

EHS&R Newsletter

FIRST QUARTER 2024



Lincoln Achieves VPP Star Site Recertification

Courtesy of Earthrise Energy



Plant employees at Earthrise Energy's Lincoln Generating Facility in Manhattan recently celebrated earning recertification as a VPP Star site. From left to right: O&M Technicians, John Esguerra, Kevin Bray, Kevin Pomykala, and Jeff Haun.

Plant employees at the Lincoln Generating Facility in Manhattan, Illinois, celebrated their 21st year of the Occupational Safety and Health Administration's Voluntary Protection Program Star status by earning recertification in the prestigious program.

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Lincoln Achieves VPP Star Site Recertification (cont.)



The Star designation is the highest level of recognition in the VPP program, reflecting the Earthrise Energy plant's exemplary achievement in the prevention and control of occupational safety and health hazards.

The Lincoln Generating Facility is a natural gas peaker plant operated by Consolidated Asset Management Services (CAMSS) employees on behalf of Earthrise Energy, an independent power producer. Located in Manhattan, Illinois, the facility provides 656 MW of capacity, providing important grid reliability services during periods of peak electricity demand.

"In the workplace, safety is everyone's responsibility. Yet, it's easy for complacency to set in. That is why we are proud of the team at the Lincoln Generating Facility who work every day to foster a culture that emphasizes safety and excellence," said Steve Vavrik, Earthrise Energy's

Chief Executive Officer. "This important recertification is a direct result of our employees' continued commitment to operational excellence."

In awarding the site VPP Star status, OSHA noted, "All elements of the site's safety and health management programs met the high quality expected of VPP participants...Everyone leads by example and supports the implementation of continuous improvement."

"Earthrise applauds the team of Lincoln Generating Facility for their longstanding dedication to occupational safety and health," said Earthrise Energy Director of Asset Management Scott Halleran.

VPP recognizes employers and workers in the private industry and federal agencies who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. VPP participants must submit an application to OSHA and undergo a rigorous onsite evaluation. OSHA approves qualified VPP sites to one of three programs: Star, Merit, or Demonstration.

Founded to accelerate the clean energy transition, Earthrise Energy owns and operates five natural gas peaker plants in Illinois, including the Lincoln Generating Facility and Crete Energy Venture in Crete, and is building more than 2 gigawatts of renewable energy in the region.

EHS Excellence Award Recipient: Astin Smith

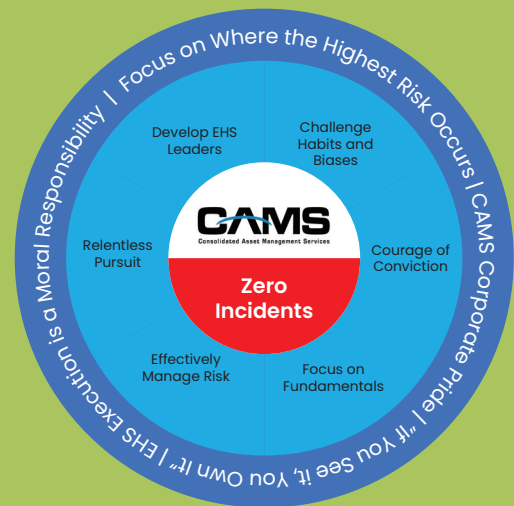


Left to Right: Nathan Hedrick – Maintenance Manager, Cesar Ruiz – Operations Manager, Astin Smith – Control Room Operator, and Jeff Perry – Plant Manager

Keys Energy Center has been developing new JHAs during 2023 and 2024. Most plant personnel were assigned at least one work task to write a JHA for.

Astin Smith, Control Room Operator, went above and beyond to develop his JHA (Aligning South Gas Yard Valves after the Emergency Valve trips), including mitigating actions for each identified hazard, pictures of the equipment and PDF diagrams of the valves to open/close in sequence.

As a result, anyone reviewing how to complete this job moving forward will have a significant potential source of human error removed through a solid job planning resource. Plant Management decided to use Astin’s JHA as a benchmark for all JHA’s for the Keys Energy Center.



