NORTHWEST POWER POOL

Energy Emergency Plan

Revised August 2017

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Northwest Power Pool

Energy Emergency Plan

I. BACKGROUND

Entities responsible for operating the bulk electric system within the Northwest Power Pool (NWPP) area have dealt with severe weather conditions and anticipated energy and capacity shortfall many times over the last few decades. During these times, the Northwest electric industry's expertise, communication, coordination, and cooperation are unique and have served this area and its consumers well.

The elements of the Northwest's plan to handle energy emergencies are identified within this document. The Energy Emergency Plan (EEP) incorporates or accommodates the following:

- U.S. Federal Energy Regulatory Commission regulations restrict the ways in which the various elements of our industry may communicate.
- The Peak Reliability Reliability Coordinator (RC) is staffed to increase the vision, awareness, and effectiveness of balancing authority operators, especially during times of duress.
- Reliability Standards and procedures have been adopted by North American Electric Reliability Corporation (NERC) to mitigate and communicate reliability problems, including "Energy Emergencies".

The EEP is processed through the Energy Response Team (ERT). The participants are identified in Section VII. The EEP is a living document and will be revised periodically.

II. PURPOSE

The overarching purpose of the EEP is to increase the area's ability to avoid a power emergency or longer-term adequacy problem by promoting area coordination and communications. The EEP is aimed at promoting actions, in advance, to avoid potential short-term emergencies and longer-term energy adequacy problems in the NWPP area. These actions are targeted to alleviate the need to declare a NERC Energy Emergency Alerts1, 2, or 3 as defined in NERC Reliability Standard EOP-011-1 (Attachment 1). The EEP is designed to be invoked when the several balancing authorities have a high degree of confidence that a future short-term power emergency or a long-term energy adequacy problem would adversely affect reliability within the NWPP area.

The EEP is not intended to supplant any entity's authority, but rather it provides the framework for how the utilities, governmental agencies, and other entities will work together should an emergency situation be anticipated as a result of severe weather conditions and/or unexpected outages of transmission or generating facilities that impact load-resource balance. The EEP focuses on area actions and is intended to work with and

complement current governmental regulations and policies in place for individual balancing authorities and load serving entities.

The intended audience for the EEP is operating entities, near-term planners, and policy makers in the electric power industry as well as the area's governments. It provides objectively defined criteria for communicating emergency warnings and warnings of longer-term area energy adequacy problems within the area that are based on analysis of the load and resource situation. The EEP identifies generic area actions when these warnings are declared, describes the roles and responsibilities of the parties involved, and lays out a communication plan for keeping all stakeholders informed throughout the potential crisis.

It is expected that individual entities will use the EEP as a procedural framework for identifying the individual actions they will be able to take when either warnings of power emergencies or warnings of energy adequacy problems are declared.

III. POTENTIAL ACTIONS OF THE EMERGENCY PLAN

In accordance with the EEP, following the declaration of an Area Warning, entities in the area may take a range of actions to avoid declaration of an official NERC Energy Emergency Alert level within the area. The following types of actions (not inclusive) may be taken:

- Discretionary exports halted.
- Scheduled maintenance of generation or transmission facilities may be shifted.
- Transmission operators may explore additional options for increasing imports.
- Resources may be operated beyond the “soft” limits to full nameplate capability.
- Assistance from outside the area may be arranged.
- Options to interrupt load under applicable contracts may be exercised including load reductions being purchased from customers.

IV. KEY PLAN COMPONENTS AND DEFINITIONS

- ***NERC Energy Emergency Alerts***

  The EEP is designed to work in tandem with *and in advance of* NERC Energy Emergency Alerts as described in the NERC Reliability Standard EOP-011-1 (Attachment 1). The EEP includes emergency warnings of ***potential*** NERC-defined Energy Emergency Alerts 1, 2, and 3. NERC defines Energy Emergency as a condition when a Load-Serving Entity has exhausted all other options and can no longer provide its customers’ expected energy requirements. This assumes that a capacity deficiency will manifest itself as an energy emergency.

- NERC Energy Emergency Alert 1 (EEA 1) – All available generation resources in use – is possible if a Balancing Authority's forecasts anticipate conditions where all available resources are committed to meet firm Load, firm transactions, and reserve commitments; and, there is concern about sustaining its required Contingency Reserves AND when Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.

- NERC Energy Emergency Alert 2 (EEA 2) – Load management procedures in effect – is possible if the Balancing Authority is no longer able to provide its expected energy requirements and is an energy deficient Balancing Authority, has implemented its Operating Plan(s) to mitigate Emergencies, and is still able to maintain minimum Contingency Reserve Requirements.

- NERC Energy Emergency Alert 3 (EEA 3) – firm load interruption is imminent or in progress – is possible if a Balancing Authority is unable to meet minimum Contingency Reserve requirements.

➢ ***Preparatory (or Normal) Condition***

This is business as usual. Energy merchants and system operators continue to monitor for abnormal events.

➢ ***Energy Response Team***

Participants of the Energy Response Team (ERT) will be key individuals who are permitted access to the operational information necessary to evaluate the area situation and who have the authority to make and implement operational decisions. The Energy Response Team also may include representatives from governmental agencies, the Reliability Coordinator, the ERT Communications Coordinator, and NWPP staff members.

The Energy Response Team will be responsible for:

1) Determining the magnitude and duration of a potential emergency or longer-term energy adequacy problem,
2) Assisting the communications coordinator to formulate the content of any relevant public message related to the potential emergency or problem, and
3) Deciding whether to recommend that the ERT Coordinator post a Warning of a potential Area Power Emergency or a Warning of a potential Area Energy Adequacy Problem as defined below.

The Energy Response Team will periodically assess whether it should include additional participants, either for a specific incident or on an ongoing basis.

