

EHS&R Newsletter

THIRD QUARTER 2023

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CAMS Community Involvement Highlights

CAMS is dedicated to enriching the communities in which we live and work. In this newsletter, we highlight several causes and activities that staff at CAMS facilities and our corporate office are supporting through engagement, volunteerism, and charitable contributions. Sites featured in this issue of the EHSR newsletter include Merom (page 2), Vandolah (page 4), Long Beach (page 5), CPV (page 7), Saguaro (page 8), and Conemaugh (page 10). Let us know what your facility is doing!

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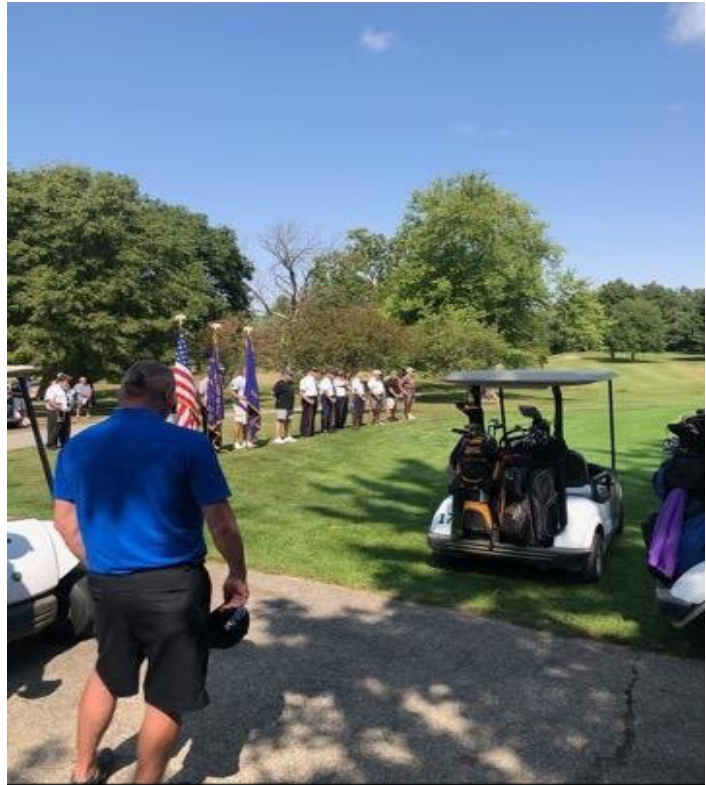
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Merom Generating Station Supports Local Charities

This year Merom Generating Station personnel continued their long history of active community involvement through donations of both time and money. With the support of their owner, Hallador Power Company, and CAMS, the team provided support to families dealing with cancer, local veterans, and neighbors experiencing significant losses due to tornado damage.

Bobby Forbus, Operations, volunteers as the Chairman of the Sullivan Elks Veterans Committee and was instrumental in organizing two charity golfing events for the benefit of the local area: the Smash For Mash Scramble and the “Fore” Veterans Scramble. CAMS was pleased to provide Corporate Sponsorship for both events, and Bobby along with David James, Purchasing, attended in person.



The Sullivan Elks Country Club Smash Fore Mash Scramble raises money to support cancer research and expenses incurred by local individuals and families who are battling cancer.

The “Fore” Veterans Scramble is an annual event that assists local active-duty service members, veterans, and their families. Money raised has supported local scholarships, contributed to a van for Sullivan County Veterans, and funded banquets for Hero’s New Hope Foundation. This year’s event, which raised a total of nearly \$7,000, was particularly successful. Bobby expressed his appreciation for everyone involved: “I would like to thank everyone for their support to our cause. This has been the best year for the Veteran’s Scramble since I have managed the event. Thanks, everyone.”

Merom (continued)



Also, earlier this year, a massive tornado system destroyed numerous homes and businesses in Sullivan County. A local fund, the Help Sullivan Recover Fund, was established to provide both immediate and long-term aid to those who were adversely affected. Merom workers provided direct contributions via payroll deductions which were matched by Hallador Power as well as CAMS. A significant donation of over \$100,000 was also made by Hallador Energy Company, the parent company of Hallador Power and Sunrise Coal.



Merom Generating Station is a 2-unit, 1,080-MW rated coal-fired power plant located in Sullivan County, Indiana. The plant has operated since 1982 and plays a vital role in helping to meet grid demand in the Midwest.

Vandolah Emergency Responder Day

By Calvin Bates, EHS Manager



As part of their community outreach efforts and safety training, the employees at Vandolah Power host an Annual Emergency Responder Day during which they drill with the local fire and police departments for response and rescue. Additionally, they conduct a separate exercise with their Oil Spill Response Organization (OSRO). After the events, everyone gathers for an informal lunch.

