

**Before the Joint Committee on Energy and Environmental Policy
Comments by the
Staff of the Kansas Corporation Commission
November 20, 2012**

Thank you, Chairman Knox and members of the Committee. I am Leo Haynos, Chief of Gas Operations and Pipeline Safety for the Kansas Corporation Commission. I am appearing today on behalf of the KCC Staff to provide you with an update on the actions the KCC Staff has taken to plan for or respond to emergency situations. As you may know, within the KCC there are four operating divisions:

- Utilities, which includes operating sections for energy, telecommunications, and pipeline safety;
- The Energy Office which provides assistance for energy conservation and renewable energy projects;
- Conservation, which includes oil and gas production operations; and
- Transportation, which provides safety compliance and economic authority of the motor carrier industry.

For any of our divisions, our roles in emergency management may differ slightly but are mainly concerned with making sure the entities we regulate are prepared to respond to any type of emergency. The role of the KCC in emergency management is mainly concerned with preparedness. When an emergency occurs, our role is usually confined to providing information and making sure that our regulations that govern day-to-day normal operations do not hamper recovery efforts. We leave the execution of the emergency response plans to the experts who deal with utility operations on a daily basis.

Last year, when I appeared before this committee, I noted that the KCC was required by

K.S.A. 74-616(e)¹ to prepare an emergency management plan to prioritize the allocation of natural gas and electricity during an emergency declared by the Governor. I also noted that we had not met this statutory requirement but instead were relying upon guidelines listed in Emergency Support Function 12 of the Kansas Response Plan (KRP) developed by the Department of Emergency Management. After our testimony last year, the KCC Executive Director, Patti Petersen-Klein, became aware that while the utilities we regulate generally had preparedness plans in place to deal with emergencies when they occurred, the KCC did not have such a plan in place, she made the development of an emergency plan an agency priority. Because the Kansas Response Plan is intended to be a more conceptual plan or guideline for all emergencies that could occur in the state, Ms. Petersen-Klein further challenged Staff to develop a plan that augments the KRP, meets our statutory obligations, and provides a detailed road map for the KCC related to gas or electric emergencies. Today, I am pleased to announce to the Committee that we now have a KCC specific Emergency Management Plan in place. I have provided a copy of the body of the Plan² as an attachment to my testimony. This plan was developed as a team effort involving input from all of the various operating divisions of the KCC. Essentially starting with a blank sheet of paper -- and with the coaching and encouragement of our colleagues at KDEM -- the team developed a set of procedures that defines the KCC role during an emergency and provides an extensive list of industry contacts across the state. We believe this approach to be unique to Kansas state agencies and possibly a first for utility commissions across the nation. We are understandably proud of the work product presented to you today. In fact, the team was awarded the KCC Distinguished Performance Award for its efforts.

¹ K.S.A. 74-616(e) In administering the provisions of this act the state corporation commission shall:...(e) prepare an emergency management plan for natural gas and electric energy to be adopted during activation of emergency support function 12 of the Kansas response plan which plan shall include the system of priorities for natural gas and electric energy allocation and curtailment of energy resources consumption established under K.S.A. 74-620, and amendments thereto.

² The various appendices containing utility contact information are considered confidential and are not included in the attachment.

But the completion of the KCC Emergency Management Plan is only the beginning of the KCC role in emergency management. As I noted last year, Kansas statutes³ also require the KCC to promulgate regulations to implement the KCC Emergency Plan and to establish a system of priorities for the allocation of available supplies of energy if required during an emergency. We have developed rules and regulations to meet these obligations. At this time, we are in the final stages of internal review of the proposed regulations and within the week we will be requesting feedback on the proposed rules from the gas and electric public utilities regulated by the KCC as well as feedback from the associations that represent the municipal and cooperative utilities not traditionally regulated by the KCC for rates and practices. As part of our commitment to emergency management, the KCC Staff also will be serving with KDEM as co-coordinator of Emergency Support Function 12 of the Kansas Response Plan.

Over the last year, KCC Staff has gained substantial insight into emergency management. For us, the key to emergency management -- and our main role -- is preparedness. Once an event occurs, it is too late to prepare. For utilities, if a preparedness plan is not in place prior to an event, there is a great risk that the response effort would be forced to resort to ad hoc methods to try to complete the service restoration. It is our belief that most Kansas utilities have robust preparedness plans in place as evidenced by their successful response to past emergencies. The KCC Emergency Management Plan is a step toward assuring the public that the utilities' plans are effective. And at this point, I am pleased to add the KCC also has its own preparedness plan that will allow us to be more effective in providing the appropriate assistance to the utilities, other state agencies, and to the public.

This concludes my testimony and I would be happy to answer any questions you may have.

³ K.S.A. 74-616(a) and 74-620 require the KCC to adopt rules and regulations to administer the Emergency Management Plan.

KANSAS CORPORATION COMMISSION

Patti Petersen-Klein, Executive Director

Emergency Management Plan for Natural Gas and Electric Energy

to be adopted during activation of
Emergency Support Function 12 of the Kansas Response Plan

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Section 1.0 Preamble

Section 1.1 Purpose

The primary purpose of this Plan is to comply with statutory requirements. The Kansas Corporation Commission (KCC or Commission) is required by K.S.A. 74-616(a) and 74-616(e)¹ to prepare an Emergency Plan that addresses emergency situations related to natural gas and electricity shortages. The statute also requires the Commission to adopt rules and regulations to implement the Plan. In addition to the authority provided by K.S.A. 66-616 et seq. to implement an Emergency Plan, K.S.A. 48-907 provides authority to the Commission by virtue of the Kansas Department of Emergency Management (KDEM) authority to require assistance from state agencies. KDEM exercises this authority by publishing the Kansas Response Plan ESF 12 which assigns certain emergency related responsibilities to the Commission.

The secondary purpose of this Plan is to provide the procedures and plans for the Commission's responsibilities regarding emergency management. It identifies the role of the KCC in response to activation of Emergency Support Function 12 (ESF 12) of the Kansas Response Plan (KRP). This role is summarized as preparedness, response, recovery, and mitigation planning for emergencies related to shortages/outages of electricity and natural gas within the State of Kansas. The Plan also covers KCC responsibilities related to other duties as assigned by KDEM when ESF 12 is activated. Through ESF 12, KDEM has assigned the KCC the additional tasks of assisting KDEM in identifying potential areas of petroleum shortages and planning for transportation of petroleum products to affected areas.

The Plan provides key contacts for the following parties associated with emergency response:

- KCC personnel (Appendix A);
- Suppliers of natural gas (Appendix B, C, and D);
- Liquid Pipeline suppliers (Appendix D and E);
- Suppliers of Propane, retail and wholesale (Appendix I);
- Organizations associated with motor fuel and propane suppliers (Appendix J);
- Non-government organizations that organize mutual aid for energy suppliers (Appendix K);
- State and federal government agencies that are responsible for natural gas and electricity emergency preparedness and response (Appendix L).

ESF 12 is intended to mitigate energy emergencies that result from an "all-hazards"² perspective of emergencies related to natural gas or electric shortages/outages. The KCC's responsibility is to meet the requirements of ESF 12 assigned to the KCC. These requirements include monitoring the availability of electric utility generating capacity and reserves, the availability and supply of natural gas, and the supply of generation fuels. The KCC will also monitor and coordinate the restoration and prioritization of electric and natural gas services for normal community functioning. As assigned by ESF 12, the KCC also monitors transportation fuel shortages as requested by KDEM.

¹ These statutes are provided in Section 2.0 Statutory Requirement/Policy.

² "All-Hazards" can be described as a grouping classification encompassing all conditions, environmental or manmade, that have the potential to cause injury, illness, or death; damage to or loss of equipment, infrastructure services, or property; or alternatively causing functional degradation to social, economic, or environmental aspects.

Section 1.2 Scope

ESF 12 involves close coordination with the electric and natural gas utilities operating in the State to ensure that the integrity of the energy supply systems are maintained during emergency situations and that any damages that may be incurred are repaired and services restored in an efficient and expedient manner afterward. To accomplish this task, the Plan identifies the Kansas energy suppliers required to coordinate response efforts with the KCC and KDEM in response to activation of ESF 12. The Plan also identifies the expectations of the KCC regarding the supplier's obligations for preparedness, response, and recovery of an emergency. Both the KCC and the energy suppliers must be prepared to respond rapidly to a variety of energy emergencies in order to mitigate the potential consequences.

Section 1.3 Introduction

The main purpose of the KCC involvement in emergency management is to coordinate the activities of the energy suppliers with the needs and requirements of KDEM in managing the response to an emergency that has risen to the level of requiring state agency assistance. During the activation of ESF 12, there are three critical phases to an emergency. They are:

- Preparedness;
- Response; and
- Recovery.

Section 1.3.1 Preparedness

The preparedness phase is an ongoing process that involves programmatic efforts of each energy supplier to identify threats, determine vulnerabilities, and identify required resources. For the energy supplier, emergency preparedness is a critical factor that allows a supplier to respond quickly and safely to an emergency loss of energy to their customers. It includes having in place the processes, tools, and procedures needed to implement an energy supplier's Emergency Plan. Unless the supplier has both a complete Plan in place prior to an event and the tools needed to implement the Plan, its effort to restore service may become an uncoordinated exercise. This lack of structure may leave it without an accurate way of assessing damage, prioritizing restoration, or estimating restoration dates. Once an event occurs, it is too late to put these procedures into place. The utility is then forced to resort to ad hoc methods to try to complete the restoration. This is especially true of large, multi-day events which require a fundamentally different management approach than smaller events such as a storm, with limited damage or a localized planned outage.