Participants of the Energy Response Team will comply with FERC Standards of Conduct (Order 889, encoded as 18CFR Part 37). Participants will obtain relevant information on non-transmission factors with those engaged in wholesale merchant

functions in order to bring information to the discussions, and will determine how and what information to communicate back to the merchant functions in a manner that complies with the FERC Standards of Conduct.

There may be circumstances under which the Standards of Conduct can be suspended. Any discussion during such a suspension must address the emergency and topics must be specifically related to alleviating the emergency.

Individual FERC-jurisdictional entities will determine for themselves whether circumstances make it necessary for them to suspend Standards of Conduct within their own organizations and will be responsible for OASIS posting and reporting to FERC as required by the Standards of Conduct.

- ***ERT Coordinator***

The NWPP corporate staff serves as ERT Coordinator for the Energy Response Team (ERT). The ERT Coordinator shall:

1) Facilitate meetings,
2) Gather relevant data needed by the Energy Response Team, and
3) Be responsible for logistical support to the Energy Response Team.

As needed, the ERT Coordinator shall establish procedural rules and/or contractual agreements to keep confidential any information provided by Energy Response Team members that is identified as being sensitive.

- ***ERT Communications Coordinator***

The ERT Communications Coordinator provides communications and public relations support for the Energy Response Team. The ERT Communications Coordinator's duties include:

1) Facilitating meetings of the communications support team,
2) Acting as a liaison between the communications support team and the Energy Response Team,
3) Representing the Energy Response Team in public communications and the media, and
4) Providing talking points and other communication aids to the Energy Response Team and area policy-makers.

The ERT Communications Coordinator position is filled by one of the Energy Response Team member organizations.

- ***Area Warnings***

Area Warnings are warnings issued by the ERT and posted by the ERT Coordinator. They are intended to inform the public and initiate voluntary actions within the area. Area Warnings are either:

1) Warning of a ***potential*** Area Power Emergency, or
2) Warning of a ***potential*** Area Energy Adequacy Problem.

- ***Warning of a potential Area Power Emergency***

  The ERT Coordinator will be responsible for posting the Warning of a ***potential*** Area Power Emergency. This warning will indicate the severity of the situation by identifying the potential of a NERC Energy Emergency Alerts 1, 2 or 3 being issued. This decision will be based on the load and resource analysis provided to the Energy Response Team and their recommendation. A Warning of a ***potential*** Area Power Emergency will apply to situations where the area is projected to be short of power for the next three to ten days. Actions will be taken, as identified above, to avoid declaration of a NERC Energy Emergency Alert.

- ***Warning of a potential Area Energy Adequacy Problem***

  The ERT Coordinator will post a Warning of a ***potential*** Area Energy Adequacy Problem based on the load and resource analysis provided to the Energy Response Team and their recommendation. This warning will indicate the severity and the possible duration of the problem. This warning will be declared if the area is forecasting that energy supplies from within the area, combined with net imports into the area, are inadequate to meet firm load for some period of time (two-week to monthly timeframe) within the current operating year (August through July).

- ***Termination of Area Warnings***

  This ends a Warning of a ***potential*** Area Power Emergency or Warning of a ***potential*** Area Energy Adequacy Problem. The ERT Coordinator announces that the Area Warning has ended when the ERT decides that forecasts show adequate energy to meet forecast demands including reserve.

V. PROCEDURES

The following bullets provide a general description of the overall procedure as the area moves from business as usual to an anticipated emergency situation or adequacy problem. It defines the roles and responsibilities of various parties, including required analysis and triggers for declaring a Warning of a ***potential*** Area Power Emergency or a Warning of a ***potential*** Area Energy Adequacy Problem. A flowchart diagram depicting the Energy Response Team process is shown in Diagram 1. Balancing authority operator and load serving entity actions will be guided by NERC Reliability Standard EOP-011-1 as well as those actions defined below. The roles and responsibilities of the governmental agencies and communicators are indicated below. Additional details are also included in the Public Communication Plan found in Attachment 2.

- ***Preparatory (or Normal) Condition***

  a. Balancing Authority operators serve load and comply with all NERC, WECC, and NWPP reliability standards and criteria.

b. Establish a secure repository for critical operating data; operating entities will establish analysis framework and provide baseline data, subject to confidential treatment.

c. Continue normal forecasting and regularly update load and resource projections.

d. Identify individuals to participate on Energy Response Team and identify the ERT Communications Coordinator.

e. Conduct an area education campaign focused on wise energy use.

f. Complete contact lists for utility executives, area policy makers, media and other appropriate parties (e.g. interest groups).

g. The ERT Communications Coordinator will work with the Energy Response Team and entities to determine designated spokespersons and will set up a communications support team.

h. Release a media message that explains the need for and purpose of the EEP, and conduct media and editorial board briefings to set context (status of the system) and answer questions.

- ***Anticipation of Area Warning***

a. Ongoing operational planning and forecasting by all entities may foresee a need to consider an Area Warning. If, as a result of operational studies or credible weather forecasts, operational planners forecast a near-term power emergency (one week or less) or a longer-term (two-week or monthly) shortfall in meeting load, they will contact the ERT Coordinator.

b. Utility executives and governmental policy makers will be notified of the possibility that a warning may occur. Media will also be notified as appropriate.

c. Operating entities will provide additional data as warranted by the situation (through the secure repository and subject to confidential treatment).

- ***Northwest Power Pool Corporate Staff Review***

a. The NWPP corporate staff will announce that they are reviewing area analysis and ask all entities to initiate intensive, focused forecasting of loads, available generation, firm import/export plans, and transmission capability.

b. The NWPP corporate staff will convene a small technical workgroup of balancing authorities to evaluate and prepare technical information for the use by the entire Energy Response Team. This group will evaluate the nature of the problem (short-term, long-term, weather-related, hardware-related, etc.) and determine what portion of the area's load it believes cannot be met by resources within the area.

c. The NWPP corporate staff will gather and aggregate information from area entities to confirm the concern.

d. Based on the results of this workgroup effort the ERT Coordinator will convene conference calls of the Energy Response Team as appropriate.

e. In anticipation of a warning condition, entities will prepare by taking actions within their contractual rights to improve their expected load-resource balance. This could be reducing demand, increasing imports and/or increasing generating capability.