Regulations Balance Energy Growth and Wildlife Conservation

By Emily Orlando, Senior Environmental Associate



Renewable energy, particularly wind power, faces a challenge in minimizing its impact on wildlife, notably birds and bats. Recent enforcement actions against companies like Duke Energy and NextEra Energy underscore the need for better regulations. On February 12, 2024, the U.S. Fish and Wildlife Service (USFWS) revised regulations (50 CFR 22) to address this issue, focusing on bald and golden eagles. Eligible wind-energy facilities and other development projects in the CAMS portfolio with the potential for eagle take or disturbance take will now be offered an expedited eagle take permitting process.

The updated regulations aim to improve the efficiency and effectiveness of permitting while providing clarity for the regulated community. The USFWS introduced general permits for activities like wind energy generation projects, powerline infrastructure projects, bald eagle disturbance take, and bald eagle nest take. While the USFWS will continue to issue specific permits for certain cases, these general permits allow an eligible applicant to bypass the extensive USFWS specific permit application and review process, and are designed to simplify and expedite the process for low-risk activities with established avoidance and mitigation measures.

For wind project general permits, applicants self-identify eligibility and submit required information and fees. The USFWS uses criteria such as eagle abundance and nest proximity supplied during the submission to determine eligibility. Approximately 80 percent of existing land-based wind turbines are estimated to be eligible for general permits.

All powerline entities are eligible for general permits, with specific permits available for those seeking customized conditions. General permits for bald eagle disturbance cover activities like construction, linear infrastructure work, and shoreline alterations. Bald eagle nest take permits are limited to emergencies, health and safety protection, and safeguarding human-engineered structures. Golden eagle disturbance or nest take permits are only available through specific permits.

The new general permits for wind energy and powerline projects mandate concurrent eagle monitoring and practicable avoidance and minimization measures to reduce the likelihood

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Regulations Balance Energy Growth and Wildlife Conservation (cont.)

of take. Compensatory mitigation, in the form of eagle credits from USFWS-approved conservation banks, is required for both general and specific permits for these projects. However, no monitoring or compensatory mitigation is needed for general eagle disturbance take or nest take permits, with the exception of monitoring to determine nestling fledging for eagle disturbance permits.

General permits for wind projects and powerline infrastructure are valid for five years, while bald eagle disturbance and nest take permits are valid for one year. The regulations allow for general permit renewal if the project remains compliant.



CAMS welcomes these finalized USFWS general permits for eagle take and looks forward to the anticipated streamlined permitting and reduced efforts and costs for eligible projects while ensuring the continued protection of bald and golden eagles. The new regulations become effective on April 12, 2024. Environmental Services will be reviewing the potential applicability and risk mitigation value with plants as annual Environmental Assessments are conducted throughout 2024. For questions about the rule, contact the author at eorlando@camstex.com.

Competitive Power Ventures Hosts Scouts

By Lauren Sparks, Compliance Specialist, CPV St. Charles, and Derek Furstenwerth, SVP, Environmental Services



Competitive Power Ventures' CPV St Charles Energy Center, located in Waldorf, Maryland, is serious about community involvement. For example, O & M Technician Javier Gonzalez is a Pack Leader for Cub Scout Pack 423, National Capital Area Council, of La Plata, Maryland. However, the CPV St. Charles team doesn't stop at volunteering at home; they bring their volunteering to work with them. For one event, Lauren Sparks, Compliance Specialist, and Jacob Boyd, Engineer, of the CPV St. Charles team, hosted 14 Cub Scouts from Pack 423 at the plant to help them pursue their Engineering Activity Badge.



The visit started with an overview of the plant, including a safety orientation. The Cub Scouts and their families had the opportunity to visit the control room and speak with the Operations Team about what is required to run the facility. They also visited the maintenance shop and warehouse, where they interacted with the maintenance team and were taken on golf cart tours of the facility by Duane Fletcher, Maintenance Manager, and Frank Katzenberger, Maintenance Technician.



