may receive a letter stating possible improvements for your EOP, and you are not required to respond to this letter with updates

CID Staff Info

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Q&A

- Please put your questions in the chat