- ***Energy Response Team Action***

a. The ERT Coordinator will host conference calls of the Energy Response Team to clarify information, evaluate the situation, and identify actions to avoid declaring an Area Warning. It is anticipated that the convening of the Energy Response Team will be triggered by a resource or transmission outage event, a forecast of a significant departure from normal operations (such as an expected cold-snap) or forecasted long-term changes in resource availability (such as a forecasted critical water situation)

b. The Energy Response Team will conduct its communications so that any discussions relating to transmission comply with FERC Standards of Conduct. The ERT Coordinator will, as needed, convene a call of the Energy Response Team members who may freely discuss transmission information (under FERC Standards of Conduct) to assess the area's energy import capability and determine if there is sufficient energy import capability to meet the anticipated load requirements. As an alternative and time permitting, the entire Energy Response Team may reconvene once the relevant transmission information has been posted on OASIS (confining transmission-related discussions to what has been posted).

c. The Energy Response Team will determine the magnitude and duration of the potential emergency or longer-term energy adequacy problem and recommend to the ERT Coordinator that an Area Warning be posted (as described below). The ERT Coordinator will post an Area Warning based on the consensus opinion of the Energy Response Team. In a fast moving situation, the ERT Coordinator may post an Area Warning without the Energy Response Team; the NWPP Operating Committee will be informed of this action.

d. During an Area Warning, the Energy Response Team and others, through regularly scheduled conference calls, will monitor the situation and evaluate what actions can be taken to alleviate the emergency. The conference calls will allow balancing authority operators and load serving entities to determine if all actions for alleviating the problem have been exhausted. There may be situations where stakeholders have not taken every measure expected when a Warning is issued.

e. The ERT Communications Coordinator will work with the Energy Response Team to develop the content of any public messages that may be necessary. Depending on the severity of the problem and time constraints, the communications coordinator will, as appropriate, work with area policy makers to formulate a coordinated and consistent public message.

- ***Area Warning Posted***

  a. If the Energy Response Team determines an Area Warning is warranted it will advise the ERT Coordinator accordingly. Based on the situation, the ERT Coordinator will post either a Warning of a ***potential*** Area Power Emergency or a Warning of a ***potential*** Area Energy Adequacy problem on the NWPP web site and through the Peak RMT as appropriate. (Note: this provides official, nondiscriminatory public notice of the condition and facilitates industry-wide response to alleviate the shortfall.) The Warning posting may include specific details (e.g. magnitude, location, etc.) of the anticipated problems. Warnings of Area Power Emergencies and Area Energy Adequacy Problems do not need to be issued sequentially.

  b. The ERT Coordinator will continue to convene conference calls of the Energy Response Team and work as needed with others in the WECC area until the Area Warning has been terminated. The Energy Response Team could investigate the feasibility of regularly scheduled (hourly, daily, weekly) conference calls through an open bridge for all interested parties to hear updated forecasts, conditions and predictions of weather, loads, resources, etc.

  c. Media/communications personnel, in coordination with the NWPP, will keep top management personnel; government policy makers; and the public informed as to important developments regarding the status of the electrical system. The ERT Communications Coordinator will participate in any NWPP conference calls and will develop and deliver warning messages. See the Public Communication Plan (Attachment 2) for anticipated media messages and communication actions that may occur for each warning level.

  d. Energy Response Team participants will work with governmental representatives to develop ideas about actions that could be taken in each situation.

  e. Balancing Authority operators implement actions assumed in the forecast for declaring an Area Warning.

     - Take all possible economic and discretionary actions, including curtailing discretionary wholesale energy sales.

     - Take extraordinary actions, including but not limited to:

       - Public appeals to reduce demand,
       - Voltage reduction,
       - Demand-side management,
       - Utility load conservation measures, and
       - Interruption of non-firm end use loads in accordance with applicable contracts.

- ***Termination of Area Warning***

  a. When the Energy Response Team and others have determined that the condition which triggered the Area Warning no longer exists and that there are no expectations of other similar types of Area Warnings being issued in the

next few weeks, the ERT Coordinator will announce the Area Warning terminated.

b. Media/communications personnel will disseminate the message and will assist the parties in providing appropriate recognition to those who contributed to averting or mitigating the emergency.

c. One or more Balancing Authority operators may still be deficient and in NERC Alert status as defined in NERC Reliability Standard EOP-011-1 (See Attachment 1). Therefore, it is possible that a specific entity may maintain its Energy Emergency Alert status after the Area Warning has been terminated.

d. Any individual FERC-jurisdictional entity that suspends its Standards of Conduct during an emergency is required to report to FERC within 24 hours.

VI. LESSONS LEARNED

If an Area Warning is triggered, the NWPP with the cooperation of major stakeholders will prepare a report that:

- Summarizes the events that triggered the warning or alert;
- Identifies potential problem areas;
- Provides recommendations for future improvements.

