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PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § § §	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC'S
EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

CenterPoint Energy Houston Electric, LLC ("CenterPoint Houston") has filed a complete copy of its Emergency Operations Plan ("EOP") in this Project on March 15, 2023, with all confidential portions removed pursuant to the Public Utility Commission of Texas' ("Commission") Electric Service Emergency Operations Plan rule adopted in Project No. 51841 and codified at 16 Tex. Admin. Code (TAC) § 25.53 (the "EOP Rule"). The executive summary for CenterPoint Houston's EOP, as required by subsection (c)(1)(A)(i) of the EOP Rule, follows.

EXECUTIVE SUMMARY

A. Description of EOP

CenterPoint Houston's EOP is intended to be used to prepare for, mitigate against, respond to and recover from impacts from a variety of emergency events and to safely restore service to customers as safely, quickly, and efficiently as possible. The primary goal of the EOP is the orderly repair and restoration of CenterPoint Houston's electric service facilities after a weather-related or other emergency event, so that public health and safety are protected, and service is restored to all customers in the minimum amount of time through the proper, safe and efficient use of all resources. CenterPoint Houston's goal is to safely restore the greatest number of customers in the least amount of time.

The major elements of CenterPoint Houston's EOP include operational plans, as well as a communications plan and various annexes covering weather emergencies, load shed events, pandemics and epidemics, wildfires, hurricanes, cyber and physical security, and the use of mobile generation/long lead time facilities. Collectively, the information in the EOP will guide CenterPoint Houston's preparations for and actions during an emergency as defined in the EOP Rule.

B. Reference to Specific EOP Sections

CenterPoint Houston's EOP complies with the content requirements contained in subsection (d) of the EOP Rule. The specific sections of the EOP that correspond to those requirements and their respective locations within the EOP are as follows:

EOP Rule Requirement	Location
EOP Rule subsection (d)(1). Approval and implementation section	Section A: Overview
EOP Rule subsection (d)(1)(A). Introduction and applicability	Section A: Overview
EOP Rule subsection (d)(1)(B). List of individuals responsible for maintaining and implementing the EOP, and those who can change the EOP	Section A: Overview
EOP Rule subsection (d)(1)(C). EOP revision control summary that lists the dates for each change made to the EOP	Section A: Overview
EOP Rule subsection (d)(1)(D). Dated statement that the current EOP supersedes previous EOPs	Section A: Overview
EOP Rule subsection (d)(1)(E). Date the current EOP was most recently approved by CenterPoint Energy	Section A: Overview
EOP Rule subsection (d)(2)(A). Communications plan	Section B: Communications Plan
EOP Rule subsection (d)(3). Plan to maintain pre-identified supplies for emergency response	Annex A: Weather Emergency Annex Annex E: Hurricane Annex
EOP Rule subsection (d)(4). Plan that addresses staffing during emergency responses	Section C: ICS Implementation
EOP Rule subsection (d)(5). Plan that addresses how an entity identifies weather-related hazards and the process CenterPoint Energy follows to activate the EOP	Annex A: Weather Emergency Annex Annex E: Hurricane Annex
EOP Rule subsection (d)(6). Relevant annexes	Beginning on page 103 Update to Annex H: Mobile Generation/Long Lead Time Facilities Annex on page 160

C. Record of EOP Access and Training

In accordance with EOP Rule subsections (c)(1)(A)(i)(c) and (c)(4)(A), the table below contains the names and titles of senior persons in CenterPoint Houston's organization who have received training on or formal access to the EOP, including the dates of such training and access.

Name*	Title	Access Date
Lynnae Wilson	Senior VP Electric Business	March 15, 2023
Eric Easton	VP Grid Transformation & Investment Strategy	March 15, 2023
David Mercado	VP High Voltage & System Operations	March 15, 2023
Randy Pryor	VP Major Underground & Distribution Modernization	March 15, 2023
Mandie Shook	VP Electric Engineering	March 15, 2023
Brad Tutunjian	VP Distribution Operations & Service Delivery	March 15, 2023

Employees within each of these officer's respective organization will receive training on and/or access to CenterPoint Houston's plan, and each of the officer is responsible for ensuring they do so.

D. List of CenterPoint Energy EOP Contacts

In accordance with EOP Rule subsection (c)(4)(B), the following table lists the CenterPoint Houston employees who have been designated as the company's primary and backup contacts for urgent Commission requests and questions during an emergency.

Name	Title	Email	Phone
Patrick Reinhart (Primary)	VP Electric Regulatory Relations & Policy	patrick.reinhart@centerpointenergy.com	512-397-3061
Perrin Wall (Backup)	Director, Regulatory Affairs Texas Electric	perrin.wall@centerpointenergy.com	512-397-3048

E. Affidavit

In accordance with EOP Rule subsections (c)(1)(A)(i)(d) and (c)(4)(C), attached to this EOP Executive Summary is the signed affidavit of Lynnae Wilson, CenterPoint Energy's Senior Vice President.

Respectfully submitted,

CenterPoint Energy Houston Electric, LLC

Sam Chang
Senior Counsel
State Bar No. 24078333
1005 Congress Ave, Suite 650
Austin, Texas 78701
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se.chang@centerpointenergy.com

PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § § §	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

AFFIDAVIT OF LYNNAE WILSON

STATE OF TEXAS §
COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared Lynnae Wilson, who, having been placed under oath by me, did depose as follows:

1. My name is Lynnae Wilson. I am over the age of 18 and fully competent to make this affidavit.

2. I am the Senior Vice President, Electric Business, for CenterPoint Energy. As Senior Vice President, I lead and have oversight over the operations of CenterPoint Energy Houston Electric, LLC (CenterPoint Houston).

3. All relevant operating personnel of CenterPoint Houston are familiar with and have received training on the applicable contents and execution of CenterPoint Houston's Emergency Operations Plan (EOP), and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

4. The EOP has been reviewed and approved by the appropriate executives.

5. Drills have been conducted to the extent required by 16 Tex. Admin. Code § 25.53(f).

6. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

7. CenterPoint Houston maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

8. CenterPoint Houston's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700 and IS-800 National Incident Management System (NIMS) training.

Lynnae Wilson

SUBSCRIBED AND SWORN TO BEFORE ME by the said Lynnae Wilson on the 13th day of March, 2023.

Notary Public, State of Texas

KRISTI KEEL
Notary Public, State of Texas
Comm. Expires 03-14-2024
Notary ID 1190550-2

PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § §	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

CENTERPOINT ENERGY HOUSTON ELECTRIC

MARCH 15, 2023

Version 1.1

TABLE OF CONTENTS

Purpose and Scope

The purpose of this manual is to show how CenterPoint Energy Houston Electric, LLC (CEHE and/or the Company) prepares for, responds to, and recovers from events that require the activation of the Emergency Operations Plan.

Section A: Overview

A.1 Comprehensive Summary

A.1.2 Introduction

CEHE provides an essential public service that vitally affects the health, safety, comfort, and general well-being of the people living in the area served by the Company. The goal of the Company's Emergency Operations Plan (EOP) is to prepare for, mitigate against, respond to and recover from impacts from a potential hazard and safely restore service to our customers as safely, quickly, and efficiently as possible.

This EOP is written to support response plans to multiple different events including (but not limited to):

- Hurricane
- Winter Storm
- Severe Thunderstorm
- Pandemic
- Wildfire
- ERCOT Load Shed Event
- Heat/Cold Emergency

A.1.3 Goal

Consistent with the Public Utility Commission of Texas (PUCT) regulatory rules, industry practice, and state and local governments' interests, the primary goal of this EOP is the safe and orderly repair and restoration of the Company's electric service facilities after a weather-

related or other emergency event, so that public health and safety are protected, and service is restored to all customers in the minimum amount of time through the proper, safe and efficient use of all resources. The Company's goal is to safely restore the greatest number of customers in the least amount of time.

Experience has shown that the following factors are critical to successfully achieving this goal: extensive planning, training and exercises, adherence to established processes, and execution that can be scaled quickly to respond to and recover from the emergency situation. This plan provides a basic framework describing who does what and when and is flexible depending on the needs dictated by the emergency.

A.1.4 Safety Practices within EOP

All departments and organizations have standard operating and safety procedures that are well-practiced and adopted for their unique operating area and services. The EOP and Incident Command System (ICS) principles are intended to enhance, not replace, existing procedures. Each area involved in a response should integrate its standard operating and safety procedures as needed into their ICS roles as appropriate. It is important to review how conditions change during specific emergencies—fire, flood, hurricane, earthquake, tornado, hot/cold weather, etc.—and expand traditional safety procedures for any situation if needed.

Every response includes a Safety Officer who is tasked with developing the safety plan specific to the emergency and providing briefing and training to appropriate personnel. In a multi-jurisdictional or multi-discipline response, several organizations may have to contribute their safety procedures to the overall safety plan and agree to resolve any inconsistencies. Having a common safety environment for all responders will contribute to a safe and efficient response and make safety monitoring / observations consistent throughout the response area. In the absence of a formal "site safety plan" for the emergency response, departments should maintain their existing safety procedures as applicable to their response activities. If unknown hazards are encountered, or hazards are present for which safety procedures have not been developed, personnel should stop activities until adequate safety measures can be established.

A.1.5 Key Components of CNP's Plan

Key components of the EOP for the Company are the following:

- Disaster response guidelines
- Overview and use of the Incident Command System (ICS)
- Communication and notification plan for employees, customers, community leaders, emergency operation centers and regulators
- A centralized incident command center with an organization for command and control of emergency response teams
- Systems necessary to support outage management procedures and customer communications

A.1.6 Authorities and References: The Public Utility Commission of Texas Substantive Rules – Chapter 25

The PUCT adopted new P.U.C. Subst. R. §25.53 on February 25, 2022, which requires that each utility file an emergency operations plan (EOP) and executive summary under this section by March 15th of each calendar year. A complete, unredacted copy of this plan is available at the Company's main office for inspection by the PUCT or its staff. The rule is provided at the link below.

https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.53.pdf

A.1.7 Approval and Implementation

The Company's emergency operations plan and accompanying annexes are maintained and revised as needed by multiple departments within the organization. The combined document is ultimately reviewed and approved by the Senior Vice President Houston Electric and Senior Vice President and Deputy General Counsel.

Revision Control Summary

Date of Change	Version Number
April 18 2022	1.0
March 15, 2023	1.1

EOP Version 1.1, was approved by the entity on March 15, 2023, and supersedes any previous EOP document.

A.1.8 Activation of Plan

Introduction

This plan provides a framework for the activation of the EOP. Events that may cause disruption to the area's electric service are varied and unpredictable as to severity and portion of the system affected.

In order 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.

Electric Operations leadership, or authorized designees, shall have the following responsibilities:

- Activating the EOP when a system-wide storm emergency situation exists or a threat is imminent
- Directing all operations once the EOP is activated
- Keeping the President and Chief Executive Officer of CNP informed of system conditions, activities, and progress towards restoration of electric power under the EOP

Activation Alerts

The Company has a three-level alert system for weather and system conditions which are used in operations and are not exclusive to a hurricane, storm, weather related or other event. These three EOP levels are designed to ensure sufficient resources are available to effectively respond to any type of event impacting CEHE's service territory. The Company has implemented a tiered approach to Emergency Operations and utilizes three levels of the Emergency Operations Plan. The following is a summary of the alert levels that may be activated, based on the needs, during a specific type of event:

EOP Level 1:

- Short duration or low impact event affecting the entire CEHE service territory
- Severe impacts to only a specific area of the CEHE service territory
- Additional support roles may be needed

EOP Level 2:

- Medium duration and impact event

- Severe impacts to multiple areas of the CEHE service territory
- Additional support roles needed

EOP Level 3:

- High duration and impact event
- Severe impacts to all or nearly all areas of the CEHE service territory
- All support roles needed unless otherwise notified
- Individual department emergency plans and/or business continuity plans initiated as needed

Regardless of the EOP level declared, employees must be prepared to respond. Employees should connect with their supervisor and know their EOP role if any level of EOP is declared. If necessary and called upon, management is encouraged to release their employees from their normal responsibilities to assist in the EOP response. Since emergency events can change quickly, employees should be prepared to escalate response if necessary.

Employees who have an electric storm assignment that requires participation in any drills will be contacted by their EOP storm response leader and provided with instructions on where to report. For those who do not currently have a role, the EOP team will make assignments after determining where assistance is most needed.

Hazard specific response plans in the Annex of this Emergency Operations Plan identify specific activations triggers, authorities, and levels of activation depending on the specific response.

Section B: Communications Plan

A. INTRODUCTION

A critical component of the Company's response to any emergency is the communication of timely and accurate information to employees, customers, government officials, and other stakeholders. The primary objectives of the EOP 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 employees, management, the general public, governmental officials, and other key stakeholders through traditional and social media.

The EOP Communications Plan is designed to achieve the Company's communications objectives and may be implemented at the discretion of the Public Information Officer. The EOP Communications Plan consists of, but is not limited to, the following functions:

- Public Information Officer
    - Maintain the Company's credibility and reputation
    - Execution of key decisions and deliverables
    - Identification of appropriate communication channels during the event
    - After-action review to identify areas of plan enhancement
- Media Relations (Public Communications Manager)
    - Write news releases with safety tips
    - Hold news conferences, as necessary
    - Monitor news coverage
- Customer Communications (Director, Marketing)
    - Web Communications (Digital Channel Manager)
        - Web updates
        - Advertising support
        - Power Alert Service
        - Email communications

    - Outbound customer phone calls
- Social Media (Marketing Creative and Brand Manager)
    - Monitor social media and public sentiment
    - Provide social media updates
    - Receive field reports from Crew Spokesperson Leads for neighborhood-level updates
    - Direct photography and video
    - Enable and manage employee ambassadors
- Customer Sentiment, Analytics and Reporting (Market Research Manager)
    - Conduct and analyze Voice of the Customer surveys for Contact Center, Social Media, and Web
    - Collect data from channels and prepare executive reports
    - Conduct post-event surveys as needed
- Employee Communications and Documentation (Employee Communications Manager)
    - Newsletters, intranet, digital signs
    - Setup and update Employee storm hotline, if necessary
- Customer Service (Customer Service Liaison Manager)
    - Liaison to Customer Service and Regulatory, including government liaisons
    - Respond to customer service requests on social media (Customer Experience Resolution Team (CERT) and OCS as needed)
- Crew Spokespersons (Crew Spokespersons Branch Director)
    - Liaison with the general public while crews perform restoration activities
    - Provide field reports to Web/Social Media Channel Branch
- Regulatory, Government Liaison (Director, Government Policy)
    - Communicate with county, state, regulatory and City of Houston officials

Although a team under the Public Information Officer will be organized and charged with performing specialized tasks during the emergency, everyone may be called upon to assume extra duties and responsibilities, including Minnesota and Indiana communications staff, as part of the overall team effort. Marketing will work in conjunction with Corporate Communications.

The Company maintains a 24-hour Call Center for customer service, so customer service personnel are available in the event of an emergency. To supplement these personnel during an emergency, the Manager of the Call Center may implement call-out procedures. At that time, additional personnel report to the call center. If necessary, other Company personnel designated for telephone duty will be notified to report to their temporary work assignment. The Company, during major storms, may activate a third-party High-Volume Call Answering system (HVCA) that can handle the maximum number of calls received. The HVCA system allows customers to report outages and generate an outage report to the Company's crews. The Manager of the Call Center works to adequately staff telephones until the emergency situation has ended.

B. PRE-EVENT PROCEDURES

The Company strives to provide prompt notification about potential or actual events to the public through regular news releases and media advisories on current emergency status and restoration activities. This information is distributed to the media through multiple communication channels and posted on the Internet site of CenterPoint Energy, Inc. (CNP). The Public Information Officer arranges news conferences, media interviews, and access to restoration activities for news footage as needed. Collaboration with internal Marketing is also maintained for consistency in messaging to all stakeholders.

The Company maintains liaisons with various first responders and emergency management organizations, as well as third-party assistance agencies and public officials throughout the 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 Department of Energy, the North American Electric Reliability Corporation (NERC), and the Texas Reliability entity, as appropriate.

In the event of an emergency, the communications team would operate at the Incident Command Center or at a designated location. The communications team will operate 24-hours-a-day, or as required until normal schedules can be resumed.

1. 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

2. Public Information Office personnel will be advised to:
   - Pack a bag of personal necessities
   - Bring personal cameras (i.e., smart phone) 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
3. An extended work schedule of up to 16-hour shifts (or longer, if needed) may also be determined at this time; designated team members will be asked to make necessary arrangements to report for duty.
4. 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.
5. Under the guidance of the Public Information Officer, the team also will have the responsibility for communicating to our external customers and the media before an event.
   - In the event of a crisis, contact with the local news media will be established as soon as deemed necessary
   - Pre-written media advisories will be distributed
   - Information on how to track outages and restoration information on demand (e.g., Outage Tracker Web application, Twitter 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, including videos, on the restoration and prioritization process, FAQs, safety tips, etc.
   - Pre-storm advertising to alert the public about the length of potential outages,

safety tips and how to prepare

- CenterPointEnergy.com dark site (Web page to be used in the event main site is unavailable) will be updated and verified ready for use

C. DUTIES DURING EVENT

1. 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.
2. 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 CNP's event. The Public Information Officer or a designated person will approve the information.
    - Information will be collected from Distribution Evaluation (DVAL) and Central Evaluation (CVAL). In a natural gas emergency, information will be collected from the Gas Dispatching
    - 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
3. News conferences may be held, as necessary, at various locations depending on the event and road conditions.
4. Calls, Social Media inquiries, Monitor 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 .

5. 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 ICC and emergency management personnel, commiserate 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 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. This information will be vetted by Safety and Legal as needed before posting online.

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.

6. 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

D. POST-EVENT DUTIES – RETURN TO NORMAL OPERATIONS

When the Incident Commander determines that an emergency has ended, and the Public Information Officer (or designated person) will announce a return to normal operations. The team will notify Company departments, government offices and other appropriate stakeholders that communications with the Company can now be conducted through normal channels.

1. Critique Crisis Communication Plan Efforts. As soon as possible after the event, the team will analyze the effectiveness of their efforts and recommend improvements in the process.
2. Maintain Historical Record of Event. In conjunction with the Legal Department, the team will develop a historical record of the emergency. This record will include an event chronology, media advisories and news releases, media coverage, internal communications coverage and a summary report describing the event and CNP's response.

At the conclusion of the incident, and in coordination with Emergency Operations, the Incident Command team, and the Corporate Response Plan Team (when applicable), the Communications team participates in a thorough after-action review to identify areas of plan enhancement. Any necessary updates to the communication plan, policies and procedures are completed, along with necessary training to impacted functions for alignment on plan enhancements.

Section C: ICS Implementation

The purpose of this section is to describe the operational organization utilized to respond to an EOP event and outline the various roles and responsibilities related to the EOP response. This section provides information on:

- The Incident Command System (ICS) and its utilization by the Company during an EOP event
- The ICS Planning Process as implemented by the Company

C.1 Introduction to ICS at CNP

Introduction
This section provides an overview of the ICS and describes the manner in which departmental staff utilizes ICS to plan for, respond to, and recover from an EOP event.

History
ICS, a component of the National Incident Management System (NIMS), is a fundamental element of incident management which provides standardization through the use of common terminology and a scalable organizational structure. The ICS process and structure establishes clear roles and responsibilities and provides a process for aligning and documenting activities and information across organizations and departments. The Incident Command System (ICS) is a widely applicable management system designed to enable effective and efficientincident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. ICS is normally structured to facilitate activities in five major functional areas: command, operations, planning, logistics, finance and administration. At each level of the ICS organization, individuals with primary responsibility positions have distinct titles which provide a common standard for all users.

ICS is based on 14 proven management characteristics, each of which contributes to the strength and efficiency of the overall system:

1. Common Terminology

2. Modular Organization
3. Management by Objectives
4. Incident Action Planning
5. Manageable Spans of Control
6. Incident Facilities and Locations
7. Comprehensive Resource Management
8. Integrated Communications
9. Establishment and Transfer of Command
10. Unity of Command and Span of Control
11. Unified Command
12. Dispatch/Deployment
13. Accountability
14. Information and Intelligence Management

C.2 Incident Action Planning (IAP) Process

C.2.1 Summary

In keeping with the NIMS ICS recommended practices, the Company will develop an Incident Action Plan (IAP) to help manage the response. Incident action planning ensures that the Company has a common operating picture when responding to an EOP event. The purpose of developing an IAP is to:

- Help achieve management by objectives
- Synchronize operations at the incident level
- Create an officially approved and documented plan for the next operational period
- Document a common set of objectives for response and recovery
- Ensure incident operations support the objectives

C.2.2 Introduction to Incident Action Planning at CNP

Incident action planning provides a standardized decision-making approach. The Incident Management Team (IMT) will be established for each event and can utilize incident action planning to collect, analyze, and disseminate information in order to create and maintain a common operating picture during the response to an emergency, such as a severe storm event. Incident action planning aligns objectives, resources, and schedules by establishing a single set of objectives and setting a regular frequency (operational period) for planning, communicating, and completing work. In addition, incident action planning provides a process to track objectives, tasks, and resources. The primary planning tool developed during each operational planning cycle is the IAP. An IAP:

- Establishes direction and priorities for operations in the form of overall objectives
- Establishes operational objectives for each IMT function and tracks the progress. I don't recall hearing about IMT before and am not sure how it' fits with the incident comment team, etc.
- Provides for accountability and reduces redundancy
- Provides valuable documentation for After-Action Reports

An IAP is comprised of a series of standard ICS forms that convey the incident status, objectives, work assignments, safety guidelines, and required resources. These forms should be utilized by the IMT, whenever possible. An IAP is produced by the Incident Command Center (ICC) for each operational period. It is approved by the Incident Commander prior to implementation. In general, an IAP will include the following elements:

- Cover page
- Incident objectives and priorities (ICS 202)
- Management structure (ICS 207)
- Kinds and numbers of response resources assigned (ICS 204)
- Medical plan (ICS 206)
- Safety guidelines (ICS 208)

- Daily meeting schedule (ICS 230)
- Tactics summary (ICS 234)
- Other information as required

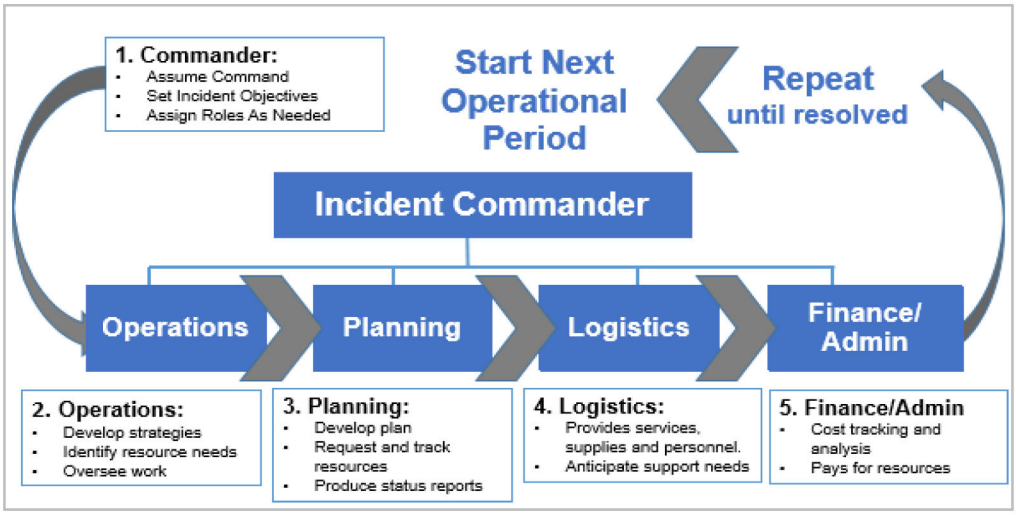
Incident action planning will occur for all events that require the activation of the EOP. However, depending on the event and level of activation, the use of all of the forms listed above is not required. It is the discretion of the Incident Management Team to decide which forms are applicable to the event. Activation of the EOP may also result in the activation of the ICC at the Greenspoint Annex Building, CNP Tower (13th Floor) or any other location the Incident Commander determines would best serve the response.

C.2.3 Correlation to ICS

As described earlier in this Manual, the Company has adopted the Incident Command System (ICS). ICS, a component of the National Incident Management System (NIMS), is a fundamental element of incident management which provides standardization through the use of common terminology and a scalable organizational structure. The ICS process and structure establishes clear roles and responsibilities and provides a process for aligning and documenting activities and information across organizations and departments.

The Company utilizes ICS to manage large-scale incidents. An IAP is developed within the ICS structure to plan CNP's response operations.

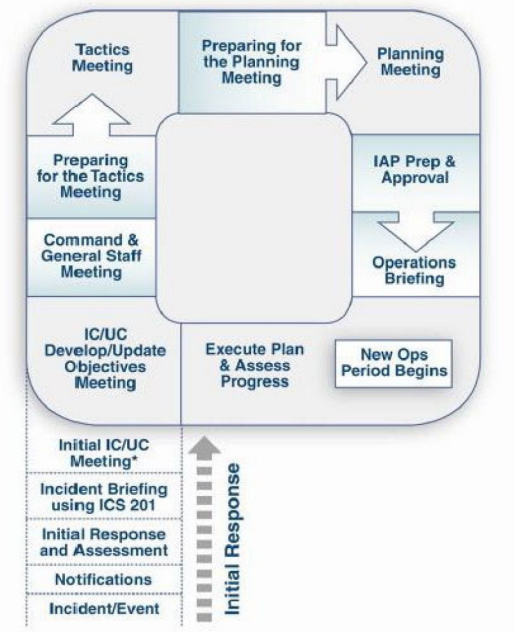
The basic process for Incident Action Planning by ICS role is summarized as follows. Specific requirements and responsibilities will vary by incident.



C.2.4 Operational Planning Cycle/ Planning "P"

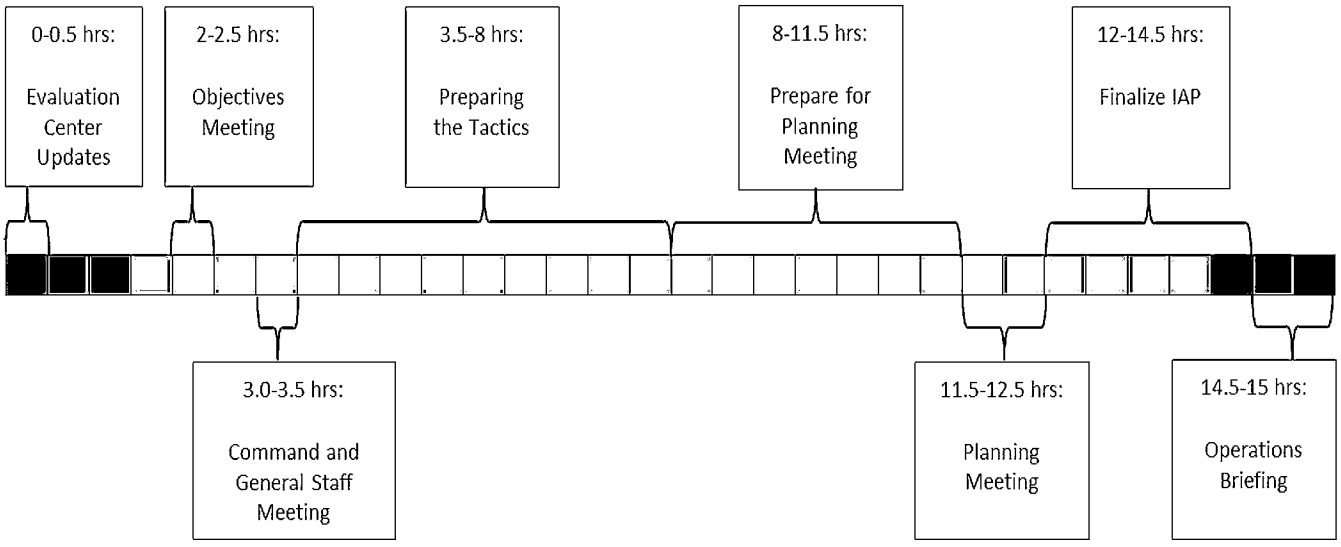
An IAP is developed for each operational period. Incident Action Planning is guided by the Planning "P" (see below).

Operational Period Planning Cycle- "The Planning P"



The Planning "P" is a guide to the process and steps involved in planning for an incident. The leg of the "P" describes the initial response period. Once the incident begins, the steps are Notifications, Initial Response and Assessment, Incident Briefing, and Initial Incident Command/Unified Command Meeting. The top of the leg of the "P" is the beginning of the first operational planning period cycle. The circular sequence outlines the planning meetings and steps that are completed in each operational period in order to develop an IAP. The steps in the circular portion of the Planning P are completed for each operational period until the IMT is demobilized.

The graphic below presents a timeline of the recurring planning meetings and steps and provides a guide as to when these steps should occur during a given 16-hour operational period:



C.2.5 Initial Response and Assessment

Initial Response and Assessment occurs immediately after a disaster or other event is identified and appropriate notifications are made. This initial response could include damage assessments made by the Company post hurricane landfall, outage evaluations post thunderstorm, or system status post cyber-attack. During the initial response to any incident, regardless of incident classification level, the status, incident objectives, and resources needed to effectively and efficiently respond to the incident may be communicated verbally.

Minimally, the following information should be communicated during the initial response period (before the IMT is fully activated and mobilized):

- Individual leading incident response
- Information regarding the threat (storm course, dates, times, and locations)
- Status of the impacts
- Current incident objectives
- Resources needed to meet incident objectives

C.2.6 Evaluation Center Updates

This step provides Operations Branch Directors an opportunity to receive an update on any progress achieved since the end of the previous operational period. It is also where the Branch Director will formally communicate the objectives for the operating period. These objectives were defined and communicated during the previous operational period. If this is the first operational period, this is the opportunity to define initial response objectives. The information collected in these updates will vary by branch, but should include:

- Services or repairs required at Company facilities;
- Initial damage observed;
- Resource status (personnel reporting, fleet, etc.);
- Outages; and
- Current day's actions (1st operational period) or objectives/ tactics (2nd operational period)

A staff member from the Planning Section shall complete the Incident Briefing Form (ICS 201) based on the information provided during the evaluation center updates. The ICS 201 form serves as a permanent record of the situation status as of the start of the operational period.

C.2.7 Incident Brief

This step provides a briefing of the event to the incoming Incident Commander and Command and General Staff early in the current operational period. For CNP, the incident briefing will take the form of a conference call where all evaluation centers submit a verbal situation report to the Incident Commander and the IMT. Safety concerns, initial impact assessments, and actions taken will be conveyed. The Command and General Staff will attend and the Incident Commander, Planning Section Chief or Emergency Operations will facilitate the discussion. Participants include:

- Incident Commander;
- Command Staff;
- General Staff;
- Section Chiefs (Operations, Logistics, Planning, and Finance);
- Applicable Operations Branch Directors (i.e. Distribution Operations, Transmission/Substation, Vegetation Management, Grid and Market Operations, Technology Operations); and
- Major Underground Manager (if applicable for the response).
- Other functional and support leaders as appropriate

A staff member from the Planning Section shall complete the Incident Briefing Form (ICS 201) based on the information provided during the incident briefing conference call.

C.2.7.1 Meeting Details

In preparation for the Incident Brief, a quiet space shall be reserved, and any maps or other materials needed to assist with situational awareness (e.g. damage assessment information) shall be made available to meeting participants.

When:	Before Objectives Meeting
Attendees:	Incident Commander Command and General Staff Branch Directors
Facilitator:	Planning Section Chief
Tasks:	<u>Incident Commander</u> • Provides direction/guidance/clarification • Provides leadership presence and motivation <u>Operations Section Chief and Branch Directors</u> • Provide an update on current operations <u>Technology Operations Officer</u> • Provide an update on current operations <u>Planning Section Chief</u> • Facilitates the meeting • Resolves questions • Records action items as required • Updates on resource status <u>Logistics Section Chief</u> • Briefs transportation, communication, and supply issues <u>Safety Officer</u> • Provides a safety briefing • Other functional and support reports as appropriate
Outcomes:	• ICS 201 – Incident Brief

C.2.8 Objectives Meeting

The purpose of the Objectives Meeting is to establish incident objectives for the next operational period. Incident objectives shall be specific, measurable, action-oriented, realistic, and time-sensitive (SMART). Incident objectives are established based on the following priorities:

- Safety (workforce, public, etc.).
- Incident stabilization and/or restoration of operations and services
- Property preservation

In addition to establishing incident objectives during the Objectives Meeting, the Incident Commander may also set response priorities, identify any limitations and constraints, and develop guidelines for the IMT to follow. Products (ICS forms and other documentation) resulting from the Objectives Meeting will be presented at the Command and General Staff meeting. For recurring meetings (Objective Meetings in subsequent operational periods), products from the previous Objectives Meeting will be reviewed and updated as needed.

The initial Objectives Meeting shall be held as soon as reasonably possible after the IMT (including the ICC and evaluation centers) are able to convene and/or at the direction of the Incident Commander. The Objectives Meeting and the Command and General Staff Meeting may be combined if practical. The duration of the Objectives Meeting should not exceed 30 minutes.

C.2.8.1 Meeting Details

In preparation for the Objectives Meeting, a quiet space shall be reserved and any maps or other materials needed to assist with situational awareness (e.g. damage assessment information) shall be made available to meeting participants.

When:	**Before Command Staff Meeting**
Attendees:	**Incident Commander** **Command Officers and General Staff Section Chiefs** **Situation Planning Branch Director**
Facilitator:	**Incident Commander or Planning Section Chief**
Tasks:	**Incident Commander** • **Develop incident objectives and command emphasis (ICS 202)** • **Develop tasks for Command and General Staff in response to open items (ICS 233)** **Planning Section Chief** • **Facilitate and document meeting** • **Propose draft objectives to Command**
Outcomes:	• **ICS 202 - Incident Objectives** • **Updated ICS 233 – Incident Open Action Tracker**

C.2.9 Command and General Staff Meeting

The Command and General Staff Meeting is an opportunity for the Incident Commander to meet with the Command and General Staff and Branch Directors to present their decisions and management direction. The Command and General Staff Meeting clarifies and helps to ensure understanding among the leadership on the decisions, objectives, and priorities determined by the Incident Commander. In addition to the information provided by the Incident Commander, the Operations Section Chief, Planning Section Chief, and Situation Planning Branch Director may also provide situation updates.

The Command and General Staff Meeting shall be held immediately following the Objectives Meeting. The duration of the Command and General Staff Meeting should not exceed 30 minutes.

C.2.9.1 Meeting Details

In preparation for the Command and General Staff Meeting, the facilitator shall review the meeting agenda, current IAP (ICS 201 or IAP from previous operational period), status information, and the upcoming operational period's objectives.

When:	**Following the Objectives Meeting and prior to Preparing the Tactics**
Attendees:	**Incident Commander** **Command and General Staff** **Branch Directors**
Facilitator:	**Planning Section Chief**
Tasks:	**Incident Commander** • **Review status of open actions, work assignments (tasks) from previous meeting (ICS 233).** • **Present objectives for the upcoming operational period.** **Operations Section Chief** • **Provide update on current operations.** **Planning Section Chief** • **Facilitate meeting.** • **Facilitate discussion on proposed objectives.** **Situation Planning Branch Director** • **Remind staff to begin preparing tactics.** **Status Documentation Branch Director** • **Document meeting and distribute meeting materials.** • Other function and support reports as appropriate
Outcomes:	• **Updated ICS 202 - Incident Objectives, if necessary** • **Updated ICS 233 - Incident Open Action Tracker, if necessary**

C.2.10 Preparing the Tactics

This is a period of time where strategies and tactics are developed for later discussion and review at the Planning Meeting. In particular, the Operations Branch Directors and Planning Liaisons will review incident objectives (ICS 202) to determine responsibilities of the Operations Branch Directors and consider Command priorities. The Operations Branch Directors will then work with his/her Section Chiefs and Coordinating Staff to develop strategies and tactics to meet the incident objectives. Additionally, the Safety Officer will evaluate and plan for potential safety hazards.

C.2.10.1 Details

The Operation Branch Directors, with support from their Planning Liaisons and Coordinating Staff, must determine the strategies and tactics required to accomplish the Incident Commander's objectives. The ICS 234 Tactics Worksheet will be used to work through and document this process. Also, the Planning Liaisons shall ensure that the material, information, and resources that will be presented at the Planning Meeting are organized and accurate. The time allocated for the preparation of tactics will vary depending on the incident and stage of the response. For example, a large-scale Hurricane, Storm or Ice response with 16-hour IMT work shifts, longer time periods maybe allocated for this activity. Other events should adjust this planning time accordingly.

