Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

SUMMARY

This procedure provides instructions for implementing the Elkhorn Battery Energy Storage System (BESS) Emergency Action Plan (EAP) including immediate requirements, points of contact, and follow up actions that should be taken by power plant personnel in the event of, but not limited to, the following:

- Thermal Overtemperature Event
- Fires (electrical fires, and battery fire)
- Accidents involving serious injury or death
- Oil, hazardous waste, or chemical spills
- Earthquake
- Physical Threat (Active Shooter or Intruder)
- Bomb threat
- Emergency plant shutdown
- Severe weather
- Tsunami Alert
- Station Power Loss

Level of Use: Continuous Use

NOTE

Double asterisks (**) following any text in this document identify that text as Regulatory Compliance Related and may not be modified or deleted before consulting with the Compliance Program Manager.

TARGET AUDIENCE

All facility and EOC personnel and Operators.

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SAFETY

Death, incapacitation, or personnel injury can result from exposure to emergency situations.

Personnel injury or equipment damage may occur from the following:

- Arc-flash and electrical hazards from energized electrical equipment
- Slips, trips, and fall hazards
- Hazards associated with heights
- High noise level hazards
- Chemical or environmental hazards
- Wildlife, pest, reptile, or insect hazards
- Incorrect operation of equipment

BEFORE YOU START

1.1 REFER TO Appendix A, Roles and Responsibilities, as necessary.

1.2 REFER TO Appendix B, Incident Command (Assembly Point) and Other Equipment, as necessary.

NOTE

Elkhorn is equipped with several alarm triggering mechanisms to communicate a hazard exists.

1.3 CONSIDER the following:

1. Battery system is equipped with over-temperature alarms that will warn operators and sound an audible alarm at the BESS.
2. Battery field has flame detectors that will detect heat from flame of sufficient size.
    a. There are flashing strobe and siren indicators to alert personnel that the sensors have been tripped.
3. Inside Switchgear, there is a separate system of smoke detectors that trigger an alarm inside the switchgear enclosure.

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PROCEDURE STEPS

1 Emergency Action Plan (EAP) Triggers and Symptoms

1.1 IF any of the following events OR symptoms occur:

1. Setting off alarms.
2. Any degree OR amount of fire OR smoke.

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1.1 (continued)

3. Injuries OR illness as displayed by, but NOT limited to, the following:
   - Bleeding
   - Fainting
   - Vomiting
   - Lack of consciousness
   - Bodily pain
   - Difficulty breathing
4. Any spilling OR leakage of hazardous chemicals, steam, OR natural gas from their normal containment systems.
5. Any shaking OR movement of facility.
6. Extreme weather creating unsafe working conditions.
7. Any announced security threat, whether implied OR actual.

   THEN INITIATE EAP.

2 Emergency Telephone Numbers

2.1 As needed OR annually, UPDATE contact information in Appendix C, Emergency Contact List.

3 General Emergency Response Information

NOTE

Emergencies fall into two categories in terms of response:

- Those requiring notification of an external emergency response agencies.
- Those not requiring notification of an external emergency response agencies and can be managed by Company personnel.

3.1 ALLOW company personnel to manage emergencies such small chemical spills limited to the work site.

1. ENSURE all materials used to contain a spill classified AND managed properly for disposal.

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3.1 (continued)

2. CONTACT Environmental Field Specialist (EFS) OR Environmental Hotline for assistance.

3.2 In event of fire, use of fire suppression water, chemical OR oil release, CONTACT Site Environmental Field Specialist (EFS).

1. IF EFS NOT available,

   THEN CONTACT PG&E Environmental Hotline at (800) 874-4043 to contact On-Call EFS.

2. EFS FOLLOW ENV-5101P-01 Agency Notification Procedure for Release of Hazardous Substances.

3.3 IF External Emergency Response required,

THEN:

1. Operator CALL 911 to notify regional dispatch of an emergency.

NOTE

Once North County Fire Protection District (NCFPD), or other responding fire agency, arrives, they will assume the role of Fire Incident Command (IC), as the designated Authority Having Jurisdiction (AHJ).

IF first arriving PG&E employee (e.g., Operator, Moss Landing Supervisor, etc.) is trained AND qualified,

a. IF first arriving PG&E employee (e.g., Operator, Moss Landing Supervisor, etc.) is trained AND qualified,

   THEN first arriving PG&E employee ASSUME role of initial Incident Commander.

2. Operator NOTIFY Power Generation (PGEN) On-Call Supervisor:

a. IF at Moss Landing,

   THEN CONTACT Moss Landing Supervisor.

b. REQUEST PGEN Supervisor reply with estimated time of arrival (ETA) AND contact info of responding Qualified Electrical Workers (QEWs).

c. PROVIDE contact info to 911 dispatch.

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3.3 (continued)

3. Operator NOTIFY vendor 24/7 contact number with site AND available event information.

4. Operator NOTIFY Environmental Field Specialist (EFS).

   a. IF EFS NOT available,

      THEN CALL PG&E's Environmental Hotline at [redacted] to contact the On-Call EFS.

5. Operator NOTIFY Hazardous Awareness Warning Center (HAWC) at [redacted] to request dispatch of Public Safety Specialist (PSS) AND an Emergency Management Specialist (EMS) to serve as an Incident Command (IC) Technical Advisor.

6. Renewables Supervisor DISPATCH Renewables QEW's and NOTIFY PGEN Fossil/Renewables Director of event.

   a. COMMUNICATE the following back to operator:

      (1) ETA of substation resources.

      (2) ETA of Renewables Supervisor.

7. First responding PGEN QEW:

   a. ASSESS situation and PROVIDE escort for responding emergency services to Incident Command location (see Section 3, General Emergency Response Information, for details).

   b. ASSUME PG&E Initial Response Incident Commander role:

      - IDENTIFY incident (e.g., what is involved).
      - CONTACT 911.
      - PERFORM accountability of personnel in area and DIRECT to safe location.
      - ISOLATE energy, if possible (e.g., close valve, open breaker, activate "EMERGENCY STOP BUTTON" — Battery isolation from Utility Grid at 21kV, etc.).
      - CONTROL site access and DO NOT ALLOW coworkers to reenter.

3.3.7.b (continued)

- CONTACT PG&E leadership (SEE Appendix C, Emergency Contact List).
- MEET first responder Authority Having Jurisdiction (AHJ) on site to provide status of incident, copy of EAP and PFP, and PROVIDE technical subject matter support until relieved.

8. IF outage is experienced OR required,

   THEN Operator DOCUMENT event in Operator's Log of Outage and Dispatch Management System (ODMS).

   a. INLCUDE the following:

      - Who was contacted
      - Time of call
      - Nature of emergency
      - Any instructions given by alerted agency

9. For market participating resources, Operator NOTIFY Real Time (RT) Desk of outage.

   a. RT Desk ENTER outage into OMS and NOTIFY CASIO Control Center.

10. Operator NOTIFY additional required contacts (e.g., Vendor 24/7 Contact, BESS Operations Support Email).

3.4 IF Internal Emergency Response is sufficient to address emergency,

THEN:

1. Operator NOTIFY Substation On-Call Supervisor.

NOTE
At Moss Landing, direct contact to Moss Landing Supervisor is first attempt then on-call as backup.

   a. IF at Moss Landing,

      THEN CONTACT Moss Landing Renewables Supervisor.

