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**Received - 2022-05-30 09:32:34 PM**  
**Control Number - 53385**  
**ItemNumber - 625**



## **§25.53 EMERGENCY OPERATIONS PLAN**

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## Definitions

- **Annex:** A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
- **Drill:** An operations-based exercise that is a coordinated, supervised activity employed to test an entity's Emergency Operations Plan (EOP) or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
- **Emergency:** A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or Electric Reliability Council of Texas (ERCOT) or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
- **Entity:** An electric utility, transmission and distribution utility, Power Generation Company (PGC), municipally owned utility (MOU), electric cooperative, Retail Energy Providers (REPs), or ERCOT.
- **Electric Reliability Council of Texas (ERCOT):** The independent system operator for the region, ERCOT schedules power on an electric grid that connects more than 52,700 miles of transmission lines and 1,030+ generation units. It also performs financial settlement for the competitive wholesale bulk-power market and administers retail switching for nearly 8 million premises in competitive choice areas.
- **Hazard:** A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
- **Threat:** The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.
- **Public Utility Commission of Texas (Commission) (PUCT):** The Public Utility Commission of Texas regulates the state's electric, telecommunication, and water and sewer utilities, implements respective legislation, and offers customer assistance in resolving consumer complaints.
- **Office of Public Utility Counsel (OPUC):** The Office of Public Utility Counsel (OPUC) was created by the Texas Legislature in 1983 to represent the interests of residential and small commercial consumers, as a class, in utility proceedings in Texas. Pursuant to its current statutory mission, OPUC represents residential and small commercial consumers, as a class, in the electric, water, wastewater, and telecommunications utility industries in Texas. OPUC primarily represents these consumers before the PUCT, State Office of Administrative Hearings (SOAH), state courts and ERCOT.
- **Texas Division of Emergency Management (TDEM):** The Texas Division of Emergency Management (TDEM) coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters. TDEM implements programs to increase public awareness about threats and hazards, coordinates emergency planning, provides an extensive array of specialized training for emergency responders

and local officials, and administers disaster recovery and hazard mitigation programs in the State of Texas.

**Note: Other relevant terms are defined in EOP Sections and Annexes.**

## **Safety**

**The City of Farmersville (COF) Safety Program / Safety Manual always remains in effect. During any type or level of emergency the policies, procedures, and information contained in the Safety Manual is to be adhered to by all COF personnel, with no exceptions.**

In a major electric system event, COF may augment safety personnel with safety coordinators from other entities and/or agencies. Safety Coordinators will be assigned to each contractor that is assisting with restoration and ensure all crews follow safety procedures and policies, and engage in ongoing communications focused on safety rules, procedures, and strategies, during all phases of restoration efforts.

## **Business Continuity & Mutual Aid**

COF recognizes that providing reliable electrical power to its customers is a critical component of maintaining the health, safety, welfare, and quality of life for the community we serve. The COF Electric Utility also recognizes that disruptions to its ability to provide uninterrupted services can and will occur for a number of reasons or events including equipment failure, weather, accidents, intentional physical or cyber-attacks, wildfires, and other unforeseen circumstances.

- COF has created and maintains plans, policies, and procedures that are intended to ensure that the city and its utility operations remain prepared to address emergency events as they arise in order to return to normal operations after an emergency event or disruption of service in a safe and efficient manner.

COF shall coordinate with the Texas Public Power Association (TPPA), regional utilities, and qualified contractors to provide appropriate resources in an event of a scale that requires outside resources, equipment, and personnel.

- If COF determines the need for outside assistance, the City Manager/Public Works Director shall make any formal requests for outside assistance.
- COF may directly contact area utilities to arrange support.
- COF may directly contact current contractors to arrange support.
- COF is a member of the TPPA and shall coordinate and communicate with TPPA as needed if an emergency event or situation requires TPPA assistance.
- The general procedure for securing emergency assistance / outside restoration resources is as follows:
  - Survey the extent of damage and determine as soon as possible to determine potential requirement for outside resources in terms of personnel and equipment.
  - Consult TPPA for information on other Municipal Utilities, and contractors to determine available manpower, equipment, tools, inventory, and overall ability to provide resources.



## **§25.53 EMERGENCY OPERATIONS PLAN SECTIONS**



## **(Section-1) Approval and Implementation Section**

### **1.0 Plan Revisions / Approval(s)**

This version of the City of Farmersville (COF) Emergency Operations Plan (EOP) was developed to comply with the 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. The 16 TAC §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021, including requiring Municipally Owned Utilities (MOUs) to comply with 16 TAC §25.53.


The EOP is intended to provide COF with a clear set of guidelines, policies, and procedures, designed to guide the City's preparations, responses, and actions related to all phases and types of electric system emergencies.

This Plan is a living document and shall be reviewed and updated on a regular basis. The City Manager/Public Works Director is responsible for coordinating these systematic updates.

\* Note – Each approved / active version of the Plan remains in effect until replaced / superseded by an updated and approved version.

### **PLAN APPROVAL / VERSION**

<b>Date</b>	<b>Version</b>	<b>Description</b>
May 23, 2022	1	Initial EOP Pursuant to 16 TAC §25.53 All previous versions of COF EOP are superseded.



Benjamin (Ben) L. White, P.E., CPM  
City Manager/Public Works Director  
City of Farmersville

2022, May 26  
Date

### **Individual(s) Responsible for Plan Administration**

The individual(s) listed in the Table below are responsible for maintaining, updating, and implementing the Emergency Operations Plan and, have been designated to have authority to change the Plan:

<b>Name</b>	<b>Title</b>	<b>Responsibility</b>	<b>Authority to Change / Approve</b>
Benjamin (Ben) L. White, P.E., CPM	City Manager/Public Works Director	Plan Administrator. Maintains and provides proposed updates and modifications. Must review and approve all changes to the EOP.	Authority to change EOP. Must approve all changes to EOP.

**Change History Log:** The change history below reflects modifications and updates to the EOP Document:

**Description of Prominent Changes**

**Date**

## **1.1 Introduction and Applicability**

### **1.1.1 Message from the City Manager**

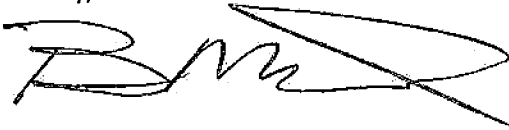
Operating safely and effectively during electric system emergency situations is extremely important to our customers and our organization. In times of emergency events, our customers depend on us to restore service and the public depends on us for accurate and timely information. Our personnel deserve well-conceived policies and procedures to guide and direct their actions during difficult and oftentimes very fluid situations.

Our Emergency Operations Plan is a guide and resource that has been developed to provide the structure and the integrated policies and procedures to direct our Electric System personnel, Emergency Coordinators, department managers and supervisors, and frontline employees during all types of electric system emergency conditions and situations.

This plan is only as good as we make it. That is why we ask all City of Farmersville personnel to work with your supervisor, your team, and your fellow employees to understand the plan, ask questions, and strive to fully comprehend the information contained in this planning document. Every department and every employee has a part to play in this effort.

I know each of you will perform at the highest level when the weather is extreme, when our customers are out of power, and when adverse conditions occur. Thank you for your attention to the information in our Emergency Operations Plan and your commitment to serving our customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. White', with a large, sweeping flourish extending to the right.

Benjamin (Ben) L. White, P.E., CPM  
City Manager/Public Works Director  
City of Farmersville

### **1.1.2 Purpose / Goals**

**The purpose of the Emergency Operations Plan is to provide the City of Farmersville with the information, policies, and procedures needed to prepare for and effectively manage an electric system emergency event or situation.**

This document satisfies the requirements of the Public Utility Commission of Texas (PUCT) Emergency Operations Plan (Substantive Rule 25, §25.53) and is intended to guide the organization in the preparation for electric system emergencies and to provide a framework for important tasks and actions required during a system emergency.

**COF maintains an Emergency Operations Plan in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service.** The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- **Provide the structure, policies, and procedures to guide the organization** during all types of emergency conditions and situations.
- **Enable COF, other utility and governmental entities, customers, and stakeholders to coordinate and communicate effectively** during emergency situations and events.
- **Establish procedures for the restoration of electrical service in a systematic and efficient manner** by effectively utilizing COF's human and physical resources and, if necessary, by securing and utilizing outside resources.
- **Ensure that COF maintains compliance with the regulatory requirements** related to emergency operations and emergency response.

The plan is organized into the following sections:

#### **Section**

- (Section-1) Approval and Implementation
- (Section-2) Communications Plan
- (Section-3) Pre-Identified Supplies for Emergency Response Plan
- (Section-4) Staffing During Emergency Response Plan
- (Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure

#### **Annexes**

- Weather Emergency Annex
- Load Shed Annex
- Pandemic and Epidemic Annex
- Wildfire Annex
- Hurricane Annex
- Cyber Security Annex
- Physical Security Incident Annex

### **1.1.3 Applicability**

**The policies, procedure, and tasks contained in the Emergency Operations Plan (EOP), apply to all types of emergency events and situations that impact the COF electric system, including the system facilities and operations.**

The EOP is the document that guides the organization in the preparation phase, during system emergency events, and in the restoration and recovery phase of an event.

