

NORTHWEST POWER POOL

Energy Emergency Plan

Revised October 2011

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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 Western Electricity Coordinating Council 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 Alert levels 1, 2, or 3 as defined in NERC Reliability Standard EOP-002-3 (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* the three levels of NERC Energy Emergency Alerts as described in the NERC Reliability Standard EOP-002-3 (Attachment 1). The EEP includes emergency warnings of *potential* NERC-defined Energy Emergency Alerts 1, 2, and 3. NERC assumes that a capacity deficiency will manifest itself as an energy emergency.

A NERC Energy Emergency Alert level 1 is possible if a balancing authority's forecasts (for a week or less) anticipate conditions where all available resources, including imports, are committed to meet firm load, firm transactions, and reserve

commitments; and, there is concern about sustaining required operating reserve when all possible economic and discretionary actions, including curtailing discretionary wholesale energy sales included in the forecasts.

A NERC Energy Emergency Alert level 2 is possible if a balancing authority's forecasts indicate firm loads can only be met after including in the projections 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.

A NERC Energy Emergency Alert level 3 is possible if a balancing authority forecasts firm load will be curtailed after assuming all the extraordinary actions described in level 2 are included in the forecasts.

➤ ***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 Alert levels 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-002-3 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 and load serving entities 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 WECCnet 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 and load-serving entities 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 or load serving entities may still be deficient and in NERC Alert status as defined in NERC Reliability Standard EOP-002-3 (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
Avista Corp
Balancing Authority of Northern California
Bonneville Power Administration – TBL
British Columbia Hydro and Power Authority
Chelan County Public Utility District
Douglas County Public Utility District
Grant County Public Utility District
Idaho Power Company
NaturEner Power Watch, LLC
NorthWestern Energy
PacifiCorp (East and West)
Portland General Electric Company
Puget Sound Energy
Seattle City Light
Sierra Pacific Power Company
Tacoma Power
Turlock Irrigation District
Western Area Power Administration – Upper Great Plains



Non-Balancing Authorities

ColumbiaGrid
Eugene Water and Electric Board
FortisBC
Iberdrola Renewables
Powerex Corporation
Snohomish County Public Utility District
U. S. Bureau of Reclamation

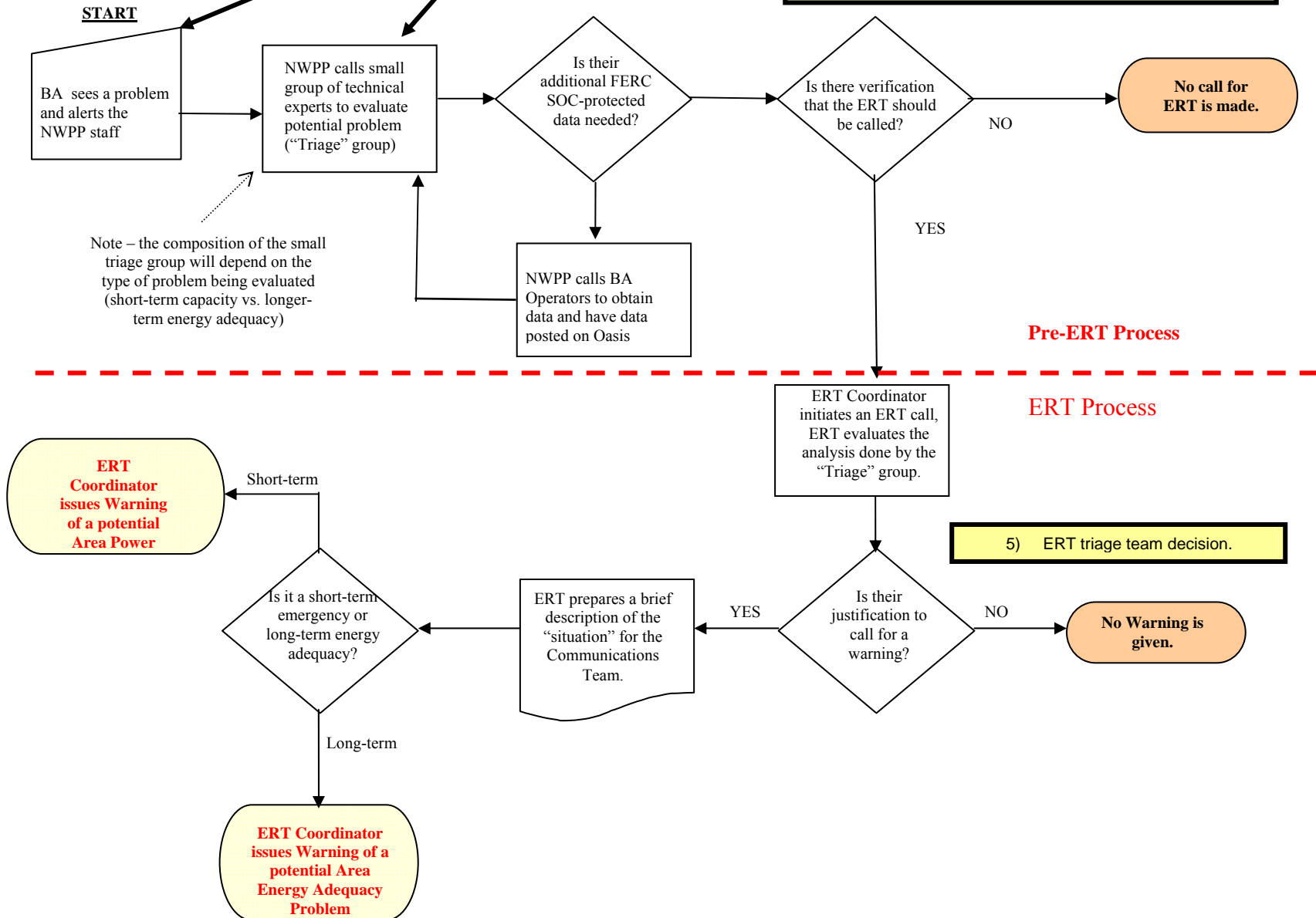
OTHERS (by invitation)