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3.4 (continued)

2. WHEN emergency vendor support is available,

   THEN Operator NOTIFY vendor 24/7 contact number with site AND available event information.

   a. SEE Appendix C, Emergency Contact List.

3. Renewables Supervisor dispatch PGEN QEWs and NOTIFY PGEN O&M Fossil / Renewables Director of event.

4. COMMUNICATE ETA of substation resources back to Operator.

5. IF outage is experienced OR required,

   THEN Operator DOCUMENT event in Operator's Log of ODMS.

   a. INLCUDE the following:

      - Who was contacted
      - Time of call
      - Nature of emergency

6. Operator NOTIFY additional required contacts (e.g., RT Desk, BESS Operations Support Email with event details and ODMS or equivalent outage record management system record).

NOTE

CAISO Tariff Section 9.3.10.3.1(b) requires notification within 30 minutes of Operator awareness of outage.

   a. IF site is CASIO market participating,

      THEN NOTIFY Real Time Desk.

   b. IF site has related Grid Control Center (GCC) / Distribution Control Center (DCC) managed neighboring facilities,

      THEN Operator NOTIFY appropriate control center.

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3.5 Personnel First Response

1. REPORT each incidence of any of the following to 911 operator:

   - Fire
   - Personal injury or illness
   - Uncontrolled Hazardous material spill
   - Security threat
   - Damaging OR destructive events (e.g., automobile accident)

3.6 Personnel Secondary Response

1. IF safe to do so AND appropriate Personal Protective Equipment (PPE) is available,

   THEN:

   a. Qualified personnel APPLY first aid as needed.

   b. BLOCK, ISOLATE, or otherwise STOP any fuel source from exposure to fire.

   c. BLOCK, ISOLATE or otherwise SECURE source of chemical release.

   d. SECURE damaged OR unsafe area.

   e. USE appropriate fire extinguisher on any applicable fire.

3.7 IF emergency requires notifying an emergency response agency,

THEN after emergency service is on its way to power plant, Battery Technician PERFORM the following:

1. NOTIFY Renewables supervisor OR PGEN On-Call supervision.

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3.7 (continued)

2. DOCUMENT following items in Electronic Log (by calling Fresno Operating Center (FOC)):

   - Who was contacted
   - Time of call
   - Nature of emergency
   - Any instructions given by alerted agency

3.8 IF an emergency does NOT require an emergency response agency,

THEN CONTACT plant manager OR supervisor.

4 Thermal Overtemperature Event

NOTE

Elkhorn has a siren and flasher that will activate when either temperature alarm is activated. It will sound the same as a fire alarm but does not de-energize the site.

4.1 WHEN alert of Over-Temperature or Thermal Event Active occurs,

THEN Fresno Operating Center (FOC) Operators:

1. CONTACT Tesla Hotline [redacted] and SELECT option for 'urgent' to report event in progress.
2. REVIEW logs AND cameras to determine whether personnel are on-site
3. IF NO personnel on site,

   THEN SILENCE alarm.
4. DISPATCH PGEN QEWs or CONTACT personnel on-site.
5. CONTACT the Environmental Field Specialist (EFS) or the PG&E Environmental Hotline at [redacted].
6. CONTINUE to Step 4.3 to MONITOR event.

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4.2 WHEN alert of Over-Temperature or Thermal Event Active occurs OR upon arrival on site,

THEN on-site personnel PERFORM the following:

1. IF on-site when alarm activates,

   THEN:

   a. STOP work and EVACUATE BESS facility.

   b. USE main access road around BESS to EXIT.

   c. ASSEMBLE at Incident Command Building located adjacent to 115kV MPAC Building, OR at an alternate location (e.g., Maintenance Office Building, etc.) as directed by Incident Commander (IC).

2. IF responding to active alarm OR after evacuating BESS facility,

   THEN:

   a. OPEN Incident Command Building and ESTABLISH Incident Command (IC).

      (1) Depending on incident variables (e.g., nature of event, wind direction and speed, etc.), IC may be relocated to an alternate location.

   b. ASSIGN Initial Response Incident Commander role to coordinate on-site activities.

   c. CALL FOC and PROVIDE the following.

      - Identity of Incident Commander(s)
      - Count of persons at assembly point
      - Whether any persons require medical attention
      - Count of unaccounted persons

   d. MONITOR and COORDINATE with FOC and TESLA using HMI AND screens in Incident Command Building.

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4.3 MONITOR event.

1. IF smoke/flames are observed,

   THEN INITIATE Fire section of this EAP.

2. IF alarm progresses to Thermal Event Active,

   THEN:

   a. FOC USE SCADA controls to DE-ENERGIZE appropriate 21kV breaker.

   b. NOTIFY (NCFPD Dispatch (831) 424-1851) of developing event.

   c. CONTINUE to monitor situation.

   d. IF alarms clear AND temperatures return to normal,

      THEN DE-MOBILIZE IC (if established by on-site personnel) and COORDINATE with FOC and Tesla on safe return to normal operations.

5 Fire (Fuel or Electrical)

5.1 Battery Storage Technician CALL 911 to report any fire.

5.2 IF plant personnel extinguish fire,

THEN PROHIBIT cancelling emergency services.

5.3 WHEN fire reported,

THEN Renewables Technician:

1. ANNOUNCE fire over plant radios to ensure personnel clear out.

2. POST Fire Watch at small fires extinguished by incipient measures (available fire extinguishers).

3. NOTIFY PGEN supervisor OR Substation supervision.

5.4 WHEN fire reported,

THEN on shift FOC operator NOTIFY PGEN Renewables supervisor.

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5.5 As Fire Department responds, PG&E Initial Response Incident Commander:

1. DIRECT the following:

   a. Any available Battery Storage Technician **OPEN** gate when Fire Department vehicles arrive.

   b. Evacuation of unnecessary personnel if conditions warrant, following the Elkhorn Evacuation Plan (Supplemental Reference).

   c. Accounting for all personnel AND visitors.

   d. Assessment of extent of injuries AND missing people.

   e. Personnel to provide first aid.

2. PROVIDE access AND direction to emergency personnel.

3. PROVIDE advice AND assistance for rescue.

4. NOTIFY plant manager OR supervisor.

5.6 IF personnel observe fire, smoke, OR site fire alarm is sounding/flashing,

THEN:

1. STOP work and EVALUATE.

   a. IF fire does NOT involve a battery, can be safely extinguished, AND does NOT endanger personnel,

      THEN:

      (1) DETERMINE appropriate fire extinguisher.

      (2) ATTEMPT to extinguish fire.

      (3) LOOK OUT for developing hazards and RE-EVALUATE.

   b. IF fire CANNOT be safely extinguished OR situation otherwise becomes unsafe,

      THEN CONTINUE with this procedure.

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5.6.1 (continued)

2. EVACUATE in opposite direction of hazard, while taking into consideration wind direction and fire spread.

NOTE

Pressing 'Emergency Battery Stop Button' will activate fire alarm system and trigger alert to FOC if is not already active.

a. IF able to do safely,

   THEN while evacuating, PRESS 'Battery Emergency Stop Button' located at south hydrant.