When:	**Following the Command and General Staff Meeting and prior to the preparing for the Planning Meeting**
Participants:	**Operation Branch Directors** **Planning Liaison** **Logistics Liaison** **Safety Officer** **Technical Specialists, as needed**
Facilitator:	**Planning Liaison**

Tasks:	<u>Operations Branch Directors and supporting staff</u> • Develop draft strategies and tactics for incident objectives (ICS 234) <u>Planning Liaisons</u> • Synthesize information to prepare for the Planning Meeting • Provide information regarding resource status to the Operations Branch Directors <u>Logistics Liaisons</u> • Provide information regarding the status of available materials and supplies to the Operations Branch Directors
Outcomes:	• ICS 234 - Tactics Worksheet
Reports due from:	• Major Underground • Incident Command • Transmission/Substation • Technology Operations • Distribution • Additional Areas as required

C.2.11 Prepare for Planning Meeting

This is a period of time whereby the Command and General Staffs prepare for the upcoming Planning Meeting. As such, all draft strategies and tactics developed to accomplish the incident objectives for the next operational period will need to be completed.

C.2.11.1 Preparation Details

Prior to the Planning Meeting, the Command and General Staff will need to work together to prepare for the Planning Meeting. The Planning Section Chief shall facilitate/support the preparations for the Planning Meeting. The Planning Section Chief also ensures the material, information, and resources used or discussed in the Planning Meeting are completed and ready for presentation during the meeting. Concurrently, the Operations Section Chief will prepare a final draft of the ICS 234, based on input from the Preparing the Tactics, operations updates, and coordination with the Planning Section, as needed.

For the beginning of a large-scale response with 16-hour IMT shifts, 3.5 hours is allocated for this activity. Adjust this time accordingly for other responses with shorter operational periods.

When:	**Following the Preparing the Tactics and prior to the Planning Meeting**
Participants:	**Command Staff** **General Staff** **Technical Specialists, as needed**
Facilitator:	**Planning Section Chief**

Tasks:	**PREPARATION FOR PLANNING MEETING** **Incident Commander** • **Prepare further guidance/clarification** • **As needed, meet informally with appropriate staff members** **Operations Section Chief** • **Prepare operations update** • **Prepare final draft of the Tactics Worksheet (ICS 234)** • **Coordinate with other staff as needed.** **Situation Planning Branch Director** • **Prepare final draft of the Incident Objectives (ICS 202)** • **Prepare final draft of the Incident Organization Chart (ICS 207)** • **Prepare final draft of the Daily Meeting Schedule (ICS 230)** • **Assist with final draft of the Tactics Worksheet (ICS 234)** **Logistics Section Chief** • **Consider support requirements to support IAP** • **Verify support requirements** **Resource Acquisition / Resource Unit Branch Directors** • **Prepare final draft of Resource Summary (ICS 204)** **Safety Officer** • **Prepare final draft of the Medical Plan (ICS 206)**
	• **Prepare final draft of the Safety Plan (ICS 208)**
Outcomes:	• **Final drafts of:** ○ **ICS 202 – Incident Objectives** ○ **ICS 204 – Resource Summary** ○ **ICS 206 – Medical Plan**

	○ **ICS 207 – Incident Organization Chart** ○ **ICS 208 – Safety Plan** ○ **ICS 230 – Daily Meeting Schedule** ○ **ICS 234 – Tactics Worksheet**

C.2.12 Planning Meeting

The Planning Meeting is the culmination of all meetings that have taken place prior to this meeting. The Planning Meeting provides the opportunity for the Incident Commander, Command Staff, and General Staff to review and validate the proposed tactical plan to achieve the Incident Commander's direction, priorities, and objectives.

The Operations Section Chief will present the tactical plan that was developed to meet the Incident Commander's objectives, including proposed resources, and support requirements. In turn, attendees will review and provide feedback on the proposed plan.

The Planning Meeting provides the opportunity for Command and General Staff to discuss and resolve any issues and concerns prior to assembling the IAP. After the review is complete and updates are made, the attendees commit to support the plan. The final IAP is compiled following the Planning Meeting.

The duration of the Planning Meeting should not exceed 1 hour.

C.2.12.1 Meeting Details

When:	Following the Preparing of Tactics and preparations for the Planning Meeting
Attendees:	Incident Commander Command Staff General Staff Situation Planning Branch Director Resource Acquisition Branch Director

	Status Documentation Branch Director Technical Specialists, as needed
Facilitator:	Planning Section Chief
Tasks:	<u>Incident Commander</u> • Ensure all direction, priorities, and objectives have been met • Provide further direction and resolve differences as needed • Give approval of proposed IAP <u>Operations Section Chief</u> • Present an operations update
	• Present plan of action <u>Planning Section Chief</u> • Facilitate meeting • Facilitate discussion on the proposed plan • Record action items <u>Resource Acquisition / Resource Unit Branch Director</u> • Present resource status <u>Status Documentation Branch Director</u> • Document meeting
Outcomes:	• Final Incident Action Plan: ○ ICS 202 – Incident Objectives ○ ICS 204 – Resource Summary ○ ICS 206 – Medical Plan ○ ICS 207 – Incident Organization Chart ○ ICS 208 – Safety Plan ○ ICS 230 – Daily Meeting Schedule ○ ICS 234 – Tactics Worksheet

C.2.13 IAP Preparation and Approval

Following the Planning Meeting, IMT members must complete the assigned tasks/products that are required for inclusion in the IAP. IMT members must meet the deadlines set by the Planning Section Chief so that the Planning Section has requisite time to assemble the IAP components.

C.2.13.1 IAP Preparation and Approval Process Information

When:	Immediately following the Planning Meeting
Facilitator:	Planning Section Chief
Tasks:	Incident Commander • Reviews, approves, and signs IAP Operations Section Chief • Provides required information for inclusion in the IAP • Works with the Planning Section to ensure the organizational chart and ICS 204s are complete Planning Section Chief • Reviews IAP for completeness • Provides completed IAP to Incident Commander for review/approval Status Documentation Branch Director • Facilitates gathering of required documents and assembles IAP • Distributes IAP to the appropriate parties and files the original Logistics Section Chief • Reviews Logistics Section products for completeness • Provides logistics information for the IAP • Verifies resources ordered status Finance/Admin Section Chief • Verifies financial and administrative requirements for the IAP

IAP Components	Form	Final Responsibility to Complete
	Cover Page	Planning Section Chief
	ICS 202: Incident Objectives	Planning Section Chief
	ICS 204: Field Assignment List	Resource Unit Branch Director, in coordination with the Resource Acquisition Branch Director
	ICS 206: Medical Plan	Safety Officer
	ICS 207: Incident Organization Chart	Situation Planning Branch Director
	ICS 208: Safety Message	Safety Officer
	ICS 230: Daily Meeting Schedule	Situation Planning Branch Director
	ICS 234: Tactics Worksheet	Operations Section Chief, in coordination with Planning Section

C.2.14 Operations Briefing

The Operations Briefing is conducted at the end of each operational period. At the Operations Briefing, the IAP is presented to supervisors of tactical resources. During the Operations Briefing, the Operations Section Chief briefs the organization and provides clarification regarding any of the tactical assignments. Command and General Staff provide information regarding other key information as necessary. The Operations Briefing shall be 30 minutes or less in duration.

C.2.14.1 Meeting Details

When:	At the start of the next operational period.
Attendees:	Incident Commander Command and General Staff Branch Directors

Facilitator:	Planning Section Chief
Tasks:	Incident Commander • Provides guidance/clarification
	• Provides leadership presence and motivational remarks Safety Officer • Provides a safety briefing Operations Section Chief and Branch Directors • Provide an update on current operations • Provide Operational Briefing for next operational period Planning Section Chief • Set-up briefing area • Facilitates Command and General Staff and attendees briefing responsibilities • Resolves questions • Explains support plans as needed Logistics Section Chief • Briefs transportation, communication, and supply issues Finance/Admin Section Chief • Briefs administrative issues and provides financial report
Outcomes:	The IMT, especially Operations Section Branch Directors, have a clear understanding of the IAP and the incident objectives for the next operational period.

Section D: Organization

D.1 Introduction

The Command, Coordination, and Integrated Communications component of NIMS describes the systems, principles, and structures that provide a standard, national framework for emergency management. Regardless of the size, complexity, or scope of the emergency, effective command, and coordination—using flexible and standard processes and systems—helps safely and efficiently manage the emergency. To ensure that entities with a functional role in emergency management can seamlessly integrate, NIMS encourages common principles, such as terminology, management by objectives, a modular organization, and others to enhance the effectiveness of command, coordination, and communications.

Modular Organization

ICS and Emergency Operations Center (EOC) organizational structures develop in a modular fashion based on an emergency's size, complexity, and hazard environment. Responsibility for establishing and expanding ICS organizations and EOC teams ultimately rests with the IC (or Unified Command (UC)). As emergency complexity or duration increases, organizations expand as the IC / UC, and subordinate supervisors delegate additional functional responsibilities.

The ICS consists of a standard management hierarchical chain of command that expands, and contracts based on the size and needs of emergencies. Through this scalable organization, everyone fulfilling each role has a clear route, if not means, of communications up and down the chain of command and pre-established responsibilities. To maximize resources only positions that are required at the time should be established.

The purpose of this section is to describe the various sections of the ICS organization that could be utilized to respond to an EOP event. This section also outlines the various roles and responsibilities related to the EOP response. This section provides information on:

- Tasks assigned to the five functional areas (Command, Operations, Planning, Logistics and Finance).
- The interrelationship between those functional areas.

ICS Overview

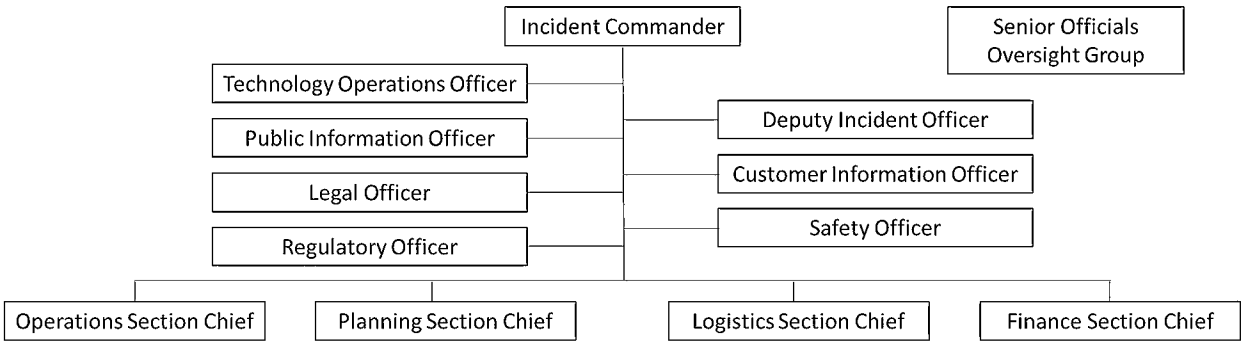
ICS is modular by design and it expands and contracts to fit the incident needs while helping to manage Span of Control (number of resources reporting to any single supervisor). The review of each ICS tool should be deliberate and thoughtful, understanding that ICS is based on a standardized incident management system that has proven to be successful across many disciplines and used across multiple disaster types. Minor modifications are made to fit the mission and resources of the CNP emergency response along with the nature and type of the disaster. Substantial deviation from accepted ICS principles may result in a system that is not recognized by other response partners and could potentially have an adverse impact on the coordination that is necessary during large scale disasters.

Unified Command (UC) UC is an authority structure in which the role of the IC is shared by two or more individuals, each already having authority in a different responding departments. UC is especially helpful for managing events involving multiple departments or business units where the responding organizations and/or areas share responsibility and management for the emergency (Multi-agency Coordination or MAC). If a UC is erected, ICs representing departments or areas that share responsibility for the emergency can manage the emergency response from a single, co-located Incident Command Post.

CNP utilizes the ICS as the baseline for all EOP Response Events. Unified Command may be established at the discretion of the Incident Commander and with the authority of the Senior Oversight Committee/Corporate Response Team (CRPT).

CNP staff members responding to an EOP event are designated as Command Staff or General Staff following the ICS recommended guidelines. The Company's recommended EOP organization of Command Staff and General Staff is below.

CenterPoint Energy Houston Electric EOP ICS Main Structure:



D.1.1 Senior Officials Oversight Group

The Senior Officials Oversight Group or Corporate Response Planning Team, depending on the incident, delegates authority to the Incident Commander. In doing so, they assign the responsibility for all aspects of the restoration effort to the designated Incident Commander. The Senior Official Oversight Group/CRPT has an on-going responsibility to provide policy direction, financial support and strategic direction over the course of the response. They also continuously monitor the situation as an on-going risk assessment to ensure the safety/stability of the company.

D.1.2 Command Staff

Command Staff positions are established to assign responsibility for key activities not specifically identified in the General Staff functional elements. Note that although the Senior Officials Oversight Group is documented on the above ICS Organization Chart, they are not actually a part of Command.

Command Staff positions, a high-level description of their responsibilities and a reference of where to find more detailed information is provided in the table below:

Position	General Responsibilities	Reference
Incident Commander	Provides overall leadership for the incident response, delegates authority to others, establishes incident objectives and directs staff to develop the Incident Action Plan (IAP)	Section D.2.2
Public Information Officer	Interfaces with the public, media, and employees to provide incident-related information. Interfaces with local, state and federal agencies to provide incident-related information and coordinate response efforts	Section D.2.3
Safety Officer	Monitors all safety and environmental procedures	Section D.2.4
Technology Operations Officer	Ensures that systems that are essential for projecting and dealing with a storm's impact are operating in a reliable manner	Section D.2.5

Customer Information Officer	Interfaces directly with customers to gather information and provide incident-related information	Section D.2.6
Regulatory Officer	Provides guidance and discusses regulatory issues impacting the response	Section D.2.7
Legal Officer	Provides guidance and discusses legal issues impacting the response	Section D.2.8

D.1.3 General Staff

General Staff positions are established to assign responsibility for the major functional elements of ICS, including planning, operations, logistics and finance.

General Staff positions, a high-level description of their responsibilities and a reference of where to find more detailed information is provided in the table below:

Position	Responsibilities	Reference
Operations Section Chief	Implements the strategy and tactics and actively pursues the objectives laid out in the Incident Action Plan	Section D.3.2
Planning Section Chief	Ensures the incident response is run in a cohesive and proactive manner	Section D.3.3
Logistics Section Chief	Provides facilities, services and material in support of the incident	Section D.3.4
Finance Section Chief	Coordinates the finance operations for the incident response	Section D.3.5

D.2 Command Staff Section

D.2.1 Summary

The Incident Commander provides overall leadership for the incident response. A Deputy Incident Commander may be assigned as necessary.

The command staff functions are directed by the Incident Commander and are usually responsible for the customer and public information, liaison, safety, legal and technology services aspects of the response. Emergency Operations may also be included in the Command Staff to provide support to response operations. Command staff report directly to the Incident Commander. Command Staff may assign Assistants as necessary.

D.2.2 Incident Commander

Summary

Solely responsible for the emergency effort, including establishing incident objectives and ensuring activities are directed towards accomplishing those objectives. Fulfills role of organizational manager and manages the organization, not the incident.

Responsibilities

The Incident Commander has the following responsibilities:

- Declare activation of the EOP
- Authorize the establishment of the Incident Command Center and identifies the location
- Set the schedule for and conducts periodic briefings and staff meetings with Command and General Staff
- Determine objectives for dealing with the incident
- Authorize the implementation of the IAP
- Help with data or technical assistance needed to support the effort
- Ensure appropriate section chiefs provide plans and reports
- Approve necessary purchases and requests exceeding an established amount
- As necessary, approve the acquisition and release of incident resources
- Approve transfer of command and transition plans
- Reports to the Senior Official Oversight Group, CRPT or other authorities about the status of the incident response
- Approves IAPs

- As necessary, approvals for purchases, acquisition and release of resources and transfer of command and transition plans

D.2.3 Public Information Officer

Summary
The Public Information Officer plays an important role in providing accurate and timely information and projecting the image of incident response before the media, public, governmental officials and employees. The Public Information Officer strives to maintain the company's credibility and reputation. Incident responsibilities include the execution of key decisions and deliverables through advance work preparation, the identification of appropriate communication channels during the event and a robust after-action review to identify areas of plan enhancement.

Responsibilities
The Public Information Officer works directly with the Incident Commander at the Incident Command Center.

The Public Information Officer

- Plans, coordinates, and implements an effective public information program to support the objectives of the IAP through:
  - Media Relations
    - Write news releases with safety tips
    - Conduct and coordinate media interviews and respond to media inquiries
    - Act as primary Company spokesperson and identify subject matter experts most appropriate to speak on behalf of the Company
    - When necessary, hold press conferences with media and local officials
    - Maintain current talking points and FAQs

- Collaborate with legal on approval of all external facing material and mark collateral as appropriate should it be protected
- Monitor social media

- Customer and other external communications
  - Collaborate with Marketing Communication to ensure customer communication channels align with Company position at all stages of event
  - Web updates
  - Inform customer email communication
  - Social media monitoring
  - Power Alert Services (if applicable)
  - Text Notifications
  - Customer bill notifications
  - Advertising support (if applicable)
- Liaison to Customer Service

- Employee communications and documentation
  - Provide real-time updates to employees via email and intranet
  - Direct photography and video needs when necessary
  - Graphics support
  - Assist in setup of storm hotline, if necessary
  - Collaborate with Human Resources to inform on employee assistance needs
  - Collaborate with Corporate Security to inform employees on any security related updates

- Point of Contact for EOCs, Regulatory Agencies and Elected Officials
  - Collaborate with points of contact to maintain listing of all EOC, Regulatory and Elected Officials Liaisons and their assignments
  - Collaborate with members of ICS to monitor incident operations and provide guidance and support to Liaisons as needed
  - Provides real-time information to Liaisons who act as the point of contact for Federal, State and local government representatives, keeping supporting officials aware of the incident status
  - Stays aware of all changes in emergency project operations, policies and plans in order to provide the most current and accurate information
  - Provides information to emergency project personnel, headquarters personnel, industry representatives, elected officials, regulatory agency personnel and others, as necessary
  - Provides training, guidance and talking points as needed, to government liaisons on proper procedures for dealing with the media and onsite customer interests which may impede the work of operations
  - Coordinates and assist emergency project personnel when it is necessary or desirable for them to be interviewed by the media
  - Collects and disseminates information regarding the status of CNP's system(s) to elected officials, regulatory agencies, and emergency management personnel.
- Community Outreach and Humanitarian Assistance Efforts
  - Assess the need for community support and Company's ability to assist, either directly or through the financial contributions to third-party agencies
  - Collaborate with CenterPoint Energy Foundation, and its Board as necessary, to identify available funds for community assistance if appropriate
  - Collaborate with Community Relations to identify opportunities for volunteer, food, basic necessity assistance, as appropriate

- After-Action Review
  - At the conclusion of the incident, and in coordination with the ICS and the CRPT, participate in a thorough after-action review to identify areas of plan enhancement
  - Complete necessary updates/training with impacted functions to ensure alignment on plan enhancements identified
  - Update any policies and procedures as a result of the conclusions obtained in the after-action review

D.2.4 Safety Officer

Role
The Safety Officer monitors incident operations and advises the Incident Commander on all matters relating to operational safety, including the health and safety of CNP EOP personnel.

Responsibilities
The Safety Officer works directly with the Incident Commander at the Incident Command Center.

The Safety Officer has the following responsibilities:

- Addresses all work safety issues and accidents or incidents for the Company and visiting utility and contract crews
- Interfaces between the Company and Safety personnel of visiting utility and contract crews
- Interfaces with state and federal safety entities as the need arises
- Coordinates safety orientations for all mutual assistance crews and all Contract crews before they are allowed to begin working on the CNP system
- Conducts daily safety briefings with internal and external Safety Representatives

- Conducts jobsite inspections of internal and external crews to ensure that safety rules are being followed and good work practices are being used

D.2.5 Technology Operations Officer

Role

The Information Technology Officer provides the most reliable processing of storm-essential and storm-contingent systems to ensure the primary goal of the EOP is met as expeditiously as possible.

Responsibilities

The Information Technology Officer works directly with the Incident Commander at the Incident Command Center.

The Technology Operations Officer has the following responsibilities:

- Conduct pre-storm planning activities to identify critical and contingent systems that must be maintained during an incident
- Develop a structure to support the various systems and functions on a 24-hours basis
- Provide support for the following:
  - Customer Information System
  - Outage Management System, Advanced Distribution Management System and Graphical Switching
  - Enterprise Mobile Data
  - EAI
  - Batch scheduling and mainframe automation
  - Data security
  - Change management
  - Mainframe operations
  - Help desk services (including Desktop Support)

- LAN services
- UNIX services
- Telecommunications and networks
- Digital Design Studio engineering and tools
- Database management
- SAP applications, SAP Basis and databases
- Smart Grid
- Other systems

D.2.6 Customer Information Officer

Role

The Customer Information Officer is the Incident Command's point of contact for members of the public to get information on estimated restoration times and other incident-related matters and to report incident-related information, such as downed power lines.

Responsibilities
The Customer Information Officer works directly with the Incident Commander at the Incident Command Center.

The Customer Information Officer has the following responsibilities:

- Establish and manage all aspects of the telephone call center operations
- Notify Information Systems about when to implement the "Storm Access" Security Profile to allow limited access to anyone called upon to answer customer calls
- If required, request additional resources to handle call volumes
- If needed, activate a third-party High Volume Call Answering System (HVCA) that can handle the maximum number of calls received
- Enter information from customers into the Customer Information System

D.2.7 Regulatory Officer Role

The Regulatory Officer provides guidance and discusses regulatory issues impacting the response.

Responsibilities

- Reviews regulatory requests and directives and support compliance
- Acts as a point of contact for Incident Command regarding regulatory matters
- Establishes appropriate regulatory staffing required to support the incident
- Attends Planning Meetings and is prepared to discuss regulatory issues impacting the response
- Assists with resolving regulatory issues as needed
- Coordinates with Public Information Officer and Regulatory, Government Liaison (Director, Government Policy) on communications with regulatory agencies, public officials, and others
- Provides other regulatory advice, counseling, and guidance as necessary

D.2.8 Legal Officer Role

The Legal Officer provides guidance and discusses legal issues impacting the response.

Responsibilities

- Review authorities and legal directives and ensures compliance
- Acts as a point of contact for Incident Command regarding legal matters
- Establishes appropriate legal staffing required to support the incident
- Attends Planning Meetings and is prepared to discuss legal issues impacting the response
- Reviews and documents Command's legal decisions and directives
- Review agreements and contracts and assists with resolving legal issues as needed
- Helps resolve labor issues

- Review various communications
- Reviews all plans and documentation to ensure compliance with legal mandates
- Works with Claims team to investigate and process third party general liability, auto, and other claims and incidents with potential to become claims or litigation
- Respond to litigation as needed
- Provides other legal advice, counseling, and guidance as necessary

D.3 General Staff Sections

D.3.1 Summary

The General Staff represents and is responsible for the functional aspects of the Incident Command Structure. The Incident Commander activates the Command staff and the other four major functional areas (Sections):

- Operations
- Planning
- Logistics
- Finance

Staffing throughout the Incident Command structure has been pre-determined, reviewed, approved and updated throughout the year as needed, and is maintained through the ESR. However, The Incident Commander has the authority to make additions or reductions to the structure/staffing pending the needs of the response to the event.

D.3.2 Operations Section

The Operations Section identifies, assigns and supervises the resources needed to accomplish the incident objectives.

D.3.2.1.1 Major Underground Summary

Major Underground is responsible for assessing and restoring all 3-phase major underground facilities and reporting on their status. They may also assist with restoration of distribution residential underground (URD) facilities.

Staffing

- Director
- Operations managers, who are responsible for leading the restoration efforts
- Underground restoration personnel (at the Harrisburg Service Center)
- Overhead contract crews, as needed

Inputs

- Information on damaged Major Underground facilities (from SCADA)
- Customer reports through key accounts or customer service
- Information on which Underground Residential Distribution (URD) locating vans with operators and EZ haulers have been delivered to the Harrisburg service center (from Service Centers)
- Information on overhead restoration progress (from Distribution Operations)
- Priority restoration information (from Priority Calls Hot Desk or daily conference calls)
- Premise registry data to help prioritize response effort
- Trouble orders (from Mobile Data)

Tasks

- Inspect key account underground facilities for damage

- Assign and handle trouble orders for Major Underground facilities and residential URD facilities
- Establish the Underground Evaluation Center (at the Harrisburg service center)
- Make sure the Underground Evaluation Center is in contact with other evaluation centers

Outputs

- Daily progress reports (for the Incident Command Center)
- Reports concerning any environmental events (to the Environmental branch of Safety)

D.3.2.1.2 Priority Calls Hot Desk

Summary

The responsibility of the Priority Calls Hot Desk is to receive, document, and track requests from SOC, government liaisons, and internal CNP sources. These requests cover:

- Life safety
- Mobility
- Security
- Environmental
- Other situations

These situations may require an urgent response and resolution, and a follow-up report to inform the Incident Commander and Section Chiefs.

Staffing

Priority Calls Support, depending on the number of shifts

Inputs

- Situation notifications from SOC
- Situation notifications from Government Liaisons
- Situation notification calls transferred from customer service and internal CNP sources
- Information from the Incident Commander and section chiefs on which priority restorations should be performed first (such as decisions to give a higher priority to building supply stores, gas stations, and grocery stores)
- Prioritized list of key account customer outages (from Key Accounts)

Tasks

- Receive new calls from SOC and internal resources, and log the call information into the SharePoint site
- Create a prioritized, daily report of requests
- Receive information on jobs that are completed in the field, and log information into the SharePoint site to close out jobs
- Monitor open jobs for updates and estimated on times
- Create trouble orders in CIS based on direction from Incident Commander

Outputs

- SharePoint information that users can use to check the status of all priority jobs Users will be restricted to sort and view-only access
- Requests for damage estimates (to Primary Metering and Central Metering)
- Prioritized list of restorations requests submitted to Operations branch director
- Status updates to Operations Branch Director and others as needed
- Priority calls (to Service Centers)

D.3.2.2 Transmission and Substation Branch

D.3.2.2.1 Transmission Operations

Summary

Transmission is responsible for:

- Patrolling and identifying damage to Transmission facilities
- Repairing damaged facilities

Staffing

- Transmission Evaluation Center managers
- Helicopter Patrol (10)
- Transmission Restoration Center manager
- Transmission Restoration Center manager administrative assistant
- Engineering personnel
- Material personnel
- Transmission Restoration Center manager
- Outage Coordinator
- Crew Leaders
- Facilities Coordinator
- Ground Patrol
- Contractor Services
- Foreign Crew Coordinators
- Support personnel

Inputs

- Information on circuits that had an outage, either by lockout or instantaneous f
- operation (from RTO)
- Prioritization information for circuits (from RTO)
- Fault recording information (primary from TWS system or calculated faults)
- Which contract/mutual assistance resources will be coming available (from Resource Acquisition)

Tasks

- Compile and evaluating inspection patrol information
- Generate and modify projected restoration dates, based on available crews and materials
- Help with other parts of the restoration process once Transmission facilities have been repaired
- Repair PCS equipment

Outputs

- Daily status reports, including estimated dates for restoration (for the section chief, through the Transmission and Substation Evaluation Center)
- Information on additional crews that are needed or are ready for demobilization (for Resource Acquisition)
- Operational transmission facilities

D 3.2.2.2 RTO

Summary

CNP's Real Time Operations (RTO) is responsible for:

- Monitoring and controlling the switching of transmission lines, substation breakers and distribution breakers (through SCADA, switching orders, clearances, and work tags)
- Coordinating the efforts of various groups (primarily Transmission and Substation) in restoring the Bulk Electric System (BES)
- Providing updates on the status of BES

Staffing

RTO is staffed 24/7 during EOP, with:

- Branch manager (Real Time Operations Director)
- Manager of System Operations
- System Operations Supervisors
- System Controllers
- RTO Support Staff

Inputs

- Requests to have circuits energized/de-energized (from Distribution Control)
- Status of Control Systems' computer systems and communications (from Control Systems)
- Information on the status of the ERCOT system (from ERCOT)
- Weather information (from StormGeo)
- Damage assessments and restoration updates (Transmission, Substation, and Distribution Control)

- Priority call information (from Priority Calls Hot Desk and government liaisons)
- SCADA viability assessments (from Substation)
- Reports of customer statuses (from Transmission Accounts, through the Transmission and Substation Evaluation Centers)
- Lists of Customer Priorities (from Transmission Accounts, through the Transmission and Substation Evaluation Centers)
- Information from various other external sources

Tasks

- Communicate with the following groups as appropriate:
  - Customer Service
  - Corporate Communications
  - Regulatory
  - Substation Performance
  - Transmission Operations
  - Facilities O&M
  - Telecommunications
  - Distribution Control
  - Transmission Accounts
  - Key Accounts
  - Incident command staff
  - Control Systems
- Control all equipment in the BES (by either SCADA or by the issuing of switching orders), including the switching of distribution breakers

- Alert Substation Field Operations when they need to monitor substation equipment if monitoring equipment is not available
- Work with Transmission & Key Accounts and Resources to identify which load and generation facilities may need to be shut down.
- Under the threat of a hurricane or other event that causes a major loss of generation and/or load, evaluate the North Transfer Limits and status of Generation Resources inside CNP's footprint. This comes with the anticipation of exporting energy to the north. The goal of this effort is to prevent islanding or a Blackout condition by supporting the minimum load requirements of generation resources if major loads and/or tie lines are lost.
- Assist with prioritizing restoration
- Synchronize islands if island conditions exist
- Monitor and react to the status of the BES
- Answer Transmission Accounts' enquiries pertaining to the status of Industrial Customers' substations

Outputs

- Authorize requests for feeders to be energized (for Distribution Control)
- Switching orders, clearances, and work tags (for Substation and Transmission)
- Information on the status of the BES, including load (for Electric Market Operations - "EMO")
- Periodic communications about the position and intensity of the storm to CNP personnel, using email and text messaging systems
- Directions to Substation Field Operations personnel
- Inform Distribution Control on any events that are adversely affecting distribution operations, including operations and lockouts
- Update the Outage Reporting System with circuit information

3.2.2.3 Substation Operations

Summary

Substation is responsible for verifying and ensuring the operability of the bulk power grid (with RTO) through:

- Rapidly assessing damage to Substation facilities
- Making necessary repairs to Substation facilities so that those facilities are operating on at least a basic level
- Preparing Substation facilities for re-energization
- Manually operating Substations as directed by RTO

Staffing

- Engineering personnel
- Substation staff (initially at EC/DC, afterwards throughout the service territory):
    - Substation Operations director
    - Substation Operations managers
    - Substation crew leaders (with crews)
    - Outage Coordinators
    - Construction Coordinators
    - SCADA specialists
    - EVAL coordinators
    - EVAL outage monitor
    - EVAL data trackers
- Bargaining Unit field personnel across the CNP system to address core responsibilities
- Engineering personnel (for tasks such as relaying, and handling transformers)

- Non-electrical contractors (such as those who work on cranes or barges, or are specialty movers) for emergency restoration

Inputs

- Equipment and personnel required to perform aerial assessments (conducted in conjunction with Transmission)
- Priority restoration information (from Transmission and the Distribution Evaluation Center)
- Information on which breakers and switches Substation needs to operation manually (from RTO [or Distribution Control])
- Availability of Substation staff
- Status of storm, including information on when it is safe to fly and accessibility to facilities (from RTO)
- Information on accessibility to facilities (from law enforcement)
- Ability to communicate across the system
- Engineering support during the storm
- Work tags (from RTO)

Tasks

Pre-storm

- Prepare Substation facilities to weather the storm, including:
- Making sure the facilities have sufficient backup power
- Removing any debris
- Ensure that Substation has sufficient, operating tools and equipment to begin a successful restoration
- Make sure needed documents are secured
- Transport equipment as needed

- Test Grant substation flood gates and pumps
- Remove Tiki Island mobile substation and transport to the South Houston Complex
- Move standby generator and fuel tank to Morgan's point
- Review synchronization and black plant startup procedures with employees
- Place Crosby and Bellaire "SVC" units into manual mode
- Change Cyber Key reset days to 14

Restoration

- Ensure the safety of the work environment
- Report locked out transmission and distribution circuits
- Manually operate breakers and switches as directed
- Perform detailed inspections of damaged Substation facilities where possible
- Conduct aerial assessments of Substation facilities
- Coordinate contractor services as required
- Ensure that work is performed safely
- Repair equipment
- Release resources to help with other areas of restoration work once Substation facilities have been repaired

Outputs

- Substation availability, operability, and damage assessments (for the Transmission, Distribution, and Substation Evaluation Centers, and RTO)
- SCADA viability assessments (for RTO, through Control Systems)
- Substation loading assessments (if SCADA is not available)
- Equipment and material requests (for Supply Chain)

- Various requests to Shops and Facilities
- Ad-hoc reports for command staff as requested
- Functional substation facilities

Vegetation Management Branch
Staffing

- Branch Director
- Vegetation Management Manager - The Manager is initially embedded in the Resource Acquisition group to support appropriate resource procurement. Once resources are acquired, the Manager will support the Branch Manager in operations restoration. When resources are demobilized, the Manager moves back to Resource Acquisition to aid in demobilization.
- System Foresters - System foresters have dual reporting responsibilities through both the Service Area Directors and the Vegetation Management Manager. They also will also facilitate resolution of VM issues for service area and staging site crews, SCCs, TCCs, customers, and resource constraints as identified.
- Transmission Foresters - Transmission Foresters will coordinate local tree crew service restoration in support of Transmission Operations. Upon completion of transmission system restoration they will act as ad hoc System Foresters in special need areas.
- Vegetation Management Spokesperson (Bellaire & surrounding high profile areas)
- Service Area Tree Crew Coordinators (SCC) (reporting through the Service Area Directors) - The SCCs are assigned to each service center to coordinate local tree crews in support of CNP line crews.
- Tree Crew Coordinators (TCC) - The TCCs are assigned to the staging sites to assist in administration and coordination of foreign tree crews. The TCCs and foreign tree crews will be matched with an FCC and line crews in support of operational objectives as defined by the Service Areas Operations (i.e. Staging Site) Manager. (Desired staffing – about 1 TCC / 7-10 foreign tree crews)

Inputs

- The number of stages sites that will be opened, and when they will be opened (Operations Section Chief)
- The number of resources that will be arriving on the system, and when they will be arriving (from Resource Acquisition)
- Contact information for Service Area Directors, Operations Managers, contractor management, FCCs, SCCs and TCCs
- ICS reporting structure
- Information on available specialized equipment (local and foreign) (from Resource Acquisition)
- Special Vegetation Management objectives (from Operations Section Chief)
- Special tree crew resource needs from HR to support the Employee Assistance branch (tree removals and minor roof repairs)
- Reports or updates from System Foresters

Tasks

- Identify total manpower resources for Vegetation Management, and the time frame for those resources.
- Support the allocation of Vegetation Management resources across staging sites, service centers and Employee Assistance Program.
- Handle mobilization and demobilization of internal and external Vegetation Management resources.
- Specialized global or tactical VM issues resolution as identified during the course of the event.

Outputs

- Requests for specialized equipment (to Resource Acquisition)

- Daily reports for conference calls (to Operations Section Chief)
- Communications concerning Vegetation Management's responses to special Vegetation Management (to Operations Section chief, Resource Acquisition, and other groups that are working on high-priority work that Vegetation Management work is involved with).
- Guidance and feedback to VM Branch Staffing to support foresters' activities.