This year, Calvin Bates, the plant EHS Manager, and the Site Safety Committee organized a Fire Department drill that simulated a structure and vehicle fire within the plant. All 14 employees were involved in some aspect of the event. The participating agencies included Hardee County EMS and Fire Rescue,

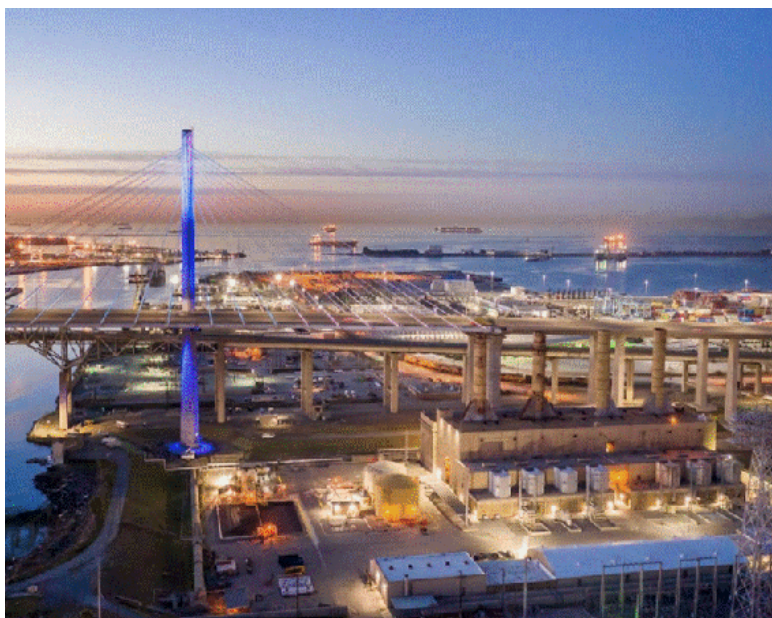
Hardee County Sheriff's Office, Wauchula Police Department, Hull's Environmental, and Hardee County Emergency Management. The OSRO exercise centered around a fuel oil tank rupture.

A key takeaway from the drill was that operations personnel should be stationed at the plant entrance gate to give face-to-face directions to the incident site. Even though the control room remains on the phone with the responder's dispatch, it can be difficult to effectively communicate directions in this manner. Another learning point was that it is necessary to account for additional portable structures, such as contractor outage trailers and equipment when determining the best way to access fire hydrants and monitor the situation.

Calvin noted, "These annual drills are important for several reasons, but due to Covid and hurricane cancellations the past few years, this one was special. We welcomed a new Sheriff, Police Chief, and Fire Chief to their first Responder's Day. Giving these responders a perspective of what performing these types of tasks on our actual site helps with planning in the case of an actual emergency and helps keep both Vandolah personnel and responders safe."

Vandolah Power Company L.L.C. is a 680 MW dual fuel peaking plant located in Wauchula, Hardee County Florida. The plant is indirectly owned by Northern Star Generation LLC and is operated by CAMS.

Long Beach Generating Stations Donates Proceeds to Charity



Long Beach Generating Station (LBGS) hosted the cast and crew of the CBS series S.W.A.T. earlier this spring and served as a location for the filming of the show's Season Six finale. The staff and management team at LBGS, which provides electricity to the Southern California Edison grid, contributed the proceeds from the television shoot to two local charities supported by plant staff: Homes For Our Troops and the Los Angeles Maritime Institute TopSail Youth Program. The two charities were chosen from a poll of station staff. Each organization received \$25,000, which the S.W.A.T. production team contributed as a condition of filming at the station.

"I want to extend my heartfelt gratitude to everyone involved in making this day a success, particularly the dedicated staff and management team at LBGS. Your enthusiasm and generosity allowed us to not only host the cast and crew of S.W.A.T., but to turn it into a meaningful opportunity to give back," said Rob Suida, LBGS Plant Manager. "As we move forward, we remain committed to not only delivering reliable electricity to the Los Angeles area but also being an active and caring member of our community."

The Long Beach Generating Station is a natural gas-fired power plant located in Los Angeles County, California. It has a total capacity of 252 megawatts and consists of four simple-cycle turbines. The plant was repowered in 2007 by NRG Energy before Generation Bridge, LLC acquired the asset in 2021.