3. USE main access road around BESS to EXIT:

   a. ASSEMBLE at Assembly Point located at 115kV MPAC Building Emergency Cabinet, unless unsafe to do so based on wind direction and fire spread.

   b. MAINTAIN awareness of event, alarms, AND possible fire/smoke.

   c. AVOID passing near burning units.

      (1) Always MAINTAIN distance of at least one row of Megapacks between you and burning units, unless further distance is directed by the IC.

      (2) IF a burning unit is adjacent to roadway,

          THEN GO around back and FOLLOW road in opposite direction.

   d. AVOID passing through OR near smoke.

NOTE

FOC is primary point of contact with 911.

(1) IF unable to immediately reach FOC,

    THEN CALL 911 directly to report injuries.

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5.6 (continued)

4. STAY at the ASSEMBLY POINT until Fire Department arrives.

5. IDENTIFY PG&E Initial Response Incident Commander.

6. PG&E Initial Response Incident Commander DIRECT response activities and PERFORM the following:

   a. IDENTIFY incident (e.g., what is involved).

   b. CONTACT 911.

   c. PERFORM accountability of personnel in area and DIRECT to safe location.

   d. ISOLATE energy if possible [redacted].

   e. CONTROL site access and DO NOT ALLOW coworkers to reenter.

   f. CONTACT PG&E leadership (SEE Appendix C, Emergency Contact List).

   g. MEET first responder Authority Having Jurisdiction (AHJ) on site to provide status of incident, copy of EAP, and PROVIDE technical subject matter support until relieved.

   h. SET UP Incident Command Post.

      (1) DON the IC Vest.

      (2) OBTAIN copy of this EAP and Fire Pre-Plan.

      (3) OBTAIN Technical Reference Binder.

      (4) ASSIGN a Safety Officer

         - The Safety Officer may be the Initial Response IC.

   i. CALL Substation Supervisor and REPORT personnel available to respond.

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5.6.6 (continued)

j. COORDINATE qualified personnel to go to front gate and escort Fire Department to incident command.

k. ADVISE non-essential personnel (contractors, guests, other PG&E employees) to exit substation, if able.

7. MONITOR event through HMI AND camera displays.

5.7 Upon Fire Department Arrival:

NOTE

Responding Fire Agency Incident Commander will most likely be a Battalion Chief, or above.

1. IDENTIFY Responding Fire Agency Incident Commander.

2. Formally BRIEF and TRANSFER the Incident command to Fire IC:

a. INCLUDE the following information in briefing:

(1) Situation Status (e.g., Megapack(s) involved, etc.).

(2) Current organization (e.g., roles and assignments).

(3) Resource assignments (e.g., assets currently deployed).

(4) Resources enroute and/or ordered (e.g., fire agencies, County Environmental Health, PG&E PSS, Field Safety Specialists, PG&E Environmental, etc.).

(5) Facilities established (e.g., ICP, Staging Areas, etc.).

(6) Communications Plan (e.g., cell phone, radios, etc.).

(7) Situational update and concerns.

(8) Notifications made and/or needing to be made.

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5.7 (continued)

3. ADVISE and SUPPORT Fire Department Incident Commander in response activities.

   a. MONITOR HMI screens and CONFIRM de-energization complete.

      (1) ADVISE to push 'Battery Emergency Stop Button [redacted].

   b. IDENTIFY location of key elements of event, including:

      (1) Involved equipment (SEE HMI screens)

      (2) Any at-risk equipment due to rising temperatures (SEE HMI screens)

      (3) Firefighting equipment containers [redacted]

      (4) Hydrants [redacted]

      (5) Battery Stop Button [redacted]

      (6) Fire Alarm Panel [redacted]

4. MONITOR event through HMI AND camera displays.

NOTE

A fully involved Megapack will require 3+ hours to fully burn out.

5. WHEN fire has subsided, AND the fire department has transitioned command back to PG&E:

   THEN COORDINATE with Tesla on next steps, including the following remediation efforts:

   a. Thermal imaging to verify unit has cooled to ambient.

   b. Making unit safe by tagging out upstream Medium Voltage Transformer and associated Megapacks.

   c. Disconnecting MP both at transformer and inside customer cabinet using specifically developed procedures.

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5.7.5 (continued)

d. Sealing affected unit to include securing of doors with screws, wrapping in shrink wrap.

e. Removing unit from site for disposal at a Tesla approved recycling center.

NOTE

Waste streams may include, but not be limited to personal protective equipment, ash, water, metal, miscellaneous debris, universal waste, etc.

(1) [redacted].

6 Personal Injury or Illness

6.1 WHEN encountering injured personnel,

THEN:

1. REPORT injury to FOC.
2. CHECK and CLEAR area surrounding injured personnel for unsafe conditions.
3. Quickly ASSESS extent of injury and DETERMINE whether assistance is required.
4. IF moving injured person can be done without further injury,

   THEN MOVE injured to a safe place.
5. IF electrical shock occurred,

   THEN ENSURE circuit is de-energized before touching victim.
6. TREAT injured for shock until ambulance arrives.
7. MONITOR life signs of injured person.

6.2 Battery Storage Technician (OR designee), PERFORM the following:

1. CALL 911 for serious injuries.

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6.2 (continued)

2. SEND any available individual to meet ambulance at intersection of plant entrance road and Dolan Rd.

   a. ESCORT ambulance to accident scene.

3. CLEAR path from front gate to location of injured OR ill employee of equipment AND personnel.

4. Working with supervision, COORDINATE transporting employee to a designated hospital for minor injuries needing medical attention.

5. NOTIFY plant management AND supervision.

6.3 Unless victim has stopped breathing, responding employee OBTAIN permission from conscious victim before administering any of the following:

- Emergency first aid
- Cardiopulmonary resuscitation (CPR)
- Automated external defibrillating (AED)

7 Hazardous Material Spill

NOTE

Lithium-Ion batteries do not contain significant volumes of liquid for spillage.

Spill kits are located in Tesla equipment containers.

7.1 SEE Appendix D, Elkhorn BESS Pre-Fire Plan Reference Sheet, for details regarding any substances that exist.

7.2 For FR3 Dielectric Fluid spills, REFER TO Dielectric Fluid (PCB) Spill Response Procedures for Electric Distribution Line Equipment (Live Document in TID).

7.3 WHEN a spill is reported,

THEN:

1. Battery Storage Technician GATHER the following data and COORDINATE the following actions:

   - Size of spill
   - Location of spill

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7.3.1 (continued)

- Wind direction
- All hazardous substances
- Existing conditions
- Potential for offsite migration

2. ENSURE personnel do not attempt to isolate OR stop spill unless this can be done safely from outside of spill area.

3. DETERMINE whether spill is contained OR uncontained.

4. NOTIFY Environmental Field Specialist (EFS) OR Environmental Emergency Hotline at [redacted].

5. IF fire OR medical assistance is needed,

   THEN CALL 911.

6. EVACUATE all unnecessary personnel from:

   a. Area of spill.

   b. Site, as necessary.

NOTE

Spill kits are located at Tesla equipment containers.

