



Emergency Operations Plan (EOP) Requirements and Filing

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May 14, 2026



Agenda



Topics that will be covered today

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



Texas Utilities Code § 186.008

Railroad Commission Weather Emergency Preparedness Reports

(b) The Commission shall analyze emergency operations plans developed by operators of facilities that produce, treat, process, pressurize, store, or transport natural gas

and are included on the electricity supply chain map created under Section 38.203

and prepare a weather emergency preparedness report on weatherization preparedness of those facilities.

Statutory Authority (2 of 3)



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

Statutory Authority (3 of 3)



- In preparing the report, the Commission shall
 - Review EOPs on file
 - Analyze and determine the ability of the electric supply chain to withstand weather emergency events
 - Consider the anticipated weather patterns

Filing Deadline



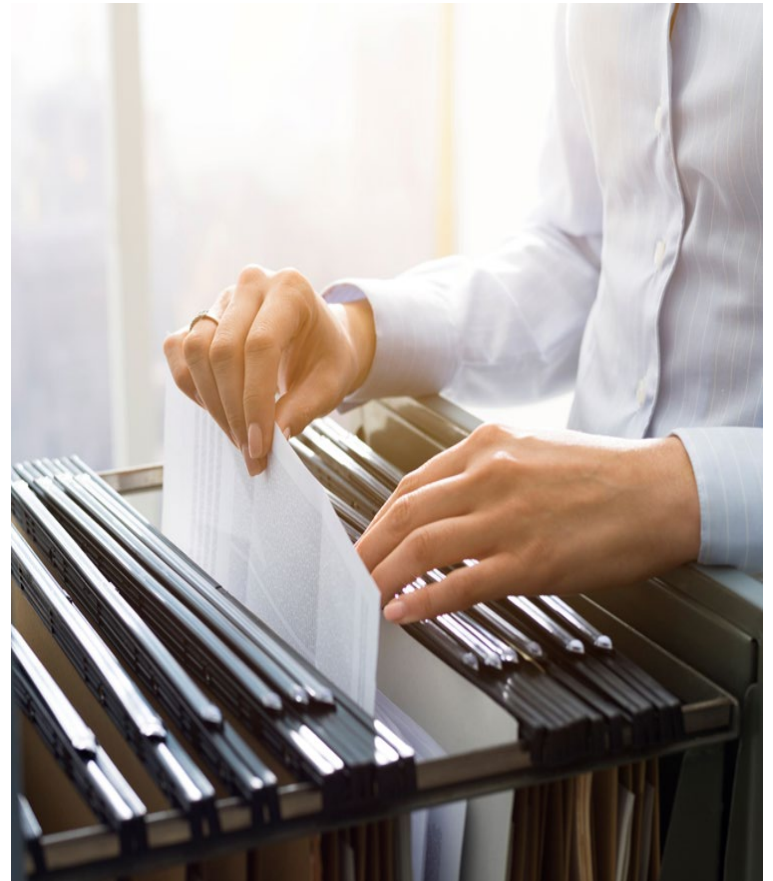
- EOPs are due by August 1, 2026
- Operators on supply chain map that are needing to file should have received letter from CID mid May 2026
- EOPs will file through the CID Portal Dashboard on the RRC Online System



Filing Details (1 of 3)



- Operators are required to file an **unredacted** EOP per P5 number
- Operators may, in addition, submit a redacted EOP
- Consolidate all facilities in the EOP
- The filings portal for EOPs is now open and will remain open for any operators to gain compliance



Filing Details (2 of 3)



Railroad Commission of Texas

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 (Displaying 1 - 20 of 254)

	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	

Menu

- Home
- RRC Online
- Dashboard
 - Dashboard
 - EOP Dashboard
 - EOP Dashboard
 - Upload EOP Data
- Submit Forms
 - Submit Form CID
 - Submit Form CIX
- Submit All Forms
- Mark CID Forms Submitted
- Mark CIX Forms Submitted
- Multi Delete
 - Delete Multiple Applications
- Help
 - User Guide

Filing Details (3 of 3)



Upload Attachments

Select EOP Filing Type

Select EOP Filing Type

Redacted (Optional)

Unredacted

... below to complete your document upload(s)!!

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

Upload Attachments

Select EOP Filing Type

Select Filing Session

Select Filing Session

2026 Submission

2026 Significant Revision

... below to complete your document upload(s)!!

...d. 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

EOP Requirements (1 of 2)



Emergency Operations Plan (EOP) in accordance with Texas Utilities Code § 186.008. The EOP is due **August 1st of every even numbered year**. Please provide an unredacted, and if applicable, redacted version of the EOP, through the Commission's RRC Online application. If your company has more than one EOP, please combine them into one submission.

