

Application No.: A.25-06-017
Exhibit No.: LIB-23



(U 933-E)

Mountain View Fire Cost Recovery Application

Exhibit LIB-23

Liberty PSPS Emergency Response Playbook

PUBLIC

Emergency Response PSPS Playbook

1. Purpose

1.1 Liberty Utilities (LU) utilizes common emergency response protocols and follows a recognized incident management system described in the LU Emergency Management Plan (EMP). The EMP employs an all-hazards approach that includes responses to a range of possible natural disasters and human-caused situations. Response actions described in the EMP apply to incidents that:

- Affect or threaten service in a significant part of the company's service territory
- Affect or threaten service to a significant percentage of LU's customers
- Require system-wide coordination, including significant involvement by various support departments.

1.2 Threats include floods, storms, earthquakes, fires, and extreme wildfire threat conditions. The LU Public Safety Power Shut off (PSPS) Playbook, is intended to assist LU personnel with safe, efficient and coordinated responses to extreme wildfire threat conditions up to and including a PSPS. A PSPS, or de-energization, occurs when a Utility proactively de-energizes power lines that may fail in certain weather conditions in specific areas to reduce the possibility of fires caused by electric infrastructure. It is a measure that can be used only after the Utility has exhausted all other means to protect against wildfire ignition risks from utility infrastructure. A PSPS differs from an emergency shutoff, which may happen during an incident to protect first responder safety. PSPS events undertaken by utilities to protect public safety must be implemented according to California Public Utilities Codes.

2. Playbook Summary

2.1 The PSPS Playbook and its annexes contain the following key plan elements:

- Describes actions and communications protocols undertaken in each of 5 stages of response to extreme wildfire threat conditions up to and including de-energization and re-energization.
- Describes the five levels of impact that an emergency can have on the organization and the five corresponding emergency activation levels in the Company Emergency Response Plan as well as actions to be taken at each activation level.
- Presents an Incident Command response structure that has clearly defined roles and functions.
- Identifies coordination efforts with outside organizations, e.g., government, media, other gas and electric utilities, essential community services, vendors, public agencies, first responders and contractors.
- Defines how LU trains for and exercises or tests plans and procedures.
- Describes protocols in place to learn from PSPS events and document lessons learned.
- Provides procedures for exercise documentation, and required CPUC forms.
- Presents Job Action Sheets for the Incident Management Team.

3. Scope of Emergency Response Playbook – PSPS Stages (Notification Types)

3.1 Stage 1 (Potential PSPS): Activating PSPS Protocols/forecast shows potential for an emergency event

PSPS protocols are activated when a utility has determined a potential exists to proactively de-energize areas due to threatening conditions. This is the first stage of a PSPS event. This stage should ideally occur at least 72 hours from when power lines will potentially be de-energized

- *Notify cities, counties, emergency services (public safety partners).* 'Public safety partners' include first/emergency responders at the local, state and federal level, water, wastewater and communication service providers, affected community choice aggregators and publicly-owned utilities/electrical cooperatives,

the Commission, the California Governor's Office of Emergency Services, and the California Department of Forestry and Fire Protection.

- *Notify regional utilities, cell tower operators, and critical facilities.*
- *Notify employees including West Region Leadership and PSPS Steering Committee, have a brief call with Operations, determine which external resources are necessary, reach out for availability if needed.*
- Communications must convey to public safety partners at the time of first notification preceding a de-energization event information pertaining to the upcoming de-energization to include estimated start time of the event, estimated duration of the event, and estimated time to full restoration.
- Determine which external resources are necessary, reach out for availability if needed.

3.2 Stage 2 (Imminent PSPS): Decision to De-energize - forecast more accurate, further notification

The second stage of a PSPS event is when the utility has made the decision to de-energize pre-identified outage areas that are at risk due to threatening conditions.

3.2.1 Up to 72 hours in advance – notify medical baseline or medically sensitive patients, and cities, counties, emergency services (public safety partners), regional utilities, and cell tower operators (critical facilities and infrastructure).

- Health Care Facilities
 - (1) Primary Care Hospitals
- Utility Services/Districts
 - (2) Public Utility Districts
 - (3) Telecommunications
 - (4) Water/Water Treatment
 - (5) Pipeline
- Public safety agencies
 - (1) Public Safety Dispatch Centers
 - (2) Law enforcement facilities/holding facilities
 - (3) Fire operations facilities
 - (4) Transportation equipment and facilities
- Government facilities
- Green Cross/Life Line

3.2.2 72-48 hours requirement for initial notification to public safety partners/priority notification entities.

3.2.3 Up to 48 hours in advance – notify all affected or potentially affected customers, public safety partners, CPUC, and the media.

3.2.4 Up to 24 hours in advance – notify all affected or potentially affected customers, public safety partners, CPUC and the media.

3.2.5 Escalate to larger group, start to involve the Steering Committee.

3.2.6 Mutual aid coordination, determine available resources and resource gaps.

3.3 Stage 3 (Implemented PSPS): De-energization Initiated

The third stage of a PSPS event is when a utility has begun the process of shutting off power to areas determined in prior notifications/stages of the PSPS event. The time between a decision to de-energize and the act of de-energization may occur simultaneously.

3.3.1 Immediately before de-energization – notify all affected or potentially affected customers, public safety partners, CPUC and the media.

3.3.2 Continuously monitor forecasts.

3.3.3 Communications.

- At the time of first notification preceding a de-energization event, make available a Geographic Information System (GIS) shapefile via a secure data transfer process depicting the most accurate and specific information possible on the boundaries of the area subject to de-energization to public safety partners whose jurisdictions or service areas will be impacted by the event. Data must also display affected circuits and any other information that is requested by public safety partners that can reasonably be provided.
- Utilize multiple communications platforms to keep affected customers updated once de-energization has begun and during re-energization, recognizing , communication channels may be restricted due to the loss of power. For a timeline of communications tactics please see the Communications Play book here.

3.4 **Stage 4: Initiating Re-energization Protocols.**

At this stage, the utility has determined the weather event has subsided and has begun assessment patrols of power lines for re-energization.

3.5 **Stage 5 (Restored Power): All PSPS Lines Re-energized/Post Event Recording**

The final stage of a PSPS event is the point at which all lines de-energized by the PSPS event have been restored and re-energized.

