

*Proposed*  
**Pacific Northwest**  
**Winter 2000-01**  
**Energy Emergency Plan**

**November 2000**

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**Attachment 1 – NERC Policy 9, Appendix 9B (Energy Emergency Alerts)**

**Attachment 2 – Public Communications Plan**

**Attachment 3 – Emergency Response Team Members**

# Proposed Pacific Northwest Winter 2000-01 Energy Emergency Plan

## I. Background

Utilities and agencies 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. The Northwest electric industry's expertise, communication, coordination, and cooperation are unique and have served this region and its consumers well.

However, it has been a number of years since the last of these occurrences. Since that time, a number of changes have occurred:

- Interconnected load has continued to increase at a faster rate than the increase in generating and transmission resources.
- New regulations are now in place that enhance market competition, but restrict the ways in which the various elements of our industry may communicate.
- A new entity, the Pacific Northwest Security Coordinator (Security Coordinator), has been created and staffed to increase the vision, awareness, and effectiveness of control area operators, especially during times of duress.
- New policies and procedures have been adopted by North American Electric Reliability Council (NERC) in order to mitigate reliability problems, including "Energy Emergencies".
- Other (primarily summer peaking) areas have recently experienced Energy Emergencies. These occurrences offer insights as to how the Northwest should proceed.

The PNUCC Task Force considered the recent circumstances and developed the following plan. The participants of the Task Force are identified in section VIII.

## II. Purpose

The overarching purpose of this Energy Emergency Plan (Plan) is to increase the region's ability to avoid a power emergency by promoting regional coordination and communications. This Plan is aimed at promoting actions in advance of a potential emergency that could alleviate the need for the Security Coordinator to declare a NERC Energy Emergency Alert 1, 2, or 3 as defined in the NERC Policy 9, Appendix 9B (Attachment 1). This Plan is designed for a power shortfall situation and is only invoked

after all market possibilities are exhausted, regardless of price, and there is not enough power available.

This Plan is not intended to supplant any entity's authorities, but rather it provides the framework for how the utilities, the states, and other entities of the Pacific Northwest 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 Plan focuses on regional actions and is intended to work with and complement current state and federal regulations and policies in place for individual control areas and load serving entities.

The intended audiences for this Plan are operating entities, near-term planners and policy makers in the electric power industry and the region's state and federal governments. It provides objectively defined criteria for communicating emergency warnings within the region that are based on analysis of the load and resource situation. The Plan identifies generic regional 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 this Plan as a procedural framework for identifying the individual actions they will be able to take in each of the warning stages defined below.

### **III. Potential Actions of the Emergency Plan**

In accordance with this Plan, following the declaration of an Regional Emergency Warning, entities in the region may take a range of actions to avoid declaration of an official NERC Energy Emergency Alert. 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 region 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**

This Plan is designed to work in tandem with *and in advance of* the three levels of NERC Alerts as described in the NERC Policy 9, Appendix 9B (Attachment 1). The Plan 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.

### ➤ **Preparatory (or Normal) Condition**

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

### ➤ **Emergency Response Team**

Participants of the Emergency Response Team will be key individuals who are permitted access to the operational information necessary to evaluate the regional situation and who have the authority to make and implement operational decisions. The Emergency Response Team also will include representatives from the states, the Security Coordinator, a communications coordinator, and NWPP staff members. See Attachment 3 for the list of the Emergency Response Team members.

The Emergency Response Team will be responsible for determining the magnitude and duration of a potential emergency and deciding whether to recommend that the Security Coordinator post a Regional Emergency Warning as defined below. The Emergency Response Team will periodically assess whether it should include additional participants, either for a specific incident or on an ongoing basis.

Participants of the Emergency 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 emergency 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.

➤ ***Regional Emergency Warning of a Potential Alert 1***

The Security Coordinator will declare a Regional Emergency Warning of a Potential NERC Energy Emergency Alert 1 if regional 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 reserves when all possible economic and discretionary actions, including curtailing nonfirm wholesale energy sales are included in the forecasts.

➤ ***Regional Emergency Warning of Potential Alert 2***

A Regional Emergency Warning of a Potential NERC Energy Emergency Alert 2 will be declared by the Security Coordinator if the regional 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.