The Plan Administrator has overall responsibility for the implementation of the plan and will ensure that each area of the City that plays a role in the preparation and response to an emergency has input in the development of the EOP and has the required training and exposure to the EOP.

#### **1.1.4 Internal Training / Annual Drill**

**The City of Farmersville is committed to EOP training for COF utilities personnel. Training shall be conducted on a regular basis and include the appropriate materials for various departments and areas of the organization.**

- City of Farmersville shall review the EOP with all employees on an annual basis.
  - The training / review sessions for Electric Utility Operations personnel shall include a “table-top” exercise and a review of the current plan. The session shall likely be conducted in conjunction with a monthly safety meeting.
  - Following the training and annual drill, COF shall assess the effectiveness of the drill and modify its EOP as needed.
- The Plan Administrator shall coordinate with all COF managers and supervisors to determine the most effective manner to conduct a review with other COF departments.
- Regional governmental agencies / entities in the COF service area conduct emergency exercises on a regular (annual) basis. When possible, COF will participate in these exercises and coordinate with area entities on planning for emergency events.
- COF shall conduct a “debriefing” after each operational use of the EOP. These sessions include a review of the event and identify the successful aspects of the EOP as well as areas that may require improvement or additional procedures.

## **1.2 Plan Maintenance and Plan Responsibilities**

**The City Manager/Public Works Director is the Plan Administrator for the EOP. This role is central to the administration and implementation of the EOP.**

The responsibilities of this role / position include the following administrative duties and actions:

- Maintain the EOP and approve updates. Any changes and updates will also require approval of the City Manager/Public Works Director.
- Coordinate the systematic updates and modifications to the EOP as regulations change and evolve, as best practices and “lessons learned” from actual events and other utilities become available and as personnel and organizational changes occur at COF.
- Ensure the tasks identified in the EOP are completed and tracked.

The Plan Administrator has multiple responsibilities related to maintenance, accuracy, training, and overall effectiveness of the plan. Plan administration responsibilities are provided in this section.

- Ensure that the Emergency Operations Plan meets all requirements of PUCT Substantive Rule 25.53(h).
- Coordinate annual submittals to the PUCT, ERCOT and other agencies.
- Track changes to the EOP and determine if the changes are significant and warrant the filing of a new version of the Plan with PUCT, no later than 30-days after the change takes effect.
- Conduct a formal review of the EOP each year. This review shall occur following the annual table-top exercise, or as needed.
- Ensure that the emergency contact information is maintained and reported to the PUCT as required within 30-days of the change.
- Maintain a copy of the current EOP and make this available to PUCT staff upon request.

## **(Section-2) Communications Plan**

### **2.0 Purpose and Applicability**

To provide the communication guidelines, policies, procedures, and pre-developed content that City of Farmersville shall utilize in all types and levels of electric emergency events.

### **2.1 Administration / Initial Tasks**

Develop / Implement Emergency Operations Communications Plan (EOCP): COF shall develop and maintain a communications plan to guide COF during emergency events, including significant electric service outages.

The EOCP contemplates all types of system emergencies and provide the guidelines, policies, procedures, and pre-developed content that COF shall utilize to communicate with all external audiences and stakeholders. Additionally, the EOCP shall address COF's customer complaint handling procedures during an emergency event. The EOCP is summarized in this section of the EOP.

### **2.2 Annual Review / Ongoing Maintenance**

The EOCP shall be reviewed annually (or as needed) by the Plan Administrator and the Communications Coordinator to ensure that the information is current. The EOCP shall be maintained by the Communications Coordinator.

### **2.3 Content of the Emergency Operations Communications Plan**

The EOCP includes the following information regarding the strategies, policies, and procedures during an electric system emergency, including:

#### **2.3.1 Emergency Event Communication Strategies**

Key strategic elements of the plan are based on industry best practices along with lessons learned from past emergency events. Key Emergency Event Communication strategies are listed below:

- **Readiness and Activation:** COF Directors, Managers, Supervisors, and key staff will monitor potential emergency situations and conditions and activate appropriate levels of internal and external communication procedures.
- **Open and Timely Communication:** COF Directors, Managers, Supervisors, and key staff will share all relevant information regarding the preparation, operations, restorations and other relevant information with the Communications Coordinator, internal and external audiences, and stakeholders in a timely manner.
- **Engagement and Communication with Relevant Agencies and Entities:** The Communications Coordinator and the City Manager/Public Works Director will work closely and coordinate with local, regional, and State agencies and entities to ensure effective communications regarding outage and restoration conditions, status, and plans.
- **Ongoing and Effective Training:** COF has developed and shall implement a comprehensive Emergency Operations Plan training program for all COF personnel. This training can be customized to the various departments to ensure key EOP information is conveyed to the respective groups.
- **Emergency Operations Center (EOC) and Channels:** COF will establish in-person and/or virtual EOC to ensure event status and operational communications across all relevant COF departments and teams. As needed, COF will utilize video conferencing software to establish



a virtual EOC with regular briefings and meetings to share operational, logistical, communications, and coordination status with other entities and agencies.

### **2.3.2 Emergency Event Communication Policies**

- **Development and Maintenance of Emergency Operations Communication Plan:** COF shall develop and maintain a plan that contains communication guidelines, policies, procedures, and pre-developed content that COF shall utilize in all types and levels of emergency events.
- **Tracking and Coordination of External Communications:** During any declared emergency, the Communications Coordinator will be responsible for the coordination and tracking of all COF external communications. Communications Coordinator will coordinate closely with the City Manager/Public Works Director's Office to ensure all external press/media releases, interviews and associated communications contain accurate and updated information.
- **Primary Spokesperson(s):** The City Manager will direct and serve as the primary spokesperson(s) for the City. The City Manager/Public Works Director may delegate / designate other senior COF staff to prepare communications and / or make statements to COF's customers, the public, and the media (including social media).
- **COF Employee Communications with Media / External Communications:** Any COF employee contacted by the media should refer the contact to the Communications Coordinator (and designees). Unless a COF employee has been given specific authority to disclose information to the media, and/or present the city's official position, comment should not be provided. Any COF employee pressed by the media for information should be polite, but firm in their referral to the Communications Coordinator (and designees).
- **Pre-Developed Communications Pre-Scripted Content and Templates:** COF Communications Coordinator shall develop pre-scripted templates for news releases, social media posts and other media communications.

### **2.3.3 Handling Customer Complaints and Contacts:**

The procedures for addressing complaints, concerns, and inquiries from COF's customers is as follows:

- COF Customer Services shall make every effort to receive / answer all calls from customers including customers registering complaints, concerns, and asking questions regarding the emergency event and related information and updates regarding COF's restoration efforts and status.

### **2.3.4 Communicating with the Public:**

- The City Manager/Public Works Director will coordinate with the Communications Coordinator to provide official updates on COF's power restoration process and post this information on the COF website and appropriate social media outlets. These official status reports / updates will be posted as frequently as it is practical to do so.

### **2.3.5 Communicating with the Media:**

- Communications Coordinator (and designees) may notify local media and the public of preparations taken by to prepare for the event.
- In the period prior to a likely event, the Communications Coordinator (and designees) will assemble and review materials and brief staff / managers regarding basic procedures and the

types of messaging that could be provided during a pending event via standard and / or social media platforms.

- Communications Coordinator (and designees) will maintain media contact lists for local and regional media.
- Periodic updates will be provided to local and major media outlets in and around the COF service areas throughout the event. All local media outlets will be notified of new developments in their areas as they occur.
- Major media outlets including regional newspapers and radio stations will be provided daily updates on COF's power restoration process. COF will send updates often and promote information that is posted to COF's website and social media sites.
- The City Manager/Public Works Director will coordinate with the Communications Coordinator to provide official updates on COF's power restoration process and post this information on the COF website and other outlets. These official status reports / updates will be posted as restoration status changes.

#### **2.3.6 Communicating with Customers:**

- City Manager/Public Works Director shall designate personnel that are responsible for customer communications (that will be synchronized with any/all media communications prepared by the Communications Coordinator).
- City Manager/Public Works Director will coordinate with the Communications Coordinator to provide official updates on COF's power restoration process to customers and post this information on the COF website. These official status reports / updates will be posted daily or as frequently as it is practical to do so.
- Customer Services will provide additional status information in the same section of the COF website to inform customers (and media) of any additional restoration information.

#### **2.3.7 Communicating with the PUCT:**

- Upon request by PUCT staff during an activation of the State Operations Center (SOC) by the Texas Division of Emergency Management (TDEM), the City will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by PUCT staff.
- COF City Manager/Public Works Director will coordinate with the Communications Coordinator to provide official updates on COF's power restoration process and post this information on the COF website. These official status reports / updates will be posted daily or more frequently if possible. COF will inform the PUCT of this information source if requested.
- COF has provided PUCT with COF's contact information and will respond directly to any communications and requests from PUCT and / or OPUC.

#### **2.3.8 Communicating with the Office of Public Utility Counsel (OPUC):**

- Upon request by OPUC during an activation of the SOC by the TDEM, the City will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by OPUC.
- COF will maintain open channels of communication with PUCT and OPUC.