3.5.1 Communications.

- At the conclusion of the PSPS Event – notify all affected or potentially affected customers, public safety partners, CPUC, and the media. When appropriate, distribute the post-PSPS event survey.

3.5.2 Post Event Recording.

- Follow San Diego G&E after action report format to submit an after action report to the Director of the CPUC Safety and Enforcement Division within 10 business days of power restoration.

3.7 **Emergency Activation Guidelines**

3.7.1 Activation Levels - There are five emergency activation levels. See Appendix A for additional details on the operating conditions and typical storm levels related to each activation level.

- *Activation Level 5 – Small Impact Event (Localized Response Condition)*
- *Activation Level 4 – Moderate Impact Event (Heightened Alert)*
- *Activation Level 3 – Serious Impact Event (Enhanced Support)*
- *Activation Level 2 – Major Impact Event (Comprehensive Support)*
- *Activation Level 1 – Catastrophic Impact Event (Emergency Support)*

3.8 **Customer Communications Plan**

3.8.1 De-energization Events

- In the event of a Public Safety Power Shutoff (PSPS), Liberty CalPeco will communicate directly and indirectly with its customers and the public utilizing various media and communication platforms. For a detailed outline of communications tactics, please see the PSPS Communications Playbook here.
- Medical Baseline or “Green Cross” customers will receive a direct phone call from Liberty CalPeco staff notifying them of the outage details, including but not limited to time, duration, and reason. Liberty CalPeco’s goal, whenever possible, is to notify the medical baseline customer group 72 hours in advance of a PSPS event.
- ALL other affected customers will receive direct text, email, and/or voice message notification via the

Everbridge system, notifying customers about the outage and outage details, including but not limited to time, duration, and reason. Liberty CalPeco's goal, whenever possible, is to notify the general public and non-medically sensitive customer group 48 hours in advance of a PSPS event.

- Liberty CalPeco's social media accounts and website will also be updated regularly with outage information. Local news publications, radio stations, and TV media will be notified with a press release and public service announcement (PSA).
- ALL audiences will be directly communicated with 24 hours in advance and right before the PSPS commences, as appropriate.
- During the PSPS, updates will be sent directly to customers and the media, and posted to social media accounts and the Liberty CalPeco website as updates are made available or situations change.
- Once the outage has concluded, a final update will be sent directly to ALL audiences, and posted to social media accounts and the Liberty CalPeco website with a request that any customers still out of power notify the Company.

PSPS Notification Matrix

| Timeframe | Notification |
|---|--|
| Stage 1: POTENTIAL PSPS > 72 Hours | Public Safety Partners Regional utilities, cell tower operators, and critical facilities Internal employees |
| Stage 2: IMMINENT PSPS 72-48 hours in advance of de-energization | Medical baseline or medically sensitive patients Public Safety Partners State (PSPS State Notification Form) CPUC (email) Media |
| Stage 2: IMMINENT PSPS 48-24 hours in advance of de-energization | Public Safety Partners State (PSPS State Notification Form) CPUC (email) Media All affected customers |
| Stage 2: IMMINENT PSPS 1-4 hours in advance of de-energization | All affected customers |
| Stage 3: IMPLEMENTED PSPS De-energization | All affected customers State (PSPS State Notification Form) CPUC (email) |
| Stage 4: RESTORATION INITIATED Upon weather event subsidence | Notification of re-energization patrols to all affected customers State (PSPS State Notification Form) CPUC (email) |
| Stage 5: EVENT CONCLUDED Upon completion of re-energization patrols | Notification of restoration and re-energization State (PSPS State Notification Form) CPUC (email) Affected Customers Public Safety Partners CPUC Media |

3.8.2 Communication Channels

- Indirect Communication:
 - (1) Liberty CalPeco website: Libertyutilities.com
- Liberty CalPeco Social Media:
 - (1) Twitter @LibertyUtil_CA
 - (2) Facebook @LibertyUtilitiesLT
- Media, including but not limited to:
 - (1) SouthTahoeNow.com
 - (2) Tahoetopica.com
 - (3) Sierra Sun
 - (4) Tahoe Daily Tribune
 - (5) KTKR radio
 - (6) KRLT Radio
 - (7) NPR
 - (8) Reno/Sacramento local TV stations

3.8.3 Consistent Communication includes:

- Vetted messaging templates, status update templates, communications to Oakville

3.9 Role and Functions

3.9.1 Roles and descriptions (1 primary, 2 backups for each role)

- **Incident Commander** – This position is usually the President of the Company; however, this responsibility may be delegated to a manager depending upon the emergency at hand. A single Incident Commander will be appointed for each working shift and will serve as the overall Incident Commander when the ICS is activated. The Incident Commander will be the "individual in charge" establishing a clear chain of command, control of information, and emergency coordination. When the Incident Commander is called upon to assist the Regional Incident Commander, and the ICS has not yet been activated, this individual will serve as a policy resource to the Regional Incident Commander. The Incident Commander's roles and responsibilities include:
 - (1) Providing policy guidance and approval for strategies, actions and activities.
 - (2) Communicating directly with Corporate Headquarters
 - (3) Serving as the responsible authority for strategy and content of Public Information and Company Communications
- **Emergency Services Coordinator** – This position ensures the Emergency Management Plan and supporting documents are developed, maintained, distributed, and updated as necessary. Provides support of the EMP execution during responses to emergency events in the EOC. Maintains day-to-day responsibility to continuously monitor weather conditions and initiate actions to evaluate potential weather events. Ensures necessary resources and contractual agreements are in place to meet the needs of storm restoration upon EOC activation. Maintains the Liberty Utilities EOC in a state of readiness. Maintain rosters of personnel assigned to emergency duty. Ensures personnel maintain emergency role training and qualifications. Coordinate and evaluate drills and exercises in accordance with industry best practices.
- **Safety Officer** – This position provides review of emergency operation activities to ensure work is being performed safely, ensures public safety around facilities that may be energized, and assists in prioritization of safety-related matters. This position also provides for the protection and security of company employees and assets, mitigates damage to facilities, and ensures effective coordination with law enforcement agencies. The Safety & Security Officer's roles and responsibilities include:
 - (1) Developing strategy and content of press conferences, news releases, and other media activities.
 - (2) Acting as liaison with national and local media and governmental operations

centers.

- (3) Managing employee/Company communications, including status, instructions, and updates as necessary.