Section 1.3.2 Response

The KRP provides the policies and processes for coordinating State response and support activities that address the short term, direct effect of an incident. The nature of these activities is to preserve life, property and the environment; meet basic human needs; and maintain the social, economic, and political structure of the affected community. During response, the KCC takes an active role in this phase on an emergency at the direction of KDEM and in accordance with the National Incident Management System.³ During an energy emergency, the State's role is one of support and coordination. The energy supplier that owns the damaged infrastructure is the primary respondent in any emergency. Each supplier will have an Emergency Operations Plan and is in the best position to assess the damage, formulate a Plan for restoration, and to execute the Plan. Energy Suppliers are also required to maintain mutual aid agreements with other energy suppliers and contractors within the region in order to have sufficient manpower to make repairs in the affected area in the shortest amount of time.

³ The National Incident Management System (NIMS) is an emergency management doctrine used throughout the nation to coordinate emergency preparedness and incident management among government agencies and the private sector.

When ESF 12 is activated, representatives of KCC Staff and the major utilities may be requested to be present in the State Emergency Operations Center (SEOC) to work as a team to help return the State to normal conditions in a safe and efficient manner. The KCC's responsibilities for this phase are related to providing information to KDEM that was developed in the preparedness phase, as well as monitoring and providing input to the ongoing activities of the response. Energy suppliers and KCC's emergency response procedures must provide for sufficient communication to energy providers and key response personnel. Utility commissions such as the KCC can only do their job well if the companies they regulate share information with them. Disaster recovery and emergency response functions are no different – they work on the basis of trusted communication and fail when that communication breaks down.

Section 1.3.3 Recovery

The recovery stage is specific to actions needed to help individuals and communities return to normal, when feasible. Recovery actions include the development, coordination and execution of Service and Infrastructure Restoration Plans. Requirements for restoration include a decision-making process for restoration priorities, as well as procedures to facilitate the influx of maintenance and damage assessment personnel from outside the region. It may also include making arrangements for waivers to expedite cross-state fuel shipments and to address weight and size restrictions for transporting critical energy system components. While restoration of normal operations at energy facilities is the primary responsibility of the owners of those facilities, ESF 12 provides the appropriate supplemental State assistance and resources to enable restoration in a timely manner with focus on restoring energy services vital to the health, welfare, and safety of the resident population. This Plan sets out the framework for prioritization of the restoration activity for each energy supplier.

Section 1.4 Assumptions

- The loss of energy infrastructure or a significant curtailment of service may have an immediate and, in some cases, long-term effect upon a community or region of the State. Regardless of the cause of an energy emergency, the prompt restoration of energy distribution systems is vital to the well-being of individual citizens and the economy of Kansas.
- Preparedness is a key component in emergency planning. A forward-leaning posture is imperative for incidents that have the potential to expand rapidly in size, scope, or complexity, and for no-notice incidents. As incidents change in size, scope, and complexity, the response must adapt to meet requirements.
- The KCC is required by K.S.A. 74-616(a) and 74-616(e) to adopt rules and regulations necessary for the administration of an Emergency Management Plan for natural gas and electric energy.
- K.S.A. 48-907(g) gives the Adjutant General the authority to require and direct the cooperation and assistance of state and local governmental agencies and officials.
- Incidents must be managed at the lowest possible jurisdictional level and supported by additional capabilities when needed. During an incident involving shortages of electricity and natural gas, the KCC monitors the response of the energy suppliers and takes an active role in response after the activation of ESF 12.
- Local community and regional energy system providers will act to restore their individual systems according to their Emergency Operations Plans. Restoration activities commence immediately (weather and access permitting) upon indication of service disruption. Restoration efforts include assistance obtained from other energy providers pursuant to mutual aid agreements, from contractors and, if needed, with assistance from state agencies.
- During the activation of ESF 12, the KCC staff assigned to the Emergency Management Plan works under the direction of KDEM and in accordance with the Incident Command Structure. Unified command enables agencies with different legal, jurisdictional, and functional responsibilities to coordinate, plan, and interact effectively.
- Engaged partnership includes ongoing communication of incident activity among all entities involved in the emergency which leads to shared situational awareness for a more rapid response.

- Electric generation and transmission capacities in Kansas are monitored and regulated by the Southwest Power Pool (SPP) which directs and regulates power generation and power transmission for the State of Kansas.
- The Electric Transmission System is built to North American Electric Reliability Corporation (NERC) standards. NERC governs the reliability of the Electric Transmission System. NERC's primary role in a wide spread emergency would be to understand the lessons learned in the recovery stage and to adopt those lessons learned to its standards for future construction and for any changes that may be required to the existing infrastructure. NERC standards can be found at www.nerc.com. From the NERC home page, click on Reliability Standards for a complete listing of all NERC reliability standards.
- Storage, transmission, and distribution supplies of natural gas are monitored and regulated by the Federal Energy Regulatory Commission (FERC) and the KCC. Any disruption or shortage of supply is addressed and resolved through high-level communications between the FERC, the KCC, private industry, and industry trade organizations.
- Distribution supplies of motor fuels are monitored by the Department of Energy in cooperation with the National Association of State Energy Offices (NASEO). Any disruption or shortage of supply is addressed and resolved through high-level communications between NASEO, the KCC, private industry, and industry trade organizations.

Section 1.5 Definitions

For the purpose of this Plan, these definitions apply:

“Critical Customer” means any customer on a life-support system who has provided appropriate documentation to the electric supplier that an interruption of service would be immediately life-threatening.

“Critical Infrastructure” means facilities vital for responding to emergencies and maintaining order for public safety and health, such as hospitals, emergency medical response facilities, fire and police stations, air traffic control centers, water and waste treatment facilities, and water pumping stations.

“Curtailed” means a supplier of energy is experiencing an event that requires the reduction of the use of energy and the supplier is working with its customers through prearranged agreements to load shed.

“Cyber Security” means the protection of all things pertaining to the Internet, from networks themselves to the information stored in computer databases and other applications, to devices that control equipment operations via network connections.

“Distribution System, electric” means all portions of an electric power system operating at less than 34.5 kilovolts and that deliver energy from the transmission system to customers.

“Distribution System, gas” means all portions of a natural gas piping system that delivers natural gas from a transmission pipeline to an end use customer.

“Electric Power System” includes those systems defined as Generation, Transmission, or Distribution.

“Electrical” means those components of an electric power system not subject to NERC or FERC jurisdiction.

“Emergencies”, as defined for this document, are determined by the Kansas Response Plan.

“Energy” means the electricity and natural gas provided to end use customers for purposes of life safety, daily living needs, and commercial uses.

“Energy supplier, electricity” means any supplier that operates electrical energy facilities.

“Energy Supplier, natural gas” means the operator of an intrastate natural gas pipeline involved in the transportation of natural gas. As such, all operators are subject to Kansas pipeline safety regulations found in K.A.R. 82-11-4 et seq.

“Energy System” means a system used to provide electrical or natural gas service to a user of that energy.

“Impediment” means a hindrance or obstruction to restoring energy to customers.

“Interruption” means a loss of energy service to one or more customers connected to the distribution system, and is the result of one or more component outages.

“Load Shed” means a supplier of energy has experienced an event that requires said supplier to turn off the flow of energy to customers.

“Major Electrical Energy Facilities” means any facility generating electricity with an output greater than 25 Megawatts (MW).

“Major Fuels” means those types of fuels, other than natural gas, most commonly used by the majority of the population of Kansas for heating or for transportation. In this case, major fuels are limited to motor fuels such as diesel, gasoline, and propane.

“Major Fuel Providers” are providers of major fuels for wholesale and retail markets.

“Major Natural Gas Facilities” means any compressor or gas processing facility that functions as part of an intrastate transmission pipeline.

“Outage” means the state of a component when it is not available to perform its intended energy delivery function due to an event directly associated with that component. An outage may or may not cause an interruption of service to customers, depending on system configuration.

“Planned interruption” means an interruption that results when the energy supplier or its qualified agent deliberately takes a component out of service at a selected time, usually for the purposes of construction, preventive maintenance, or repair. This is an interruption that the energy supplier, under its control, may have deferred.

“Storm Restoration” means the process by which an energy supplier restores its energy system to normal operations after unplanned interruptions due to natural hazards such as floods, tornados, winter storms, or lightning.

“Transmission System, electric” means all portions of an electric power system operating at 34.5 kilovolts or higher. This is often times referred to as “The Grid” or the “Transmission Network.”

“Transmission System, natural gas” means the pipeline system providing high pressure deliverability of natural gas.

“Unplanned interruption” means an interruption caused by an unplanned outage.

Section 2.0 Statutory Requirement/Policy

The KCC is required by K.S.A. 74-616(a) and 74-616(e) to prepare an Emergency Management Plan and adopt rules and regulations to implement the Plan.

Section 2.1 K.S.A. 74-616

74-616. State corporation commission; powers and duties relating to energy resources. In addition to other powers and duties provided by law, in administering the provisions of this act the state corporation commission shall:

- (a) Adopt rules and regulations necessary for the administration of this act;
- (b) develop a comprehensive state energy conservation plan and the procedures for implementing the plan according to federal requirements;
- (c) make requests for and accept funds and other assistance from federal agencies for energy conservation and other energy-related activities in this state, including, but not limited to, the state energy program;
- (d) administer federal energy conservation programs in this state;
- (e) prepare an emergency management plan for natural gas and electric energy to be adopted during activation of emergency support function 12 of the Kansas response plan established under K.S.A. 48-920 et seq., and amendments thereto, which plan shall include the system of priorities for natural gas and electric energy allocation and curtailment of energy resources consumption established under K.S.A. 74-620, and amendments thereto.