**2.3.9 Communicating with Local and State Governmental Entities, Officials, and (County) Emergency Operations Centers:**

- The City Manager/Public Works Director's Office and Communications Coordinator will work closely and coordinate with local, regional, and State agencies and entities to ensure effective communications regarding outage and restoration conditions, status, and plans.
- The City Manager/Public Works Director and Communications Coordinator or designees (including Incident Commander and other designated ICS personnel), will actively participate and coordinate with the following entities and groups:
  - Regional / County Emergency Managers;
  - State and local government agencies, including Texas Division of Emergency Management (TDEM), the Texas Public Utility Commission (PUCT), and regional utilities.
- As appropriate, coordinated communications will be developed and distributed in conjunction with these entities.

**2.3.10 ERCOT:**

- COF will maintain open channels of communication with COF's ERCOT Designated Transmission Operator, which is the entity that will communicate with ERCOT regarding any Firm Load Shed status.
- COF has provided ERCOT with COF's contact information and will respond to any and all communications and requests from ERCOT and / or the Transmission Operator.

**2.3.11 Critical Load Customers:**

- City Manager/Public Works Director, Communications Coordinator and Customer Services will direct Critical Load Customers to COF website and social media pages for relevant information.

**2.3.12 Internal Communications:**

- The Communications Coordinator (and designees) will keep COF personnel informed of outage updates and media communications.
- The Communications Coordinator will coordinate internal communications with the City Manager/Public Works Director and Incident Commander if designated during the entire period of any / all emergency restoration situations.

## **(Section-3) Pre-Identified Supplies for Emergency Response Plan**

### **3.0 Purpose and Applicability**

To provide guidelines for the management of materials, supplies and resources that COF may need during emergency events.

### **3.1 Administration / Initial Tasks**

Develop / Implement a Pre-Arranged Supply Plan: COF shall develop and maintain a Pre-Arranged Supply Plan that provides COF personnel (and contractors) with access to sufficient supplies to support emergency operations during all types and levels of emergency event(s).

### **3.2 Annual Review / Ongoing Maintenance**

The Pre-Arranged Supplies Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Pre-Arranged Supplies Plan shall be maintained by the City Manager/Public Works Director, Purchasing Coordinator, and management personnel.

### **3.3 Supplies and Resources Preparation**

3.3.1 Suppliers: COF procures materials and supplies from multiple vendors. In the period prior to a likely event, emergency supplies shall be checked and supplemented (if needed).

3.3.2 Advance Preparations Related to a Specific Approaching Event: Preparations for a known approaching storm or system event will be made to the extent possible. Examples would be major wind and lightning storms, rising water and flooding, tornados, and other events such as public health epidemic or pandemic events.

3.3.3 Location of Emergency Supplies: COF maintains inventories of electric distribution materials in the utility warehouses in the City of Farmersville. The COF City Manager/Public Works Director and Utility management staff are responsible for maintaining inventories of materials required for significant restorations and obtaining additional materials and supplies for major outages.

3.3.4 Fuel Supply: COF has arrangements with local bulk distributors of gasoline and diesel fuel. Bulk distributors, in turn agree to reserve fuel on behalf of COF, during Major (E-2) and/or Catastrophic (E-3) events.

3.3.5 Lodging/Food and Laundry: In a major event, the City Manager/Public Works Director's Office may designate a Logistics Officer to be responsible for locating / arranging lodging, meals, and laundry service for COF personnel incapable of returning home during Major (E-2) and/or Catastrophic (E-3) events and for contract support crews called upon to help in the restoration efforts.

### **3.4 Actions in a Major or Catastrophic Event**

- The pre-arranged supplies shall be accessed and utilized as needed.
- Depending on the level of event Utilities Management personnel shall manage the distribution of supplies to the appropriate Electric Utility operations personnel and contact material suppliers to coordinate the potential need for additional materials and supplies.
- In a large-scale outage with significant damage to overhead distribution facilities where additional materials and supplies are required, the COF Purchasing Coordinator and Utilities Management personnel shall manage and coordinate the procurement, delivery location and management of all materials and supplies.

## **(Section-4) Staffing During Emergency Response Plan**

### **4.0 Purpose and Applicability**

To provide the roles and assignments for COF personnel during severe weather events and other types of potential emergency situations. The roles listed below can be assigned and delegated by the City Manager/Public Works Director and/or the City Manager/Public Works Director's designee.

### **4.1 Administration / Initial Tasks**

Develop / Implement an Emergency Staffing Plan: COF shall develop and maintain a Staffing Plan for Electric Utility Emergency Response. This plan will focus on the command structure for different levels of emergency events that are based on the characteristics of the electric system outage and restoration timeframe.

### **4.2 Annual Review / Ongoing Maintenance**

The Emergency Staffing Plan shall be reviewed annually (or as needed) to ensure that the information is current. The City Manager/Public Works Director's Office shall review the ICS roles to ensure they include electric utility functional areas are integrated with other City ICS roles and functional areas.

### **4.3 Emergency Staffing Plan**

- COF will utilize the standard organizational structure for emergency events that are limited to electric utility service. The City Manager/Public Works Director will direct the Electric Department's management and response to the event. In a major or catastrophic event that impacts multiple utilities and/or are considered "City-wide" emergencies, the City will follow protocols to initiate the City Emergency Operations Center (EOC). EOC staffing will implement an Incident Command Structure (ICS) that includes standard ICS roles, responsibilities, and procedures.
- Some COF personnel may be asked to suspend normal job responsibilities and take on additional responsibilities and tasks. These assigned roles and duties will be made by the City Manager/Public Works Director or the City Manager/Public Works Director's Designee.
- Dispatchers work shifts will be coordinated by the City Manager/Public Works Director and management of the Dispatch staff.

### **4.4 Emergency Staffing Plan – Electric Utility ICS Roles**

1. Incident Commander
2. Operations / Restoration Officer
  - a. Damage Assessment Director
  - b. Restoration Director
  - c. Outside Crews Director
3. Logistics Officer
  - a. Purchasing Director
  - b. Warehouse/Materials Director
  - c. Fleet Services Director
  - d. Food and Lodging Director
  - e. Fuel Procurement

4. Administration / Finance Officer
  - a. Administration Director
  - b. Finance Director
5. Customer Services Officer
6. Information Technology Officer
  - a. Network Administrator
7. Communications Officer
  - a. Communications / Media Director
  - b. Key Account Director

#### **4.5 Work Schedules**

- Continuous Work Time of Less Than 24 Hours
  - Depending on the time of the day a storm/emergency occurs, service may be restored in less than 24 hours utilizing COF's Electric Utility personnel. The key to determining restoration time is the use of experienced personnel to perform assessment of the affected areas. Based on this information, the City Manager/Public Works Director will determine an approximate restoration time. If it is determined that work can be completed without working employees over 24 continuous hours (including regular shifts), COF's City Manager/Public Works Director may choose to proceed with restoration activities.
- Anticipated Continuous Work Time in Excess of 24 Hours
  - Restoration of service in excess of 24 continuous work hours should be accomplished by implementing a rotating schedule of not more than 16 hours on-duty and not less than 8 hours off duty: ideally 14 hours on and 10 hours off. The goal is to use the majority of the work force during daylight hours to maximize restoration efforts and safety.
  - COF Electric Utility personnel shall maintain an around-the-clock schedule, weather permitting, and safe work conditions. For public safety, the night schedule should be staffed with sufficient personnel to handle severe emergencies (wires down, arcing equipment, etc.).
  - Damage assessment should continue so that work is ready for those crews returning from rest.
  - Normally, shifts shall be 7:00am-7:00pm and 7:00pm-7:00am. However, the City Manager/Public Works Director will retain the flexibility to coordinate different standard shift times according to the situation, season, or other factors.

## **(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure**

### **5.0 Purpose and Applicability**

To maintain real-time awareness of the prevailing weather and of developing weather events, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, that may have an impact on COF's normal operations, and the policies and procedures related to declaring an emergency and activating the EOP.

### **5.1. Administration / Initial Tasks**

Develop / Implement a Weather-Related Hazards Identification Plan: COF shall develop and maintain connection to mission-critical weather resources, to include National Weather Service (NWS), National Oceanic and Atmospheric Administration (NOAA) and other national, regional, and local media sources to monitor weather forecasts and current information.

Weather-Related Hazards Identification Process: The City Manager/Public Works Director and management staff shall develop a process to monitor, and track developing weather events and provide information to the proper contacts within the organization.

### **5.2 Annual Review / Ongoing Maintenance**

The Weather-Related Hazards Identification Plan shall be reviewed annually (or as needed) to ensure that the information is current and that the process is operating effectively. The Weather-Related Hazards Identification Plan shall be maintained by the Utilities Operations Manager.