- **Public Information Officer** – This position works in conjunction with the Incident Commander or as support to the Regional Incident Commanders to develop communication strategies and content of all information to be disseminated pertaining to the emergency event(s). The PIO's roles and responsibilities include:
 - (1) Developing strategy and content of press conferences, news releases, and other media activities.
 - (2) Acting as liaison with national and local media and governmental operations centers.
 - (3) Managing employee/Company communications, including status, instructions, and updates as necessary.
- **Administration Officer** – This position is responsible for tracking and all documentation relating to emergency management activities (emergency events, exercises, lessons learned, etc.). Manages central depository for all emergency management documents.
- **Liaison Officer** – This position provides a link between the utility and external agencies to provide information regarding any impacts the event may have on the utility's ability to provide/restore service. The Emergency Response Liaison's roles and responsibilities include:
 - (1) Communicating with local, state, and federal emergency managers and emergency operation centers to keep them apprised of the status of the event(s) and assist in the coordination of emergency response efforts as necessary.
 - (2) Assisting in coordination and communication with other utilities, local or regional government entities, and emergency response agencies as necessary.
 - (3) Providing guidance and strategy in company emergency may engage contract or mutual aid services in support of the emergency. Schedules manpower or resources to cover additional emergency operations periods
- **Operations Section Chief** – This position is responsible for the management of all tactical operations directly applicable to the emergency response. Provides direction to the frontline field personnel in damage assessment and priorities and requests resources necessary to restore service. Areas of responsibility include distribution, transmission, emergency generation and customer service.
- **Planning Section Chief** – This position prepares and disseminates the Incident Action Plan, and tracks the status of all incident resources. The Planning Section collects and evaluates information, maintains documentation for incident records and provides resources such as maps. If no Planning Section is established, the Incident Commander will perform the planning functions.
- **Logistics Section Chief** – This position is responsible for providing the equipment, supplies and personnel required to respond to the emergency. This position provides analysis of emergency information and situations and develops plans to be used during the response and recovery operations to fully return electric service as quickly as possible for the least cost. This position also facilitates implementation of action plans.
- **Finance Section Chief** – This position is responsible for ensuring that funds are available as needed for the emergency. This position is also responsible for tracking costs and maintaining records throughout the event.

3.9.2 Activation tree/criticality tiers (needs building out)

- No singular factor ultimately determines a PSPS decision. LU carefully reviews a combination of several factors when determining if power must be turned off for safety. These include:

- (1) A Red Flag Warning declared by the NWS; Low humidity levels, generally 20 percent and below; Forecasted sustained winds generally above 25 miles per hour (mph) and wind gusts in excess of approximately 45 mph, depending on location and site-specific conditions such as temperature, terrain and local climate.
- (2) Computer simulated ignition spread and consequence modeling based on current conditions;
- (3) Condition of dry fuel on the ground and live vegetation (moisture content); and
- (4) On-the-ground, real-time wildfire related information from LU's WSOC and field observations from LU field crews.

3.9.3 Generally, the first trigger for a potential PSPS event is a forecast of fire danger and high wind conditions by LU's Meteorology team. With the enhanced situational awareness from increased weather stations, and advanced modelling, LU's Meteorology team predicts conditions specific to local geographic areas. Once LU's Meteorology team has issued these forecasts, LU activates its Emergency Operations Center (EOC), with a designated Incident Commander. Under the EOC structure, LU Plans, Operations, and other ICS teams continually monitor the latest weather forecasts as well as local conditions in areas forecasted for Extreme-Plus conditions. These teams continuously update the Incident Commander on the real-time status of the factors listed above. While these conditions continue, the Incident Commander will evaluate whether to call for a PSPS, based on these inputs. The foregoing describes LU's 2019 process, and our criteria are continually evaluated to remove as much subjectivity from the decision-making as practical, but there is currently no singular algorithm that yields an objective result.

3.9.4 Role checklist/guidelines (position primaries develop scripts) (See Appendix G)

PSPS Battle Rhythm – Operational Activity Matrix

The operational activity matrix provides a time-phased list of actions in response to a PSPS event in California. Depending on the duration or intensity of the event, some actions may continue throughout subsequent phases of response.

| Time | Responsible Entity | Action |
|---|--------------------|--|
| Stage 1: POTENTIAL PSPS 72 hours prior to weather event | IC/Admin Officer | • Activate Emergency Operations Center (EOC) |
| | Plans Officer | • Identify geographic area/portion of the grid at risk for de-energization |
| | Plans Officer | • Identify circuits at risk for de-energization |
| | Plans Officer | • Identify number of customers at risk for de-energization (segment by commercial, residential, medical baseline and AFN) |
| | Liaison Officer | • Identify critical facilities at risk for de-energization |
| | Plans Officer | • Identify approximate time of de-energization |
| | Plans Officer | • Develop map highlighting the de-energization zone |
| | IC/Admin Officer | • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> |
| | Liaison Officer | • Notifies Local Public Safety Partners |
| Stage 2: IMMINENT PSPS 48 hours prior to weather event | IC/Admin Officer | • Initiates State Executive Conference Calls and Operational Briefings |
| | Liaison Officer | • Facilitates coordination call with impacted counties |
| | Liaison Officer | • Provides additional briefings to impacted counties, as needed |
| | PIO | • Begins broad, public notifications via news releases, social media, etc. |
| | Plans Officer | • Identify geographic area/portion of the grid at risk for de-energization |
| | Plans Officer | • Identify circuits at risk for de-energization |
| | Plans Officer | • Identify number of customers at risk for de-energization (segment by commercial, residential, medical baseline and AFN) |
| | Liaison Officer | • Identify critical facilities at risk for de-energization |
| | Plans Officer | • Identify approximate time of de-energization |
| | Plans Officer | • Develop map highlighting the de-energization zone |
| | Liaison Officer | • Confirm locations of Community Resource Centers |
| | Plans Chief | • Develops Incident Action Plan (IAP) |
| | Finance Chief | • Assesses and allocates resources |
| | | |

| | | |
|--|------------------|--|
| | IC/Admin Officer | • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> |
| | IC/Admin Officer | • Facilitates State Executive Conference Calls and local Operational Briefings |
| | Liaison | • Notifies Local Public Safety Partners |
| | PIO PIO | • Notifies affected customers and stakeholders • Begins broad, public notifications via news releases, social media, etc. |