After the plant tour and lunch, the focus was on the Engineering activity, in which the Scouts were able to build a Theremin. This electronic musical instrument is played by waving the hands near the instrument but never actually touching it. The Cub Scouts were assisted by Sanola Dunkley and Andrew Rowe, Operations and Maintenance Technicians. They had a great time building something with their hands and then using their creations to make weird music!

The plant team hosted a question-and-answer session following the engineering project. The experience wrapped up with a special treat from Kona Ice. This visit was one example of CPV St. Charles Energy Center's commitment to community involvement.

Conemaugh Supports Local Food Bank

Joe Kushner, KeyCon Strategy and Compliance Manager



Victoria Smothers preparing food boxes for drive-up pickup.

Conemaugh Generating Station (Conemaugh) is an 1,852 megawatt coal-fired power plant located along the Conemaugh River, in New Florence, Pennsylvania. Conemaugh is jointly owned by a consortium of parties and operated by CAMS.

Conemaugh's employees have a long history of involvement in the surrounding communities. This winter, Conemaugh employees Mickey Wyman, Victoria Smothers, Brad Nicely, Mike Petrovich, and Joe Kushner dedicated time volunteering with the Indiana County Community Action Program (ICCAP) at a local food pantry in Indiana, PA. They spent their time filling boxes with an assortment of donated food items, loading those boxes into cars, and pulling boxed and canned goods for bulk deliveries to local food banks across the county. The volunteers were impressed by the number of people who volunteer at the Food Bank on a regular basis. They learned there are a lot of families in need and found it rewarding to spend time helping an organization that does so much good for the community.

Mickey Wyman loads food boxes into vehicles of families in need.



NERC Rules of Procedure (ROP) Changes

By Jalen Tarvin, NERC/FERC Associate



One of the biggest challenges for CAMS site personnel is managing all the different compliance tasks required to operate a power generation facility. What makes it even more challenging is how often the standards are changing. NERC in particular is constantly creating projects for revising standards and developing new standards. To ensure compliance is met and reliability is maintained, CAMS site personnel must remain aware of the ever-changing standards and the implementation plans that accompany the standards. In addition to awareness, CAMS site personnel need NERC Programs that are maintained to meet the ever-changing NERC standards as this takes out the guesswork when it comes to compliance and reliability.

NERC Reliability Standard development began in 2006 when NERC was designated as the Electric Reliability Organization (ERO) as part of the Energy Policy Act of 2005. The ERO is responsible for assessing and maintaining the reliability of the bulk power grid, including analyzing risk and preventing reoccurring issues. To fulfill this responsibility, NERC began enforcing mandatory Reliability Standards that owners, operators, and users of the bulk power grid are required to comply with. These Standards cover multiple aspects of the power grid, such as Critical Infrastructure Protection, Modeling, Operations, and more. Over the years, NERC has developed and revised Reliability Standards to better address compliance issues that arise from large scale and recurring disturbances. Each Standard goes through a formal development process that involves input from various industry stakeholders to ensure that the Standard being developed solves an issue without creating undue burdens. This process is formally documented in the NERC Rules of Procedure.

The development of a Reliability Standard begins with the submittal of a Standard Authorization Request (SAR) form by an industry entity or individual. This form documents the scope and reliability benefit of the proposed Standard. The form must then be approved by the Standards Committee, a group of elected individuals who oversee the development of NERC Reliability Standards. Following a 30-day comment period, the Standards Committee designates a Drafting Team responsible for

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NERC Rules of Procedure (ROP) Changes (cont.)

commenting on the SAR prior to the Standards Committee final approval. Once approved by the Standard Committee, the SAR becomes a drafted Reliability Standard, which must now go through several comment and ballot periods before being submitted by the NERC Board of Trustees to FERC for approval.

On September 15, 2023, NERC filed a petition with FERC that would streamline the process for developing Reliability Standards. Revisions to the NERC Rules of Procedure Section 300 (Reliability Standards Development) and Appendix 3A (Standard Processes Manual) would allow NERC to address urgent and arising reliability needs in a quicker, more direct manner.

