

Company Emergency Response Plans Standard

SUMMARY

This standard describes the requirements for the development of the *Company Emergency Response Plan (CERP)* and its associated functional and hazard specific annexes.

TARGET AUDIENCE

This standard applies to emergency preparedness staff from all lines of business (LOBs), including:

- Emergency Operations Center (EOC) staff
- LOB Employees and Contractors with an emergency role
- Regional Emergency Center (REC) staff
- Gas Control Center and Emergency Center (GEC) staff
- Electric Transmission Emergency Center (ETEC) staff
- Substation Transmission Operations Emergency Center (STOEC) staff
- Distribution Control Center (DCC) staff
- Operations Emergency Center (OEC) staff
- District Storm Room (DSR) staff
- All Coordination Center staff

Company Emergency Response Plans Standard

TABLE OF CONTENTS

SUBSECTION	TITLE	PAGE
1	Purpose	3
2	Risk Identification	5
3	Authority to Approve Emergency Plans and Annexes.....	5
4	CERP Updates.....	6
5	CERP Location and Version Control.....	7
6	CERP Update Announcement.....	7
7	CERP Regulatory Requirements	7
8	Roles and Responsibilities	8
9	Implementation.....	9
	Appendix A, CERP Base Plan and Annex Roles	14

Company Emergency Response Plans Standard

Requirements

1 Purpose

- 1.1 The purpose of the [Company Emergency Response Plan \(CERP\), EMER-3001M](#), is to assist Pacific Gas and Electric Company (PG&E) personnel with a safe, efficient, and coordinated response to an emergency event affecting Gas or Electric systems.
- 1.2 For the purpose of this document, emergency events include, but are not limited to cyber-attacks, pandemic response, and emergency incidents affecting power generation and gas and electric transmission, storage, and distribution.
- 1.3 The CERP defines the framework and overarching concept of operations for PG&E's Emergency Operations Center (EOC) organization and the common activities carried out in response to all emergency situations.
- 1.4 The CERP presents an emergency response structure with defined emergency roles and responsibilities in support of the Gas, Electric and other PG&E lines of business (LOBs) and externally among agencies and organizations including:
 - Government (federal, state, and local)
 - Media
 - Other gas and electric utilities
 - Essential community services
 - Vendors
 - Public agencies
 - First responders
 - Contractors
- 1.5 Annexes address activities specific to a hazard or function. As a rule, core activities identified in the CERP are not repeated in the annexes.
- 1.6 The CERP consists of the base plan and its supporting annexes. The CERP outlines the Company's response to All Hazards.
 1. The CERP addresses how PG&E responds to emergency events and includes the following information:
 - The company overview
 - The company emergency management structure and emergency roles
 - Risk and hazard planning assumptions
 - Response concepts

Company Emergency Response Plans Standard

- Incident management systems
 - PG&E emergency preparedness and response organizations and responsibilities
 - Emergency operations facilities
 - Coordination centers
 - Concepts of operation
 - Resource management
 - Mutual assistance
 - Emergency financial considerations
 - Information on emergency training and exercises
2. Supporting annexes to the CERP include both functional and hazard-specific annexes.
- a. Functional annexes contain unique emergency response information for a particular “function” or Line of Business (LOB). For example, the “function” of employee communications is included in the “Emergency Communications Annex”. These Annexes are updated and reviewed annually by the “owning” LOB. Emergency Preparedness and Response Strategy and Execution (EP&R SE) will format and publish the documents once the LOB has communicated that they have completed their annual review and /or updates.
- (1) Functional annexes in the CERP include:
- Aviation Services
 - Disaster Rebuild
 - Electric
 - Emergency Communications
 - Gas
 - Human Resources
 - Information Technology
 - Logistics
 - Power Generation
 - Workforce Management/Contact Center Operations

Company Emergency Response Plans Standard

- b. Hazard-specific annexes contain information on unique challenges and actions for specific hazards. Each hazard-specific annex is developed for a particular hazard scenario. EP&R SE will review and update the Hazard annexes annually with the identified stakeholders for each specific annex.