VII. ENERGY RESPONSE TEAM PARTICIPANTS

OPERATING COMMITTEE

Balancing Authorities

Alberta Electric System Operator (AESO)
Avista Corp (AVA)
Balancing Authority of Northern California (BANC)
Bonneville Power Administration (BPAT)
British Columbia Hydro and Power Authority (BCHA)
Chelan County Public Utility District (CHPD)
Douglas County Public Utility District (DOPD)
Grant County Public Utility District (GCPD)
Gridforce Energy Management, LLC (GRID)
Idaho Power Company (IPCO)
NaturEner USA, LLC (GWA and WWA)
NV Energy (NEVP)
NorthWestern Energy (NWMT)
PacifiCorp (PACE and PACW)
Portland General Electric Company (PGE)
Puget Sound Energy (PSEI)
Seattle City Light (SCL)
Tacoma Power (TPWR)
Turlock Irrigation District (TID)
Western Area Power Administration – Upper Great Plains (WAUW)

Non-Balancing Authorities

Avangrid Renewables, LLC
Calpine Corporation
FortisBC
Iberdrola Renewables
Powerex Corporation
Snohomish County Public Utility District
U. S. Bureau of Reclamation

OTHERS (by invitation)

Affiliates, Marketers, Independent Power Producers, etc.
Peak Reliability
ERT Communications Coordinator
Governmental Agencies
Northwest Gas Association
Northwest Power and Conservation Council
Northwest Power Pool Corporation staff
U. S. Corps of Engineers

1) Balancing authority expects a Generation, Load or Transmission Problem
2) Balancing authorities discuss problem – (OASIS posting may be needed)
3) If a problem exists – ERT process initiated by balancing authority
<go to **START**>

DIAGRAM 1

4) Balancing authority (BA) informs ERT triage team.

START

BA sees a problem and alerts the NWPP staff

NWPP calls small group of technical experts to evaluate potential problem ("Triage" group)

Is their additional FERC SOC-protected data needed?

Is there verification that the ERT should be called?

NO

No call for ERT is made.

YES

NWPP calls BA Operators to obtain data and have data posted on Oasis

Note – the composition of the small triage group will depend on the type of problem being evaluated (short-term capacity vs. longer-term energy adequacy)

Pre-ERT Process

ERT Process

ERT Coordinator initiates an ERT call, ERT evaluates the analysis done by the "Triage" group.

5) ERT triage team decision.

Is their justification to call for a warning?

NO

No Warning is given.

YES

ERT prepares a brief description of the "situation" for the Communications Team.

Is it a short-term emergency or long-term energy adequacy?

Short-term

ERT Coordinator issues Warning of a potential Area Power

Long-term

ERT Coordinator issues Warning of a potential Area Energy Adequacy Problem

A. Introduction

1. **Title:** **Emergency Operations**

2. **Number:** **EOP-011-1**

3. **Purpose:** To address the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed Operating Plan(s) to mitigate operating Emergencies, and that those plans are coordinated within a Reliability Coordinator Area.

4. **Applicability:**

   4.1. Functional Entities:

   4.1.1 Balancing Authority

   4.1.2 Reliability Coordinator

   4.1.3 Transmission Operator

5. **Effective Date:**

   See *Implementation Plan for EOP-011-1*

6. **Background:**

   EOP-011-1 consolidates requirements from three standards: EOP-001-2.1b, EOP-002-3.1, and EOP-003-2.

   The standard streamlines the requirements for Emergency operations for the Bulk Electric System into a clear and concise standard that is organized by Functional Entity. In addition, the revisions clarify the critical requirements for Emergency Operations, while ensuring strong communication and coordination across the Functional Entities.

B. Requirements and Measures

R1. Each Transmission Operator shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include the following, as applicable: *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning]*

1.1. Roles and responsibilities for activating the Operating Plan(s);

1.2. Processes to prepare for and mitigate Emergencies including:

1.2.1. Notification to its Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency;

1.2.2. Cancellation or recall of Transmission and generation outages;

1.2.3. Transmission system reconfiguration;

1.2.4. Redispatch of generation request;

1.2.5. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and

1.2.6. Reliability impacts of extreme weather conditions.

M1. Each Transmission Operator will have a dated Operating Plan(s) developed in accordance with Requirement R1 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R1.

R2. Each Balancing Authority shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable: *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations, Operations Planning, Long-term Planning]*

2.1. Roles and responsibilities for activating the Operating Plan(s);

2.2. Processes to prepare for and mitigate Emergencies including:

2.2.1. Notification to its Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency;

2.2.2. Requesting an Energy Emergency Alert, per Attachment 1;

2.2.3. Managing generating resources in its Balancing Authority Area to address:

2.2.3.1. capability and availability;

2.2.3.2. fuel supply and inventory concerns;

2.2.3.3. fuel switching capabilities; and

2.2.3.4. environmental constraints.

2.2.4. Public appeals for voluntary Load reductions;

2.2.5. Requests to government agencies to implement their programs to achieve necessary energy reductions;

2.2.6. Reduction of internal utility energy use;

2.2.7. Use of Interruptible Load, curtailable Load and demand response;

2.2.8. Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and

2.2.9. Reliability impacts of extreme weather conditions.

M2. Each Balancing Authority will have a dated Operating Plan(s) developed in accordance with Requirement R2 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R2.

R3. The Reliability Coordinator shall review the Operating Plan(s) to mitigate operating Emergencies submitted by a Transmission Operator or a Balancing Authority regarding any reliability risks that are identified between Operating Plans. *[Violation Risk Factor: High] [Time Horizon: Operations Planning]*

3.1. Within 30 calendar days of receipt, the Reliability Coordinator shall:

3.1.1. Review each submitted Operating Plan(s) on the basis of compatibility and inter-dependency with other Balancing Authorities' and Transmission Operators' Operating Plans;

3.1.2. Review each submitted Operating Plan(s) for coordination to avoid risk to Wide Area reliability; and

3.1.3. Notify each Balancing Authority and Transmission Operator of the results of its review, specifying any time frame for resubmittal of its Operating Plan(s) if revisions are identified.

M3. The Reliability Coordinator will have documentation, such as dated e-mails or other correspondences that it reviewed Transmission Operator and Balancing Authority Operating Plans within 30 calendar days of submittal in accordance with Requirement R3.

R4. Each Transmission Operator and Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R3 and resubmit its Operating Plan(s) to its Reliability Coordinator within a time period specified by its Reliability Coordinator. *[Violation Risk Factor: High] [Time Horizon: Operation Planning]*

M4. The Transmission Operator and Balancing Authority will have documentation, such as dated emails or other correspondence, with an Operating Plan(s) version history showing that it responded and updated the Operating Plan(s) within the timeframe identified by its Reliability Coordinator in accordance with Requirement R4.