Affiliates, Marketers, Independent Power Producers, etc.
WECC Reliability Coordinator
ERT Communications Coordinator
Governmental Agencies
Northwest Gas Association
Northwest Power Planning Council
Northwest Power Pool 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.



Attachment 1-EOP-002-2.1
Energy Emergency Alerts

Introduction

This Attachment provides the procedures by which a Load Serving Entity can obtain capacity and energy when it has exhausted all other options and can no longer provide its customers' expected energy requirements. NERC defines this situation as an "Energy Emergency." NERC assumes that a capacity deficiency will manifest itself as an energy emergency.

The Energy Emergency Alert Procedure is initiated by the Load Serving Entity's Reliability Coordinator, who declares various Energy Emergency Alert levels as defined in Section B, "Energy Emergency Alert Levels," to provide assistance to the Load Serving Entity.

The Load Serving Entity who requests this assistance is referred to as an "Energy Deficient Entity."

NERC recognizes that Transmission Providers are subject to obligations under FERC-approved tariffs and other agreements, and nothing in these procedures should be interpreted as changing those obligations.

A. General Requirements

- 1. Initiation by Reliability Coordinator.** An Energy Emergency Alert may be initiated only by a Reliability Coordinator at 1) the Reliability Coordinator's own request, or 2) upon the request of a Balancing Authority, or 3) upon the request of a Load Serving Entity.
 - 1.1. Situations for initiating alert.** An Energy Emergency Alert may be initiated for the following reasons:
 - When the Load Serving Entity is, or expects to be, unable to provide its customers' energy requirements, and has been unsuccessful in locating other systems with available resources from which to purchase, or
 - The Load Serving Entity cannot schedule the resources due to, for example, Available Transfer Capability (ATC) limitations or transmission loading relief limitations.
- 2. Notification.** A Reliability Coordinator who declares an Energy Emergency Alert shall notify all Balancing Authorities and Transmission Providers in its Reliability Area. The Reliability Coordinator shall also notify all other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS). Additionally, conference calls between Reliability Coordinators shall be held as necessary to communicate system conditions. The Reliability Coordinator shall also notify the other Reliability Coordinators when the alert has ended.

B. Energy Emergency Alert Levels

Introduction

To ensure that all Reliability Coordinators clearly understand potential and actual energy emergencies in the Interconnection, NERC has established three levels of Energy Emergency Alerts. The Reliability Coordinators will use these terms when explaining energy emergencies to each other. An Energy Emergency Alert is an emergency procedure, not a daily operating practice, and is not intended as an alternative to compliance with NERC reliability standards or power supply contracts.

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

- 1. Alert 1 — All available resources in use.**

Circumstances:

- Balancing Authority, Reserve Sharing Group, or Load Serving Entity foresees or is experiencing conditions where all available resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required Operating Reserves, and
- Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements) have been curtailed.