(1) Hazard annexes currently developed include the following:

- Cybersecurity
- Earthquake
- Extreme Weather
- Infectious Disease and Pandemic (under development as of this publication date)
- Public Safety Power Shutoff
- Wildfire
- Tsunami

- 1.7 As PG&E continues to evaluate risks, additional All Hazard procedures or Hazard annexes may be developed to address those risks. It is the responsibility of the Emergency Planning unit of EP&R SE to manage the CERP and annexes.

2 Risk Identification

- 2.1 PG&E maintains a risk registry that identifies threats and hazards that are listed and prioritized by likelihood of occurrence and severity. The Risk Registry is one point of information in prioritization of the development of new annexes.
- 2.2 Other sources of information that may inform of the need to develop a new annex can come from recent activations or incidents, newly identified hazards not listed in the Risk Registry, or scenarios and risks identified by other lines of business.
- 2.3 Future Annex development ideas should be submitted to the Emergency Management Continuous Improvement channel for further consideration and vetting by the Emergency Preparedness and Response Strategy and Execution Leadership Team.

3 Authority to Approve Emergency Plans and Annexes

- 3.1 The Director of Emergency Preparedness and Response is responsible for approving the CERP and the hazard-specific annexes.
- 3.2 Each functional annex is approved by the Vice President presiding over that LOB or function.

Company Emergency Response Plans Standard

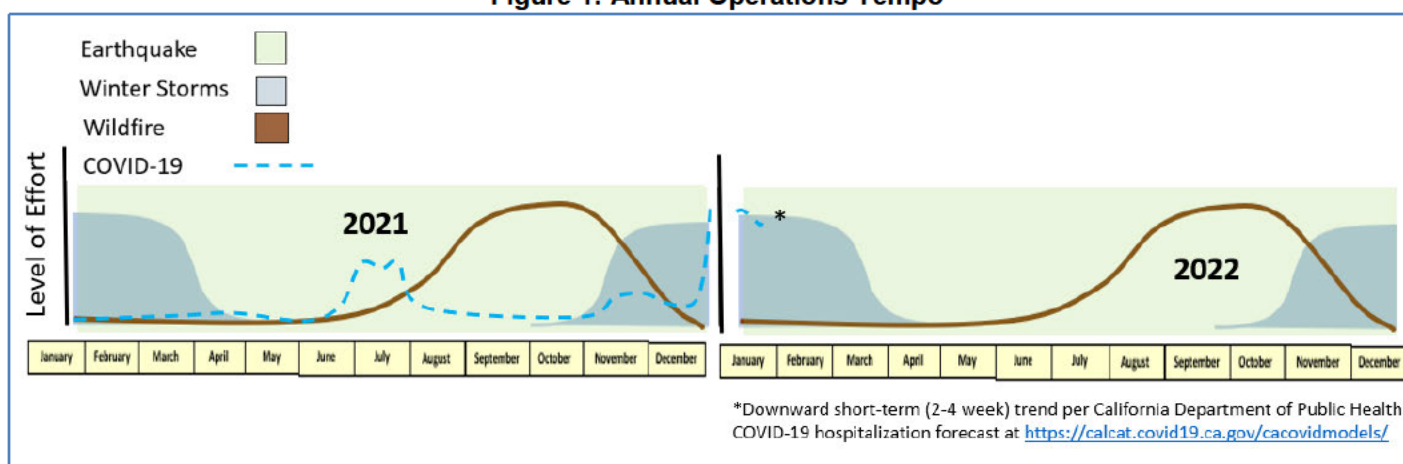
4 CERP Updates

- 4.1 Review the CERP annually and update as appropriate. Following the formal approval of all required changes, the CERP is published annually on December 31.

Base Plan	Due Date
EMER-3001M, Company Emergency Response Plan	December 31

- 4.2 PG&E's service area is subject to several prominent threats that increase the likelihood of an Emergency Operations Center (EOC) activation at discrete times on an annual basis. Notably among those threats are late summer/fall wildfires and winter and early spring rains and flooding potential (Figure 1).

Figure 1: Annual Operations Tempo



- 4.3 CERP hazard and functional annex owners must review annexes annually for needed changes and submit updated annexes to EP&R Strategy and Execution department (EPRCERP@pge.com) in accordance with Table 1.