➤ ***Regional Emergency Warning of a Potential Alert 3***

A Regional Emergency Warning of a Potential NERC Energy Emergency Alert 3 will be declared by the Security Coordinator if the region forecasts firm loads will be curtailed after assuming all the extraordinary actions described in level 2 are included in the forecasts.

➤ ***Termination of Regional Emergency Warning or NERC Alert***

This ends a Regional Emergency Warning or NERC Alert. The Security Coordinator declares that the Regional Emergency Warning or NERC Alert has ended when forecasts show adequate energy to meet forecast demands including reserves.

## **V. Procedures**

Below is a general description of the overall procedure as the region moves from business as usual to an anticipated emergency situation. It defines the roles and responsibilities of various parties, including required analysis and triggers for declaring a Regional Emergency Warning. Control area operator and load serving entity actions will be guided by NERC Policy 9, Appendix 9B (Attachment 1) as well as those actions defined below. The roles and responsibilities of the state agencies and communicators are indicated below. Additional details are also included in the Public Communication Plan found at Attachment 2.

➤ ***Preparatory (or Normal) Condition***

- a. Control area operators and load serving entities serve load and comply with all NERC, WSCC and NWPP reliability standards.
- 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 Emergency Response Team.
- e. Conduct a regional education campaign focused on wise energy use.
- f. Complete contact lists for utility executives, regional policy makers, media and other appropriate parties (e.g. interest groups).
- g. Release a media message that explains the need for and purpose of the Plan, and conduct media and editorial board briefings to set context (status of the system) and answer questions.

➤ ***Anticipation of Regional Problem***

- a. Ongoing operational planning and forecasting by all entities may foresee a need to consider a Regional Emergency Warning. If, as a result of operational studies or credible weather forecasts, operational planners forecast a near-term (one week or less) shortfall in meeting load, they will contact the NWPP staff.
- b. Utility executives and local, state, and federal 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 Review***

- a. The NWPP will announce that they are reviewing regional analysis and ask all entities to initiate intensive, focused forecasting of loads and available generation and transmission capability.
- b. 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.
- c. The NWPP staff will gather and aggregate additional information from regional entities to confirm the concern.

- d. The NWPP will convene conference calls of the Emergency Response Team as appropriate.

➤ **Emergency Response Team Action**

- a. The NWPP staff will host conference calls of the Emergency Response Team to clarify information, evaluate the situation, and identify actions to avoid declaring Regional Emergency Warnings of Potential NERC Energy Emergency Alerts 1, 2, or 3. It is anticipated that the convening of the Emergency Response Team will be triggered by a resource or transmission outage event or a forecast of a significant departure from normal operations (such as an expected cold-snap).
- b. The Emergency Response Team will conduct its communications so that any discussions relating to transmission comply with FERC Standards of Conduct. The Emergency Response Team will first determine what portion of the region's load it believes cannot be met by resources within the region. Once the regional assessment has been completed, the participants in the Emergency Response Team who may freely discuss transmission information (under FERC Standards of Conduct) will assess the region'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 Emergency 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 Emergency Response Team will determine the magnitude and duration of the potential emergency and recommend to the Security Coordinator the level of Emergency Warning to post (as described below). The Security Coordinator will determine whether to post a Regional Emergency Warning based on the consensus opinion of the Emergency Response Team. In a fast moving situation, the Security Coordinator may post a Regional Emergency Warning without a recommendation from the Emergency Response Team; the NWPP be will informed of this action.
- d. During a Regional Emergency Warning, the Emergency 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 control area operators and load serving entities to determine if all actions for avoiding the next warning level have been exhausted. There may be situations where stakeholders have not taken every measure expected when a Warning of a Potential NERC Energy Emergency Alert 1, 2, or 3 is triggered.
- e. The communications coordinator will work with the Emergency Response Team and entities to determine designated spokespersons and will set up a communications support team. Depending on the severity of the emergency and time constraints, the communications coordinator will, as appropriate, work with regional policy makers to formulate a coordinated and consistent public message.