D.3.2.3 Grid & Market Operations Branch

D.3.2.3.1 Analytics Summary

Analytics is responsible for:

- Providing daily operations support of Situational Awareness (SAGD) for Operations, Telecommunications, IGSD devices and the Security Operations Center (SOC)
- Monitoring all aspects of SAGD and its' supporting systems to ensure timely delivery of
- information essential to support restoration efforts
- Ensuring availability of systems relying on Mobile Data and the ADMS once those systems are reactivated

Staffing

- Analytics Manager (Storm Rider at EC/DC)
- 3 Architects (Day One Responders at EC/DC), two to support Business Warehouse and one to support SAGD and Streams Real time interfaces
- Business Analysts (Day One Responders at CNP Tower if open)

Inputs

- ADMS is operating
- Mobile Data is operating
- DCE is operating
- MDM is operating
- As needed, support resources from Technology Operations including:
  - Database Administrators
  - Network Resources specializing in the telecommunications operation

Tasks

For Operations, Telecommunications, IGSD devices and the SOC:

- Maintain and monitor supporting computer systems (including Business Warehouse) and situational awareness graphical displays
- Availability to fail systems over to the new AOC when available

Outputs

- Effective and functioning systems and situational awareness graphical displays supporting the restoration efforts for Operations, Telecommunications, IGSD devices and the SOC
- Availability to fail systems over to the AOC

D.3.2.3.2 Distribution Control

Summary

Distribution Control is responsible for:

- Providing safe and reliable switching
- Overseeing daily operation of the Distribution grid
- Monitoring all radio communications between field operations and the control room
- Ensuring availability of the Mobile Data system when it is reactivated

Staffing

- Manager of Distribution Control (at EC/DC)

- Control room operation lead (at EC/DC), leading:
  - Regional supervisors (at EC/DC)
  - Floor controllers (at EC/DC, reporting to supervisors)
  - Distribution Controllers (engineers) (at EC/DC)
- ADMS operation lead, leading:
  - Distribution Control Support (technical analysts) (at EC/DC)
  - Mobile Data support (at Service Centers)
  -

Inputs

For control room operations:

- Switching requests (from FCCs, crew leaders, or RTO at Service Centers)
- Prioritization information from the Priority Calls Hot Desk

Tasks

- Execute switching orders as requested
- Maintain and monitor supporting computer systems, dedicated phone lines, and situational awareness graphical displays for DVAL
- Set up equipment required by the Priority Calls Hot Desk
- Communicate distribution operations information to RTO (for opening and closing breakers)
- Manage SOC requests, including:
  - Acting as liaison with SOC to take requests and provide status updates
  - Dispatching field operations personnel to the requested location

Outputs

- Safe and effective switching, including communication concerning actions taken in the field

D3.2.3.3 EMO Summary

EMO is responsible for:

- When any bank in the system cannot transfer funds electronically, communicating with banks and Retail Electric Providers (REPs) to make sure that everyone is clear on how TDSP invoices are going to be paid to CNP
- Notifying the Texas retail market about CNP's EOP plans, and how those market participants will be affected
- Rebuilding data (and synchronizing it with the Texas retail market) after an event as needed

Staffing

- Branch manager
- ERCOT contact manager
- ERCOT manager support staff
- AMS retail market staff
- Competitive retailer communications staff

Inputs

- Which Technology Operations (TO) systems are working, and which are not (along with estimates of when those systems will be restored) (from TO)
- How much load is on the system (RTO)
- Overlay map that details outages by GLN number, and their estimated duration (GIS)
- Forecast of the load that will be on the system the next day
- Notification of demobilization of EMO resources assigned to Distribution (Resource Unit)
- Notification of ad hoc requests including from state regulatory bodies (from government liaison)

- Information on status of BES, load (from RTO)
- Status of AMS data (from AMS)

Tasks

- Upon the designation of force majeure, work with AMS Systems personnel to change a configuration in the MDM thereby allowing readings for switches to be estimated by the MDM.
- Review TMH and CIS exceptions on an ongoing basis, and make corrections as needed
- Write notifications to send to Texas retail market (at least 3 times daily)
- Respond to requests from the retail market
- Validate the status of premises that need to be retired from the ERCOT system
- Enter configurations to stop late charges for REPs whose banks and/or systems are inoperable
- Ensure that the Texas market is as functional as possible without our input (i.e., certification of new REPs)
- Set up retail market conference calls
- Prepare presentations for ERCOT committees and sub-committees as part of the after-action review process
- Releasing EMO resources to the call center as appropriate

Outputs

- Report to PUCT of plans to restore market orders
- Notifications on how the Storm EOP is affecting market orders, system functionality, and customer outages (to Texas retail market)
- Signed certification record for REPs for ERCOT
- Ad hoc reports to regulatory bodies and REPs as requested

- Calls to retail market to provide status updates
- Presentations for ERCOT committees and sub-committees
- EMO resources for call center

D.3.2.4 Gas Liaison Branch Summary

The Gas Liaison is responsible for keeping the Electric side of the business informed as to the status of Gas operations restoration.

Staffing

Gas Liaisons (both at the Incident Command Center at Greenspoint)

Inputs

- Gas restoration information (such as outages, mutual assistance requests, and internal staff that are coming in from other regions) from daily conference calls
- Ad hoc requests for updates and reports
- Priority calls for gas restoration work
- Requests for additional resources (after the gas system has been secured)

Tasks

- Monitor the status of restoration efforts, including outages and staff augmentation
- Respond to requests for additional resources

Outputs

- Requests to gas field operations to check on the status of specific gas facility restoration work

- Communications back to requestors as to the status of specific gas facility restoration work
- Gas resources for helping on the Electric side of the business

D.3.3 Planning Section

D.3.3.1 Summary

The Planning Section collects, evaluates and disseminates incident situation information and intelligence to the Incident Commander and incident management personnel. This Section then prepares status reports, displays situation information, maintains the status of resources assigned to the incident and prepares and documents the IAP, based on Operations Section input and guidance from the IC. This Section is also responsible for securing any necessary outside resources (e.g. line skills, tree trimming) that are necessary to support incident response.

D.3.3.1 Situation Planning Branch Summary

Situation Planning is responsible for gathering needed information to prepare the needed daily Incident Action Plans during an event.

Method of work

- Incident Action Plans are prepared a day in advance.
- Example: Situation Planners working on Thursday are preparing the Incident Action Plan for Friday.

Staffing

- Branch manager at the Incident Command Center in Greenspoint
- Situation Planners placed at different parts of the service territory as follows:
  - 4 at EC/DC (1 for Distribution Operations, 2 at Transmission Substation, and 1 at Dispatching)
  - 1 at Transmission Restoration center in South Houston
  - 1 at Major Underground in Harrisburg Service Center
  - 3 at the Incident Command Center in Greenspoint

Inputs

Information for the incident action plans, including:

- A variety of ICS forms
- Maps from GIS
- Weather reports from DCC

Tasks

Coordinate among the various groups (see Staffing section above) to gather the information needed to create the daily incident action plans

Outputs

- Daily incident action plans
- Prioritized request of Telecom's restoration needs (from Telecommunications Services)
- Output of the current Hurricane Ike model (from Status Documentation)
- Notification on changes that need to be made to meet current restoration goals (from Status Documentation)

D.3.3.2 Resource Acquisition Branch Summary

The Resource Acquisition Branch is responsible for:

- Compiling a listing of available resources and finalizing contracts for distribution line skill, tree skill, and transmission line skill that can help with storm restoration by June 1st each year
- Creating a roster of available resources including their capabilities and equipment
- Activating contractors and mutual assistance crews as required

Staffing

- Branch Director of Resource Acquisition
- Contractor Acquisition manager

- Mutual Assistance Acquisition manager
- Acquirement Data manager

During the course of an event, there is a significant level of effort in the beginning and end stages. Therefore, during the course of an event, some of these resources may be temporarily reassigned to other roles.

- Resource Acquisition Group staff
- Resource Acquisition Support staff
- Liaisons – Inspection, Transmission, and Tree resources

Inputs

- Receive human resource requirements from operations and support areas
- Contractor storm rosters, including skills and equipment inventory and contact information from contractors
- Initial staging site location and staffing requirements (from Operations)
- Signed contracts (from selected contractors)
- Timesheet information entered into ESR by Staging Site Support staff
- Contact information for check-in coordinators at each staging site (from Resource Unit)
- Instructions on the demobilization of resources (from Operations)
- Information on whether or not crews are being dispatched to another event (from foreign crew leadership)
- Requests for specialized equipment (from Vegetation Management)
- Communications concerning Vegetation Management's responses to special Vegetation Management (from Vegetation Management)

Tasks

Pre-storm season

- Compile a listing of line and tree trimming contractors capable of supplying resources for storm restoration. The details on the contractors prior to activation will include:
    - Contractor name
    - Contact name for contractor
    - Union/non-union status
    - Address
    - Contact number and email address
    - Vendor number and contract number
    - Execute business agreements with selected contractors by June 1st of each year (Supply Chain). This will expedite emergency activations.

Pre-storm

- Upon activation of the Storm EOP to a Category I, Alert THREE, alert the contractors that they may be activated and validate availability of their resources and equipment.

Based upon the restoration plan authorized by the Operations Section Chief, some contractors will be authorized to begin movement to Houston prior to storm arrival. Other contractors may be flown in to integrate with Company crews, while some may be notified after additional assessment of system damage.

- Enter crew roster data into ESR

Restoration

- Verify that timesheet data is entered into ESR daily for contractor resources
- Enter crew roster data and estimated and actual arrival dates into ESR
- Prepare daily reports summarizing resources, and their statuses
- Direct all contract crews with vehicles to an assigned staging site.

These crews may later be re-directed to other staging sites if they are needed more elsewhere.

- Help to resolve exceptions (examples: crews show up at the wrong site, crews that do not show up, crews that are not cleared for participation in EOP)
- Prepare and continuously loading backup database for reporting

Demobilization

- Notify foreign crew leaders that they are being sent home
- Notify contractor contact that crews are being demobilized
- Issue and mail letters of thanks to demobilized crews
- Update ESR with demobilization dates for foreign crews
- Communicate with staging site management about the demobilization of crews

Post-storm

- Assist with the validation and payment of contractor invoices
- Lead effort to rank and review contract resources
- Assist with rate filing and related audits

Outputs

- Daily reports summarizing resources, and their statuses
- Updated ESR data for contract resources

D.3.3.3 Resource Unit Branch Summary

The Resource Unit branch is responsible for:

- Tracking of all resources (internal and external)
- Onboarding/offboarding contract and mutual assistance resources. In order to achieve these objectives, this branch is divided into 2 groups:
  - Resource Management
  - Resource Reporting

Staffing

- Resource unit branch director (Greenspoint Incident Command Center)
- Resource management:
  - 1 resource management manager (Greenspoint Incident Command Center)
  - 4 check-in supervisors (initially at the Greenspoint Incident Command Center, then assigned on day 2 to their respective staging sites)
  - 56 check-in coordinators (at staging sites)
- Resource Reporting:
  - 1 resource reporting manager (EC/DC)
  - 11 resource database coordinators (EC/DC)

Inputs

Both groups:

- The number of contract/mutual assistance crews that are being assigned (Resource Acquisition)
- The schedule of the arrival of mutual assistance support (Resource Acquisition)
- Where the crews are being initially assigned (Resource Acquisition)
- Badges and decals (from Security)

Resource Management

- Badges for foreign and mutual assistance crews (from Security)
- CNP decals for foreign and mutual assistance crews and their vehicles

Resource reporting

- Check-in and check-out sheets from Resource Management group
- Receive requests for internal resources for EOP duty
- Receive resource re-assignment information

- Receive information on released resources from EOP duty
- Information in Employee Storm Roster
- Information on staff augmentation from operating areas Examples: GIS, Underground Locating

Tasks

Resource Management:

- Check-in:
  - Validate roster of personnel and equipment, and make adjustments as required and authorized.
  - Verify license plate information provided on the rosters or record the license plate and issuing state for all vehicles and trailers, if not provided on the roster (in support of the Tool Road procedures, see page 10, Section A.1.5.1)
  - 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
  - Issue badges, fueling cards, and parking instructions
  - If available, enable GPS tracking of authorized vehicles
  - Make sure they go through the safety training and get handed off to the hotel coordination branch
  - Ensure that the mutual assistance/contract crews understand the check-out process
  - Re-route unexpected crews to appropriate site if required
- Check-out:
  - Ensure laundry has been picked up
  - Collect ID badges
  - Provide any additional logistical support required for departure
  - Log time departed in the EOP resource database (SharePoint)
  - If needed, disable GPS tracking of vehicles

- Other duties as assigned, as long as they stay on the staging site
- Receive demobilization information from Operations and Resource Acquisition (at least 24-hours in advance of demobilization, when possible)

Resource Reporting:

- Update EOP resource database (SharePoint)
- Run daily reports and ad-hoc reports
- Aligning requests for internal resources with internal resource availability
- Receive demobilization information from Operations and Resource Acquisition (at least 24-hours in advance of demobilization, when that is possible)

Outputs

Resource Management:

- Check-in:
  - Resource updates to the Resource Acquisition group
  - Completed check-in list for each contract and mutual assistance group
  - Lists of license plate information and issuing state for all non-CNP vehicles and trailers to the Security Branch Check-out
  - Resource updates to the Resource Acquisition group
  - Completed check-out list for each contract and mutual assistance group

Resource Reporting:

- Based on information from Resource Management group, updates for the EOP database, with any roster changes, equipment adjustments, or check-in/check-out information.

- Standard daily EOP resource report to Operations
- Daily resource availability reports
- Ad-hoc resource reports
- Contact information for check-in coordinators at each staging site (for Resource Acquisition)

D.3.3.4 GIS Resources Branch

This GIS resources branch is responsible for:

- Providing analysis, reporting, maps and applications to aid in damage assessment, restoration and communication internally and externally
- Helping with damage assessment as needed

Staffing

- Branch director (at the Incident Command Center)
- Manager (at DVAL)
- GIS Support - core GIS staff at the CNP tower to ensure integrity of system infrastructure, map and map copy production, data analysis and special requests
- GIS Support - developers at CNP tower for advanced GIS work such as complex analyses and processing of orthoimagery
- GIS Support – reassigned to the field for damage assessment and other EOP roles/activities
- GIS Support - to be located at Services Centers for GIS analysis and/or other support activities (includes specific assignments at EC/DC and Harrisburg at a minimum).

Inputs

Outage and restoration data from OAS in the short term, and

- Outage data from ADMS in the near future, and restoration data from replacement system to be named (by substation area, circuit, and circuit sections)
- Requirements for ad-hoc mapping and reporting requests

Tasks

- Produce maps, reports and analyses
- Maintain the hardware and applications for GIS
- Ensure that Outage Tracker is populated with outage and restoration data, and provide comparison and analyses of said data
- Provide various routine as well as ad-hoc reports

Outputs

- Additional 11" x 17" facility maps upon request for use as patrol maps or storm restoration tracking maps
- The availability of all maps required for inspection and documentation of circuits assigned to each Service Area, for field patrol use. Maps shall be of sufficient size and detail to allow field patrols to follow un-fused feeder main (backbone) and fused laterals.
- Web-based Outage Tracker application specifically designed to capture and display outages and estimated restoration dates for internal and external consumption. This application will have total failover capabilities should the equipment fail or if power is lost to the CNP Tower.
- Updated GIS information based on as builts received from field crews (post event)
- Ad-hoc reports as requested
- Web service feeds to DOE

D.3.4 Logistics Section

D.3.4.1 Introduction

The Logistics Section is responsible for all service support requirements needed to facilitate effective and efficient incident management, including: meals, lodging, facilities, laundry and miscellaneous resource needs. The organization is made up of a combination of CNP employees and select contractors.

D.3.4.2 Logistics Resources Branch

The Logistics Resource Branch is comprised of three distinct groups, each with its own function. These groups are Hotel Coordination, Supply Chain and Staging Site Resources. Each is discussed in detail below.

3.4.2 1. Hotel Coordination Summary

Hotel Coordination is responsible for:

- Providing mutual assistance support as CNP crews travel to and from disaster areas (for mutual assistance events outside CNP's territory)
- Providing lodging assistance to CNP employees and retirees, incoming line crews and tree crews, and other support personnel as needed. (For disaster recovery within CNP's territory)

Staffing

- Hotel Coordination manager
- Hotel coordinators, including:
  - 4 geographic leads
  - 1 employee lead
  - 1 contracts lead
  - 1 resource acquisition liaison
- Hotel coordinators (the number depends on the size of the event)

Inputs

- Information on mutual assistance and contractor crews (number, gender, supervision, support), when lodging is needed and expected duration, and where

they will initially be stationed (from Resource Acquisition or utility requesting assistance)

- Hotel availability assessment (external 3rd-party and local information), including:
  - If the hotel is operational
  - If the hotel has limited operations (due to a power outage or flooding, for example)
  - The number and types of rooms the hotel has available
- Approved lodging options in addition to hotel availability (from Incident Commander)
- Hotel Coordination staff requirements for each staging site (from Operations)
- Notifications when resources shift in the territory (from Resource Unit)
- Notifications regarding resource demobilization (from Operations)
- Contact information for foreign crew leadership (from Resource Acquisition)

Tasks

General Hotel Coordination activities:

- Verify that Hotel Coordination has received needed information from Resource Acquisition
- Disseminate information (mainly contracts and staging sites that are affected) from Resource Acquisition to hotel coordinators
- Acquire contracts with hotels
- Provide contracted rooms and hotel names to appropriate hotel geographic leads
- Match room inventory with incoming crews, and making pre-arrival assignments
- Communicate assignments to group hotel liaisons
- Ensure that keys are ready before crews arrive

- Validate that the rooms that hotels provide match what they contracted with us for
- Provide the hotels with appropriate contact information and the CNP check-in process
- Complete daily reconciliation and problem resolution with hotels
- Coordinate check out process with hotels
- Coordinate hotel payments with Finance (by credit card or invoice)
- Enter required information into ESR
- Accurately complete daily forms 1-5 and issue log
- Participate in conference calls as needed Staging site

Hotel Coordinators

- Verify that crews that need hotels have received their badges
- Check in crews for room inventory and finalize hotel assignment
- Complete roster form and have crew lead sign it (this becomes the crew's check in authorization at the hotel)
- Communicate with busing about needs for crew transportation and hotel assignments
- Determine bus driver lodging needs, and assign rooms for drivers
- Handle any lodging issues
- Relocate crews when needed
- Assist with crew check out process

Outputs

- Where crews will be housed (for Staging Site Logistics)

- Rosters for hotels
- Busing needs (to Staging Site Logistics)
- Management reporting as requested
- Contract documentation
- Completed forms and logs

Supply Chain

Summary

Supply Chain has EOP responsibility to evaluate, plan, and execute the procurement, management, and delivery of restoration material to CNP and mutual assistance crews.

Staffing

Internal staffing:

- Manager
- Logistics leads
- Purchasing lead
- Material coordinator
- Materials management handlers
- Material handlers
- Purchasing storm team

Staff augmentation (depends on the size of the event):

Material handlers from:

- Employee storm roster
- Mutual assistance
- Contractors

- Trucking support

Inputs

- Official declaration of EOP (from Incident Commander)
- Current inventory levels from SAP
- Information on facility status from EOP briefing conference calls
- Information on incoming internal and external crews (from Resource Acquisition)
- When and where staging sites are opening (from Operations)
- Requests from Substation, Transmission, and Major Underground

Tasks

Pre-storm season:

- On an annual basis, evaluate and execute adjustments to the Central inventory in preparation for storm season.
- Prepare contracts for EOP services such as line skills, logistical needs, and vegetation management
- Update the Special Material Release with Engineering to ensure that the appropriate materials are included and updated
- Ensure that Staging Site Kits are complete, and re-stock them as needed

Pre-storm preparation:

- Pre-pack 5 Service Center Storm Kits and strategically pre-position them year round at selected Service Center locations.
- Pre-position approximately 7 Staging Site Kits for quick access prior to the hurricane season, and ship them to staging sites as directed.

- Once EOP has been declared, place the initial Special Material release at minus 6 hours to landfall.

Restoration:

- Manage logistics operations at the Service Centers, material depots, and staging sites with timely material replenishment.
- Work with Operations and Distribution Standards and Material for material substitution authorizations.
- Work with Environmental in support of hazardous material handling and disposition.
- Based on information from the following sources, Supply Chain will project the anticipated material needs for the remainder of the restoration:
  - Conference calls
  - Discussions with Operations management
  - Resource allocation
  - Historical data

    This calculation happens on a daily basis.
  - Information from Staging Site Logistics leaders

Outputs

Materials and equipment

Staging Site Resources Summary

The Staging Site Resources group is responsible for:

- Coordinating the following:
  - Transportation

- Laundry
- Meals
- Ice
- Drinks
- Parking
- Trash
- Port-o-cans
- Washing stations
- Lighting
- Other non-operational items such as dust control, etc.
- Temporary housing if required

- Working with vendors who provide those services on site
- Working with Purchasing to identify and contract with vendors who provide those services off site

Staffing

- Manager
  - Responsible for management and oversight of the logistics network
  - Oversees Lead Coordinators
- Staging site lead logistics coordinators personnel: Responsible for directing the activities of the logistics coordinators at the site and working with the Hotel Coordinators to resolve any hotel issues
- Logistics coordinators: Responsible for the coordination of logistic activities at CNP facilities and staging sites

Inputs

- Authorization to begin setting up staging sites (from Operations)

- Number of staging sites to be set up (from Operations)
- Number of arriving crew (from Resource Acquisition)
- Estimated arrival times for crews (from Resource Acquisition)
- Which staging sites crews are assigned to (from Resource Unit)
- Where crews will be housed (from Hotel Coordination)
- Where crews are re-assigned to (from Resource Unit)
- When staging sites will begin to be demobilized, and how quickly they will be demobilized (from Situation Planning)
- Signage (from Security)
- Busing needs (from Hotel Coordination)

Tasks

- Handle all creature comforts, as defined above
- Support vendors providing services
- This group is not responsible for fleet, fuel, materials, security, hotel coordination, or operations- related tasks (such as assigning work or mobilizing crews).

Outputs

- Information on financial implications of staging site logistics (to the Finance Section)
- Documentation of additional services above initial scope (to the Finance Section)
- Documentation of services agreed to and rendered (to the Finance Section)

D.3.4.3 Fleet and Shops Services Branch Introduction

Fleet and Shops Services is responsible for:

- Making sure that employees have the vehicles they need for emergency work
- Ensuring that those vehicles are properly maintained
- Fueling employee, contractor, and mutual assistance vehicles
- Coordinating the deployment, tracking, and return of light fleet rental vehicles
- Making all bargaining unit employees not directly involved with specific storm duties available to the Resource Unit for reassignment as needed for distribution system restoration

Fleet Services

Summary
Fleet Services is responsible for pre-planning activities and execution of EOP plans necessary to provide assistance to all CNP transportation and fueling-related activities.

Fleet Services will assist Mutual Assistance and Contract Crews with the following:

- The identification and contact of area Fleet Service providers to support mutual assistance crews and contractors with vehicle and equipment maintenance/repair needs
- Establishing communications links
- Arranging for unique fuel and assistance in coordinating maintenance requirements
- Locating local supplies of repair parts and tire repair for foreign vehicles

CNP is **not** responsible for the actual repair work on contractor or mutual assistance vehicles. CNP simply helps with communication links between contractors/mutual assistance and fleet services providers.

Staffing

- Manager of Fleet and Shops Services

- The number of fleet resources will vary based on the severity of the storm. The remainder will be allocated to EOP roles.

Inputs

- Requests for vehicles from service centers
- List of staging sites that are open, and their fueling capacities
- Requests for repairs

Tasks

- Coordinate all CNP vehicle maintenance
- Provide fuel for all CNP, contractor, and mutual assistance vehicles Crews will be placed on 16-hour shifts at maintenance and fueling garages as necessary to support restoration efforts.
- Find and assign underutilized vehicles that are needed in the field
- Perform repairs on CNP vehicles as needed

Outputs

Operational and adequate fleet

Fleet Support Summary

Fleet Support is responsible for providing back-office support for both Fleet and Shops Services for restoration efforts, as it relates to procurement and accounting for fuel purchases and work order activities.

Staffing

- Manager of Fleet and Shops Services
- Lead
- Fleet support personnel

Inputs

- Information on Staging Site fueling activities
- Information on fuel capacities from fuel providers (Sun Coast)

Tasks

- Reconciling fuel usage and expenses
- Replenishing fueling supplies

Outputs

- Adequate fuel supply
- Reconciliation of fuel and expenses (to Finance Section)

Shop Services

Summary

Shop Services is responsible for:

- Providing preplanned assistance in services and personnel to repair or replace CNP tools involved in restoration efforts.
- Repairing and providing replacement parts for damaged sectionalizing equipment needed to restore the transmission, substation, and distribution systems
- Performing custom repairs/fabrication of parts for substation equipment
- Assisting with field response and repairs to IGSDs as needed

Staffing

- Manager of Fleet and Shops Services
- The number of Shops resources will vary based on the severity of the storm. The remainder will be allocated to EOP roles.

Inputs

- Requests for custom fabrication work and repairs to the distribution infrastructure (from the field)
- Requests for field force tool repairs (from the field)
- Requests for grounds

Tasks

- Fill the orders for custom fabrication work and repairs
- Issue protective grounds
- Build additional grounds if required

Outputs

- Working equipment
- Fulfillment of requests for repair work
- Adequate supply of grounds

D.3.4.4 Facilities Branch Summary

Facilities is responsible for:

- Preparing facilities in advance of an event
- Coordinating the repair of damages at CNP-owned facilities
- Ensuring that CNP-owned facilities have adequate facility supplies and services

Staffing

- Manager
- Site EOP Facilities Coordinators (one per staging site)

- Facilities Support personnel (contractors), responsible for assisting the Facilities Coordinators as needed

Inputs

Requests for repairs or services

Tasks

Repair facilities as needed

Outputs

- Operational facilities
- Status reports as requested

D.3.4.5 Security Branch Summary

Corporate Security is responsible for:

- Maintaining a safe and secure work environment for all personnel and vehicles involved in EOP recovery.
- Securing assets during EOP Coordination and deployment of 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
- 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 Harris County Toll Road Authority (HCTRA)
- On-going maintenance, monitoring, and responses to electronic security systems

Staffing

In the field:

- 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

- Keeping time 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

D.3.4.6 Staging Site Management Summary

Staging site management is responsible for setting up and managing bases of operations for major restoration efforts involving mutual assistance and contract crews.

Staffing

- One senior level manager per primary and secondary staging site, to set up and administer the site

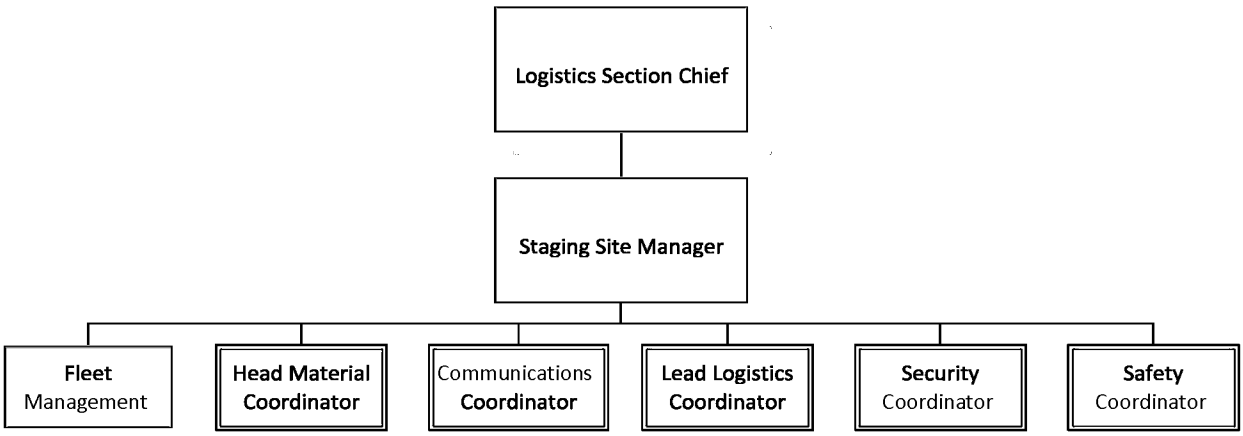
The secondary site managers will assist the primary site managers as needed

- Support personnel in order to provide Distribution Operations and their crews with basic services
- Security personnel: Responsible for:
  - Establishing a safe and secure area for the coming and going of all personnel and vehicles
  - Providing those crews with appropriate identification
  - Directing traffic, including hotel buses
  - Arranging for convenient parking of crew trucks
- Fleet personnel: Responsible for:
  - Locating the fuel skids in a safe and convenient location
  - Having all crew trucks fueled and ready for duty each day
  - Repairing and maintaining of internal fleet vehicles
  - Arranging for rentals if necessary
  - Putting external crews in touch with repair vendors
- Materials personnel: Responsible for:
  - Obtaining and stocking basic materials and supplies needed by the restoration crews
  - Providing tools

- Providing occasional hot shot delivery services to crews in the field

- Communications personnel: Responsible for establishing the communication network at the staging site, including telephone, internet service, and technical support.
- Staging Site Logistics personnel: Responsible for:
  - Providing sit down breakfast and dinner for all foreign crews and staging site support personnel
  - Providing carry out lunches
  - Taking care of crew laundry service and staging site cleanup services
  - Coordinating the service of portable restroom services

The following is the organizational structure of each site*:



Note: This is the structure for the Logistics branch only. Sites will also have Operations assigned to it and other support functions, such as Resource Check-in Coordinators.

Inputs

- Notice from Distribution Operations Branch Director about which sites need to be activated (the sizes of the staging sites that are activated determines the list of resource requirements)
- Kick-off pallets from the Special Material Release (from Supply Chain)

- Number and estimated arrival time of incoming crews (from Resource Acquisition group

Tasks

- Help with initial clearing of debris at staging sites
- Assist with coordination of staff that primarily are responsible for security, logistics, materials management, communications, fleet services, staging site resources, or facilities
- Set up flow patterns for traffic, including signage
- Establish parking
- Ensure the safety of the staging site
- Resolve issues that arise over the course of the restoration effort

Outputs

- Safe, functional staging site

D.3.5 Finance Section

D.3.5.1 Summary

The Finance Section is a critical part of ICS in complex incidents involving significant funding. The Section Chief tracks and reports to Incident Command the accrued cost as the incident progresses and may also be asked to provide forecasts to ensure operations are not negatively impacted. Some of the functions that fall within the scope of this Section are conducting overall cost analysis for the incident and maintaining typical operations such as accounts payable, and revenue billing. The Finance Section is responsible for:

- Minimizing financial risk and loss for CNP
- Tracking costs related to the event

- Reimbursing applicable parties per their existing agreements with CNP
- Helping to put together damage estimates for smaller events

Within the Finance Section, four primary Branches fulfill functional requirements:

- Reporting: provides cost analysis and forecasts to Incident Command
- Financial Services: continues typical operating functions such as accounts payable, remittance processing and revenue billing
- Insurance: administers all claims other than auto, general liability and excess liability
- Treasury: manages cash funding requirements

Although most groups in the Finance Section operate as normal, their activities are related to the Storm EOP. A brief summary of responsibilities are listed below.

D.3.5.2 Reporting Unit Summary

The Reporting Unit provides cost analysis and forecasts to Incident Command.

Staffing

- Reporting Unit branch director
- Liaisons

Inputs

Restoration:

Ad hoc reporting requests

Post-restoration:

- Requests for reporting

- Assumptions related to the regulatory recovery of storm costs (from Regulatory Reporting)

Tasks

Pre-storm:

- Send out information on how internal employees track time during a Storm EOP
- Setting up the cost collectors for an anticipated storm event

Restoration:

- Put together an estimate of what the storm will cost
- Coordinate with other Finance groups to gather the information needed for internal and external reporting, including:
  - Analysis of the impacts to revenues, operating expenses and capital
  - Timing and amount of regulatory recovery of storm costs
- Respond to requests for reports

Post-restoration:

- Coordinate with other Finance groups to gather the information needed for reports
- Respond to requests for reports
- In the event is serious enough that the Company service area is declared a federal disaster area, coordinate with the Tax department and Insurance to determine the amount of tax deduction

Outputs

Restoration:

- Estimate the amount that the storm will cost and the amount of regulatory recovery (to Investor Relations and Regulatory Reporting areas)
- Information on how to track costs

Post-restoration:

Financial reporting as required to support regulatory efforts (to Regulatory Reporting branch director)

D.3.5.3 Financial Services Summary

Accounts Payable ensures timely payment for goods and services rendered during restoration. Remittance Processing ensures the timely processing of checks. Payroll and Administration ensures timely payment to staff. Electric Revenue Billing determines the correct billing information to send to REPs on behalf of customers and calculates lost revenues

Financial Services does not have an official Storm EOP status. They will continue their normal activities during a Storm EOP. However, these activities are related to Storm EOP.

D.3.5.4 Insurance Risk Management Unit Summary

The Insurance Risk Management Unit is responsible for administering all claims other than auto, general liability, and excess liability.

Staffing

This group does not have an official Storm EOP status. They will continue their normal activities during a Storm EOP. However, these activities are related to a Storm EOP.

The staff includes 3 Corporate Insurance Coordinators and 1 administrative assistant.

The other Insurance staff are loaned to other branches during a Storm EOP, except the administrative assistant. The administrative assistant reports workers compensation claims through the One Call procedure.

Inputs

- Insurance claims information from daily status conference calls
- Injury information from Disability Management
- Workers compensation claim payments (from an outside vendor)

Tasks

- Notify property insurance brokers and adjusters if damage exceeds deductible
- Assist Environmental, Safety, Legal and Human Resources' representatives with submission of company incident reporting forms to meet insurance policy discovery and reporting time deadlines/restrictions.
- Gather preliminary facts and create reports for adjusters based on damage inspections of locations.
- Coordinate arrangements for adjusters to be at the damaged sites.
- Provide estimate of the property loss
- Assist affected business units, gather documentation to support an insurance claim.
- Manage claims through settlement.
- Process workers compensation claim payments on a weekly basis

Outputs

- Reports for executives as needed
- Deposit proceeds as directed by affected business unit
- Payments for workers compensation claims

- Information on lost time workers compensation claim payments (for Payroll salary continuation)

D.3.5.5 Treasury Summary

Shareholder Services: Serves as transfer agent, registrar and dividend paying agent for CNP common stock and administers CNP's Investor's Choice Plan. Long-term Finance: Long- Term Finance evaluates and implements financings, ensures that compliance reporting and other requirements in financing agreements are satisfied and administers trust relationships.

This branch does not have an official EOP status. They will continue their normal activities during EOP. However, these activities are related to EOP.

Tasks

Coordinate with the Director Operations for cash funding requirements prior to the storm. Per the CNP General Expense and Reimbursement policy, cash advances during an emergency other than EOP must be approved by the Business Unit President or functional area leader. Cash advances normally not available may be made available during an EOP situation when the card holder has established the cash feature of his or her OnePay card.

Section E: Annexes

Per 25.53. the following annexes are included in this section:

- Annex A – Weather Emergency Annex
- Annex B – Load Shed Annex
- Annex C – Pandemic and Epidemic Annex
- Annex D – Wildfire Annex
- Annex E – Hurricane Annex
- Annex F – Cyber Security Annex
- Annex G – Physical Security Incident Annex
- Annex H – Mobile Generation/Long Lead Time Facilities Annex

Annex A

Weather Emergency Annex

Hot Weather Emergency

PURPOSE

The purpose of the hot weather emergency annex is to provide a guide on preparing for and responding to extreme heat measures that could impact the CenterPoint Energy Houston Electric (CEHE) footprint.

SCOPE

There are two distinct responses that could cause an elevated response from CEHE during an extreme heat situation.

- Load Shed as directed by ERCOT
- Widespread outages due to heat related transformer outages (also known as a Transformer Tsunami)

RESPONSE – 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 utilized the Emergency Operation Plan (EOP) as necessary to support this response.
- For additional information regarding the load shed plan, please reference (Annex B)

RESPONSE – Equipment Failure

- Distribution Operations maintains a Storm Response Organization to respond to localized weather events. It is the responsibility of the Incident Commander (IC) on duty to monitor the situation and determine if the Response Plan within Distribution Operations should be activated.
- Upon activation, the Incident Command structure will be based on the roles identified in the Storm Response Plan. 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 the EOP at Level 1 to provide additional support and garner additional awareness from leadership.
- For additional information, please reference the CEHE Storm Response Plan.

Cold Weather Emergency

Proactive Weatherization

- CEHE designs its transmission circuits to conform with the latest edition of the 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 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 has a comprehensive transmission line inspection and rehabilitation program based on a 5-year cycle to ensure that the integrity of existing transmission structures and wires is maintained. Twenty percent of the transmission system is ground inspected and maintainedeach year. Any line component identified that will likely cause a failure or a circuit outage within a critically short period of time is promptly addressed.

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 has a comprehensive distribution wood pole inspection and rehabilitation program based on a 10-year cycle to ensure that the integrity of existing wood pole structures is maintained. Ten percent of the transmission system is ground inspected and maintained each year. Any line component identified that will likely cause a failure or a circuit outage within a critically short period of time is promptly addressed.

Anti-galloping

- Additionally, beginning in 2015 and continuing into 2022, CEHE has completed system hardening projects to retrofit portions of 69 kV and 138 kV transmission circuits with anti-galloping devices to avoid damage from icing conditions.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex B

Load Shed Annex

Load Shed Annex

Procedure for controlled shedding of load

Pursuant to the ERCOT Protocols, the Company coordinates with ERCOT during an Energy Emergency Alert (EEA) event. Real-Time Operations Dispatchers coordinate electric grid activities with ERCOT System Operators using ERCOT Protocols and Operating Guides as well as in-house procedures. CNP is required to implement ERCOT-directives to maintain grid reliability.

In accordance with NERC Standard TOP-001-5 R1, without direction from ERCOT, the Company has the flexibility to curtail load by a variety of means, which include implementing the following measures, as time permits:

1. Curtailing all non-essential load within Company facilities;
2. Reducing distribution circuit voltage to achieve load reduction; and
3. Appealing through the media that all customers voluntarily reduce load.