As part of the revisions, the NERC Board of Trustees would be granted the ability to direct the development of new Standards rather than relying on the industry or other individuals. Independent members elected by NERC stakeholders and NERC's CEO would now be able to address reliability concerns not being addressed by the industry utilizing NERC's traditional Reliability Standards development process.

NERC's petition was approved by FERC on November 28, 2023. The revisions to the NERC Rules of Procedure became effective immediately upon FERC's approval. Additionally, FERC has requested NERC to submit a compliance filing by May 28, 2025 stating the effectiveness of the revisions to the NERC Rules of Procedure.

With the revisions to the NERC Rules of Procedure in effect, the NERC Board of Trustees will be tasked with submitting SARs with shortened timelines, comment, and ballot periods. These changes will allow NERC to address urgent and novel reliability concerns, such as with inverter-based resources and extreme weather preparedness, with greater agility. The streamlined Standard development process will result in an increase in new Standards, an increase of revisions to existing Standards, and a greater compliance demand across the industry.

The CAMS NERC Team specializes in monitoring the development of new NERC standards and revisions to NERC standards. A CAMS NERC Program has been created to provide CAMS facilities with a compliance program that addresses all NERC Standards. The CAMS NERC Program is maintained to meet every standard following any revisions to the enforceable NERC Standards. Updates to the CAMS NERC Program are also made using lessons learned from NERC audits, as this ensures not only that the program meets NERC requirements but also that the program will be adequate for passing an audit.

The CAMS NERC Team develops site specific versions of the CAMS NERC Program before implementing it at facility. Upon implementation, training on the site-specific CAMS NERC Program is performed to ensure site personnel are aware of how to use the program and how to comply with the applicable NERC standards. As new NERC standards and revisions to NERC standards become more frequent, a site-specific NERC Program with timely updates will become even more pivotal to maintaining compliance and reliability at a NERC Registered facility.

In addition to NERC Standard changes, the CAMS NERC Team is actively monitoring NERC's proposal to expand NERC Registration requirements. If approved, this proposal will be a big change in the power industry.

Solar Power at Griffith Reduces Costs and Benefits Employees

By Derek Furstenwerth, SVP, Environmental Services



Griffith Energy is a 600-megawatt (MW) natural gas-fired combined cycle power plant located near Kingman, Arizona. Griffith is owned by ArcLight Energy Partners Fund VII, L.P.; CAMS provides asset management and operations and maintenance services. In 2023, the Griffith Energy team identified an opportunity to reduce plant operating costs by utilizing a plentiful Arizona resource, while also providing plant employees and their vehicles a break from the same resources: the relentless desert sun. The result was a parking structure for employees that also provides power generation to reduce station service costs.

The project began with the plant's desire for parking structures for employee vehicles. When they realized that equipping the structures with solar panels could help offset utility costs, they knew they were on to something. Griffith worked with ArcLight and CAMS corporate teams to develop the idea further. They

evaluated building roofs and other available space to maximize the total area equipped with solar panels. Additionally, they worked through the details of utility and other agreements to tailor the project for Griffith's circumstances

In the end, the team settled on a project that would provide parking structures and cover all plant building rooftops, for a total of 700 kilowatts (kW) of solar generation and would add another 1.3 MW of ground-mounted solar in inactive areas inside the plant. In addition, the project includes 4 electric vehicle (EV) charging stations under the new parking structures. The rooftop solar panels and EV charging stations are complete and in operation. Construction of the 1.3 MW ground-mounted solar project is underway and expected to be completed by June 2024.

In addition to providing a meaningful benefit to plant employees, this project is economically

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Solar Power at Griffith Reduces Costs and Benefits Employees (cont.)



attractive, and was approved on its own merits. Once completed, the project is expected to partially offset auxiliary load at Griffith, which ranges from about 10 MW in winter to 18 MW in summer. This reduction of parasitic load will decrease Griffith's heat rate – already the best in the Desert Southwest power market – by an estimated 0.2%. In addition, it will reduce utility bills by offsetting station service costs by 2 MW when the plant is not running.

The Griffith team continues to lead the way in innovative approaches to plant operations and optimization, demonstrating that sustainability is good for business.