History: L. 1983, ch. 258, § 1; L. 1994, ch. 248, § 28; L. 2007, ch. 65, § 1; July 1.

K.S.A 74-616 (a) will be completed as a next step after this Plan is finalized.

K.S.A 74-616 (b), (c), and (d) are the responsibility of the Energy Division of the KCC. A copy of the Kansas Energy Conservation Plan can be found in Appendix M.

The obligations of the KCC found in K.S.A. 74-616 (e) are accomplished by the publication of this Plan.

Section 2.2 K.S.A. 74-620

74-620. Same; system of priorities for energy resource allocation; rules and regulations. The state corporation commission shall adopt rules and regulations establishing a system of priorities for the allocation of available natural gas and electric energy or for the curtailment of the consumption of such natural gas and electric energy, or both, during an activation of emergency support function 12 of the Kansas response plan proclaimed by the governor pursuant to K.S.A. 48-920 et seq., and amendments thereto. Such rules and regulations shall apply to all suppliers and consumers of natural gas and electric energy.

History: L. 1983, ch. 258, § 5; L. 2007, ch. 65, § 3; July 1.

Section 2.3 Emergency Support Function (ESF) 12

A hard copy of ESF 12 can be found in Appendix N. An electronic copy is available at: http://www.kansastag.gov/AdvHTML_doc_upload/2011%20Final%20Plan.pdf.

Section 2.4 Rules and Regulations

As required by K.S.A. 74-616(a), rules and regulations will be promulgated by the KCC in order to implement this Plan and address the emergency response requirements of electric or natural gas suppliers. The rules and regulations also will provide the minimum provisions to be included in a supplier's Emergency Response Plan. Rules and Regulations can be found in Appendix O.

Section 3.0 Type of Emergency

Emergencies that affect the KCC are related to Electrical Power Systems or the Natural Gas Systems in Kansas. Emergencies typically can be grouped in the categories of Load Shed or Curtailment, Storm Restoration, or Loss of a Major Component of the System (e.g. Electrical might be the loss of a Generation Unit or Transmission Line; Natural Gas might be the loss of a Pipeline or Storage Facility).

Section 3.1 Electrical

Electrical emergencies occur when there is a loss of electricity to customers that threatens life or property. Electrical emergencies that will typically involve activation of ESF 12 are those that involve widespread loss of electricity. Usually this loss of electricity would be related to a weather event such as a tornado, but it could include capacity constraints on transmission lines that affect a large number of customers. Loss of a transmission line can occur for any number of reasons such as equipment failure or constraining conditions that have maximized the amount of power moving on a line. Electricity outages could also occur as the result of losing a generation unit.

Electrically, the loss of distribution facilities is an area where the KCC will have the highest involvement and the greatest ability to effect change. The loss of transmission facilities will be directed by SPP and the KCC will have involvement, albeit, to a lesser degree. NERC will have greater involvement during the loss of transmission and generation.

Frequency (reliability) emergencies are the result of a generation unit unexpectedly dropping off the transmission system or is the result of a transmission line suddenly becoming unavailable. These types of sudden loss cause a drop in voltage on the transmission system.

When a generation unit suddenly drops from service, the result can be a reduction in the frequency on the transmission system which, if left uncorrected, can cause brown outs and systemic failure of the power grid. This type of sudden loss is corrected by removing load from the grid to keep the frequency at 60 Hz.

Likewise, if a segment of the transmission grid were to be suddenly lost, the nature of electricity is that it will reroute itself through the path of least resistance. This uncontrolled or self controlled rerouting of large amounts of power can easily overload other parts of the transmission grid, again causing systemic failures of the transmission grid. This type of sudden loss is also corrected by removing load from the grid to prevent overloading and shutdown of the transmission grid.

Section 3.1 Natural Gas

Natural gas emergencies occur when there is a loss of supply to customers or a situation such as leaking gas that threatens life or property. Natural gas emergencies that will typically involve activation of ESF 12 are those that involve widespread loss of supply. Usually, this loss of supply would be related to a weather event such as a tornado, but it could include loss of supply from an interstate transmission supplier that affects a large number of customers. Loss of transmission line supply can occur for any number of reasons such as equipment failure or pressure failure. Because natural gas is predominantly used to supply heat energy, the loss of natural gas supply becomes more critical during times of cold weather.

Section 4.0 KCC Responsibilities

Section 4.0 defines the responsibilities of the KCC during an ESF 12 event. The KCC has responsibilities in the areas of preparedness, response, recovery, and mitigation.

Section 4.1 Emergency Management Internal Operating Procedure

The Emergency Management Internal Operating Procedure (IOP) is the document that will direct the specific duties of KCC Staff upon activation of ESF 12 and in the maintenance of this Plan. The IOP provides responsibilities and authorities for KCC personnel that will be tasked with emergency response functions. The IOP can be viewed through the agency's internal website at <http://kcc.ks.gov/personnel/iop.htm> and a hard copy of the IOP can be found in Appendix P.

The IOP contains:

- Directions to begin the Emergency Response phase of an emergency;
- Maintenance of the KCC Emergency Management Plan;
- Directions for SEOC Participation; and
- Questions to be asked of Utilities and Major Fuel Providers during an event.

Section 4.2 Preparedness

ESF 12 directs the KCC on two issues related to preparedness:

- Coordinate with electrical utilities and major fuel providers to determine response needs and priorities during an emergency; and
- Maintain current inventories of major energy facilities, pipelines, equipment, special capabilities and personnel throughout the State.

Emergency preparedness is a critical factor in emergency planning that allows a supplier to respond quickly and safely to an emergency loss of energy to their customers. It includes having in place the processes, tools, and procedures needed to implement an energy supplier's Emergency Plan. Unless the supplier has both a complete Plan in place prior to an event and the tools needed to implement the Plan, its effort to restore service may become an uncoordinated exercise.

For these reasons, this Plan requires each energy supplier to prepare an Emergency Plan for its operation. Furthermore, the supplier is required to file an annual statement with the KCC providing assurance that the supplier's Emergency Plan meets the minimum provisions outlined in this document.

KCC Staff will request each energy supplier to annually provide a written attestation that its Emergency Plan includes a prioritization of service.

Section 4.2.1 Preparedness: Electrical Suppliers

ESF 12 directs the KCC to coordinate with electrical utilities to determine response needs and priorities during an emergency. When an emergency event occurs and KDEM activates ESF 12, the KCC responds based on Section 4.3 of this Plan.

Section 4.2.1.1 Preparedness: Determine response needs during an emergency

The KCC staff maintains a contact list for all suppliers of electricity. This list can be found in Appendix F. Each electric supplier will provide the KCC Staff with notice of any planned interruptions that may result in widespread outages upon becoming aware of such events. Once received, Staff will forward such notice to the Executive Director and Utilities Division Director. In order to prepare for activation of ESF 12, the KCC maintains a contact list (Appendix A) and a

standard checklist of questions to be used when determining response needs (see Section 4.3.1). For actions to be taken by KCC personnel, see the IOP found in Appendix P of this Plan.

Supplier Curtailment Plans and Restoration Plans will address the needs of “critical customers” and “critical infrastructure” as defined in Section 1.5 of this Plan.

Section 4.2.1.2 Preparedness: Determine priorities during an emergency

As provided by regulations discussed in Section 2.4, each Electrical Distribution System operator is required to have a Plan for the curtailment of electricity to its customers should the supply of electricity become limited. The Curtailment Plan must address the priority of curtailing power to various categories of customers such that those categories of critical facilities (e.g.: hospitals, prisons, nursing homes) that are the last customers to be turned off or will be turned off for the least amount of time.

Conversely, each operator must have a Plan that addresses the prioritization of restoring service to its customers. Although prioritization of service to critical infrastructure is required, safety of the customer is paramount when restoring electrical service. The prioritization schedule will essentially be the reverse of the schedule developed for curtailment.

The Commission issued an Order related to these matters in Docket 02-GIME-365-GIE on October 4, 2004. In its Order, the Commission included Electric Reliability Requirements (ERR) for those utilities jurisdictional to the Commission under Chapter 66 of the Kansas State Statutes. This document can be found in Appendix Q of this Plan.

This Plan requires each electric energy supplier, as defined in Section 1.5, to establish procedures that follow the same basic sequence of steps listed in the ERR:

1. Eliminate any conditions that are hazardous to public safety;
2. Restore service within the shortest time practicable;
3. For multiple interruptions, give priority to restoring service to critical public service facilities without an operable alternate power supply; and
4. Restore the greatest number of customers in the shortest time.

KCC Staff will request each electrical supplier annually to provide a written attestation that its Emergency Plan includes a prioritization of service.

Section 4.2.2 Preparedness: Natural Gas Suppliers

ESF 12 directs the KCC to coordinate with major fuel providers to determine response needs and priorities during an emergency. Natural Gas suppliers are considered a major fuel provider. When an emergency event occurs and KDEM activates ESF 12, the KCC responds based on Section 4.3 of this Plan.

Section 4.2.2.1 Preparedness: Determine response needs during an emergency

The natural gas supplier is responsible to determine its response needs after an emergency has occurred. Through the implementation of Section 4.3 of this Plan, the KCC will query the supplier on the status of its response and coordinate with KDEM and mutual aid organizations for any additional aid that is necessary. As part of the coordination effort, the KCC will rely on the natural gas operators contact list found in Appendix B, C, D, and E in order to survey natural gas suppliers in the area of an emergency.

The Restoration Plan will address the needs of “critical customers” and “critical infrastructure” as defined in Section 1.5 of this Plan.

