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December 21, 2023

Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Re: *Reliability and Resource Adequacy Study Review* – 2023–2024 Winter Readiness Planning Report – Request for Additional Information – Hydro's Reply

Newfoundland and Labrador Hydro ("Hydro") received correspondence from the Board of Commissioners of Public Utilities ("Board") on December 15, 2023 directing Hydro to file additional information in relation to planning for, and reliability of, the Island Interconnected System for the 2023–2024 winter.[1] The Board's requests, as well as Hydro's responses, follow. In addition to the update on the Holyrood Thermal Generating Station ("Holyrood TGS") Unit 1, Hydro is providing additional updates related to other generating sources to the Board in the sections that follow. Hydro notes that current forecasts indicate sufficient reserves and Hydro will continue to update the Board, as necessary.

1) An up-to-date schedule for the return to service of Unit 1 at Holyrood.

Holyrood TGS Unit 1 has been repaired and returned to service on December 20, 2023.

Other generating source updates

Since receiving the Board's correspondence, Hydro staff have identified a small boiler tube leak on Holyrood TGS Unit 3. This has resulted in a cautionary derating of the unit to 70 MW, beginning December 16, 2023.

Holyrood TGS Unit 3 is being monitored and is scheduled to come offline in early January 2024 to repair the leak. Repairs are estimated to take approximately two weeks. At this time, the leak remains stable and Hydro is monitoring the unit closely. Should the status of the Holyrood TGS Unit 3 change prior to the planned repair, it will be removed from service and Hydro will notify the Board.

Subsequent to the receipt of the Board's correspondence, the Labrador-Island Link ("LIL") experienced an issue with Cable 3 in the Strait of Belle Isle. The issue is currently under investigation during which the LIL has been placed under operating restriction to 450 MW for normal operation. The LIL would be available for operation up to 700 MW under emergency conditions.

Hydro notes current reserve forecasts do not indicate any alert level will be triggered given current generation availability. Hydro closely monitors its supply-related assets and balances its system

[1] "Newfoundland and Labrador Hydro - 2023-2024 Winter Readiness Planning Report dated November 10, 2023 and Near-Term Reliability Report dated November 15, 2023 - Request for Additional Information," Board of Commissioners of Public Utilities, December 15, 2023.

accordingly to ensure reliable service to its customers. Hydro is confident in its ability to service its customers during the 2023–2024 winter season.

2) Hydro's most recent Operating Reserves procedure.

Hydro's most recent Operating Reserves procedure is included in Hydro's procedure document BA-P-012, found as Appendix G in the "Joint Storm/Outage Communications Plan" provided as an attachment to this response.[2]

3) The Customer Advance Notification Protocol.

As mentioned above, the "Joint Storm/Outage Communications Plan" document, a joint communication plan between Hydro and Newfoundland Power Inc., is attached to this response. The document outlines the notification methods to customers at each assessment level in the Operating Reserves procedure.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

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[2] This document summarizes Vale Newfoundland and Labrador Limited's Capacity Assistance Agreement with Hydro. As this agreement is for supply of capacity and energy to Hydro and does not affect the Industrial Service Agreements approved by the Board, Hydro is not seeking a Board Order with respect to this agreement at this time.

June 14

Updated: December 2023

Joint Storm/Outage Communications Plan

Newfoundland Power and Newfoundland and Labrador Hydro

This plan reflects the cooperation and coordination between Newfoundland Power and Newfoundland and Labrador Hydro with respect to Storm/Outage Communications.

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INTRODUCTION

Authority of the plan

This joint Storm/Outage Communications Plan (the Plan) is derived from Liberty Consulting Group Recommendation #44 which states: "*Hydro and Newfoundland Power should jointly develop a coordinated, robust, well-tested and up-to-date Storm/Outage Communications Plan documenting protocols, plans, and templates to guide communications during major events, beginning with preparation by June 15, 2014 of a detailed plan and schedule for doing so.*"

This Plan directs Newfoundland Power's and Newfoundland and Labrador Hydro's (the Utilities) communications activities during a major event that results in damage or interruption of power supply to the island interconnected electricity system. It is intended to ensure that the Utilities are the primary authoritative voice during a critical incident that affects either Company's operations. It enables both Corporate Communications Teams to quickly activate, and provides strategies, tools and templates to effectively communicate to customers, employees, media and key stakeholders during outage situations.