Long Beach Generating Station's scenic setting on the Pacific Coast, its proximity to Los Angeles, and its dramatic, industrial aesthetic made it a natural fit for the season finale of S.W.A.T. This is a perfect example of the community orientation of Long Beach Generation, our affiliate, Generation Bridge, and our operator, CAMS.

-Dan Consie, Senior Vice President, Portfolio Management



Corporate Office Charity Activities

During this quarter, our Houston corporate office participated in several community activities including an afternoon at the Houston Food Bank, a school supply drive, and an outreach for the local SPCA.

Houston Food Bank

A team of about 38 Houston Corporate office employees and family members joined forces to support the Houston Foodbank for an afternoon of packing and organizing donated food items for community distribution. The group was able to assemble 17 pallets of food which will be used to provide nearly 11,000 meals to people in need.

The event was organized by Ana Gutierrez, Human Resources Generalist, who commented “This was a great opportunity for CAMS’ employees to come together and help our wonderful community. We hope to do this event again next year and hope for more CAMS employees to join the good cause! The Houston Food Bank is a non-profit organization and the nation’s largest food bank by distribution; providing access to 207 million nutritious meals in 18 counties in southeast Texas.



School Supply Drive

Back-to-school season was made easy, thanks to the CAMS corporate office!

The Houston Corporate office employees donated 39 backpacks filled with essential supplies like paper, notebooks, binders, scissors, glue, pens, pencils, and rulers to local students in need in support of the 2023 YMCA of Greater Houston Operation Backpack. CAMS participates annually in this local initiative which benefits over 20,000 children each year. Enriching the communities in which we live and work is a core value for CAMS, and there’s no better way to invest in our future than by supporting initiatives championing education.



Yappy Hour

Several members of the CAMS Corporate Team took advantage of an opportunity to both unwind and to support the Houston SPCC. The event sponsored by Hines Building Management and the SPCC was held in the tunnel system below our office and allowed staff to reserve relaxation time throughout the day with friendly kittens and puppies. The occasion helped to foster awareness of pet adoption and of the physical and emotional benefits of pet ownership.

CAMS Joins CPV Efforts to Further Cancer Research



Each year, Competitive Power Ventures, Inc. (CPV), the owner of the CAMS-operated Woodbridge, St. Charles, and Three Rivers Power Generation facilities, sponsors the John Murphy Memorial Golf Tournament to honor the memory of their late colleague, John Murphy. Funds raised from this event support esophageal cancer research at Massachusetts General Hospital.



CAMS was pleased to be able to make a financial contribution to this important cause. Greg Bobrow, COO, commented, "Our employees support CPV and Mass General in this effort to further research and provide for the patients and families impacted by cancer."

Saguaro: Proactive Waste Management Benefits Blind Center

While searching for disposal options for several years' worth of computer monitors, keyboards, printers, radios, and other used electronic materials, Saguaro Power Station EHS Specialist Karen Luna, discovered a way to beneficially recycle these materials and also help the Blind Center of Nevada. Steve Swift, Operations & Maintenance Manager, and Karen interviewed staff at The Blind Center of Nevada Electronic Recycling Refurbishing Operation and found that the organization could repurpose or recycle Saguaro's used electronic materials in an environmentally friendly way, with 100% of the proceeds going directly to the Blind



Center of Nevada, a 501(c)(3) organization (<https://www.blindcenter.org/>). The Electronic Recycling Refurbishing Operation employs those who are visually impaired, creates revenue to help the blind community, and helps keep our environment clean.

Reynaldo Cerda, Warehouse Assistant ensured the entire facility was cleared of electronic materials and that all materials were gathered into a single pick-up area. The Blind Center provided free pick-up, secure data destruction, and recycling/repurposing services.

Now that the backlog of materials is removed from the site, the plant will continue to utilize the Blind Center for the disposal of electronic components as they complete their useful life cycle.

Saguaro Power is a 127 MW natural gas power plant located in Henderson, NV. The plant is owned by Paragon Assets and is operated by CAMS.