After implementing the above measures, if circumstances require that load be reduced further, the Company will initiate its manual load shedding programs. This is accomplished by shedding distribution circuits as necessary to maintain system frequency, while rotating the outages of distribution circuits. Circuits are divided into four categories called "blocks". The blocks consider the following: Emergency Load Reduction Schedule (ELRS), NERC standards, and ERCOT Protocols and Operating Guides. In the event that the manual load shedding program does not correct the emergency conditions, automatic under-frequency programs will be activated at the following specific frequency levels: 59.3 Hz, 58.9 Hz and 58.5 Hz. Load assigned to the block for each frequency will in turn be curtailed.

Priorities for restoring shed load to service

Load manually shed as a result of an ERCOT declared EEA load shed event will be rotated and restored based on the order of the distribution feeders for each block as defined in the ELRS.

Hazardous conditions, such as downed power lines, are the highest priority. Because the objective is to restore service to as many customers as possible, restoration of transmission circuits, substations, and distribution feeder mains are begun simultaneously. The distribution restoration proceeds in the following order:

1. primary feeder lines;
2. primary fused laterals;
3. transformers;
4. secondaries; and

5. service drops.

Inspection of and repairs to the feeder circuits are prioritized, so that service to large blocks of customers can be restored as soon as possible. Crews are directed that they must sweep the circuit (i.e. repair ALL damage related to that circuit: circuit, fuses, transformers and service drops) before moving on to the next circuit. After this, the restoration effort is guided by information provided by the Company's Outage Management System (OMS). The information printed on each trouble order includes the name of the device determined to be out of service as well as the number of customers affected. After a device is determined to be out of service, the Company stops printing further orders unless a hazardous condition is reported. Trouble orders from OMS are dispatched to the crews in the affected area in the following order:

1. line-fuse vicinities;
2. transformer vicinities; and
3. single order lights out.

The crews then schedule repairs on the basis of the critical nature of the customers and the location and number of customers affected. This system allows for an orderly and prompt response in restoration of the Company's delivery system.

Procedure for maintaining an accurate registry of critical load customers

Critical loads are defined by the PUC as "loads for which electric service is considered crucial for the protection or maintenance of public safety; including but not limited to hospitals, police stations, fire stations, critical water and wastewater facilities and customers with special in-house life-sustaining equipment."

The Company 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 Critical 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, 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.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex C

Pandemic and Epidemic Annex

Pandemic and Epidemic Annex

Introduction

CNP, like many other businesses and governmental entities, has developed over the years a variety of business continuity plan 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 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 from a wide variety of authoritative 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.

Objectives

CNP's interest is in preparedness, not panic. It is recognized that a knowledgeable, confident and healthy workforce will represent a key factor in the success of our response plan activities. CNP has three main objectives for the Pandemic Preparedness Plan:

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 plan 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, global economy, an outbreak of a pandemic infectious disease may provide little lead time before operations are affected. CNP 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 providing vaccinations and other medications to the extent that they are available, and
- Stressing the need for the sick or those potentially exposed/impacted to remain away from the workplace.

An important weapon 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, CNP employees will also need to focus on supporting the business services upon which our communities heavily rely.

Managers:

Each manager and supervisor should develop and maintain business process alternatives and business continuance plans with the expectation that a significant portion of their staff may be unavailable or away from usual work locations. In order 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 Response Plan Team (CRPT) Notification

1. The Corporate Response Plan is the Company's strategic resource on how to respond to various types of incidents and crises. The CRP is designed to ensure that resources and other support are provided to the business following an incident.

2. If an incident shows potential for escalation, it is recommended you notify the CRPT immediately.

3. To report incidents and contact CRPT during an incident, please utilize the Corporate Response Telephone and Mailbox.
4. The CRPT consists of the following personnel:

Function	CRP Description
Finance	Finance Officer
Legal	Legal Officer
CCR	Corporate Communications Officer
Safety	Safety Officer
Gas Operations	Gas Operations Officer
Electric Operations	Electric Operations Officer
IT	IT Officer
HR	HR Officer
Regulatory	Regulatory Officer
ERM	Head of ERM
Security	Head of Corporate Security
Customer	Customer Officer
ERM Analyst	ERM Analyst
Emergency Operations	EOP Coordinator

Critical company functions

Unlike the disasters contemplated by some of the company's other business continuity plan, a pandemic 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 constitute CNP.

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. CNP'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 plan 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 public or private 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 to be 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. Table B within the Appendix details the actions CNP will take at this phase of a Pandemic event.

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 should be noted that a pandemic may affect countries, as well as populations within a county, to varying degrees during any of these alert phases as the infectious disease spreads.

Recovery Period

Once the pandemic wave has passed, CNP 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, CNP will be focused on employee education, departmental contingency planning, workplace health and safety, and response activity practice. Beginning with Pandemic period, CNP 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 CNP stakeholders has been identified as a key element to the effectiveness on the Preparedness Plan.

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

CNP's employees are our most valuable assets and will continue to be given careful attention in preparation for a potential pandemic. The company will endeavor to maintain a healthy and safe work environment, as well as emphasize the vital role and responsibility of the employee in CNP'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 Preparedness Plan, discussion with the employees about their roles and responsibilities and rehearsing response activities as appropriate for each work group to sustain confidence in the effectiveness of the plans.

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 CNP's Pandemic Preparedness Plan
- 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

CNP 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.

Training:

The Pandemic Preparedness Plan Team will meet annually to discuss necessary updates to the plan. A corporate communication will be sent to CNP managers annually to educate on the purpose of the plan and to encourage their employees to prepare for such a threat.

Educational resources will be available and accessible to all employees on the CNP Today Pandemic page.

Educational resources

CNP's Pandemic Preparedness Plan 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 CNP'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

Conclusion

CNP will routinely review and update this preparedness plan so that response activity strategies can remain current and effective. The success of the company's response activities, if and when they are needed, will not only be dependent on full employee participation in the review and understanding of these plans, but their practice as well.

Annex D

Wildfire Annex

Wildfire Mitigation Efforts

The Company performs periodic maintenance including clearing trees away from the conductors and equipment on approximately 1,600 circuits. This proactive maintenance takes place on a cyclical basis. For 35kV voltage and some selected 12kV circuits, maintenance is performed about every three years while the remaining 12kV circuits are maintained on a 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.

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 performs an annual inspection of the whole transmission system to identify hazardous trees or other vegetation issues that need immediate attention. Additional inspections may be performed in selected areas as warranted by conditions or situations conducive to increased tree mortality or risk exposure.

Additionally, when advance notice of a hazardous fire conditions are issued by the local Fire Marshal that could involve transmission ROWs and facilities, mowers are dispatched to reduce brush within the ROWs along with herbicide contractors to apply fire retardants to the bases of the Company's towers and structures to mitigate or reduce potential fire damage.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex E

Hurricane Annex

HURRICANE ANNEX

A. Introduction

This annex provides a framework for the activation of the EOP 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.

In order 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.

Electric Operations leadership, or authorized designees, shall have the following responsibilities:

- Activating the EOP when a system-wide storm emergency situation exists or a threat is imminent
- Directing all operations once the EOP is activated
- Keeping the President and Chief Executive Officer of CNP informed of system conditions, activities, and progress towards restoration of electric power under the EOP

B. Pre-Storm Preparation

Hurricane Drill

To promote familiarity with the EOP, a general hurricane drill exercise is outlined below. When possible, this exercise coincides with the State Hurricane exercises to provide increased realism. Mock hurricane advisories are communicated similar to those given by the local National Weather Service (NWS) during an actual storm. These notifications are designed to test tracking and activation procedures. These advisories are given regularly during the exercise. Minor disruption of some regular employee activities is anticipated but there are no line crews engaged.

The primary objectives are:

- Testing the communications involved with activation of the Emergency Operations Plan;
- Testing employee information systems:
    - Corporate email
    - Corporate employee hotline
- Evaluating pre-season preparations;
- Verifying knowledge of specific EOP duty assignments;

- Activating the Incident Command Center in the Greenspoint Annex ;
- Activating the Distribution, Transmission and Substation, and the Energy Control Evaluation Centers;
- Utilizing recommendations from previous exercises and events to test and practice Storm EOP procedures;
- Evaluating implementation of Incident Command processes and procedures;
- Simulating media and regulatory reports; and
- Simulating damage assessments and restoration schedules between evaluation centers, and posting them in a test version of Outage Tracker.

If the annual Company functional exercise coincides with the State of Texas hurricane exercise and the City of Houston and/or the Harris County Office of Homeland Security and Emergency Management have activated their Emergency Operations Centers, then the Company will also test communication techniques with those entities.

EOP Storm Roster

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

- Manage Storm EOP 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 EOP-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 an EOP 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 EOP event is declared prior to the start of that vacation, the employee is expected to talk to his or her EOP leader and direct supervisor. The EOP 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 EOP role.

If an employee is already on vacation and out of town at the time the Company declares a storm EOP event, the employee is not expected to immediately return to fill his/her EOP role. Upon returning from vacation the employee is expected to immediately report for EOP 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 EOP 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 EOP duties. The request will be reviewed by management and a decision made within 30 days after the final day of the EOP event.

Employee Responsibilities

If the Company activates the EOP 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 storm preparation prior to a Storm EOP event and lodging planned for "First Responders" with established criteria will be communicated by local management.

Business continuity during an EOP is critical. All employees, whether in their normal job or an EOP 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 EOP is to the assigned EOP Leader. Daily assignments during EOP will be determined by the EOP Leader and employees may be asked to take on different assignments as needs change during the service restoration process.

• Participate in the annual EOP Drill, training, and other planning activities as required.

• Make the necessary personal pre-storm preparations to be ready and available to perform the EOP 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 EOP.

• Maintain a hard copy of important phone numbers, including EOP contacts, immediate supervisor, CNP Storm Mailbox (which provides general information during EOP) 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 EOP is declared (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 EOP assignments, in advance of EOP 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 EOP.

• Maintain current contact information in Employee Service Roster (ESR) and ensure their EOP Leader and immediate supervisor have the most current information.

• Notify immediate supervisor and EOP Leader throughout the year and during EOP assignment, if necessary, of any change in personal needs or responsibilities that may affect their ability to fulfill their EOP assignment. Examples could include: change in residence, phone numbers, or fitness for duty.

• Establish and maintain contact with immediate supervisor and EOP Leader in the event of EOP activation and throughout the active period.

• Recognize EOP 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 EOP assignment may subject employees to disciplinary action, up to and including termination of employment.

C. INITIAL STORM ACTIVATION

Basis of activation

The Company determines when it activates the EOP and response activities based on StormGeo data on the anticipated intensity of the event. The StormGeo program issues trigger reports every six hours leading up to the event. These reports help determine the appropriate course of action. The Company uses the following phases to guide the actions to be taken but the Incident Commander has the authority to deviate from these guidelines:

Trigger parameter	Phase
Response Plan Activator (RPA) is positive *	1
The Worst Case Scenario (WCS) for 39 mph winds reaching this location is < 120 hours and the probability of 58 mph Wind Impacting (PWI) this location is > 8%	2
The WCS for 39 mph winds reaching this location is < 96 hours and the PWI of 58 mph at this location is > 15%	3
The WCS for 39 mph winds reaching this location is < 72 hours and the PWI of 58 mph at this location is > 20%	4
The WCS for 39 mph winds reaching this location is < 66 hours and the PWI of 58 mph at this location is > 25%	5
The WCS for 39 mph winds reaching this location is < 60 hours and the PWI of 58 mph at this location is > 25%	6
The WCS for 39 mph winds reaching this location is < 54 hours and the PWI of 58 mph at this location is > 25%	7
The WCS for 39 mph winds reaching this location is < 48 hours and the PWI of 58 mph at this location is > 30%	8
The FTA for 39 mph winds reaching this location is < 36 hours and the PWI of 58 mph at this location is > 50%	9

Activation Alerts

The Company has a three level alert system for weather and system conditions which are used in operations and are not exclusive to a hurricane , storm, weather related or other event. These three EOP levels are designed to ensure sufficient resources are available to effectively respond to any type of event impacting CEHE's service territory. The Company is beginning to implement three activation levels in 2021.

The following is a summary of the alert levels that may be activated, based on the needs, during a specific type of event:

EOP Level 1:

- Short duration or low impact event affecting the entire CEHE service territory
- Severe impacts to only a specific area of the CEHE service territory
- Additional support roles may be needed

EOP Level 2:

- Medium duration and impact event
- Severe impacts to multiple areas of the CEHE service territory
- Additional support roles needed

EOP Level 3:

- High duration and impact event
- Severe impacts to all or nearly all areas of the CEHE service territory
- All support roles needed unless otherwise notified
- Individual department emergency plans and/or business continuity plans initiated as needed, and Corporate Response Plan activated as appropriate

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

Evacuation and Re-Entry Procedures

In the event of a storm, the Galveston and Baytown Service Centers evacuate in conjunction with activation of the evacuation plans of Harris 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 EOP Storm 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:

1. Fleet will send a list of the license plate information for any rental vehicles to Corporate Security as soon as possible.
2. Fleet will send a list of the license plate information for Houston-area fleet vehicles and trailers.
3. Service Area Managers will provide a list of the license plate information for any EOP responders needing access to the toll roads and submit it to the Security Branch.
4. Check-in Support at the staging sites will gather CNP personnel license plate information and submit it to Corporate Security.
5. During check-in of mutual assistance crews at staging sites:
6. 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.
7. 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.
8. Site administrators will send these lists to the Security Branch via fax or email.
9. The Security branch will send the license plate information to HCTRA for entry into their system to automate the "No Fine" process.

10. 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.

Factors CNP Uses to Determine EOP Phases

Factor	Description
Hurricane Risk Indicator (HRI) goes positive for the report location.	A negative HRI for a location denotes no hurricane threat has been identified through the coming week. When StormGeo identifies a location as "Positive" for a hurricane risk, in addition to putting that notice atop the TropicsWatch web page, they will also notify CNP's EOP Coordinator by phone and by email.
Worst Case Scenario (WCS) for 39 mph winds reaching the report location	StormGeo's Worst Case Scenario (WCS) parameter lets CNP know the approximate earliest arrival times of 25, 39, 58, 74, and 100 mph winds at defined report locations if an active storm were to quickly travel straight to that location. CNP's WCS activation parameter will be based on the 39 mph wind. Assumptions: The storm movement is directly toward our location Assumes a forward speed equal to the maximum forecasted forward speed over the time period prior to the storm's ETA at our location Intensity is set to the projected maximum sustained winds possible during the time period from the current position until it reaches our location Wind field size is set to the maximum projected in any one quadrant of the storm prior to reaching our location
The Probability of 58 mph Wind Impacting (PWI) the report location.	StormGeo's "Probability of Wind Impact" displays the probability of a location receiving a certain threshold of wind. Wind probabilities will be calculated for wind speeds of 25 mph, 39 mph, 58 mph, 74 mph and 100 mph. CNP's PWI activation parameter will be based on the 58 mph wind.
The Forecasted Time of Arrival (FTA) of 39 mph winds reaching the report location	As the certainty of impact to the Company's service area becomes definite, the forecast changes from Worst Case Scenario to Forecasted Time of Arrival (FTA). Again, EOP activation parameter will be based on the 39 mph wind.

Factor	Description
Sustained Winds fall below 39 mph	As the storm begins to move out of the Company's service areas, StormGeo will forecast when wind speeds for each report location are scheduled to fall below 39mph.

Activation Phase Descriptions

The following table describes fourteen phase points for which CNP has designated specific storm preparation activity. This table describes the parameters required to determine when each of these phase points has been or will be achieved. These phases are based on When StormGeo 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 with CNP's EOP Coordinator by phone and by email.

Phase	Description
1 - Hurricane risk indicator is positive	**Notification to executives** The EOP Coordination Team communicates potential storm threat to executives. Keep executives clearly informed of developing storm conditions and obtain concurrence to begin employee communications.
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/Employee Information Officer (P/EIO) sends out company-wide communications to employees to tell them to prepare home and family for a storm, know their EOP assignment, etc. The P/EIO also keeps employees clearly informed of developing storm conditions. **Functional managers verify and report EOP readiness** Make an early ID of shortfalls and take corrective actions as necessary (roster, supplies, personnel, facilities, ice machines, telecommunications, generators, etc.). **Branch directors leaders initiate communication with EOP-assigned employees** Keep EOP assigned employees clearly informed of developing storm conditions and notify them to begin preparations for manning their EOP assignments. Confirm information for EOP team members.

Phase	Description
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%	**RTO implements storm updates using email and text messaging systems** RTO 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 as to direction/intensity of storm.
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%	**Incident Commander declares EOP activation** The Incident Commander makes recommendations for this action based on latest updates from StormGeo. **The Resource Acquisition group contacts Regional Mutual Assistance Groups (RMAG's) as needed to set up mutual assistance conference calls.** CNP 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. Following is their contact information: S.E.E. – Contact any S.E.E. staff member at 404-233-1188 and let them know you wish to hold a conference call for storm response. Refer to the S.E.E. Mutual Assistance Procedures and Guidelines, Section 9.3, for additional information. Midwest – CNP may contact EON-US (Shenita Gazaway 502-627-3925 or David Guy 502-627-4104) to request that a Midwest conference call be set up. Texas – CNP may refer to the Texas Mutual Assistance Conference Call Guidelines. CNP may send an e-mail to each member on the roster announcing a conference call, and provide a 1-800 conference call number with password. **Logistics section makes lodging arrangements** This action is taken in preparation to accommodate CNP personnel that are storm riders and first responders that must evacuate according to the Harris County Office of Emergency Management. These activities continue as more zip codes are evacuated. The Lead Hotel Coordinator should book hotel space based as CNP head count determined. **P/EIO implements communications plan/activate storm hotline**

Phase	Description
	Finance submits a request for cash to Treasury **Logistics section secures food beginning 48 hours after the landfall** Operations section secures enough food to feed personnel at all EOP 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 and Baytown Service Center evacuations in conjunction with evacuation plans for Harris and Galveston counties. Baytown Service Center will evacuate to Humble Service Center. Galveston Service Center will evacuate to South Houston Service Center. **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. **Telecom executes cell relay/DCE extensions to maximum days** **Grid & Market Operations sends communications to Texas market regarding possibility of interruptions regarding meter data** **Operations assesses the operability of production IG devices** **Telecom considers securing satellite telephone rentals** Telecom Services will evaluate need of rental satellite telephones for the staging site supervisors. **Telecom considers securing portable voice radio rentals** Telecom Services will evaluate need of 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%	**Incident commander conducts conference call** Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event

Phase	Description
	• type of event • damage projection • time of impact • duration of event • EOP timeline status • plan for recovery • level of preparedness • communications **Logistics alerts material and logistics suppliers** The Logistics sections provide these suppliers with advance notice to begin making their preparations to supply CNP 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** The Logistics section delivers the remaining EOP material and bedding to service centers in advance of evacuations. **Logistics analyzes EOP 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. **Logistics alerts staging site owners** Staging site supervisors make preliminary contact with the staging site owners to notify them of our possible intent to activate our contracts with them. **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

Phase	Description
	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 in a face-to-face meeting. The main objective is to provide an update 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 Incident Command Center** CNP will: • Ensure all systems and equipment at the Incident Command Center are functioning properly • Obtain supplies as needed; set up rooms as planned • Set up computers, telephones, Satellite TV access • Test communications • Ensure that the Incident Command Center phone number rings at that location. **The Public/Employee 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 Evaluation Centers** Telecom visits each evaluation center and tests its radio for operational performance.
8 - The worst case scenario for 39 mph winds reaching this location is < 48 hours and	**Logistics updates logistics and material suppliers**

Phase	Description
the probability of 58 mph winds impacting this location is > 30%	The Logistics section provides these suppliers with updated information to assist them in their preparations to supply CNP storm requirements. **Logistics updates staging site owners** Staging site supervisors 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 EOP storm needs. Based on severity of storm, Fleet will contact potential users of rental vehicles to determine pre- and post-storm needs, and 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 mph wind impacting this location is > 50%	**Conduct operations conference call** Distribution Operations branch managers, SADs, and service center operations conduct a conference call to determine progress of preparation. **Logistics section activates logistics (suppliers, caterers, etc.)** At the direction of Operations, the Logistics section engages logistics suppliers to execute CNP EOP logistics plan. **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 PEIO/management communicates with employees regarding EOP show up time** **Logistics activates staging sites as required at the direction of Operations** Logistics begins activating staging sites. They continue to update staging site owners if we will use or not use their facility.

Phase	Description
	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%	Incident Commander and Section chiefs conduct conference call Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event • type of event • damage projection • time of impact • duration of event • EOP 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.
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 and/or Baytown access** Once Harris and Galveston Counties have been evacuated and restrictions put in place by government entities, CNP 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**

Phase	Description
	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 am to 9 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 pm to 9 am) to ride out the storm and continue to work that shift throughout the restoration. **Incident Commanders conducts leadership conference call** Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event • type of event • damage projection • time of impact • duration of event • EOP timeline status • plan for recovery • progress of preparedness • communications

Phase	Description
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** 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 conference call to determine impact to their facility, equipment and ability to operate. They also report any initial damage assessment. Activate helicopters 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** Public/Employee Information Officer 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. **Logistics sets up staging sites** The Staging Site Managers within Logistics report on the progress of staging site setup to the Logistics Section Chief. The Logistics Section Chief will provide updates to Operations as needed. **Security director activates security and traffic control**

Phase	Description
	The director of Security, in the Logistics sections, works with local authorities to provide access for CNP personnel conducting restoration activities to storm-damaged areas. The director also provides security and traffic control for service centers and staging sites. Incident Commander and Section chiefs conduct conference call This is the first scheduled Incident Commander/Section chief update after landfall. The call may cover updated versions of the topics mentioned previously. **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 throughout the duration of the incident.

D. Command Centers

Upon activation of the EOP, the Company establishes evaluation centers. Assigned personnel at these evaluation centers act as data collection points for a variety of information such as specific system statuses, conditions, and restoration schedules. They also help CNP track progress for the following tasks:

- Coordination of logistical support and the assignment of manpower to support restoration priorities.
- Communication with outside utilities for assistance, arrival and departure schedules, and other coordination as needed.
- Information collected by these evaluation centers is relayed, compiled and displayed at the Incident Command Center.

Incident Command Center

The Incident Commander (IC) is responsible for establishing and operating the Incident Command Center located at the Greenspoint Annex – Room 1550. If necessary, a backup evaluation center will be stood up at the Bellaire Service Center Auditorium. Personnel will be assigned as necessary to make contacts with outside utilities using mutual assistance processes and the applicable agreements, posting

information as provided by other evaluation centers, and supporting other resource needs. Staffing requirements for the Incident Command Center will be based on a 24-hour operational period and will be staffed in 12 or 16-hour shifts as the Incident Commander deems appropriate based on the needs of the response efforts.

Access to the Incident Command Center is limited to assigned duty employees, command staff, and appropriate Company officers.

Activation of the Incident Command Center

At the discretion of the Incident Commander, storm riders must report to the Incident Command Center when specified by the IC. Advanced authorization may be appropriate when fully staffing the center if, in the judgment of leadership, it is necessary to avoid later unsafe road conditions and other possible hazards such as dangerous wind speeds.

Operation of the Incident Command Center

Initial activation of the Incident Command Center will be for the purpose of assessing the status of preparation by departments. The Incident Commander is responsible for scheduling and communicating the requirement for periodic conference calls to assess the status of preparation by the various departments. As the event approaches and crosses CNP's service area, personnel at the Incident Command Center will collect data on system conditions and customer outages initially from EC/DC. In order to ensure a continuing, accurate and consistent flow of information into the Incident Command Center, communications will be established only through the following points for reports issued by the Incident Command Center:

- Real Time Operations (RTO) at Addicks Operations Center (AOC)
- The Distribution Evaluation (DVAL) Center at Greenspoint Service Center
- The Underground Evaluation Center at Harrisburg Service Center
- The Transmission and Substation Evaluation Center at EC/DC

Distribution Evaluation Center

The Director of Distribution Operations will be responsible for establishing a Distribution Evaluation Center in the Greenspoint Service Center, 2nd Floor. The Operations Branch Director will staff and assign personnel as appropriate to the Distribution Evaluation Center 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 section chiefs 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 Evaluation Center room. 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 Incident Command Center via the scheduled periodic conference calls. Staffing requirements will be based on 16-hour shifts with adjustments as deemed necessary by the Incident Commander. Access to the evaluation centers shall be limited to assigned duty employees, interface personnel, and appropriate Company officers.

Activation of the Distribution Evaluation Center

The Distribution Evaluation Center shall be activated to assess and direct restoration activities and will be accomplished in coordination with the Incident Command.

Upon activation of the Incident Command, a report of readiness to the Incident Command Center will be required. The decision to staff the evaluation center prior to storm impact should be made based on projected accessibility after the event passes. In most cases, assessment of damage cannot begin until:143

- Daylight hours have arrived
- Flooding has receded
- Field personnel or helicopters can be safely sent into the impacted area

Operation of the Distribution Evaluation Center

The Distribution Evaluation Center is responsible for providing accurate and consistent information on a timely basis concerning the extent of damage to the distribution facilities, the plans to restore service, and the progress being made in executing that plan in their respective service centers and staging sites. CNP will need to use re-dedicated manpower or crews from

neighboring utilities or contractors. In order to achieve timely restoration, Resource Acquisition reports that information to Incident Command as soon as the information is available

Underground Evaluation Center

The Major Underground Manager will be responsible for establishing an evaluation center 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 Evaluation Center reports up through the Distribution Operations Branch Director.

Transmission and Substation Evaluation Centers

The Transmission / Substation Branch Director, or their designee, will be responsible for establishing the Transmission and Substation Evaluation Centers 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 Incident Command per the update schedule determine 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.

Activation of the Transmission and Substation Evaluation Centers.

Activation of the Incident Command will require a report of readiness from each evaluation center to the Incident Command Center, though staffing may not be necessary. The decision to staff the evaluation centers will be made based on accessibility both before and after the event passes. Preemptive steps may be taken to avoid or minimize system damage. In most cases, assessment of damage cannot begin until daylight hours and field personnel or helicopters can

be safely sent into the impacted area. Once the evaluation centers are fully staffed, a report will be made to Incident Command.

Operation of the Transmission and Substation Evaluation Centers

The Transmission and Substation Evaluation Centers are responsible for providing accurate and consistent information to the other evaluation centers on a timely basis. The Transmission and Substation Evaluation Centers will provide this information as the event develops and passes through the area, and will concern:

- Transmission network conditions
- The extent of damage to Transmission and Substation facilities
- The projected restoration of service plan
- The progress being made in executing that plan
- The need for and the ability to use re-dedicated manpower or crews from neighboring utilities to achieve timely restoration

Logistics Command Center

The Managers of Supply Chain, Procurement and Logistics are responsible for establishing the Distribution Material Evaluation Center at South Houston Materials Management, Building A. The Distribution Material Evaluation Center may relocate, as appropriate, to another CNP office facility. This location will be selected based on storm damage proximity and available office space. Alternate locations include the Cypress, Sugarland, and Spring Branch Service Centers. Personnel will be assigned as necessary to ensure that distribution material issues are resolved quickly and support the overall restoration effort. Details as to staffing, activation, operation, and communications are contained in the departmental plan for Logistics.

Annex F

Cyber Security Annex

CYBER SECURITY ANNEX

1. INTRODUCTION

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 initiate actions, procedures, and/or practices to stabilize any impact to business or operational systems which may jeopardize employee or public safety, or may result in material consequences to employee or customer information, or will result in interruption of business continuity. It is incumbent upon the user 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 have occurred. To detect, respond, and manage violations, incident response policies and procedures should be in place to minimize risk as well as facilitate recovery from a violation.

1.1. Purpose

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 quickly and efficiently recover from different levels of Information Security Incidents (as defined in Section 1.4).
- Define the business, Information Technology, 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 Information Technology Incidents response and incident management processes in order to establish a more effective strategy and response to future Information Security Incidents.

1.2. Scope

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

- The fundamental information actions and tasks needed for Information Technology personnel to provide incident response services to CNP's control system and/or related I.T. 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).

1.3. Issuing Authority

I.T. Director Corp Cyber Security, Corporate I.T. Cyber Security

1.4. Use of this Document

This document is designed to provide both the procedures and the essential tools (such as quick reference guides and checklists) for managing an Information Security Incident.

1.5. Maintaining this Document

This document will be subject to both planned reviews and continuous improvement activities. The document will be reviewed annually and approved by the Issuing Authority (Section 1.3). The CIRP will be reviewed during the follow-up meeting to every Information Security Incident initiation. Suggested improvements to the plan or to this document will be documented, sent to the Issuing Authority for approval and communicated to the individuals who have responsibilities within the process.

1.6. Training

It is essential training on the CIRP be performed regularly. All the key groups and roles described in the CIRP need both initial detailed training and periodic (at least annual) review training. Developing the training materials and conducting the training will be the responsibility of the Corporate I.T. Security Risk & Compliance group.

1.7. Process Improvement

In order to remain relevant and useful, this incident response plan needs to be continually improved. This is accomplished by enhancing the process documents with input from the lessons-learned sessions, conformance with industry standards and compliance with regulatory requirements. While this is a continuous process, it should occur at least annually.

2. SECURITY INCIDENT RESPONSE CAPABILITIES

2.1. Need for a Cyber Incident Response Plan

Cyber incident response is an organized approach to address and manage activities during and after an Information Security Incident. The goal of the CIRP is to handle the situation in an organized and effective manner, limit damage to the organization and reduce recovery time and cost. This CIRP provides guidelines on what constitutes an Information Security Incident and a process that must be followed when an Information Security Incident occurs.

2.2. Incident Preparation

To quickly respond to Information Security Incidents that could adversely affect the CNP environment, this CIRP should be followed to reduce the damage and minimize risk to the organization. The CIRT members should represent Subject Matter Experts ("SME") needed to help resolve the issue. Employees should be trained on how to respond to any suspicious activity.

2.3. Cyber Incident Response Team ("CIRT")

The CIRT is activated by the Director Corp Cyber Security or his/her designee.

The CIRT role is to provide a quick, organized and effective response to Information Security Incidents.

The CIRT's mission is to minimize serious loss of information, information assets and customer confidence by providing an immediate, effective and informed response to any event involving CNP's information systems, networks or control systems.

The CIRT is authorized to take appropriate steps necessary to mitigate and resolve a security incident. The team is responsible for investigating suspected intrusion attempts and loss of company information and assets in a timely manner. Additionally, the CIRT is responsible for reporting findings to management and to the appropriate authorities, as necessary.

Upon notification of an Information Security Incident requiring response, CIRT members must reprioritize their daily responsibilities to respond to the Information Security Incident and must have the appropriate level of authority to make decisions regarding risk and security measures.

2.4. Roles and Responsibilities

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 below with their roles and responsibilities during an Information Security Incident.

For each incident a contact list with assigned parties will be maintained.

2.5. Unavailability of Personnel

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 the list to the Director of Corp Cyber Security on a monthly basis.

2.6 Inner Organization Communications

In the event of a Priority Level 3 (Severity Level 2) Escalation or the Suspected Breach of Confidential Information, Initiate Contact with the following groups.

2.6.1 Legal Department/Data Privacy Office

Legal/the Data Privacy Office shall be notified immediately upon first indication of an Information Security Incident as well as when there is a material likelihood that confidential information has been affected by the Information Security Incident. If necessary, the Data Privacy Office will activate the Privacy Incident Response Plan. Consulting with legal counsel allows for guidance, direction, and ensures attorney-client privilege is appropriately attached

2.6.2 Corporate Response Plan Team

First Notify the Corporate Response Plan Team at Escalation to Priority Level 3 (Severity Level 2) in order to activate the Corporate Response Plan at the proper stage.

2.6.3 Technology Systems Control Center (TSCC)

First Notify TSCC at Escalation to Priority Level 3 (Severity Level 2) in order to activate the TSCC Incident Coordinator.

2.6.4 Corporate Communications

First Notify Corporate Communications at Escalation to Priority Level 3 (Severity Level 2)

2.6.5 Physical Security Team

First Notify Physical Security Team at Escalation to Priority Level 3 (Severity Level 2)

3. INCIDENT RESPONSE PROCEDURE

There are defined actions for the operational aspects of cyber incident response. Considerations should be given to specific incident-handling procedures and described in detail. The internal procedures are intended to facilitate the appropriate assessment of an Information Security Incident and provide required resources for incident response based on the priority rating of the incident.

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

4. COMMUNICATION

Timely, relevant and authentic communication during an incident is critical to the resolution of the incident. The procedure outlined below is based on the Corporate Response Plan and must be observed for the duration of the CIRP. For further explanation, please reference the Corporate Response Plan.

5. INCIDENT RESPONSE PLAN TESTING

This CIRP should be tested periodically to ensure employees involved are aware of CNP environment. The I.T. Corporate Technology Security Director is responsible for planning and initiating the testing.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex G

Physical Security Incident Annex

Physical Security Incident Annex

Scope

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 CNP.

For CNP 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.

Section 1: Security Program Structure

100 Use of This Document

A. This document will be issued electronically and made available on the Corporate Security page of CNP Today Intranet for access by employees and contractors.

B. Mandatory items are indicated by the words “shall”, “will”, or “must”. Recommended items or practices are indicated by the word “should”.

101 Security Information Governance Council (SIGC) Responsibilities

The Security Governance Council (SIGC) is responsible for helping to develop and maintain security policies, coordinate compliance with the policies, and assist individual business units and functional groups with mitigating potential security risks.

102 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.

103 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.

104 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.

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.)

Section 2: Protection of People and Assets

201 Suspicious Persons and Activities

A. All employees should be aware of their work surroundings and report any and all suspicious persons or activities the employee may observe.

B. Suspicious persons or activities could include:

1. Unknown persons or vehicles in the work area.
2. Transients.
3. An employee in an area they do not belong.
4. Persons loitering near company property or work areas.

C. Indicators of suspicious surveillance of the company:

1. Demeanor of the individuals (Do they avoid eye contact?)
2. Do they appear interested in something that is not there or that would not normally hold long periods of interest?
3. Do they appear to be taking measurements with their feet/stride, vehicle (driving a pattern), or using a range finder?

4. 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.
5. Observations of security procedures or staffing positions.
6. Discreet or unusually suspicious use of cameras or video recorders, sketching or note taking, particularly of or about sensitive areas or restricted access points.
7. Unusual or suspicious interest in speaking with building maintenance personnel.
8. Observations of or questions about facility security measures, to include barriers, restricted areas, cameras, and intrusion detection systems.
9. Observations or questions about facility air conditioning, heating, or ventilation systems.
10. Attempted or unauthorized access to rooftops or other potentially sensitive areas.

D. 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.

1. Should you observe suspicious persons or activities report it immediately to:
   - Your supervisor.
   - Corporate Security.
2. Call 911 immediately if a crime is occurring or the situation appears dangerous or threatening.

202 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.

A. 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.

B. 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.

C. Employees should be 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."

D. 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.

203 Trespassers

A. Trespassers are not permitted on company property.

B. If trespassers are found upon company property, take the following actions.

1. If your facility has a security officer, notify the security officer immediately so the person(s) can be removed.
2. If no security officer is at your facility, then notify your supervisor or building management.
3. If you feel safe to do 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.
4. When the police arrive they will ask you if you want to trespass the person. 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.

Section 3: Physical Security Support to EOP for Non-Security Related Activations

301 Staging Site Security

Corporate Security coordinates staffing assignments for security guards and off-duty law enforcement to secure crew staging sites. Corporate Security also oversees the work of security coordinators assigned to staging sites.

302 Crew Security

Corporate Security coordinates the assignment of off duty law enforcement and/or security guards, as requested by business unit leadership.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex H

Mobile Generation/Long Lead Time Facilities Annex

Temporary Mobile Generation

As a result of amendments to PURA in the 2021 Texas Legislative session, TDUs may lease and operate facilities for temporary emergency electric energy to aid in restoration for distribution level customers during "a widespread power outage" (defined as an event that results in a loss of electric power that (A) affects a significant number of distribution customers of a transmission and distribution utility and (B) has lasted or is expected to last for at least eight hours, and is a risk to public safety) in which load shed has been ordered or the TDU's distribution facilities are not being fully served by the bulk power system under normal operations.[1]

In accordance with applicable statutes,[2] CEHE has entered into a lease agreement with a mobile generation provider to secure emergency back-up generation capacity, with the lease agreement ending on June 30, 2029. This lease agreement also extended the lease term for certain temporary mobile generation units that CEHE had previously leased under a short-term lease agreement. CEHE has leased up to approximately 500 MW of temporary mobile generation units, with actual output depending on ambient and other operating conditions. CEHE has the following temporary mobile generation units to deploy, if necessary:

- Up to fifteen (15) mobile gas turbine generator sets capable of providing approximately 30 MW or more of power each depending on ambient and other operating conditions.
- Up to five (5) mobile gas turbine generator sets capable of providing approximately 5 MW or more of power each depending on ambient and other operating conditions.
- Appropriate support resources within prescribed times to transport and operate the equipment.
- CEHE expects to be able to operate the equipment until either the deactivation of the EOP or until affected customers are eligible to receive service (i.e. the statutory requirements are no longer met). Depending upon storm severity, this could range from 1-6+ weeks.