| Time | Responsible Entity | Action |
|---|--|--|
| Stage 2: IMMINENT PSPS 24 hours prior to weather event | IC/Admin Officer | • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> |
| | Liaison Officer | • Notifies Local Public Safety Partners |
| | PIO | • Notifies affected customers and stakeholders |
| | IC/Admin Officer | • Facilitates State Executive Conference Calls and Operational Briefings |
| | Operations Chief | • Begins pre-patrols to view existing damage before event occurs |
| | Plans Chief | • Begins assessment of the need for Customer Resource Center/Customer Information Charging Center |
| | IC Plans Chief Plans Chief Logistics Chief Plans Chief | • Utility initiates “C Suite” notifications • Develops Incident Action Plan (IAP) • Develops consolidated IAP for entire event • Deploys resources to staging areas • Refines customer analysis as weather event changes |
| Stage 2: IMMINENT PSPS Weather Event | IC/Admin Officer | • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> |
| | IC/Admin Officer | • Facilitates State Executive Conference Calls and Operational Briefings |
| | PIO | • Notifies affected customers/stakeholders |
| | Operations Chief | • Deploys field observers |
| | Plans Chief | • Monitors National Weather Service (NWS) forecasts and |
| | Plans Chief | • Coordinates meteorology with NWS and dashboards and analyzes with customer impact lists |
| | IC | • Actively assesses de-energization • Decides to de-energize power lines |

| Time | Responsible Entity | Action |
|--|--|--|
| Stage 3: IMPLEMENTED PSPS (De-energization) | IC/Admin Officer Operations Chief Operations Chief Logistics Chief Operations Chief IC/Admin Officer | <ul style="list-style-type: none"> • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> • Shuts off power • Answers field questions • Prepares for re-energization staging • Plans for patrols after weather event is over • Facilitates State Executive Conference Call and Operational Briefings |
| Stage 4: RESTORATION INITIATED | IC/Admin Officer Operations Officer Plans Chief Plans Chief Operations Chief IC/Admin Officer | <ul style="list-style-type: none"> • Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> • Begins patrols and assesses lines for re-energization • Confirm geographic area/portion of the grid that experienced the de-energization event • Confirm number of customers who experienced de-energization (segment by commercial, residential, medical baseline and AFN) • Identify areas where infrastructure-caused wildfire risk was prevented due to PSPS • Facilitates State Executive Conference Call and Operational Briefings |
| Stage 5: EVENT CONCLUDED (Re-energization) | IC/Admin Officer Liaison PIO PIO | <ul style="list-style-type: none"> • Simultaneously sends notification of complete restoration/re-energization to CSWC via PSPS State Notification Form and CPUC via email • Notifies Local Public Safety Partners • Notifies affected customers and stakeholders • Begins broad, public notifications via news releases, social media, etc. |

Emergency Management Training Plan

4.1 Plan for training roles and positions.

Regarding emergency training and exercises, the Liberty Utilities (LU) Community Wildfire Mitigation Program uses threat and hazard identification, risk and capability assessments, new strategies, past AARs, and Improvement Plans (IPs) to determine Liberty Utilities' emergency preparedness and response strategy and program priorities. Emergency Management is responsible for communicating and coordinating LU's emergency preparedness training and company emergency exercise program.

Appendix A:

| Liberty Utilities | | Operating Conditions and Storm Levels | | | | TABLE 2 | | | | | | Communication Characteristics |
|-------------------|--|--|--|--|---------------------------|---------------------|------------------------|-------------------------|-------------------------|-------------------|---------------------|--|
| Storm Event Level | Operating Condition | Expected % of Customers w/o Service & Duration (1) | Expected Number of Trouble Locations / Devices (2) | Expected Number & Types of Crews | Typical Event Frequency | Snow (wet / inches) | Ice Accretion (inches) | Tree Foliage: Less than | Tree Foliage: Less than | Wind Impact (mph) | Wind Only (mph) | |
| 5 | Small Impact Event (Localized Response Conditions) | > 2,500 & < 4,499 customers | 0 - 4 Locations or Devices of Trouble | Normal activity, daily internal crew assignments. | 5 - 75 times per year | ≤ 2" | < 0.25 | | | ≤ 25 | < 25 Gusts to 25 | • Crisis attracts little or no attention • Public and/or media are virtually unaware • email notification to DL ON Oakville 911 Level 5 |
| | | AND | | | | | | | | | | |
| | | > 1 & < 12 hour ERT for full system service restoration | | | | ≤ 4" | < 0.50 | ✓ | | ≤ 10 | | |
| 4 | Moderate Impact Event (Heightened Alert) | > 4,500 & < 9,999 customers | 2 - 10 Locations or Devices of Trouble | Normal activity, daily internal crew assignments. Possible crew transfer between areas. Utility Contractor crews (overhead line and tree) limited to normal daily complement, as needed. | 5 - 15 times per year | ≤ 6" | < 0.25 | ✓ | | ≥ 25 | 15 - 25 Gusts to 45 | • Crisis situation may/may not have occurred; the situation is attracting slow but steady media coverage • The public at large is aware of the situation/event but is attracting very little attention • email notification to DL ON Oakville 911 Level 4 |
| | | AND | | | | ≤ 8" | 0.25 - 0.50 | ✓ | | 15 - 25 | | |
| | | > 12 & < 24 hour ERT for full system service restoration | | | | ≤ 10" | 0.50 - 0.75 | ✓ | ✓ | ≤ 10 | | |
| 3 | Serious Impact Event (Enhanced Support) | > 10,000 & < 19,999 customers | 3 - 15 Locations or Devices of Trouble | Regional or System ICS may be initiated and Regional EOC's may be opened. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. | 0 - 5 times per year | ≤ 6" | 0.10 - 0.25 | ✓ | ✓ | ≥ 35 | 35 - 45 Gusts to 55 | • Crisis causes growing attention from local and regional media • Affected and potentially affected parties threaten to talk to the media • email notification to DL ON Oakville 911 Level 3 |
| | | AND | | | | ≤ 8" | 0.25 - 0.50 | ✓ | ✓ | 25 - 35 | | |
| | | > 24 hour ERT for full system service restoration | | | | ≤ 10" | 0.50 - 0.75 | ✓ | ✓ | 15 - 25 | | |
| 2 | Major Impact Event (Comprehensive Support) | > 20,000 to < 50% customers | > 5 Locations or Devices of Trouble | Regional or System ICS will be initiated. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. | Once every 1 to 10 Years | ≤ 12" | 0.25 - 0.50 | ✓ | ✓ | ≥ 35 | 45 - 55 Gusts to 75 | • Media are reaching out to employees and non-communication staff for information about the crisis • Broadcast and print media are on-site for live coverage • In addition to the media, stakeholders and community partners are present at site • email notification to DL ON Oakville 911 Level 2, with phone call per protocol to confirm receipt |
| | | AND | | | | ≤ 14" | 0.50 - 0.75 | ✓ | ✓ | 25 - 35 | | |
| | | > 24 hour ERT for full system service restoration | | | | ≤ 16" | 0.75 - 1.00 | ✓ | ✓ | 15 - 25 | | |
| 1 | Catastrophic Impact Event (Emergency Support) | > 50% customer interruptions | > 10 Locations or Devices of Trouble | Regional and/or System ICS will be initiated. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. | Once every 10 to 25 Years | ≤ 15" | 0.50 - 0.75 | ✓ | ✓ | ≥ 35 | ≥ 55 Gusts to ≥ 75 | • Public health & safety is concerned • National or international media are covering as major news • Major government attention is present • There is real or potential environmental harm • One or more groups are expressing anger or outrage • email notification to DL ON Oakville 911 Level 1, with phone call per protocol to confirm receipt |
| | | OR | | | | | 0.75 - 1.00 | ✓ | ✓ | ≥ 25 | | |
| | | > 72 hour ERT for full system service restoration | | | | | 1.00 - 1.50 | ✓ | ✓ | ≥ 15 | | |
| | | | | | | | > 1.50 | ✓ | ✓ | Any | | |

