



# Northwest Power Pool

## Energy Emergency Plan

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## TABLE OF CONTENTS

Background	2
Purpose	2
Potential Actions of the Emergency Plan	3
Energy Response Team Participants	3
Key Plan Components and Definitions	4
Procedure	7
Preparatory (or Normal) Condition .....	8
Anticipation of Area Warning .....	8
Northwest Power Pool Corporate Staff Review .....	8
Energy Response Team Action .....	9
Area Warning Posted .....	10
Termination of Warning .....	10
Lessons Learned	11
Public Communications Plan for Energy Emergency	11
Preparatory (or Normal) Condition .....	12
Area Emergency Warning 1 .....	13
Area Emergency Warning 2 and 3 .....	14
Termination of Area Emergency Warnings.....	15
Diagram 1	16



## 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 area's electric industry's expertise, communication, coordination, and cooperation are unique and have served this area and its consumers well.

The elements of the NWPP 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 various Reliability Coordinators (RC) are 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 EEP is a living document and will be revised periodically.

## 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 Alerts 1, 2, or 3 as defined in [NERC Reliability Standard EOP-011-1](#). 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.

## 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.

## ENERGY RESPONSE TEAM PARTICIPANTS

### Operating Committee

Balancing Authorities:

- Alberta Electric System Operator (AESO)
- Avista Corp (AVA)
- Avangrid Renewables, LLC (AVRN)
- 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)
- NorthWestern Energy (NWMT)
- NV Energy (NEVP)
- PacifiCorp (PACE and PACW)
- Portland General Electric Company (PGE)
- Xcel Energy, dba Public Service of Colorado (PSCO)
- Puget Sound Energy (PSE)
- Seattle City Light (SCL)
- Tacoma Power (TPWR)
- Turlock Irrigation District (TID)
- Western Area Power Administration – Colorado Missouri (WACME and Upper Great Plains (WAUW))

Non-Balancing Authorities:

- Calpine Corporation
- FortisBC
- Powerex Corporation
- Perennial Power Holdings, LLC
- Snohomish County Public Utility District
- U. S. Bureau of Reclamation

Others (by invitation):

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

## 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](#). 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:

- Determining the magnitude and duration of a potential emergency or longer-term energy adequacy problem,
- Assisting the communications coordinator to formulate the content of any relevant public message related to the potential emergency or problem, and
- 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:

- Facilitate meetings,
- Gather relevant data needed by the Energy Response Team, and
- 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:

- Facilitating meetings of the communications support team,
- Acting as a liaison between the communications support team and the Energy Response Team,
- Representing the Energy Response Team in public communications and the media, and
- Providing communication aids to the Energy Response Team and area policymakers.

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:



- Warning of a *potential* Area Power Emergency, or
- 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.

## **PROCEDURE**

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.





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## 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.

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## 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).

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## 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 energy imports, and/or increasing generating capability.

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#### 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, 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.



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## 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 Reliability Coordinator communication systems 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 Western Interconnection 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 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.
  - i. Take all possible economic and discretionary actions, including curtailing discretionary wholesale energy sales.
  - ii. Take extraordinary actions, including but not limited to:
    - a. Public appeals to reduce demand,
    - b. Voltage reduction,
    - c. Demand-side management,
    - d. Utility load conservation measures, and
    - e. Interruption of non-firm end use loads in accordance with applicable contracts.

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## TERMINATION OF 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. 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 per their individual company procedures.

## 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.

## PUBLIC COMMUNICATIONS PLAN FOR ENERGY EMERGENCY

Should a potential emergency situation arise in the Northwest Power Pool (NWPP) area as a result of severe weather conditions or unexpected facility 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. This attachment is aimed at communicating with utility industry executives, policymakers, media and the general public.

### 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.

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### PREPARATORY (OR NORMAL) CONDITION

An overall communications coordinator is selected who will ensure linkages among policymakers, 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 policymakers 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 is not 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).

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**AREA EMERGENCY WARNING 1**

Local, state, federal policymakers/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 policymakers and public.



Individual utilities are responsible for updating and implementing plans to notify local level (city, county) policymakers 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.

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### AREA EMERGENCY WARNING 2 AND 3

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

Local, state, federal policymakers/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.

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## TERMINATION OF AREA EMERGENCY WARNINGS

Follow-up communications to all policy/regulatory entities. The call should provide specific steps the public can take.

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 policymakers and media/public about what the area electricity community is continuing to do in the longer range to avoid emergency situations in the future.



**DIAGRAM 1**