[1] Public Utility Regulatory Act, Tex. Util. Code §§ 39.918 ("PURA")
[2] *Id.*

Finally, based on system needs, and in coordination with appropriate government officials and regulators, CEHE will determine the potential location(s) where the back-up mobile generation facilities will 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 EOP event.[3] Some back-up mobile generation facilities listed above have been pre-positioned at certain locations in CEHE's service area. Under the long-term lease agreement, the mobile generation provider must provide transportation and assembly services if mobile generation facilities need to be relocated. CEHE will coordinate with the mobile generation provider in the event that the pre-positioned mobile generation facilities need to be relocated to other locations in CEHE's service area during an EOP event as operating conditions, road conditions, and other safety considerations permit.

CEHE's operation of back-up mobile generation facilities during an EOP event is not a guarantee against fluctuations, irregularities, or interruptions in delivery service. CEHE's operation of back-up mobile generation facilities is 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.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

[3] PURA §§ 39.918 (g)

Long Lead Time Facilities

The Texas legislature amended the Public Utility Regulatory Act, adding § 39.918 Utility Facilities for Power Restoration After Widespread Power Outage. As a part of this statutory revision subsection (b)(2) addressed the need for transmission and distribution utilities ("TDUs") to have long-lead time facilities.

The statute authorizes TDUs to take proactive measures to ensure they have the facilities necessary to aid in restoring service to customers following a widespread power outage, which is defined in the statute as an event that results in a loss of electric power that affects a significant number of TDU distribution customers and has lasted or is expected to last for at least eight hours and is a risk to public safety. Subsection (b)(2) specifically permits a TDU to "procure, own, and operate…transmission and distribution facilities that have a lead time of at least six months and would aid in restoring power to the utility's distribution customers following a widespread power outage." The statute further excludes from long-lead time facilities electric energy storage equipment or facilities under Chapter 35 of the Utilities Code. Subsection (h) states the "commission shall permit" a TDU that "procures, owns and operates facilities under Subsection (b)(2) to recover the reasonable and necessary costs of procuring, owning, and operating the facilities, using the rate of return" from the TDU's last base rate proceeding. Based on the statute, long-lead time facilities are those that take at least six months to acquire and would be used to restore power after a widespread outage.

The Company interpreted Sec. 39.918(a) to apply to any widespread power outages resulting from several natural or man-made causes, including, but not limited to: tornados, hurricanes, microbursts, flooding, extreme heat/cold, fire events, or an intentional attack on the electric grid e.g., terrorist events, cyber-attacks. Given this statutory language, the Company undertook an evaluation to identify the facilities that are critical to restoring electric service following widespread power outages with a lead time of at least six months.

As a result of this regulation, the Company has added a specific long lead time facility (LLTF) designation for qualifying material items. Materials items are reviewed monthly to validate the long lead time and widespread power outage criteria are met. When both criteria are met, the material item is determined to be a qualifying LLTF material item and are designated as such.

PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § §	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

CENTERPOINT ENERGY HOUSTON ELECTRIC

~~APRIL 18~~MARCH 15, 202~~3~~2

Version 1.~~0~~1

TABLE OF CONTENTS

Purpose and Scope

The purpose of this manual is to show how CenterPoint Energy Houston Electric, LLC (CEHE and/or the Company) prepares for, responds to, and recovers from events that require the activation of the Emergency Operations Plan.

Section A: Overview

A.1 Comprehensive Summary

A.1.2 Introduction

CEHE provides an essential public service that vitally affects the health, safety, comfort, and general well-being of the people living in the area served by the Company. The goal of the Company's Emergency Operations Plan (EOP) is to prepare for, mitigate against, respond to and recover from impacts from a potential hazard and safely restore service to our customers as safely, quickly, and efficiently as possible.

This EOP is written to support response plans to multiple different events including (but not limited to):

- Hurricane
- Winter Storm
- Severe Thunderstorm
- Pandemic
- Wildfire
- ERCOT Load Shed Event
- Heat/Cold Emergency

A.1.3 Goal

Consistent with the Public Utility Commission of Texas (PUCT) regulatory rules, industry practice, and state and local governments' interests, the primary goal of this EOP is the safe and orderly repair and restoration of the Company's electric service facilities after a weather-

related or other emergency event, so that public health and safety are protected, and service is restored to all customers in the minimum amount of time through the proper, safe and efficient use of all resources. The Company's goal is to safely restore the greatest number of customers in the least amount of time.

Experience has shown that the following factors are critical to successfully achieving this goal: extensive planning, training and exercises, adherence to established processes, and execution that can be scaled quickly to respond to and recover from the emergency situation. This plan provides a basic framework describing who does what and when and is flexible depending on the needs dictated by the emergency.

A.1.4 Safety Practices within EOP

All departments and organizations have standard operating and safety procedures that are well-practiced and adopted for their unique operating area and services. The EOP and Incident Command System (ICS) principles are intended to enhance, not replace, existing procedures. Each area involved in a response should integrate its standard operating and safety procedures as needed into their ICS roles as appropriate. It is important to review how conditions change during specific emergencies—fire, flood, hurricane, earthquake, tornado, hot/cold weather, etc.—and expand traditional safety procedures for any situation if needed.

Every response includes a Safety Officer who is tasked with developing the safety plan specific to the emergency and providing briefing and training to appropriate personnel. In a multi-jurisdictional or multi-discipline response, several organizations may have to contribute their safety procedures to the overall safety plan and agree to resolve any inconsistencies. Having a common safety environment for all responders will contribute to a safe and efficient response and make safety monitoring / observations consistent throughout the response area. In the absence of a formal "site safety plan" for the emergency response, departments should maintain their existing safety procedures as applicable to their response activities. If unknown hazards are encountered, or hazards are present for which safety procedures have not been developed, personnel should stop activities until adequate safety measures can be established.

A.1.5 Key Components of CNP's Plan

Key components of the EOP for the Company are the following:

- Disaster response guidelines
- Overview and use of the Incident Command System (ICS)
- Communication and notification plan for employees, customers, community leaders, emergency operation centers and regulators
- A centralized incident command center with an organization for command and control of emergency response teams
- Systems necessary to support outage management procedures and customer communications

A.1.6 Authorities and References: The Public Utility Commission of Texas Substantive Rules – Chapter 25

The PUCT adopted new P.U.C. Subst. R. §25.53 on February 25, 2022, which requires that each utility file an emergency operations plan (EOP) and executive summary under this section by ~~April 18, 2022~~March 15th of each calendar year. A complete, unredacted copy of this plan is available at the Company's main office for inspection by the PUCT or its staff. The rule is provided at the link below.

https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.53.pdf

A.1.7 Approval and Implementation

The Company's emergency operations plan and accompanying annexes are maintained and revised as needed by multiple departments within the organization. The combined document is ultimately reviewed and approved by the Senior Vice President Houston Electric and Senior Vice President and Deputy General Counsel.

Revision Control Summary

Date of Change	Version Number
April 18 2022	1.0
March 15, 2023	1.1

EOP Version 1.1~~0~~, was approved by the entity on ~~April 18, 2022~~March 15, 2023, and supersedes any previous EOP document.

A.1.8 Activation of Plan

Introduction

This plan provides a framework for the activation of the EOP. Events that may cause disruption to the area's electric service are varied and unpredictable as to severity and portion of the system affected.

In order 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.

Electric Operations leadership, or authorized designees, shall have the following responsibilities:

- Activating the EOP when a system-wide storm emergency situation exists or a threat is imminent
- Directing all operations once the EOP is activated
- Keeping the President and Chief Executive Officer of CNP informed of system conditions, activities, and progress towards restoration of electric power under the EOP

Activation Alerts

The Company has a three-level alert system for weather and system conditions which are used in operations and are not exclusive to a hurricane, storm, weather related or other event. These three EOP levels are designed to ensure sufficient resources are available to effectively respond to any type of event impacting CEHE's service territory. The Company has implemented a tiered approach to Emergency Operations and utilizes three levels of the Emergency Operations Plan. The following is a summary of the alert levels that may be activated, based on the needs, during a specific type of event:

EOP Level 1:

- Short duration or low impact event affecting the entire CEHE service territory
- Severe impacts to only a specific area of the CEHE service territory
- Additional support roles may be needed

EOP Level 2:

- Medium duration and impact event

- Severe impacts to multiple areas of the CEHE service territory
- Additional support roles needed

EOP Level 3:

- High duration and impact event
- Severe impacts to all or nearly all areas of the CEHE service territory
- All support roles needed unless otherwise notified
- Individual department emergency plans and/or business continuity plans initiated as needed

Regardless of the EOP level declared, employees must be prepared to respond. Employees should connect with their supervisor and know their EOP role if any level of EOP is declared. If necessary and called upon, management is encouraged to release their employees from their normal responsibilities to assist in the EOP response. Since emergency events can change quickly, employees should be prepared to escalate response if necessary.

Employees who have an electric storm assignment that requires participation in any drills will be contacted by their EOP storm response leader and provided with instructions on where to report. For those who do not currently have a role, the EOP team will make assignments after determining where assistance is most needed.

Hazard specific response plans in the Annex of this Emergency Operations Plan identify specific activations triggers, authorities, and levels of activation depending on the specific response.

Section B: Communications Plan

A. INTRODUCTION

A critical component of the Company's response to any emergency is the communication of timely and accurate information to employees, customers, government officials, and other stakeholders. The primary objectives of the EOP 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 employees, management, the general public, governmental officials, and other key stakeholders through traditional and social media.

The EOP Communications Plan is designed to achieve the Company's communications objectives and may be implemented at the discretion of the Public Information Officer. The EOP Communications Plan consists of, but is not limited to, the following functions:

- Public Information Officer
    - Maintain the Company's credibility and reputation
    - Execution of key decisions and deliverables
    - Identification of appropriate communication channels during the event
    - After-action review to identify areas of plan enhancement
- Media Relations (Public Communications Manager)
    - Write news releases with safety tips
    - Hold news conferences, as necessary
    - Monitor news coverage
- Customer Communications (Director, Marketing)
    - Web Communications (Digital Channel Manager)
        - Web updates
        - Advertising support
        - Power Alert Service
        - Email communications

        - Outbound customer phone calls
- Social Media (Marketing Creative and Brand Manager)
    - Monitor social media and public sentiment
    - Provide social media updates
    - Receive field reports from Crew Spokesperson Leads for neighborhood-level updates
    - Direct photography and video
    - Enable and manage employee ambassadors
- Customer Sentiment, Analytics and Reporting (Market Research Manager)
    - Conduct and analyze Voice of the Customer surveys for Contact Center, Social Media, and Web
    - Collect data from channels and prepare executive reports
    - Conduct post-event surveys as needed
- Employee Communications and Documentation (Employee Communications Manager)
    - Newsletters, intranet, digital signs
    - Setup and update Employee storm hotline, if necessary
- Customer Service (Customer Service Liaison Manager)
    - Liaison to Customer Service and Regulatory, including government liaisons
    - Respond to customer service requests on social media (Customer Experience Resolution Team (CERT) and OCS as needed)
- Crew Spokespersons (Crew Spokespersons Branch Director)
    - Liaison with the general public while crews perform restoration activities
    - Provide field reports to Web/Social Media Channel Branch
- Regulatory, Government Liaison (Director, Government Policy)
    - Communicate with county, state, regulatory and City of Houston officials

Although a team under the Public Information Officer will be organized and charged with performing specialized tasks during the emergency, everyone may be called upon to assume extra duties and responsibilities, including Minnesota and Indiana communications staff, as part of the overall team effort. Marketing will work in conjunction with Corporate Communications.

The Company maintains a 24-hour Call Center for customer service, so customer service personnel are available in the event of an emergency. To supplement these personnel during an emergency, the Manager of the Call Center may implement call-out procedures. At that time, additional personnel report to the call center. If necessary, other Company personnel designated for telephone duty will be notified to report to their temporary work assignment. The Company, during major storms, may activate a third-party High-Volume Call Answering system (HVCA) that can handle the maximum number of calls received. The HVCA system allows customers to report outages and generate an outage report to the Company's crews. The Manager of the Call Center works to adequately staff telephones until the emergency situation has ended.

B. PRE-EVENT PROCEDURES

The Company strives to provide prompt notification about potential or actual events to the public through regular news releases and media advisories on current emergency status and restoration activities. This information is distributed to the media through multiple communication channels and posted on the Internet site of CenterPoint Energy, Inc. (CNP). The Public Information Officer arranges news conferences, media interviews, and access to restoration activities for news footage as needed. Collaboration with internal Marketing is also maintained for consistency in messaging to all stakeholders.

The Company maintains liaisons with various first responders and emergency management organizations, as well as third-party assistance agencies and public officials throughout the 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 Department of Energy, the North American Electric Reliability Corporation (NERC), and the Texas Reliability entity, as appropriate.

In the event of an emergency, the communications team would operate at the Incident Command Center or at a designated location. The communications team will operate 24-hours-a-day, or as required until normal schedules can be resumed.

1. 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

2. Public Information Office personnel will be advised to:
   - Pack a bag of personal necessities
   - Bring personal cameras (i.e., smart phone) 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
3. An extended work schedule of up to 16-hour shifts (or longer, if needed) may also be determined at this time; designated team members will be asked to make necessary arrangements to report for duty.
4. 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.
5. Under the guidance of the Public Information Officer, the team also will have the responsibility for communicating to our external customers and the media before an event.
   - In the event of a crisis, contact with the local news media will be established as soon as deemed necessary
   - Pre-written media advisories will be distributed
   - Information on how to track outages and restoration information on demand (e.g., Outage Tracker Web application, Twitter 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, including videos, on the restoration and prioritization process, FAQs, safety tips, etc.
   - Pre-storm advertising to alert the public about the length of potential outages,

safety tips and how to prepare

- CenterPointEnergy.com dark site (Web page to be used in the event main site is unavailable) will be updated and verified ready for use

C. DUTIES DURING EVENT

1. 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.
2. 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 CNP's event. The Public Information Officer or a designated person will approve the information.
    - Information will be collected from Distribution Evaluation (DVAL) and Central Evaluation (CVAL). In a natural gas emergency, information will be collected from the Gas Dispatching
    - 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
3. News conferences may be held, as necessary, at various locations depending on the event and road conditions.
4. Calls, Social Media inquiries, Monitor 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 .

5. 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 ICC and emergency management personnel, commiserate 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 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. This information will be vetted by Safety and Legal as needed before posting online.

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.

6. 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

D. POST-EVENT DUTIES – RETURN TO NORMAL OPERATIONS

When the Incident Commander determines that an emergency has ended, and the Public Information Officer (or designated person) will announce a return to normal operations. The team will notify Company departments, government offices and other appropriate stakeholders that communications with the Company can now be conducted through normal channels.

1. Critique Crisis Communication Plan Efforts. As soon as possible after the event, the team will analyze the effectiveness of their efforts and recommend improvements in the process.
2. Maintain Historical Record of Event. In conjunction with the Legal Department, the team will develop a historical record of the emergency. This record will include an event chronology, media advisories and news releases, media coverage, internal communications coverage and a summary report describing the event and CNP's response.

At the conclusion of the incident, and in coordination with Emergency Operations, the Incident Command team, and the Corporate Response Plan Team (when applicable), the Communications team participates in a thorough after-action review to identify areas of plan enhancement. Any necessary updates to the communication plan, policies and procedures are completed, along with necessary training to impacted functions for alignment on plan enhancements.

Section C: ICS Implementation

The purpose of this section is to describe the operational organization utilized to respond to an EOP event and outline the various roles and responsibilities related to the EOP response. This section provides information on:

- The Incident Command System (ICS) and its utilization by the Company during an EOP event
- The ICS Planning Process as implemented by the Company

C.1 Introduction to ICS at CNP

Introduction
This section provides an overview of the ICS and describes the manner in which departmental staff utilizes ICS to plan for, respond to, and recover from an EOP event.

History
ICS, a component of the National Incident Management System (NIMS), is a fundamental element of incident management which provides standardization through the use of common terminology and a scalable organizational structure. The ICS process and structure establishes clear roles and responsibilities and provides a process for aligning and documenting activities and information across organizations and departments. The Incident Command System (ICS) is a widely applicable management system designed to enable effective and efficientincident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. ICS is normally structured to facilitate activities in five major functional areas: command, operations, planning, logistics, finance and administration. At each level of the ICS organization, individuals with primary responsibility positions have distinct titles which provide a common standard for all users.

ICS is based on 14 proven management characteristics, each of which contributes to the strength and efficiency of the overall system:

1. Common Terminology

2. Modular Organization
3. Management by Objectives
4. Incident Action Planning
5. Manageable Spans of Control
6. Incident Facilities and Locations
7. Comprehensive Resource Management
8. Integrated Communications
9. Establishment and Transfer of Command
10. Unity of Command and Span of Control
11. Unified Command
12. Dispatch/Deployment
13. Accountability
14. Information and Intelligence Management

C.2 Incident Action Planning (IAP) Process

C.2.1 Summary

In keeping with the NIMS ICS recommended practices, the Company will develop an Incident Action Plan (IAP) to help manage the response. Incident action planning ensures that the Company has a common operating picture when responding to an EOP event. The purpose of developing an IAP is to:

- Help achieve management by objectives
- Synchronize operations at the incident level
- Create an officially approved and documented plan for the next operational period
- Document a common set of objectives for response and recovery
- Ensure incident operations support the objectives

C.2.2 Introduction to Incident Action Planning at CNP

Incident action planning provides a standardized decision-making approach. The Incident Management Team (IMT) will be established for each event and can utilize incident action planning to collect, analyze, and disseminate information in order to create and maintain a common operating picture during the response to an emergency, such as a severe storm event. Incident action planning aligns objectives, resources, and schedules by establishing a single set of objectives and setting a regular frequency (operational period) for planning, communicating, and completing work. In addition, incident action planning provides a process to track objectives, tasks, and resources. The primary planning tool developed during each operational planning cycle is the IAP. An IAP:

- Establishes direction and priorities for operations in the form of overall objectives
- Establishes operational objectives for each IMT function and tracks the progress. I don't recall hearing about IMT before and am not sure how it' fits with the incident comment team, etc.
- Provides for accountability and reduces redundancy
- Provides valuable documentation for After-Action Reports

An IAP is comprised of a series of standard ICS forms that convey the incident status, objectives, work assignments, safety guidelines, and required resources. These forms should be utilized by the IMT, whenever possible. An IAP is produced by the Incident Command Center (ICC) for each operational period. It is approved by the Incident Commander prior to implementation. In general, an IAP will include the following elements:

- Cover page
- Incident objectives and priorities (ICS 202)
- Management structure (ICS 207)
- Kinds and numbers of response resources assigned (ICS 204)
- Medical plan (ICS 206)
- Safety guidelines (ICS 208)

- Daily meeting schedule (ICS 230)
- Tactics summary (ICS 234)
- Other information as required

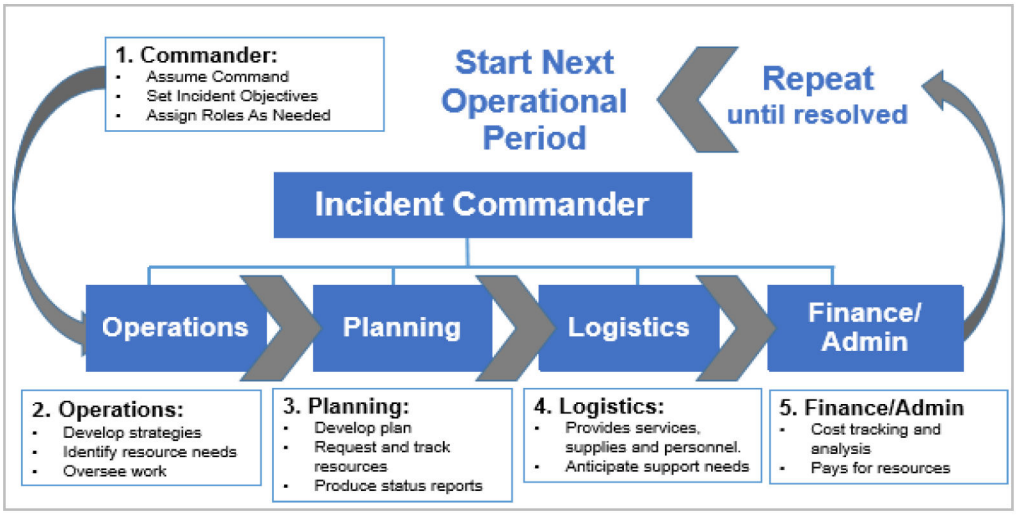
Incident action planning will occur for all events that require the activation of the EOP. However, depending on the event and level of activation, the use of all of the forms listed above is not required. It is the discretion of the Incident Management Team to decide which forms are applicable to the event. Activation of the EOP may also result in the activation of the ICC at the Greenspoint Annex Building, CNP Tower (13th Floor) or any other location the Incident Commander determines would best serve the response.

C.2.3 Correlation to ICS

As described earlier in this Manual, the Company has adopted the Incident Command System (ICS). ICS, a component of the National Incident Management System (NIMS), is a fundamental element of incident management which provides standardization through the use of common terminology and a scalable organizational structure. The ICS process and structure establishes clear roles and responsibilities and provides a process for aligning and documenting activities and information across organizations and departments.

The Company utilizes ICS to manage large-scale incidents. An IAP is developed within the ICS structure to plan CNP's response operations.

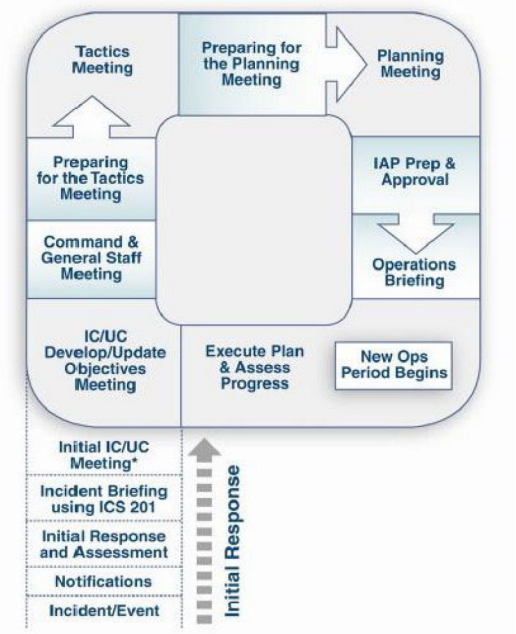
The basic process for Incident Action Planning by ICS role is summarized as follows. Specific requirements and responsibilities will vary by incident.



C.2.4 Operational Planning Cycle/ Planning "P"

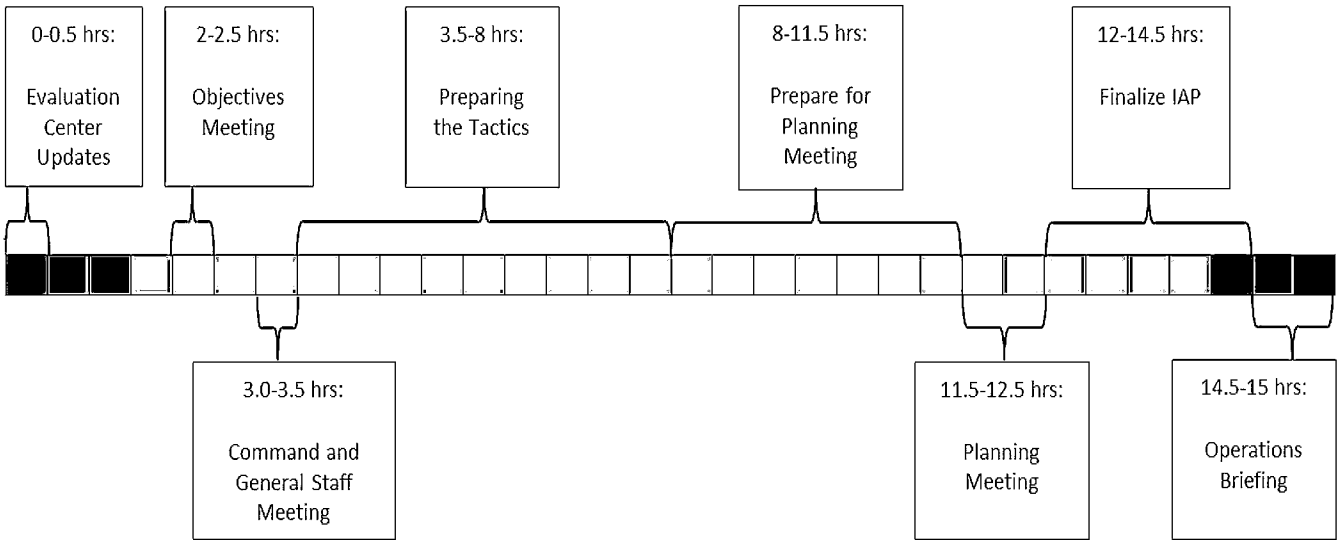
An IAP is developed for each operational period. Incident Action Planning is guided by the Planning "P" (see below).

Operational Period Planning Cycle- "The Planning P"



The Planning "P" is a guide to the process and steps involved in planning for an incident. The leg of the "P" describes the initial response period. Once the incident begins, the steps are Notifications, Initial Response and Assessment, Incident Briefing, and Initial Incident Command/Unified Command Meeting. The top of the leg of the "P" is the beginning of the first operational planning period cycle. The circular sequence outlines the planning meetings and steps that are completed in each operational period in order to develop an IAP. The steps in the circular portion of the Planning P are completed for each operational period until the IMT is demobilized.

The graphic below presents a timeline of the recurring planning meetings and steps and provides a guide as to when these steps should occur during a given 16-hour operational period:



C.2.5 Initial Response and Assessment

Initial Response and Assessment occurs immediately after a disaster or other event is identified and appropriate notifications are made. This initial response could include damage assessments made by the Company post hurricane landfall, outage evaluations post thunderstorm, or system status post cyber-attack. During the initial response to any incident, regardless of incident classification level, the status, incident objectives, and resources needed to effectively and efficiently respond to the incident may be communicated verbally.

Minimally, the following information should be communicated during the initial response period (before the IMT is fully activated and mobilized):

- Individual leading incident response
- Information regarding the threat (storm course, dates, times, and locations)
- Status of the impacts
- Current incident objectives
- Resources needed to meet incident objectives

C.2.6 Evaluation Center Updates

This step provides Operations Branch Directors an opportunity to receive an update on any progress achieved since the end of the previous operational period. It is also where the Branch Director will formally communicate the objectives for the operating period. These objectives were defined and communicated during the previous operational period. If this is the first operational period, this is the opportunity to define initial response objectives. The information collected in these updates will vary by branch, but should include:

- Services or repairs required at Company facilities;
- Initial damage observed;
- Resource status (personnel reporting, fleet, etc.);
- Outages; and
- Current day's actions (1st operational period) or objectives/ tactics (2nd operational period)

A staff member from the Planning Section shall complete the Incident Briefing Form (ICS 201) based on the information provided during the evaluation center updates. The ICS 201 form serves as a permanent record of the situation status as of the start of the operational period.

C.2.7 Incident Brief

This step provides a briefing of the event to the incoming Incident Commander and Command and General Staff early in the current operational period. For CNP, the incident briefing will take the form of a conference call where all evaluation centers submit a verbal situation report to the Incident Commander and the IMT. Safety concerns, initial impact assessments, and actions taken will be conveyed. The Command and General Staff will attend and the Incident Commander, Planning Section Chief or Emergency Operations will facilitate the discussion. Participants include:

- Incident Commander;
- Command Staff;
- General Staff;
- Section Chiefs (Operations, Logistics, Planning, and Finance);
- Applicable Operations Branch Directors (i.e. Distribution Operations, Transmission/Substation, Vegetation Management, Grid and Market Operations, Technology Operations); and
- Major Underground Manager (if applicable for the response).
- Other functional and support leaders as appropriate

A staff member from the Planning Section shall complete the Incident Briefing Form (ICS 201) based on the information provided during the incident briefing conference call.

C.2.7.1 Meeting Details

In preparation for the Incident Brief, a quiet space shall be reserved, and any maps or other materials needed to assist with situational awareness (e.g. damage assessment information) shall be made available to meeting participants.

When:	Before Objectives Meeting
Attendees:	Incident Commander Command and General Staff Branch Directors
Facilitator:	Planning Section Chief
Tasks:	<u>Incident Commander</u> • Provides direction/guidance/clarification • Provides leadership presence and motivation <u>Operations Section Chief and Branch Directors</u> • Provide an update on current operations <u>Technology Operations Officer</u> • Provide an update on current operations <u>Planning Section Chief</u> • Facilitates the meeting • Resolves questions • Records action items as required • Updates on resource status <u>Logistics Section Chief</u> • Briefs transportation, communication, and supply issues <u>Safety Officer</u> • Provides a safety briefing • Other functional and support reports as appropriate
Outcomes:	• ICS 201 – Incident Brief

C.2.8 Objectives Meeting

The purpose of the Objectives Meeting is to establish incident objectives for the next operational period. Incident objectives shall be specific, measurable, action-oriented, realistic, and time-sensitive (SMART). Incident objectives are established based on the following priorities:

- Safety (workforce, public, etc.).
- Incident stabilization and/or restoration of operations and services
- Property preservation

In addition to establishing incident objectives during the Objectives Meeting, the Incident Commander may also set response priorities, identify any limitations and constraints, and develop guidelines for the IMT to follow. Products (ICS forms and other documentation) resulting from the Objectives Meeting will be presented at the Command and General Staff meeting. For recurring meetings (Objective Meetings in subsequent operational periods), products from the previous Objectives Meeting will be reviewed and updated as needed.

The initial Objectives Meeting shall be held as soon as reasonably possible after the IMT (including the ICC and evaluation centers) are able to convene and/or at the direction of the Incident Commander. The Objectives Meeting and the Command and General Staff Meeting may be combined if practical. The duration of the Objectives Meeting should not exceed 30 minutes.

C.2.8.1 Meeting Details

In preparation for the Objectives Meeting, a quiet space shall be reserved and any maps or other materials needed to assist with situational awareness (e.g. damage assessment information) shall be made available to meeting participants.

When:	**Before Command Staff Meeting**
Attendees:	**Incident Commander** **Command Officers and General Staff Section Chiefs** **Situation Planning Branch Director**
Facilitator:	**Incident Commander or Planning Section Chief**
Tasks:	**Incident Commander** • **Develop incident objectives and command emphasis (ICS 202)** • **Develop tasks for Command and General Staff in response to open items (ICS 233)** **Planning Section Chief** • **Facilitate and document meeting** • **Propose draft objectives to Command**
Outcomes:	• **ICS 202 - Incident Objectives** • **Updated ICS 233 – Incident Open Action Tracker**

C.2.9 Command and General Staff Meeting

The Command and General Staff Meeting is an opportunity for the Incident Commander to meet with the Command and General Staff and Branch Directors to present their decisions and management direction. The Command and General Staff Meeting clarifies and helps to ensure understanding among the leadership on the decisions, objectives, and priorities determined by the Incident Commander. In addition to the information provided by the Incident Commander, the Operations Section Chief, Planning Section Chief, and Situation Planning Branch Director may also provide situation updates.

The Command and General Staff Meeting shall be held immediately following the Objectives Meeting. The duration of the Command and General Staff Meeting should not exceed 30 minutes.

C.2.9.1 Meeting Details

In preparation for the Command and General Staff Meeting, the facilitator shall review the meeting agenda, current IAP (ICS 201 or IAP from previous operational period), status information, and the upcoming operational period's objectives.

When:	**Following the Objectives Meeting and prior to Preparing the Tactics**
Attendees:	**Incident Commander** **Command and General Staff** **Branch Directors**
Facilitator:	**Planning Section Chief**
Tasks:	**<u>Incident Commander</u>** • **Review status of open actions, work assignments (tasks) from previous meeting (ICS 233).** • **Present objectives for the upcoming operational period.** **<u>Operations Section Chief</u>** • **Provide update on current operations.** **<u>Planning Section Chief</u>** • **Facilitate meeting.** • **Facilitate discussion on proposed objectives.** **<u>Situation Planning Branch Director</u>** • **Remind staff to begin preparing tactics.** **<u>Status Documentation Branch Director</u>** • **Document meeting and distribute meeting materials.** • Other function and support reports as appropriate
Outcomes:	• **Updated ICS 202 - Incident Objectives, if necessary** • **Updated ICS 233 - Incident Open Action Tracker, if necessary**

C.2.10 Preparing the Tactics

This is a period of time where strategies and tactics are developed for later discussion and review at the Planning Meeting. In particular, the Operations Branch Directors and Planning Liaisons will review incident objectives (ICS 202) to determine responsibilities of the Operations Branch Directors and consider Command priorities. The Operations Branch Directors will then work with his/her Section Chiefs and Coordinating Staff to develop strategies and tactics to meet the incident objectives. Additionally, the Safety Officer will evaluate and plan for potential safety hazards.

C.2.10.1 Details

The Operation Branch Directors, with support from their Planning Liaisons and Coordinating Staff, must determine the strategies and tactics required to accomplish the Incident Commander's objectives. The ICS 234 Tactics Worksheet will be used to work through and document this process. Also, the Planning Liaisons shall ensure that the material, information, and resources that will be presented at the Planning Meeting are organized and accurate. The time allocated for the preparation of tactics will vary depending on the incident and stage of the response. For example, a large-scale Hurricane, Storm or Ice response with 16-hour IMT work shifts, longer time periods maybe allocated for this activity. Other events should adjust this planning time accordingly.

When:	**Following the Command and General Staff Meeting and prior to the preparing for the Planning Meeting**
Participants:	**Operation Branch Directors** **Planning Liaison** **Logistics Liaison** **Safety Officer** **Technical Specialists, as needed**
Facilitator:	**Planning Liaison**

Tasks:	<u>Operations Branch Directors and supporting staff</u> • Develop draft strategies and tactics for incident objectives (ICS 234) <u>Planning Liaisons</u> • Synthesize information to prepare for the Planning Meeting • Provide information regarding resource status to the Operations Branch Directors <u>Logistics Liaisons</u> • Provide information regarding the status of available materials and supplies to the Operations Branch Directors
Outcomes:	• ICS 234 - Tactics Worksheet
Reports due from:	• Major Underground • Incident Command • Transmission/Substation • Technology Operations • Distribution • Additional Areas as required

C.2.11 Prepare for Planning Meeting

This is a period of time whereby the Command and General Staffs prepare for the upcoming Planning Meeting. As such, all draft strategies and tactics developed to accomplish the incident objectives for the next operational period will need to be completed.

C.2.11.1 Preparation Details

Prior to the Planning Meeting, the Command and General Staff will need to work together to prepare for the Planning Meeting. The Planning Section Chief shall facilitate/support the preparations for the Planning Meeting. The Planning Section Chief also ensures the material, information, and resources used or discussed in the Planning Meeting are completed and ready for presentation during the meeting. Concurrently, the Operations Section Chief will prepare a final draft of the ICS 234, based on input from the Preparing the Tactics, operations updates, and coordination with the Planning Section, as needed.

For the beginning of a large-scale response with 16-hour IMT shifts, 3.5 hours is allocated for this activity. Adjust this time accordingly for other responses with shorter operational periods.

When:	**Following the Preparing the Tactics and prior to the Planning Meeting**
Participants:	**Command Staff** **General Staff** **Technical Specialists, as needed**
Facilitator:	**Planning Section Chief**

Tasks:	**PREPARATION FOR PLANNING MEETING** **Incident Commander** • **Prepare further guidance/clarification** • **As needed, meet informally with appropriate staff members** **Operations Section Chief** • **Prepare operations update** • **Prepare final draft of the Tactics Worksheet (ICS 234)** • **Coordinate with other staff as needed.** **Situation Planning Branch Director** • **Prepare final draft of the Incident Objectives (ICS 202)** • **Prepare final draft of the Incident Organization Chart (ICS 207)** • **Prepare final draft of the Daily Meeting Schedule (ICS 230)** • **Assist with final draft of the Tactics Worksheet (ICS 234)** **Logistics Section Chief** • **Consider support requirements to support IAP** • **Verify support requirements** **Resource Acquisition / Resource Unit Branch Directors** • **Prepare final draft of Resource Summary (ICS 204)** **Safety Officer** • **Prepare final draft of the Medical Plan (ICS 206)**
	• **Prepare final draft of the Safety Plan (ICS 208)**
Outcomes:	• **Final drafts of:** ○ **ICS 202 – Incident Objectives** ○ **ICS 204 – Resource Summary** ○ **ICS 206 – Medical Plan**

	○ **ICS 207 – Incident Organization Chart** ○ **ICS 208 – Safety Plan** ○ **ICS 230 – Daily Meeting Schedule** ○ **ICS 234 – Tactics Worksheet**

C.2.12 Planning Meeting

The Planning Meeting is the culmination of all meetings that have taken place prior to this meeting. The Planning Meeting provides the opportunity for the Incident Commander, Command Staff, and General Staff to review and validate the proposed tactical plan to achieve the Incident Commander's direction, priorities, and objectives.