| LU CA Electric Emergency Incident Levels and Classification Guidelines | | | | | |
|--|---|--|--|--|--|
| Classifications | Level 5: Small Impact Event | Level 4: Moderate Impact Event | Level 3: Serious Impact Event | Level 2: Major Impact Event | Level 1: Catastrophic Impact Event |
| Expected # of Customers w/o Service & Duration (1) | > 2,500 & < 4,499 customers AND > 1 hr & < 12 Hr ERT for full service restoration | > 4,500 & < 9,999 customers AND > 12 hr & < 24 Hr ERT for full service restoration | > 10,000 & < 19,999 customers AND > 24 hour ERT for full system service restoration | > 20,000 to < 50% customers AND > 24 hour ERT for full service restoration | > 50% customer interruptions OR > 72 hour of ERT for full service restoration |
| Expected Number & Types of Crews | Normal activity, daily internal crew assignments. | Normal activity, daily internal crew assignments. Possible crew transfer between areas. Utility Contractor crews (overhead line and tree) limited to normal daily complement, as needed. | Regional or System ICS may be initiated and Regional EOC's may be opened. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. | Regional or System ICS will be initiated. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. | Regional and/or System ICS will be initiated. All available Ops personnel are utilized. Utility Contractor, Mutual Aid Assistance, tree crews, and support functions such as logistics will be used as needed. CPUC notification required. |
| Email | DL ON Oakville 911 Level 5 | DL ON Oakville 911 Level 4 | DL ON Oakville 911 Level 3 | DL ON Oakville 911 Level 2 | DL ON Oakville 911 Level 1 |

Appendix B: Mutual Aid Coordination

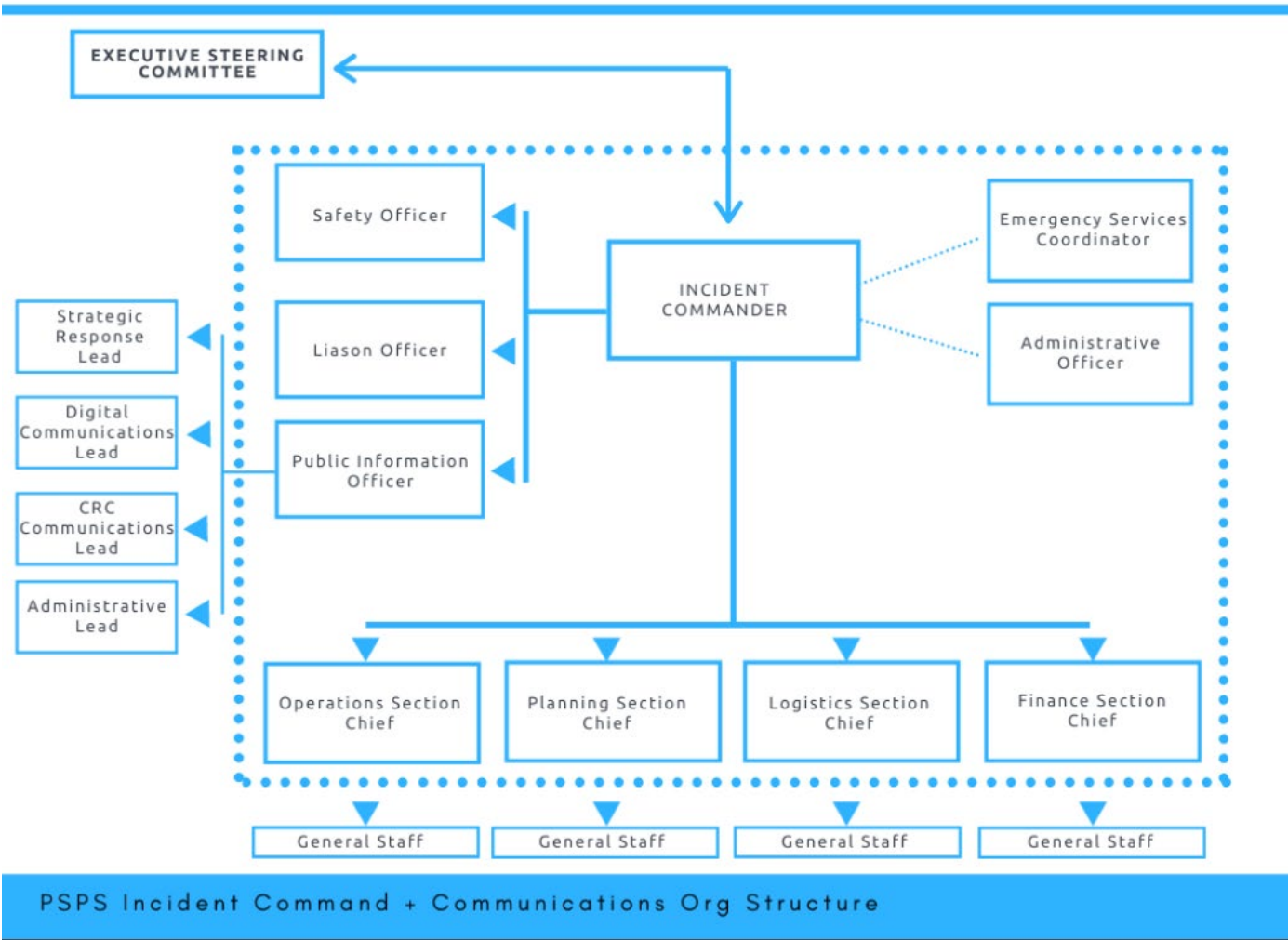
Mutual Aid - The Incident Commander has responsibility for mobilizing resources, contracting for additional assistance and supplies, and calling for assistance from neighboring utilities through Mutual Aid Agreements. Liberty Utilities has negotiated a Mutual Assistance Agreement for labor and equipment resources with NV Energy, and is a member of the CUEA and Western Energy Institute Mutual Assistance Roster