7. COORDINATE containment of spill using appropriate spill kit (oil OR chemical).

8. IF any personnel exposed to chemical contamination,

   THEN immediately FLUSH with water for a minimum of 15 minutes.

   a. IF necessary,

      THEN TRANSPORT person to hospital for further OR more extensive care.

   b. PULL any Safety Data Sheets (SDS) from Incident Command Center and SEND copy to hospital with injured employee.

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7.3 (continued)

9. ADMINISTER first aid, as necessary.

10. NOTIFY plant management AND supervision.

7.4 SEE County of Monterey Emergency Response for Hazardous Materials in Supplemental References section.

1. USE physical boundary (e.g., caution or danger tape, barriers, stop signs) to deny entry into area.

2. ISOLATE issue and PERFORM the following:

   a. DETERMINE whether leak can be handled locally.

   b. ASSESS any injuries and ADMINISTER first aid.

   c. PROVIDE advice AND assistance for the following:

   - Rescue
   - Utilities
   - Location of hazardous materials
   - Other pertinent information for responders

NOTE

Power Generation is the only organization to determine "All Clear" situation.

7.5 Operations supervisor OR Substation supervisor PERFORM the following as soon as possible:

1. ISSUE release notification, referring to County of Monterey Emergency Response for Hazardous Materials in Supplemental References section.

   a. Clean Harbors Environmental Services 24-Hour Dispatch: (800-645-8265).

2. FOLLOW UP on status of injured personnel.

3. INITIATE any follow up repair measures.

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8 Earthquake

8.1 WHEN an earthquake occurs that potentially OR directly impacts OR degrades the facility,

THEN using radio, Battery Storage Technician ANNOUNCE the following message:

"An earthquake has occurred. If you are indoors, stay indoors. Lie to the side of a solid piece of furniture, such as a desk or table. Stay clear of windows, mirrors, bookshelves, and file cabinets. If you are outside, get out into the open, away from equipment, buildings, and power lines. Please await further instructions."

1. REPEAT message on handheld radio system.

8.2 Battery Storage Technician CALL 911 and FOLLOW all procedures for fire, AND hazardous substance spills.

8.3 All personnel:

1. ASSESS immediate area for injuries, fires, OR spills.
2. REPORT any injuries, fires, OR spills to Fresno Operating Center.
3. USE appropriate PPE when responding to any emergency.

8.4 Following any reported OR observed (even if only slightly felt at plant site) earthquake in the bay area region OR bordering counties, site personnel, CONDUCT thorough site inspections to determine:

1. Injured, missing, or trapped personnel.
2. Safety hazards caused by earthquake, such as:
   - Fires
   - Downed power lines
   - Damaged equipment

8.5 Battery Storage Technician immediately NOTIFY plant management AND supervision by phone with a plant status report.

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WARNING

Death, injury, or equipment damage may occur if equipment is restarted before the specific cause of the trip is known and addressed.

8.6 PROHIBIT restarting equipment that tripped offline during earthquake until specific cause of trip is known AND addressed.

8.7 Following thorough site inspections, PERFORM the following, as required:

1. EVACUATE site.
2. ADMINISTER first aid.
3. CALL emergency assistance.
4. INITIATE plant shutdown.
5. MODIFY plant operations.

9 Severe Weather

NOTE

Severe weather warnings are typically distributed by the local government emergency organization via radio and television stations.

9.1 Any personnel aware of a severe weather warning NOTIFY Fresno Operations Center.

9.2 Battery Storage Technician GATHER the following minimum data (if available) and COORDINATE the following actions:

1. NOTIFY all plant personnel either by cell phone OR in person of severe weather condition.
2. DETERMINE whether shelter-in-place OR evacuation of site personnel is necessary.
3. DETERMINE what other precautions will be taken to ensure safety of personnel AND reduce property loss.
4. ACCOUNT for all personnel AND visitors.

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9.2 (continued)

5. IF any persons missing OR injured,

   THEN CALL 911.

6. IF there are known injured, fire, OR spills,

   THEN FOLLOW this procedure.

9.3 During severe weather occurrence, all onsite personnel immediately ASSESS safety of their work location.

1. CONSIDER the following:

   a. High winds have potential to dislodge AND lift heavy objects such as cable tray covers.

   b. Outside floor areas, ladders, and walkways can be slippery from ice during freezing temperatures.

2. PROHIBIT crossing flooded areas inundated with flowing water.

3. IF lightning is present,

   THEN REMAIN clear of power lines, metal fences, AND other conductive structures.

9.4 PERFORM the following, as necessary:

1. EVACUATE site.

2. ADMINISTER first aid.

3. CALL in emergency assistance.

4. INITIATE plant shutdown.

5. MODIFY plant operations.

9.5 Battery Storage Technician:

1. NOTIFY plant management AND supervision.

2. LOG incident in corporate Event Notification System.

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10 Security Threat

10.1 WHEN a security threat is received at facility,

THEN person receiving threat, PERFORM the following:

1. PROHIBIT attempting to locate OR handle any suspicious device.
    a. SEE Identifying Suspicious Packages (Supplemental Reference).
2. REMAIN calm.
3. ENSURE caller remains on line as long as possible to obtain as much information as possible.
4. USE Security Threat Checklist (Supplemental Reference), as a questioning guide to document conversation.

10.2 On shift Battery Storage Technician PERFORM or COORDINATE a response to threat as follows:

1. DETERMINE course of action in conjunction with local authorities.
2. NOTIFY plant management AND supervision.
3. BEGIN site evacuation if possible.
    a. NOTE anyone listed as onsite who does NOT report to safe zone.
    b. INFORM authorities of anyone missing AND their last known location.
4. OPEN gate for emergency vehicle entry.
5. OPERATE plant as directed by responding agency OR plant manager OR supervisor.
6. RETURN plant operations to normal after direction of management OR supervision.
7. ALLOW evacuated personnel to return to site.

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11 Physical Threat (Active Shooter or Intruder)

11.1 In event of an Active Shooter:

1. REFER TO Active Shooter Quick Reference Guide (Supplemental Reference) for guidance on performing one of the following

   a. GET OUT: Escape if possible.

   b. HIDE OUT: In an area that is safe AND NOT easily accessible (i.e., behind locked OR blocked doors).

   c. TAKE OUT: Fight OR incapacitate shooter as a last resort.

11.2 In the event of an Intruder:

1. PROHIBIT confronting intruder.

2. SEEK shelter in a secured area.

11.3 USE cell phones to COMMUNICATE threat to others.

11.4 Battery Storage Technician CALL 911 to report any physical threat.

1. IF possible,

   THEN PROVIDE the following details:

   - Location of Active Shooter / Intruder
   - Number of Active Shooter(s) / Intruder(s)
   - Physical descriptions
   - Numbers AND Types of Weapons
   - Number of potential victims

11.5 WHEN safe to do so,

THEN:

1. NOTIFY Corporate Security Department (CSD): [redacted].

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11.5 (continued)

2. PROVIDE the following details:
   - Date AND time
   - Contact name, location, AND phone number
   - Situation location AND description
   - Whether law enforcement was contacted OR is needed
3. Battery Storage Technician NOTIFY Operations Supervisor OR Substation supervision (Appendix C, Emergency Contact List).

NOTE

FOC will call Energy Policy and Procurement Real Time Operations Merchant (EPP).