The Operations Section Chief will present the tactical plan that was developed to meet the Incident Commander's objectives, including proposed resources, and support requirements. In turn, attendees will review and provide feedback on the proposed plan.

The Planning Meeting provides the opportunity for Command and General Staff to discuss and resolve any issues and concerns prior to assembling the IAP. After the review is complete and updates are made, the attendees commit to support the plan. The final IAP is compiled following the Planning Meeting.

The duration of the Planning Meeting should not exceed 1 hour.

C.2.12.1 Meeting Details

When:	Following the Preparing of Tactics and preparations for the Planning Meeting
Attendees:	Incident Commander Command Staff General Staff Situation Planning Branch Director Resource Acquisition Branch Director

	Status Documentation Branch Director Technical Specialists, as needed
Facilitator:	Planning Section Chief
Tasks:	<u>Incident Commander</u> • Ensure all direction, priorities, and objectives have been met • Provide further direction and resolve differences as needed • Give approval of proposed IAP <u>Operations Section Chief</u> • Present an operations update
	• Present plan of action <u>Planning Section Chief</u> • Facilitate meeting • Facilitate discussion on the proposed plan • Record action items <u>Resource Acquisition / Resource Unit Branch Director</u> • Present resource status <u>Status Documentation Branch Director</u> • Document meeting
Outcomes:	• Final Incident Action Plan: ○ ICS 202 – Incident Objectives ○ ICS 204 – Resource Summary ○ ICS 206 – Medical Plan ○ ICS 207 – Incident Organization Chart ○ ICS 208 – Safety Plan ○ ICS 230 – Daily Meeting Schedule ○ ICS 234 – Tactics Worksheet

C.2.13 IAP Preparation and Approval

Following the Planning Meeting, IMT members must complete the assigned tasks/products that are required for inclusion in the IAP. IMT members must meet the deadlines set by the Planning Section Chief so that the Planning Section has requisite time to assemble the IAP components.

C.2.13.1 IAP Preparation and Approval Process Information

When:	Immediately following the Planning Meeting
Facilitator:	Planning Section Chief
Tasks:	Incident Commander • Reviews, approves, and signs IAP Operations Section Chief • Provides required information for inclusion in the IAP • Works with the Planning Section to ensure the organizational chart and ICS 204s are complete Planning Section Chief • Reviews IAP for completeness • Provides completed IAP to Incident Commander for review/approval Status Documentation Branch Director • Facilitates gathering of required documents and assembles IAP • Distributes IAP to the appropriate parties and files the original Logistics Section Chief • Reviews Logistics Section products for completeness • Provides logistics information for the IAP • Verifies resources ordered status Finance/Admin Section Chief • Verifies financial and administrative requirements for the IAP

IAP Components	Form	Final Responsibility to Complete
	Cover Page	Planning Section Chief
	ICS 202: Incident Objectives	Planning Section Chief
	ICS 204: Field Assignment List	Resource Unit Branch Director, in coordination with the Resource Acquisition Branch Director
	ICS 206: Medical Plan	Safety Officer
	ICS 207: Incident Organization Chart	Situation Planning Branch Director
	ICS 208: Safety Message	Safety Officer
	ICS 230: Daily Meeting Schedule	Situation Planning Branch Director
	ICS 234: Tactics Worksheet	Operations Section Chief, in coordination with Planning Section

C.2.14 Operations Briefing

The Operations Briefing is conducted at the end of each operational period. At the Operations Briefing, the IAP is presented to supervisors of tactical resources. During the Operations Briefing, the Operations Section Chief briefs the organization and provides clarification regarding any of the tactical assignments. Command and General Staff provide information regarding other key information as necessary. The Operations Briefing shall be 30 minutes or less in duration.

C.2.14.1 Meeting Details

When:	At the start of the next operational period.
Attendees:	Incident Commander Command and General Staff Branch Directors

Facilitator:	Planning Section Chief
Tasks:	Incident Commander • Provides guidance/clarification
	• Provides leadership presence and motivational remarks Safety Officer • Provides a safety briefing Operations Section Chief and Branch Directors • Provide an update on current operations • Provide Operational Briefing for next operational period Planning Section Chief • Set-up briefing area • Facilitates Command and General Staff and attendees briefing responsibilities • Resolves questions • Explains support plans as needed Logistics Section Chief • Briefs transportation, communication, and supply issues Finance/Admin Section Chief • Briefs administrative issues and provides financial report
Outcomes:	The IMT, especially Operations Section Branch Directors, have a clear understanding of the IAP and the incident objectives for the next operational period.

Section D: Organization

D.1 Introduction

The Command, Coordination, and Integrated Communications component of NIMS describes the systems, principles, and structures that provide a standard, national framework for emergency management. Regardless of the size, complexity, or scope of the emergency, effective command, and coordination—using flexible and standard processes and systems—helps safely and efficiently manage the emergency. To ensure that entities with a functional role in emergency management can seamlessly integrate, NIMS encourages common principles, such as terminology, management by objectives, a modular organization, and others to enhance the effectiveness of command, coordination, and communications.

Modular Organization

ICS and Emergency Operations Center (EOC) organizational structures develop in a modular fashion based on an emergency's size, complexity, and hazard environment. Responsibility for establishing and expanding ICS organizations and EOC teams ultimately rests with the IC (or Unified Command (UC)). As emergency complexity or duration increases, organizations expand as the IC / UC, and subordinate supervisors delegate additional functional responsibilities.

The ICS consists of a standard management hierarchical chain of command that expands, and contracts based on the size and needs of emergencies. Through this scalable organization, everyone fulfilling each role has a clear route, if not means, of communications up and down the chain of command and pre-established responsibilities. To maximize resources only positions that are required at the time should be established.

The purpose of this section is to describe the various sections of the ICS organization that could be utilized to respond to an EOP event. This section also outlines the various roles and responsibilities related to the EOP response. This section provides information on:

- Tasks assigned to the five functional areas (Command, Operations, Planning, Logistics and Finance).
- The interrelationship between those functional areas.

ICS Overview

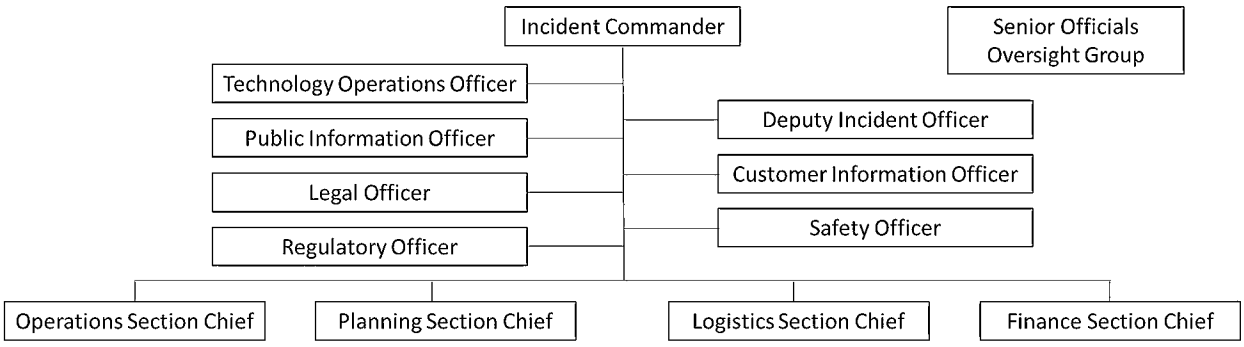
ICS is modular by design and it expands and contracts to fit the incident needs while helping to manage Span of Control (number of resources reporting to any single supervisor). The review of each ICS tool should be deliberate and thoughtful, understanding that ICS is based on a standardized incident management system that has proven to be successful across many disciplines and used across multiple disaster types. Minor modifications are made to fit the mission and resources of the CNP emergency response along with the nature and type of the disaster. Substantial deviation from accepted ICS principles may result in a system that is not recognized by other response partners and could potentially have an adverse impact on the coordination that is necessary during large scale disasters.

Unified Command (UC) UC is an authority structure in which the role of the IC is shared by two or more individuals, each already having authority in a different responding departments. UC is especially helpful for managing events involving multiple departments or business units where the responding organizations and/or areas share responsibility and management for the emergency (Multi-agency Coordination or MAC). If a UC is erected, ICs representing departments or areas that share responsibility for the emergency can manage the emergency response from a single, co-located Incident Command Post.

CNP utilizes the ICS as the baseline for all EOP Response Events. Unified Command may be established at the discretion of the Incident Commander and with the authority of the Senior Oversight Committee/Corporate Response Team (CRPT).

CNP staff members responding to an EOP event are designated as Command Staff or General Staff following the ICS recommended guidelines. The Company's recommended EOP organization of Command Staff and General Staff is below.

CenterPoint Energy Houston Electric EOP ICS Main Structure:



D.1.1 Senior Officials Oversight Group

The Senior Officials Oversight Group or Corporate Response Planning Team, depending on the incident, delegates authority to the Incident Commander. In doing so, they assign the responsibility for all aspects of the restoration effort to the designated Incident Commander. The Senior Official Oversight Group/CRPT has an on-going responsibility to provide policy direction, financial support and strategic direction over the course of the response. They also continuously monitor the situation as an on-going risk assessment to ensure the safety/stability of the company.

D.1.2 Command Staff

Command Staff positions are established to assign responsibility for key activities not specifically identified in the General Staff functional elements. Note that although the Senior Officials Oversight Group is documented on the above ICS Organization Chart, they are not actually a part of Command.

Command Staff positions, a high-level description of their responsibilities and a reference of where to find more detailed information is provided in the table below:

Position	General Responsibilities	Reference
Incident Commander	Provides overall leadership for the incident response, delegates authority to others, establishes incident objectives and directs staff to develop the Incident Action Plan (IAP)	Section D.2.2
Public Information Officer	Interfaces with the public, media, and employees to provide incident-related information. Interfaces with local, state and federal agencies to provide incident-related information and coordinate response efforts	Section D.2.3
Safety Officer	Monitors all safety and environmental procedures	Section D.2.4
Technology Operations Officer	Ensures that systems that are essential for projecting and dealing with a storm's impact are operating in a reliable manner	Section D.2.5

Customer Information Officer	Interfaces directly with customers to gather information and provide incident-related information	Section D.2.6
Regulatory Officer	Provides guidance and discusses regulatory issues impacting the response	Section D.2.7
Legal Officer	Provides guidance and discusses legal issues impacting the response	Section D.2.8

D.1.3 General Staff

General Staff positions are established to assign responsibility for the major functional elements of ICS, including planning, operations, logistics and finance.

General Staff positions, a high-level description of their responsibilities and a reference of where to find more detailed information is provided in the table below:

Position	Responsibilities	Reference
Operations Section Chief	Implements the strategy and tactics and actively pursues the objectives laid out in the Incident Action Plan	Section D.3.2
Planning Section Chief	Ensures the incident response is run in a cohesive and proactive manner	Section D.3.3
Logistics Section Chief	Provides facilities, services and material in support of the incident	Section D.3.4
Finance Section Chief	Coordinates the finance operations for the incident response	Section D.3.5

D.2 Command Staff Section

D.2.1 Summary

The Incident Commander provides overall leadership for the incident response. A Deputy Incident Commander may be assigned as necessary.

The command staff functions are directed by the Incident Commander and are usually responsible for the customer and public information, liaison, safety, legal and technology services aspects of the response. Emergency Operations may also be included in the Command Staff to provide support to response operations. Command staff report directly to the Incident Commander. Command Staff may assign Assistants as necessary.

D.2.2 Incident Commander

Summary

Solely responsible for the emergency effort, including establishing incident objectives and ensuring activities are directed towards accomplishing those objectives. Fulfills role of organizational manager and manages the organization, not the incident.

Responsibilities

The Incident Commander has the following responsibilities:

- Declare activation of the EOP
- Authorize the establishment of the Incident Command Center and identifies the location
- Set the schedule for and conducts periodic briefings and staff meetings with Command and General Staff
- Determine objectives for dealing with the incident
- Authorize the implementation of the IAP
- Help with data or technical assistance needed to support the effort
- Ensure appropriate section chiefs provide plans and reports
- Approve necessary purchases and requests exceeding an established amount
- As necessary, approve the acquisition and release of incident resources
- Approve transfer of command and transition plans
- Reports to the Senior Official Oversight Group, CRPT or other authorities about the status of the incident response
- Approves IAPs

- As necessary, approvals for purchases, acquisition and release of resources and transfer of command and transition plans

D.2.3 Public Information Officer

Summary

The Public Information Officer plays an important role in providing accurate and timely information and projecting the image of incident response before the media, public, governmental officials and employees. The Public Information Officer strives to maintain the company's credibility and reputation. Incident responsibilities include the execution of key decisions and deliverables through advance work preparation, the identification of appropriate communication channels during the event and a robust after-action review to identify areas of plan enhancement.

Responsibilities

The Public Information Officer works directly with the Incident Commander at the Incident Command Center.

The Public Information Officer

- Plans, coordinates, and implements an effective public information program to support the objectives of the IAP through:
  - Media Relations
    - Write news releases with safety tips
    - Conduct and coordinate media interviews and respond to media inquiries
    - Act as primary Company spokesperson and identify subject matter experts most appropriate to speak on behalf of the Company
    - When necessary, hold press conferences with media and local officials
    - Maintain current talking points and FAQs

- Collaborate with legal on approval of all external facing material and mark collateral as appropriate should it be protected
- Monitor social media

- Customer and other external communications
  - Collaborate with Marketing Communication to ensure customer communication channels align with Company position at all stages of event
  - Web updates
  - Inform customer email communication
  - Social media monitoring
  - Power Alert Services (if applicable)
  - Text Notifications
  - Customer bill notifications
  - Advertising support (if applicable)
- Liaison to Customer Service

- Employee communications and documentation
  - Provide real-time updates to employees via email and intranet
  - Direct photography and video needs when necessary
  - Graphics support
  - Assist in setup of storm hotline, if necessary
  - Collaborate with Human Resources to inform on employee assistance needs
  - Collaborate with Corporate Security to inform employees on any security related updates

- Point of Contact for EOCs, Regulatory Agencies and Elected Officials
  - Collaborate with points of contact to maintain listing of all EOC, Regulatory and Elected Officials Liaisons and their assignments
  - Collaborate with members of ICS to monitor incident operations and provide guidance and support to Liaisons as needed
  - Provides real-time information to Liaisons who act as the point of contact for Federal, State and local government representatives, keeping supporting officials aware of the incident status
  - Stays aware of all changes in emergency project operations, policies and plans in order to provide the most current and accurate information
  - Provides information to emergency project personnel, headquarters personnel, industry representatives, elected officials, regulatory agency personnel and others, as necessary
  - Provides training, guidance and talking points as needed, to government liaisons on proper procedures for dealing with the media and onsite customer interests which may impede the work of operations
  - Coordinates and assist emergency project personnel when it is necessary or desirable for them to be interviewed by the media
  - Collects and disseminates information regarding the status of CNP's system(s) to elected officials, regulatory agencies, and emergency management personnel.
- Community Outreach and Humanitarian Assistance Efforts
  - Assess the need for community support and Company's ability to assist, either directly or through the financial contributions to third-party agencies
  - Collaborate with CenterPoint Energy Foundation, and its Board as necessary, to identify available funds for community assistance if appropriate
  - Collaborate with Community Relations to identify opportunities for volunteer, food, basic necessity assistance, as appropriate

- After-Action Review
  - At the conclusion of the incident, and in coordination with the ICS and the CRPT, participate in a thorough after-action review to identify areas of plan enhancement
  - Complete necessary updates/training with impacted functions to ensure alignment on plan enhancements identified
  - Update any policies and procedures as a result of the conclusions obtained in the after-action review

D.2.4 Safety Officer

Role
The Safety Officer monitors incident operations and advises the Incident Commander on all matters relating to operational safety, including the health and safety of CNP EOP personnel.

Responsibilities
The Safety Officer works directly with the Incident Commander at the Incident Command Center.

The Safety Officer has the following responsibilities:

- Addresses all work safety issues and accidents or incidents for the Company and visiting utility and contract crews
- Interfaces between the Company and Safety personnel of visiting utility and contract crews
- Interfaces with state and federal safety entities as the need arises
- Coordinates safety orientations for all mutual assistance crews and all Contract crews before they are allowed to begin working on the CNP system
- Conducts daily safety briefings with internal and external Safety Representatives

- Conducts jobsite inspections of internal and external crews to ensure that safety rules are being followed and good work practices are being used

D.2.5 Technology Operations Officer

Role

The Information Technology Officer provides the most reliable processing of storm-essential and storm-contingent systems to ensure the primary goal of the EOP is met as expeditiously as possible.

Responsibilities

The Information Technology Officer works directly with the Incident Commander at the Incident Command Center.

The Technology Operations Officer has the following responsibilities:

- Conduct pre-storm planning activities to identify critical and contingent systems that must be maintained during an incident
- Develop a structure to support the various systems and functions on a 24-hours basis
- Provide support for the following:
  - Customer Information System
  - Outage Management System, Advanced Distribution Management System and Graphical Switching
  - Enterprise Mobile Data
  - EAI
  - Batch scheduling and mainframe automation
  - Data security
  - Change management
  - Mainframe operations
  - Help desk services (including Desktop Support)

- LAN services
- UNIX services
- Telecommunications and networks
- Digital Design Studio engineering and tools
- Database management
- SAP applications, SAP Basis and databases
- Smart Grid
- Other systems

D.2.6 Customer Information Officer

Role

The Customer Information Officer is the Incident Command's point of contact for members of the public to get information on estimated restoration times and other incident-related matters and to report incident-related information, such as downed power lines.

Responsibilities
The Customer Information Officer works directly with the Incident Commander at the Incident Command Center.

The Customer Information Officer has the following responsibilities:

- Establish and manage all aspects of the telephone call center operations
- Notify Information Systems about when to implement the "Storm Access" Security Profile to allow limited access to anyone called upon to answer customer calls
- If required, request additional resources to handle call volumes
- If needed, activate a third-party High Volume Call Answering System (HVCA) that can handle the maximum number of calls received
- Enter information from customers into the Customer Information System

D.2.7 Regulatory Officer Role

The Regulatory Officer provides guidance and discusses regulatory issues impacting the response.

Responsibilities

- Reviews regulatory requests and directives and support compliance
- Acts as a point of contact for Incident Command regarding regulatory matters
- Establishes appropriate regulatory staffing required to support the incident
- Attends Planning Meetings and is prepared to discuss regulatory issues impacting the response
- Assists with resolving regulatory issues as needed
- Coordinates with Public Information Officer and Regulatory, Government Liaison (Director, Government Policy) on communications with regulatory agencies, public officials, and others
- Provides other regulatory advice, counseling, and guidance as necessary

D.2.8 Legal Officer Role

The Legal Officer provides guidance and discusses legal issues impacting the response.

Responsibilities

- Review authorities and legal directives and ensures compliance
- Acts as a point of contact for Incident Command regarding legal matters
- Establishes appropriate legal staffing required to support the incident
- Attends Planning Meetings and is prepared to discuss legal issues impacting the response
- Reviews and documents Command's legal decisions and directives
- Review agreements and contracts and assists with resolving legal issues as needed
- Helps resolve labor issues

- Review various communications
- Reviews all plans and documentation to ensure compliance with legal mandates
- Works with Claims team to investigate and process third party general liability, auto, and other claims and incidents with potential to become claims or litigation
- Respond to litigation as needed
- Provides other legal advice, counseling, and guidance as necessary

D.3 General Staff Sections

D.3.1 Summary

The General Staff represents and is responsible for the functional aspects of the Incident Command Structure. The Incident Commander activates the Command staff and the other four major functional areas (Sections):

- Operations
- Planning
- Logistics
- Finance

Staffing throughout the Incident Command structure has been pre-determined, reviewed, approved and updated throughout the year as needed, and is maintained through the ESR. However, The Incident Commander has the authority to make additions or reductions to the structure/staffing pending the needs of the response to the event.

D.3.2 Operations Section

The Operations Section identifies, assigns and supervises the resources needed to accomplish the incident objectives.

D.3.2.1.1 Major Underground Summary

Major Underground is responsible for assessing and restoring all 3-phase major underground facilities and reporting on their status. They may also assist with restoration of distribution residential underground (URD) facilities.

Staffing

- Director
- Operations managers, who are responsible for leading the restoration efforts
- Underground restoration personnel (at the Harrisburg Service Center)
- Overhead contract crews, as needed

Inputs

- Information on damaged Major Underground facilities (from SCADA)
- Customer reports through key accounts or customer service
- Information on which Underground Residential Distribution (URD) locating vans with operators and EZ haulers have been delivered to the Harrisburg service center (from Service Centers)
- Information on overhead restoration progress (from Distribution Operations)
- Priority restoration information (from Priority Calls Hot Desk or daily conference calls)
- Premise registry data to help prioritize response effort
- Trouble orders (from Mobile Data)

Tasks

- Inspect key account underground facilities for damage

- Assign and handle trouble orders for Major Underground facilities and residential URD facilities
- Establish the Underground Evaluation Center (at the Harrisburg service center)
- Make sure the Underground Evaluation Center is in contact with other evaluation centers

Outputs

- Daily progress reports (for the Incident Command Center)
- Reports concerning any environmental events (to the Environmental branch of Safety)

D.3.2.1.2 Priority Calls Hot Desk

Summary

The responsibility of the Priority Calls Hot Desk is to receive, document, and track requests from SOC, government liaisons, and internal CNP sources. These requests cover:

- Life safety
- Mobility
- Security
- Environmental
- Other situations

These situations may require an urgent response and resolution, and a follow-up report to inform the Incident Commander and Section Chiefs.

Staffing

Priority Calls Support, depending on the number of shifts

Inputs

- Situation notifications from SOC
- Situation notifications from Government Liaisons
- Situation notification calls transferred from customer service and internal CNP sources
- Information from the Incident Commander and section chiefs on which priority restorations should be performed first (such as decisions to give a higher priority to building supply stores, gas stations, and grocery stores)
- Prioritized list of key account customer outages (from Key Accounts)

Tasks

- Receive new calls from SOC and internal resources, and log the call information into the SharePoint site
- Create a prioritized, daily report of requests
- Receive information on jobs that are completed in the field, and log information into the SharePoint site to close out jobs
- Monitor open jobs for updates and estimated on times
- Create trouble orders in CIS based on direction from Incident Commander

Outputs

- SharePoint information that users can use to check the status of all priority jobs Users will be restricted to sort and view-only access
- Requests for damage estimates (to Primary Metering and Central Metering)
- Prioritized list of restorations requests submitted to Operations branch director
- Status updates to Operations Branch Director and others as needed
- Priority calls (to Service Centers)

D.3.2.2 Transmission and Substation Branch

D.3.2.2.1 Transmission Operations

Summary

Transmission is responsible for:

- Patrolling and identifying damage to Transmission facilities
- Repairing damaged facilities

Staffing

- Transmission Evaluation Center managers
- Helicopter Patrol (10)
- Transmission Restoration Center manager
- Transmission Restoration Center manager administrative assistant
- Engineering personnel
- Material personnel
- Transmission Restoration Center manager
- Outage Coordinator
- Crew Leaders
- Facilities Coordinator
- Ground Patrol
- Contractor Services
- Foreign Crew Coordinators
- Support personnel

Inputs

- Information on circuits that had an outage, either by lockout or instantaneous f
- operation (from RTO)
- Prioritization information for circuits (from RTO)
- Fault recording information (primary from TWS system or calculated faults)
- Which contract/mutual assistance resources will be coming available (from Resource Acquisition)

Tasks

- Compile and evaluating inspection patrol information
- Generate and modify projected restoration dates, based on available crews and materials
- Help with other parts of the restoration process once Transmission facilities have been repaired
- Repair PCS equipment

Outputs

- Daily status reports, including estimated dates for restoration (for the section chief, through the Transmission and Substation Evaluation Center)
- Information on additional crews that are needed or are ready for demobilization (for Resource Acquisition)
- Operational transmission facilities

D 3.2.2.2 RTO

Summary

CNP's Real Time Operations (RTO) is responsible for:

- Monitoring and controlling the switching of transmission lines, substation breakers and distribution breakers (through SCADA, switching orders, clearances, and work tags)
- Coordinating the efforts of various groups (primarily Transmission and Substation) in restoring the Bulk Electric System (BES)
- Providing updates on the status of BES

Staffing

RTO is staffed 24/7 during EOP, with:

- Branch manager (Real Time Operations Director)
- Manager of System Operations
- System Operations Supervisors
- System Controllers
- RTO Support Staff

Inputs

- Requests to have circuits energized/de-energized (from Distribution Control)
- Status of Control Systems' computer systems and communications (from Control Systems)
- Information on the status of the ERCOT system (from ERCOT)
- Weather information (from StormGeo)
- Damage assessments and restoration updates (Transmission, Substation, and Distribution Control)

- Priority call information (from Priority Calls Hot Desk and government liaisons)
- SCADA viability assessments (from Substation)
- Reports of customer statuses (from Transmission Accounts, through the Transmission and Substation Evaluation Centers)
- Lists of Customer Priorities (from Transmission Accounts, through the Transmission and Substation Evaluation Centers)
- Information from various other external sources

Tasks

- Communicate with the following groups as appropriate:
  - Customer Service
  - Corporate Communications
  - Regulatory
  - Substation Performance
  - Transmission Operations
  - Facilities O&M
  - Telecommunications
  - Distribution Control
  - Transmission Accounts
  - Key Accounts
  - Incident command staff
  - Control Systems
- Control all equipment in the BES (by either SCADA or by the issuing of switching orders), including the switching of distribution breakers

- Alert Substation Field Operations when they need to monitor substation equipment if monitoring equipment is not available
- Work with Transmission & Key Accounts and Resources to identify which load and generation facilities may need to be shut down.
- Under the threat of a hurricane or other event that causes a major loss of generation and/or load, evaluate the North Transfer Limits and status of Generation Resources inside CNP's footprint. This comes with the anticipation of exporting energy to the north. The goal of this effort is to prevent islanding or a Blackout condition by supporting the minimum load requirements of generation resources if major loads and/or tie lines are lost.
- Assist with prioritizing restoration
- Synchronize islands if island conditions exist
- Monitor and react to the status of the BES
- Answer Transmission Accounts' enquiries pertaining to the status of Industrial Customers' substations

Outputs

- Authorize requests for feeders to be energized (for Distribution Control)
- Switching orders, clearances, and work tags (for Substation and Transmission)
- Information on the status of the BES, including load (for Electric Market Operations - "EMO")
- Periodic communications about the position and intensity of the storm to CNP personnel, using email and text messaging systems
- Directions to Substation Field Operations personnel
- Inform Distribution Control on any events that are adversely affecting distribution operations, including operations and lockouts
- Update the Outage Reporting System with circuit information

3.2.2.3 Substation Operations

Summary

Substation is responsible for verifying and ensuring the operability of the bulk power grid (with RTO) through:

- Rapidly assessing damage to Substation facilities
- Making necessary repairs to Substation facilities so that those facilities are operating on at least a basic level
- Preparing Substation facilities for re-energization
- Manually operating Substations as directed by RTO

Staffing

- Engineering personnel
- Substation staff (initially at EC/DC, afterwards throughout the service territory):
    - Substation Operations director
    - Substation Operations managers
    - Substation crew leaders (with crews)
    - Outage Coordinators
    - Construction Coordinators
    - SCADA specialists
    - EVAL coordinators
    - EVAL outage monitor
    - EVAL data trackers
- Bargaining Unit field personnel across the CNP system to address core responsibilities
- Engineering personnel (for tasks such as relaying, and handling transformers)

- Non-electrical contractors (such as those who work on cranes or barges, or are specialty movers) for emergency restoration

Inputs

- Equipment and personnel required to perform aerial assessments (conducted in conjunction with Transmission)
- Priority restoration information (from Transmission and the Distribution Evaluation Center)
- Information on which breakers and switches Substation needs to operation manually (from RTO [or Distribution Control])
- Availability of Substation staff
- Status of storm, including information on when it is safe to fly and accessibility to facilities (from RTO)
- Information on accessibility to facilities (from law enforcement)
- Ability to communicate across the system
- Engineering support during the storm
- Work tags (from RTO)

Tasks

Pre-storm

- Prepare Substation facilities to weather the storm, including:
- Making sure the facilities have sufficient backup power
- Removing any debris
- Ensure that Substation has sufficient, operating tools and equipment to begin a successful restoration
- Make sure needed documents are secured
- Transport equipment as needed

- Test Grant substation flood gates and pumps
- Remove Tiki Island mobile substation and transport to the South Houston Complex
- Move standby generator and fuel tank to Morgan's point
- Review synchronization and black plant startup procedures with employees
- Place Crosby and Bellaire "SVC" units into manual mode
- Change Cyber Key reset days to 14

Restoration

- Ensure the safety of the work environment
- Report locked out transmission and distribution circuits
- Manually operate breakers and switches as directed
- Perform detailed inspections of damaged Substation facilities where possible
- Conduct aerial assessments of Substation facilities
- Coordinate contractor services as required
- Ensure that work is performed safely
- Repair equipment
- Release resources to help with other areas of restoration work once Substation facilities have been repaired

Outputs

- Substation availability, operability, and damage assessments (for the Transmission, Distribution, and Substation Evaluation Centers, and RTO)
- SCADA viability assessments (for RTO, through Control Systems)
- Substation loading assessments (if SCADA is not available)
- Equipment and material requests (for Supply Chain)

- Various requests to Shops and Facilities
- Ad-hoc reports for command staff as requested
- Functional substation facilities

Vegetation Management Branch
Staffing

- Branch Director
- Vegetation Management Manager - The Manager is initially embedded in the Resource Acquisition group to support appropriate resource procurement. Once resources are acquired, the Manager will support the Branch Manager in operations restoration. When resources are demobilized, the Manager moves back to Resource Acquisition to aid in demobilization.
- System Foresters - System foresters have dual reporting responsibilities through both the Service Area Directors and the Vegetation Management Manager. They also will also facilitate resolution of VM issues for service area and staging site crews, SCCs, TCCs, customers, and resource constraints as identified.
- Transmission Foresters - Transmission Foresters will coordinate local tree crew service restoration in support of Transmission Operations. Upon completion of transmission system restoration they will act as ad hoc System Foresters in special need areas.
- Vegetation Management Spokesperson (Bellaire & surrounding high profile areas)
- Service Area Tree Crew Coordinators (SCC) (reporting through the Service Area Directors) - The SCCs are assigned to each service center to coordinate local tree crews in support of CNP line crews.
- Tree Crew Coordinators (TCC) - The TCCs are assigned to the staging sites to assist in administration and coordination of foreign tree crews. The TCCs and foreign tree crews will be matched with an FCC and line crews in support of operational objectives as defined by the Service Areas Operations (i.e. Staging Site) Manager. (Desired staffing – about 1 TCC / 7-10 foreign tree crews)

Inputs

- The number of stages sites that will be opened, and when they will be opened (Operations Section Chief)
- The number of resources that will be arriving on the system, and when they will be arriving (from Resource Acquisition)
- Contact information for Service Area Directors, Operations Managers, contractor management, FCCs, SCCs and TCCs
- ICS reporting structure
- Information on available specialized equipment (local and foreign) (from Resource Acquisition)
- Special Vegetation Management objectives (from Operations Section Chief)
- Special tree crew resource needs from HR to support the Employee Assistance branch (tree removals and minor roof repairs)
- Reports or updates from System Foresters

Tasks

- Identify total manpower resources for Vegetation Management, and the time frame for those resources.
- Support the allocation of Vegetation Management resources across staging sites, service centers and Employee Assistance Program.
- Handle mobilization and demobilization of internal and external Vegetation Management resources.
- Specialized global or tactical VM issues resolution as identified during the course of the event.

Outputs

- Requests for specialized equipment (to Resource Acquisition)

- Daily reports for conference calls (to Operations Section Chief)
- Communications concerning Vegetation Management's responses to special Vegetation Management (to Operations Section chief, Resource Acquisition, and other groups that are working on high-priority work that Vegetation Management work is involved with).
- Guidance and feedback to VM Branch Staffing to support foresters' activities.

D.3.2.3 Grid & Market Operations Branch

D.3.2.3.1 Analytics Summary

Analytics is responsible for:

- Providing daily operations support of Situational Awareness (SAGD) for Operations, Telecommunications, IGSD devices and the Security Operations Center (SOC)
- Monitoring all aspects of SAGD and its' supporting systems to ensure timely delivery of
- information essential to support restoration efforts
- Ensuring availability of systems relying on Mobile Data and the ADMS once those systems are reactivated

Staffing

- Analytics Manager (Storm Rider at EC/DC)
- 3 Architects (Day One Responders at EC/DC), two to support Business Warehouse and one to support SAGD and Streams Real time interfaces
- Business Analysts (Day One Responders at CNP Tower if open)

Inputs

- ADMS is operating
- Mobile Data is operating
- DCE is operating
- MDM is operating
- As needed, support resources from Technology Operations including:
  - Database Administrators
  - Network Resources specializing in the telecommunications operation

Tasks

For Operations, Telecommunications, IGSD devices and the SOC:

- Maintain and monitor supporting computer systems (including Business Warehouse) and situational awareness graphical displays
- Availability to fail systems over to the new AOC when available

Outputs

- Effective and functioning systems and situational awareness graphical displays supporting the restoration efforts for Operations, Telecommunications, IGSD devices and the SOC
- Availability to fail systems over to the AOC

D.3.2.3.2 Distribution Control

Summary

Distribution Control is responsible for:

- Providing safe and reliable switching
- Overseeing daily operation of the Distribution grid
- Monitoring all radio communications between field operations and the control room
- Ensuring availability of the Mobile Data system when it is reactivated

Staffing

- Manager of Distribution Control (at EC/DC)

- Control room operation lead (at EC/DC), leading:
  - Regional supervisors (at EC/DC)
  - Floor controllers (at EC/DC, reporting to supervisors)
  - Distribution Controllers (engineers) (at EC/DC)
- ADMS operation lead, leading:
  - Distribution Control Support (technical analysts) (at EC/DC)
  - Mobile Data support (at Service Centers)
  -

Inputs

For control room operations:

- Switching requests (from FCCs, crew leaders, or RTO at Service Centers)
- Prioritization information from the Priority Calls Hot Desk

Tasks

- Execute switching orders as requested
- Maintain and monitor supporting computer systems, dedicated phone lines, and situational awareness graphical displays for DVAL
- Set up equipment required by the Priority Calls Hot Desk
- Communicate distribution operations information to RTO (for opening and closing breakers)
- Manage SOC requests, including:
  - Acting as liaison with SOC to take requests and provide status updates
  - Dispatching field operations personnel to the requested location

Outputs

- Safe and effective switching, including communication concerning actions taken in the field

D3.2.3.3 EMO Summary

EMO is responsible for:

- When any bank in the system cannot transfer funds electronically, communicating with banks and Retail Electric Providers (REPs) to make sure that everyone is clear on how TDSP invoices are going to be paid to CNP
- Notifying the Texas retail market about CNP's EOP plans, and how those market participants will be affected
- Rebuilding data (and synchronizing it with the Texas retail market) after an event as needed

Staffing

- Branch manager
- ERCOT contact manager
- ERCOT manager support staff
- AMS retail market staff
- Competitive retailer communications staff

Inputs

- Which Technology Operations (TO) systems are working, and which are not (along with estimates of when those systems will be restored) (from TO)
- How much load is on the system (RTO)
- Overlay map that details outages by GLN number, and their estimated duration (GIS)
- Forecast of the load that will be on the system the next day
- Notification of demobilization of EMO resources assigned to Distribution (Resource Unit)
- Notification of ad hoc requests including from state regulatory bodies (from government liaison)

- Information on status of BES, load (from RTO)
- Status of AMS data (from AMS)

Tasks

- Upon the designation of force majeure, work with AMS Systems personnel to change a configuration in the MDM thereby allowing readings for switches to be estimated by the MDM.
- Review TMH and CIS exceptions on an ongoing basis, and make corrections as needed
- Write notifications to send to Texas retail market (at least 3 times daily)
- Respond to requests from the retail market
- Validate the status of premises that need to be retired from the ERCOT system
- Enter configurations to stop late charges for REPs whose banks and/or systems are inoperable
- Ensure that the Texas market is as functional as possible without our input (i.e., certification of new REPs)
- Set up retail market conference calls
- Prepare presentations for ERCOT committees and sub-committees as part of the after-action review process
- Releasing EMO resources to the call center as appropriate

Outputs

- Report to PUCT of plans to restore market orders
- Notifications on how the Storm EOP is affecting market orders, system functionality, and customer outages (to Texas retail market)
- Signed certification record for REPs for ERCOT
- Ad hoc reports to regulatory bodies and REPs as requested

- Calls to retail market to provide status updates
- Presentations for ERCOT committees and sub-committees
- EMO resources for call center

D.3.2.4 Gas Liaison Branch Summary

The Gas Liaison is responsible for keeping the Electric side of the business informed as to the status of Gas operations restoration.