Please send any questions regarding the EOP to the Critical Infrastructure Division (CID) by email at CID@rrc.texas.gov and understand that additional notices may be provided such as instructions for the online submission process. Below is a baseline set of required guidelines for preparing the EOP:

1. Introduction

a. Table of Contents <ul style="list-style-type: none">Section headersInclude page numbers in table and on each page of the document
b. The legal name of the company and the Commission issued P5 number and contact information <ul style="list-style-type: none">Company nameP5 numberOffice addressPhone number
c. System(s) Overview including general location and types of facilities <ul style="list-style-type: none">Type(s) of facilities included on the Texas Electricity Supply Chain MapGeneral facility location(s): county and/or address
d. Describe how applicable personnel receive training on topics included in this EOP <ul style="list-style-type: none">Training topicsFrequency of trainingHow training is trackedInclude a statement with the date(s) that training has been performed
e. Individual(s) responsible for maintaining and implementing the EOP <ul style="list-style-type: none">Assign specific person(s) to maintain and implement the EOPProvide name, title and phone number
f. Individual(s) authorized to activate the EOP or section(s) of the EOP <ul style="list-style-type: none">Assign specific person(s) to activate the EOPProvide name, title and phone number
g. Individual(s) authorized to revise the EOP <ul style="list-style-type: none">Assign specific person(s) to revise the EOPProvide name, title and phone number
h. Effective Date <ul style="list-style-type: none">Date the EOP becomes effectiveInclude the term "Effective Date"
i. Distribution <ul style="list-style-type: none">How the EOP will be given to applicable personnelHow distribution is trackedFrequency of distribution

- We have provided an EOP Guidelines PDF
 - “file name”
 - Please refer to it when creating your EOP
- The file is also available in the chat

EOP Requirements (2 of 2)



- EOP review process
 - EOPs will be reviewed under the required guidelines as set out in the notification letter
 - Each bullet point in the guideline will be scored as Present, Partially Present, or Not Present



- Table of Contents
 - Section headers
 - Include page numbers
- Operator Information
 - Company name with P-5
 - Office address
 - Phone number
- System(s) Overview
 - General locations
 - Facility types



Introduction (2 of 3)



- Who maintains and implements the EOP
- Who is authorized to activate the EOP
- Who is authorized to revise the EOP
 - Provide name, title, and phone number for each



Introduction (3 of 3)



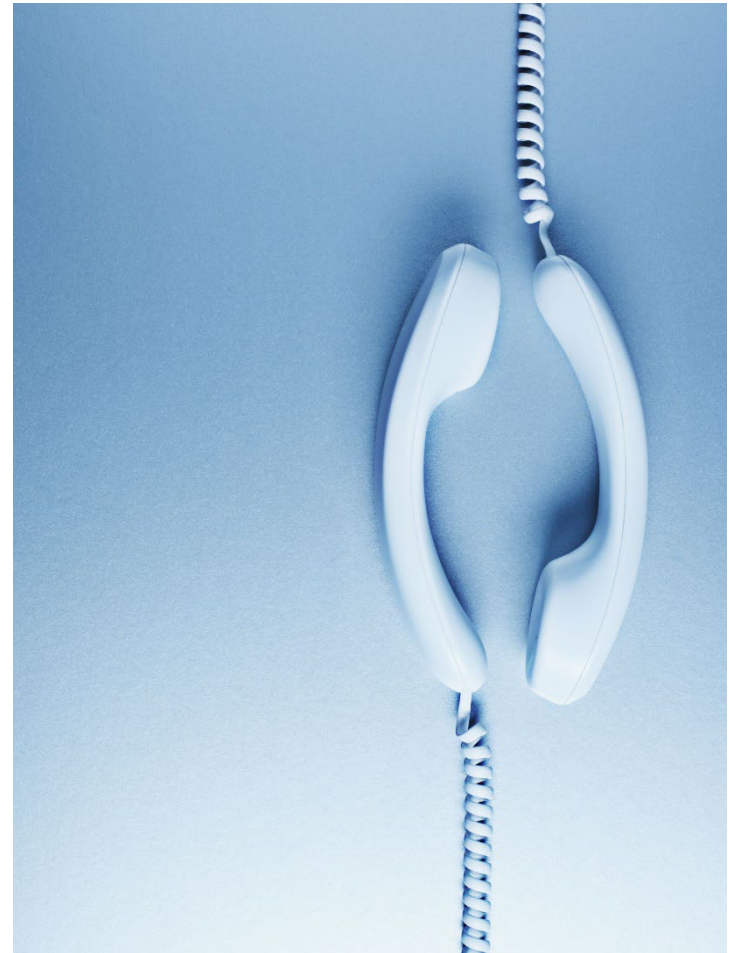
- Staff training on the contents of the EOP
 - Topics
 - Frequency
- Effective Date
 - Date of EOP becomes effective
 - Must include the term, “Effective Date.”
- Distribution
 - How and when?