Section 4.2.2.2 Preparedness: Determine priorities during an emergency

Each natural gas operator is required to have a Plan for the curtailment of natural gas to its customers, should the supply of gas become limited. The Curtailment Plan must address the priority of curtailing supply to various categories of customers such that those categories of critical facilities (e.g. hospitals, prisons, nursing homes) have access to the limited supply for the greatest amount of time. Curtailment may be performed by shutting off supply to the category of customer identified for immediate curtailment and monitoring the remaining pressure of the gas system. If the system pressure continues to decline, additional categories of customers may be curtailed or sections of the system may be isolated, as required. For natural gas public utilities regulated under K.S.A. Chapter 66, the curtailment criteria found in Docket 106,210, located in Appendix R, or the most recent tariff on file with the KCC will determine the curtailment priorities. In general, these categories are listed as follows:

- Residential Sales customers and customers taking service which if curtailed would endanger human life or safety shall be the last category of customers to be curtailed if supply is limited. A customer shall not be considered endangered if an alternate fuel capability is feasible.
- Customers taking firm service under the supplier's rate schedules which if curtailed would endanger property shall be the second category to be curtailed if supply is limited. A customer shall not be considered endangered if an alternate fuel capability is feasible or if curtailment affects customer productivity.
- Interruptible customers and those customers not noted above shall be the first category of customers to be curtailed if supply is limited.

Should only partial service capacity be available for an affected category, deliveries within that category shall be limited to a customer's pro rata share of service available to that category. This share shall be based on the ratio of the customer's requirement in the category for which partial capacity is available to the sum of all customers' requirements in the same category.

Conversely, each operator must have a Plan that addresses the prioritization of restoring service to its customers. Although prioritization of service to critical infrastructure is required, safety of the customer is paramount when restoring natural gas service. The prioritization schedule will essentially be the reverse of the schedule developed for curtailment.

Storm events that affect pipelines can result in leaks to the underground system that are difficult to detect. Therefore, every Restoration Plan related to a storm event should include a leak survey or pressure test of the affected system before introducing gas back into the pipeline.

As noted in the introduction to Section 4.2, each energy supplier is required to provide an annual certification of its Emergency Plan which includes curtailment and service restoration priorities. KCC Staff will review the certifications within 60 days of receipt and provide feedback to suppliers as necessary.

In addition to Curtailment Plans, each energy supplier of natural gas is required to have an Emergency Plan that addresses minimizing hazards to life and property, including:

- Receiving, identifying, and classifying notices of events which require immediate response by the operator.
- Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.
- Prompt and effective response to a notice of each type of emergency, including the following:

- (i) Gas detected inside or near a building;
 - (ii) Fire located near or directly involving a pipeline facility;
 - (iii) Explosion occurring near or directly involving a pipeline facility; and
 - (iv) Natural disaster.
- The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.
 - Actions directed toward protecting people first and then property.
 - Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.
 - Making safe any actual or potential hazard to life or property.
 - Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.
 - Safely restoring any service outage.
 - Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.
 - Actions required to be taken by a controller during an emergency in accordance with §192.631.

Section 4.2.3 Preparedness: Major Fuel Providers

ESF 12 directs the KCC to coordinate with major fuel providers to determine response needs and priorities during an emergency. When an emergency event occurs and KDEM activates ESF 12, the KCC responds based on Section 4.3 of this Plan.

Section 4.2.3.1 Preparedness: Determine response needs during an emergency

Section 4.2.3.1.1 Transportation Fuels: During response to an emergency, ESF 12 directs the KCC to identify potential areas of petroleum shortages and plan for transportation of petroleum products to affected area. In order to prepare for these tasks, the KCC will establish contacts with the Petroleum Marketers and Convenience Store Association in Kansas (PMCA). PMCA has members throughout the state. By surveying its members, PMCA will be able to provide the necessary intelligence of potential fuel shortages that may develop across the state. The KCC will rely on the PMCA contact list and on PMCA for notification of developing events. The contact list for PMCA is found in Appendix J. Additionally, a list of trucking companies capable of supplying fuel can be found in Appendix H.

Section 4.2.3.1.2 Propane: For propane, the KCC will determine response needs by establishing contacts with the Propane Marketers Association of Kansas (PMAK). PMAK has members throughout the state. By surveying its members, PMAK will be able to provide the necessary intelligence of potential propane shortages that may develop across the state. The KCC will rely on the PMAK contact list and on PMAK for notification of developing events. The contact list for PMAK is found in Appendix J. Additionally, a list of trucking companies capable of supplying fuel can be found in Appendix H.

Section 4.2.3.2 Preparedness: Determine priorities during an emergency

During an emergency, KCC will coordinate with KDEM, PMCA, and the Kansas Motor Carriers Associations (KMCA) to develop fuel supply prioritization. In general, this priority schedule will vary depending on conditions; however, it should follow the same general principles found in responding to any energy emergency of protecting life then property. Priority categories are as follows:

1. Assure fuel is available to emergency first responders dealing with health and safety of the public. This category would include police, fire, ambulance, and backup generation for critical facilities.
2. Provide fuel for energy supplier crews working to restore electric and natural gas service.
3. Provide fuel for customer heating purposes if the emergency occurs in the winter. Typically this would pertain to supplies of propane.
4. Provide fuel to retail outlets for general public transportation uses.

Section 4.2.4 Preparedness: Maintain current inventories

ESF 12 directs the KCC to maintain current inventories of information that may be useful in responding to an emergency related to energy shortages. Because the KCC's role in an emergency event is one based primarily on communication, this section either provides information on the energy infrastructure in Kansas or it provides contacts that can be used to acquire that information in real time.

Section 4.2.4.1 Preparedness: Electricity

Section 4.2.4.1.1 Preparedness: Electricity Major Facilities: A current inventory of electrical generating plants can be found in the document titled "Kansas Generation Planning Survey." An inventory of electric generating facilities operated by Kansas municipalities can be found in the document titled: "KMU IC Generation Summary-2." Both of these documents are electronically archived on the KCC Server and are available to KCC Staff at the following address: \\Topeka\Public\Power Production. At this address, click the year desired followed by the utility type and the company name for a specific report. If parties outside of the KCC wish to access these electronic documents, please contact the KCC Utilities Division Director.

Section 4.2.4.1.2 Preparedness: Inventories of Pipelines: This section is not used, as Electrical facilities do not provide a service that requires pipelines.

Section 4.2.4.1.3 Preparedness: Electrical: Equipment and Special Capabilities: Because the nature of overhead and underground wiring systems, electrical energy suppliers have access to bucket trucks, digger/derrick trucks (used for drilling holes for setting poles), tugging trucks (used for pulling wire), and have personnel trained to enter confined spaces. The Kansas Water, Wastewater, Gas, and Electric mutual aid program provides lists of equipment that may be available and can be accessed through the Kansas Municipal Utilities web site <http://www.ksmap.org/ksmap/users/>.

Other contacts for these companies are found in the Contacts for Electrical Energy Suppliers list. A version of this document current as of April 13, 2012, is found in Appendix F.

Section 4.2.4.1.4 Preparedness: Electrical: Personnel Throughout the State: The inventories of personnel available for electrical activities varies with each company. By using the contact list of electrical suppliers found in Appendix F: Contacts for Electrical Energy Suppliers, personnel availability on the company level can be obtained in real time. With the expectation that all utilities will develop mutual aid programs, additional inventories can be obtained based on mutual aid program databases.

Section 4.2.4.2 Preparedness: Natural Gas and Pipelines

Section 4.2.4.2.1 Preparedness: Natural Gas Major Facilities: The natural gas delivery system in Kansas has a large number of interconnections between intrastate and interstate pipeline systems. Major natural gas facilities are composed of compressor stations, underground storage, and gas processing plants that serve the intrastate gas transmission system. All of the compression on intrastate natural gas transmission lines are operated by ONEOK, Inc. A list of

major compression facilities serving intrastate transmission can be found in Appendix D. In addition to the ONEOK transmission systems, delivery pressure for natural gas is supplied from interstate transmission systems and storage fields. All of these operations are subject to FERC jurisdiction and reporting requirements. FERC Form 2 provides high level information regarding the delivery capacity of the interstate systems. A copy of FERC Form 2 for all transmission systems is electronically archived on the KCC Server and is available to KCC Staff at the following address: \\Topeka3\Utilities\UtilitiesPublic\AnnualReports. If parties outside of the KCC wish to access these electronic documents, please contact the KCC Utilities Division Director. Appendix C provides contacts for all intrastate natural gas transmission pipeline operators, and Appendix D provides contacts for all interstate transmission pipelines and storage fields.

Section 4.2.4.2.2 Preparedness: Inventories of Natural Gas and Liquid Pipelines: There are three categories of pipelines that serve the State of Kansas. They are:

1. Intrastate natural gas pipelines;
2. Interstate natural gas pipelines; and
3. Intra/interstate liquids pipelines.

Liquids pipelines carry all unrefined liquid products such as crude oil and natural gas liquids as well as refined products such as diesel fuel, gasoline, propane, and aviation fuel. The same pipeline may carry multiple products depending on its configuration.

An inventory of Intrastate Natural Gas Pipelines is available on the KCC pipeline safety database, which is electronically maintained on the KCC Server and is available to KCC Staff at the following address: \\Topeka3\utilities\Util-Pipeline\Util - Pipeline Shared\2012 DATA. The file is accessed using FilePro software. If parties outside of the KCC wish to access these electronic documents, please contact the KCC Utilities Division Director. A copy of the operators' contact information current as of April 13, 2012, can be found in Appendix B: Contacts for Natural Gas Suppliers (Local Distribution) and Appendix C: Contacts for Intrastate Natural Gas Transmission Pipeline Operators.