Staffing

Gas Liaisons (both at the Incident Command Center at Greenspoint)

Inputs

- Gas restoration information (such as outages, mutual assistance requests, and internal staff that are coming in from other regions) from daily conference calls
- Ad hoc requests for updates and reports
- Priority calls for gas restoration work
- Requests for additional resources (after the gas system has been secured)

Tasks

- Monitor the status of restoration efforts, including outages and staff augmentation
- Respond to requests for additional resources

Outputs

- Requests to gas field operations to check on the status of specific gas facility restoration work

- Communications back to requestors as to the status of specific gas facility restoration work
- Gas resources for helping on the Electric side of the business

D.3.3 Planning Section

D.3.3.1 Summary

The Planning Section collects, evaluates and disseminates incident situation information and intelligence to the Incident Commander and incident management personnel. This Section then prepares status reports, displays situation information, maintains the status of resources assigned to the incident and prepares and documents the IAP, based on Operations Section input and guidance from the IC. This Section is also responsible for securing any necessary outside resources (e.g. line skills, tree trimming) that are necessary to support incident response.

D.3.3.1 Situation Planning Branch Summary

Situation Planning is responsible for gathering needed information to prepare the needed daily Incident Action Plans during an event.

Method of work

- Incident Action Plans are prepared a day in advance.
- Example: Situation Planners working on Thursday are preparing the Incident Action Plan for Friday.

Staffing

- Branch manager at the Incident Command Center in Greenspoint
- Situation Planners placed at different parts of the service territory as follows:
  - 4 at EC/DC (1 for Distribution Operations, 2 at Transmission Substation, and 1 at Dispatching)
  - 1 at Transmission Restoration center in South Houston
  - 1 at Major Underground in Harrisburg Service Center
  - 3 at the Incident Command Center in Greenspoint

Inputs

Information for the incident action plans, including:

- A variety of ICS forms
- Maps from GIS
- Weather reports from DCC

Tasks

Coordinate among the various groups (see Staffing section above) to gather the information needed to create the daily incident action plans

Outputs

- Daily incident action plans
- Prioritized request of Telecom's restoration needs (from Telecommunications Services)
- Output of the current Hurricane Ike model (from Status Documentation)
- Notification on changes that need to be made to meet current restoration goals (from Status Documentation)

D.3.3.2 Resource Acquisition Branch Summary

The Resource Acquisition Branch is responsible for:

- Compiling a listing of available resources and finalizing contracts for distribution line skill, tree skill, and transmission line skill that can help with storm restoration by June 1st each year
- Creating a roster of available resources including their capabilities and equipment
- Activating contractors and mutual assistance crews as required

Staffing

- Branch Director of Resource Acquisition
- Contractor Acquisition manager

- Mutual Assistance Acquisition manager
- Acquirement Data manager

During the course of an event, there is a significant level of effort in the beginning and end stages. Therefore, during the course of an event, some of these resources may be temporarily reassigned to other roles.

- Resource Acquisition Group staff
- Resource Acquisition Support staff
- Liaisons – Inspection, Transmission, and Tree resources

Inputs

- Receive human resource requirements from operations and support areas
- Contractor storm rosters, including skills and equipment inventory and contact information from contractors
- Initial staging site location and staffing requirements (from Operations)
- Signed contracts (from selected contractors)
- Timesheet information entered into ESR by Staging Site Support staff
- Contact information for check-in coordinators at each staging site (from Resource Unit)
- Instructions on the demobilization of resources (from Operations)
- Information on whether or not crews are being dispatched to another event (from foreign crew leadership)
- Requests for specialized equipment (from Vegetation Management)
- Communications concerning Vegetation Management's responses to special Vegetation Management (from Vegetation Management)

Tasks

Pre-storm season

- Compile a listing of line and tree trimming contractors capable of supplying resources for storm restoration. The details on the contractors prior to activation will include:
    - Contractor name
    - Contact name for contractor
    - Union/non-union status
    - Address
    - Contact number and email address
    - Vendor number and contract number
    - Execute business agreements with selected contractors by June 1st of each year (Supply Chain). This will expedite emergency activations.

Pre-storm

- Upon activation of the Storm EOP to a Category I, Alert THREE, alert the contractors that they may be activated and validate availability of their resources and equipment.

Based upon the restoration plan authorized by the Operations Section Chief, some contractors will be authorized to begin movement to Houston prior to storm arrival. Other contractors may be flown in to integrate with Company crews, while some may be notified after additional assessment of system damage.

- Enter crew roster data into ESR

Restoration

- Verify that timesheet data is entered into ESR daily for contractor resources
- Enter crew roster data and estimated and actual arrival dates into ESR
- Prepare daily reports summarizing resources, and their statuses
- Direct all contract crews with vehicles to an assigned staging site.

These crews may later be re-directed to other staging sites if they are needed more elsewhere.

- Help to resolve exceptions (examples: crews show up at the wrong site, crews that do not show up, crews that are not cleared for participation in EOP)
- Prepare and continuously loading backup database for reporting

Demobilization

- Notify foreign crew leaders that they are being sent home
- Notify contractor contact that crews are being demobilized
- Issue and mail letters of thanks to demobilized crews
- Update ESR with demobilization dates for foreign crews
- Communicate with staging site management about the demobilization of crews

Post-storm

- Assist with the validation and payment of contractor invoices
- Lead effort to rank and review contract resources
- Assist with rate filing and related audits

Outputs

- Daily reports summarizing resources, and their statuses
- Updated ESR data for contract resources

D.3.3.3 Resource Unit Branch Summary

The Resource Unit branch is responsible for:

- Tracking of all resources (internal and external)
- Onboarding/offboarding contract and mutual assistance resources. In order to achieve these objectives, this branch is divided into 2 groups:
  - Resource Management
  - Resource Reporting

Staffing

- Resource unit branch director (Greenspoint Incident Command Center)
- Resource management:
  - 1 resource management manager (Greenspoint Incident Command Center)
  - 4 check-in supervisors (initially at the Greenspoint Incident Command Center, then assigned on day 2 to their respective staging sites)
  - 56 check-in coordinators (at staging sites)
- Resource Reporting:
  - 1 resource reporting manager (EC/DC)
  - 11 resource database coordinators (EC/DC)

Inputs

Both groups:

- The number of contract/mutual assistance crews that are being assigned (Resource Acquisition)
- The schedule of the arrival of mutual assistance support (Resource Acquisition)
- Where the crews are being initially assigned (Resource Acquisition)
- Badges and decals (from Security)

Resource Management

- Badges for foreign and mutual assistance crews (from Security)
- CNP decals for foreign and mutual assistance crews and their vehicles

Resource reporting

- Check-in and check-out sheets from Resource Management group
- Receive requests for internal resources for EOP duty
- Receive resource re-assignment information

- Receive information on released resources from EOP duty
- Information in Employee Storm Roster
- Information on staff augmentation from operating areas Examples: GIS, Underground Locating

Tasks

Resource Management:

- Check-in:
  - Validate roster of personnel and equipment, and make adjustments as required and authorized.
  - Verify license plate information provided on the rosters or record the license plate and issuing state for all vehicles and trailers, if not provided on the roster (in support of the Tool Road procedures, see page 10, Section A.1.5.1)
  - 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
  - Issue badges, fueling cards, and parking instructions
  - If available, enable GPS tracking of authorized vehicles
  - Make sure they go through the safety training and get handed off to the hotel coordination branch
  - Ensure that the mutual assistance/contract crews understand the check-out process
  - Re-route unexpected crews to appropriate site if required
- Check-out:
  - Ensure laundry has been picked up
  - Collect ID badges
  - Provide any additional logistical support required for departure
  - Log time departed in the EOP resource database (SharePoint)
  - If needed, disable GPS tracking of vehicles

- Other duties as assigned, as long as they stay on the staging site
- Receive demobilization information from Operations and Resource Acquisition (at least 24-hours in advance of demobilization, when possible)

Resource Reporting:

- Update EOP resource database (SharePoint)
- Run daily reports and ad-hoc reports
- Aligning requests for internal resources with internal resource availability
- Receive demobilization information from Operations and Resource Acquisition (at least 24-hours in advance of demobilization, when that is possible)

Outputs

Resource Management:

- Check-in:
  - Resource updates to the Resource Acquisition group
  - Completed check-in list for each contract and mutual assistance group
  - Lists of license plate information and issuing state for all non-CNP vehicles and trailers to the Security Branch Check-out
  - Resource updates to the Resource Acquisition group
  - Completed check-out list for each contract and mutual assistance group

Resource Reporting:

- Based on information from Resource Management group, updates for the EOP database, with any roster changes, equipment adjustments, or check-in/check-out information.

- Standard daily EOP resource report to Operations
- Daily resource availability reports
- Ad-hoc resource reports
- Contact information for check-in coordinators at each staging site (for Resource Acquisition)

D.3.3.4 GIS Resources Branch

This GIS resources branch is responsible for:

- Providing analysis, reporting, maps and applications to aid in damage assessment, restoration and communication internally and externally
- Helping with damage assessment as needed

Staffing

- Branch director (at the Incident Command Center)
- Manager (at DVAL)
- GIS Support - core GIS staff at the CNP tower to ensure integrity of system infrastructure, map and map copy production, data analysis and special requests
- GIS Support - developers at CNP tower for advanced GIS work such as complex analyses and processing of orthoimagery
- GIS Support – reassigned to the field for damage assessment and other EOP roles/activities
- GIS Support - to be located at Services Centers for GIS analysis and/or other support activities (includes specific assignments at EC/DC and Harrisburg at a minimum).

Inputs

Outage and restoration data from OAS in the short term, and

- Outage data from ADMS in the near future, and restoration data from replacement system to be named (by substation area, circuit, and circuit sections)
- Requirements for ad-hoc mapping and reporting requests

Tasks

- Produce maps, reports and analyses
- Maintain the hardware and applications for GIS
- Ensure that Outage Tracker is populated with outage and restoration data, and provide comparison and analyses of said data
- Provide various routine as well as ad-hoc reports

Outputs

- Additional 11" x 17" facility maps upon request for use as patrol maps or storm restoration tracking maps
- The availability of all maps required for inspection and documentation of circuits assigned to each Service Area, for field patrol use. Maps shall be of sufficient size and detail to allow field patrols to follow un-fused feeder main (backbone) and fused laterals.
- Web-based Outage Tracker application specifically designed to capture and display outages and estimated restoration dates for internal and external consumption. This application will have total failover capabilities should the equipment fail or if power is lost to the CNP Tower.
- Updated GIS information based on as builts received from field crews (post event)
- Ad-hoc reports as requested
- Web service feeds to DOE

D.3.4 Logistics Section

D.3.4.1 Introduction

The Logistics Section is responsible for all service support requirements needed to facilitate effective and efficient incident management, including: meals, lodging, facilities, laundry and miscellaneous resource needs. The organization is made up of a combination of CNP employees and select contractors.

D.3.4.2 Logistics Resources Branch

The Logistics Resource Branch is comprised of three distinct groups, each with its own function. These groups are Hotel Coordination, Supply Chain and Staging Site Resources. Each is discussed in detail below.

3.4.2 1. Hotel Coordination Summary

Hotel Coordination is responsible for:

- Providing mutual assistance support as CNP crews travel to and from disaster areas (for mutual assistance events outside CNP's territory)
- Providing lodging assistance to CNP employees and retirees, incoming line crews and tree crews, and other support personnel as needed. (For disaster recovery within CNP's territory)

Staffing

- Hotel Coordination manager
- Hotel coordinators, including:
  - 4 geographic leads
  - 1 employee lead
  - 1 contracts lead
  - 1 resource acquisition liaison
- Hotel coordinators (the number depends on the size of the event)

Inputs

- Information on mutual assistance and contractor crews (number, gender, supervision, support), when lodging is needed and expected duration, and where

they will initially be stationed (from Resource Acquisition or utility requesting assistance)

- Hotel availability assessment (external 3rd-party and local information), including:
  - If the hotel is operational
  - If the hotel has limited operations (due to a power outage or flooding, for example)
  - The number and types of rooms the hotel has available
- Approved lodging options in addition to hotel availability (from Incident Commander)
- Hotel Coordination staff requirements for each staging site (from Operations)
- Notifications when resources shift in the territory (from Resource Unit)
- Notifications regarding resource demobilization (from Operations)
- Contact information for foreign crew leadership (from Resource Acquisition)

Tasks

General Hotel Coordination activities:

- Verify that Hotel Coordination has received needed information from Resource Acquisition
- Disseminate information (mainly contracts and staging sites that are affected) from Resource Acquisition to hotel coordinators
- Acquire contracts with hotels
- Provide contracted rooms and hotel names to appropriate hotel geographic leads
- Match room inventory with incoming crews, and making pre-arrival assignments
- Communicate assignments to group hotel liaisons
- Ensure that keys are ready before crews arrive

- Validate that the rooms that hotels provide match what they contracted with us for
- Provide the hotels with appropriate contact information and the CNP check-in process
- Complete daily reconciliation and problem resolution with hotels
- Coordinate check out process with hotels
- Coordinate hotel payments with Finance (by credit card or invoice)
- Enter required information into ESR
- Accurately complete daily forms 1-5 and issue log
- Participate in conference calls as needed Staging site

Hotel Coordinators

- Verify that crews that need hotels have received their badges
- Check in crews for room inventory and finalize hotel assignment
- Complete roster form and have crew lead sign it (this becomes the crew's check in authorization at the hotel)
- Communicate with busing about needs for crew transportation and hotel assignments
- Determine bus driver lodging needs, and assign rooms for drivers
- Handle any lodging issues
- Relocate crews when needed
- Assist with crew check out process

Outputs

- Where crews will be housed (for Staging Site Logistics)

- Rosters for hotels
- Busing needs (to Staging Site Logistics)
- Management reporting as requested
- Contract documentation
- Completed forms and logs

Supply Chain

Summary

Supply Chain has EOP responsibility to evaluate, plan, and execute the procurement, management, and delivery of restoration material to CNP and mutual assistance crews.

Staffing

Internal staffing:

- Manager
- Logistics leads
- Purchasing lead
- Material coordinator
- Materials management handlers
- Material handlers
- Purchasing storm team

Staff augmentation (depends on the size of the event):

Material handlers from:

- Employee storm roster
- Mutual assistance
- Contractors

- Trucking support

Inputs

- Official declaration of EOP (from Incident Commander)
- Current inventory levels from SAP
- Information on facility status from EOP briefing conference calls
- Information on incoming internal and external crews (from Resource Acquisition)
- When and where staging sites are opening (from Operations)
- Requests from Substation, Transmission, and Major Underground

Tasks

Pre-storm season:

- On an annual basis, evaluate and execute adjustments to the Central inventory in preparation for storm season.
- Prepare contracts for EOP services such as line skills, logistical needs, and vegetation management
- Update the Special Material Release with Engineering to ensure that the appropriate materials are included and updated
- Ensure that Staging Site Kits are complete, and re-stock them as needed

Pre-storm preparation:

- Pre-pack 5 Service Center Storm Kits and strategically pre-position them year round at selected Service Center locations.
- Pre-position approximately 7 Staging Site Kits for quick access prior to the hurricane season, and ship them to staging sites as directed.

- Once EOP has been declared, place the initial Special Material release at minus 6 hours to landfall.

Restoration:

- Manage logistics operations at the Service Centers, material depots, and staging sites with timely material replenishment.
- Work with Operations and Distribution Standards and Material for material substitution authorizations.
- Work with Environmental in support of hazardous material handling and disposition.
- Based on information from the following sources, Supply Chain will project the anticipated material needs for the remainder of the restoration:
  - Conference calls
  - Discussions with Operations management
  - Resource allocation
  - Historical data

    This calculation happens on a daily basis.
  - Information from Staging Site Logistics leaders

Outputs

Materials and equipment

Staging Site Resources Summary

The Staging Site Resources group is responsible for:

- Coordinating the following:
  - Transportation

- Laundry
- Meals
- Ice
- Drinks
- Parking
- Trash
- Port-o-cans
- Washing stations
- Lighting
- Other non-operational items such as dust control, etc.
- Temporary housing if required

- Working with vendors who provide those services on site
- Working with Purchasing to identify and contract with vendors who provide those services off site

Staffing

- Manager
  - Responsible for management and oversight of the logistics network
  - Oversees Lead Coordinators
- Staging site lead logistics coordinators personnel: Responsible for directing the activities of the logistics coordinators at the site and working with the Hotel Coordinators to resolve any hotel issues
- Logistics coordinators: Responsible for the coordination of logistic activities at CNP facilities and staging sites

Inputs

- Authorization to begin setting up staging sites (from Operations)

- Number of staging sites to be set up (from Operations)
- Number of arriving crew (from Resource Acquisition)
- Estimated arrival times for crews (from Resource Acquisition)
- Which staging sites crews are assigned to (from Resource Unit)
- Where crews will be housed (from Hotel Coordination)
- Where crews are re-assigned to (from Resource Unit)
- When staging sites will begin to be demobilized, and how quickly they will be demobilized (from Situation Planning)
- Signage (from Security)
- Busing needs (from Hotel Coordination)

Tasks

- Handle all creature comforts, as defined above
- Support vendors providing services
- This group is not responsible for fleet, fuel, materials, security, hotel coordination, or operations- related tasks (such as assigning work or mobilizing crews).

Outputs

- Information on financial implications of staging site logistics (to the Finance Section)
- Documentation of additional services above initial scope (to the Finance Section)
- Documentation of services agreed to and rendered (to the Finance Section)

D.3.4.3 Fleet and Shops Services Branch Introduction

Fleet and Shops Services is responsible for:

- Making sure that employees have the vehicles they need for emergency work
- Ensuring that those vehicles are properly maintained
- Fueling employee, contractor, and mutual assistance vehicles
- Coordinating the deployment, tracking, and return of light fleet rental vehicles
- Making all bargaining unit employees not directly involved with specific storm duties available to the Resource Unit for reassignment as needed for distribution system restoration

Fleet Services

Summary
Fleet Services is responsible for pre-planning activities and execution of EOP plans necessary to provide assistance to all CNP transportation and fueling-related activities.

Fleet Services will assist Mutual Assistance and Contract Crews with the following:

- The identification and contact of area Fleet Service providers to support mutual assistance crews and contractors with vehicle and equipment maintenance/repair needs
- Establishing communications links
- Arranging for unique fuel and assistance in coordinating maintenance requirements
- Locating local supplies of repair parts and tire repair for foreign vehicles

CNP is **not** responsible for the actual repair work on contractor or mutual assistance vehicles. CNP simply helps with communication links between contractors/mutual assistance and fleet services providers.

Staffing

- Manager of Fleet and Shops Services

- The number of fleet resources will vary based on the severity of the storm. The remainder will be allocated to EOP roles.

Inputs

- Requests for vehicles from service centers
- List of staging sites that are open, and their fueling capacities
- Requests for repairs

Tasks

- Coordinate all CNP vehicle maintenance
- Provide fuel for all CNP, contractor, and mutual assistance vehicles Crews will be placed on 16-hour shifts at maintenance and fueling garages as necessary to support restoration efforts.
- Find and assign underutilized vehicles that are needed in the field
- Perform repairs on CNP vehicles as needed

Outputs

Operational and adequate fleet

Fleet Support Summary

Fleet Support is responsible for providing back-office support for both Fleet and Shops Services for restoration efforts, as it relates to procurement and accounting for fuel purchases and work order activities.

Staffing

- Manager of Fleet and Shops Services
- Lead
- Fleet support personnel

Inputs

- Information on Staging Site fueling activities
- Information on fuel capacities from fuel providers (Sun Coast)

Tasks

- Reconciling fuel usage and expenses
- Replenishing fueling supplies

Outputs

- Adequate fuel supply
- Reconciliation of fuel and expenses (to Finance Section)

Shop Services

Summary

Shop Services is responsible for:

- Providing preplanned assistance in services and personnel to repair or replace CNP tools involved in restoration efforts.
- Repairing and providing replacement parts for damaged sectionalizing equipment needed to restore the transmission, substation, and distribution systems
- Performing custom repairs/fabrication of parts for substation equipment
- Assisting with field response and repairs to IGSDs as needed

Staffing

- Manager of Fleet and Shops Services
- The number of Shops resources will vary based on the severity of the storm. The remainder will be allocated to EOP roles.

Inputs

- Requests for custom fabrication work and repairs to the distribution infrastructure (from the field)
- Requests for field force tool repairs (from the field)
- Requests for grounds

Tasks

- Fill the orders for custom fabrication work and repairs
- Issue protective grounds
- Build additional grounds if required

Outputs

- Working equipment
- Fulfillment of requests for repair work
- Adequate supply of grounds

D.3.4.4 Facilities Branch Summary

Facilities is responsible for:

- Preparing facilities in advance of an event
- Coordinating the repair of damages at CNP-owned facilities
- Ensuring that CNP-owned facilities have adequate facility supplies and services

Staffing

- Manager
- Site EOP Facilities Coordinators (one per staging site)

- Facilities Support personnel (contractors), responsible for assisting the Facilities Coordinators as needed

Inputs

Requests for repairs or services

Tasks

Repair facilities as needed

Outputs

- Operational facilities
- Status reports as requested

D.3.4.5 Security Branch Summary

Corporate Security is responsible for:

- Maintaining a safe and secure work environment for all personnel and vehicles involved in EOP recovery.
- Securing assets during EOP Coordination and deployment of 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
- 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 Harris County Toll Road Authority (HCTRA)
- On-going maintenance, monitoring, and responses to electronic security systems

Staffing

In the field:

- 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

- Keeping time 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

D.3.4.6 Staging Site Management Summary

Staging site management is responsible for setting up and managing bases of operations for major restoration efforts involving mutual assistance and contract crews.

Staffing

- One senior level manager per primary and secondary staging site, to set up and administer the site

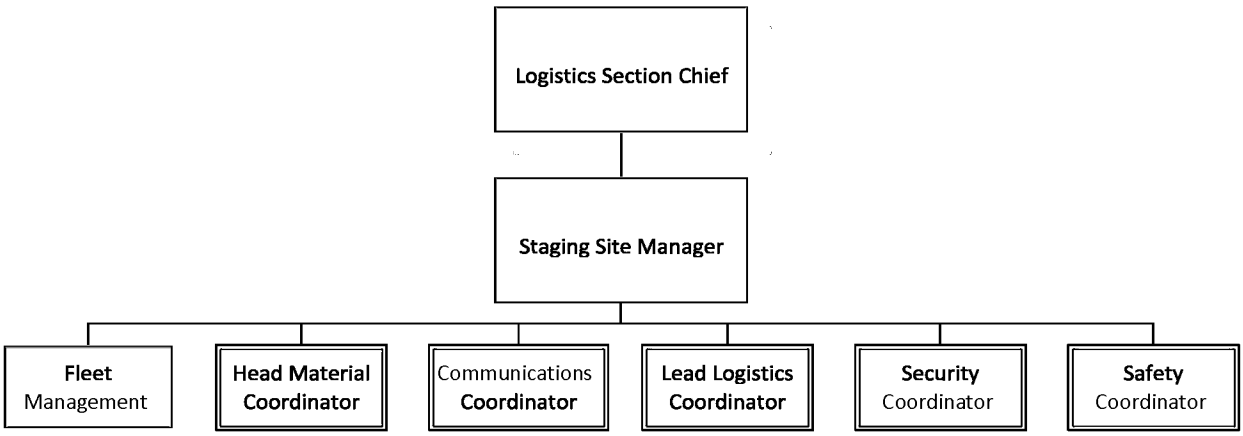
The secondary site managers will assist the primary site managers as needed

- Support personnel in order to provide Distribution Operations and their crews with basic services
- Security personnel: Responsible for:
  - Establishing a safe and secure area for the coming and going of all personnel and vehicles
  - Providing those crews with appropriate identification
  - Directing traffic, including hotel buses
  - Arranging for convenient parking of crew trucks
- Fleet personnel: Responsible for:
  - Locating the fuel skids in a safe and convenient location
  - Having all crew trucks fueled and ready for duty each day
  - Repairing and maintaining of internal fleet vehicles
  - Arranging for rentals if necessary
  - Putting external crews in touch with repair vendors
- Materials personnel: Responsible for:
  - Obtaining and stocking basic materials and supplies needed by the restoration crews
  - Providing tools

- Providing occasional hot shot delivery services to crews in the field

- Communications personnel: Responsible for establishing the communication network at the staging site, including telephone, internet service, and technical support.
- Staging Site Logistics personnel: Responsible for:
  - Providing sit down breakfast and dinner for all foreign crews and staging site support personnel
  - Providing carry out lunches
  - Taking care of crew laundry service and staging site cleanup services
  - Coordinating the service of portable restroom services

The following is the organizational structure of each site*:



Note: This is the structure for the Logistics branch only. Sites will also have Operations assigned to it and other support functions, such as Resource Check-in Coordinators.

Inputs

- Notice from Distribution Operations Branch Director about which sites need to be activated (the sizes of the staging sites that are activated determines the list of resource requirements)
- Kick-off pallets from the Special Material Release (from Supply Chain)

- Number and estimated arrival time of incoming crews (from Resource Acquisition group

Tasks

- Help with initial clearing of debris at staging sites
- Assist with coordination of staff that primarily are responsible for security, logistics, materials management, communications, fleet services, staging site resources, or facilities
- Set up flow patterns for traffic, including signage
- Establish parking
- Ensure the safety of the staging site
- Resolve issues that arise over the course of the restoration effort

Outputs

- Safe, functional staging site

D.3.5 Finance Section

D.3.5.1 Summary

The Finance Section is a critical part of ICS in complex incidents involving significant funding. The Section Chief tracks and reports to Incident Command the accrued cost as the incident progresses and may also be asked to provide forecasts to ensure operations are not negatively impacted. Some of the functions that fall within the scope of this Section are conducting overall cost analysis for the incident and maintaining typical operations such as accounts payable, and revenue billing. The Finance Section is responsible for:

- Minimizing financial risk and loss for CNP
- Tracking costs related to the event

- Reimbursing applicable parties per their existing agreements with CNP
- Helping to put together damage estimates for smaller events

Within the Finance Section, four primary Branches fulfill functional requirements:

- Reporting: provides cost analysis and forecasts to Incident Command
- Financial Services: continues typical operating functions such as accounts payable, remittance processing and revenue billing
- Insurance: administers all claims other than auto, general liability and excess liability
- Treasury: manages cash funding requirements

Although most groups in the Finance Section operate as normal, their activities are related to the Storm EOP. A brief summary of responsibilities are listed below.

D.3.5.2 Reporting Unit Summary

The Reporting Unit provides cost analysis and forecasts to Incident Command.

Staffing

- Reporting Unit branch director
- Liaisons

Inputs

Restoration:

Ad hoc reporting requests

Post-restoration:

- Requests for reporting

- Assumptions related to the regulatory recovery of storm costs (from Regulatory Reporting)

Tasks

Pre-storm:

- Send out information on how internal employees track time during a Storm EOP
- Setting up the cost collectors for an anticipated storm event

Restoration:

- Put together an estimate of what the storm will cost
- Coordinate with other Finance groups to gather the information needed for internal and external reporting, including:
  - Analysis of the impacts to revenues, operating expenses and capital
  - Timing and amount of regulatory recovery of storm costs
- Respond to requests for reports

Post-restoration:

- Coordinate with other Finance groups to gather the information needed for reports
- Respond to requests for reports
- In the event is serious enough that the Company service area is declared a federal disaster area, coordinate with the Tax department and Insurance to determine the amount of tax deduction

Outputs

Restoration:

- Estimate the amount that the storm will cost and the amount of regulatory recovery (to Investor Relations and Regulatory Reporting areas)
- Information on how to track costs

Post-restoration:

Financial reporting as required to support regulatory efforts (to Regulatory Reporting branch director)

D.3.5.3 Financial Services Summary

Accounts Payable ensures timely payment for goods and services rendered during restoration. Remittance Processing ensures the timely processing of checks. Payroll and Administration ensures timely payment to staff. Electric Revenue Billing determines the correct billing information to send to REPs on behalf of customers and calculates lost revenues

Financial Services does not have an official Storm EOP status. They will continue their normal activities during a Storm EOP. However, these activities are related to Storm EOP.

D.3.5.4 Insurance Risk Management Unit Summary

The Insurance Risk Management Unit is responsible for administering all claims other than auto, general liability, and excess liability.

Staffing

This group does not have an official Storm EOP status. They will continue their normal activities during a Storm EOP. However, these activities are related to a Storm EOP.

The staff includes 3 Corporate Insurance Coordinators and 1 administrative assistant.

The other Insurance staff are loaned to other branches during a Storm EOP, except the administrative assistant. The administrative assistant reports workers compensation claims through the One Call procedure.

Inputs

- Insurance claims information from daily status conference calls
- Injury information from Disability Management
- Workers compensation claim payments (from an outside vendor)

Tasks

- Notify property insurance brokers and adjusters if damage exceeds deductible
- Assist Environmental, Safety, Legal and Human Resources' representatives with submission of company incident reporting forms to meet insurance policy discovery and reporting time deadlines/restrictions.
- Gather preliminary facts and create reports for adjusters based on damage inspections of locations.
- Coordinate arrangements for adjusters to be at the damaged sites.
- Provide estimate of the property loss
- Assist affected business units, gather documentation to support an insurance claim.
- Manage claims through settlement.
- Process workers compensation claim payments on a weekly basis

Outputs

- Reports for executives as needed
- Deposit proceeds as directed by affected business unit
- Payments for workers compensation claims

- Information on lost time workers compensation claim payments (for Payroll salary continuation)

D.3.5.5 Treasury Summary

Shareholder Services: Serves as transfer agent, registrar and dividend paying agent for CNP common stock and administers CNP's Investor's Choice Plan. Long-term Finance: Long- Term Finance evaluates and implements financings, ensures that compliance reporting and other requirements in financing agreements are satisfied and administers trust relationships.

This branch does not have an official EOP status. They will continue their normal activities during EOP. However, these activities are related to EOP.

Tasks

Coordinate with the Director Operations for cash funding requirements prior to the storm. Per the CNP General Expense and Reimbursement policy, cash advances during an emergency other than EOP must be approved by the Business Unit President or functional area leader. Cash advances normally not available may be made available during an EOP situation when the card holder has established the cash feature of his or her OnePay card.

Section E: Annexes

Per 25.53. the following annexes are included in this section:

- Annex A – Weather Emergency Annex
- Annex B – Load Shed Annex
- Annex C – Pandemic and Epidemic Annex
- Annex D – Wildfire Annex
- Annex E – Hurricane Annex
- Annex F – Cyber Security Annex
- Annex G – Physical Security Incident Annex
- Annex H – Mobile Generation/Long Lead Time Facilities Annex

Annex A

Weather Emergency Annex

Hot Weather Emergency

PURPOSE

The purpose of the hot weather emergency annex is to provide a guide on preparing for and responding to extreme heat measures that could impact the CenterPoint Energy Houston Electric (CEHE) footprint.

SCOPE

There are two distinct responses that could cause an elevated response from CEHE during an extreme heat situation.

- Load Shed as directed by ERCOT
- Widespread outages due to heat related transformer outages (also known as a Transformer Tsunami)

RESPONSE – 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 utilized the Emergency Operation Plan (EOP) as necessary to support this response.
- For additional information regarding the load shed plan, please reference (Annex B)

RESPONSE – Equipment Failure

- Distribution Operations maintains a Storm Response Organization to respond to localized weather events. It is the responsibility of the Incident Commander (IC) on duty to monitor the situation and determine if the Response Plan within Distribution Operations should be activated.
- Upon activation, the Incident Command structure will be based on the roles identified in the Storm Response Plan. 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 the EOP at Level 1 to provide additional support and garner additional awareness from leadership.
- For additional information, please reference the CEHE Storm Response Plan.

Cold Weather Emergency

Proactive Weatherization

- CEHE designs its transmission circuits to conform with the latest edition of the 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 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 has a comprehensive transmission line inspection and rehabilitation program based on a 5-year cycle to ensure that the integrity of existing transmission structures and wires is maintained. Twenty percent of the transmission system is ground inspected and maintainedeach year. Any line component identified that will likely cause a failure or a circuit outage within a critically short period of time is promptly addressed.

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 has a comprehensive distribution wood pole inspection and rehabilitation program based on a 10-year cycle to ensure that the integrity of existing wood pole structures is maintained. Ten percent of the transmission system is ground inspected and maintained each year. Any line component identified that will likely cause a failure or a circuit outage within a critically short period of time is promptly addressed.

Anti-galloping

- Additionally, beginning in 2015 and continuing into 2022, CEHE has completed system hardening projects to retrofit portions of 69 kV and 138 kV transmission circuits with anti-galloping devices to avoid damage from icing conditions.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex B

Load Shed Annex

Load Shed Annex

Procedure for controlled shedding of load

Pursuant to the ERCOT Protocols, the Company coordinates with ERCOT during an Energy Emergency Alert (EEA) event. Real-Time Operations Dispatchers coordinate electric grid activities with ERCOT System Operators using ERCOT Protocols and Operating Guides as well as in-house procedures. CNP is required to implement ERCOT-directives to maintain grid reliability.

In accordance with NERC Standard TOP-001-5 R1, without direction from ERCOT, the Company has the flexibility to curtail load by a variety of means, which include implementing the following measures, as time permits:

1. Curtailing all non-essential load within Company facilities;
2. Reducing distribution circuit voltage to achieve load reduction; and
3. Appealing through the media that all customers voluntarily reduce load.

After implementing the above measures, if circumstances require that load be reduced further, the Company will initiate its manual load shedding programs. This is accomplished by shedding distribution circuits as necessary to maintain system frequency, while rotating the outages of distribution circuits. Circuits are divided into four categories called "blocks". The blocks consider the following: Emergency Load Reduction Schedule (ELRS), NERC standards, and ERCOT Protocols and Operating Guides. In the event that the manual load shedding program does not correct the emergency conditions, automatic under-frequency programs will be activated at the following specific frequency levels: 59.3 Hz, 58.9 Hz and 58.5 Hz. Load assigned to the block for each frequency will in turn be curtailed.

Priorities for restoring shed load to service

Load manually shed as a result of an ERCOT declared EEA load shed event will be rotated and restored based on the order of the distribution feeders for each block as defined in the ELRS.

Hazardous conditions, such as downed power lines, are the highest priority. Because the objective is to restore service to as many customers as possible, restoration of transmission circuits, substations, and distribution feeder mains are begun simultaneously. The distribution restoration proceeds in the following order:

1. primary feeder lines;
2. primary fused laterals;
3. transformers;
4. secondaries; and

5. service drops.

Inspection of and repairs to the feeder circuits are prioritized, so that service to large blocks of customers can be restored as soon as possible. Crews are directed that they must sweep the circuit (i.e. repair ALL damage related to that circuit: circuit, fuses, transformers and service drops) before moving on to the next circuit. After this, the restoration effort is guided by information provided by the Company's Outage Management System (OMS). The information printed on each trouble order includes the name of the device determined to be out of service as well as the number of customers affected. After a device is determined to be out of service, the Company stops printing further orders unless a hazardous condition is reported. Trouble orders from OMS are dispatched to the crews in the affected area in the following order:

1. line-fuse vicinities;
2. transformer vicinities; and
3. single order lights out.

The crews then schedule repairs on the basis of the critical nature of the customers and the location and number of customers affected. This system allows for an orderly and prompt response in restoration of the Company's delivery system.

Procedure for maintaining an accurate registry of critical load customers

Critical loads are defined by the PUC as "loads for which electric service is considered crucial for the protection or maintenance of public safety; including but not limited to hospitals, police stations, fire stations, critical water and wastewater facilities and customers with special in-house life-sustaining equipment."

The Company 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 Critical 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, 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.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex C

Pandemic and Epidemic Annex

Pandemic and Epidemic Annex

Introduction

CNP, like many other businesses and governmental entities, has developed over the years a variety of business continuity plan 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 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 from a wide variety of authoritative 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.

Objectives

CNP's interest is in preparedness, not panic. It is recognized that a knowledgeable, confident and healthy workforce will represent a key factor in the success of our response plan activities. CNP has three main objectives for the Pandemic Preparedness Plan:

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 plan 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, global economy, an outbreak of a pandemic infectious disease may provide little lead time before operations are affected. CNP 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 providing vaccinations and other medications to the extent that they are available, and
- Stressing the need for the sick or those potentially exposed/impacted to remain away from the workplace.

An important weapon 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, CNP employees will also need to focus on supporting the business services upon which our communities heavily rely.

Managers:

Each manager and supervisor should develop and maintain business process alternatives and business continuance plans with the expectation that a significant portion of their staff may be unavailable or away from usual work locations. In order 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 Response Plan Team (CRPT) Notification

1. The Corporate Response Plan is the Company's strategic resource on how to respond to various types of incidents and crises. The CRP is designed to ensure that resources and other support are provided to the business following an incident.

