



# EOP Exercise & Critical Load Review

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# Overview

On Dec. 2, PEC's Control Center coordinated a cooperative-wide EOP Drill event to simulate several EOP scenarios that could occur during another winter storm, including:

- Another load shed event similar in scale to the 2021 storm.
- The loss of communications to a district operations office.
- The loss of an entire substation from transmission – this included participation with LCRA.
- A localized loss of communications affecting member outage reporting.

The EOP drill occupied the entire morning of Dec. 2 and included over **160** PEC participants across departments and districts.

Each participating department held “Table-Top Exercises” to thoroughly discuss the execution of planned actions for roles and responses to the EOP scenarios.

# Control Center Table-Top Material

- Process for establishing the Emergency Operations Command; setting, roles, reporting, rotational shifts, and contingency planning.
- Load shed exercises:
  - Operator protocols
  - Operator training simulator through multiple shedding obligation levels
  - OMS load shed configuration changes
  - Shift Coverage Plan for a multi-day event
- Loss of entire substation from transmission, specific scenario with the Fairland Substation from LCRA.
  - PEC's EOC coordinated directly with LCRA's EOC.

# Distribution Operations Table-Top Material

Staff from all service districts and other departments worked through simulations for:

- Emergency switching using the new PEC Switching and Tagging Document.
- The transfer of operational control to a districts.
- The loss of a district operations center.
- The transferring of operational control back to the Control Center.
- Drafting communication updates for internal and external stakeholders.
- Supply chain issues – shortages for transformers, poles, fuel, etc.
- Staffing limitations due to COVID restrictions.
- Processes for managing damage assessments.

# Member Relations Table-Top Material

The goals for Member Relations was to review:

- The list of employee resources needed to support the department's primary needs.
- Emergency workspace availability and logistical support (lodging, food, supplies).
- A rotational shift schedule and assignments of critical tasks.
- Scripts for IVR and SmartHub messaging, and notifications based on specific EOP scenarios.
- Processes to suspend collections.
- Incident Command Team reporting and communication updates.
- Launching an EOP email address for Executive and Board of Director use.

# I.T. Table-Top Material

Staff from I.T. performed exercises on:

- Simulating an internet outage at Marble Falls and completing procedures to move internet connectivity at Headquarters through Switch (formerly Data Foundry).
- Simulating various connectivity outages and tracking the time to contact technical support at Verizon, Spectrum, and AT&T.
- Monitoring SolarWinds network activity for both corporate and SCADA.
- Monitoring application availability across the cooperative.
- Monitoring substation connectivity.
- Processes for preparing hardware inventory for deployment.
- Developing the rotational schedules for HelpDesk, System Ops, and Network teams.

# Communications Table-Top Material

External Relations reviewed messaging readiness across the timeline of an event:

- Before EOP:
  - Internal: Email, Wired, Intranet homepage
  - External: pec.coop updates, social media, press release
- During EOP:
  - Internal: Email, Wired, Intranet homepage, SMS texting
  - External: pec.coop updates, social media, press released, SMS texting
- Following EOP:
  - Internal: Email, Wired, Intranet homepage
  - External: pec.coop updates, social media, press release