2. Alert 2 — Load management procedures in effect.

Circumstances:

- Balancing Authority, Reserve Sharing Group, or Load Serving Entity is no longer able to provide its customers' expected energy requirements, and is designated an Energy Deficient Entity.
- Energy Deficient Entity foresees or has implemented procedures up to, but excluding, interruption of firm load commitments. When time permits, these procedures may include, but are not limited to:
 - Public appeals to reduce demand.
 - Voltage reduction.
 - Interruption of non-firm end use loads in accordance with applicable contracts¹.
 - Demand-side management.
 - Utility load conservation measures.

During Alert 2, Reliability Coordinators, Balancing Authorities, and Energy Deficient Entities have the following responsibilities:

- 2.1 Notifying other Balancing Authorities and market participants.** The Energy Deficient Entity shall communicate its needs to other Balancing Authorities and market participants. Upon request from the Energy Deficient Entity, the respective Reliability Coordinator shall post the declaration of the alert level along with the name of the Energy Deficient Entity and, if applicable, its Balancing Authority on the NERC website.
- 2.2 Declaration period.** The Energy Deficient Entity shall update its Reliability Coordinator of the situation at a minimum of every hour until the Alert 2 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the NERC website as changes occur and pass this information on to the affected Reliability Coordinators, Balancing Authority, and Transmission Providers.
- 2.3 Sharing information on resource availability.** A Balancing Authority and market participants with available resources shall immediately contact the Energy Deficient Entity. This should include the possibility of selling non-firm (recallable) energy out of available Operating Reserves. The Energy Deficient Entity shall notify the Reliability Coordinators of the results.
- 2.4 Evaluating and mitigating transmission limitations.** The Reliability Coordinators shall review all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs) and transmission loading relief procedures in effect that may limit the Energy Deficient Entity's scheduling capabilities. Where appropriate, the Reliability Coordinators shall inform

¹ For emergency, not economic, reasons.

the Transmission Providers under their purview of the pending Energy Emergency and request that they increase their ATC by actions such as restoring transmission elements that are out of service, reconfiguring their transmission system, adjusting phase angle regulator tap positions, implementing emergency operating procedures, and reviewing generation redispatch options.

2.4.1 Notification of ATC adjustments. Resulting increases in ATCs shall be simultaneously communicated to the Energy Deficient Entity and the market via posting on the appropriate OASIS websites by the Transmission Providers.

2.4.2 Availability of generation redispatch options. Available generation redispatch options shall be immediately communicated to the Energy Deficient Entity by its Reliability Coordinator.

2.4.3 Evaluating impact of current transmission loading relief events. The Reliability Coordinators shall evaluate the impact of any current transmission loading relief events on the ability to supply emergency assistance to the Energy Deficient Entity. This evaluation shall include analysis of system reliability and involve close communication among Reliability Coordinators and the Energy Deficient Entity.

2.4.4 Initiating inquiries on reevaluating SOLs and IROLs. The Reliability Coordinators shall consult with the Balancing Authorities and Transmission Providers in their Reliability Areas about the possibility of reevaluating and revising SOLs or IROLs.

2.5 Coordination of emergency responses. The Reliability Coordinator shall communicate and coordinate the implementation of emergency operating responses.

2.6 Energy Deficient Entity actions. Before declaring an Alert 3, the Energy Deficient Entity must make use of all available resources. This includes but is not limited to:

2.6.1 All available generation units are on line. All generation capable of being on line in the time frame of the emergency is on line including quick-start and peaking units, regardless of cost.

2.6.2 Purchases made regardless of cost. All firm and non-firm purchases have been made, regardless of cost.

2.6.3 Non-firm sales recalled and contractually interruptible loads and demand-side management curtailed. All non-firm sales have been recalled, contractually interruptible retail loads curtailed, and demand-side management activated within provisions of the agreements.

2.6.4 Operating Reserves. Operating reserves are being utilized such that the Energy Deficient Entity is carrying reserves below the required minimum or has initiated emergency assistance through its operating reserve sharing program.

3. Alert 3 — Firm load interruption imminent or in progress.

Circumstances:

- Balancing Authority or Load Serving Entity foresees or has implemented firm load obligation interruption. The available energy to the Energy Deficient Entity, as determined from Alert 2, is only accessible with actions taken to increase transmission transfer capabilities.

3.1 Continue actions from Alert 2. The Reliability Coordinators and the Energy Deficient Entity shall continue to take all actions initiated during Alert 2. If the emergency has not already been posted on the NERC website (see paragraph 2.1), the respective Reliability Coordinators will, at this time, post on the website information concerning the emergency.