Griffith's parking structure equipped with solar panels and EV charging stations



CAMS NERC Standard by Standard Class

By Brandon Seiler, NERC/FERC Associate



The CAMS Corporate NERC team hosted a one-day Standard by Standard training session on March 6th, 2024, at the CAMS Remote Operations Center in downtown Houston. Multiple sites showed interest and the March class will include personnel from Cos Cob and Devon (Rich Gerdes), Gavin (Roger Bush, Brett Saxon, Joe Warner, Larry Whobrey), Linden CC (Scott Achelpohl), New Haven, Vandolah (Greg Hadley), and CAMS ROC personnel (Michael Carrizalez, Kevin Alexander). The comprehensive training session covered each NERC Reliability Standard in depth with a focus on frequently audited Standards and Standards that are more susceptible to violation. Additionally, upcoming Standards and Standard revisions were discussed since 2024 is a busy year for revised and new Standard implementation.

The main advantages of this style of training are that different sites and personnel offer unique viewpoints, have various types of systems, have methods that may contrast from what another facility does, and have perspectives from multiple different NERC Regions. Site personnel that attend not only benefit from the extensive Standard discussion, but they also receive information and examples on best

practices that can make proving compliance with Standards more efficient. The class size is limited to roughly 10 to allow site specific operations to be discussed in an open and personalized format. This allows for positive habits, new ideas, and compliance cultures to be shared so sites are aware of the similarities and differences between their facilities.

Multiple Standard by Standard sessions are held each year, and the goal is to have site representatives attend at least one training course every two years. This training session included discussions of upcoming changes including EOP-012 implementation, 2024 Standard revisions, and guidance for preparing for the next revision of CIP-003. Attendees also toured the CAMS Remote Operations Center as part of this training session and those with an interest had the opportunity to discuss CAMS ROC services and cyber security packages.

Due to the limited class size and interest in this Standard by Standard training session, we anticipate holding at least two more sessions this year. If you are interested in the next session, please reach out to your CAMS representative to get added to the wait list.

CAMS Fleet Additions



The CAMS Family is growing with the recent addition of several new facilities including the REC Solar renewable portfolio (owned by an ArcLight Capital Partners investment fund); Chalk Point and Dickerson Generation Stations, (owned by Olympus Power); and the Shelby, Gibson, and Tilton facilities (owned by Earthrise Energy).

CHALK POINT AND DICKERSON

CAMS assumed O&M and AM responsibilities of the Chalk Point and Dickerson Generation Stations on January 1, 2024. Both are dual fuel fired facilities located in Maryland. Chalk Point is an 8-unit 1,612 MW facility comprised of two steam turbine units and six simple cycle combustion turbine units. Dickerson is a 2-unit 312 MW facility comprised of two simple cycle combustion turbines.

REC SOLAR

CAMS is providing operations and maintenance (O&M), asset management, accounting, remote monitoring, and related services for REC Solar's renewables portfolio which includes solar and energy storage projects for hundreds of U.S. commercial enterprises, including manufacturers, retailers, schools, universities, and municipalities. We began onboarding employees in fourth quarter 2023 and recently hosted a leadership meeting in Houston to give the new employees an opportunity to meet with other members of the CAMS Energy Transition Services (ETS) team. The REC Solar portfolio increases CAMS' renewable assets under management to over 5.6 gigawatts.