### **5.3 Pre-Event Tasks**

- COF maintains video screens and monitors weather information in the COF Operations / Dispatch work areas as well as in key offices and meeting rooms in each COF facility.
- COF monitors and reports weather / fire danger information to COF Electric Utility Operations personnel. Reporting shall be done via electronic communications (primary communications channel via email to management and supervisor group). Other communications may include text messages and / or video conference calls / meetings as appropriate.
- COF uses various internet/web-based sources to access weather information. Multiple COF management personnel and staff monitor available weather websites and other sources. The weather sites provide data on storm movement, strength, and possible severe weather, tornado, or winter storm/ ice scenarios.
- Storm and relevant weather information is shared via email(s) to COF managers and supervisors and if there is limited lead time, the COF City Manager/Public Works Director (or designee) shall make calls and send texts to management, supervisors, and electric utility personnel as needed.

### **5.4 Notes / Resources**

- National Weather Service (NWS), once known as the Weather Bureau, is a part of the National Oceanic and Atmospheric Administration (NOAA) of the United States government. NWS is tasked with providing forecasts, public warnings, and other products to organizations and the public for the purposes of protection, safety, and general information. This is done through a collection of national

and regional centers, and 122 local weather forecast offices (WFOs). As the NWS is a government agency, most of its products are in the public domain and available free of charge.

- National Oceanic and Atmospheric Administration (NOAA) is a scientific agency within the United States Department of Commerce focused on the conditions of the oceans and the atmosphere. NOAA warns of dangerous weather, charts seas and skies, guides the use and protection of ocean and coastal resources, and conducts research to improve understanding and stewardship of the environment.
- The following table provides links to various weather services resources:

<b>Weather Service / Information Resources</b>	
<b>ERCOT – Meteorologist Report</b>	<a href="http://www.ercot.com/about/weather">http://www.ercot.com/about/weather</a>
<b>NWS – 5-day Rain Forecast</b>	<a href="http://www.wpc.ncep.noaa.gov/qpf/day1-5.shtml">http://www.wpc.ncep.noaa.gov/qpf/day1-5.shtml</a>
<b>NWS – National Weather Service</b>	<a href="https://www.weather.gov">https://www.weather.gov</a>
<b>NWS – Current Radar</b>	<a href="https://radar.weather.gov">https://radar.weather.gov</a>
<b>NOAA – Storm Prediction (Tornadoes)</b>	<a href="http://www.spc.noaa.gov">http://www.spc.noaa.gov</a>

### **5.5 Emergency Levels Policy / Procedures – Electric Utility**

This section provides structure, procedures, and tasks related to COF’s Electric Utility’s response to all types of possible emergency events and incidents and gives the COF City Manager/Public Works Director or the City Manager/Public Works Director’s Designee, the responsibility and discretion to declare a situation, event, or incident as an “Emergency”.

- When a situation, event, or incident is deemed to be an emergency, COF Electric Utility shall utilize a standard organizational structure for lower-level emergency situations (see descriptions below) and will implement an Incident Management System (ICS) structure to coordinate activities and manage major and catastrophic level events. This shall ensure that there are clear roles and responsibilities for each emergency event.
- The City Manager/Public Works Director (or Incident Commander) is responsible for completing an “Emergency Declaration and Tracking Form” (EDT-Form). This form shall document the time, scope, and expected duration along with other key documentation of the event. If an emergency event changes state (e.g., from a “P” to an “E-1”; or from an “E-2” to an “E-3”), this form shall reflect these and other changes in status and relevant information regarding the emergency response.
- The designation of an emergency event or incident shall generally fall into the following types and levels of emergencies:

#### **1) Pre-Emergency Preparation (P)**

- a) COF conducts normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.
- b) Typically lasts up to 24 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.



- c) An Incident Commander may be designated depending on the potential impact of the storm or forecasted event. If designated, the Incident Commander will typically be the City Manager/Public Works Director or other utility management staff.

## **2) Significant Event(s) (E-1)**

- a) The emergency event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric service in one or more districts, with power being restored to all areas within 24 hours).
- b) An Incident Commander may be designated. If designated, the Incident Commander will typically be the City Manager/Public Works Director or other utility management staff. The Incident Commander shall determine if other ICS roles are required. If required, the Incident Commander shall identify the COF City Electric Department or other City personnel to fill all or some of the ICS roles (Operations/Restoration, Logistics, Finance/Administration, Member Services, Technology, and Communications).

## **3) Major Event(s) (E-2)**

- a) A segment of the organization has experienced a power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal field work.
- b) Major events are severe but not yet catastrophic. This type of emergency needs to be monitored closely to determine if, in fact, it will escalate to a catastrophic condition.
- c) Major events are expensive and can include problems like loss of critical components of the electric infrastructure such as substations, transmission assets, and large amounts of COF's distribution system. A major event could include loss of COF's ability to conduct business.
- d) An Incident Commander shall be designated by the City Manager/Public Works Director or City EOC. The Incident Commander shall identify the COF management and/or staff personnel to fill the ICS roles (Operations/Restoration, Logistics, Finance/Administration, Customer Services, Technology, and Communications). It is likely that 2 or more personnel will be required to fill each ICS role due to the extended nature of the emergency event.

## **4) Catastrophic Event(s) (E-3)**

- a) A Catastrophic Event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster; or the information technology center is lost due to system failure for an extended period.
- b) The organization must have systems in operation within 72 hours or experience significant economic loss.
- c) An Incident Commander shall be designated by the City Manager/Public Works Director or City EOC. The Incident Commander shall identify the COF management and/or staff personnel to fill the ICS roles (Operations/Restoration, Logistics, Finance/Administration, Customer Services, Technology, and Communications). It is likely that 2 or more personnel will be required to fill each ICS role due to the extended nature of the emergency event.

## **5) Recovery (R)**

- a) After an emergency event the organization shall require a period to return to normal operations.
- b) The Incident Commander shall work with the City Manager/Public Works Director and City Manager/Public Works Director's Office to organize the recovery tasks, reporting tasks, and other related operational and business actions required for the full recovery of the system and operations.



## **§25.53 EMERGENCY OPERATIONS PLAN ANNEXES**

## **(A) Weather Emergency Annex**

### **A.1 Purpose and Applicability**

To provide the procedures for COF personnel to respond to cold or hot weather emergency situations including a checklist for COF personnel to use during cold or hot weather emergency response to ensure necessary supplies and personnel are available through the weather emergency.

### **A.2 Administration / Initial Tasks**

Develop / Implement a Hot and Cold Weather Emergency EOP Annex (Weather Emergency Plan): COF shall develop and maintain a Weather Emergency Plan that provides the procedures and a checklist for COF personnel to implement to prepare for an imminent cold or hot weather event that has a probability of resulting in a system emergency event.

### **A.3 Annual Review / Ongoing Maintenance**

The City Manager/Public Works Director or designee shall conduct a review of the Weather Emergency Plan each year and maintain the Weather Emergency Plan.

### **A.4 Weather Emergency Procedures**

#### **A.4.1 Cold Weather Event Preparation Procedures (Checklist – Appendix A)**

Starting 48-72 hours prior to the forecasted arrival of severe cold weather conditions (freezing rain, snow, ice, winds, and extreme cold temperatures); COF Electric Utility personnel shall:

- Activate staffing plan to ensure Electric Utility Operations personnel are prepared and available for service during the anticipated timeframe of the cold weather event.
- Ice Storms typically are predicted with several days' notice as weather conditions develop. Weather will be monitored at the COF main office and Dispatch by television, weather radio, and internet as necessary.
- If an ice storm and / or severe winter weather is predicted:
  - Material stock will be checked, and additional material may be ordered for major pole and line replacement.
  - COF vehicles will be made ice storm ready with truck and tool inspections, fueling and de-icing materials, housekeeping including cleaning windshields and lighting, and additional stock of wire, splices, connectors, and fuses.
  - Additional windshield fluid will be maintained for use as needed.
  - Backup generators will be checked for fuel and operation for extended loss of power.
  - De-icer will be placed by the Street Department at strategic locations for application to sidewalks and parking areas at the main office and service center as required.
- COF Electric Department personnel and contract crews will be placed on notice to be available as needed during and after business hours.
- All crews will make up duffel bags with clothing required for working in extended cold weather work.