Keys Adds Sustainable, Efficient Capacity

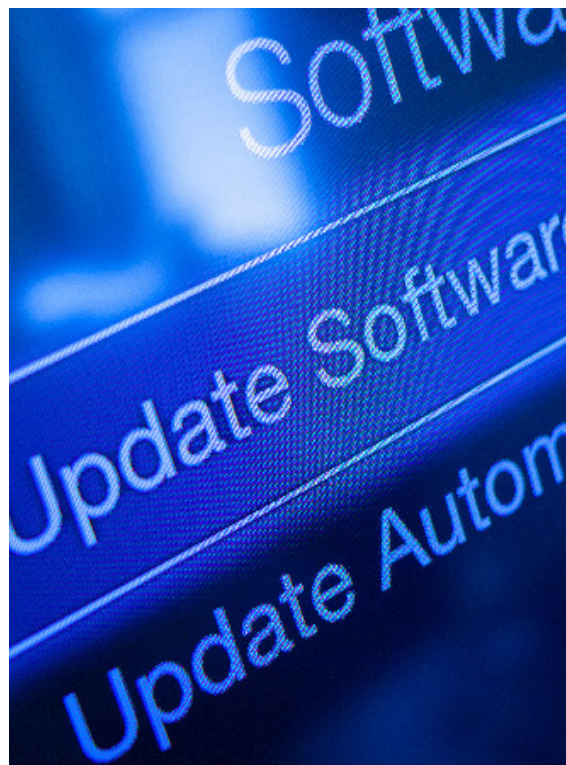
By Derek Furstenwerth, Senior Vice President, Environmental Services

In July, Parkway Generation Keys Energy Center (“Keys”) received approval from the Maryland Department of the Environment (“MDE”) to install “peak firing” capability on Keys units 11 & 12. Peak firing does not require physical modifications to the units, has relatively low costs, and does not cause an increase in actual or potential emissions. It is commonly achieved, and was achieved in this case, by the installation of a software update allowing the units to operate at a higher firing temperature.



Peak firing is an adjustment to the combustor inlet temperature that enables better performance during peak ambient temperatures when combustion turbines are generally unable to reach full capacity. The implementation of peak firing makes additional megawatts of generation available during times of peak demand. The increase in firing temperature also improves unit efficiency.

The estimated total increase in generating capability on Keys 11 and 12 from implementation of peak firing temperature increase was 13 megawatts (“MW”).



In summary, the Keys peak firing temperature increase enables Units 11 and 12 to provide an approximate additional 13 megawatts of generating capacity during the hottest days when demand is highest, while improving efficiency. This is an excellent example of sustainability in CAMS’ fleet operations and represents a win-win for Parkway Generation and the environment.

Keys is a 2 x 1 natural gas combined cycle plant with Siemens 501F gas turbines and a total generating capacity of 761 MW. The plant is part of the Parkway Generation portfolio owned by an ArcLight investment fund and is operated by CAMS.

Conemaugh Station Employee Safety & Appreciation Month

By Barry Hunt, Conemaugh Plant Manager

September was deemed employee safety and appreciation month at Conemaugh Station. Each week during the month a safety handout was developed and then distributed to all employees to review which included plant safety topics as well as home safety topics. Conemaugh also completed its annual plant evacuation drill on September 12 with a simulated bomb threat.

Every Wednesday of the month, a food truck was brought on-site for all employees to enjoy. This was well received and appreciated by all employees.

The Employee Safety & Appreciation Month was wrapped up with a Family Safety & Appreciation Day. Over 200 employees and guests attended. The day included walking tours of the plant as well as a number of workshops and displays followed by a catered lunch for all who participated. Events included a Hands-On Fire Extinguisher Workshop that taught children and adults how to use a fire extinguisher with a simulated fire.



A Distracted Driving Simulator was also set up that allowed the kids to drive under normal conditions and then put on goggles that simulated being drunk or high and then have them try to drive the same course. Joe Kushner, Strategy and Compliance Manager, set-up a science table where he demonstrated how Conemaugh makes electricity with actual live models of a boiler that heated water and generated steam and then turned a turbine/generator and lit up a light bulb.



Conemaugh (continued)

He also built a model of a boiler that burned coal and then the dark flue gas that was generated went through a mini scrubber with actual reagent that scrubbed the smoke and then discharged the clean smoke out a stack. The Station Emergency Response Team (SERT) members were on hand to talk about their roles and responsibilities and to demo some of the station's SERT equipment. In addition, R&L staged a YUK truck and several large pieces of mobile equipment in the parking lot for everyone to observe. There were games and raffles with nice science and safety-related gifts for all of the kids who attended.



The administrative staff did an excellent job of planning for and executing the event and it was very well received by everyone who attended. Conemaugh Generating Station is a 1,711 MW coal-fired power plant located in New Florence Pennsylvania and is operated by CAMS. The plant is owned by Chief Conemaugh Power LLC, Conemaugh Power Pass Through Holders LLC, Conemaugh Power LLC, Montour LLC, and Chief Conemaugh Power II LLC.

CAMS Matching Gift Program

Charitable donations to certain organizations are eligible for matching funds from CAMS. For more information about the Matching Gift Program or to obtain a CAMS Matching Gift Form, contact Michelle Stewart in the Human Resources Department (mstewart@camstex.com). Also, CAMS employees can record their 2023 volunteer hours and charitable contributions on our [website](#). This information is compiled for our Annual ESG Report.