➤ **Regional Emergency Warning Posted**

- a. If the Emergency Response Team determines a Regional Emergency Warning is warranted it will advise the Security Coordinator. The Security Coordinator will post a Regional Emergency Warning of a Potential NERC Energy Emergency Alert 1, 2, or 3 on the NWPP web site, the NERC web site, and through WSCCnet. (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) of the anticipated problems. Warnings of potential alert levels do not need to be issued sequentially.
- b. The NWPP staff will continue to convene conference calls of the Emergency Response Team and work as needed with others in the WSCC region until the crisis has passed. The Emergency 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; local, state and federal policy makers; and the public informed as to important developments regarding the status of the electrical system. A 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. Emergency Response Team participants will work with state and local government representatives to develop ideas about state and local governmental actions that could be taken in each situation.
- e. Control area operators and load-serving entities implement actions assumed in the forecast for declaring a Regional Emergency Warning.

*Regional Emergency Warning of a Potential Alert 1* – take all possible economic and discretionary actions, including curtailing nonfirm wholesale energy sales.

*Regional Emergency Warning of Potential Alert 2 or 3* – 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 Regional Emergency Warnings**

- a. When the Emergency Response Team and others have determined that the regional system is no longer at immediate risk, that the condition which triggered the Regional Emergency Warning no longer exists, and there are no expectations of a regional emergency warning condition in the next few weeks, the Security Coordinator will declare the Regional Emergency 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 control area operators or load serving entities may still be deficient and in NERC Alert status as defined in NERC Policy 9, Appendix 9B (See Attachment 1). Therefore, it is possible that a specific entity may maintain its Energy Emergency Alert status after the regional warning has ended.
- 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 a Regional Emergency 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. Parking Lot Issues**

- Participants on the Emergency Response Team - California ISO, Canadian operating entities, provincial representatives?
- How can we gather and include information regarding day-, week-, month-ahead extraregional block sales so that it can be included in projections for next day, week, month forecasts of loads and resources? How can we develop a security repository for these data?

## VIII. Task Force Participants

Alcoa, Kaiser, Columbia Falls Alum.	Michael Early
BPA	Steve Hickok, Steve Wright, Dulcy Mahar
BPA – Power Business Line	Greg Delwiche, Phil Mesa, Steve Kerns
BPA – Transmission Business Line	Vickie VanZandt, Don Watkins, Dick Spence
Corps of Engineers	Cathy Hlebechuk, Rudd Turner
Consultant	Dennis Rohr
EWEB	Randy Berggren
Idaho PUC	David Schunke
NW Power Planning Council	Dick Watson, Ken Corum
NW Power Pool	Christine Elliott, Don Badley
Montana DEQ	Paul Cartwright
Montana Power Company	Mike Cashell
Northwest Gas Association	John Jones
Oregon Department of Energy	John Savage
Portland General Electric	Walt Pollock, Marlene Huntsinger
PNW Security Coordinator	Jack Bernhardsen, Dick Schwarz
PNUCC	Dick Adams, Shauna McReynolds
PacifiCorp	Steve Waddington, John Apperson
Public Power Council	Sue Furst
Puget Power	Bill Gaines
Tacoma Power	Steve Klein, Marcy Sizer
Washington CTED	Dave Warren

## Appendix 9B –Energy Emergency Alerts

Version 2, Draft 4

I. For  
Implementation  
July 1, 2000

### IX. Appendix Sections

- A. General Requirements
- B. Energy Emergency Alert Levels
- C. Energy Emergency Alert 3 Report

### X. Introduction

This Appendix 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 LSE's Security Coordinator, who declares various Energy Emergency Alert levels as defined in Section B, "Energy Emergency Alert Levels" to provide assistance to the LSE.

The LSE 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

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1. **Initiated only by Security Coordinator.** An Energy Emergency Alert may be initiated only by a SECURITY COORDINATOR at 1) the SECURITY COORDINATOR'S own request, or 2) upon the request of a CONTROL AREA, or 3) upon the request of a LOAD SERVING ENTITY. The cost of available resources shall not be a consideration for initiating an alert.
  - 1.1. **Situations for initiating Alert.** An Energy Emergency Alert may be initiated for the following reasons:
    - When the LSE 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 LSE cannot schedule the resources due to, for example, ATC limitations or transmission loading relief limitations.
2. **Notification.** A SECURITY COORDINATOR who declares an Energy Emergency Alert shall notify all CONTROL AREAS and TRANSMISSION PROVIDERS in his SECURITY AREA. The SECURITY COORDINATOR shall also notify all other SECURITY COORDINATORS of the situation via the Security Coordinator Information System (SCIS). Additionally, conference calls between SECURITY COORDINATORS shall be held as necessary to communicate system conditions. The SECURITY COORDINATOR shall also notify the other SECURITY COORDINATORS when the Alert has ended.