4. CALL FOC and REPORT any emergency threatens reliability OR status of generating units.

12 Planned Evacuation Due to External Hazards (Fire, Flood, etc.)

NOTE

Every emergency is unique. Battery Storage Technician has the responsibility and authority to determine whether an evacuation is necessary.

WARNING

This plan is to be used when there is an adequate amount of time to isolate plant equipment prior to evacuating the facility.

12.1 Battery Storage Technician CALL 911 to report any active on-site emergencies.

12.2 WHEN a planned evacuation is required,

THEN Incident Commander:

1. CALL for all personnel over two-way radio to gather in control room for further instructions.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

12.2 (continued)

2. TAKE ATTENDANCE of all personnel to ensure everyone is accounted for.

3. ASSIGN responsibilities to:

   a. Incident Commander

   b. Essential Personnel

4. DETERMINE safe evacuation assembly area (assembly area is determined by the nature of the emergency).

12.3 Emergency Evacuation Coordinator:

1. DETERMINE a safe route to evacuation assembly area.

2. DIRECT all non-essential personnel to REPORT to evacuation assembly area.

3. REPORT to evacuation assembly area.

4. TAKE ATTENDANCE of non-essential personnel.

5. WHEN all non-essential personnel are accounted for,

   THEN NOTIFY plant management OR supervision (Appendix C, Emergency Contact List).

6. IF any non-essential personnel NOT accounted for,

   THEN NOTIFY plant management OR supervision (Appendix C, Emergency Contact List).

12.4 Battery Storage Technician:

NOTE
Fresno Operating Center (FOC) will coordinate with the Energy Policy and Procurement Real-Time Operations Merchant (EPP).

1. CALL FOC:

   a. NOTIFY plant is being shut down AND evacuated.

   b. PROVIDE Incident commander Cell Phone number.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

12.4 (continued)

2. CALL Corporate Security Department: [redacted]:

   a. NOTIFY plant is being evacuated and REQUEST Corporate Security Department monitor security of facility remotely.

   b. PROVIDE Evacuation Coordinator Cell Phone number.

3. DIRECT all Essential Personnel to immediately evacuate plant.

12.5 Emergency Evacuation Coordinator:

1. TAKE ATTENDANCE of Essential Personnel.

2. WHEN all non-essential personnel are accounted for,

   THEN NOTIFY plant management OR supervision (Appendix C, Emergency Contact List).

3. IF any non-essential personnel NOT accounted for,

   THEN NOTIFY plant management OR supervision (Appendix C, Emergency Contact List).

13 Tsunami Alert

NOTE

The Moss Landing substation and BESS facility are within the ‘Safe Zone’ according to the California Department of Conservation’s hazard maps (as of March 2021 release). However, Dolan Rd has portions within the inundation zone.

13.1 IF Tsunami alert received,

THEN:

1. STOP work.

2. NOTIFY FOC AND Supervisor.

3. EVACUATE Substation but REMAIN in ‘Safe Zone.’

4. EVALUATE hazards and EVACUATE east via Dolan Rd, as necessary.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

14 Station Power Loss

NOTE
Emergency DC lighting is present inside each switchgear building; however, no emergency lighting is available in the battery field.

14.1 IF present on site when lighting is interrupted,

THEN:

1. STOP work.
2. EVALUATE hazards.
3. CALL FOC and NOTIFY station lights NOT functional.
4. DEPLOY temporary lighting as needed to continue necessary work.

15 Training

15.1 REQUIRE all Elkhorn employees to read AND understand this EAP.

15.2 ADMINISTER training at the following times:

1. When employee is first hired.
2. Whenever employee’s responsibilities OR designated actions under plan change.
3. Whenever plan is changed.

15.3 At least annually, ENSURE plant personnel perform an Emergency Action Plan drill.

1. INDOCTRINATE all visitors AND contractors to Elkhorn BESS Emergency Response procedures AND potential hazards they may be exposed to.

15.4 Training Records

1. Plant Manager OR designee, MAINTAIN training records that consist of training courses attended, trainer, AND dates completed.
2. MAINTAIN training records for duration of employee employment plus one year.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

15.5 In addition to the above listed EAP training, all PG&E emergency responders must COMPLETE the following training PER EMER-3001M, Company Emergency Response Plan (CERP), V 8.1, Section 5.8.1**:

a. G-606 California Standardized Emergency Management System (SEMS) Introductory Course (discretionary / recommended for IC)

b. IS-100 Introduction to the Incident Command System, ICS 100

c. IS-200 ICS for Single Resources and Initial Action Incidents, ICS 200

d. IS-700 An Introduction to the National Incident Management System

e. IS-800 National Response Framework – An Introduction

f. ICS-300 (found in My Learning as EPRS-0300 Intermediate Incident Command System for Expanding Incidents) is Mandatory for IC and recommended for all Incident Management Teams.

15.6 In addition to the above CERP training requirements, ENSURE PG&E employee First Responders are trained to the level which they may be assigned, according to Roles and Responsibilities (e.g., First Responder Awareness / Operations, and On-Scene Incident Commander).

NOTE

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release.

1. First responder awareness level.

a. ENSURE first responders at awareness level have sufficient training OR have had sufficient experience to objectively demonstrate competency in the following areas:

(1) An understanding of what hazardous substances are, and the risks associated with them in an incident.

(2) An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.

(3) The ability to recognize the presence of hazardous substances in an emergency.

(4) The ability to identify the hazardous substances, if possible.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

15.6.1.a (continued)

(5) An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.

(6) The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.

NOTE

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.

2. First responder operations level.

a. In addition to training listed for the awareness level (employer certified), ENSURE first responders at the operational level have received at least eight hours of training OR have had sufficient experience to objectively demonstrate competency in the following areas:

(1) Knowledge of the basic hazard and risk assessment techniques.

(2) Know how to select and use proper personal protective equipment provided to the first responder operational level.

(3) An understanding of basic hazardous materials terms.

(4) Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.

(5) Know how to implement basic decontamination procedures.

(6) An understanding of the relevant standard operating procedures and termination procedures.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

15.6 (continued)

NOTE

Incident commanders assume control of the incident scene beyond the first responder awareness level.

3. On scene incident commander.

   a. ENSURE incident commanders receive at least 24 hours of training equal to the first responder operations level AND have competency in the following areas (employer certified):

      (1) Know and be able to implement the employer's incident command system.

      (2) Know how to implement the employer's emergency response plan.

      (3) Know and understand the hazards and risks associated with employees working in chemical protective clothing.

      (4) Know how to implement the local emergency response plan.

      (5) Know of the state emergency response plan and of the Federal Regional Response Team.

      (6) Know and understand the importance of decontamination procedures.

4. ENSURE training in accordance with requirements of Title 8 California Code of Regulations (CCR), Section 5192 Hazardous Waste Operations and Emergency Response, Section (q), Emergency Response to Hazardous Substance Releases.**

5. PROVIDE annual refresher training of sufficient content AND duration to maintain competencies or REQUIRE employees demonstrate competency in those areas at least yearly.

6. DEVELOP statement of training competency.

   a. IF statement of competency is made,

      THEN RETAIN record of methodology used to demonstrate competency.