R5. Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority within its Reliability Coordinator Area shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators. *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*

M5. Each Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator within its Reliability Coordinator Area will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that will be used to determine if the Reliability Coordinator communicated, in accordance with Requirement R5, with other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators .

R6. Each Reliability Coordinator that has a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area shall declare an Energy Emergency Alert, as detailed in Attachment 1. *[Violation Risk Factor: High] [Time Horizon: Real-Time Operations]*

M6. Each Reliability Coordinator, with a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that it declared an Energy Emergency Alert, as detailed in Attachment 1, in accordance with Requirement R6.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Evidence Retention

The Balancing Authority, Reliability Coordinator, and Transmission Operator shall keep data or evidence to show compliance, as identified below, unless directed by its Compliance Enforcement Authority (CEA) to retain specific evidence for a longer period of time as part of an investigation. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- The Transmission Operator shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R1 and R4and Measures M1 and M4.
- The Balancing Authority shall retain the current Operating Plan(s), evidence of review or revision history plus each version issued since the last audit and evidence of compliance since the last audit for Requirements R2 and R4, and Measures M2 and M4.
- The Reliability Coordinator shall maintain evidence of compliance since the last audit for Requirements R3, R5, and R6 and Measures M3, M5, and M6.

If a Balancing Authority, Reliability Coordinator or Transmission Operator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.3. Compliance Monitoring and Assessment Processes:

As defined in the NERC Rules of Procedure; "Compliance Monitoring and Assessment Processes" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.

1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Real-time Operations, Operations Planning, Long-term Planning	High		The Transmission Operator developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to maintain it.	The Transmission Operator developed an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to have it reviewed by its Reliability Coordinator.	The Transmission Operator failed to develop an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. OR The Transmission Operator developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission s Operator Area but failed to implement it.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R2	Real-time Operations, Operations Planning, Long-term Planning	High	N/A	The Balancing Authority developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to maintain it.	The Balancing Authority developed an Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to have it reviewed by its Reliability Coordinator.	The Balancing Authority failed to develop an Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area. OR The Balancing Authority developed a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies within its Balancing Authority Area but failed to implement it.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R3	Operations Planning	High	N/A	N/A	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator within 30 calendar days.	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator.
R4	Operations Planning	High	N/A	N/A	The Transmission Operator or Balancing Authority failed to update and resubmit tis Operating Plan(s) to its Reliability Coordinator within the timeframe specified by its Reliability Coordinator.	The Transmission Operator or Balancing Authority failed to update and resubmit its Operating Plan(s) to its Reliability Coordinator.
R5	Real-time Operations	High	N/A	N/A	The Reliability Coordinator that received an Emergency	The Reliability Coordinator that received an Emergency

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
					notification from a Transmission Operator or Balancing Authority did notify neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators but failed to notify within 30 minutes from the time of receiving notification.	notification from a Transmission Operator or Balancing Authority failed to notify neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators.
R6	Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area failed to declare an Energy Emergency Alert.

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	November 13, 2014	Adopted by Board of Trustees	Merged EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.
1	November 19, 2015	FERC approved EOP-011-1. Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000. Order No. 818	

Attachment 1-EOP-011-1
Energy Emergency Alerts

Introduction

This Attachment provides the process and descriptions of the levels used by the Reliability Coordinator in which it communicates the condition of a Balancing Authority which is experiencing an Energy Emergency.

A. General Responsibilities

1. **Initiation by Reliability Coordinator.** An Energy Emergency Alert (EEA) may be initiated only by a Reliability Coordinator at 1) the Reliability Coordinator's own request, or 2) upon the request of an energy deficient Balancing Authority.
2. **Notification**. A Reliability Coordinator who declares an EEA shall notify all Balancing Authorities and Transmission Operators in its Reliability Coordinator Area. The Reliability Coordinator shall also notify all neighboring Reliability Coordinators.

B. EEA Levels

Introduction
To ensure that all Reliability Coordinators clearly understand potential and actual Energy Emergencies in the Interconnection, NERC has established three levels of EEAs. The Reliability Coordinators will use these terms when communicating Energy Emergencies to each other. An EEA is an Emergency procedure, not a daily operating practice, and is not intended as an alternative to compliance with NERC Reliability Standards.

The Reliability Coordinator may declare whatever alert level is necessary, and need not proceed through the alerts sequentially.

1. EEA 1 — All available generation resources in use.

Circumstances:

- The Balancing Authority is experiencing conditions where all available generation resources are committed to meet firm Load, firm transactions, and reserve commitments, and is concerned about sustaining its required Contingency Reserves.
- Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.

2. EEA 2 — Load management procedures in effect.

Circumstances:

- The Balancing Authority is no longer able to provide its expected energy requirements and is an energy deficient Balancing Authority.
- An energy deficient Balancing Authority has implemented its Operating Plan(s) to mitigate Emergencies.

- An energy deficient Balancing Authority is still able to maintain minimum Contingency Reserve requirements.

During EEA 2, Reliability Coordinators and energy deficient Balancing Authorities have the following responsibilities:

2.1 Notifying other Balancing Authorities **and market participants**. The energy deficient Balancing Authority shall communicate its needs to other Balancing Authorities and market participants. Upon request from the energy deficient Balancing Authority, the respective Reliability Coordinator shall post the declaration of the alert level, along with the name of the energy deficient Balancing Authority on the RCIS website.

2.2 Declaration period. The energy deficient Balancing Authority shall update its Reliability Coordinator of the situation at a minimum of every hour until the EEA 2 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the RCIS website as changes occur and pass this information on to the neighboring Reliability Coordinators, Balancing Authorities and Transmission Operators**.**

2.3 Sharing information on resource availability. Other Reliability Coordinators of Balancing Authorities with available resources shall coordinate, as appropriate, with the Reliability Coordinator that has an energy deficient Balancing Authority.