## B. Energy Emergency Alert Levels

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### XI. Introduction

To ensure that all SECURITY COORDINATORS clearly understand potential and actual energy emergencies in the INTERCONNECTION, NERC has established three levels of Energy Emergency Alerts. The SECURITY 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 Operating Policies or power supply contracts.

The Security 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:

- CONTROL AREA, 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:

- CONTROL AREA, 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 contracts<sup>1</sup>
  - Demand-side management
  - Utility load conservation measures

During Alert 2, SECURITY COORDINATORS, CONTROL AREAS, and ENERGY DEFICIENT ENTITIES have the following responsibilities:

- 2.1 **Notifying other Control Areas and Market Participants.** The ENERGY DEFICIENT ENTITY shall communicate its needs to other CONTROL AREAS and market participants. Upon request from the ENERGY DEFICIENT ENTITY, the respective SECURITY COORDINATOR shall post the

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<sup>1</sup> For emergency, not economic, reasons.

**B. Energy Emergency Alert Levels**

declaration of the Alert level along with the name of the ENERGY DEFICIENT ENTITY and, if applicable, its CONTROL AREA on the NERC Web site

- 2.2 Declaration Period.** The ENERGY DEFICIENT ENTITY shall update its SECURITY COORDINATOR of the situation at a minimum of every hour until the Alert 2 is terminated. The SECURITY COORDINATOR shall update the energy deficiency information posted on the NERC web site as changes occur and pass this information on to the affected SECURITY COORDINATORS, CONTROL AREAS, and Transmission Providers.
- 2.3 Sharing information on resource availability.** CONTROL AREAS 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 SECURITY COORDINATORS of the results.
- 2.4 Evaluating and mitigating transmission limitations.** The SECURITY COORDINATORS shall review all OPERATING SECURITY LIMITS and transmission loading relief procedures in effect that may limit the ENERGY DEFICIENT ENTITY’S scheduling capabilities. Where appropriate, the SECURITY COORDINATORS shall inform the Transmission Providers under their purview of the pending ENERGY EMERGENCY and request that they increase their Available Transfer Capability (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 sites 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 SECURITY COORDINATOR.
- 2.4.3 Evaluating impact of current transmission loading relief events.** The SECURITY 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 security and involve close communication among SECURITY COORDINATORS and the ENERGY DEFICIENT ENTITY.
- 2.4.4 Initiating inquiries on reevaluating OPERATING SECURITY LIMITS.** The SECURITY COORDINATORS shall consult with the CONTROL AREAS and Transmission Providers in their SECURITY AREAS about the possibility of reevaluating and revising OPERATING SECURITY LIMITS.
- 2.5 Coordination of emergency responses.** The SECURITY 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.

**B. Energy Emergency Alert Levels**

- 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 DSM 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:**

- CONTROL AREA 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 SECURITY 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 web site (see paragraph 2.1), the respective SECURITY COORDINATORS will, at this time, post on the web site information concerning the emergency.
- 3.2 Declaration Period.** The ENERGY DEFICIENT ENTITY shall update its SECURITY COORDINATOR of the situation at a minimum of every hour until the Alert 3 is terminated. The SECURITY COORDINATOR shall update the energy deficiency information posted on the NERC web site as changes occur and pass this information on to the affected SECURITY COORDINATORS (via the SCIS), CONTROL AREAS, and Transmission Providers.
- 3.3 Use of Transmission s hort-time limits.** The Security Coordinators shall request the appropriate Transmission Providers within their Security 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 OPERATING SECURITY LIMITS.** The Security Coordinator of the ENERGY DEFICIENT ENTITY shall evaluate the risks of revising Operating Security Limits on the reliability of the overall transmission system. Reevaluation of Operating Security Limits shall be coordinated with other SECURITY COORDINATORS and only with the agreement of the CONTROL AREA or Transmission Provider whose equipment would be affected. The resulting increases in transfer capabilities shall only be made available to the ENERGY DEFICIENT ENTITY who has declared an Energy Emergency Alert 3 condition. OPERATING SECURITY LIMITS shall only be revised as long as an Alert 3 condition exists or as allowed by the CONTROL AREA or Transmission Provider whose equipment is at risk. The following are minimum requirements that must be met before OPERATING SECURITY LIMITS are revised:
- 3.4.1 ENERGY DEFICIENT ENTITY obligations.** The deficient CONTROL AREA or LOAD SERVING ENTITY must agree that, upon notification from its