- Based on forecasted severity, The County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Public Power Association (TPPA), and additional contractors may be contacted prior to damages.
- During icy conditions normal line construction will cease and vehicles will be arranged so that crews and equipment will have a short response time to all areas of the system.
- Travel will be restricted to “as required”.
- Digger trucks will have additional poles loaded according to predicted severity.
- Contract crews must check in with the COF Operations as required if wishing to leave because of rain out.
- Contractors will inform the City Manager/Public Works Director of contact and equipment location information in case assistance is needed for restoration and repairs.
- Crews will be dispatched to assess any damage as soon as deemed safe.
- The City Manager/Public Works Director and individual field coordinator(s) will assess, group, coordinate, and relay the outage information to the dispatched personnel.
- Contractors may be dispatched as necessary to limit outage duration.
- GPS tracking may be used to monitor truck locations.
- Supporting equipment (bucket trucks, digger trucks, poles, and other material) may be dispatched as anticipated before actual need to limit outage duration.
- If declared a disaster area, The County Emergency Management Coordinator(s) and the Texas Division of Emergency Management (TDEM) Coordinators will be contacted.
- The Public Utility Commission must be contacted to report significant Interruption if over 20% of customers are affected.
- Engineering will review engineer load study on the system (if needed)
- Electric Department staff will prepare and ensure all crews / trucks are supplied; including:
  - Fuses
  - Long Sticks
  - Handlines
  - Check heaters in warehouse
  - Chainsaw gas, bar oil, and chains
  - De-icer for trucks
  - Contractors on standby
    - Overhead
    - Underground
  - Communication Department notified
    - Internal
    - External
  - Material availability
  - Fuel delivery
  - List of personnel to conduct field assessments

- Realtime account notification
- Critical Load Account notification coordinated with Customer Services
- Push latest map update
- ROW Contractor
  - Number of Crews
  - Point of contact for crews

#### **A.4.2 Hot Weather Event Preparation Procedures (Checklist – Appendix B)**

Starting 48-72 hours prior to the forecasted arrival of extreme hot weather conditions (extreme hot temperatures); COF Electric Operations personnel shall:

- Activate staffing plan to ensure Electric Utility Operations and Management personnel are prepared and available for service during the anticipated timeframe of the hot weather event.
- Extreme heat is typically predicted with several days' notice as weather conditions develop. Weather will be monitored at the COF main office and Dispatch by television, weather radio, and internet as necessary.
- If extreme heat is predicted:
  - Material stock will be checked, and additional material may be ordered.
  - COF vehicles will be made ready with truck and tool inspections.
  - Backup generators will be checked for fuel and operation for extended loss of power.
- COF Electric Utility personnel and contract crews will be placed on notice to be available as needed during and after business hours.
- All crews will make up duffel bags with clothing required for working in extended hot weather work.
- Based on forecasted severity, The County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Public Power Association (TPPA), and additional contractors may be contacted.
- Travel will be restricted to "as required".
- Contract crews must check in with the COF Operations as required if wishing to leave.
- Contractors will inform the City Manager/Public Works Director of contact and equipment location information in case assistance is needed for restoration and repairs.
- Crews will be dispatched to assess damage as soon as deemed safe.
- The City Manager/Public Works Director and individual field coordinator(s) will assess, group, coordinate, and relay the outage information to the dispatched personnel.
- Contractors may be dispatched as necessary to limit outage duration.
- GPS tracking may be used to monitor truck locations.
- Supporting equipment (bucket trucks, digger trucks, poles, and other material) may be dispatched as anticipated before actual need to limit outage duration.

- If declared a disaster area, The County Emergency Management Coordinator(s), and the Texas Division of Emergency Management (TDEM) Coordinators will be contacted.
- The Public Utility Commission must be contacted to report significant Interruption if over 20% of customers are affected.
  - Activate virtual meeting(s) 48-72 hours out from the projected storm impact to the system.
  - Review engineer load study on the system (if needed).
  - Field Crew Preparation – ensure all crews / trucks are supplied; including:
    - Fuses
    - Long Sticks
    - Handlines
    - Chainsaw gas, bar oil, and chains
    - Check ice machines
  - Contractors on standby
    - Overhead
    - Underground
  - Communication Department notified
    - Internal
    - External
  - Material availability
  - Fuel delivery
  - List of personnel to conduct field assessments
  - Realtime account notification
  - Critical Load Account notification with Customer Services
  - Push latest map update
  - ROW Contractor
    - Number of Crews
    - Point of contact for crews
  - Activate staffing plan to ensure Electric Utility Operations and management personnel are prepared and available for service during the anticipated timeframe of the hot weather event.

## **(B) Load Shed Annex**

### **B.1 Load Shed (Firm Load Shed)**

#### **B.1.1 Purpose and Applicability**

To provide the procedures for shedding load, managing rotating outages, and managing planned interruptions in the reduction of load during periods of generation capacity shortages and other calls for curtailments. This Annex also includes a Critical Loads Registry Plan and a Restoration Plan that are linked to load shed events.

#### **B.1.2 Administration / Initial Tasks**

Develop / Implement a Load Shed EOP Annex (Load Shed Plan): COF shall develop and maintain a Load Shed EOP Plan in conjunction with the ERCOT Guidelines and Protocols.

#### **B.1.3 Annual Review / Ongoing Maintenance**

The City Manager/Public Works Director or designee shall conduct a review of the EOP Load-Shedding / Curtailment Plan each year. The EOP Load-Shedding / Curtailment Plan shall be maintained by the City Manager/Public Works Director and be filed in designated Directory.

#### **B.1.4 Firm Load Shed Program Preparation and Testing**

- The City Manager/Public Works Director shall be responsible for coordinating activities with the COF Transmission Operator (TO) (if designated).
- The City Manager/Public Works Director shall coordinate with COF Electric Utility Engineering, Operations and Dispatch personnel to make them aware of possible tasks and issues related to load shedding events.
- The Communications Coordinator shall engage the elements of the Emergency Communications Plan which shall provide information to COF customers and the public.
- Customer Services shall communicate information regarding all levels of EEA to COF customers according to the COF Emergency Event Communications Plan. This includes guidelines and procedures for informing the customers / accounts listed in the COF Critical Loads Registry.

#### **B.1.5 Firm Load Shed (ERCOT EEA Level-3):**

- COF TO is Responsible for Firm Load Shed on behalf of the City, based on the City's designation of COF TO the ERCOT Transmission Operator (TO) for the City. COF TO has obligations and responsibilities to ERCOT based on the TO's load share of ERCOT.
- COF TO periodically reviews loading on identified feeders to determine the total COF TO load shed capability.
- The City Manager/Public Works Director is responsible for maintaining the COF feeders which are on the curtailment list. As part of the Annual Critical Loads Review, the City Manager/Public Works Director shall also review the Curtailment List to be sure that there are no natural gas facilities / Industrial Critical Load accounts being fed from the designated distribution feeders.
- The City Manager/Public Works Director is the custodian of the COF Load Shed List and shall provide COF TO updates as needed and will review the list provided by COF TO.



#### **B.1.6 Load Shed Program – Event Information**

- In an ERCOT EEA event, COF City Manager/Public Works Director is responsible for monitoring information and communications from ERCOT and COF TO.
- As EEA levels move from EEA Level-1 to EEA Level-2, COF shall take appropriate actions to prepare for the possible EEA Level-3, which is the level where ERCOT calls for Transmission Operators to initiate load shed, also referred to as “rolling blackouts”.
- COF Electric Utility personnel shall remain on stand-by, should COF TO lose SCADA control and request assistance to manually open or reclose circuit breakers at the substation location. These field operations tasks can occur only with explicit instructions from COF TO.

#### **B.1.7 During Event Tasks**

- The City Manager/Public Works Director shall be responsible for the following functions:
  - Direct COF Electric Utility personnel to immediately suspend their work, make their job site safe, and wait for instructions.
  - Alert COF Communications Coordinator who will provide Customer Services scripts and talking points for customer phone calls.
  - Direct appropriate COF personnel to reduce COF load by starting standby generators and turning off low priority loads.
  - Providing the Communications Coordinator with information to disseminate to COF personnel, City customers, and the news media.
- ERCOT and COF TO can initiate a load shedding operation with little warning for events that are outside the COF system. All COF Electric Department personnel should be ready to participate in assigned service restoration activities and tasks.

#### **B.1.8 Load Shed Program – Post Event Information**

- After an event, the City Manager/Public Works Director and management staff shall review logs and communications records and provide such records to COF TO and/or ERCOT as requested.
- COF considers load curtailments not directed or initiated by ERCOT and COF TO to be an internal COF operation that is managed as a normal business procedure.
- COF does not intentionally curtail customer load for a local emergency, other than after major storms to eliminate unsafe conditions.

### **B.2 Restoration Plan and Priorities**

#### **B.2.1 Purpose and Applicability**

**To provide the guidelines, policies, and procedures that COF shall utilize in system restoration activities, including restoration following a Firm Load Shed event.**

#### **B.2.2 Administration / Initial Tasks**

Develop / Implement a Restoration Priorities Plan as part of the EOP Load Shed Annex: COF shall develop and maintain a Restoration Priorities Plan that includes restoration priorities and procedures. The City Manager/Public Works Director and management staff develops and maintains

the Restoration Priorities Plan.

### **B.2.3 Annual Review / Ongoing Maintenance**

The City Manager/Public Works Director and management staff shall conduct a review of the Restoration Priorities Plan each year. This review shall occur prior to the annual table-top exercise, or as needed. The Restoration Priorities Plan shall be reviewed as necessary or at a minimum, annually.

### **B.2.4 Restoration Priorities and Process**

- Following a Firm Load Shed event (EEA Level-3) COF will track the restoration of service to breakers / feeders that were tripped during the load shed event.
- In the scenario that a feeder is not restored, due to cold-load pickup or other factors, COF may dispatch personnel to restore the circuit by sectionalizing or other methods to restore service.
- The priority of COF in restoring service shall be to locations involving electric service to critical loads, including to gas pipelines and infrastructure serving generation facilities along with hospitals, nursing homes, and other locations involving community health and safety.
- In addition to priorities concerning community health and safety, crews shall be assigned to defined areas. Generally, crews shall concentrate on a given feeder, working to the end or to a sectionalizing point, and then returning to restore service on single phase lines or taps off the feeder.
- Restorations shall be done systematically, avoiding pressure from individuals for special attention. However, one or more crews may be assigned to locations where special hazards exist or where especially critical loads require immediate attention. When not on special assignments, these crews may be used to repair individual services.
- No crew shall be sent to work in an area where a known biohazard or terrorist act has occurred until clearance has been granted by the city police department or county sheriff's department in the affected area.