Table 1: Annex Maintenance and Deadlines

Annexes	Review Due	New Annex Publish Date
Hazard		
1. Cybersecurity (NERC CIP-008 compliance), EMER-3102M	Q1	
2. Earthquake, EMER-3101M	Q4 (NLT 11/30)	
3. Extreme Weather Annex (EMER-3108M)	Q3	
4. Infectious Disease and Pandemic Response Annex, EMER-3103M		6/30/22
5. Public Safety Power Shutoff Annex, EMER-3106M	April 30	
6. Tsunami Annex, EMER-3104M	Q3	
7. Wildfire Annex, EMER-3105M	Q1	
8. Physical Threat Annex		TBD
Functional		
1. Aviation Services Annex, EMER-3010M	Q3	
2. Canal Entry Annex, EMER-3011M	Q4 (NLT 11/30)	
3. Nuclear Annex		6/30/22
4. Disaster Rebuild, EMER-3012M	Q1	
5. Electric, EMER-3002M	Q2	

Company Emergency Response Plans Standard

Annexes	Review Due	New Annex Publish Date
6. Emergency Communications, EMER-3008M	Q2	
7. Gas, EMER-3003M	Q4 (NLT 11/30)	
8. Human Resources, EMER-3006M	Q4 (NLT 11/30)	
9. Information Technology, EMER-3007M	Q2	
10. Logistics, EMER-3005M	Q3	
11. Power Generation, EMER-3004M	Q4 (NLT 11/30)	
12. Workforce Management/Contact Center Operations, EMER-3009M	Q4 (NLT 11/30)	

4.4 An interim update to either the CERP or any Annex can be performed by submitting a Change Request form ([EMER-2001S-F01](#)) and emailing EPRCERP@pge.com or by submitting a request through the TEAMS [online change request here](#). Proposed changes are significant when they affect the emergency organizational structure, critical operations, key facilities, or execution of the plan; the information will be published by a Bulletin to the CERP or Annex. Minor changes will be saved and addressed during the next document update.

4.5 Bulletins to the CERP or Annex will be posted electronically in the same location as the CERP and annexes on the Guidance Document Library (GDL). EP&R SE is responsible to publish bulletins.

4.6 The CERP and associated annexes must be approved using PG&E's Enterprise Documentation Routing System (EDRS).

5 CERP Location and Version Control

5.1 The CERP base plan and all annexes will be posted to the GDL. Posting of documents in the GDL is governed by [GOV-2001S](#).

5.2 The CERP documents must be approved with clearly indicated revision numbers. By convention, new revisions automatically supersede all prior revisions. It is not necessary to state in the document (CERP or its annexes) that the current revision supersedes all former versions.

6 CERP Update Announcement

6.1 After the CERP, Annex, or related document has undergone review, approvals, and has been posted to the GDL, EP&R will announce the publication of the updated plan by email.

7 CERP Regulatory Requirements

7.1 Gas and Electric Emergency Management Organizations (EMOs) must ensure they are sufficiently prepared to respond to an emergency event involving gas or electric. Gas and Electric annexes to the CERP must meet all the requirements mandated by government regulatory entities if those requirements are not otherwise met in the CERP. The CERP, therefore, can be submitted with the appropriate annex to complete the requirements of emergency plans by the appropriate regulatory authority.

Company Emergency Response Plans Standard

- 7.2 Gas and Electric regulations for emergency plans are based on the following two regulations:
1. For the Gas Annex to the CERP, Code of Federal Regulation Title 49, Part 192, Subpart L, §192.615, "Emergency plans" and California Public Utilities Commission (CPUC) General Order (G.O.) 112- F, "Rules Governing Design, Construction, Testing, Maintenance, and Operation of Utility Gas Gathering, Transmission, and Distribution Piping Systems," require gas EMO personnel to maintain and update a gas emergency response plan in order to minimize the hazard resulting from a gas pipeline emergency.
 2. For the CERP and the Electric Annex, CPUC G.O. 166, "Standards for Operation, Reliability, and Safety During Emergencies and Disasters," requires electric emergency personnel to prepare a plan that sets forth anticipated response to emergencies and major outages.
- 7.3 It is the responsibility of the Gas and Electric Emergency Preparedness teams to ensure their annexes comply with the appropriate regulations for Gas and Electric respectively. Once they are updated, they can submit to EP&R SE to format and publish in the GDL.