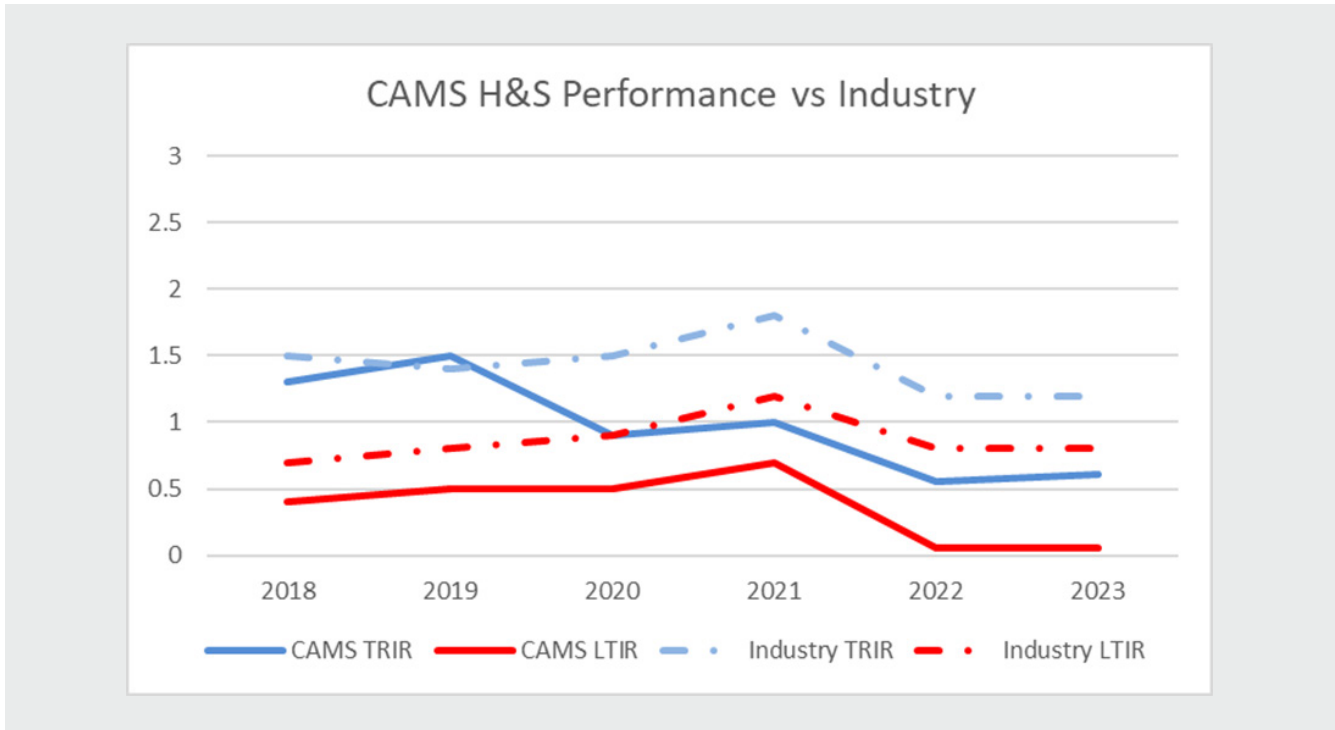


EARTHRISE ENERGY PORTFOLIO

CAMS is partnering with Earthrise Energy to provide asset management and O&M services to their five natural gas peaker plants in Illinois: CAMS assumed O&M responsibilities for Gibson City Energy Center (Gibson), Shelby County Energy Center (Shelby), and Tilton Energy (Tilton) on December 1, 2023. Gibson is a 237 MW facility comprised of two simple cycle combustion turbines. Shelby is a 352 MW facility comprised of eight simple cycle combustion turbines. Tilton is a 184 MW facility comprised of four simple cycle combustion turbines. CAMS was already operating two other Earthrise facilities, Crete Energy Venture (Crete), and Lincoln Generating Facility (Lincoln) at that time. Effective January 1, 2024, CAMS is also responsible for asset management, accounting, and treasury at all five facilities.

