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HANWHA ENERGY USA HOLDINGS CORPORATION
d/b/a 174 Power Global (formerly 174 Power Global Corporation)
300 SPECTRUM CENTER DRIVE, SUITE 1020,
IRVINE, CALIFORNIA 92618
T+1 949 748 5970



AFFIDAVIT

This Affidavit is being submitted in satisfaction of the Compliance Filing pursuant to P.U.C. Substantive Rule 25.53 with respect to Oberon Solar IA, LLC.


1. I, Henry Yun, the undersigned, as representative of Hanwha Energy USA Holdings Corporation d/b/a 174 Power Global, am authorized to execute this affidavit on behalf of Hanwha Energy USA Holdings Corporation d/b/a 174 Power Global.
2. Hanwha Energy USA Holdings Corporation d/b/a 174 Power Global is a manager of 174 Power Global O&M, LLC.
3. 174 Power Global O&M, LLC is an operator ("Operator") for Oberon Solar IA, LLC, a power generation company ("PGC").
4. I confirm that all of Operator's relevant operating personnel of the PGC are familiar with the contents of the emergency operations plan for the PGC (the "Plan"), a summary of which is attached hereto as Annex A; and such personnel are committed to following the Plan except to the extent deviations are appropriate under the circumstances during the course of an emergency.

174 Power Global O&M, LLC

By: Hanwha Energy USA Holdings Corporation

d/b/a 174 Power Global

Its: Manager

By: 
Name: **Henry Yun**

Title: President



Annex A

Summary of the Plan for Oberon Solar IA, LLC

[see attached]

Comprehensive Summary of Oberon Emergency Operations Plan

Oberon Solar IA, LLC (Oberon) is a solar generation facility that will commence operations in June 2020. Oberon is an indirect subsidiary of Hanwha Energy USA Holdings Corporation, d/b/a 174 Power Global (174 Power Global) and is filing its Emergency Operations in accordance with Rule 25.53(c)(2)(A).

174 Power Global has a comprehensive emergency operations plan which documents processes, checklists, procedures, and strategies that Oberon uses to prepare and respond to system-wide or local events or emergencies that may impact the facility, personnel, or critical business processes. Oberon utilizes a suite of documentation to address the required topics, including the Oberon: Emergency Operations Plan; Pandemic Preparedness Plan; Summer Weatherization Plan, and Winter Weatherization Plan.

Summary of Emergency Operations Plan Content

The Oberon Emergency Operations Plan is the over-arching document that sets the policies for severe weather planning, identification of critical failure points (personnel and equipment), restoration response timelines, and drills. This Plan also contains the general emergency site procedures (e.g. evacuation, personnel injuries and treatment, fire and hazardous material response, and suspected threats or sabotage).

Summary of Pandemic Preparedness Plan Content

The Oberon Pandemic Preparedness Plan serves as the plan for maintaining essential functions and services during a pandemic. This plan addresses the specialized continuity planning required for a pandemic by addressing considerations, challenges, and elements specific to the dynamic nature of a pandemic. The Plan defines a pandemic crisis team that is responsible for evaluation and assessment, as well as the development of response actions and communications.

Summer and Winter Weatherization Plan Content

Oberon maintains separate plans for summer and winter weatherization (hereafter, “weatherization plan” or “plans”). Each plan covers the same topics for the two (2) distinct seasons.

The weatherization plans document the programs in place to maintain the facility’s reliability and to prevent extreme heat/cold or severe summer/winter weather-related events from having adverse impacts to reliability or operations. The plans document the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. The plans include numerous checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

Included below is a mapping of the required content to the document(s) that address each topic.

(2) An electric utility that operates an electric generation facility or a PGC shall include in its emergency operations plan for its generation facilities, but is not limited to, the following:

☒ (A) A plan that addresses severely cold weather and severely hot weather.

Addressed via:

- Emergency Operations Plan
- Winter Weatherization Plan
- Summer Weatherization Plan

☒ (B) A plan that addresses any known critical failure points, including any effects of weather design limits.

Addressed via:

- Winter Weatherization Plan: Section 5.0; Appendix 3
- Summer Weatherization Plan: Section 5.0; Appendix 3

☒ (C) A plan that addresses an emergency shortage of water.

Addressed via:

- Winter Weatherization Plan: Appendix 4; Appendix 9 (drinking water)
- Summer Weatherization Plan: Appendix 4; Appendix 9 (drinking water)

☒ (D) A plan for identification of potentially severe weather events, including but not limited to tornadoes, hurricanes, severely cold weather, severely hot weather, and flooding.

Addressed via:

- Emergency Operations Plan: Section 8
- Winter Weatherization Plan
- Summer Weatherization Plan

☒ (E) A plan for the inventory of pre-arranged supplies for emergencies.

Addressed via:

- Winter Weatherization Plan: Section 6.3; Appendix 4, Appendix 5, Appendix 7
- Summer Weatherization Plan: Section 6.3; Appendix 4, Appendix 5, Appendix 7

☒ (F) A plan that addresses staffing during severe weather events.

Addressed via:

- Winter Weatherization Plan: Section 8; Appendix 5; Appendix 8; Appendix 9
- Summer Weatherization Plan: Section 8; Appendix 5; Appendix 8; Appendix 9
- Emergency Operations Plan: Section 7

☒ (G) Checklists for generating facility personnel to address emergency events.

Addressed via:

- Winter Weatherization Plan: Appendices
- Summer Weatherization Plan: Appendices
- Emergency Operations Plan: Appendices
- Pandemic Plan: Appendix 2

☒ (H) A summary of alternative fuel and storage capacity.

Addressed via:

- Emergency Operations Plan: Section 9 (b/u generator)

☒ (I) A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels.

- N/A – no alternative fuel for site

☒ (J) Priorities for recovery of generation capacity.

Addressed via:

- Emergency Operations Plan: Section 8

☒ (K) A pandemic preparedness plan.

Addressed via:

- Pandemic Preparedness Plan

☒ (L) A hurricane plan, including evacuation and re-entry procedures (if facilities are located within a hurricane evacuation zone, as defined by TDEM.

Addressed via:

- Emergency Operations Plan: Section 8; Section 8.4 (evacuation zone)

Drills

☒ A market entity shall conduct or participate in one or more drills annually to test its emergency procedures if its emergency procedures have not been implemented in response to an actual event within the last 12 months.

Addressed via:

- Emergency Operations Plan: Section 10
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