Working Alone - Working Safe

By Ximena Castenada, Health & Safety Specialist

As the energy market continues to shift towards a higher concentration of renewable power, we must address the increased likelihood of technicians working alone in remote locations. While many of the tasks at renewable sites have less inherent risk than at a traditional power plant, there can also be greater consequences associated with incidents due to the increased reaction time for treatment and emergency response. Whether it's a work-related injury or a personal medical condition, rapid treatment is key to ensuring individuals will be able to recover.

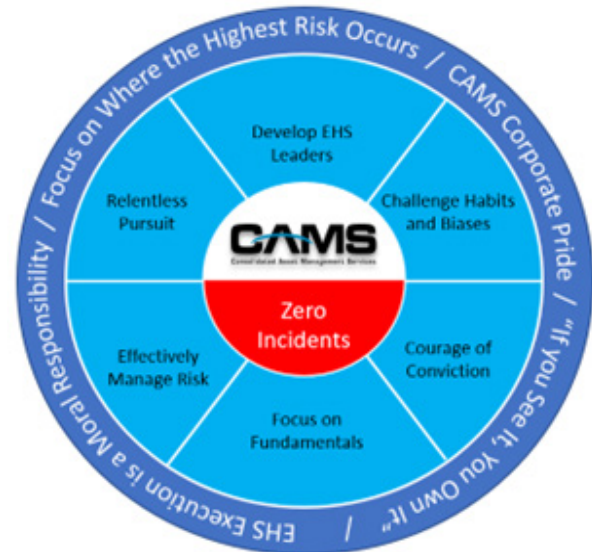
CAMS employees work safely, following their JSA and planning their routes and job tasks. But what is CAMS doing proactively to ensure the safety of the employees who work in remote locations?

To Effectively Manage our Employees' Risk, CAMS ensures remote employees have the same level of protection as all other employees. Our goal is to make sure they come back home to their families safely, and incidents get reported immediately.

To combat the major dangers associated with working remotely, CAMS engages a third-party company that monitors our remote employees during their shifts, regardless of the time of day, making sure they are safe and healthy by using the Solo Protect device.

Each Renewables employee has a personal Solo Protect device that is turned on during all work shifts.

This device has several options to monitor the status of the employees and identify potential safety-related situations:



1. CHECK-IN

The device has GPS monitoring that is activated when the employee first Checks-In for the day, providing location management for faster response in the event of an emergency.

The employee can record a voice message up to 20 seconds in length, including the following Check-in information:

- Address of the current location (zip code, City, and State)
- The expected duration of the visit
- Any perceived risks
- Employee's full name



Working Alone - Working Safe (continued)



2. RED ALERT

The Red Alert tool may be used as a panic button when safety is under threat, there is a personal medical condition, or any injury occurs that requires immediate first aid or medical assistance. When the Red Alert is activated, the monitoring center is able to listen to the situation in real-time. There are three ways an employee can activate the Red Alert:

- Via the red button on the front and back of the device
- Via the touchscreen icon
- By pulling out the Rip Pin

3. INCAPACITATION ALERT

This tool is available at all times when the device is activated. It can remotely detect when a slip, trip, or fall occurs, and initiate a two-way call with the monitoring center. When the device records a slip, trip, or fall, a Pre-Alert Phase is established for 2 minutes, during which the employee will hear a tone and 4 short vibrations. The alert may be canceled during this time period if there was not an actual incident and the employee is okay. If the Alert is not canceled, a 2-way call with the communications center is initiated. The operator will try to talk with the employee through the device. If the employee doesn't answer the operator will contact CAMS and ensure emergency medical responders are sent to the employee.



4. READY2TALK

The Ready2Talk feature allows the employee to talk directly with an operator when a risk is identified. The operator will remain in contact with the employee until the employee confirms the hazard is safely managed or any needed emergency response is received. In addition to utilizing the Solo Protect device, CAMS employees use other methods to prevent accidents and reduce response time in the event of an emergency:

- The diary JSA, allows the employee to identify hazards, analyze of the environment and task to be performed, and report any anomalies, changes, or hazards.
- Online reports of good catches, safety suggestions, safety observations, and near misses. Near misses are the first warning sign of a potentially unsafe condition.
- Monthly health and safety meetings, regular training on procedures, and round table discussions, where employees may bring up topics, suggestions, or questions related to health and safety.
- Stop work authority and report all incidents or near misses immediately to Supervision and Health and Safety (no matter how small).
- When an incident occurs, conduct a complete investigation, including root cause analysis, communication, and the development of an action plan to prevent incidents from happening in the future.