2.4 Evaluating and mitigating Transmission limitations. The Reliability Coordinator shall review Transmission outages and work with the Transmission Operator(s) to see if it's possible to return to service any Transmission Elements that may relieve the loading on System Operating Limits (SOLs) or Interconnection Reliability Operating Limits (IROLs).

2.5 Requesting Balancing Authority actions. Before requesting an EEA 3, the energy deficient Balancing Authority must make use of all available resources; this includes, but is not limited to:

2.5.1 All available generation units are on line. All generation capable of being on line in the time frame of the Emergency is on line.

2.5.2 Demand-Side Management. Activate Demand-Side Management within provisions of any applicable agreements.

3. EEA 3 —Firm Load interruption is imminent or in progress.

Circumstances:

- The energy deficient Balancing Authority is unable to meet minimum Contingency Reserve requirements.

During EEA 3, Reliability Coordinators and Balancing Authorities have the following responsibilities:

3.1 Continue actions from EEA 2. The Reliability Coordinators and the energy deficient Balancing Authority shall continue to take all actions initiated during EEA 2.

3.2 Declaration Period. The energy deficient Balancing Authority shall update its Reliability Coordinator of the situation at a minimum of every hour until the EEA 3 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the RCIS website as changes occur and pass this information on to the neighboring Reliability Coordinators, Balancing Authorities, and Transmission Operators.

3.3 Reevaluating and revising SOLs and IROLs. The Reliability Coordinator shall evaluate the risks of revising SOLs and IROLs for the possibility of delivery of energy to the energy deficient Balancing Authority. Reevaluation of SOLs and IROLs shall be coordinated with other Reliability Coordinators and only with the agreement of the Transmission Operator whose Transmission Owner (TO) equipment would be affected. SOLs and IROLs shall only be revised as long as an EEA 3 condition exists, or as allowed by the Transmission Owner whose equipment is at risk. The following are minimum requirements that must be met before SOLs or IROLs are revised:

3.3.1 Energy deficient Balancing Authority obligations. The energy deficient Balancing Authority, upon notification from its Reliability Coordinator of the situation, it will immediately take whatever actions are necessary to mitigate any undue risk to the Interconnection. These actions may include Load shedding.

3.4 Returning to pre-Emergency conditions. Whenever energy is made available to an energy deficient Balancing Authority such that the Systems can be returned to its pre-Emergency SOLs or IROLs condition, the energy deficient Balancing Authority shall request the Reliability Coordinator to downgrade the alert level.

3.4.1 Notification of other parties. Upon notification from the energy deficient Balancing Authority that an alert has been downgraded, the Reliability Coordinator shall notify the neighboring Reliability Coordinators (via the RCIS), Balancing Authorities and Transmission Operators that its Systems can be returned to its normal limits.

Alert 0 - Termination. When the energy deficient Balancing Authority is able to meet its Load and Operating Reserve requirements, it shall request its Reliability Coordinator to terminate the EEA**.**

0.1 Notification. The Reliability Coordinator shall notify all other Reliability Coordinators via the RCIS of the termination. The Reliability Coordinator shall also notify the neighboring Balancing Authorities and Transmission Operators.

Guidelines and Technical Basis

Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

Rationale for R1:
The EOP SDT examined the recommendation of the EOP Five-Year Review Team (FYRT) and FERC directive to provide guidance on applicable entity responsibility that was included in EOP-001-2.1b. The EOP SDT removed EOP-001-2.1b, Attachment 1, and incorporated it into this standard under the applicable requirements. This also establishes a separate requirement for the Transmission Operator to create an Operating Plan(s) for mitigating operating Emergencies in its Transmission Operator Area.
The Operating Plan(s) can be one plan, or it can be multiple plans.

"Notification to its Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency" was retained. This is a process in the plan(s) that determines when the Transmission Operator must notify its Reliability Coordinator.

To meet the associated measure, an entity would likely provide evidence that such an evaluation was conducted along with an explanation of why any overlap of Loads between manual and automatic load shedding was unavoidable or reasonable.

An Operating Plan(s) is implemented by carrying out its stated actions.

If any Parts of Requirement R1 are not applicable, the Transmission Operator should note "not applicable" in the Operating Plan(s). The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).

With respect to automatic Load shedding schemes that include both UVLS and UFLS, the EOP SDT's intent is to keep manual and automatic Load shed schemes as separate as possible, but realizes that sometimes, due to system design, there will be overlap. The intent in Requirement R1 Part 1.2.5. is to minimize, as much as possible, the use of manual Load shedding which is already armed for automatic Load shedding. The automatic Load shedding schemes are the important backstops against Cascading outages or System collapse. If any entity manually sheds a Load which was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. Each entity should review their automatic Load shedding schemes and coordinate their manual processes so that any overlapping use of Loads is avoided to the extent reasonably possible.

Rationale for R2:
To address the recommendation of the FYRT and the FERC directive to provide guidance on applicable entity responsibility in EOP-001-2.1b, Attachment 1, the EOP SDT removed EOP-001-2.1b, Attachment 1, and incorporated it into this standard under the applicable requirements. EOP-011-1 also establishes a separate requirement for the Balancing Authority to create its Operating Plan(s) to address Capacity and Energy Emergencies.
The Operating Plan(s) can be one plan, or it can be multiple plans.

An Operating Plan(s) is implemented by carrying out its stated actions.

If any Parts of Requirement R2 are not applicable, the Balancing Authority should note "not applicable" in the Operating Plan(s). The EOP SDT recognizes that across the regions, Operating Plan(s) may not include all the elements listed in this requirement due to restrictions, other methods of managing situations, and documents that may already exist that speak to a process that already exists. Therefore, the entity must provide in the plan(s) that the element is not applicable and detail why it is not applicable for the plan(s).

The EOP SDT retained the statement "Operator-controlled manual Load shedding," as it was in the current EOP-003-2 and is consistent with the intent of the EOP SDT.