## **B.3 Critical Load Registration**

### **B.3.1 Purpose and Applicability**

**To provide guidelines to help determine, prioritize, and manage classes of customers to whom electric service is essential to life, health, public services, and safety and who shall be given priority, to the degree practicable, in restoration activities.**

### **B.3.2 Initial Tasks**

Develop / Implement a Critical Loads Plan as part of the EOP Load Shed Annex: COF shall maintain an EOP Annex that describes and provides information on the City's Critical Load Registry. The EOP Critical Load Plan shall include information on several types / categories of critical load accounts that have proved information for the Critical Load Registry.

### **B.3.3 Annual Review / Ongoing Maintenance**

The Critical Load Plan and Registry process shall be reviewed annually (or as needed) to ensure that the enrollment / registration process is effective, and the information Critical Load registry is

accurate. The EOP Plan Administrator (the City Manager/Public Works Director) shall periodically review Critical Loads registry (database) and implement procedures to ensure the information is accurate and current.

#### **B.3.4 Critical Loads Actions**

- Registry Maintenance: The registry is updated in an ongoing manner, with an application section provided on the COF website and forms available for customers that request a hard-copy form.
- Training: COF staff shall receive annual training on all aspects of communications, tracking and services to Critical Loads customers.
- Registry Use: Prior to a planned outage or an anticipated event, COF shall attempt to notify appropriate categories of registry customers by phone, text message or other means to provide information regarding the outage or event. If communication service is not available, COF shall attempt to notify critical loads through other channels.
- Customer Information: All COF customers shall be provided with information related to eligibility to be on the COF Critical Load Registry, including the Critical Care Residential Customer and Chronic Condition Residential Customer lists.
  - Customer Services shall notify each residential applicant for service of the right to apply for Critical Care Residential Customer or Chronic Condition Residential Customer designation. This notice to an applicant for residential service shall be included on the COF website and provided in the new customer information package.
  - COF shall provide information about Critical Care Residential Customer, Chronic Condition Residential Customer, Critical Load Public Safety and Critical Load Industrial designations on the COF website.
  - COF shall provide a bill insert / letter to all customers periodically (on an annual basis) in accordance with Senate Bill-3 requirement.
  - Upon a Customer's request, COF shall provide to the Customer the link to the application form for Critical Care Residential Customer and Chronic Condition Residential Customer designation on the COF website or send a hard copy form to the customer if requested. This application and description shall be included in the "Customer Information" section of the COF website.

#### **B.3.5 Definitions**

- Critical Load Public Safety Customer: A customer for whom electric service is considered crucial for the protection or maintenance of public safety, including but not limited to hospitals, police stations, fire stations, and critical water and wastewater facilities.
- Critical Load Industrial Customer: An industrial customer, for whom an interruption or suspension of electric service shall create a dangerous or life-threatening condition on the retail Customer's premises, is a "Critical Load Industrial Customer." This category includes critical gas pipeline infrastructure accounts.
- Chronic Condition Residential Customer: A residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to

prevent the impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition. If that serious medical condition is diagnosed or re-diagnosed by a physician as a life-long condition, the designation is effective under this section for one year or until such time as the person with the medical condition no longer resides in the home.

- Critical Care Residential Customer: A residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or re-designation is effective for two years under this section.
- COF maintains a Critical Load Registry. This registry informs COF's Operations / Restoration team about certain accounts that are deemed "priority" in terms of restoration planning. Restoration Account / Load priorities include:
  - Gas pipeline facilities and loads (designated as critical loads)
  - Law Enforcement and Fire Department/EMS facilities
  - Hospitals and health care facilities
  - Water / Wastewater Facilities
  - Designated Shelters / Schools
  - FAA Facilities
  - Industrial Critical Load Customers
- COF will make every effort to communicate with Critical Load customers in advance of planned outages and in advance of anticipated and predictable weather emergency or other anticipated system emergency events. Information is posted to the COF website and social media pages.
- COF will coordinate with COF TO regarding the types of Critical Load accounts that should be exempted from the COF TO Firm Load Shed program, by excluding feeders with accounts that COF TO deems as Critical Loads in the context of Firm Load Shed.

## **(C) Pandemic and Epidemic Annex**

### **C.1 Purpose and Applicability**

**Provide guidelines and procedures to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic event and to generally prepare COF for the possibility of a pandemic or epidemic.**

### **C.2 Administration / Initial Tasks**

Develop / Implement a Pandemic EOP Annex (Pandemic and Epidemic Plan): COF shall develop and maintain a Pandemic and Epidemic EOP Plan that shall provide the following:

- Education of employees about a possible pandemic and its potential impacts on COF's business operations;
- Reasonable measures to mitigate the impact of a pandemic and/or epidemic on COF and its employees;
- Information regarding the promotion of employee wellness and minimize opportunities for employees to be exposed to pathogens while at COF.

### **C.3 Annual Review / Ongoing Maintenance**

The City Manager/Public Works Director's Office shall conduct a review of the Pandemic & Epidemic Plan when changes are deemed necessary, but at a minimum annually.

#### **C.3.1 Preparation for a Pandemic or Epidemic**

- Develop / Implement a Pandemic and Epidemic Plan: COF shall develop and maintain a Pandemic and Epidemic Plan that addresses the policies and procedures that COF shall utilize in all types and levels of pandemic event(s). The City Manager/Public Works Director's Office will develop and maintain a Pandemic & Epidemic Plan.
- Operations and Business Continuity: It shall be important to monitor the status and changes to any pandemic/epidemic or potential pandemic/epidemic situation and provide accurate and timely information distribution to employees, customers, and the public before and during the event. COF standard operations and associated policies may need to be revised to minimize risks associated with spread of a virus / contagion.

#### **C.3.2 Pre-Event Tasks**

- In the period prior to a likely event, a checklist of items should be considered when developing departmental business continuity plans for a pandemic/epidemic.
- The City Manager/Public Works Director's Office shall monitor information from federal, State and Local government agencies including the Centers for Disease Control (CDC) for notification of pandemic/epidemic activity. Determining the existence of a pandemic/epidemic condition shall involve the federal, state, and local health officials. Reports of verified infections, severity of symptoms, and location and percentage of population affected are statistics that shall be available from health officials as the situation develops.
- COF shall go into a Pandemic / Epidemic Alert Condition based on evaluation of the situation from CDC and other information from state and local health officials.

- A significant increase in the level of contagious disease activity would be reported to COF managers (and the Incident Commander if ICS is deployed), which would then be responsible for determining if specific action related to the activation of a pandemic/epidemic response is required for their department.

#### **C.4 Policies and Procedures During an Active Pandemic/Epidemic Situation**

- COF shall monitor and implement all federal, state, and local directives regarding a pandemic/epidemic. These directives may include:
  - Facial covering requirements for employees and public / customers in COF facilities
  - Office / lobby closures
  - Suspension of in-person meetings
  - Reduction or elimination of business travel
- Education of employees about a possible pandemic/epidemic and its possible impacts on the City's business operations;
- Reasonable measures to mitigate the impact of a pandemic/epidemic on the city and its employees;
- Specific procedures and policies for responding to a pandemic/epidemic;
- Promotion of employee wellness and minimize opportunities or employees to be exposed to the disease while at the city.
- Altered COF office hours, accessibility, staggered work shifts and locations, and other measures may be implemented to address safety for employees, customers, and the public.
- The standard job functions of engineering, operations, dispatching, administration, information technology (IT), warehousing and accounting have identified and prioritized key employees and back-ups for normal operations and their modified job responsibilities under a pandemic/epidemic condition.
- Efforts shall be made to educate employees about all possible contagions, how these contagions spread, and how COF is preparing for these types of potential situations.
- Educational and informational messages shall include the following:
  - Do not report to work if sick or exhibiting any symptoms or conditions identified by the Centers for Disease Control (CDC).
  - Do not return to work until all symptoms have cleared and all return requirements have been met.
  - Limit face-to-face meetings and practice social distancing.
  - Limit travel especially via public transportation.
- COF shall communicate changes in policy and/or practices in a Pandemic/Epidemic event.
- COF may suspend face-to-face meetings and non-critical business travel.
- Employees shall be encouraged to obtain vaccinations (including annual flu shots).

- COF shall encourage and adopt sanitary practices in a Pandemic/Epidemic event. COF shall maintain supplies to support a sanitary environment and supplies shall be kept on hand and deployed, as necessary to include:
  - Hand sanitizer
  - Disinfectant spray
  - Rubber gloves
  - Masks
  - Alcohol-based hand sanitizer in all common areas (restrooms, break rooms, conference rooms, and at all meetings where food and drink are served).
  - Disinfectant spray in all restrooms.
  - Facial tissues in all meeting rooms and break rooms.
  - Brief cleaning crews on disinfecting techniques.