Bird and Bat Conservation Strategy

By Michael Bagnasco, Environmental Project Manager and Yonatal Iasu, CAMS Intern



At CAMS we pride ourselves on our unwavering commitment to environmental stewardship. In our roles as owner's representatives, asset managers, and operators for various energy projects, CAMS understands the importance of balancing the need for sustainable energy with the responsibility to protect our natural environment. Wind energy projects, while a reliable source of renewable energy, have the potential to affect migratory bird and bat populations. These impacts can range from habitat loss, fragmentation, and to a lesser degree, potential direct mortality due to collisions with wind turbine blades.

The Endangered Species Act (ESA), Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, as well as state-level threatened/endangered (T&E) species regulations protect vulnerable species from "incidental take" which is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Incidental take can be permitted under the above legislations, but often involves extensive studies to quantify the extent of impacts. Wind sites are not typically required to apply for an incidental take permit at the state or federal level, but they are held responsible if and when incidental take occurs as a result of their operations. Significant penalties can arise as experienced by NextEra Energy Resources' subsidiary ESI Energy Inc. (ESI) which was sentenced to a fine of more than \$1.8 million, restitution of \$6.2 million, and five-year probation after at least 150 bald eagles died at 50 of its US wind sites.¹

For our wind energy projects, CAMS and our respective project owners voluntarily develop and adopt a Bird and Bat Conservation Strategy (BBCS). Additionally, recommendations from the National Wind Coordinating Committee (NWCC) and local recommendations in the Voluntary Guidelines for Wind Energy Development are formulated into a strategy which identifies and proactively mitigates potential risk of adverse effects to healthy habitats and wildlife populations.

¹<https://www.npr.org/2022/04/06/1091250692/esi-energy-bald-eagles>

Conservation Strategy (continued)

The BBCS is individually tailored to each site’s regional geography and habitat and often includes extensive avian identification and use surveys, nest surveys, fatality model design, and acoustic monitoring. Environmental and biological studies and monitoring begins years before project permitting and construction with habitat assessments. Where risks are identified within the project areas, conservation strategies are developed, and post-construction monitoring (PCM) is performed. The purpose of these studies is to identify the actual risks imposed by operations and areas where mitigation efforts would be most effective. The most common mitigation technique is curtailment, or shutting down turbines during conditions when the risk of collisions is higher, such as during peak migration season or the siting of T&E species within the project area. More sophisticated mitigation methods include technologies that detect birds or bats near turbines and either deter them with audible or visual signals or automatically curtail the turbine.



The CAMS Environmental Awareness Training program covers the identification of species and operational response actions in the event of a T&E siting.

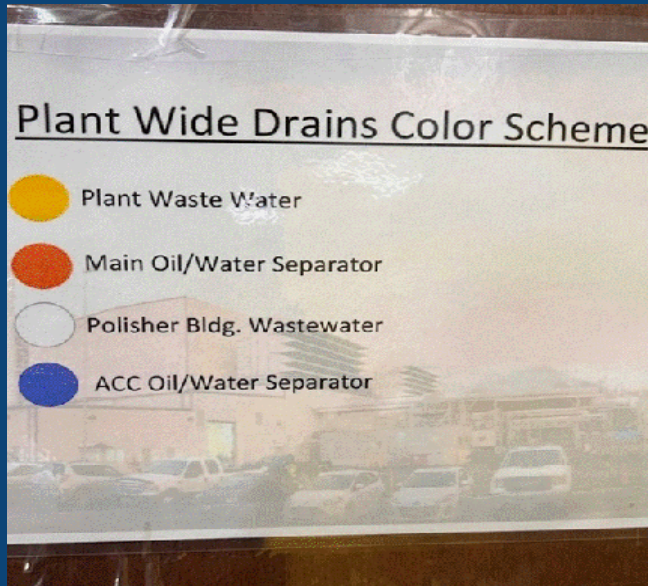
Operators are instructed how to use the Wildlife Incident Reporting System (WIRS) to document the siting. Operations vehicles are supplied with laminated T&E avian identification cards and the WIRS reporting form. CAMS is currently in the process of updating all BBCSs throughout all wind projects and has recently commenced a relationship with a local wildlife rehabilitation center with specially trained biologists to have as a resource to CAMS, if needed.



CAMS believes that sustainable energy and environmental conservation are not mutually exclusive. Through the efforts of our diligent Site operations personnel and our voluntary adoption of the BBCS and strict adherence to the regulatory framework, we aim to set a gold standard in the industry, proving that it is possible to harness wind energy while also protecting our valuable environmental resources, particularly, our precious bird and bat populations.