End of Instructions

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

PERFORMED BY

Name	LANId	Initials
Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.	Click here to enter text.

DEFINITIONS

Battery Emergency Stop Button: [redacted].
This button de-energizes the batteries by opening the [redacted] in the switchgear. The Switchgear and upstream power transformers remain energized.

Battery Information Display: [redacted].

IMPLEMENTATION RESPONSIBILITIES

Plant Manager is responsible for approving, issuing, revising, and implementing this procedure.

Operations Supervisor is responsible for communicating this procedure to the target audience.

GOVERNING DOCUMENT

NA

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

This plan meets the provisions of Title 8 CCR Section 3220, Emergency Action Plan.

Records and Information Management:
PG&E Data, Information, and Records are company assets that must be traceable, verifiable, accurate, and complete and can be retrieved upon request. Functional Areas are responsible for complying with the Information & Records Governance Policy, Standards, and the Information and Records Retention Schedule. Refer to GOV-7101S, “Enterprise Records and Information Management Standard” for further guidance or contact Information & Records Governance at Information&RecordsGovernance@pge.com.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

REFERENCE DOCUMENTS

Developmental References:

- NA

Supplemental References:

- Pre-Fire Plan-Elkhorn BESS; Elkhorn Evacuation Plan (Refer to Page 3)
- PG-1103S, “Procedure and Work Plan Use and Adherence Requirements”
- PG-1103P-01, “Procedure and Work Plan Use and Adherence”
- Active Shooter Quick Reference Guide, https://pge.sharepoint.com/sites/security/FiveMinuteMeetings/Active-Shooter-Quick-Reference.pdf
- Cal OES, California Hazardous Materials Spill / Release Notification Guidance, dated February 2014.
- EMER-3001M, Company Emergency Response Plan (CERP), V 8.1, Effective 01/02/2023
- FIRESCOPE – Field Operations Guide ICS 420-1, Incident Command Publication, 2022 Edition
- Identifying Suspicious Packages, https://pge.sharepoint.com/sites/security/FiveMinuteMeetings/Identifying-Suspicious-Package.pdf
- Reporting a Security Concern: Reporting A Security Concern (sharepoint.com)
- Reporting a Bomb Threat: PG&E BOMB THREAT REPORT FORM (jotform.com)
- Title 8 California Code of Regulations (CCR), Section 5192, Hazardous Waste Operations and Emergency Response (HAZWOPER), State OSHA**
- 29 CFR, 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER), Federal OSHA**
- Utility Procedure: ENV-5101P-01, “Agency Notification Procedure for Release of Hazardous Substances”
- Utility Procedure: ENV-10011P-01, “Environmental Management Emergency Operations Procedure”

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

APPENDICES

Appendix A, Roles and Responsibilities

Appendix B, Incident Command (Assembly Point) and Other Equipment

Appendix C, Emergency Contact List

Appendix D, Elkhorn BESS Pre-Fire Plan Reference Sheet

ATTACHMENTS

NA

DOCUMENT RECISION

This document supersedes PG-7002P-01, “Elkhorn Batter Energy Storage System (BESS) – Emergency Action Plan (EAP),” Rev. 1, dated 02/28/2024.

DOCUMENT APPROVER

[redacted], Director O&M, Fossil & Renewable

[redacted], Senior Plant Manager – Elkhorn battery storage

DOCUMENT OWNER

[redacted], Senior Plant Manager – Elkhorn battery storage

[redacted], Renewables Supervisor – Elkhorn battery storage

DOCUMENT CONTACT

[redacted], Renewables Supervisor – Elkhorn battery storage

[redacted], Safety Program Manager, Principal

[redacted], Senior Manager, Environmental Management

[redacted], Manager, PGEN Safety

Current Power Generation Guidance Documents Approver, Owner, and Contact List

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

REVISION NOTES

Where?	What Changed?
This Revision, Rev 2, (07/30/2024)	
Throughout	SMEs from EP&R, PSS Field Team, Elkhorn BESS leadership, and the PGEN Fire Controls Program Manager reviewed and updated guidance related to a megapack fire incident.
Section 3	3.3.1 Updated NOTE for External Emergency Response to remove PG&E employees from performing IC under a Unified Command. 3.3.2.5 Updated title for Emergency Management Specialist (EMS) to serve as IC Advisor. 3.3.2.7.b Added seven bullet points to clarify role of PG&E initial IC.
Section 5	Clarified response guidance specific to Initial Response PG&E IC and transfer of command to the Fire IC Authority Having Jurisdiction (AHJ).
Section 7	7.3.1 deleted reference to Att01, Hazardous Materials Tactical Worksheet / Incident Action Plan (IAP).
Section 15	15.5.f Clarified ICS-300 and EPRS-0300 courses, based on guidance from EP&R SMEs.
ATTACHMENTS	Deleted Att01, Hazardous Materials Tactical Worksheet / Incident Action Plan (IAP).
Appendix A	Clarified Roles and Responsibilities for A. PG&E First Responders, B. North County Fire Protection District (NCFPD), and C. PG&E Initial Response Incident Commander.
Appendix B	A.7 Deleted Unified Command guidance related to PG&E IC role.
Revision 1, (02/28/2024)	
Throughout	Document owners completed review, no technical content or revision number change.
Revision 1, (05/18/2023)	
Throughout	Converted to new Guidance Document Management (GDM) template, including minor editorial updates. Updated to address Quality Assurance Audit Findings (QAAF), CAP 123603869, on Continuous Use procedures. Regulatory Training requirements marked with double asterisks (**).
Header (all pages)	Editorial to correct spelling of Batter(y)
Section 3	3.1 Added guidance for managing waste; Added guidance for notifying environmental. 3.2 Added criteria requiring notification to the EFS or Environmental Emergency Hotline. 3.3. Added clarification on establishing initial and unified command; Added guidance for Operator to notify Environmental and HAWC.
Section 4	4.1 Added guidance for contacting EFS. 4.2 Added info regarding alternate location for the IC.
Section 5	5.1 Added guidance for fires involving Tesla Megapack. 5.7 Added guidance to formally assume PG&E IC under unified command and provide a transfer of command briefing; Added guidance for Tesla waste generation.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Where?	What Changed?
Section 7	7.3 Added guidance to notify EFS.
Section 15	Added First Responder level descriptions, training and competency requirements and EMER-3100M Company Emergency Response Plan (CERP) Incident Command Training
End of Procedure	Added Signature Block Table
References	Updated Supplemental References
Document Ownership	Updated to current names and titles
Appendices	Updated each appendix for improved content flow, clarity and accuracy.
Attachments	Created new Attachment 1 - Hazardous Materials Tactical Worksheet / Incident Action Plan (IAP), applying SINCIAPCPDDDD methodology.
Editorial Update Only, no changes to the Publication Date or Revision Number (05/10/2023)	
Throughout	Updated to address Quality Assurance Audit Findings (QAAF), CAP 123603869, on Continuous Use procedures.
Revision 0, (10/28/2021)	
NA	This is a new procedure.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix A, Roles and Responsibilities
Page 1 of 6

A. PG&E First Responders are responsible for:

1. Addressing alarms and equipment (are primarily Renewables Qualified Electrical Workers (QEWs)).

2. Assuming the role of PG&E Initial Response Incident Commander (IC) and performing the following:

   a IDENTIFY incident (e.g., what is involved).

   b CONTACT 911.

   c PERFORM accountability of personnel in area and Direct to safe location.

   d ISOLATE energy if possible (e.g., close breaker, open valve, activate "EMERGENCY STOP BUTTON" — battery isolation from utility grid at 21kV).

   e CONTROL site access and DO NOT ALLOW coworkers to reenter.

   f CONTACT PG&E leadership (SEE Appendix C, Emergency Contact List).

   g MEET first responder Authority Having Jurisdiction (AHJ) on site to provide status of incident, copy of EAP, and provide technical subject matter support until relieved.