Emergency Communication Channel Checklists

Before EOP Activation	During EOP Activation	Following EOP Deactivation
EOP activation possible due to impending or expected bad weather or emergency; this step may be omitted depending on event	EOP activated due to bad weather or emergency	EOP deactivated
<ul style="list-style-type: none"> <li>• <b>Social media:</b> EOP warning shared with interruption phone number/SmartHub info/Outage Center</li> <li>• <b>Website:</b> Post EOP activation possible/situation being monitored homepage banner and link to preparation tips web page; prepare possible switchover to emergency homepage</li> <li>• <b>Email to employees:</b> Email employees warning them of possible upcoming emergency event, stay alert, and connected</li> <li>• <b>Intranet:</b> Post email to Wired and share to Employee News and homepage banner</li> <li>• <b>Email to members:</b> Email to members warning of possible emergency situation, if applicable</li> <li>• <b>Media:</b> Answer media calls and email as received</li> <li>• <b>Social media:</b> Monitor for member and media inquiries</li> <li>• <b>SMS texting:</b> Text employees warning them of possible upcoming emergency event, stay alert, and connected</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Website:</b> Post scrolling red alert or homepage banner regarding critical EOP details; if applicable, activate emergency homepage</li> <li>• <b>Social media:</b> Share immediately known EOP information</li> <li>• <b>Press release:</b> Send to all media contacts containing EOP activation information</li> <li>• <b>Website:</b> Post press release online and on homepage</li> <li>• <b>Social media:</b> Share press release</li> <li>• <b>Email:</b> Email to members providing useful emergency information</li> <li>• <b>Intranet:</b> Post email and press release on Wired and share to Employee News and homepage banner</li> <li>• <b>Media:</b> Answer media calls and email as received</li> <li>• <b>Social media:</b> Monitor for member and media inquiries</li> <li>• <b>SMS texting:</b> Send messages and edit as necessary</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Website:</b> Post updated scrolling red alert with EOP deactivation details or simply remove the alert; if applicable, restore homepage</li> <li>• <b>Social media:</b> Post immediately known EOP deactivation information</li> <li>• <b>Press release:</b> Send press release to all media contacts containing EOP deactivation information</li> <li>• <b>Website:</b> Post press release online and on homepage</li> <li>• <b>Social media:</b> Share press release</li> <li>• <b>Website:</b> Post EOP deactivated homepage banner and link to press release. Replace banners that were removed when EOP was activated.</li> <li>• <b>Email:</b> Email to members notifying of EOP deactivation and information</li> <li>• <b>Intranet:</b> Post email and press release on Wired and share to Employee News and homepage banner</li> <li>• <b>Media:</b> Answer media calls and email as received</li> <li>• <b>Social media:</b> Monitor for member and media inquiries</li> </ul>



# Legal & Regulatory Table-Top Material

Staff from Compliance and Legal reviewed existing processes for:

- Reporting and filing notices to PUCT for “Significant Interruptions” (lasting > 1 hr., affecting 20,000 meters, an entire county, or public safety critical load).
- Reporting to the Department of Energy for attacks, threats, and uncontrolled loss of firm load:
  - Within 6 hours for loss to 50,000 customers for > 1 hr.
  - Within 24 hrs. for loss of 200 MWs for > 15 min.
  - Final Report within 72 hrs.
- Incidents of bodily injury for employees or 3<sup>rd</sup> party services.
- Managing occurrences of property damage.
- Filing insurance claims and worker’s compensation claims.
- Emergency-related modifications to PEC policy.
- CEO emergency authorizations and/or Board emergency authorizations.

# Takeaways

Overall, the exercise went very well:

- Staff from 20 different teams/offices thoroughly reviewed emergency processes (160 FTE).
- The load shedding simulation tool was very effective and provided further validation of the new capabilities of the Outage Management System.
- The notes, suggestions, and other documentation from the drill is being compiled as reference material on the internal site for future exercises.

# Program Overview

- A registry of nonresidential service locations that can be classified as public safety, industrial, or natural gas infrastructure, and have an approved Critical Load Program application with PEC.
- When planned outages or service interruptions are scheduled, PEC will attempt to provide advance notice so preparations can be made.
- For unplanned outages, PEC will prioritize Critical Load Program participants for restoration as much as possible.

The image shows two overlapping screenshots of a data table. The top screenshot shows a table with columns for 'Program', 'Name', 'Address', 'City', 'State', 'Zip', 'Phone', 'Fax', 'Email', 'Website', 'Service Type', 'Priority', 'Status', and 'Date'. The bottom screenshot shows a similar table with columns for 'Program', 'Name', 'Address', 'City', 'State', 'Zip', 'Phone', 'Fax', 'Email', 'Website', 'Service Type', 'Priority', 'Status', 'Date', 'Notes', and 'Comments'. The tables contain numerous rows of data, likely representing registered critical load sites.