8 Roles and Responsibilities

- 8.1 EP&R is responsible for the CERP and will perform the following related actions annually:
1. Review, update, and publish the next version of the CERP in the Related Documents section on the GDL.
 2. Convene a Subject Matter Expert (SME) CERP Review Team, whose membership includes representatives from each LOB that have a functional annex in the CERP, and a representative from the EP&R SE Prevention Team. Members of this team are subject matter experts from other LOBs who ensure consistency between the CERP and their functional annex or emergency response plan.
 3. Review the Plan to determine if changes or revisions are needed.
 4. Revise the CERP and submit the draft for review to the Company Emergency Management Core Team with input from the expanded CERP planning team and associated stakeholders.
 5. Revise the CERP as necessary and submit it for final approval to the Director of EP&R.
 6. Post the CERP electronically on the GDL after Director approval.
- 8.2 LOBs will:
1. Make modifications to their respective functional annex.
 2. Cite relevant LOB policy, standard, procedure, or regulation bases for change.
 3. Ensure LOB annex content is consistent with the CERP concept of operations.
 4. Describe unique LOB annex emergency operations, organizations, and facilities.

Company Emergency Response Plans Standard

- 8.3 LOB functional annex plan writers are responsible for the following:
1. Routing the annex for approval through the LOB. All plan annexes need to be approved by the relevant Vice President presiding over the LOB or function
 2. Submitting the approved Annex to EP&R SE for publication in the GDL
- 8.4 EP&R Strategy and Execution will complete the hazard-specific annexes with guidance from hazard knowledgeable SMEs, the company risk register, and other internal and external stakeholders, as appropriate.
- 9 Implementation**
- 9.1 Document Owners will coordinate the release of new annexes or revisions with the Manager of Emergency Planning, Process Improvement and Change.

END of Requirements

Company Emergency Response Plans Standard

DEFINITIONS

All-Hazards: An approach for prevention, protection, preparedness, response, and recovery that addresses a full range of threats and hazards, including domestic terrorist attacks, natural and manmade disasters, accidental disruptions, and other emergencies.

Annex, Functional: Functional annexes that address the performance of a particular broad task or function, such as mass care or communications.

Annex, Hazard: Hazard-specific annexes that provide additional information specific to a particular hazard.

Base Plan: The base plan gives an overview of PG&E's emergency response organization and policies and provides a general understanding of the company's approach to emergency response for all involved LOBs and departments.

CERP: Company Emergency Response Plan that contains a base plan and both functional and hazard-specific annexes.

Pacific Gas and Electric Public Safety Specialists: Those men and women who are trained in field response for making safe, stabilizing the emergency, and restoration of the power systems.

Plan Preparer: Personnel who are responsible for documenting and updating emergency response plans and/or business continuity plans for their lines of business. These staff may or may not be in an emergency preparedness department.

IMPLEMENTATION RESPONSIBILITIES

The Director, Emergency Preparedness and Response – Strategy and Execution, is responsible for implementation of this standard.

GOVERNING DOCUMENT

[EMER-01 Emergency Response and Business Continuity Policy](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

[California Public Utilities Commission General Order 166](#)

Records and Information Management:

PG&E records are company assets that must be managed with integrity to ensure authenticity and reliability. Each Line of Business (LOB) must manage Records and Information in accordance with the Enterprise Records and Information (ERIM) Policy, Standards and Enterprise Records Retention Schedule (ERRS). Each LOB is also responsible for ensuring records are complete, accurate, verifiable, and can be retrieved upon request. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further records management guidance or contact ERIM at Enterprise_RIM@pge.com.