3. Additional duties include:

   a DON the PG&E Incident Command Vest (located in main entrance Pre-Fire Plan box).

   b ASSIGN a Safety Officer (required per Title 8, Section 5192).

   c The Safety Officer may be the Initial Response IC.

   d IMPLEMENT the PG-7002P-01 Elkhorn Battery Energy Storage (BESS) – Emergency Action Plan (EAP).

   e COMMUNICATE with the FOC.

   f INITIATE Activity Log (ICS Form 214), or equivalent documentation.

   g TRANSITION from the Initial Response IC role to a Technical Advisor to the AHJ.

B. North County Fire Protection District (NCFPD) is the Authority Having Jurisdiction (AHJ) over Moss Landing area and designated as the primary responding agency to the Elkhorn BESS. If NCFPD is otherwise committed, this role may be filled by another responding fire agency.

1. NCFPD will typically serve as the Fire IC, responsible for the overall incident management, supported by PG&E SMEs and others (e.g., law enforcement, County Environmental Health, etc.), under a Unified Command.

C. PG&E Initial Response Incident Commander

NOTE
In the absence of a supervisor, the most qualified Operator or Renewables Tech will act as Initial Response Incident Commander until the arrival of the AHJ.

1. This role should remain with the first arriving onsite Renewables Technician and should only be handed off to the Renewables Supervisor, or the AHJ upon their arrival.

2. First QEW can reassign the role to another QEW, as needed.

3. Operator & Substation Maintenance Supervisor should be notified of any change in the Initial Response Incident Commander.

4. PG&E Initial Response Incident Commander is responsible for:

   a Assuming the role of “initial” PG&E Incident Response Commander (IC) and performing the following:

      (1) IDENTIFY incident (e.g., what is involved).

      (2) CONTACT 911.

      (3) PERFORM accountability of personnel in area and DIRECT to safe location.

      (4) ISOLATE energy if possible (e.g., close valve, open breaker, activate "EMERGENCY TOP BUTTON" — battery isolation from utility grid at 21kV).

      (5) CONTROL site access and DO NOT ALLOW coworkers to reenter.

      (6) CONTACT PG&E leadership (SEE Appendix C, Emergency Contact List).

Appendix A, Roles and Responsibilities
Page 3 of 6

(7) MEET first responder Authority Having Jurisdiction (AHJ) on site to provide status of incident, copy of EAP, and provide technical subject matter support until relieved.

b Additional duties include:

(1) DON the PG&E Incident Command Vest (located in main entrance Pre-Fire Plan box).

(2) ASSIGN a Safety Officer (required per Title 8, Section 5192).

- The Safety Officer may be the Initial Response IC.

(3) IMPLEMENT the PG-7002P-01 Elkhorn Battery Energy Storage (BESS) – Emergency Action Plan (EAP).

(4) COMMUNICATE with the FOC.

(5) INITIATE Activity Log (ICS Form 214), or equivalent documentation.

(6) TRANSITION from the Initial IC role to a Technical Advisor to the AHJ.

(7) PROVIDE Technical Support to the AHJ IC by providing guidance on electrical hazards and sharing deenergizing activities.

(8) COMMUNICATE externally and COORDINATE PG&E resources on site. This task will eventually reside with the Substation Maintenance Supervisor when they arrive on site.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

D. Fresno Operations Center (FOC) is responsible for:

NOTE
The Operator for Elkhorn is the Fresno Operations Center. See FOC /DO Alarm Handling Procedures.

1. Operating and monitoring BESS facility.
2. Supporting the PG&E Incident Commander as needed during an emergency event.
3. Contacting 911, if emergency response is required.
4. Contacting PG&E First Responders.
5. Contacting Renewables Supervisor.
6. Contacting the Environmental Field Specialist (EFS) or the Environmental Emergency Hotline.
7. Contacting the HAWC to request PSS or IC Technical Advisor response.
8. Logging event in Outage and Dispatch Management System (ODMS).
9. Contacting Energy Procurement Real-Time (RT) Desk.

E. Substation Maintenance Supervisor is responsible for:

1. Dispatching Substation Resources including electricians.
2. Informing region Superintendent of event and heading to project site.

F. RT Desk is responsible for:

1. Logging outage in OMS
2. Informing CASIO Control Center directly (see CASIO tariff 9.3.10.3.1).

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix A, Roles and Responsibilities
Page 5 of 6

G. BESS Operations & Performance Manager is responsible for:

1. During an event, BESS Operations & Performance Manager will only need to be notified of the event.

2. Post emergency, this role will work to coordinate with the various teams to manage the site, complete root cause analysis, and disposition of materials.

H. Grid Control Center (GCC) / Distribution Control Center (DCC) is responsible for:

1. In cases where sites have equipment managed by another Control Center, that Control Center will be informed of the situation.

2. In some cases, such as with the Elkhorn BESS, this notice is necessary due to the presence of personnel in the substation.

I. Environmental Management is responsible for:

1. Environmental support during an emergency event.

2. Performing Agency Notifications, including:

   a The Local Certified Program Agency (CUPA), Monterey County Health Department: Phone (831) 755-4511.

   b The California Governor's Office of Emergency Services, California State Warning Center: Phone (800) 852-7550 or (916) 845-8911.

      (1) Advise this Notification is for a potential hazardous materials release, both on the ground and airborne.

3. Coordinating / performing environmental media sampling, including pond water sampling post fire event and soil sampling, if necessary to ensure site does not require soil excavation post fire event.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix A, Roles and Responsibilities
Page 6 of 6

NOTE
Emergency Preparedness and Response (EP&R) is available 24/7 via the Hazardous Awareness Warning Center (HAWC) to support a response.

J. Emergency Preparedness and Response (EP&R) is responsible for:

1. Providing Public Safety Specialists (PSS) to the incident to serve as Agency Representative.

2. Providing IC Advisors to serve as ICS Technical Specialists advising the IC.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix B, Incident Command (Assembly Point) and Other Equipment

A. Incident Command

1. The initial Incident Command Post (ICP) location for BESS events is next to the 115kV MPAC building lay-down yard inside the Moss Landing Substation.

2. This location also serves as the Assembly Point for any personnel who were inside the BESS at the start of the event.

3. The ICP may be relocated during an event, at the discretion of the IC, to support operations and ensure the safety of all responders.

   Note: The IC Building may be better served as a Technical Reference location vs. ICP, as determined by the Incident Commander.

   a It may be necessary to relocate to another location due to plume migration making the ICP building uninhabitable.

   b Or, operationally, the number of individuals managing the event may exceed the capacity of thee small ICP building.