- The type, size and duration of an emergency event will determine, in varying degrees, the amount of resources required to respond to the event. The Regional Operations do not have enough resources to respond to a large emergency event without supplementing manpower, equipment or materials from other sources.
- The Incident Commander will direct the requests for additional internal (company) and external resources; The Incident Commander must approve the use of Mutual Aid.
- Requests may be made for efficiency and not for exhausted resources. Resource requests may include trade and non-trade personnel to assist in safety stand-by, damage assessment, planning or liaison activities, or materials and equipment necessary to facilitate restoration of utilities.

Appendix C: NH Electric Control Coordination

Under normal operating conditions Liberty Utilities Tahoe dispatch functions are handled through Tahoe facilities during the day and through the New Hampshire facility at night. During a PSPS event it is assumed that both day and night dispatch functions would be directly handled through the North Lake Tahoe facility. Troublemakers and crews will make calls directly to the North Lake Tahoe office, and the calls will be taken by the Operations Section in a location separate from the main EOC. Due to infrastructure limitations, overall system control (configurations of circuits, etc.) will still take place through the New Hampshire facility. A constant line of communications will need to be kept open with the New Hampshire Facility for system de-energization and re-energization.

To ensure the safety of linemen one team will be assigned per zone during re-energizing operations. PDF map packets for each zone will be available for viewing by electronic device, or just in time printing.



Appendix D: Protocols in Place to Learn from PSPS Events and document Lessons Learned

Following major incidents or events that lead to an activation of an LU EOC, including major wildfire incidents and PSPS events, LU routinely conducts After Action Reviews (AARs) to identify, collect and address lessons learned from such incidents and events. This process is conducted per CPUC GO 166, “Standards for Operation, Reliability and Safety During Emergencies and Disasters.”

Following an activation of the EOC, LU prepares an AAR, which generally involves the following process:

- Feedback from EOC staff who supported the activation is solicited and analyzed;
- An Improvement Plan is developed and disseminated to the appropriate stakeholders within the affected lines of business;
- Appropriate corrective actions determined, including reviewing emergency operations plans to determine whether modifications need to be made;
- Individual action items tracked as appropriate; and,
- Action item status reported monthly to internal corporate leadership


As applicable, such as in the Post-Event De-Energization Reports, LU also identifies and reports key lessons learned from PSPS events, which are an outcome from the AAR process.

Appendix E: Exercise Documentation

Exercises and events will be documented in Homeland Security Exercise and Evaluation Program (HSEEP) format. Through the use of the HSEEP, exercise program managers can develop, execute, and evaluate exercises that address the preparedness priorities established by senior leaders. These priorities are informed by risk and capability assessments, findings, corrective actions from previous events, and external requirements. Priorities guide the overall direction of the exercise program, where individual exercises are anchored to a common set of priorities or objectives and build toward an increasing level of complexity over time. Accordingly, these priorities guide the design and development of individual exercises, as planners identify exercise objectives and align them to capabilities for evaluation during the exercise. Exercise evaluation assesses the ability to meet exercise objectives and capabilities by documenting strengths, areas for improvement, capability performance, and corrective actions in an After-Action Report/Improvement Plan (AAR/IP). Through improvement planning, LU can take the corrective actions needed to improve plans, build and sustain capabilities, and maintain readiness.

Appendix F: CalOES PSPS Form

Once activated, all utilities must notify the California State Warning Center (CSWC) via the Public Safety Power Shutoff (PSPS) State Notification Form each time it reaches one of the five defined PSPS stages. When multiple PSPS events occur simultaneously, it is ok to provide all information and updates on one PSPS State Notification Form. The PSPS State Notification Form is the official notification of PSPS events and updates from a utility to Cal OES. The utility must immediately call the California State Warning Center at **(916) 845-8911 every time a form is submitted to Cal OES for confirmation of receipt.**

| | | |
|---|--|----------------------------------|
|  | Public Safety Power Shutoff (PSPS) State Notification Form | |
| | Utility Submitting Report: | |
| | Date Report Prepared by Utility: | Time Report Prepared by Utility: |

Please complete this form per instructions provided and send to the California State Warning Center at warning_center@oes.ca.gov. Upon submission of form, call the CSWC at (916) 845-8911 to confirm receipt. Please call with any questions.

1.a | Notification Type*

| | | |
|--|-----------------------------|---------------------------|
| Activating PSPS Protocols/ Potential to De-energize | Decision to De-energize | De-energization Initiated |
| Initiating Re-energization Patrols | All PSPS Lines Re-energized | EOC Activated? YES NO |
| Is this an update notification? YES NO | | |
| If Yes, provide update number: | | |
| Update Details: | | |
| Attachments Included? YES NO # of Attachments? | | |

1.b | Utility Information*

| | |
|-----------------------------|---------------------------------|
| Utility Contact: | Email Address: |
| Phone Number: | Additional Contact Information: |
| Utility Operational Period: | |
| Proposed Briefing Times: | |

Confidentiality Notice

This document is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited without the express, written consent of the Cal OES Executive Office.