### **C.5 Business Continuity**

- City Department Directors and Managers shall be asked to re-examine their critical business process plans to determine if changes are necessary to cover a contagious disease pandemic/epidemic.
  - Are employees within the department and/or division cross-trained in job functions related to critical business processes?
  - Could the department continue to perform its critical business processes with a 40-50% employee absentee rate?
  - Which employees' job functions could be performed from home?
  - Which of those employees are equipped to work from home (home computer, Internet access, etc.)?
- The City Information Technology (IT) Director may develop plans for a wide deployment of software and services during a pandemic or epidemic to support a number of "Work from Home" employees.

### **C.6 Post Event Tasks**

- Conduct thorough event critique throughout the period of the pandemic / epidemic. If the pandemic / epidemic lasts for a prolonged period (not just a typical flu season) COF shall schedule regular review of measures, business continuity policies, and other applicable business and safety issues.
- Participate in joint public agency review sessions following event to identify areas for improvement and share lessons learned.
- Review and modify response and operations plans based on after action findings.

### **C.7 Resources**

- Definition-Pandemic: A pandemic event is an epidemic of infectious disease that has spread through human populations across a large region. Pandemics can create a situation that reduces the business work force by up to 50% for a significantly long duration.
- Definition Epidemic: A widespread occurrence of an infectious disease in a community at a particular time.
- The Centers for Disease Control (CDC) website: [www.cdc.gov/](http://www.cdc.gov/)

## **(D) Wildfire Annex**

### **D.1 Purpose and Applicability**

**To provide the guidelines, procedures and best practices related to wildfire mitigation and document COF's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery.**

### **D.2 Administration / Initial Tasks**

Develop / Implement a Wildfire Mitigation Plan: COF shall develop and maintain a Wildfire Mitigation Plan that shall address the wildfire prevention, policies, and procedures that COF shall utilize in all types and levels of emergency event(s).

### **D.3 Annual Review / Ongoing Maintenance**

The Wildfire Mitigation Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Wildfire Mitigation Plan shall be maintained by the City Manager/Public Works Director.

### **D.4 Mitigation Actions**

- During periods of drought and high fire danger, COF may reach out to customers and first responders throughout its service territory to inform and educate them on electrical safety and share information regarding wildfire prevention and mitigation.
- During periods of drought and high fire danger, COF may conduct electrical safety training for first responders including law enforcement agencies, fire departments, public works, and transportation agencies.
- COF may participate in annual joint exercises that include external partners from the first responder community and the emergency management community to enhance preparedness and prevention efforts.
- COF may meet with local, state, and federal agencies and jurisdictions to share fire prevention plans and strategize for the coming year.
- COF operates and maintains a Vegetation Management Program that is in accordance with best practices including:
  - Trimming trees away from power lines to eliminate the possibility of arcing which can start fires beneath the line.
  - Right-of-way assessment by internal and external Arborists.
  - Identification of Hazard Trees to be removed immediately.
  - Adhering to regulatory clearance requirements.
- Maintenance inspections of COF distribution system may include the following:
  - Ground line pole inspections
  - Document patrol and inspection activity
  - Identify wildfire high threat zones
  - Repair and/or replacement of damaged facilities or equipment that can be a source of arcing which can start fires beneath the line.



- COF monitors Severe Weather Information (see Severe Weather Monitoring section in the EOP). This includes monitoring days and periods of high fire danger, red flag warnings and other related weather information. This information is available from numerous sources.
- COF monitors the status related to wildfire conditions including TFS fire index ratings of Extreme or Very High; US Forest Service Fire Danger Class Low to Extreme and the National Weather Service (NWS) Red Flag warnings and alerts. COF also monitors the Texas A&M Forest Service wildfire risk assessment portal.
- COF Fire Department and Communications Coordinator are responsible for the dissemination of this meteorological and fire threat information to employees and contractors within its service territory to ensure they are informed of critical conditions that may impact the operation of the COF electrical delivery system.
- During periods of high fire risk, COF shall perform a thorough review of current electric planning, operations, design, and construction practices to reduce and if needed, to eliminate certain risks.

### Responses to Fire Events

- Coordinate with local entities, support firefighting efforts as requested.
- Provide requested personnel to work directly with fire suppression personnel to identify potential hazards.
- De-energize circuits in areas of active fire situations.

### Post-Incident Recovery

- Conduct thorough post event critique within 2-weeks after a fire related incident and participate in joint public agency review sessions following event to identify areas for improvement and share lessons learned.
- Review and modify response and operations plans based on after action findings. Additional clearing of hazardous, burned, or damaged vegetation in recovery zone. Identify, repair/replace damaged equipment. Cleaning of conductors and insulators for fire retardant and particulate matter.
- The following table provides links to various Wildfire Services resources:

Wildfire Services / Information Resources	
Texas Forest Service (Advisories)	<a href="https://tfsweb.tamu.edu/CurrentSituation/">https://tfsweb.tamu.edu/CurrentSituation/</a>
Texas Forest Service (wildfire map)	<a href="https://public.tfswildfires.com/">https://public.tfswildfires.com/</a>
NWS Fire Weather Outlook	<a href="https://www.spc.noaa.gov/products/fire_wx/">https://www.spc.noaa.gov/products/fire_wx/</a>
NOAA – Current Drought Conditions	<a href="https://www.drought.gov/">https://www.drought.gov/</a>

## **(E) Hurricane Annex**

### **E.1 Applicability**

The Public Utility Commission EOP Rule (Section 25.53) requires Municipally Owned Utilities (MOU's) to include a Hurricane Plan if its facilities (service area) is located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management (TDEM). COF's services area and facilities are not within a "Hurricane Evacuation Zone"; therefore, COF has not included a Hurricane Annex in COF's EOP.

#### **Texas Hurricane Evacuation Study (HES) Areas**

The Texas coast is divided into five areas for storm-surge vulnerability analysis. These areas, indicated in the table below, do not correspond to Texas disaster district boundaries.<sup>6</sup>

<b>Study Area</b>	<b>Counties</b>
<b>Sabine Lake</b>	Chambers*, Hardin, Jasper, Jefferson, Liberty, Newton, Orange
<b>Houston-Galveston</b>	Brazoria, Galveston, Harris
<b>Matagorda Bay</b>	Calhoun, Jackson, Matagorda*, Victoria
<b>Costal Bend</b>	Aransas, Kenedy, Kleberg, Nueces, Refugio, San Patricio
<b>Rio Grande Valley (Laguna Madre)</b>	Cameron, Hidalgo,** Willacy

Evacuation clearance time is the amount of time it takes to safely clear all evacuating traffic to inland points of safety. Hurricane Evacuation Studies (HES) provide planning assumptions such as evacuation clearance times for the population within designated hurricane evacuation zones. Clearance times vary, depending upon the evacuating location, storm scenario, tourist/seasonal occupancy and other factors.

Currently evacuation zones in Texas are defined by zip code, roads, jurisdictional boundaries or storm-surge projections.

## **(F) Cyber Security Annex**

### **F.1 Purpose and Applicability**

To provide the guidelines, procedures and best practices related to cyber security for the COF electric distribution system.

### **F.2 Administration / Initial Tasks**

Develop / Implement a Cyber Security EOP Annex (Cyber Security Plan): COF shall develop and maintain a Cyber Security Plan that shall address the prevention, policies, and procedures that COF shall utilize to protect the distribution system and respond to emergency events and situations.

### **F.3 Annual Review / Ongoing Maintenance**

The Cyber Security Plan (CSP) shall be reviewed annually (or as needed) to ensure that the information is current. The Cyber Security Plan shall be maintained by the Information Technology Director.

### **F.4 Cyber Security Policies and Procedures**

#### F. 4.1 Overview

Cyber threats are a potential source of emergency conditions at COF (and the utility sector in general). The EOP Administrator and IT Director will ensure that COF's Cyber Security Plan incorporates policies and procedures related to Emergency Operations for the COF Electric Utility.

COF will develop and maintain a Cyber Security Program to reduce the probability of a cyber-attack that impacts COF's Electric Utility operations, COF customer's information or any other aspect of COF's overall security. COF will have a plan to adequately protect Information Technology assets, sensitive data, and customer data. The EOP Administrator will coordinate with the IT Director to ensure the technology and controls are in place to maintain the security of its systems and data:

- Use of company policies about the use of computers, Internet, offsite CDs and other forms of data storage.
- Maintain the readiness of onsite Firewalls and protected IP addressing.
- Maintaining the security of the password system and controlling the access of the network administration.
- Performing daily backups of computer data, both network server and consumer information system.
- Maintaining a set of current back-ups offsite in a secured location. These are updated daily.
- Maintaining current anti-virus software and checks.
- Including cybersecurity in the procurement process.