2. If an incident shows potential for escalation, it is recommended you notify the CRPT immediately.

3. To report incidents and contact CRPT during an incident, please utilize the Corporate Response Telephone and Mailbox.
4. The CRPT consists of the following personnel:

Function	CRP Description
Finance	Finance Officer
Legal	Legal Officer
CCR	Corporate Communications Officer
Safety	Safety Officer
Gas Operations	Gas Operations Officer
Electric Operations	Electric Operations Officer
IT	IT Officer
HR	HR Officer
Regulatory	Regulatory Officer
ERM	Head of ERM
Security	Head of Corporate Security
Customer	Customer Officer
ERM Analyst	ERM Analyst
Emergency Operations	EOP Coordinator

Critical company functions

Unlike the disasters contemplated by some of the company's other business continuity plan, a pandemic 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 constitute CNP.

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. CNP'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 plan 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 public or private 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 to be 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. Table B within the Appendix details the actions CNP will take at this phase of a Pandemic event.

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 should be noted that a pandemic may affect countries, as well as populations within a county, to varying degrees during any of these alert phases as the infectious disease spreads.

Recovery Period

Once the pandemic wave has passed, CNP 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, CNP will be focused on employee education, departmental contingency planning, workplace health and safety, and response activity practice. Beginning with Pandemic period, CNP 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 CNP stakeholders has been identified as a key element to the effectiveness on the Preparedness Plan.

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

CNP's employees are our most valuable assets and will continue to be given careful attention in preparation for a potential pandemic. The company will endeavor to maintain a healthy and safe work environment, as well as emphasize the vital role and responsibility of the employee in CNP'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 Preparedness Plan, discussion with the employees about their roles and responsibilities and rehearsing response activities as appropriate for each work group to sustain confidence in the effectiveness of the plans.

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 CNP's Pandemic Preparedness Plan
- 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

CNP 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.

Training:

The Pandemic Preparedness Plan Team will meet annually to discuss necessary updates to the plan. A corporate communication will be sent to CNP managers annually to educate on the purpose of the plan and to encourage their employees to prepare for such a threat.

Educational resources will be available and accessible to all employees on the CNP Today Pandemic page.

Educational resources

CNP's Pandemic Preparedness Plan 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 CNP'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

Conclusion

CNP will routinely review and update this preparedness plan so that response activity strategies can remain current and effective. The success of the company's response activities, if and when they are needed, will not only be dependent on full employee participation in the review and understanding of these plans, but their practice as well.

Annex D

Wildfire Annex

Wildfire Mitigation Efforts

The Company performs periodic maintenance including clearing trees away from the conductors and equipment on approximately 1,600 circuits. This proactive maintenance takes place on a cyclical basis. For 35kV voltage and some selected 12kV circuits, maintenance is performed about every three years while the remaining 12kV circuits are maintained on a 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.

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 performs an annual inspection of the whole transmission system to identify hazardous trees or other vegetation issues that need immediate attention. Additional inspections may be performed in selected areas as warranted by conditions or situations conducive to increased tree mortality or risk exposure.

Additionally, when advance notice of a hazardous fire conditions are issued by the local Fire Marshal that could involve transmission ROWs and facilities, mowers are dispatched to reduce brush within the ROWs along with herbicide contractors to apply fire retardants to the bases of the Company's towers and structures to mitigate or reduce potential fire damage.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex E

Hurricane Annex

HURRICANE ANNEX

A. Introduction

This annex provides a framework for the activation of the EOP 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.

In order 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.

Electric Operations leadership, or authorized designees, shall have the following responsibilities:

- Activating the EOP when a system-wide storm emergency situation exists or a threat is imminent
- Directing all operations once the EOP is activated
- Keeping the President and Chief Executive Officer of CNP informed of system conditions, activities, and progress towards restoration of electric power under the EOP

B. Pre-Storm Preparation

Hurricane Drill

To promote familiarity with the EOP, a general hurricane drill exercise is outlined below. When possible, this exercise coincides with the State Hurricane exercises to provide increased realism. Mock hurricane advisories are communicated similar to those given by the local National Weather Service (NWS) during an actual storm. These notifications are designed to test tracking and activation procedures. These advisories are given regularly during the exercise. Minor disruption of some regular employee activities is anticipated but there are no line crews engaged.

The primary objectives are:

- Testing the communications involved with activation of the Emergency Operations Plan;
- Testing employee information systems:
    - Corporate email
    - Corporate employee hotline
- Evaluating pre-season preparations;
- Verifying knowledge of specific EOP duty assignments;

- Activating the Incident Command Center in the Greenspoint Annex ;
- Activating the Distribution, Transmission and Substation, and the Energy Control Evaluation Centers;
- Utilizing recommendations from previous exercises and events to test and practice Storm EOP procedures;
- Evaluating implementation of Incident Command processes and procedures;
- Simulating media and regulatory reports; and
- Simulating damage assessments and restoration schedules between evaluation centers, and posting them in a test version of Outage Tracker.

If the annual Company functional exercise coincides with the State of Texas hurricane exercise and the City of Houston and/or the Harris County Office of Homeland Security and Emergency Management have activated their Emergency Operations Centers, then the Company will also test communication techniques with those entities.

EOP Storm Roster

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

- Manage Storm EOP 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 EOP-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 an EOP 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 EOP event is declared prior to the start of that vacation, the employee is expected to talk to his or her EOP leader and direct supervisor. The EOP 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 EOP role.

If an employee is already on vacation and out of town at the time the Company declares a storm EOP event, the employee is not expected to immediately return to fill his/her EOP role. Upon returning from vacation the employee is expected to immediately report for EOP 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 EOP 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 EOP duties. The request will be reviewed by management and a decision made within 30 days after the final day of the EOP event.

Employee Responsibilities

If the Company activates the EOP 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 storm preparation prior to a Storm EOP event and lodging planned for "First Responders" with established criteria will be communicated by local management.

Business continuity during an EOP is critical. All employees, whether in their normal job or an EOP 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 EOP is to the assigned EOP Leader. Daily assignments during EOP will be determined by the EOP Leader and employees may be asked to take on different assignments as needs change during the service restoration process.

• Participate in the annual EOP Drill, training, and other planning activities as required.

• Make the necessary personal pre-storm preparations to be ready and available to perform the EOP 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 EOP.

• Maintain a hard copy of important phone numbers, including EOP contacts, immediate supervisor, CNP Storm Mailbox (which provides general information during EOP) 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 EOP is declared (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 EOP assignments, in advance of EOP 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 EOP.

• Maintain current contact information in Employee Service Roster (ESR) and ensure their EOP Leader and immediate supervisor have the most current information.

• Notify immediate supervisor and EOP Leader throughout the year and during EOP assignment, if necessary, of any change in personal needs or responsibilities that may affect their ability to fulfill their EOP assignment. Examples could include: change in residence, phone numbers, or fitness for duty.

• Establish and maintain contact with immediate supervisor and EOP Leader in the event of EOP activation and throughout the active period.

• Recognize EOP 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 EOP assignment may subject employees to disciplinary action, up to and including termination of employment.

C. INITIAL STORM ACTIVATION

Basis of activation

The Company determines when it activates the EOP and response activities based on StormGeo data on the anticipated intensity of the event. The StormGeo program issues trigger reports every six hours leading up to the event. These reports help determine the appropriate course of action. The Company uses the following phases to guide the actions to be taken but the Incident Commander has the authority to deviate from these guidelines:

Trigger parameter	Phase
Response Plan Activator (RPA) is positive *	1
The Worst Case Scenario (WCS) for 39 mph winds reaching this location is < 120 hours and the probability of 58 mph Wind Impacting (PWI) this location is > 8%	2
The WCS for 39 mph winds reaching this location is < 96 hours and the PWI of 58 mph at this location is > 15%	3
The WCS for 39 mph winds reaching this location is < 72 hours and the PWI of 58 mph at this location is > 20%	4
The WCS for 39 mph winds reaching this location is < 66 hours and the PWI of 58 mph at this location is > 25%	5
The WCS for 39 mph winds reaching this location is < 60 hours and the PWI of 58 mph at this location is > 25%	6
The WCS for 39 mph winds reaching this location is < 54 hours and the PWI of 58 mph at this location is > 25%	7
The WCS for 39 mph winds reaching this location is < 48 hours and the PWI of 58 mph at this location is > 30%	8
The FTA for 39 mph winds reaching this location is < 36 hours and the PWI of 58 mph at this location is > 50%	9

Activation Alerts

The Company has a three level alert system for weather and system conditions which are used in operations and are not exclusive to a hurricane , storm, weather related or other event. These three EOP levels are designed to ensure sufficient resources are available to effectively respond to any type of event impacting CEHE's service territory. The Company is beginning to implement three activation levels in 2021.

The following is a summary of the alert levels that may be activated, based on the needs, during a specific type of event:

EOP Level 1:

- Short duration or low impact event affecting the entire CEHE service territory
- Severe impacts to only a specific area of the CEHE service territory
- Additional support roles may be needed

EOP Level 2:

- Medium duration and impact event
- Severe impacts to multiple areas of the CEHE service territory
- Additional support roles needed

EOP Level 3:

- High duration and impact event
- Severe impacts to all or nearly all areas of the CEHE service territory
- All support roles needed unless otherwise notified
- Individual department emergency plans and/or business continuity plans initiated as needed, and Corporate Response Plan activated as appropriate

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

Evacuation and Re-Entry Procedures

In the event of a storm, the Galveston and Baytown Service Centers evacuate in conjunction with activation of the evacuation plans of Harris 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 EOP Storm 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:

1. Fleet will send a list of the license plate information for any rental vehicles to Corporate Security as soon as possible.
2. Fleet will send a list of the license plate information for Houston-area fleet vehicles and trailers.
3. Service Area Managers will provide a list of the license plate information for any EOP responders needing access to the toll roads and submit it to the Security Branch.
4. Check-in Support at the staging sites will gather CNP personnel license plate information and submit it to Corporate Security.
5. During check-in of mutual assistance crews at staging sites:
6. 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.
7. 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.
8. Site administrators will send these lists to the Security Branch via fax or email.
9. The Security branch will send the license plate information to HCTRA for entry into their system to automate the "No Fine" process.

10. 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.

Factors CNP Uses to Determine EOP Phases

Factor	Description
Hurricane Risk Indicator (HRI) goes positive for the report location.	A negative HRI for a location denotes no hurricane threat has been identified through the coming week. When StormGeo identifies a location as "Positive" for a hurricane risk, in addition to putting that notice atop the TropicsWatch web page, they will also notify CNP's EOP Coordinator by phone and by email.
Worst Case Scenario (WCS) for 39 mph winds reaching the report location	StormGeo's Worst Case Scenario (WCS) parameter lets CNP know the approximate earliest arrival times of 25, 39, 58, 74, and 100 mph winds at defined report locations if an active storm were to quickly travel straight to that location. CNP's WCS activation parameter will be based on the 39 mph wind. Assumptions: The storm movement is directly toward our location Assumes a forward speed equal to the maximum forecasted forward speed over the time period prior to the storm's ETA at our location Intensity is set to the projected maximum sustained winds possible during the time period from the current position until it reaches our location Wind field size is set to the maximum projected in any one quadrant of the storm prior to reaching our location
The Probability of 58 mph Wind Impacting (PWI) the report location.	StormGeo's "Probability of Wind Impact" displays the probability of a location receiving a certain threshold of wind. Wind probabilities will be calculated for wind speeds of 25 mph, 39 mph, 58 mph, 74 mph and 100 mph. CNP's PWI activation parameter will be based on the 58 mph wind.
The Forecasted Time of Arrival (FTA) of 39 mph winds reaching the report location	As the certainty of impact to the Company's service area becomes definite, the forecast changes from Worst Case Scenario to Forecasted Time of Arrival (FTA). Again, EOP activation parameter will be based on the 39 mph wind.

Factor	Description
Sustained Winds fall below 39 mph	As the storm begins to move out of the Company's service areas, StormGeo will forecast when wind speeds for each report location are scheduled to fall below 39mph.

Activation Phase Descriptions

The following table describes fourteen phase points for which CNP has designated specific storm preparation activity. This table describes the parameters required to determine when each of these phase points has been or will be achieved. These phases are based on When StormGeo 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 with CNP's EOP Coordinator by phone and by email.

Phase	Description
1 - Hurricane risk indicator is positive	**Notification to executives** The EOP Coordination Team communicates potential storm threat to executives. Keep executives clearly informed of developing storm conditions and obtain concurrence to begin employee communications.
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/Employee Information Officer (P/EIO) sends out company-wide communications to employees to tell them to prepare home and family for a storm, know their EOP assignment, etc. The P/EIO also keeps employees clearly informed of developing storm conditions. **Functional managers verify and report EOP readiness** Make an early ID of shortfalls and take corrective actions as necessary (roster, supplies, personnel, facilities, ice machines, telecommunications, generators, etc.). **Branch directors leaders initiate communication with EOP-assigned employees** Keep EOP assigned employees clearly informed of developing storm conditions and notify them to begin preparations for manning their EOP assignments. Confirm information for EOP team members.

Phase	Description
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%	**RTO implements storm updates using email and text messaging systems** RTO 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 as to direction/intensity of storm.
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%	**Incident Commander declares EOP activation** The Incident Commander makes recommendations for this action based on latest updates from StormGeo. **The Resource Acquisition group contacts Regional Mutual Assistance Groups (RMAG's) as needed to set up mutual assistance conference calls.** CNP 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. Following is their contact information: S.E.E. – Contact any S.E.E. staff member at 404-233-1188 and let them know you wish to hold a conference call for storm response. Refer to the S.E.E. Mutual Assistance Procedures and Guidelines, Section 9.3, for additional information. Midwest – CNP may contact EON-US (Shenita Gazaway 502-627-3925 or David Guy 502-627-4104) to request that a Midwest conference call be set up. Texas – CNP may refer to the Texas Mutual Assistance Conference Call Guidelines. CNP may send an e-mail to each member on the roster announcing a conference call, and provide a 1-800 conference call number with password. **Logistics section makes lodging arrangements** This action is taken in preparation to accommodate CNP personnel that are storm riders and first responders that must evacuate according to the Harris County Office of Emergency Management. These activities continue as more zip codes are evacuated. The Lead Hotel Coordinator should book hotel space based as CNP head count determined. **P/EIO implements communications plan/activate storm hotline**

Phase	Description
	Finance submits a request for cash to Treasury **Logistics section secures food beginning 48 hours after the landfall** Operations section secures enough food to feed personnel at all EOP 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 and Baytown Service Center evacuations in conjunction with evacuation plans for Harris and Galveston counties. Baytown Service Center will evacuate to Humble Service Center. Galveston Service Center will evacuate to South Houston Service Center. **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. **Telecom executes cell relay/DCE extensions to maximum days** **Grid & Market Operations sends communications to Texas market regarding possibility of interruptions regarding meter data** **Operations assesses the operability of production IG devices** **Telecom considers securing satellite telephone rentals** Telecom Services will evaluate need of rental satellite telephones for the staging site supervisors. **Telecom considers securing portable voice radio rentals** Telecom Services will evaluate need of 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%	**Incident commander conducts conference call** Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event

Phase	Description
	• type of event • damage projection • time of impact • duration of event • EOP timeline status • plan for recovery • level of preparedness • communications **Logistics alerts material and logistics suppliers** The Logistics sections provide these suppliers with advance notice to begin making their preparations to supply CNP 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** The Logistics section delivers the remaining EOP material and bedding to service centers in advance of evacuations. **Logistics analyzes EOP 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. **Logistics alerts staging site owners** Staging site supervisors make preliminary contact with the staging site owners to notify them of our possible intent to activate our contracts with them. **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

Phase	Description
	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 in a face-to-face meeting. The main objective is to provide an update 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 Incident Command Center** CNP will: • Ensure all systems and equipment at the Incident Command Center are functioning properly • Obtain supplies as needed; set up rooms as planned • Set up computers, telephones, Satellite TV access • Test communications • Ensure that the Incident Command Center phone number rings at that location. **The Public/Employee 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 Evaluation Centers** Telecom visits each evaluation center and tests its radio for operational performance.
8 - The worst case scenario for 39 mph winds reaching this location is < 48 hours and	**Logistics updates logistics and material suppliers**

Phase	Description
the probability of 58 mph winds impacting this location is > 30%	The Logistics section provides these suppliers with updated information to assist them in their preparations to supply CNP storm requirements. **Logistics updates staging site owners** Staging site supervisors 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 EOP storm needs. Based on severity of storm, Fleet will contact potential users of rental vehicles to determine pre- and post-storm needs, and 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 mph wind impacting this location is > 50%	**Conduct operations conference call** Distribution Operations branch managers, SADs, and service center operations conduct a conference call to determine progress of preparation. **Logistics section activates logistics (suppliers, caterers, etc.)** At the direction of Operations, the Logistics section engages logistics suppliers to execute CNP EOP logistics plan. **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 PEIO/management communicates with employees regarding EOP show up time** **Logistics activates staging sites as required at the direction of Operations** Logistics begins activating staging sites. They continue to update staging site owners if we will use or not use their facility.

Phase	Description
	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%	Incident Commander and Section chiefs conduct conference call Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event • type of event • damage projection • time of impact • duration of event • EOP 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.
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 and/or Baytown access** Once Harris and Galveston Counties have been evacuated and restrictions put in place by government entities, CNP 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**

Phase	Description
	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 am to 9 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 pm to 9 am) to ride out the storm and continue to work that shift throughout the restoration. **Incident Commanders conducts leadership conference call** Potential topics to cover: • actual or expected storm category • storm condition • trouble level of the event • type of event • damage projection • time of impact • duration of event • EOP timeline status • plan for recovery • progress of preparedness • communications

Phase	Description
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** 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 conference call to determine impact to their facility, equipment and ability to operate. They also report any initial damage assessment. Activate helicopters 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** Public/Employee Information Officer 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. **Logistics sets up staging sites** The Staging Site Managers within Logistics report on the progress of staging site setup to the Logistics Section Chief. The Logistics Section Chief will provide updates to Operations as needed. **Security director activates security and traffic control**

Phase	Description
	The director of Security, in the Logistics sections, works with local authorities to provide access for CNP personnel conducting restoration activities to storm-damaged areas. The director also provides security and traffic control for service centers and staging sites. Incident Commander and Section chiefs conduct conference call This is the first scheduled Incident Commander/Section chief update after landfall. The call may cover updated versions of the topics mentioned previously. **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 throughout the duration of the incident.

D. Command Centers

Upon activation of the EOP, the Company establishes evaluation centers. Assigned personnel at these evaluation centers act as data collection points for a variety of information such as specific system statuses, conditions, and restoration schedules. They also help CNP track progress for the following tasks:

- Coordination of logistical support and the assignment of manpower to support restoration priorities.
- Communication with outside utilities for assistance, arrival and departure schedules, and other coordination as needed.
- Information collected by these evaluation centers is relayed, compiled and displayed at the Incident Command Center.

Incident Command Center

The Incident Commander (IC) is responsible for establishing and operating the Incident Command Center located at the Greenspoint Annex – Room 1550. If necessary, a backup evaluation center will be stood up at the Bellaire Service Center Auditorium. Personnel will be assigned as necessary to make contacts with outside utilities using mutual assistance processes and the applicable agreements, posting

information as provided by other evaluation centers, and supporting other resource needs. Staffing requirements for the Incident Command Center will be based on a 24-hour operational period and will be staffed in 12 or 16-hour shifts as the Incident Commander deems appropriate based on the needs of the response efforts.

Access to the Incident Command Center is limited to assigned duty employees, command staff, and appropriate Company officers.

Activation of the Incident Command Center

At the discretion of the Incident Commander, storm riders must report to the Incident Command Center when specified by the IC. Advanced authorization may be appropriate when fully staffing the center if, in the judgment of leadership, it is necessary to avoid later unsafe road conditions and other possible hazards such as dangerous wind speeds.

Operation of the Incident Command Center

Initial activation of the Incident Command Center will be for the purpose of assessing the status of preparation by departments. The Incident Commander is responsible for scheduling and communicating the requirement for periodic conference calls to assess the status of preparation by the various departments. As the event approaches and crosses CNP's service area, personnel at the Incident Command Center will collect data on system conditions and customer outages initially from EC/DC. In order to ensure a continuing, accurate and consistent flow of information into the Incident Command Center, communications will be established only through the following points for reports issued by the Incident Command Center:

- Real Time Operations (RTO) at Addicks Operations Center (AOC)
- The Distribution Evaluation (DVAL) Center at Greenspoint Service Center
- The Underground Evaluation Center at Harrisburg Service Center
- The Transmission and Substation Evaluation Center at EC/DC

Distribution Evaluation Center

The Director of Distribution Operations will be responsible for establishing a Distribution Evaluation Center in the Greenspoint Service Center, 2nd Floor. The Operations Branch Director will staff and assign personnel as appropriate to the Distribution Evaluation Center 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 section chiefs 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 Evaluation Center room. 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 Incident Command Center via the scheduled periodic conference calls. Staffing requirements will be based on 16-hour shifts with adjustments as deemed necessary by the Incident Commander. Access to the evaluation centers shall be limited to assigned duty employees, interface personnel, and appropriate Company officers.

Activation of the Distribution Evaluation Center

The Distribution Evaluation Center shall be activated to assess and direct restoration activities and will be accomplished in coordination with the Incident Command.

Upon activation of the Incident Command, a report of readiness to the Incident Command Center will be required. The decision to staff the evaluation center prior to storm impact should be made based on projected accessibility after the event passes. In most cases, assessment of damage cannot begin until:143

- Daylight hours have arrived
- Flooding has receded
- Field personnel or helicopters can be safely sent into the impacted area

Operation of the Distribution Evaluation Center

The Distribution Evaluation Center is responsible for providing accurate and consistent information on a timely basis concerning the extent of damage to the distribution facilities, the plans to restore service, and the progress being made in executing that plan in their respective service centers and staging sites. CNP will need to use re-dedicated manpower or crews from

neighboring utilities or contractors. In order to achieve timely restoration, Resource Acquisition reports that information to Incident Command as soon as the information is available

Underground Evaluation Center

The Major Underground Manager will be responsible for establishing an evaluation center 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 Evaluation Center reports up through the Distribution Operations Branch Director.

Transmission and Substation Evaluation Centers

The Transmission / Substation Branch Director, or their designee, will be responsible for establishing the Transmission and Substation Evaluation Centers 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 Incident Command per the update schedule determine 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.

Activation of the Transmission and Substation Evaluation Centers.

Activation of the Incident Command will require a report of readiness from each evaluation center to the Incident Command Center, though staffing may not be necessary. The decision to staff the evaluation centers will be made based on accessibility both before and after the event passes. Preemptive steps may be taken to avoid or minimize system damage. In most cases, assessment of damage cannot begin until daylight hours and field personnel or helicopters can

be safely sent into the impacted area. Once the evaluation centers are fully staffed, a report will be made to Incident Command.

Operation of the Transmission and Substation Evaluation Centers

The Transmission and Substation Evaluation Centers are responsible for providing accurate and consistent information to the other evaluation centers on a timely basis. The Transmission and Substation Evaluation Centers will provide this information as the event develops and passes through the area, and will concern:

- Transmission network conditions
- The extent of damage to Transmission and Substation facilities
- The projected restoration of service plan
- The progress being made in executing that plan
- The need for and the ability to use re-dedicated manpower or crews from neighboring utilities to achieve timely restoration

Logistics Command Center

The Managers of Supply Chain, Procurement and Logistics are responsible for establishing the Distribution Material Evaluation Center at South Houston Materials Management, Building A. The Distribution Material Evaluation Center may relocate, as appropriate, to another CNP office facility. This location will be selected based on storm damage proximity and available office space. Alternate locations include the Cypress, Sugarland, and Spring Branch Service Centers. Personnel will be assigned as necessary to ensure that distribution material issues are resolved quickly and support the overall restoration effort. Details as to staffing, activation, operation, and communications are contained in the departmental plan for Logistics.

Annex F

Cyber Security Annex

CYBER SECURITY ANNEX

1. INTRODUCTION

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 initiate actions, procedures, and/or practices to stabilize any impact to business or operational systems which may jeopardize employee or public safety, or may result in material consequences to employee or customer information, or will result in interruption of business continuity. It is incumbent upon the user 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 have occurred. To detect, respond, and manage violations, incident response policies and procedures should be in place to minimize risk as well as facilitate recovery from a violation.

1.1. Purpose

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 quickly and efficiently recover from different levels of Information Security Incidents (as defined in Section 1.4).
- Define the business, Information Technology, 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 Information Technology Incidents response and incident management processes in order to establish a more effective strategy and response to future Information Security Incidents.

1.2. Scope

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

- The fundamental information actions and tasks needed for Information Technology personnel to provide incident response services to CNP's control system and/or related I.T. 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).

1.3. Issuing Authority

I.T. Director Corp Cyber Security, Corporate I.T. Cyber Security

1.4. Use of this Document

This document is designed to provide both the procedures and the essential tools (such as quick reference guides and checklists) for managing an Information Security Incident.

1.5. Maintaining this Document

This document will be subject to both planned reviews and continuous improvement activities. The document will be reviewed annually and approved by the Issuing Authority (Section 1.3). The CIRP will be reviewed during the follow-up meeting to every Information Security Incident initiation. Suggested improvements to the plan or to this document will be documented, sent to the Issuing Authority for approval and communicated to the individuals who have responsibilities within the process.

1.6. Training

It is essential training on the CIRP be performed regularly. All the key groups and roles described in the CIRP need both initial detailed training and periodic (at least annual) review training. Developing the training materials and conducting the training will be the responsibility of the Corporate I.T. Security Risk & Compliance group.

1.7. Process Improvement

In order to remain relevant and useful, this incident response plan needs to be continually improved. This is accomplished by enhancing the process documents with input from the lessons-learned sessions, conformance with industry standards and compliance with regulatory requirements. While this is a continuous process, it should occur at least annually.

2. SECURITY INCIDENT RESPONSE CAPABILITIES

2.1. Need for a Cyber Incident Response Plan

Cyber incident response is an organized approach to address and manage activities during and after an Information Security Incident. The goal of the CIRP is to handle the situation in an organized and effective manner, limit damage to the organization and reduce recovery time and cost. This CIRP provides guidelines on what constitutes an Information Security Incident and a process that must be followed when an Information Security Incident occurs.

2.2. Incident Preparation

To quickly respond to Information Security Incidents that could adversely affect the CNP environment, this CIRP should be followed to reduce the damage and minimize risk to the organization. The CIRT members should represent Subject Matter Experts ("SME") needed to help resolve the issue. Employees should be trained on how to respond to any suspicious activity.

2.3. Cyber Incident Response Team ("CIRT")

The CIRT is activated by the Director Corp Cyber Security or his/her designee.

The CIRT role is to provide a quick, organized and effective response to Information Security Incidents.

The CIRT's mission is to minimize serious loss of information, information assets and customer confidence by providing an immediate, effective and informed response to any event involving CNP's information systems, networks or control systems.

The CIRT is authorized to take appropriate steps necessary to mitigate and resolve a security incident. The team is responsible for investigating suspected intrusion attempts and loss of company information and assets in a timely manner. Additionally, the CIRT is responsible for reporting findings to management and to the appropriate authorities, as necessary.

Upon notification of an Information Security Incident requiring response, CIRT members must reprioritize their daily responsibilities to respond to the Information Security Incident and must have the appropriate level of authority to make decisions regarding risk and security measures.

2.4. Roles and Responsibilities

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 below with their roles and responsibilities during an Information Security Incident.

For each incident a contact list with assigned parties will be maintained.

2.5. Unavailability of Personnel

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 the list to the Director of Corp Cyber Security on a monthly basis.

2.6 Inner Organization Communications

In the event of a Priority Level 3 (Severity Level 2) Escalation or the Suspected Breach of Confidential Information, Initiate Contact with the following groups.

2.6.1 Legal Department/Data Privacy Office

Legal/the Data Privacy Office shall be notified immediately upon first indication of an Information Security Incident as well as when there is a material likelihood that confidential information has been affected by the Information Security Incident. If necessary, the Data Privacy Office will activate the Privacy Incident Response Plan. Consulting with legal counsel allows for guidance, direction, and ensures attorney-client privilege is appropriately attached

2.6.2 Corporate Response Plan Team

First Notify the Corporate Response Plan Team at Escalation to Priority Level 3 (Severity Level 2) in order to activate the Corporate Response Plan at the proper stage.

2.6.3 Technology Systems Control Center (TSCC)

First Notify TSCC at Escalation to Priority Level 3 (Severity Level 2) in order to activate the TSCC Incident Coordinator.

2.6.4 Corporate Communications

First Notify Corporate Communications at Escalation to Priority Level 3 (Severity Level 2)

2.6.5 Physical Security Team

First Notify Physical Security Team at Escalation to Priority Level 3 (Severity Level 2)

3. INCIDENT RESPONSE PROCEDURE

There are defined actions for the operational aspects of cyber incident response. Considerations should be given to specific incident-handling procedures and described in detail. The internal procedures are intended to facilitate the appropriate assessment of an Information Security Incident and provide required resources for incident response based on the priority rating of the incident.

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

4. COMMUNICATION

Timely, relevant and authentic communication during an incident is critical to the resolution of the incident. The procedure outlined below is based on the Corporate Response Plan and must be observed for the duration of the CIRP. For further explanation, please reference the Corporate Response Plan.

5. INCIDENT RESPONSE PLAN TESTING

This CIRP should be tested periodically to ensure employees involved are aware of CNP environment. The I.T. Corporate Technology Security Director is responsible for planning and initiating the testing.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex G

Physical Security Incident Annex

Physical Security Incident Annex

Scope

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 CNP.

For CNP 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.

Section 1: Security Program Structure

100 Use of This Document

A. This document will be issued electronically and made available on the Corporate Security page of CNP Today Intranet for access by employees and contractors.

B. Mandatory items are indicated by the words “shall”, “will”, or “must”. Recommended items or practices are indicated by the word “should”.

101 Security Information Governance Council (SIGC) Responsibilities

The Security Governance Council (SIGC) is responsible for helping to develop and maintain security policies, coordinate compliance with the policies, and assist individual business units and functional groups with mitigating potential security risks.

102 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.

103 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.

104 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.

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.)

Section 2: Protection of People and Assets

201 Suspicious Persons and Activities

A. All employees should be aware of their work surroundings and report any and all suspicious persons or activities the employee may observe.

B. Suspicious persons or activities could include:

1. Unknown persons or vehicles in the work area.
2. Transients.
3. An employee in an area they do not belong.
4. Persons loitering near company property or work areas.

C. Indicators of suspicious surveillance of the company:

1. Demeanor of the individuals (Do they avoid eye contact?)
2. Do they appear interested in something that is not there or that would not normally hold long periods of interest?
3. Do they appear to be taking measurements with their feet/stride, vehicle (driving a pattern), or using a range finder?

4. 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.
5. Observations of security procedures or staffing positions.
6. Discreet or unusually suspicious use of cameras or video recorders, sketching or note taking, particularly of or about sensitive areas or restricted access points.
7. Unusual or suspicious interest in speaking with building maintenance personnel.
8. Observations of or questions about facility security measures, to include barriers, restricted areas, cameras, and intrusion detection systems.
9. Observations or questions about facility air conditioning, heating, or ventilation systems.
10. Attempted or unauthorized access to rooftops or other potentially sensitive areas.

D. 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.

1. Should you observe suspicious persons or activities report it immediately to:
   - Your supervisor.
   - Corporate Security.
2. Call 911 immediately if a crime is occurring or the situation appears dangerous or threatening.

202 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.

A. 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.

B. 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.

C. Employees should be 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."

D. 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.

203 Trespassers

A. Trespassers are not permitted on company property.

B. If trespassers are found upon company property, take the following actions.

1. If your facility has a security officer, notify the security officer immediately so the person(s) can be removed.
2. If no security officer is at your facility, then notify your supervisor or building management.
3. If you feel safe to do 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.
4. When the police arrive they will ask you if you want to trespass the person. 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.

Section 3: Physical Security Support to EOP for Non-Security Related Activations

301 Staging Site Security

Corporate Security coordinates staffing assignments for security guards and off-duty law enforcement to secure crew staging sites. Corporate Security also oversees the work of security coordinators assigned to staging sites.

302 Crew Security

Corporate Security coordinates the assignment of off duty law enforcement and/or security guards, as requested by business unit leadership.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

Annex H

Mobile Generation/Long Lead Time Facilities Annex

Temporary Mobile Generation ~~Annex~~

As a result of amendments to PURA in the 2021 Texas Legislative session, TDUs may lease and operate facilities for temporary emergency electric energy to aid in restoration for distribution level customers during "a widespread power outage" (defined as an event that results in a loss of electric power that (A) affects a significant number of distribution customers of a transmission and distribution utility and (B) has lasted or is expected to last for at least eight hours, and is a risk to public safety) in which load shed has been ordered or the TDU's distribution facilities are not being fully served by the bulk power system under normal operations.[1]

In accordance with applicable statutes,[2] CEHE has entered into a lease agreement with a mobile generation provider to secure emergency back-up generation capacity, with the lease agreement ending on June 30, 2029. This lease agreement also extended the lease term for certain temporary mobile generation units that CEHE had previously leased under a short-term lease agreement. CEHE has leased up to approximately 500 MW of temporary mobile generation units, with actual output depending on ambient and other operating conditions. CEHE has the following temporary mobile generation units to deploy, if necessary:

- Up to fifteen (15) mobile gas turbine generator sets capable of providing approximately 30 MW or more of power each depending on ambient and other operating conditions.
- Up to five (5) mobile gas turbine generator sets capable of providing approximately 5 MW or more of power each depending on ambient and other operating conditions.
- Appropriate support resources within prescribed times to transport and operate the equipment.
- CEHE expects to be able to operate the equipment until either the deactivation of the EOP or until affected customers are eligible to receive service (i.e. the statutory requirements are no longer met). Depending upon storm severity, this could range from 1-6+ weeks.

[1] Public Utility Regulatory Act, Tex. Util. Code §§ 39.918 ("PURA")
[2] *Id.*

Finally, based on system needs, and in coordination with appropriate government officials and regulators, CEHE will determine the potential location(s) where the back-up mobile generation facilities will 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 EOP event.[3] Some back-up mobile generation facilities listed above have been pre-positioned at certain locations in CEHE's service area. Under the long-term lease agreement, the mobile generation provider must provide transportation and assembly services if mobile generation facilities need to be relocated. CEHE will coordinate with the mobile generation provider in the event that the pre-positioned mobile generation facilities need to be relocated to other locations in CEHE's service area during an EOP event as operating conditions, road conditions, and other safety considerations permit.

CEHE's operation of back-up mobile generation facilities during an EOP event is not a guarantee against fluctuations, irregularities, or interruptions in delivery service. CEHE's operation of back-up mobile generation facilities is 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.

As referenced previously, the Company utilizes three emergency activation levels, designed to ensure sufficient resources are available to effectively respond to any type of event impacting 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.

[3] PURA §§ 39.918 (g)

Long Lead Time Facilities

The Texas legislature amended the Public Utility Regulatory Act, adding § 39.918 Utility Facilities for Power Restoration After Widespread Power Outage. As a part of this statutory revision subsection (b)(2) addressed the need for transmission and distribution utilities ("TDUs") to have long-lead time facilities.

The statute authorizes TDUs to take proactive measures to ensure they have the facilities necessary to aid in restoring service to customers following a widespread power outage, which is defined in the statute as an event that results in a loss of electric power that affects a significant number of TDU distribution customers and has lasted or is expected to last for at least eight hours and is a risk to public safety. Subsection (b)(2) specifically permits a TDU to "procure, own, and operate…transmission and distribution facilities that have a lead time of at least six months and would aid in restoring power to the utility's distribution customers following a widespread power outage." The statute further excludes from long-lead time facilities electric energy storage equipment or facilities under Chapter 35 of the Utilities Code. Subsection (h) states the "commission shall permit" a TDU that "procures, owns and operates facilities under Subsection (b)(2) to recover the reasonable and necessary costs of procuring, owning, and operating the facilities, using the rate of return" from the TDU's last base rate proceeding. Based on the statute, long-lead time facilities are those that take at least six months to acquire and would be used to restore power after a widespread outage.

The Company interpreted Sec. 39.918(a) to apply to any widespread power outages resulting from several natural or man-made causes, including, but not limited to: tornados, hurricanes, microbursts, flooding, extreme heat/cold, fire events, or an intentional attack on the electric grid e.g., terrorist events, cyber-attacks. Given this statutory language, the Company undertook an evaluation to identify the facilities that are critical to restoring electric service following widespread power outages with a lead time of at least six months.

As a result of this regulation, the Company has added a specific long lead time facility (LLTF) designation for qualifying material items. Materials items are reviewed monthly to validate the long lead time and widespread power outage criteria are met. When both criteria are met, the material item is determined to be a qualifying LLTF material item and are designated as such.