

Received via electronic mail on 4 September 2017

Dear DOE,

In deference to its call for comments, the SNAP Group supports the Government and DOE's aspirations for a comprehensive and integrated Energy Resiliency Plan as embodied in the Proposed Department Circular re: *Adoption of Resiliency Planning and Program in the Energy Industry to Mitigate Adverse Effects Brought About by Disasters*.

As good corporate citizens and energy industry participants, SN Aboitiz Power-Magat, Inc. (SNAP-MI) and SN Aboitiz Power-Benguet, Inc. (SNAP-BI), which owns and operates the 380MW Magat Hydro-Electric Power Plant (HEPP), 105MW Ambuklao HEPP, and 140MW Binga HEPP, have ready and existing plans to protect its Power Assets, the Non-Power Components, i.e., Dams, Spillways, Spillway Gates etc. owned by the Government, and the communities inhabiting the environs including farmers-beneficiaries.

Recognizing the vital role of the Magat, Ambuklao and Binga HEPPs in nation-building by contributing to industry growth, agricultural self-sufficiency, environmental management, disaster mitigation and community protection, the SNAP-MI and SNAP-BI have the following in place:

Power Components Protection:

1. **Annual Preventive Maintenance Program** (re: Safe and Reliable Operations of the Magat, Ambuklao and Binga HEPPs)

Non-Power Components

Protection (in collaboration with NIA, NPC, PSALM and PAGASA):

2. **Operations and Maintenance Manual/ Operations, Maintenance and Safety Manual**
3. **Flood Operation Rule**
4. **Dam Discharge Protocol**
5. **Dam Discharge Warning Manual**

Downstream Communities

Protection (in collaboration with POs, LGUs, Municipal, Provincial and National Disaster Risk Reduction and Management Councils, NIA, NPC, PSALM and PAGASA)

6. **Emergency Action/Evacuation Plan**

Business Continuity Protection (SNAP Group and Affiliates):

7. **Business Continuity Procedures**
 - a. **SNAP-MI Incident Management and Business Recovery Plan**
 - b. **SNAP-BI Incident Management and Business Recovery Plan**

Once the DOE Circular becomes effective, the SNAP Group will submit the required **Resiliency Compliance Plan** for the Magat, Ambuklao and Binga HEPPs.

Regards,
Manny

Emmanuel G. Lopez
VP-Chief Technology Officer

SN ABOITIZ POWER GROUP
T: (+632) 818 9101 to 02 loc. 829
M: (+63) 999 885 9294
www.snaboitiz.com