- 3.2 Declaration Period.** The Energy Deficient Entity shall update its Reliability Coordinator of the situation at a minimum of every hour until the Alert 3 is terminated. The Reliability Coordinator shall update the energy deficiency information posted on the NERC website as changes occur and pass this information on to the affected Reliability Coordinators (via the RCIS), Balancing Authorities, and Transmission Providers.
- 3.3 Use of Transmission short-time limits.** The Reliability Coordinators shall request the appropriate Transmission Providers within their Reliability Area to utilize available short-time transmission limits or other emergency operating procedures in order to increase transfer capabilities into the Energy Deficient Entity.
- 3.4 Reevaluating and revising SOLs and IROLs.** The Reliability Coordinator of the Energy Deficient Entity shall evaluate the risks of revising SOLs and IROLs on the reliability of the overall transmission system. Reevaluation of SOLs and IROLs shall be coordinated with other Reliability Coordinators and only with the agreement of the Balancing Authority or Transmission Operator whose equipment would be affected. The resulting increases in transfer capabilities shall only be made available to the Energy Deficient Entity who has requested an Energy Emergency Alert 3 condition. SOLs and IROLs shall only be revised as long as an Alert 3 condition exists or as allowed by the Balancing Authority or Transmission Operator whose equipment is at risk. The following are minimum requirements that must be met before SOLs or IROLs are revised:
- 3.4.1 Energy Deficient Entity obligations.** The deficient Balancing Authority or Load Serving Entity must agree that, 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.
- 3.4.2 Mitigation of cascading failures.** The Reliability Coordinator shall use its best efforts to ensure that revising SOLs or IROLs would not result in any cascading failures within the Interconnection.
- 3.5 Returning to pre-emergency Operating Security Limits.** Whenever energy is made available to an Energy Deficient Entity such that the transmission systems can be returned to their pre-emergency SOLs or IROLs, the Energy Deficient Entity shall notify its respective Reliability Coordinator and downgrade the alert.
- 3.5.1 Notification of other parties.** Upon notification from the Energy Deficient Entity that an alert has been downgraded, the Reliability Coordinator shall notify the affected Reliability Coordinators (via the RCIS), Balancing Authorities, and Transmission Providers that their systems can be returned to their normal limits.
- 3.6 Reporting.** Any time an Alert 3 is declared, the Energy Deficient Entity shall submit the report enclosed in this Attachment to its respective Reliability Coordinator within two business days of downgrading or termination of the alert. Upon receiving the report, the Reliability Coordinator shall review it for completeness and immediately forward it to the NERC staff for posting on the NERC website. The Reliability Coordinator shall present this report to the Reliability Coordinator Working Group at its next scheduled meeting.
- 4. Alert 0 - Termination.** When the Energy Deficient Entity believes it will be able to supply its customers' energy requirements, it shall request of its Reliability Coordinator that the EEA be terminated.
- 4.1. Notification.** The Reliability Coordinator shall notify all other Reliability Coordinators via the RCIS of the termination. The Reliability Coordinator shall also notify the

affected Balancing Authorities and Transmission Operators. The Alert 0 shall also be posted on the NERC website if the original alert was so posted.

C. Energy Emergency Alert 3 Report

A Deficient Balancing Authority or Load Serving Entity declaring an Energy Emergency Alert 3 must complete the following report. Upon completion of this report, it is to be sent to the Reliability Coordinator for review within two business days of the incident.

Requesting Balancing Authority:

Entity experiencing energy deficiency (if different from Balancing Authority):

Date/Time Implemented:

Date/Time Released:

Declared Deficiency Amount (MW):

Total energy supplied by other Balancing Authority during the Alert 3 period:

Conditions that precipitated call for “Energy Deficiency Alert 3”:

If “Energy Deficiency Alert 3” had not been called, would firm load be cut? If no, explain:

Explain what action was taken in each step to avoid calling for “Energy Deficiency Alert 3”:

- 1. All generation capable of being on line in the time frame of the energy deficiency was on line (including quick start and peaking units) without regard to cost.**

- 2. All firm and nonfirm purchases were made regardless of cost.**

- 3. All nonfirm sales were recalled within provisions of the sale agreement.**

- 4. Interruptible load was curtailed where either advance notice restrictions were met or the interruptible load was considered part of spinning reserve.**

- 5. Available load reduction programs were exercised (public appeals, voltage reductions, etc.).**

- 6. Operating Reserves being utilized.**

Comments:

Reported By:

Organization:

Title:

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.