4. The ICP, Staging Area, and other designated support facilities (e.g., Joint Information Center, etc.) may be relocated outside the substation (e.g., Main Gate entrance) to manage the event, based on event specific factors.

5. When the fire alarm is activated, all personnel including contractors/guests present at Moss Landing Substation must remain at the Assembly Point to be accounted for, until PG&E Incident Commander releases them to evacuate the substation.

6. After being released by the Incident Commander, all personnel should evacuate the substation and report their status to their corresponding supervisors.

7. The Unified Incident Command site is equipped with an Emergency Cabinet which contains equipment to aid in the response of an event, including:

   - Battery Information Display
   - Copy of the Pre-Fire Plan (PFP), EAP, SDS’s
   - First Aid Kits

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix B, Incident Command (Assembly Point) and Other Equipment

B. Emergency Equipment Containers

1. Fire Fighting Equipment

   a The BESS area includes two staged unmanned nozzle monitor carts for the Fire Department to apply water without having personnel remain in proximity to the fire.

   b The monitor carts are staged [redacted].

   c Each container stores [redacted].

2. Spill Kits

   a Two Spill Kits are available, one in each Emergency Equipment Container.

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix C, Emergency Contact List
Page 1 of 2

Agency	Phone Number
Emergency (police, fire, and ambulance)	911
CHEMTREC (Chemical emergency information)	1-800-262-8200
Fire Department - North County Fire Protection District	831-424-1851
Hospital –Watsonville Community Hospital	831-724-4741
Police - Watsonville Police Department	831-768-3300
Poison Control Center (Medical Emergency)	1-800-222-1222
Emergency Spill Response and Cleanup (Biohazard, Oil or Chemical Spill)	
24 Hour Hazmat Notification - California Office of Emergency Services (OES) State Warning Center	1-800-852-7550 or (916) 845-8911
California Department of Toxic Substance Control (DTSC) (Hazardous waste tank system or secondary containment releases)	1-800-698-6942
Central Valley Regional Water Quality Control Board / Sacramento Office	1-916-464-3291
Safetec (SDS) – HSI Platform	24-Hour Phone: 1-800-704-9215 or HSI Platform (osmanager4.com)
Salinas Urgent Care	831-755-7880
State Water Board / Stormwater Desk	1-866-565-3107
Elkhorn Facility Emergency Contacts	
Clean Harbors Environmental Services	[redacted]
Corporate Security Department (CSD)	[redacted]
Elkhorn Operations Supervisor	[redacted]
Elkhorn Substation Supervisor	[redacted]
Environmental Field Specialist (EFS) OR Environmental Emergency Hotline	[redacted]
EP Real Time	[redacted]
Fossil & Renewables O & M Director	[redacted]
Fresno Operating Center (FOC)	[redacted]

Elkhorn Battery Energy Storage System (BESS) – Emergency Action Plan (EAP)

Appendix C, Emergency Contact List
Page 2 of 2

Elkhorn Facility Emergency Contacts (continued)	
PG&E Hazardous Awareness Warning Center (HAWC) - Public Safety Specialist (PSS) Support - Incident Command Technical Advisor Support	[redacted]
Senior Manager, Fossil & Renewables	[redacted]
Tesla 24/7 Hotline	[redacted]

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Appendix D, Elkhorn BESS Pre-Fire Plan Reference Sheet

Page 1 of 1

Warnings/Cautions

WARNING: CONSIDER all equipment ENERGIZED until CONFIRMED – DE-ENERGIZED and GROUNDED by QUALIFIED PG&E personnel. Adjacent electrical equipment not involved in a fire may still be energized during an event.

WARNING: Batteries cannot be entirely de-energized and may contain charge after site is de-energized or equipment is damaged.

Firefighter Personal Protective Equipment (PPE): If fire/smoke/gas or unknown conditions are present, firefighters should wear Self-Contained Breathing Apparatus (SCBA) and fire protective turnout gear.

WARNING: Do not come into contact with venting gas or smoke without appropriate PPE. Venting electrolyte can be extremely hot (>600°C).

WARNING: Do not open any doors, cut into, or touch the damaged unit unless PG&E personnel advise that it is safe to do so.

CAUTION: A battery fire may continue for several hours and may result in multiple re-ignition events. It may take 24 hours or longer for the battery pack to cool. Water on burning unit will only delay full burn and not suppress it.

Hazard Identification

Megapack: Mechanical Damage – See section 6.1, page 7

Megapack: Fire – See sections 6.2 & 6.7, pages 7 & 8

Lithium-Ion batteries are housed inside [redacted].

Megapack: Venting Electrolyte – See section 6.7, page 8

Appears as white smoke [redacted]. Vented gases may irritate the eyes, skin, and throat. Cell vent gases are typically hot; upon exit from a cell, vent gas temperatures can exceed 600°C (1,110°F). Contact with hot gases can cause thermal burns. Vented electrolyte is flammable and may ignite on contact with a competent ignition source such as an open flame, spark, or a sufficiently heated surface.

Megapack: Leaking Electrolyte – See section 6.6, page 8

Leaked electrolyte is colorless and characterized by a sweet odor. Leaked electrolyte solution is flammable and corrosive / irritating to the eyes and skin. If an odor is obvious, evacuate or clear the surrounding area.

Any released electrolyte liquid is likely to evaporate rapidly, leaving a white salt residue.

If a liquid is observed that is suspected to be electrolyte, ventilate the area and avoid contact with the liquid until a positive identification can be made.

Evaporated electrolyte gas is flammable and will contain alkyl-carbonate compounds.

Megapack: Leaking Coolant – See section 6.4, page 8

Fluid is blue in color and does not emit a strong odor. No immediate contact hazard. See Safety Data Sheet (SDS) for additional guidance.

Transformer: Mechanical Damage – See section 5.4, page 7

Transformer: Fire – See section 5.2 or 5.3, page 7

Fire Fighting Guidance

Megapack Fire

Contact Tesla Energy Technical Support: North America Hotline (24/7) 1-650-681-6060.

Employ a defensive firefighting strategy only. No water on burning Megapack. Allow the affected unit to consume itself as designed. Applying water to the burning unit will only slow its eventual combustion.

Firefighters should wear SCBA and structural firefighting turnouts when in close proximity to burning Megapack(s) or within plume travel path.

At the discretion of the Incident Commander (IC), apply water to neighboring exposures:

Primary focus for water application: Radiant heat or fire impacting nearby transformers, buildings, and/or foliage.

Note: For adjacent Megapacks, water may not provide significant cooling or protective benefit. (See Sec 6.2 for additional guidance)

Use a wide-fog stream, at lowest volume possible, to achieve desired cooling.

Transformer Fire

No water unless Incident Commander (IC) deems desired.

Switchgear Enclosure Fire

No water **inside** enclosures at any time. Exterior cooling should use fog pattern only, if advised by IC.

Sealed Lead Acid battery room in Switchgear Building 1

Switchgear enclosures have [redacted] fire suppression in all rooms.

Do not open any doors to enclosures without full PPE and SCBA gear.

Access

[redacted]

Equipment on Site

[redacted]

Pond 4 - 90k gallons, [redacted]

Pond 3 – 84k gallons, [redacted].