An inventory of Interstate Natural Gas Transmission Pipelines is available by contacting PHMSA central region at 816-329-3817. An inventory is also available in the Interstate Natural Gas Transmission Operators - Kansas.xls. A version of this document current as of April 13, 2012, is found in Appendix E: Natural Gas and Hazardous Liquid Pipeline Inventory in Kansas. Appendix D provides contact information for all natural gas storage facilities in Kansas.

Mapping Tools for Utility Infrastructure

- Maps of intrastate natural gas pipelines are uploaded into the KansasMAP database on the KDEM server: <https://maps.kansastag.gov/Kansas-MAPv2/>
- Other maps are available by contacting PHMSA or through the National Pipeline Mapping System: <https://www.npms.phmsa.dot.gov/>
- A gas gathering system map viewer is available at: <https://maps.kansastag.gov/Kansas-MAPv2/>

Section 4.2.4.2.3 Preparedness: Natural Gas and Pipelines: Equipment and Special Capabilities: Transmission pipeline operators often use "bottle trucks" or "cascade systems" to provide supplies of natural gas for a limited time period. For access to these types of equipment, the Plan suggests contacting Southern Star (David Sinclair, David.L.Sinclair@sscgp.com) or Kansas Gas Service (Lynn Crouse, lcrouse@kgas.com; 620.728.4304).

Because the nature of pipeline operations requires excavation, most if not all pipeline operators have access to excavating equipment. The Kansas Water, Wastewater, Gas, and Electric mutual

aid program provides lists of equipment that may be available and can be accessed through the Kansas Municipal Utilities website: <http://www.ksmap.org/ksmap/users/>.

Other contacts for these companies are found in Kansas Pipeline Alliance phone list. A version of this document current as of April 13, 2012, is found in Appendix D: Contacts for Operators of Natural Gas Transmission Pipelines, Hazardous Liquid Transmission Pipelines, Gas Storage Field Operators, and Natural Gas Compressor Stations on Intrastate Transmission Pipelines in Kansas.

Section 4.2.4.2.4 Preparedness: Natural Gas and Pipelines: Personnel Throughout the State: The inventories of personnel available for pipeline activities varies with each company. By using the contact list of pipeline operators found in Appendix B, C, D, and E as well as Appendix G: Contacts for Motor Fuel Supply Terminals, personnel availability on the company level can be obtained in real time. With the expectation that all utilities will develop mutual aid programs, additional inventories can be obtained based on mutual aid program databases.

Section 4.2.4.3 Preparedness: Transportation Fuels and Propane (TF&P)

Section 4.2.4.3.1 Preparedness: TF&P Major Facilities: Major fuel providers provide retail access to transportation fuels such as gasoline and diesel and to heating fuels such as propane. Working with the marketing organizations for motor fuels and propane, PMCA and PMAK, respectively, KCC Staff has included a contact list for the membership from these organizations. The marketing memberships are considered to provide an accurate inventory of the facilities available to provide these fuels and can be found in Appendix I.

In addition to the retail marketers, Appendix G includes a map of the truck loading terminals in the Kansas region for motor fuels.

Section 4.2.4.3.2 Preparedness: Inventories of Transportation Fuel and Propane Pipelines: An inventory of liquid pipelines is available by contacting PHMSA central region at 816-329-3817. An inventory is also available in the Hazardous Liquid Pipeline Operators – Kansas.xls. A version of this document current as of April 13, 2012, is found in Appendix E: Natural Gas and Hazardous Liquid Pipeline Inventory in Kansas, and Appendix G: Contacts for Motor Fuel Supply Terminals.

Section 4.2.4.3.3 Preparedness: TF&P: Equipment and Special Capabilities: As a general rule, motor fuels have access to pressurized truck transport for fuel deliveries and the ability to deliver to remote sites. Because of the nature of pipelines, most pipeline companies have access to large excavation equipment, as well as parts for pumps and compressors. Appendix H provides a contact list of trucking firms capable of fuel delivery. Appendix E provides an inventory of Liquid Pipeline Operators as well as Natural Gas Pipeline Operators in Kansas. Contact lists for interstate transmission pipeline operators can be found in Appendix D.

Section 4.2.4.3.4 Preparedness: TF&P: Personnel Throughout the State: The inventories of personnel available for pipeline activities varies with each company. By using the contact list of pipeline operators found in Appendix B, C, D, and E as well as Appendix G: Contacts for Motor Fuel Supply Terminals, personnel availability on the company level can be obtained in real time. With the expectation that all utilities will develop mutual aid programs, additional inventories can be obtained based on mutual aid program databases.

Section 4.2.4.4 Preparedness: KCC Agency Equipment

Section 4.2.4.4.1 Preparedness: KCC: Equipment and Special Capabilities: An inventory of KCC trucks and vehicles can be obtained from the Chief Financial Officer in the Fiscal Office. In addition, an inventory found on Oracle IT's assets (computers/servers/visual communication systems) can be obtained from the Director of Information Technology.

The KCC can offer a network of contacts to the various utilities operating within the State of Kansas, with a tendency towards regulatory and policy focused employees.

Section 4.2.4.4.2 Preparedness: KCC: Personnel Throughout the State: An inventory of the KCC's employees can be obtained from the Director of Human Resources via the Oracle database. If Human Resources is unavailable, similar data can be obtained via the Department of Administration's Office of Human Resources at 785.296.4278. In addition, Human Resources can provide a standardized organizational chart or pictorial directory for reference. The Continuity of Operations Plan (COOP) maintained online at COOPKansas.com also maintains a listing of functions and assignments for the KCC's employees.

Section 4.2.5 Preparedness: Cyber Security

Cyber security is a key aspect of preparedness for energy suppliers. The KCC will coordinate with both electric and natural gas utilities to ensure that cyber security measures are addressed in the utilities emergency planning efforts.

Section 4.2.5.1 Preparedness: Cyber Security of Electrical Suppliers

The electric energy supplier is responsible for including in its emergency planning efforts, information related to direct threats to electricity generation routing/transmission and distribution. These efforts may include threats to such systems as its control systems in generation plants, threats to transmission control systems, threats to distribution control systems such as the misapplication of digital data that could cause problems where no physical problem actually exists, and threats to customer facilities, especially those with smart meter technology. Additionally, the electric energy supplier is responsible for including preparedness information related to ancillary threats to personal or proprietary information such as unauthorized users gaining information to customer billing data and meter data. Finally, the electric energy supplier is responsible for including in its planning efforts, information related to cyber threats to its communication systems.

Section 4.2.5.2 Preparedness: Cyber Security of Natural Gas Suppliers

The natural gas energy supplier is responsible for including in its emergency planning efforts, information related to direct threats to compression and storage facilities, transmission and distribution lines. These efforts may include threats to such systems as control systems in compression stations, threats to valve control systems, threats to distribution control systems such as the misapplication of digital data that could cause problems where no physical problem actually exists, and threats to customer facilities, especially those with smart meter technology. Additionally, the natural gas energy supplier is responsible for including preparedness information related to ancillary threats to personal or proprietary information, such as unauthorized users gaining information to customer billing data and meter data. Finally, the natural gas energy supplier is responsible for including in its planning efforts, information related to cyber threats to its communication systems.

Section 4.3 Response

The KRP provides the policies and processes for coordinating State response and support activities that address the short term, direct effect of an incident. The nature of these activities is to preserve life, property and the environment; meet basic human needs; and maintain the social, economic, and political structure of the affected community. During response to an energy emergency, the KCC's role is one of support and coordination. The energy supplier that owns the damaged infrastructure is the primary respondent in any emergency. Each supplier will have an Emergency Operations Plan and is in the best position to assess the damage, formulate a plan for restoration, and to execute the plan. The KCC's responsibilities for this phase are related to providing information to KDEM that was developed in the preparedness phase, as well as monitoring and providing input to the ongoing activities of the response. The KCC's Internal Operating Procedure referenced in Section 4.1 of this Plan provides specific instructions and responsibilities for KCC personnel during this phase of an emergency.

ESF 12 directs the KCC on eight issues related to response:

1. Provide, in coordination with private utility providers, initial damage assessment (type of emergency, location, critical infrastructure affected, etc.);
2. Identify impediments to the emergency restoration of utility services;
3. Coordinate with utility companies to prepare and release public information regarding the emergency;
4. Identify potential areas of petroleum shortages and plan for transportation of petroleum products to affected area;
5. Serve the Kansas SEOC Team in various areas of Field Operations (i.e., the Forward State Emergency Response Team, Impact Assessment Teams: Rapid Response Team, PDA Team, JFO operations, Recovery Center Operations, intrastate and/or interstate mutual aid assistance, etc.) ;
6. Request, when appropriate, needed resources to repair damaged electric systems, natural gas systems and related public infrastructure;
7. Facilitate public utilities communication with local, state, and federal agencies and organizations when responding to energy emergencies and energy service restoration; and
8. Monitor electric utilities and other support agencies and organizations responding to and recovering from emergencies regarding electric generating capacity, shortages, electric generating fuel shortages, transmission and distribution line outages, and electrical service outages affecting the public.

Section 4.3.1 Response: Provide Initial Assessment

ESF 12 directs the KCC to provide, in coordination with private utility providers, initial damage assessment (type of emergency, location, critical infrastructure affected, etc.).

Upon activation of ESF 12, the KCC's Utilities Division Director will be responsible for contacting the utilities affected by the emergency event. During the contact, a time shall be established to receive more detailed information from each utility affected. This may take the form of email updates from the utilities, conference call phone bridge numbers provided for the Commission Staff to listen to the utility internal update and progress meetings, or a separate call from the utility updating the Commission Staff.