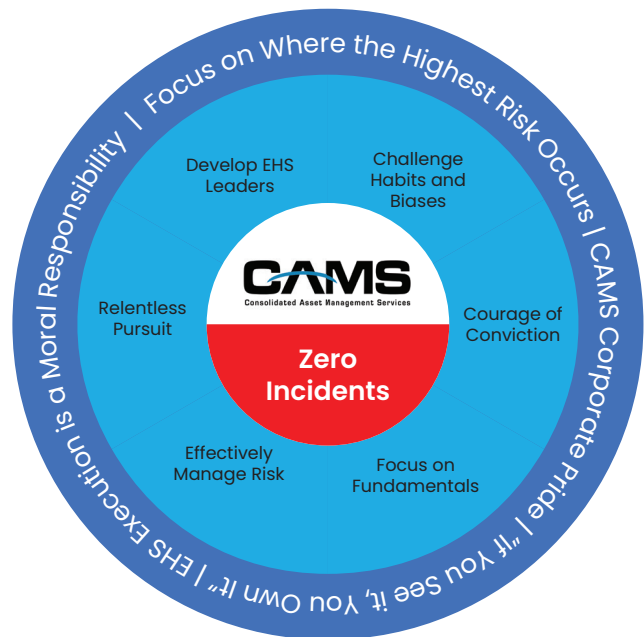
CAMS 2023 World Class EHS Performance: Setting the stage for 2024

By Ben Vodila, VP, Health & Safety



CAMS widely demonstrates our core values of ensuring the Health and Safety of our employees, contractors, customers, and communities and respecting and protecting the environment. Two years ago, we initiated a fleet-wide emphasis on the CAMS EHS Vision, utilizing multiple channels to clearly communicate our values and commitment to achieving world class results. As a result, CAMS has experienced two consecutive years of exemplary Health and Safety performance, with both annual Total Recordable Injury Rates (TRIR) and Lost Time Incident Rates significantly below the industry averages.

CAMS has always achieved annual TRIRs and LTIRs at or below industry averages. We have consistently implemented effective defensive measures for all identifiable hazards in the field and promoted a proactive safety culture. Over the last two years, we have intentionally leveraged the tenets of the CAMS EHS Vision to promote daily focus, sustainable results, and Zero Incidents.

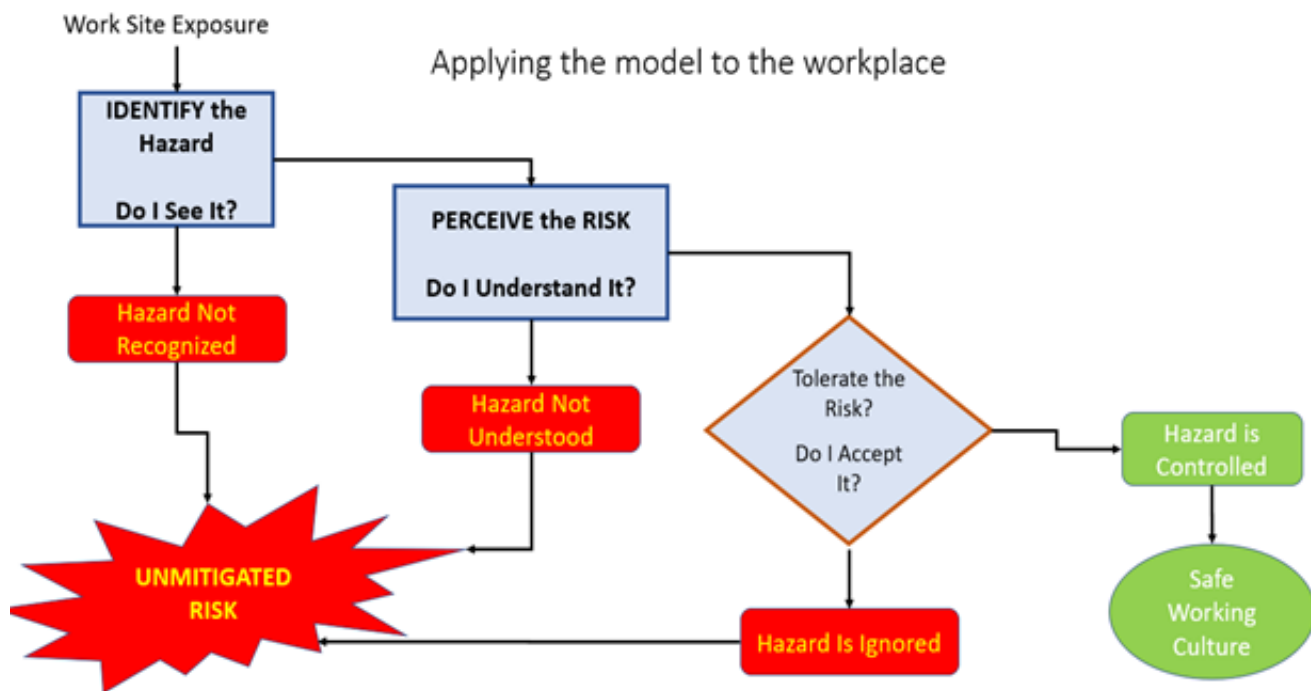


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CAMS 2023 World Class EHS Performance: Setting the stage for 2024 (cont.)