Company Emergency Response Plans Standard

REFERENCE DOCUMENTS

Developmental References:

NA

Supplemental References:[EMER-2001S-F01, Change Request Form](#)[EMER-3001M, Company Emergency Response Plan](#)[EMER-3002M, Electric Annex](#)[EMER-3003M, Gas Annex](#)[EMER-3004M, Power Generation Annex](#)[EMER-3005M, Logistics Annex](#)[EMER-3006M, Human Resources Annex](#)[EMER-3007M, Information Technology Annex](#)[EMER-3008M, Emergency Communications Annex](#)[EMER-3009M, Workforce Management/Contact Center Operations Annex](#)[EMER-3010M, Aviation Services Annex](#)[EMER-3011M, Canal Entry Annex](#)[EMER-3012M, Disaster Rebuild Annex](#)[EMER-3101M, Earthquake Annex](#)[EMER-3102M, Cybersecurity Annex](#)[EMER-3104M, Tsunami Annex](#)[EMER-3105M, Wildfire Annex](#)[EMER-3106M, Public Safety Power Shutoff Annex](#)[EMER-3107M, Capacity Shortfall Annex](#)[EMER-3108, Extreme Weather Annex](#)[GOV-2001S, Guidance Document Management Standard](#)

APPENDICES

Appendix A, CERP Base Plan and Annex Roles

ATTACHMENTS

NA

DOCUMENT REVISION

NA

Company Emergency Response Plans Standard

DOCUMENT APPROVER

[REDACTED] Manager, EP&R SE Emergency Planning Process Improvement, and Change (EPPIC)

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DOCUMENT OWNER

[REDACTED] Technical Writer, Expert, EPPIC

DOCUMENT CONTACT

[REDACTED] Emergency Management Specialist, Expert, EPPIC

[REDACTED] n, Emergency Management Specialist, Expert, EPPIC

[REDACTED] Emergency Management Specialist, Expert, EPPIC

[REDACTED] Technical Writer, Expert, EPPIC

Company Emergency Response Plans Standard

REVISION NOTES

Where?	What Changed?
1.3	Updated text to include concept of operations
1.6, 2. a.	Expanded explanation of functional annexes
1.6.2. b.	Expanded explanation of hazard-specific annexes
1.6.2. b. (1)	Removed "Fire Prevention" from list; Added Tsunami
2	Renamed Risk Identification New paragraphs; previous content removed
3.1	Updated responsibility
4.1	Changed CERP Due Date
Figure 1	Updated COVID Cycle
(Previous) 4.3	Deleted section on development triggers
Table 1	Updated Review Dates
4.4	Updated to include online change request
8.1.2	Updated with reference to EP&R SE Prevention
Document Contact	Added [REDACTED]
Appendix A,	Deleted Prevention Lead and Training Lead

Company Emergency Response Plans Standard

Appendix A, CERP Base Plan and Annex Roles

Page 1 of 1

EP&R Lead CERP Planner	Hazard / Functional Annex Preparers	EP&R Lead Technical Writer
<p>Convenes a CERP core planning team</p> <p>Establishes the expanded CERP Planning team as appropriate</p> <p>Develops and distributes yearly CERP planning timeline to stakeholders</p> <p>Briefs core team on findings</p> <p>Makes revision to CERP Base Plan and submits to Director of EP&R for approval</p> <p>Provides SME assistance to LOB plan preparers</p>	<p>Convenes an SME planning team</p> <p>Reviews existing Hazard or Functional annex for needed revisions</p> <p>Revises annex as appropriate</p> <p>Submits draft annex to EP&R in accordance with published planning timeline</p> <p>Routes document for approval by LOB VP</p> <p>Submits final copies of LOB annex/plan to EP&R department and distribute hard copies as required by LOB</p>	<p>Revises CERP base plan and LOB annex templates</p> <p>Provides technical assistance to LOB and EP&R plan preparers</p> <p>Distributes CERP planning documents to LOBs in coordination with EP&R CERP and/or Annex plan preparer</p> <p>Tracks changes to CERP and Hazard Annexes</p> <p>Ensures that follow-up from stakeholder meetings is tracked and completed in accordance with timelines established.</p> <p>Posts final versions of all plans on Guidance Document Library SharePoint site and distributes hard copies</p>