During the first contact, the Utilities Division Director or their designee will determine the type of emergency, the general cause of the event, locations affected, the numbers of customers without electricity or natural gas service, whether the utilities believe they have peaked the number of customer outages or do they expect the numbers to increase.

It is recommended that two conference calls be held daily until such time as one conference call update will be sufficient to communicate information and update the Commission Staff for the purpose of further reporting of data and numbers caused by the event.

Section 4.3.1.1 Response: Damage assessment

During the first contact with each utility, the information in the following sections shall be collected and determined.

Section 4.3.1.1.1 Response: Type of Emergency: State the type of event that caused the emergency; for example: Thunderstorm; Ice Storm; Earthquake; Flood; Tornado, etc.

Electrical emergencies typically involve either load shedding (taking customers off the system) or storm restoration (putting customers back on the system).

Load shedding is typically performed by shutting off electricity, at a substation circuit level, to the category of customer identified for immediate load shed and continuing the process until the load or demand of the customers matches the amount of power available. If the system voltage or frequency continues to decline, additional categories of customers may be curtailed or sections of the system may be isolated, as required.

Section 4.3.1.1.2 Response: Location

Determine which counties and cities in the State of Kansas were affected by the event. Determine if this is an isolated coverage area (e.g. Tornado) or is this event statewide (e.g. Thunderstorm or Ice Storm).

Section 4.3.1.1.3 Response: Critical Infrastructure affected

Gather information from the affected utilities and compile a list of critical infrastructure that is without electricity or natural gas. Request from the utility the number of each type of facility defined under critical infrastructure.

Section 4.3.1.1.4 Response: Other

Gather all other information available from the utility during the update phone calls. Request from each effected utility:

- The number of customers out;
- The estimated time that all customers will be restored;
- The number of contractors hired to support restoration efforts;
- Whether the utility has the materials it needs on hand; and
- If not, identify the shortage materials.

Section 4.3.2: Response: Utility Service

ESF 12 directs the KCC to identify impediments to the emergency restoration of utility services during an emergency. When an emergency event occurs and KDEM activates ESF 12, impediments to the event must be identified.

Section 4.3.2.1 Response: Identify impediments

During the initial assessment made by the Utilities Division Director and all follow-up conference calls as required by Section 4.3.1, the KCC will request from the effected utilities a list of impediments and explain that this list will be passed up to KDEM to determine what, if anything, the SEOC can do or provide to aid the restoration efforts of the utility.

For Electric suppliers:

- Identify which power plants are unavailable;
- Identify which transmission lines are unavailable;
- Identify which substations are unavailable;
- Identify which distribution components are unavailable or experiencing a shortage or if the utility is unable to obtain this material;
- Identify Debris fields blocking access;
- Communications;
- Public Infrastructure; and
- Vegetation.

For Natural Gas suppliers:

- Compressor Station availability;
- Pipeline capacity;
- Deliverability pressure;
- Debris fields blocking access;
- Communications;

- Public Infrastructure; and
- Vegetation.

Impediments will be reviewed under Section 4.4.2 during the debriefing meeting. When it is possible to mitigate an impediment during future events, a report and recommendation to the Commission will be written suggesting the improvement.

Section 4.3.3 Response: Release of Public Information

During an energy emergency, the KCC's responsibility is to communicate, coordinate, aid, and assist. The private sector's responsibility is to repair damage and get commercial and industrial systems back on track as soon as possible. These actions are achievable through communication, cooperation, and reliance on the voluntary action of communities, suppliers, and Kansas citizens. One of the most effective crisis management actions the State can take during an energy emergency is to provide timely and accurate information on the energy situation. This can help prevent confusion and uncertainty, as well as enlist the support and cooperation of the various sectors of the economy.

In order to ensure timely and accurate information is being disseminated during the emergency, a three member Emergency Communication Team will be established. The KCC Executive Director, Utilities Division Director, and Public Affairs and Consumer Protection Director will make-up the Emergency Communication Team (Team). Upon activation of ESF 12, the Team will convene and make critical communication decisions regarding information that is appropriate and necessary to disseminate to stakeholders, the news media and general public. The Team will act at the direction of KDEM. Any Team member can invite staff to participate as they deem appropriate.

Key stakeholders in the public affairs effort include the Adjutant General's office, state agencies, local governments, the energy supply industry, and private sector entities. Communications between these key groups with information about the nature, severity, and possible duration of the energy emergency is essential. It is also vital that the public clearly understands exactly what the energy emergency situation is and what needs to be done to successfully address the energy emergency.

Section 4.3.3.1 Response: Prepare information

Sections 4.3.1 and 4.3.8 of this Plan address the types of information that KCC Staff will acquire as part of responding to an emergency. This information will be reported to the KCC Staff during regularly scheduled updates between KCC, KDEM, energy suppliers, and first responders. As part of preparing for an emergency event, the rules and regulations found in Section 2.4 of this Plan require energy suppliers to:

- Develop and implement a written continuing public education program that addresses safety around the type of energy provided by the utility (electricity or natural gas) and emergency procedures for homes and businesses, and provides updates of the status of a recovery effort;
- Provide after action reports to appropriate state agencies; and
- Establish and track effectiveness parameters such as number of crews working; rate of customer restoration; number of customer complaints; and average hold time during an emergency.

Section 4.3.3.2 Response: Release public information regarding the emergency

Upon the determination of an energy emergency and after consulting with members of the Emergency Communication Team, the Public Affairs and Consumer Protection Director will:

- Prepare talking points regarding the energy emergency;
- Determine audiences to be contacted;
- Provide approved information to determined audiences as deemed appropriate; and
- Other items as deemed appropriate by the Emergency Communication Team.

Section 4.3.4 Response: Petroleum

Section 4.3.4.1 Response: Identify potential areas of shortages

ESF 12 directs the KCC to identify potential areas of petroleum shortages.

In order to identify areas of potential shortages of transportation fuels, the KCC Staff relies on reports from the National Association of State Energy Offices (NASEO) that are emailed to a list serve, which includes the KCC Energy Division. If NASEO alerts the KCC of an impending shortage, the KCC Energy Division will notify KDEM and also contact the Petroleum Marketers and Convenience Store Association of Kansas (PMCA) for any information they may have of shortages occurring in the retail market areas. PMCA has an active associate member roster of nearly 100 companies whose products and services are vital to the success of petroleum distributorships, convenience stores and retail outlets. A link to the associate members can be found in Appendix J.

KCC staff will reach an agreement with the PMCA for the PMCA to alert the KCC staff if they become aware of any pending fuel shortages. A list of fuel pipelines is provided in Section 4.2.3.2, under the contact section for pipelines. Pipeline contacts for these companies can generally be found in the Kansas Pipeline Alliance Contact List found in Appendix D.

Fuel depots and refineries in the Kansas region are identified on the map in Appendix G. A list of the depots and contact numbers are found in Appendix G. The fuel depots are the locations that are accessible to truck loading of fuel for delivery to other locations.

Section 4.3.4.2 Response: Plan for transportation of products to affected areas

ESF 12 directs the KCC to plan for transportation of petroleum products to affected areas.

A contact list of Trucking companies in Kansas is found in Appendix H.

Other contact information for availability can be found in Section 4.3.4.1.

Section 4.3.5 Response: Serve the Kansas SEOC Team in various areas of Field Operations

ESF 12 directs the KCC to serve the Kansas SEOC Team in the various areas of Field Operations. One area is the Forward State Emergency Response Team. Other Impact Assessment Teams include, but are not limited to, the Rapid Response Team, the PDA Team, JFO Operations, Recovery Center Operations, and Intrastate and/or Interstate Mutual Aid Assistance Programs.

Section 4.3.5.1 Response: Forward State Emergency Response Team

At the request of KDEM to provide employees to support the Forward State Emergency Response Team, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support the Forward State Emergency Response Team, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.3.5.2 Response: Impact Assessment Teams

At the request of KDEM to provide employees to support Impact Assessment Teams, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support the Impact Assessment Teams, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

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Section 4.3.5.3 Response: Rapid Response Team

At the request of KDEM to provide employees to support the Rapid Response Team, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support the Rapid Response Team, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.3.5.4 Response: Preliminary Damage Assessment (PDA) Team

At the request of KDEM to provide employees to support the PDA Teams, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support the PDA Team, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.3.5.5 Response: Joint Field Office (JFO) Operations

At the request of KDEM to provide employees to support JFO Operations, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support JFO Operations, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.3.5.6 Response: Recovery Center Operations

At the request of KDEM to provide employees to support Recovery Center Operations, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support Recovery Center Operations, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.3.5.7 Response: Intrastate and/or Interstate Mutual Aid Assistance

As part of the requirements of Section 4.2 of this Plan, all energy suppliers are required to participate in any Mutual Aid Assistance Program.

Section 4.3.6 Response: Request Needed Resources to Repair Damaged Systems or Infrastructure

ESF 12 directs the KCC to request needed resources to repair damaged electric systems, natural gas systems, and associated public infrastructure.

Section 4.3.6.1 Response: Electric Systems

The large electricity suppliers will have sufficient inventory to respond to most electrical emergencies that require equipment replacements. They also have plans in place to draw personnel for multi-state operations to assist in recovery. However, the small electricity supplier, like those operated by a municipality, typically will not have additional transformers, poles, wire, or equipment available to replace damaged equipment or sufficient personnel to respond to a widespread service outage. To that end, every electricity supplier shall participate in mutual response programs with other Kansas suppliers for mutual aid service, if they cannot rely on company resources.

If the mutual aid program of the supplier is unable to provide sufficient resources for the restoration process, the KCC will contact nearby operators that may be able to provide assistance. The contacts will be made using the Electricity Supplier contact list found in Appendix F.