With respect to automatic Load shedding schemes that include both UVLS and UFLS, the EOP SDT's intent is to keep manual and automatic Load shedding schemes as separate as possible, but realizes that sometimes, due to system design, there will be overlap. The intent in Requirement R2 Part 2.2.8. is to minimize as much as possible the use manual Load shedding which is already armed for automatic Load shedding. The automatic Load shedding schemes are the important backstops against Cascading outages or System collapse. If an entity manually sheds a Load that was included in an automatic scheme, it reduces the effectiveness of that automatic scheme. Each entity should review its automatic Load shedding schemes and coordinate its manual processes so that any overlapping use of Loads is avoided to the extent possible.

The EOP SDT retained Requirement R8 from EOP-002-3.1 and added it to the Parts in Requirement R2.

Rationale for R3:
The SDT agreed with industry comments that the Reliability Coordinator does not need to approve BA and TOP plan(s). The SDT has changed this requirement to remove the approval but still require the RC to review each entity's plan(s), looking specifically for reliability risks. This is consistent with the Reliability Coordinator's role within the Functional Model and meets the FERC directive regarding the RC's involvement in Operating Plan(s) for mitigating Emergencies.

Rationale for Requirement R4:
Requirement R4 supports the coordination of Operating Plans within a Reliability Coordinator Area in order to identify and correct any Wide Area reliability risks. The EOP SDT expects the Reliability Coordinator to make a reasonable request for response time. The time period requested by the Reliability Coordinator to the Transmission Operator and Balancing Authority to update the Operating Plan(s) will depend on the scope and urgency of the requested change.

Rationale for R5

The EOP SDT used the existing requirement in EOP-002-3.1 for the Balancing Authority and added the words "within 30 minutes from the time of receiving notification" to the requirement to communicate the intent that timeliness is important, while balancing the concern that in an Emergency there may be a need to alleviate excessive notifications on Balancing Authorities and Transmission Operators. By adding this time limitation, a measurable standard is set for when the Reliability Coordinator must complete these notifications.

Rationale for Introduction

LSEs were removed from Attachment 1, as an LSE has no Real-time reliability functionality with respect to EEAs.

EOP-002-3.1 Requirement R9 was in place to allow for a Transmission Service Provider to change the priority of a service request, as permitted in its transmission tariff, informing the Reliability Coordinator so that the service would not be curtailed by a TLR; and since the Tagging Specs did not allow profiles to be changed, this was the only method to accomplish it. Under NAESB WEQ E-tag Specification v1811 R3.6.1.3, this has been modified and now the TSP has the ability to change the Transmission priority which, in turn, is reflected in the IDC. This technology change allows for the deletion of Requirement R9 in its entirety. Requirement R9 meets with Criterion A of Paragraph 81 and should be retired.

Rationale for (2) Notification

The EOP SDT deleted the language, "*The Reliability Coordinator shall also notify all other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS). Additionally, conference calls between RCs shall be held as necessary to communicate system conditions. The RC shall also notify the other RCs when the alert has ended*" as duplicative to proposed IRO-014-3 Requirement R1:

R1**.** Each Reliability Coordinator shall have and implement Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. These Operating Procedures, Operating Processes, or Operating Plans shall include, but are not limited to, the following:

1.1 Communications and notifications, and the process to follow in making those notifications.

1.2 Energy and capacity shortages.

1.3 Control of voltage, including the coordination of reactive resources.
Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments.

1.5 Authority to act to prevent and mitigate system conditions which could adversely impact other Reliability Coordinator Areas.

1.6 Provisions for weekly conference calls.

Rationale for EEA 2:
The EOP SDT modified the "Circumstances" for EEA 2 to show that an entity will be in this level when it has implemented its Operating Plan(s) to mitigate Emergencies but is still able to maintain Contingency Reserves.

Rationale for EEA 3:
This rationale was added at the request of stakeholders asking for justification for moving a lack of Contingency Reserves into the EEA3 category.

The previous language in EOP-002-3.1, EEA 2 used "Operating Reserve," which is an all-inclusive term, including all reserves (including Contingency Reserves). Many Operating Reserves are used continuously, every hour of every day. Total Operating Reserve requirements are kind of nebulous since they do not have a specific hard minimum value. Contingency Reserves are used far less frequently. Because of the confusion over this issue, evidenced by the comments received, the drafting team thought that using minimum Contingency Reserve in the language would eliminate some of the confusion. This is a different approach but the drafting team believes this is a good approach and was supported by several commenters.

Using Contingency Reserves (which is a subset of Operating Reserves) puts a BA closer to the operating edge. The drafting team felt that the point where a BA can no longer maintain this important Contingency Reserves margin is a most serious condition and puts the BA into a position where they are very close to shedding Load ("imminent or in progress"). The drafting team felt that this warrants categorization at the highest level of EEA.

Public Communications Plan
For Energy Emergency

INTRODUCTION

Should a potential emergency situation arise in the Northwest Power Pool (NWPP) area as a result of severe weather conditions or unexpected outages, the electricity community can best service the area if it presents clear, accurate and consistent information. Balancing authorities within the NWPP area need to know when any situation is approaching an emergency and when it has reached that stage, so they can act appropriately for conditions.

A coordinated effort can assure appropriate industry, government and policy interests, as well as the media and general public, are kept fully abreast of each situation as it develops. This attachment describes a coordinated plan for providing timely, balanced and useful information at each level of a potential power emergency.

Note that this communications plan does not include the technical/operational side of communications such as contacting control operators, utilities and regulatory/reliability entities. (See Northwest Power Pool Energy Emergency Plan for this information.) This attachment is aimed at communicating with utility industry executives, policy-makers, media and the general public.

WARNINGS AND CONDITIONS

Preparatory (or Normal) Condition

An overall communications coordinator is selected who will ensure linkages among policy-makers, operations personnel, spokespersons, and other communicators. The coordinator will select two co-coordinators to ensure round-the-clock coverage in the event emergency conditions worsen.

