

State of California
Memorandum



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| Date: | November 1, 2012 |
| To: | Pacific Gas & Electric Co. Brian Cherry, Vice President, Regulatory Relations Southern California Edison Co. Les Starck, Vice President, Regulatory Affairs Sempra Energy; San Diego Gas and Electric Co. Lee Shavrien, Senior Vice President, Regulatory Affairs Bear Valley Electric Co. Keith Switzer, Vice President NV Energy Michael Carano, Director Pacificorp Mark Tucker, Manager Regulatory Affairs |
| From: | California Public Utilities Commission Julie Halligan, Deputy Director Consumer Protection and Safety Division (CPSD) SENT VIA ELECTRONIC MAIL |
| Subject: | <i>Electric Emergency Reporting</i> |

This memo rescinds all versions of the *Guidelines for Notification of the CPUC Energy Division of Emergencies or Urgent Events in Electric Utility Systems*, sent most recently by Brian Schumacher on October 28, 2009. Recent organizational and administrative changes at the Commission necessitate simplification of the electric utility emergency reporting process.

Effective immediately, all *required* electric emergency reporting¹ is consolidated within CPSD. The Energy Division Notification Guidelines and reporting structure described in the October 2009 memo are no longer in place.

¹ Requirements contained in General Orders 166 and 167, and Decision (D.) 06-04-055, Appendix B.

Although Commission emergency reporting contacts have changed, the basic criteria for reporting electric events to the Commission remains the same, and is described more fully in the *References* section beginning at Page 4, and summarized below:

1. Reportable incidents.
2. Emergencies or disasters.
3. Major electric outages and power plant outages, including CAISO Stage 2 and 3 curtailments.
4. Events that garner a significant amount of media attention.

Please consider internet news coverage as a key component of the “media coverage” and “newsworthy events” requirements discussed in Decision (D.) 06-04-055, Appendix B; General Orders 166 and 167; and the Reference section of this memo. The instantaneous availability of online news reports underscores the need for timely and accurate utility reports to the Commission.

As described below, CPSD will also assume responsibility for the utilities’ Emergency Response Plans and Compliance Reports, due annually on October 31. Utilities need not modify the October 31, 2012 submissions to reflect the recent changes described herein, but should follow the updated reporting changes immediately.

Please update your GO 166 Emergency Response and Emergency Action Plans to reflect these changes, and distribute copies of this memo to staff who report emergencies or events to the Commission, which may include operations, emergency management, storm center, and regulatory relations departments.

cc: **CPUC**

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Emergency Reporting

Please report electrical and power plant emergencies, incidents and outages electronically to:

- <http://www.cpuc.ca.gov/emergency>

If internet access is not available, please telephone the applicable event reporting hotlines:

- Electric Utilities: 1-800-235-1076
- Power Plants: 1-415-355-5503

If the hotlines' voice mail systems are not in service, please contact the following CPSD personnel:

- Electric Utilities: Raymond Fugere (213) 576-7015 (office) (213) 220-2266 (cell)
- Power Plants: Valerie Beck (415) 703-2665 (office) (415) 990-0257 (cell)

Notification of Significant Grid Events

The CAISO will continue its current practice to notify Commission Offices, Directors and key staff of significant grid events (Alerts, Warnings and Emergencies; or AWE) by email to the CPUC's email address dedicated to receive such alerts, which is een@cpuc.ca.gov.

Utilities will also notify Commission Offices, Directors and key staff of imminent or planned curtailment of interruptible customer load and rotating outages of firm load, whether ordered by the CAISO (Stages 2 or 3) or made necessary by other emergencies, by email to een@cpuc.ca.gov. The email should specify the start time, anticipated duration and the impacted areas (city and county).

Emergency Response and Emergency Action Plans

The utilities will submit six copies of the Emergency Response Plan and the annual Compliance Report required by GO 166 Standard 1, Standard 11 and California Public Utilities Code §364 (b) to the Director of CPSD annually by October 31, and one copy to the Energy Division. Please note that the Emergency Response Plan and the Compliance Report are two separate documents. To facilitate public availability of the annual Compliance Reports as required by Standard 11 and PU Code §364, utilities will also submit an electronic version to Raymond Fugere.

PG&E, SCE and SDG&E will continue to submit no fewer than three copies of their respective Emergency Action Plans to the Director of the Energy Division annually by July 1, and one copy to CPSD.

References

1. Incident Reporting Requirements (D. 06-04-055, Appendix B)

Within 2 hours of a reportable incident during normal working hours or within 4 hours of a reportable incident outside of normal working hours, the utility shall provide notice to designated CPUC staff of the general nature of the incident, its cause and estimated damage. The notice shall identify the time and date of the incident, the time and date of notice to the Commission, the location of the incident, casualties that resulted from the incident, identification of casualties and property damage, and the name and telephone number of a utility contact person. This notice may be by (a) using to the Commission's Emergency Reporting Web Page, or (b) calling an established CPUC Incident Reporting Telephone Number designated by the Commission's Consumer Protection and Safety Division (CPSD) or its successor (c) sending a message to an electronic mail address designated by the Commission's CPSD or its successor or (d) sending a message to the Commission's facsimile equipment using a form approved by the Commission's CPSD or its successor and at numbers CPSD may designate for use during normal business hours. Telephone notices provided at times other than normal business hours shall be followed by a facsimile or email report by the end of the next working day.