If an effected utility has identified a shortage of resources after their PDA or at any time during the restoration efforts, these shortages will be identified during the daily updating meetings. Once identified, the KCC will request that KDEM provide resources under their control.

For electric related emergencies, the following resources are considered most likely to be needed:

- Bucket trucks, Digger/Derrick trucks;
- Poles and cross arms;
- Transformers, fuses, and wire;
- Conduit and trenchers;
- Electrical lineman qualified in service restoration; and
- Electricians qualified in construction of service entrances for the customer.

Section 4.3.6.2 Response: Natural Gas Systems

The large natural gas suppliers will have sufficient inventory to respond to most natural gas emergencies that require equipment replacements. They also have plans in place to draw personnel for multi-state operations to assist in recovery. However, the small gas supplier, like those operated by a municipality, typically will not have additional pipe or equipment available to replace damaged equipment or sufficient personnel to respond to a widespread service outage. To that end, every gas supplier shall participate in mutual response programs with other Kansas suppliers for mutual aid service, if they cannot rely on company resources.

If the mutual aid program of the supplier is unable to provide sufficient resources for the restoration process, the KCC will contact nearby operators that may be able to provide assistance. The contacts will be made using the Operators Intrastate-Kansas contact list found in Appendix B and C.

If an effected utility has identified a shortage of resources after their Preliminary Damage Assessment (PDA) or at any time during the restoration efforts, these shortages will be identified during the daily updating meetings. Once identified, the KCC will request that KDEM provide resources under their control.

If an operator is unsure of what resources are needed, the following lists are provided as a means of helping the operator establish these needs.

For gas related emergencies, the following resources are considered most likely to be needed:

- Bottle trucks or cascade systems for limited gas supply;
- Personnel to shut off customer meters and document results prior to reintroducing gas into a pipeline system;
- Personnel qualified in service restoration (relights);
- 1000 feet of 2" diameter polyethylene pipe to be used to restore temporary service;
- Temporary signs to provide markers of gas lines in a debris field after a storm; and
- Pressure regulators that can be used to supply service for the system. This will require knowledge of the maximum expected demand in mcf/d and the established working pressure of the system.

Section 4.3.6.3 Response: Related Public Infrastructure

During the daily update meeting, the KCC Staff will ask each utility about what support they need regarding access to its utilities infrastructure. There are other ESF categories that are directly responsible for public infrastructure, such as bridges and roads, including ingress and

egress issues. During some situations, this data won't be known until after the PDA and, in some cases, the PDA might not happen due to a lack of ingress issues.

If public infrastructure is identified as damaged during the PDA process or at any time during the restoration efforts, these damages will be identified during the daily updating meetings. Once identified, the KCC will request that KDEM provide resources under their control.

Section 4.3.7 Response: Facilitate Communication

Section 4.3.7.1 Response: Energy Emergencies and Energy Service Restoration

Section 4.3.7.1.1 Response: Public Utilities and Local Agencies and Organizations

Section 4.3.3.1 of this Plan requires public utilities to develop a Public Awareness Plan to educate their customers on abnormal operating conditions related to energy that can be experienced during an emergency such as leaking gas or energized electric wires on the ground. Energy emergencies that develop into life threatening situations require close and immediate cooperation between the energy supplier and the emergency responders. For this reason, the regulations found in Section 2.4 will require energy suppliers to establish and maintain a liaison with the Kansas Department of Emergency Management and the Local Emergency Planning Committees that are active in the energy supplier's areas of operation. The liaison shall provide the following:

- Learn the responsibility and resources of each government organization that may respond to a utility emergency;
- Acquaint the official with the energy supplier's ability in responding to emergencies;
- Identify the types of utility emergencies of which the operator notifies the officials; and
- Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

Section 4.3.7.1.2 Response: Public Utilities and State Agencies and Organizations

Incidents must be managed at the lowest possible jurisdictional level and supported by additional capabilities when needed. During an incident involving shortages of electricity and natural gas, the KCC monitors the response of the energy suppliers and takes an active role in response after the activation of ESF 12. When ESF 12 is activated, representatives of KCC Staff and the major utilities may be requested to be present in the State Emergency Operations Center (SEOC) to work as a team to help return the State to normal conditions in a safe and efficient manner. The KCC's responsibilities for this phase are related to providing information to KDEM that was developed in the preparedness phase as well as monitoring and providing input to the ongoing activities of the response. In addition to public utilities, non-government organizations (NGO) may be requested to assist the KCC and KDEM in determining appropriate State response. NGOs included in the contact lists as part of this Plan are:

- Kansas Municipal Utilities (KMU);
- Kansas Municipal Energy Association (KMEA);
- Petroleum Marketers and Convenience Store Association (PMCA);
- Propane Marketers Association of Kansas (PMAK); and
- Kansas Motor Carriers Association (KMCA).

Section 4.3.7.1.3 Response: Public Utilities and Federal Agencies and Organizations

Interstate and intrastate energy transmission systems are regional in nature and any action on the regional system can affect the entire region. Because of the interdependency of energy transmission, there is a possibility that emergency response to a Kansas emergency will require extensive coordination with energy suppliers located in other parts of the nation. In order to facilitate this coordination, the KCC Staff will develop contact lists with organizations that have national

oversight over energy topics. These organizations include PHMSA, FERC, DOE, NASEO, SPP, NERC, NRC, and FEMA. Contacts for these organizations can be found in Appendix L.

Section 4.3.8 Response: Monitor Electric Emergencies Affecting the Public

ESF 12 directs the KCC to monitor electric utilities and other support agencies and organizations responding to and recovering from emergencies regarding electric generating capacity, shortages, electric generating fuel shortages, transmission and distribution line outages, and electrical service outages affecting the public.

Section 4.3.8.1 Response: Monitor Electric Utilities and Other Support Agencies and Organizations Responding To and Recovering From:

Section 4.3.8.1.1 Response: Emergencies Regarding Electric Generating Capacity

Generating utilities will report at least daily to the KCC and KDEM per Section 4.3.1, the following:

- For emergencies regarding the loss of generating units, the utility owning the generating unit shall advise which generating units that are running or available;
- Which generating units are down or unavailable;
- Why the unit is down;
- What the utility is doing to fix the problem;
- How long will it be until the unit is available;
- If there is a need to call for conservation of electricity; and
- Any assistance that the KCC and/or KDEM can provide to help alleviate the problem.

Section 4.3.8.1.2 Response: Shortages

The utility will report at least daily, the following:

- Why there is a shortage;
- Estimated time to restore lost transmission or generation;
- What the utility is doing to correct the shortage;
- If there is a need to call for conservation of electricity;
- If blackouts are anticipated; and
- If so, where and for how long.

Section 4.3.8.1.3 Response: Electric Generating Fuel Shortages

The utility will report at least daily to the KCC and KDEM, the following:

- What fuel is in short supply;
- What generation units are affected;
- How this shortage is going to affect the utility's system during the timeframe of the shortage event;
- Why the fuel is in short supply; and
- What the utility is doing to alleviate the problem.

Section 4.3.8.1.4 Response: Transmission and Distribution Line Outages

The utility will report at least daily the following:

- What transmission lines are out of service;
- What distribution areas that are out of service;

- How many customers are involved;
- How are special needs and high priority customers are being taken care of;
- If the utility is following its priority of service requirements;
- When customers can expect to have service restored; and
- Anything that the KCC and KDEM can do to assist.

Section 4.3.8.1.5 Response: Electrical Service Outages

The utility will report at least daily the following:

- What distribution lines are out of service;
- What distribution areas that are out of service;
- How many customers are involved;
- How special needs and high priority customers are being taken care of;
- If the utility is following its priority of service requirements;
- When customers can expect to have service restored; and
- Anything that the KCC and KDEM can do to assist.

Section 4.4 Recovery

ESF 12 directs the KCC on seven issues related to recovery:

- Coordinate with technical experts on energy supply, production and delivery, and coordinate the exchange of energy information;
- Review recovery actions, develop strategies for meeting local, state, and private sector energy needs;
- Continue to monitor local, state, and utility actions;
- Request, when appropriate, needed resources to repair damaged energy systems and/or associated public infrastructure;
- Work with the SCO and other state and local emergency organizations to establish priorities to repair damaged energy systems, if necessary;
- Upon request, accompany damage assessment teams for PDAs; and
- Draft recommendations and other reports as appropriate.

Section 4.4.1 All Energy Suppliers – Common

Section 4.4.1.1 Recovery: Coordinate with Technical Experts

ESF 12 directs the KCC to coordinate with technical experts on energy supply, production and delivery, and coordinate the exchange of energy information. The contacts will be the same as listed under the response phase. See the Table of Contents for a listing of each Appendix.

Section 4.4.1.2 Recovery: Recovery Actions Review and Strategy Development

ESF 12 directs the KCC to review recovery actions and develop strategies for meeting local, state, and private sector energy needs.

Recovery actions are developed by each affected energy supplier. The KCC closely monitors and watches the recovery efforts of each affected energy supplier. After an event, in coordination with KDEM, the Commission Staff will hold a post event debriefing meeting. The purpose of this meeting is to review the event and the energy supplier(s') response to said event. This is a time to reflect on weaknesses and identify strengths. When the Commission Staff identifies areas of weakness, it will follow up via discussions with the effected utility to address the possibility of developing an Improvement Plan.

Strategies for meeting local, state, and private sector energy needs will be reviewed during the post event debriefing meeting.

Section 4.4.1.3 Recovery: Continue to Monitor Local, State, and Utility Actions

ESF 12 directs the KCC to continue to monitor local, state, and utility actions.

See specifics for each source of energy in the sections that follow.