Facilities are encouraged to Focus on Fundamentals of Hazards Identification, and ensure employees understand how to control those hazards in the field. Hazards are discussed during Pre-Job Briefs and field-verified to confirm all risks are properly mitigated. This sets the tone culturally, ensuring that if anyone sees an uncontrolled hazard, they will stop work and put effective protection measures in place.

While focusing on something as simple as this systematic approach to discuss and mitigate hazards may seem inconsequential, the results have compounded our performance significantly. In 2023, CAMS maintained a TRIR 50% below industry average, and our LTIR of 0.06 is 90% below industry average. We thank all CAMS employees for their efforts and improved performance in 2023.



Path Forward

We are truly grateful for the collaborative effort and seek to provide World Class support to all our locations in 2024 and beyond. We will continue to integrate the CAMS EHS Vision in all aspects of our corporate safety programs, including new initiatives related to EHS leadership development and the use of technology to increase EHS performance and efficiency. Stay tuned for more news and updates from the corporate Health & Safety and Environmental Teams.

If you have any questions or concerns about expectations or the CAMS EHS Vision, please contact us at safety@camstex.com, or contact Vice President of Health & Safety - Ben Vodila (bvodila@camstex.com) or Vice President of Environmental - Derek Furstenwerth (dfurstenwerth@camstex.com).

MATS Updates

By Patrick Yough, Senior Environmental Associate



On February 6, 2024, the US Environmental Protection Agency (EPA) held an update call to discuss the changes required for first quarter 2024 reporting for Mercury and Air Toxics Rule (MATS) affected sources. This update will only affect the Limited Use oil units operated by CAMS, specifically Middletown Units 2-4, Montville Units 5 and 6, New Haven Unit 1, and Oswego Units 5 and 6.

Mid-March 2024 updates include the following changes:

1. General ECMPS 1.0 Update
2. Changes to the MATS PDF Submit module to accept new quarterly ancillary XML files, such as the new quarterly reports that were formerly submitted in PDF format semi-annually and additional QA test requirements.

Beginning on January 1, 2024, the former semiannual compliance report must now be submitted quarterly in an XML format. In other words, in 2024, these reports must be submitted quarterly, starting with the first calendar quarter.

These reports are limited in scope, primarily providing two critical pieces of information to EPA and state agencies:

- Fuel usage to demonstrate operations below the 8% annual capacity factor threshold to be considered a Limited Use unit and
- The dates of the most recent boiler tune-up.

The form currently used by the affected CAMS-operated facilities was developed by prior owners when the MATS rule was first issued. While this format can be converted to an XML document, many formatting issues exist due to the number of graphics boxes, etc. CAMS Environmental Services is working with Agora Consulting to develop XML templates for numerous MATS-related filings. We intend to work with Agora to create a new Excel-based template that can be easily converted to XML. It will also produce a PDF copy for submittal to state agencies.

If you have any questions about the MATS rule reporting requirements, or the development of the forms please contact Pat Yough at pyough@camsops.com.



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 the Employee Handbook, which is available for download from Fuse at My Company->Documents.

EHSR Summit – Plan to Meet Us in Houston

The 2024 CAMS Environmental, Health & Safety, and Regulatory Summit will be held at the Whitehall in Houston, TX, from June 4 through June 6. The schedule includes NERC on June 4, Environmental on June 5, and Health & Safety on June 6. The target audience for this event is plant managers, NERC contacts, EHS contacts, and operations and asset management leadership. Please email Mona Johnson at mjohnson@camstex.com for more information.





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