**B. Energy Emergency Alert Levels**

SECURITY 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 SECURITY COORDINATOR shall use his best efforts to ensure that revising OPERATING SECURITY LIMITS 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 OPERATING SECURITY LIMITS, the ENERGY DEFICIENT ENTITY shall notify its respective SECURITY 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 SECURITY COORDINATOR shall notify the affected SECURITY COORDINATORS (via the SCIS), CONTROL AREAS, and Transmission Providers that their systems can be returned to their normal OPERATING SECURITY LIMITS.

**3.6 Reporting.** Any time an Alert 3 is declared, the ENERGY DEFICIENT ENTITY shall complete the report listed in appendix 9B, Section C and submit this report to its respective SECURITY COORDINATOR within two business days of downgrading or termination of the Alert. Upon receiving the report, the SECURITY COORDINATOR shall review it for completeness and immediately forward it to the NERC staff for posting on the NERC web site. The SECURITY COORDINATOR shall present this report to the SECURITY COORDINATOR SUB-COMMITTEE 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 his SECURITY COORDINATOR that the EEA be terminated.

**4.1. Notification.** The SECURITY COORDINATOR shall notify all other SECURITY COORDINATORS via the SCIS of the termination. The SECURITY COORDINATOR shall also notify the affected CONTROL AREAS and TRANSMISSION PROVIDERS. The Alert 0 shall also be posted on the NERC web site if the original Alert was so posted.

### C. Energy Emergency Alert 3 Report

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NERC policy 9B section B paragraph 3.5 requires that a Deficient Control Area or Load Serving Entity declaring a Energy Emergency Alert 3 must complete the following report. Upon completion of this report it is to be sent to the Security Coordinator for review within two business days of the incident.

**Requesting Control Area:**

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**Entity experiencing energy deficiency (if different from Control Area):**

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**Date/Time Implemented:**

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**Date/Time Released:**

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**Declared Deficiency Amount (MW):**

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**Total Energy supplied by other Control Areas During the Alert 3 period:**

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

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

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**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.
- 
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3. All nonfirm sales were recalled within provisions of the sale agreement.
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4. **Interruptible load was curtailed where either advance notice restrictions were met or the interruptible load was considered part of spinning reserve.**

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

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6. **Operating Reserves being utilized.**

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**Comments:**

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**Reported By:**

**Organization:**

**Title:**

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## Attachment 2

# Proposed Public Communications Plan For Winter 2000-01 Energy Emergency Plan

### Introduction

Should a potential emergency situation arise in the Northwest as a result of severe weather conditions or unexpected outages, the electricity community can best service the region if it presents clear, accurate and consistent information. It will be critical to walk a fine line to avoid communicating in a way that will either cause panic or undue complacency.

A coordinated effort can ensure 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 Pacific Northwest Winter 2000 Energy Emergency Plan for this information.) This attachment is aimed at communicating with utility industry executives, policymakers, media and the general public.

### Warnings and Conditions

#### *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 region during the duration of the crisis. The communications coordinators will serve the entire regional electricity community, but not to the exclusion of speaking on behalf of their own companies.

A basic regional 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 region'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 Systems Coordinating Council (WSCC)  
North American Electric Reliability Council (NERC)  
Department of Energy (DOE)  
Operating entities (such as BPA, Corps, BOR, public utilities, and IOUs)  
National Marine Fisheries Service (NMFS)  
Technical Management Team (TMT)  
Congressional delegation  
Northwest Power Planning Council  
Industry Reliability Associations (e.g. PNUCC, NWPP)  
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 region 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 regional 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 region 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, regionwide.***

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

### *Regional 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 a regional 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, graphics support if needed.

A designated web site that the public can access will be set up ahead of time to post conditions.

### ***Regional Energy 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 region's governors to publicly 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 (e.g. Calif. was at stage 2 much of the summer, so after a while, conservation calls lost some of their force).
- 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. A regional 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 Regional 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 yous and recognition go to those who contributed to averting or mitigating emergency.

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

### *Principles*

All regional parties agree to overall consistent messages when entering warnings of and 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 region, 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.

Regional 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.