Section 4.4.1.4 Recovery: Request Needed Resources to Repair Damaged Energy Systems and Associated Public Infrastructure

ESF 12 directs the KCC to request needed resources to repair damaged energy systems and/or associated public infrastructure.

Section 4.4.1.4.1 Recovery: Energy Systems

If an effected utility has identified a shortage of resources after its PDA or at any time during the restoration efforts, these shortages will be identified during the daily updating meetings. Once identified, the KCC will request that KDEM provide resources under their control.

Section 4.4.1.4.2 Recovery: Associated Public Infrastructure

During the daily update meeting, the KCC Staff will ask each utility about what support they need regarding access to its utilities infrastructure. There are other ESF categories that are directly responsible for public infrastructure, such as bridges and roads, including ingress and egress issues. During some situations, this data won't be known until after the PDA and, in some cases, the PDA might not happen due to a lack of ingress issues.

If public infrastructure is identified as damaged during the PDA process or at any time during the restoration efforts, these damages will be identified during the daily updating meetings. Once identified, the KCC will request that KDEM provide resources under their control.

Section 4.4.1.5 Recovery: Work with the SCO and Other State and Local Emergency Organizations to Establish Priorities to Repair Damaged Energy Systems, if Necessary

ESF 12 directs the KCC to work with the SCO and other state and local emergency organizations. See the energy source specific sections below for more information regarding how each industry performs this task.

Section 4.4.1.6 Recovery: Upon Request, Accompany Damage Assessment Teams for PDAs (Preliminary Damage Assessments)

At the request of KDEM to provide employees to accompany the Damage Assessment Teams for PDAs, the administrator of this Plan (Utilities Division Director) will immediately notify the Executive Director of the KCC that such a request has been made. The notification will include the number of employees requested, when and where they are to report to support the Damage Assessment Teams for PDAs, and the estimated duration of service time. The Executive Director shall be responsible for responding to this request and will make contact with KDEM to approve or modify the request.

Section 4.4.1.7 Recovery: Draft Recommendations and Other Reports as Appropriate

ESF 12 directs the KCC to draft recommendations and other reports as appropriate.

An output from the post-event debriefing meeting is the opportunity to draft recommendations to the effected utility for improvement. The KCC staff will be responsible for drafting recommendations that may be requested during any specific event. The Utilities Division Director and the Executive Director will make decisions about how the Staff will respond to requests for written reports. When appropriate, the KCC staff will draft a Report and Recommendation (R&R) to the Commission if an R&R could result in making a change that is in the public interest.

Section 4.4.2 Recovery: Electrical

Section 4.4.2.1 Recovery: Coordinate with Technical Experts on Energy Supply, Production, and Delivery, and Coordinate the Exchange of Energy Information

The KCC receives FERC Form 1 information annually by May 1. This information is electronically archived on the KCC Server and is available to KCC Staff at the following address: \\Topeka3\Utilities\UtilitiesPublic\AnnualReports. If parties outside of the KCC wish to access these electronic documents, please contact the KCC Utilities Division Director. Electrical generation information is found in each utility companies FERC FORM 1 starting at page 402.

Electrical Production information is found in the FERC Form 1 starting at page 401a and continuing through 401b.

During the daily scheduled reports, KCC Staff will acquire information on the ongoing recovery process and the estimated time for completion. Should the situation require it, Staff will use the acquired information to facilitate high level communications with federal agencies such as FERC, PHMSA, and NASEO regarding state or federal intervention to assist the recovery effort.

Section 4.4.2.2 Recovery: Review Recovery Actions, Develop Strategies for Meeting Local, State, and Private Sector Energy Needs

The Energy Operations staff is responsible for the Capacity Report, a report covering the status of electricity generation in Kansas. This report is presented bi-annually to the legislature and it is updated annually to provide data to the Commission concerning the amount of generation that is available to meet the needs of the State.

Based on the review of the electric supplier's progress in the recovery effort, Staff will work with the supplier, KDEM and the local county emergency responders to assist the supplier in maintaining the desired progress to recovery.

Section 4.4.2.3 Recovery: Continue to Monitor Local, State, and Utility Actions

Actions will be monitored by KCC Staff onsite or through regularly scheduled calls. Staff may also initiate contact with the electric supplier should the need arise.

Section 4.4.2.4 Recovery: Request, When Appropriate, Needed Resources to Repair Damaged Energy Systems and/or Associated Public Infrastructure

Using the contact lists included as appendices of this Plan, KCC Staff will request needed resources from other electric suppliers and from mutual aid organizations.

Section 4.4.2.5 Recovery: Work with the SCO and Other State and Local Emergency Organizations to Establish Priorities to Repair Damaged Energy Systems, if Necessary

Recovery from an emergency will generally be performed by the electric supplier and each supplier is required to have a Restoration Prioritization Plan as part of its overall Emergency Plan. For those situations, however, that are not included in the supplier's Plan or if events alter the priority schedule, KCC Staff will work with all affected parties to provide input in the development of restoration priorities as required.

Section 4.4.3 Recovery: Natural Gas

Section 4.4.3.1 Recovery: Coordinate with Technical Experts on Energy Supply, Production and Delivery, and Coordinate the Exchange of Energy Information

The KCC receives FERC Form 2 information annually by May 1. This information is electronically archived on the KCC Server and is available to KCC Staff at the following address: \\Topeka3\Utilities\UtilitiesPublic\AnnualReports. If parties outside of the KCC wish to access these electronic documents, please contact the KCC Utilities Division Director. Gas plant sta-

tistics are found in each utility companies FERC FORM 2 starting at page 500. Gas storage amounts are found in each utility companies FERC FORM 2 starting at page 220.

During the daily scheduled reports, KCC Staff will acquire information on the ongoing recovery process and the estimated time for completion. Should the situation require it, Staff will use the acquired information to facilitate high level communications with federal agencies such as FERC, PHMSA, and NASEO regarding state or federal intervention to assist the recovery effort.

Section 4.4.3.2 Recovery: Review Recovery Actions, Develop Strategies for Meeting Local, State, and Private Sector Energy Needs

Based on the review of the gas supplier's progress in the recovery effort, Staff will work with the supplier, KDEM and the local county emergency responders to assist the supplier in maintaining the desired progress to recovery.

Section 4.4.3.3 Recovery: Continue to Monitor Local, State, and Utility Actions

Actions will be monitored by KCC Staff onsite or through regularly scheduled calls. Staff may also initiate contact with the gas supplier should the need arise.

Section 4.4.3.4 Recovery: Request, When Appropriate, Needed Resources to Repair Damaged Energy Systems and/or Associated Public Infrastructure

Using the contact lists included as appendices of this Plan, KCC Staff will request needed resources from other gas suppliers or from mutual aid organizations.

Section 4.4.3.5 Recovery: Work with the SCO and Other State and Local Emergency Organizations to Establish Priorities to Repair Damaged Energy Systems, if Necessary
Recovery from an emergency will generally be performed by the gas supplier, and each supplier is required to have a Restoration Prioritization Plan as part of its overall Emergency Plan. For those situations, however, that are not included in the supplier's Plan or if events alter the priority schedule, KCC Staff will work with all affected parties to provide input in the development of restoration priorities, as required.

Section 4.4.4 Transportation Fuels and Propane

Section 4.4.4.1 Recovery: Coordinate with Technical Experts on Energy Supply, Production and Delivery, and Coordinate the Exchange of Energy Information

During the daily scheduled reports, KCC Staff will acquire information on the ongoing recovery process and the estimated time for completion. Should the situation require it, Staff will use the acquired information to facilitate high level communications with federal agencies such as DOT and NASEO regarding state or federal intervention to assist the recovery effort and waive regulatory constraints associated with fuel deliveries.

Section 4.4.4.2 Recovery: Review Recovery Actions, Develop Strategies for Meeting Local, State, and Private Sector Energy Needs

Based on the review of the fuel supplier's progress in the recovery effort, Staff will work with the supplier, KDEM and the local county emergency responders to assist the supplier in maintaining the desired progress to recovery.

Section 4.4.4.3 Recovery: Continue to Monitor Local, State, and Utility Actions

For transportation fuels and propane deliveries, actions and needs will be monitored by KDEM, and KCC Staff will provide input at KDEM's request. Staff may also initiate contact with the fuel or propane supplier should the need arise.

Section 4.4.4.4 Recovery: Request, When Appropriate, Needed Resources to Repair Damaged Energy Systems and/or Associated Public Infrastructure

Using the contact lists included as appendices of this Plan, KCC Staff will request needed resources from other fuel suppliers and from mutual aid organizations.

Section 4.4.4.5 Recovery: Work with the SCO and Other State and Local Emergency Organizations to Establish Priorities to Repair Damaged Energy Systems, if Necessary

Recovery from an emergency in the context of fuel transportation will generally be performed by the fuel provider and depends on the availability of truck transportation and highway access. At KDEM's direction, KCC Staff will work with all affected parties to provide input in the development of restoration priorities, as required.

Section 5.0 Training Requirements

All personnel designated to serve as SEOC representatives shall be given an initial indoctrination class of familiarization training that shall include a review of the EOM and a physical tour of the SEOC. The initial indoctrination class shall also include a general review of the Kansas Response Plan and a review in detail of ESF12.

- No Staff member shall be assigned to this duty without completing Department of Homeland Security classes (ICS-100 and ICS-200). In an event, no Staff members shall be assigned to this duty until they have had the prescribed initial training unless approved by the Chief of Energy Operations or Chief of Pipeline Safety.
- Comprehensive Resource Management and Credentialing System for emergency responders.
- Familiarization and use of Continuity of Operations Plan and associated software.
- Training on use of data resources. Specifically, the mapping tools for utility infrastructure.