



Emergency Operations Plan (EOP) Requirements and Filing

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Agenda



- The purpose of this informational webinar is to explain Emergency Operations Plan (EOP) requirements. Topics to be covered:
 - Statutory authority
 - Applicability to operators
 - Filing deadline
 - How to file
 - Contents of EOP
 - Q&A

Statutory Authority (1 of 4)



- Texas Utilities Code § 186.008, *Railroad Commission Weather Emergency Preparedness Reports*
- Section 186.008 requires the Commission to analyze EOPs developed by operators and prepare a Weather Emergency Preparedness Report on weatherization preparedness
- Commission must file the report with the Legislature, Lt. Gov., and Speaker of the House not later than September 30 of each even-numbered year

Statutory Authority (2 of 4)



- In preparing the report, the Commission shall:
 - Review EOPs;
 - Analyze and determine ability of electricity supply chain to withstand extreme weather events;
 - Consider anticipated weather patterns; and
 - Make recommendations on improving EOPs and procedures to ensure continuity of natural gas service for the electricity supply chain.

Statutory Authority (3 of 4)



- The Commission may adopt rules regarding the implementation of the Report
 - Commission Staff is exploring whether to initiate a rulemaking at a later date
- The Commission shall require operators to file an updated EOP if the EOP on file does not contain adequate information to determine whether the operator can provide “adequate natural gas services.”

Statutory Authority (4 of 4)



- EOPs are public information except for portions of the plan considered confidential under Chapter 552, Texas Government Code (the Public Information Act) or other state/federal law.
- If portions of the plan are confidential, the plan shall be provided to the Commission in redacted form for public inspection.

Applicability to Operators



- Section 186.008(a) states that the Commission shall analyze EOPs of operators that:
 - (1) produce, treat, process, pressurize, store, or transport natural gas; AND
 - (2) are included in the electricity supply chain map adopted by the Texas Energy and Electricity Supply Chain Mapping Committee (see Tex. Util. Code sec. 38.203).

Filing Deadline



- EOPs are due on **August 1, 2022**
- Operators on the supply chain map should have received a letter from the Critical Infrastructure Division on May 25 and 26, 2022

Filing Details (1 of 5)



- EOPs shall be filed through the Critical Infrastructure Division Portal on RRC Online System
- This is the same portal through which CID filings are submitted
 - <https://webapps.rrc.texas.gov/security/login.do>
 - To request an RRC Online login, call (512) 463-7229 or email rrconline-security@rrc.texas.gov.
- Each operator is required to submit 1 unredacted EOP. Each operator may submit 1 redacted EOP in addition to the unredacted version


Filing Details (2 of 5)



- The EOP function in RRC Online System will be available on July 1, 2022
- The portal will close at midnight on August 1, 2022

Filing Details (3 of 5)





Railroad Commission of Texas

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Critical Infrastructure Designation

No Unredacted EOP documents on file : The operator 630555 does not have the required Unredacted EOP documents uploaded. Please use the 'Upload EOP Data' on the

Dashboard

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	Application Id	Facility Name	Well Type	Upload Type	Application Status	Fi
Actions	325975	WILLARD UNIT 001WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325974	WEST SEMINOLE SA UNIT 3WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325973	WEST SEMINOLE SA UNIT 2WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325972	WEST MERCHANT 1401WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325971	UNIVERSITY 53 15	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325970	UNIVERSITY 30 1HH	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325969	SHARON RIDGE CANYON UNIT 4011W	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325968	OSPREY '9' 902	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325967	"OSPREY "'9"' 903"	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325966	"OSPREY "'9"' 9"	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325965	NORMAN 6D	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325964	NORMAN 4 SWD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325963	MERCHANT 1601WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325962	MARIINSKY STATE 8 2W	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325961	MARIINSKY STATE 8 19	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325960	MARIINSKY STATE 8 18	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325959	MARIINSKY STATE 8 17	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325958	Jones Odonnell 1WD	Saltwater Disposal Wells	CID	Payment Not Required	
Actions	325957	DORA ROBERTS RANCH 2901 D-2-1 SWD	Saltwater Disposal Wells	CID	Payment Not Required	