Please attach additional information, including:

- PDF maps or links to data sources

Incident Response Guide: PSPS

Directions

Read this entire response guide and review the Incident Management Team Activation chart. Use this response guide as an aid in reviewing plans for PSPS response.

Objectives

- ☐ Ensure the continued safety of communities served
- ☐ Protect the physical environment when a wildland fire threatens the region
- ☐ Ensure notification of, public safety partners, critical facilities and infrastructure, medical baseline patients, cities, counties, potentially affected customers, CPUC, and the media within the required timeframes
- ☐ Ensure the continuation of electric service subsequent to a PSPS event

STAGE 1 POTENTIAL PSPS

| Section | Officer | Time | Action | Initials |
|---------|----------------------------|------|--|----------|
| Command | Incident Commander | | Receive and assess the situational status | |
| | | | Activate the Emergency Management Plan, including the PSPS Playbook. | |
| | | | Activate the Emergency Operations Center and applicable Incident Management Team positions. | |
| | | | Establish operational periods, objectives and a regular briefing schedule. | |
| | | | Determine the need to alter current operations to ensure the safety of staff, customers, and the physical environment. | |
| | | | Notify the Chief Executive Officer, and other appropriate internal and external officials of situation status. | |
| | | | Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> | |
| | | | Initiates State Executive Conference Calls and Operational Briefings | |
| | Public Information Officer | | Begins broad, public notifications via news releases, social media, etc. | |
| | Liaison Officer | | Identify critical facilities at risk for de-energization | |
| | | | Notifies Local Public Safety Partners | |
| | | | Facilitates coordination call with impacted counties | |
| | | | Provides additional briefings to impacted counties, as needed | |

| | | | | |
|--|----------------|--|--|--|
| | Safety Officer | | Assess the physical environment for potential health risks. | |
| | | | Initiate ICS 215A to assign, direct, and ensure safety actions are adhered to and completed. | |

STAGE 1 POTENTIAL PSPS

| Section | Branch/Unit | Time | Action | Initials |
|------------|---------------|------|---|----------|
| Operations | Section Chief | | Identify circuits at risk for de-energization | |
| | | | Identify number of customers at risk for de-energization (segment by commercial, residential, medical baseline and AFN) | |
| Planning | Section Chief | | Identify geographic area/portion of the grid at risk for de-energization | |
| | | | Identify approximate time of de-energization | |
| | | | Develop map highlighting the de-energization zone | |
| Logistics | Section Chief | | | |

STAGE 2 IMMINENT PSPS 48 HOURS PRIOR

| Section | Officer | Time | Action | Initials |
|---------|----------------------------|------|--|----------|
| Command | Incident Commander | | Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> | |
| | | | Facilitates State Executive Conference Calls and local Operational Briefings | |
| | | | Notify the Chief Executive Officer, and other appropriate internal and external officials of situation status. | |
| | Public Information Officer | | Notifies affected customers and stakeholders | |
| | | | Begins broad, public notifications via news releases, social media, etc. | |
| | Liaison Officer | | Identify critical facilities at risk for de-energization | |
| | | | Confirm locations of Community Resource Centers | |
| | Safety Officer | | Assess the physical environment for potential health hazards such as smoke, ash, and debris. | |

STAGE 2 IMMINENT PSPS 48 HOURS PRIOR

| Section | Branch/Unit | Time | Action | Initials |
|------------|---------------|------|---|----------|
| Operations | Section Chief | | Identify circuits at risk for de-energization | |
| | | | Identify number of customers at risk for de-energization (segment by commercial, residential, medical baseline and AFN) | |
| Planning | Section Chief | | Identify geographic area/portion of the grid at risk for de-energization | |
| | | | Identify approximate time of de-energization | |
| | | | Develop map highlighting the de-energization zone | |
| | | | Develops Incident Action Plan (IAP) | |
| Finance | Section Chief | | Assesses and allocates resources | |

STAGE 2 IMMINENT PSPS 24 HOURS PRIOR

| Section | Officer | Time | Action | Initials |
|---------|---------|------|--------|----------|
|---------|---------|------|--------|----------|

| | | | | |
|----------------|-----------------------------------|--|--|--|
| Command | Incident Commander | | Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> . | |
| | | | Facilitates State Executive Conference Calls and local Operational Briefings | |
| | | | Notify the Chief Executive Officer, and other appropriate internal and external officials of situation status. | |
| | | | When weather event occurs actively assesses de-energization, facilitates Leadership decision, and executes accordingly. | |
| | Public Information Officer | | Provides notification to affected customers and stakeholders at 24 hours and again when weather event occurs | |
| | Liaison Officer | | Notifies Local Public Safety Partners | |
| | Safety Officer | | Assess the physical environment for potential health hazards. | |

STAGE 2 IMMINENT PSPS 24 HOURS PRIOR

| Section | Branch/Unit | Time | Action | Initials |
|-------------------|----------------------|------|---|----------|
| Operations | Section Chief | | Begins pre-patrols to view existing damage before event occurs | |
| | | | Deploy field observers when the weather event occurs | |
| Planning | Section Chief | | Begins assessment of the need for Customer Resource Center/Customer Information Charging Center | |
| | | | Develops Incident Action Plan (IAP) | |
| | | | Develops consolidated IAP for entire event | |
| | | | Refines customer analysis as weather event changes | |
| | | | When weather event occurs monitors National Weather Service (NWS) forecasts and Coordinates meteorology with NWS and dashboards and analyzes with customer impact lists | |
| Logistics | Section Chief | | Deploys resources to staging areas | |

STAGE 3 IMPLEMENTED PSPS

| Section | Officer | Time | Action | Initials |
|---------|----------------------------|------|--|----------|
| Command | Incident Commander | | Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> | |
| | | | Facilitates State Executive Conference Call and Operational Briefings | |
| | Public Information Officer | | Continue to monitor media sources | |
| | Liaison Officer | | | |
| | Safety Officer | | Monitor status of the Liberty Utilities health and safety hazards; update safety actions as needed. | |