Keys Environmental Best Practice

By Cameron Keith, Environmental Associate



Keys Energy Center

Combined cycle generation facilities require various wastewater systems and oil-water separators to ensure wastewater and stormwater are properly treated prior to reuse or discharge offsite. Given the size and scale of the plant systems, there may be numerous drains located at the facility leading to different treatment mechanisms and discharge points throughout the plant..

To aid in the rapid identification and detection of the ultimate point of discharge, Keys created a drain cover color-coding system that identifies the ultimate discharge point for each drain. For example, orange-colored drains go to the main oil water separator and yellow-colored drains go to the main plant wastewater system. The color-coding system allows plant personnel who are out in the plant to easily identify the treatment system associated with a particular drain. In the case of an accidental discharge, they can quickly relay information to plant operators to facilitate a streamlined response and cleanup if necessary.

Keys Energy Center, located in Brandywine, Maryland, is a 2 x 1 natural gas combined cycle plant with Siemens 501F gas turbines and a total generating capacity of 761 MW. The plant is part of the Parkway Generation portfolio owned by an ArcLight investment fund and is operated by CAMS.

NERC Focus - Dispersed Power Producing Resources

By Kyle Morgan, Manager, NERC



The North American Electric Reliability Corporation (NERC) is responsible for the reliability and security of the Bulk Electric System (BES). They do so through the development and enforcement of a series of Reliability Standards that all Regional Entities must comply with. These Reliability Standards fall under one of two categories, Critical Infrastructure Protection (CIP) and 693, which is all Standards not CIP. CIP continues to be a focus within NERC due to the increase in cyber attacks and an aging infrastructure; however, there has been a recent push for increased regulations and a lower threshold of applicability for Dispersed Power Producing Resources (i.e., wind and solar). As these regulations are developed and implemented, the CAMS Corporate Regulatory team will be available to assist our impacted facilities.

Industry Trends - According to the United States Energy Information Association (EIA), energy consumption will increase in the U.S. over the next 30 years across a variety of economic scenarios as population and economic growth outpace energy efficiency gains.¹ Although this growth is not specific to a given industry, its effects will be felt across all industries, including power generation. The need for new conventional, renewable, and even nuclear power facilities will

continue to increase in the coming years with renewable growth set to far exceed conventional due to the Paris Climate Agreement. The goal of the Paris Climate Agreement, which the U.S. signed in 2016, is to reduce the global carbon dioxide (CO₂) emissions to net zero by 2050 to then limit the long-term increase in average global temperatures to 1.5 °C.² With this goal in mind, the industry is set on installing new wind and solar generation. The EIA projects that the share of U.S. power generation from renewables will increase from 21% in 2021 to 44% in 2050.³

NERC and Inverter Based Resources - The rapid growth of renewable wind and solar Inverter Based Resources (IBR) is causing NERC, whose responsibility is the reliability of the electric grid, a lot of trouble.

After tracking several grid disturbances over the past few years, NERC has narrowed down the issues with IBRs to the following:

- Protection system setting inconsistencies and unexpected performance
- Facility disturbance ride-through ability
- Ineffective interconnection studies
- Modeling inconsistencies; and
- Lack of IBR performance issue notification, analysis, reporting, and mitigation.

NERC Focus (continued)

NERC plans to address these issues through a series of ongoing and future projects. The following projects are currently being worked on by NERC and industry leaders, to address some of the issues with IBRs:

Project 2020

- 02: PRC-024 modifications
- 05: FAC-001 and FAC-002 modifications
- 06: Generator model and data verifications (MOD-026 and MOD-027)

Project 2021

- 01: MOD-025 and PRC-019 modifications
- 02: VAR-002 modifications
- 04: PRC-002 modifications

Project 2022

- 02: TPL-001 and MOD-032 modifications
- 04: EMT Modeling

Project 2023

- 01: EOP-004 IBR Event Reporting
- 02: Performance of IBRs
- IEEE Standards Association Project 2800 (IEEE P2800)
 - Institute of Electrical and Electronics Engineers (IEEE) in cooperation with NERC and other organizations

Each one of the above projects reflects modifications to one or more existing NERC Standards or the implementation of all new Standards. The scope of these projects covers almost half of all Generator Owner applicable 693 Standards, and more projects are still in development. Essentially, all of 693 is being overhauled to better incorporate IBRs into the NERC Standards.