Filing Details (4 of 5)



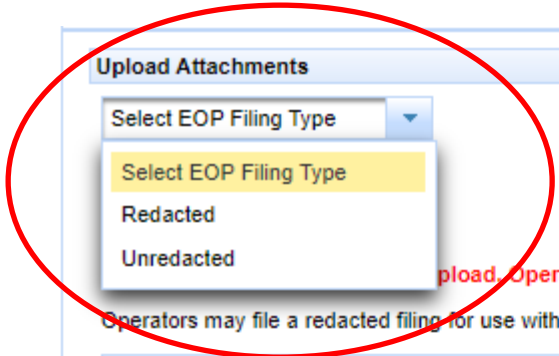
Upload Attachments

Select EOP Filing Type
Select EOP Filing Type
Redacted
Unredacted

Upload. Operators are required to file at least one unredacted file for their EOP filings.
Operators may file a redacted filing for use with Open Records Requests if confidential information is contained in the documents.

Attachment List

Attachment Name	Attachment Size	Attachment Type
No Attachments found.		



Filing Details (5 of 5)



Upload Attachments

Unredacted

2022 Submission

Select file for EOP Information upload. Operators are required to file at least one unredacted file for their EOP filings.

Operators may file a redacted filing for use with Open Records Requests if confidential information is contained in the documents.

+ Choose EOP Upload PDF File

Attachment List

Attachment Name	Attachment Size	Attachment Type
AUnredacted EOP.pdf-15-06-2022-01-36	193013	UnRedacted

Submit

Cancel

EOP Contents



EOP should address and include the following at a minimum:

- Introduction Section
- Communication
- Preparedness
- Testing
- Staffing
- Weather Related Hazards
- Exercises/Drills
- EOP Activation
- Restoration of Service
- Emergency Contacts

EOP Required Information



- Each company should submit one EOP for facilities operated by the company that meet the statutory criteria.
- If your company has more than one EOP, combine them into one submission.

Introduction Section (1 of 2)



- Table of Contents
- Legal name of company and Commission issued Form P-5 number
- System(s) Overview including general location and types of facilities
- Summary describing how relevant personnel receive training on the applicable contents and execution of the EOP
 - Affirmation required that relevant personnel have received such training



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



EOP Internal Communication section should include methods and procedures for communicating within the company during an emergency

- Include primary and secondary means of communications
- Contact information for key employees



EOP External Communication section should include the methods and procedures during an emergency for communicating with:

- Critical customers
- State and local emergency operations centers (EOCs)
- Applicable local and state governmental entities and officials
- Commission
- Media (be prepared)



- EOP Preparedness Section should address the following intended for emergency response:
 - Pre-identified supplies
 - Parts
 - Equipment

Staffing



EOP should have a detailed plan that addresses staffing during emergency response.



EOP should include methods and documentation to function-test existing equipment ahead of emergencies to verify functionality.

- Back-up generation
- Critical failure components

Hazard Responses



EOP should include plans that addresses how your company and facilities identify weather-related hazards **as they apply to your specific geographical area**, including:

- Tornadoes
- Hurricanes
- Extreme cold weather
- Extreme hot weather
- Rolling blackouts
- Drought
- Flooding

Exercises/Drills



EOP should include the following for Exercises and Drills:

- Frequency and results of tabletop and/or simulated event exercises and/or tests performed; and
- Issues identified and corrective actions taken as a result of exercises, tests, and actual emergencies.

EOP Activation



- EOP Response section should include the process the company follows to activate the EOP; and
- The response actions during an emergency once the EOP is activated such as personnel, transportation, communications procedures and the location, use, and maintenance of emergency supplies and equipment.

Emergency Contacts



Should include an Emergency Contact Annex that lists primary and backup emergency contacts for critical facilities (including identification of specific individuals wherever possible) who can address urgent requests for supplies, services, and other support to each facility.

Restoration



EOP should have a detailed plan on Restoration of Service Section that discusses procedures for return to service following disrupted operations.

Q&A



- Please put your questions in the chat.