- Within twenty business days of a reportable incident, the utility shall provide to designated CPUC staff a written account of the incident which includes a detailed description of the nature of the incident, its cause and estimated damage. The report shall identify the time and date of the incident, the time and date of the notice to the Commission, the location of the incident, casualties which resulted from the incident, identification of casualties and property damage. The report shall include a description of the utility's response to the incident and the measures the utility took to repair facilities and/or remedy any related problems on the system which may have contributed to the incident.
- Reportable incidents are those which: (a) result in fatality or personal injury rising to the level of in-patient hospitalization and attributable or allegedly attributable to utility owned facilities; (b) are the subject of significant public attention or media coverage and are attributable or allegedly attributable to utility facilities; or (c) involve damage to property of the utility or others estimated to exceed \$50,000.

2. Major Utility Reporting Requirements (GO 166)

Definitions:

Emergency or Disaster: An event which is the proximate cause of a major outage, including but not limited to storms, lightning strikes, fires, floods, hurricanes, volcanic activity, landslides, earthquakes, windstorms, tidal waves, terrorist attacks, riots, civil disobedience, wars, chemical spills, explosions, and airplane or train wrecks.

Major Outage: Consistent with Public Utilities Code Section 364, a major outage occurs when 10 percent of the electric utility's serviceable customers experience a simultaneous, non-momentary interruption of service. For utilities with less than 150,000 customers within California, a major outage occurs when 50 percent of the electric utility's serviceable customers experience a simultaneous, non-momentary interruption of service.

Standard 1. Emergency Response Plan

The utility shall prepare an emergency response plan ("plan") setting forth anticipated responses to emergencies and major outages. The plan will help assure the utility is best able to protect life and property during an emergency or major outage and communicate the scope and expected duration of an outage. The plan shall include the following elements:

- A. Internal Coordination**
- B. ISO/TO Coordination**
- C. Media Coordination**
- D. External and Government Coordination**
- E. Fire Prevention Plan**
- F. Safety Considerations**
- G. Damage Assessment**
- H. Restoration Priority Guidelines**
- I. Mutual Assistance**
- J. Plan Update**

The plan shall be updated annually to incorporate changes in procedures, conditions, law or Commission policy. The utility shall submit plan updates as part of the annual report required by Standard 11.

Standard 6. Initial Notification Standard:

Within one hour of the identification of a major outage or other newsworthy event, the utility shall notify the Commission and the Warning Center at the Office of Emergency Services (OES) of the location, possible cause and expected duration of the outage. The Warning Center at the OES is expected to notify other state and local agencies of the outage. Subsequent contacts between state and local agencies and the utility shall be conducted between personnel identified in advance, as set forth in Standard 4.B. From time to time the Commission staff may issue instructions or guidelines regarding reporting.

Standard 11. Annual Report

The utility shall annually report to the CPUC and other appropriate governmental agencies by October 31 regarding its compliance with this general order for the previous twelve months ending June 30. The annual report shall identify and describe any modifications to the utility's emergency plan.

**3. Generator Reporting Requirement (GO 167)
Rule 10.4 - Safety-related Incidents**

Within 24 hours of its occurrence, a Generating Asset Owner shall report to the Commission's emergency reporting web site any safety-related incident involving a Generating Asset. If internet access is unavailable, the Generating Asset Owner may report using the backup telephone system. Such reporting shall include any incident that has resulted in death to a person; an injury or illness to a person requiring overnight hospitalization; a report to Cal/OSHA, OSHA, or other regulatory agency; or damage to the property of the Generating Asset Owner or another person of more than \$50,000. The Generating Asset Owner shall also report any other incident involving a Generating Asset that has resulted in significant negative media coverage (resulting in a news story or editorial from one media outlet with a circulation or audience of 50,000 or more persons) when the Generating Asset Owner has actual knowledge of the media coverage. If not initially provided, a written report also will be submitted within five business days of the incident. The report will include copies of any reports concerning the incident that have been submitted to other governmental agencies

4. CA Public Utilities Code §364 (b) – Emergency Response

364. (a) The commission shall adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities no later than March 31, 1997. The standards, which shall be performance or prescriptive standards, or both, as appropriate, for each substantial type of distribution equipment or facility, shall provide for high quality, safe and reliable service.

(b) In setting its standards, the commission shall consider: cost, local geography and weather, applicable codes, national electric industry practices, sound engineering judgment, and experience. The commission shall also adopt standards for operation, reliability, and safety during periods of emergency and disaster. The commission shall require each utility to report annually on its compliance with the standards. That report shall be made available to the public.