STAGE 3 IMPLEMENTED PSPS

| Section | Branch/Unit | Time | Action | Initials |
|------------|---------------|------|---|----------|
| Operations | Section Chief | | Shuts off power | |
| | | | Answers field questions | |
| | | | Plans for patrols after weather event is over | |
| Planning | Section Chief | | | |
| Logistics | Section Chief | | Prepares for re-energization staging | |
| Finance | Section Chief | | Activate policy and procedures for documentation of costs associated with event | |
| | | | Track hours associated with the emergency response. | |
| | | | Track and monitor response and repair costs and expenditures. | |

STAGE 4 RESTORATION INITIATED

| Section | Officer | Time | Action | Initials |
|---------|--------------------|------|--|----------|
| Command | Incident Commander | | Continue regular briefings and action planning meetings, and modify incident objectives as needed to meet current situation. | |
| | | | Update Chief Executive Officer, and other appropriate internal and external officials of situation status. | |
| | | | Simultaneously notify the California Public Utilities Commission (CPUC) via email and the CSWC via the <i>PSPS State Notification Form</i> | |
| | | | Facilitates State Executive Conference Call and Operational Briefings | |
| | Liaison Officer | | | |
| | Safety Officer | | Maintain safety of staff to best possible extent. | |
| | | | Communicate potentially unsafe conditions to the Incident Commander | |
| | | | Conduct frequent reassessments, and monitor system repairs. | |

STAGE 4 RESTORATION INITIATED

| <i>Section</i> | <i>Branch/Unit</i> | <i>Time</i> | <i>Action</i> | <i>Initials</i> |
|-------------------|----------------------|-------------|--|-----------------|
| Operations | Section Chief | | Begins patrols and assesses lines for re-energization | |
| | | | Identify areas where infrastructure-caused wildfire risk was prevented due to PSPS | |
| | | | Confirm number of customers who experienced de-energization (segment by commercial, residential, medical baseline and AFN) | |
| Planning | Section Chief | | Confirm geographic area/portion of the grid that experienced the de-energization event | |
| | | | Ensure that updated information is incorporated into Incident Action Plan. Ensure the Demobilization Plan is being readied. | |
| | | | Continue equipment and personnel tracking, including resources transferred to other locations. | |
| | | | Prepare for demobilization and system recovery. | |
| Logistics | Section Chief | | Provide food, water, and rest periods for staff. | |
| Finance | Section Chief | | Coordinate with risk management for additional insurance and documentation needs. | |

STAGE 5 EVENT CONCLUDED

| Section | Officer | Time | Action | Initials |
|---------|----------------------------|------|---|----------|
| | Incident Commander | | Determine system status and declare termination of the incident. | |
| | | | Simultaneously sends notification of complete restoration/re-energization to CSWC via PSPS State Notification Form and CPUC via email | |
| | | | Oversee restoration of normal operations. | |
| | Public Information Officer | | Notifies affected customers and stakeholders | |
| | | | Begins broad, public notifications via news releases, social media, etc. | |
| | Liaison Officer | | Notifies Local Public Safety Partners | |
| | Safety Officer | | Monitor and maintain a safe environment during return to normal operations. | |
| | | | | |

STAGE 5 EVENT CONCLUDED

| Section | Branch/Unit | Time | Action | Initials |
|-----------|---------------|------|---|----------|
| Planning | Section Chief | | Conduct debriefings and hotwash with: <input type="checkbox"/> Incident Command Staff <input type="checkbox"/> All staff | |
| | | | Write an After Action Report and Corrective Action and Improvement Plan for submission to CPUC , including: <input type="checkbox"/> Summary of the incident <input type="checkbox"/> Summary of actions taken <input type="checkbox"/> Actions that went well <input type="checkbox"/> Actions that could be improved <input type="checkbox"/> Recommendations for future response actions. | |
| | | | Collect, collate, file, and secure completed documentation of actions, decisions, and activities. | |
| | | | Prepare summary of the status and location of all staff, and equipment. | |
| Logistics | Section Chief | | Inventory all Command Center supplies and replenish as necessary, appropriate, and available. | |
| | | | Restock supplies, equipment, to pre-incident inventories. | |

| | | | | |
|---------|---------------|--|---|--|
| Finance | Section Chief | | Compile summary of final response and recovery costs and expenditures, and submit to Planning Section Chief for inclusion in the After Action Report. | |
| | | | Ensure receipt of all personnel time sheets and documentation needed. | |

Documents and Tools

Emergency Management Plan, including:

- ☐ PSPS Playbook

Forms, including:

- ☐ ICS Incident Action Plan (IAP) Quick Start
- ☐ ICS 200 – Incident Action Plan (IAP) Cover Sheet
- ☐ ICS 201 – Incident Briefing
- ☐ ICS 202 – Incident Objectives
- ☐ ICS 203 – Organization Assignment List
- ☐ ICS 205A – Communications List
- ☐ ICS 214 – Activity Log
- ☐ ICS 215A – Incident Action Plan (IAP) Safety Analysis
- ☐ ICS 221 – Demobilization Checklist
- ☐ ICS 251 – Facility System Status Report
- ☐ California OES PSPS Form

Paper forms for downtime documentation, data entry, etc.

Job Action Sheets

Operations Area maps

Television/radio/internet to monitor news

Telephone/cell phone/satellite phone/internet/2-way radio for communications

Incident Management Team Activation: PSPS

| Position | Immediate | Intermediate | Extended | Recovery |
|--|-----------|--------------|----------|----------|
| Incident Commander | X | X | X | X |
| Public Information Officer | X | X | X | X |
| Liaison Officer | X | X | X | X |
| Safety Officer | X | X | X | X |
| Emergency Services Coordinator | X | X | X | X |
| Administrative Officer | X | X | X | X |
| | | | | |
| Operations Section Chief | X | X | X | X |
| Staging Manager | | | | |
| Medical Care Branch Director | | | | |
| Infrastructure Branch Director | | | | |
| Security Branch Director | | | | |
| Business Continuity Branch Director | | | | |
| Patient Family Assistance Branch Dir. | | | | |
| | | | | |
| Planning Section Chief | X | X | X | X |
| Resources Unit Leader | | | | |
| Situation Unit Leader | | | | |
| Documentation Unit Leader | | | | |
| Demobilization Unit Leader | | | | |
| | | | | |
| Logistics Section Chief | X | X | X | X |
| Service Branch Director | | | | |
| Support Branch Director | | | | |
| | | | | |
| Finance /Administration Section Chief | | X | X | X |
| Time Unit Leader | | | | |
| Cost Unit Leader | | | | |