Together the coordinators will be responsible for overall implementation of the communications plan and, if the emergency progresses, will be freed up from their regular jobs to be on loan to the area during the duration of the crisis. The communications coordinators will serve the entire NWPP area electricity community, but not to the exclusion of speaking on behalf of their own companies.

A basic education plan using public service ads encouraging wise use of energy is developed and implemented. The messages should carry explicit recommendations, but not be tied to an emergency. (Timing is good because publicity about rising prices and potential shortages has made the public more receptive.) Ideally, all the area's utilities would contribute/participate.

Communicators will update lists (phone and fax numbers) of parties to be contacted, including but not limited to the parties below (sample contact list with numbers attached). Those who will make contacts will be designated to ensure no one person gets multiple calls. Some calls will require policy-level contacts, rather than communications personnel.

Western Electricity Coordinating Council (WECC)
North American Electric Reliability Corporation (NERC)
Department of Energy (DOE)
Operating entities (such as BPA, USBR, public utilities, and IOUs)
National Marine Fisheries Service (NMFS)
Technical Management Team (TMT)
Congressional delegation
Northwest Power and Conservation Council
Industry Reliability Associations
Energy Northwest
Governors' offices
State energy offices
State natural resource offices
Public utility commissions
Media

A letter or briefing vehicle is sent to key policy-makers informing them of the new winter emergency plan with its warning/alert approach. They will be informed that there will be regular updates if the area enters a warning or alert condition.

A media release will be sent out similarly explaining the new winter emergency plan. This will be followed up and reinforced with a media education program on the warning and alert system so that a subsequent warning announcement isn't over-interpreted as something to cause undue alarm.

Key messages to public:

- ***The area system is more strained than historically, but it would take prolonged extreme temperatures, high loads, or a combination of events to pose a threat.***
- ***The responsible course is for the area to be prepared for such a possibility no matter how remote.***
- ***The goal of the plan is to avert emergencies through a systematic, coordinated series of steps.***
- ***Emphasize the effort is cooperative, area-wide.***

Area parties agree to a set of principles to ensure consistent messages (see section heading called "principles" for some suggestions).

Area Emergency Warning 1

Local, state, federal policy-makers/regulators and media/public are informed of the warning.

News release is sent to the media.

Key messages to public:

- ***Inform of approaching cold front and condition of system.***
- ***Use cautionary tone; not an emergency at this point, but need to be prepared.***
- ***Emphasize that wise use of energy is always a good idea. (Individual utilities may want to provide tips in their service territories.)***
- ***Describe where one can go for more information.***

Designated spokespersons are selected to work with the communications coordinators to speak on an area basis during the developing emergency.

(Ideally, these would include policy-level and technical experts as well as the communications people.)

A communications coordinator will participate in all NWPP conference calls of the Emergency Response Team to help shape and subsequently oversee delivery of consistent messages to policy-makers and public.

Individual utilities are responsible for updating and implementing plans to notify local level (city, county) policy-makers such as mayors and commissioners.

Key communications support personnel are identified who will be available during a crisis to support the designated spokesperson(s): writers, staffing phones, media faxes, graphic support if needed.
A designated web site that the public can access will be set up ahead of time to post conditions.

Area Energy Warning 2 and 3

Communications coordinator(s) participate in all NWPP conference calls of the Emergency Response Team.

Local, state, federal policy-makers/regulators and public are informed and kept updated at each stage of warning or alert. Frequency of updates will be dictated by how rapidly conditions are changing.

A call-in line is set up and regularly updated to provide information to utility and policy officials not on conference calls.

A request is made to the area's governors to call on the public for conservation and/or shifting hours of electricity use.

- The call should provide specific steps the public can take.
- Timing is important. It must be early enough to have an effect in helping mitigate an emergency, but not so early that it sets up a "crying wolf" situation.
- The call should include information about what industries and others are doing to curtail so that the public takes the situation seriously.

As warnings progress in seriousness, media conferences will be set up to regularly brief the media. Technical people will be available to answer questions. An area info center will be set up to handle writing, answering phones, faxing and mailing releases, handling logistics for media conferences, etc.

Media updates will be sent out with increasing frequency as the warnings progress.

Key messages to public:

- ***Step up warning level; provide updates as warnings progress.***
- ***Provide more specific information about state of system.***
- ***Make clear this is a supply issue, not a price issue.***
- ***Detail steps being taken to avert emergency.***
- ***Provide estimates of potential duration of emergency in each phase.***
- ***Call for curtailment and/or shift of use (governors)***
- ***Repeat and intensify call for curtailment if a warning of level 3 is approaching.***
- ***If emergency progresses, provide warning of potential brownout/black outs.***
- ***Provide clear instructions to public of what they can expect/need to do.***
- ***Repeat steps being taken to avert emergency.***

Termination of Area Emergency Warnings

Follow-up communications to all policy/regulatory entities.

Media bulletin announcing end of warning.

Key messages to public:

- ***Emphasize continued monitoring of system conditions.***
- ***Reinforce wise use of energy is always a good idea***

Thank you acknowledgements and recognition go to those who contributed to averting or mitigating emergency.

A report is provided to policy-makers and media/public about what the area electricity community is continuing to do in the longer range to avoid emergency situations in the future.

Principles

All area parties agree to overall consistent messages when entering warnings of an alert and alert phases. (What we want to avoid is one party saying, "There's really no emergency;" while another says, “There is.”)

Consistent messages tailored to the situation will be developed through conferencing with the core group. When representing the area, rather than their own companies, communicators/spokesperson will act at the direction of the conference group.

Individual utilities and entities will not be barred from speaking for themselves in terms of what they individually are doing to prepare for and/or avert an emergency, in providing conservation tips, and in describing their own system conditions.

Area spokesperson(s) will provide load, reserves and any other market-sensitive numbers only in aggregate and in compliance with information sharing rules under the FERC Standards of Conduct.