The purpose of this policy is to ensure that COF technology assets are protected against all internal, external, deliberate, and accidental threats. Information, in all its forms, written, spoken, recorded electronically, or printed, will be protected from accidental or intentional unauthorized modification, or destruction throughout its life cycle. Policies and Procedures are established and shall be administered to protect City technology systems and data, customer financial and protected

information, and City data acquisition and control systems (SCADA) across the enterprise.

#### F.4.2 Scope

All employees, contractors, consultants, temporary and other workers at COF and its subsidiaries must adhere to all policies and procedures authorized and approved under this program. This applies to City data sets and technology equipment that is owned, operated, or leased by COF. The CSP describe the technology and information assets that must be protected and identifies many of the threats to those assets. The equipment, software, and storage medium used to process, store, and transmit information will be protected by appropriate controls.

#### F.4.3 Policy

The policies and procedures will ensure that:

- Sensitive, protected, and/or privileged Information and technology systems will be safeguarded against any unauthorized access.
- Confidentiality of sensitive, protected, and/or privileged information will be assured.
- Integrity of information will be maintained.
- Availability of information for business purposes will be maintained.
- Legislative and regulatory requirements will be met.
- Business continuity and disaster recovery plans will be developed, maintained, and tested bi-annually.
- All COF employees will be provided information security and awareness training on a regular basis.
- Any actual or suspected information security breaches will be reported to the IT Director. All breaches will be investigated thoroughly and logged.
- Policies and procedures have been established to support this program, including appropriate controls and continuity plans.
- Business requirements for availability of information systems will be met.

#### F.4.4 Cyber Security Tools

COF has incorporated updated policies, procedures, training and monitoring capabilities in recent years to address threats from cyber-attacks on the city's IT systems. This includes virus protection software and an employee training program targeted on educating staff on the various types of cyber-attacks and the techniques employed to gain access to critical data and systems. The IT Department performs frequent monitoring of systems including network scans to identify potential threats and mitigate damage that could occur from a successful attack. Protocols for offsite storage of data, backup equipment, and recovery plans are also in place.

## **(G) Physical Security Incident Annex**

### **G.1 Purpose and Applicability**

To provide the guidelines, procedures and best practices related to physical security for the COF electric distribution system.

### **G.2 Administration / Initial Tasks**

Develop / Implement a Physical Security EOP Annex (Physical Security Plan): COF shall develop and maintain a Physical Security Plan that shall address the prevention, policies, and procedures that COF shall utilize to protect the COF office complex, substations, system facilities and respond to emergency events and situations. To provide guidelines and procedures for gaining appropriate access to secured office buildings, plant facilities and electric substations and to enhance personal safety for all City personnel, contractors, visitors, and customers who work or conduct business at a City and/or Electric Utility office.

### **G.3 Annual Review / Ongoing Maintenance**

The Physical Security Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Physical Security Plan shall be maintained by the City Manager/Public Works Director's Office or designee.

### **G.4 Physical Security Guidelines**

- Guidelines / Content:
  - All secured buildings and substations will be equipped with padlocks or electronic access restriction on each outside door and each gate.
  - All City personnel and approved contractors will be provided with keys or other means to gain access to secured office buildings, facilities, and substations, in conjunction with their job duties.
  - All other visitors to the city and/or Electric Utility are directed to enter through the designated main office entrance.
- Procedures:
  - Secured access to buildings and substations:
    - All secured entrance doors and secured gates will be kept secure so that access is only available by authorized personnel.
    - Any entrances not secured properly will be reported immediately.
    - Substations are secured with a perimeter fence and locked gate. Control houses inside the substation are secured with padlock as well. Keys are issued to employees or approved contractors by signing request form prior to being issued a set of keys
  - Visitors:
    - Visitors or contractors without approved access should be directed to the designated main entrance of the appropriate building.
    - Visitors to area offices will be directed to the main lobby entrance.
  - Surveillance System
    - COF offices including Electric Utility office have alarm systems monitored 24/7.
    - Staff, Visitors, and Contractors who require access to substations must notify COF.

# **Appendix A**

## **Cold Weather Checklist**

# COLD WEATHER EVENT PREPARATION CHECKLIST

*Starting 48-72 hours prior to the forecasted arrival of severe cold weather conditions  
(freezing rain, snow, ice, winds, and extreme cold temperatures)*

## Electric Utility Personnel Shall:

- ☐ **Activate the Electric Emergency Operations Plan** & Review Section 5 - Weather Related Hazards Identification Plan and Annex A - Weather Emergency Annex.
- ☐ **(Based on forecasted severity) – Contact County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Public Power Association (TPPA).**
- ☐ **Monitor weather forecasts / information** at Main Office and Dispatch/Operations by television, weather radio, and Internet as necessary.
- ☐ **Activate staffing plan** to ensure operations personnel are prepared and available for service during the anticipated time-frame of the cold weather event. Electric Department and other emergency response personnel will be placed on notice to be available as needed during and after business hours.
- ☐ **Crews will prepare duffel bags** with clothing required for working in extended cold weather environment.
- ☐ **Contact and notice contractors** (line crews and ROW contractors) to assess outside resource availability and place on notice to be available as needed during and after business hours.
- ☐ **Check material stock** - order additional material as needed for truck stock, distribution system pole and line repair and replacement.
- ☐ **Electric Department staff** will prepare and ensure all crews / trucks are supplied; including:
  - Fuses
  - Long Sticks
  - Handlines
  - Chainsaw gas, bar oil, and chains
  - De-icer for trucks
- ☐ **Make vehicles ice storm /outage ready** – conduct truck and tool inspections, check fuel levels and de-icing materials, housekeeping including cleaning windshields and lighting, and additional stock of wire, splices, connectors, and fuses.
- ☐ **Prepare trucks and trailers with additional poles** if appropriate based on predicted conditions.
- ☐ **Appropriate utility personnel shall**
  - Identify Public Safety and Industrial Critical Load accounts and coordinate notification of residential accounts with Customer Service/Billing
  - Arrange for fuel delivery / fuel supply
  - Arrange for food and overnight stays for on duty personnel
  - Create list of personnel to conduct field assessments
  - Check heaters in warehouse
- ☐ **Check generators for fuel and operation** for extended loss of power.
- ☐ **During icy conditions normal line construction will cease**
  - Vehicles and personnel may be staged so that crews and equipment will have a shorter response time to all areas of the system.
- ☐ **Travel will be restricted** to “as required”.
- ☐ **Crews / personnel will be dispatched to assess damage as soon as deemed safe** and relay outage information to the dispatched personnel.
- ☐ **Contact the Public Utility Commission** to report a significant Interruption if over 20% of customers are affected

# **Appendix B**

## **Hot Weather Checklist**



# EXTREME HOT WEATHER EVENT PREPARATION CHECKLIST

***Starting 48-72 hours prior to the forecasted arrival of extreme hot weather conditions  
(NWS Extreme Heat / Heat Index Warnings)***

## **Electric Utility Personnel Shall:**

- ☐ **Activate the Electric Emergency Operations Plan** & Review Section 5 - Weather Related Hazards Identification Plan and Annex A - Weather Emergency Annex.
- ☐ **(Based on forecasted severity) – Contact County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Public Power Association (TPPA).**
- ☐ **Monitor weather forecasts / information** at Main Office and Dispatch/Operations by television, weather radio, and Internet as necessary.
- ☐ **Activate staffing plan** to ensure operations personnel are prepared and available for service during the anticipated time-frame of the extreme hot weather event. Electric Department and other emergency response personnel will be placed on notice to be available as needed during and after business hours.
- ☐ **Crews will prepare duffel bags** with clothing appropriate for working in extended hot weather environment.
- ☐ **Contact and notice contractors** (line crews and ROW contractors) to assess outside resource availability and place on notice to be available as needed during and after business hours.
- ☐ **Check material stock** - order additional material as needed for truck stock, distribution system pole and line repair and replacement.
- ☐ **Electric Department staff** will prepare and ensure all crews / trucks are supplied; including:
  - Fuses
  - Long Sticks
  - Handlines
  - Chainsaw gas, bar oil, and chains
- ☐ **Make vehicles outage ready** – conduct truck and tool inspections, check fuel levels and housekeeping including cleaning windshields and lighting, and additional stock of wire, splices, connectors, and fuses.
- ☐ **Prepare trucks and trailers with additional poles** if appropriate based on predicted conditions.
- ☐ **Appropriate utility personnel shall**
  - Identify Public Safety and Industrial Critical Load accounts and coordinate notification of residential accounts with Customer Service/Billing
  - Arrange for fuel delivery / fuel supply
  - Create list of personnel to conduct field assessments
- ☐ **Check generators for fuel and operation** for extended loss of power.
- ☐ **Stock extra water coolers and bottled water.**
- ☐ **Check ice machines** and/or make arrangements for ice storage and availability.
- ☐ **During extreme heat conditions normal line construction will cease**
  - Vehicles and personnel may be staged so that crews and equipment will have a shorter response time to all areas of the system.
- ☐ **Crews / personnel will be dispatched to assess damage** as soon as deemed safe and relay outage information to the dispatched personnel.
- ☐ **Travel will be restricted** to “as required”.
- ☐ **Contact the Public Utility Commission** to report a significant Interruption if over 20% of customers are affected.