While NERC can regulate IBRs that are registered, as of 2021, roughly 24.3 GW out of a U.S. aggregate of 176.4 GW of IBRs are unregistered.⁴ Of the 24.3 GW of unregistered IBR facilities, 62.5% are plants 20 MVA to 75 MVA interconnected at a

voltage greater than or equal to 100 kV and 25% are plants with an aggregate capacity greater than or equal to 20 MVA interconnected at a voltage less than 100 kV.⁵ NERC has no ability to ensure the reliability and security of the BES for grids that have a larger number of these unregistered IBR facilities. To address this, NERC plans to modify the NERC Rules of Procedure definition of “Bulk Electric System”, which in turn dictates what size of facility is required to register with NERC. The current definition of BES requires the registration of any generating resource, conventional or renewable, with a gross plant/facility aggregate greater than 75 MVA and a point of connection at a voltage of 100 kV or above. The proposed change to the definition of “Bulk Electric System” includes the following:

- Owners of IBRs which have aggregate nameplate capacity of less than or equal to 75 MVA and greater than or equal to 20 MVA interconnected at a voltage greater than or equal to 100 kV.
- Owners of IBRs which have aggregate nameplate capacity of greater than or equal to 20 MVA interconnected at a voltage less than 100 kV.⁶

If the proposed changes are approved and ratified, all grid connected IBRs greater than or equal to 20 MVA will need to be registered with NERC. In other words, anywhere from 300 to 2,000 facilities will need to register with NERC and comply with all applicable NERC Standards. This estimate only includes the unregistered portion of facilities from 2021. The number of facilities that will need to be registered in the coming years could be double or triple these values as the industry pushes further toward renewable energy.

¹ <https://www.eia.gov/todayinenergy/detail.php?id=51478>

² https://iea.blob.core.windows.net/assets/deebef5d-0c34-4539-9d0c-10b13d840027/NetZeroBy2050-ARoadmapfortheGlobalEnergySector_CORR.pdf

³ <https://www.eia.gov/todayinenergy/detail.php?id=51698>

⁴ Analysis of the Changing Mix of Generating Resources on the BPS – NERC – February 2023

⁵ Analysis of the Changing Mix of Generating Resources on the BPS – NERC – February 2023

⁶ NERC Request for Approval of the IBR Work Plan and Request for Expedited Review – NERC – February 2023

ESG: Not Just a Catchphrase

By Derek Furstenwerth, Senior Vice President, Environmental Services



Promoting environmental, social, and governance principles is part of our daily jobs at CAMS. It means thinking about how we can run our business in a way that reduces negative impacts on the world around us. For example, the color-coded drain system employed at Keys Energy Center (page 16) is an easy-to-understand and highly visible measure that ensures team members are always aware of potential operational impacts on the environment. Implementing this system did not significantly impact the plant budget, and it incorporates environmental awareness into day-to-day work practices.

Low-cost and common-sense actions in alignment with ESG principles can be implemented at any of our plants. In fact, CAMS employees consistently seek ways to improve operational efficiencies in an environmentally conscious manner. To take this to the next level, we must spread the word.

When you see a plant team, a department, an individual, or a group using a great practice, especially if it's one you haven't seen before, TELL THEM! Let them know that you think it's great and why, and then find out if they've shared it with others at CAMS. Tell the plant manager. Tell your boss. Tell your Corporate EHS Representative. See what you can do to enable CAMS to repeat successes across the company, and across the fleet.

At CAMS, we take pride in treating our clients' assets as though they are our own. Let's synergize our efforts by consistently promoting great practices internally. As we implement proven best practices and ideas, we make CAMS a better company, and we make our clients' facilities better places.



When you see a plant team, a department, an individual, or a group using a great practice, especially if it's one you haven't seen before, tell them.

-Derek Furstenwerth, Senior Vice President, Environmental Services





BUSINESS ETHICS

Confidential Reporting

CAMS complies with the highest level of governance standards, and we stand by our Code of Ethics and Business Conduct. We believe it is important to allow for suspected violations to our code to be reported anonymously to help us further safeguard our stakeholders' confidence and protect our reputation.

CAMS' CONFIDENTIAL REPORTING PROVIDES THE ABILITY TO REPORT ETHICAL OR OTHER ISSUES THROUGH A THIRD-PARTY VENDOR, ANSWERFIRST, THAT CAN BE ACCESSED BY CALLING 346-500-6288.

Confidential reporting through AnswerFirst complements our current reporting practices, as outlined in our Code of Ethics and Business Conduct, which is available for download from Fuse at My Company->Documents.

Consolidated Asset Management Services
Environmental, Health, Safety and Regulatory Division

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