Communication (1 of 2)



- Procedures for communicating within the company during an emergency
 - Key employees
 - Names
 - Phone number



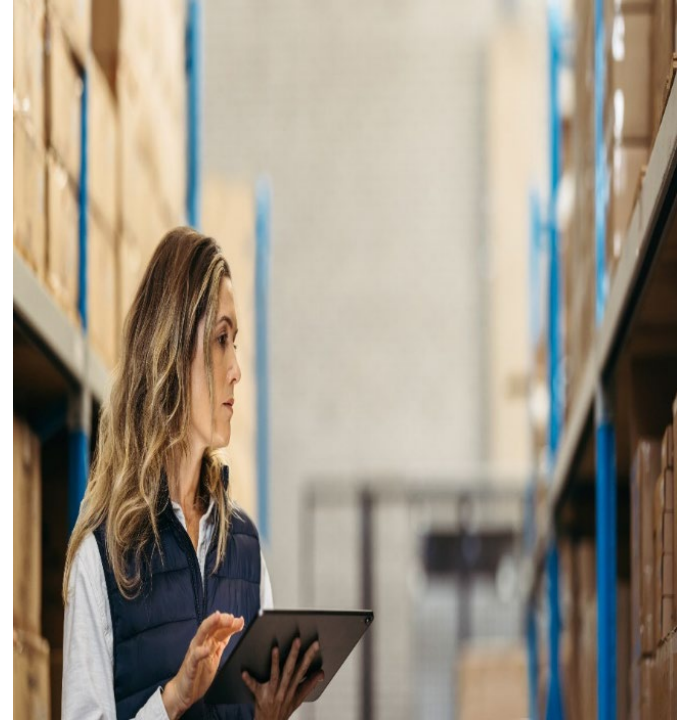
- Procedures during an emergency for communication with
 - Critical customers
 - State and local emergency operations centers (EOCs)
 - Local and state governmental entities and officials
 - RRC
 - Media





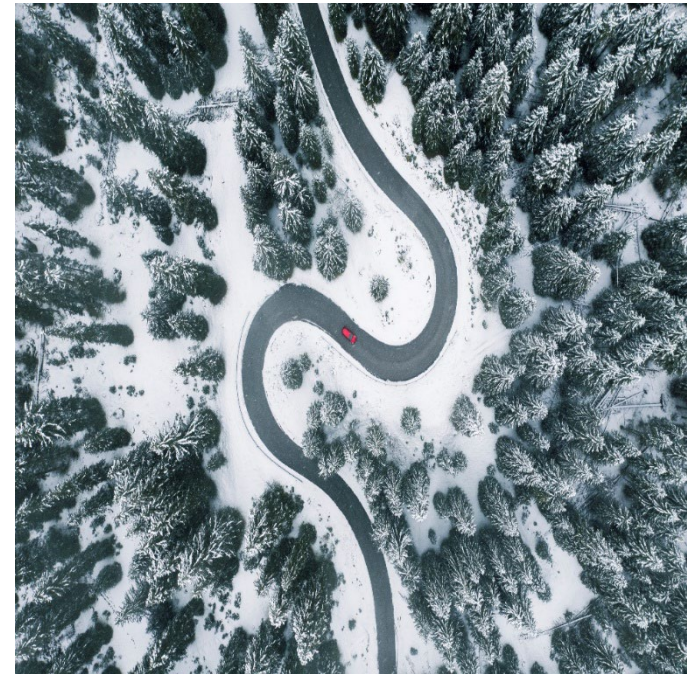
Preparedness

- Supplies, parts, and equipment
 - Maintained and stored
 - List of examples
- Test critical equipment ahead of emergencies
- How to address staff during emergency response





- Identifying weather-related hazards
 - Describe how your company stays weather-aware
 - Include the personnel responsible for monitoring the weather





- EOP drills and tests
 - Discuss how they are performed
 - Frequency and/or date
- Corrective Actions
 - Discuss issues identified
 - Action taken to correct
 - If no issues identified, make a statement why





Response

- EOP activation
 - Describe what triggers EOP activation
 - Describe how the EOP is activated, and how employees are notified
- EOP response actions
 - Describe response actions once the EOP is activated

Restoration of Service

- Describe actions to make the facility operational again
 - How to return to normal operations
 - How to return staffing levels



EOP Reviews



EOPs will be reviewed by RRC staff through the RRC Online Dashboard

- Criteria Complete → **Administratively Complete**
- Criteria Incomplete → **Reviewed**

Operators will receive a letter regarding the status of the EOP. The letter may include remarks regarding the incomplete criteria.

Frequent Mistakes



- Record of distribution
- External communication
- Table of contents
- Tabletop exercises / Correction action(s)
- Systems overview

CID Staff



- Aaron LeJeune – CIX and Special Projects manager
512-305-8834 or Aaron.LeJeune@rrc.Texas.gov
- Holt James – Administrative Support team
512-463-6827 or Holt.James@rrc.Texas.gov
- Nicolas Stasulli – Compliance CID team
512-463-6957 or Nicolas.Stasulli@rrc.Texas.gov
- Gilbert Herrera – Field Ops CID Director
713-869-5001 or Gilbert.Herrera@rrc.Texas.gov
- Mysti Doshier – Assistant Director of CID
512-463-6999 or Mysti.Doshier@rrc.Texas.gov

Q&A



- Please put your questions in the chat