**PEC can not guarantee uninterrupted, regular, or continuous power supply to our Critical Load sites.**

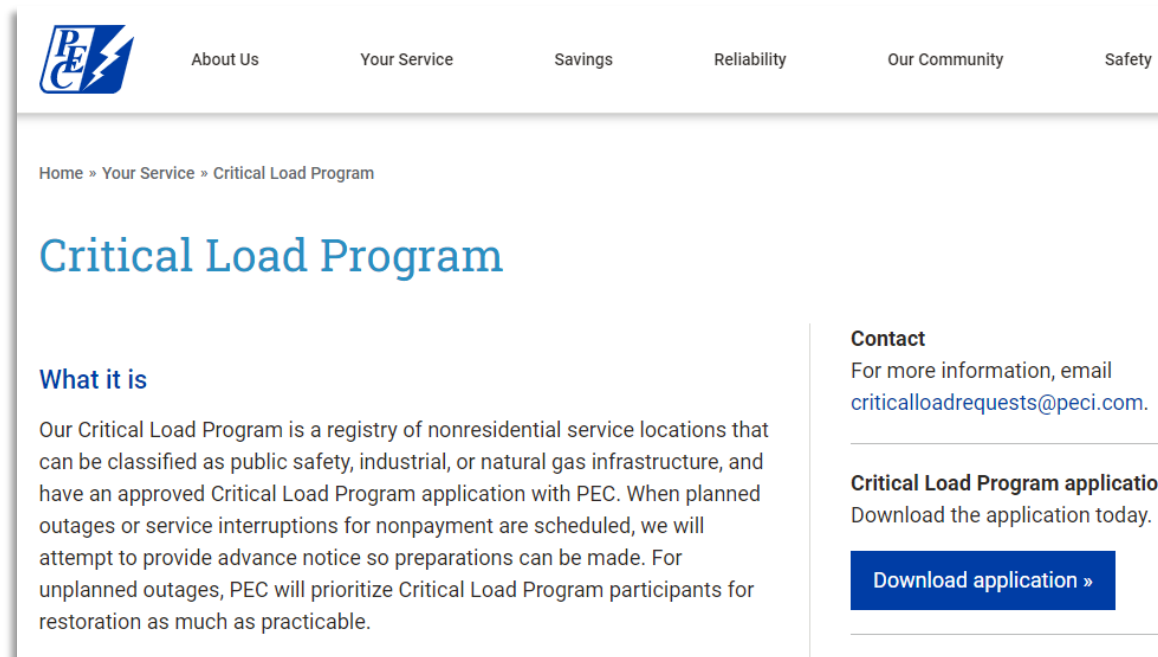
- Registered locations are not exempt from service interruptions, nor are registered members exempt from their financial responsibilities or the termination of service in accordance with PEC policies.

# Post-Storm Corrective Actions

- Staff have been meeting with members and attaining additional sites to add to the registry:
  - To-date, PEC has met with over 20 affected cities, utilities, and commercial members.
- Proactively reaching out to members that may have sites that are qualified to be on the registry:
  - To-date, PEC has sent communications to more than 200 eligible members.
- Obtaining additional information on critical load sites:
  - On-site, backup generation available - and if so, how much fuel is on-site.
  - Number of hours a site can be down before there is an issue.
  - Number of hours a site needs to be active to reset any issues.
- Enhanced system planning for load shed designations with lessons-learned from the February storm.
- Confirmed contact information for critical load sites are accurate.
- Monitored the Public Utility Commission of Texas to meet all requirements in a timely manner.

# How to Apply

- Visit the Critical Load Program website at [www.pec.coop/your-service/critical-load-program](http://www.pec.coop/your-service/critical-load-program)
- Download and complete the application, and submit to [CriticalLoadRequests@peci.com](mailto:CriticalLoadRequests@peci.com)
- For questions about the program, contact PEC's Commercial & Industrial Accounts team by phone, **830-454-3114**, or [CommercialAccounts@peci.com](mailto:CommercialAccounts@peci.com)





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