Plan Administration

This Joint Storm/Outage Communications Plan is meant to guide outage communications protocols, and the Utilities may deviate from the plan to the extent necessary in the circumstances to promote the health, safety and security of customers. Execution of the Plan is the joint responsibility of the Manager of Public and Government Affairs, Newfoundland Power, and the Senior Manager of Employee Engagement, Culture and Communications, Newfoundland and Labrador Hydro (Hydro).

The Manager, Public and Government Affairs, Newfoundland Power, and the Senior Manager of Employee Engagement, Culture and Communications, Hydro, are responsible for ongoing changes and ensuring plan maintenance. They will ensure that this Plan is reviewed and tested as required. The overall plan will be updated on an annual basis, with contact lists updated quarterly. In addition, communications debriefing sessions will be conducted after each major incident to evaluate the effectiveness of the Plan and the Utilities' response with a focus to identifying areas of improvement.

Statement of Joint Utility Cooperation

Newfoundland Power and Hydro generally play different roles with respect to the electricity system on the Island portion of the Province. Newfoundland Power's predominant role is to deliver to end-use customers the energy that Hydro generates and transmits. However, Hydro has a small number of end-use customers on the island portion of the province and serves all customers in Labrador, and Newfoundland Power has a small amount of generating resources.

Accurate and timely communication of information is critical when dealing effectively with outage situations and the restoration process. Both Utilities understand and respect the important role each plays in providing safe, reliable electricity to the people of the Province. Newfoundland Power and Hydro are committed to strengthening their existing intra-utility and inter-utility communications protocols and practices. This will ensure the timely and accurate sharing of information required to provide the most effective and consistent messaging possible to customers, key stakeholders and the public during outage events.

OBJECTIVES

- To provide a joint storm/outage communications plan that addresses the steps to be taken during a large-scale outage event, one which is actionable and accessible.
- To identify the appropriate communications response based on the outage impact to customers and degree of severity of the storm or outage.
- To follow a well thought out strategic plan that identifies the outage communications team, roles and responsibilities.
- To provide a checklist of actions and templates of key communications.
- To develop messaging that reassures the public that the Utilities are capable of managing the event and will fully cooperate to restore power as safely and quickly as possible.
- To provide accurate and timely updates that demonstrates empathy and concern for customers.

GUIDING PRINCIPLES

The Utilities will adhere to conduct that advocates transparency for all stakeholders, stays true to corporate core values and underscores the importance of ethical behavior during periods of outage communications. During outage events, the Utilities are committed to facilitating communications to reach the appropriate internal and external target audiences based on the following overarching guiding principles:

- Safety first
- Customer-focused
- Open/honest/transparent
- Timely/accurate/consistent
- Empathetic/caring/professional

Outage situations can cause immense pressure and uncertainty for employees and people connected to them. Whenever possible, internal communication should precede

external communication; at a minimum, internal and external communication should be simultaneous and provide consistent messages.

BACKGROUND

Newfoundland Power and Hydro are committed to protecting the safety of its employees, the public and the communities in which we live and work. This Plan will provide public and media responses in the event of any outage situation that significantly impacts the Utilities, its customers, stakeholders and its employees. Its role is to also preserve corporate reputation during and after an incident in order to maintain confidence in the electricity system.

Overview of the Provincial Electricity System

The Province is served by two electric utilities, Newfoundland Power and Hydro.

Newfoundland Power is an investor-owned utility that operates an integrated generation, transmission and distribution system throughout the island portion of Newfoundland and Labrador. The Company serves approximately 274,000 customers, making up approximately 87 per cent of all electricity consumers in the province. The Company purchases approximately 93 per cent of its energy needs from Hydro, and generates the balance from its own smaller hydroelectric stations.

Hydro, is a crown corporation, and the primary generator and transmitter of electricity in Newfoundland and Labrador. The Company serves three distinct customer groups: Newfoundland Power; approximately 38,000 customers in rural Newfoundland and Labrador; and, major industrial customers mainly in the pulp and paper, mining and oil refining industries.

The electricity system in the province is unique with the following characteristics that present significant challenges:

- according to Environment Canada, the province experiences some of the harshest weather conditions in North America, and a significant amount of infrastructure is located along the coastline and is subject to high winds, salt spray and ice;
- customers are widely dispersed across the province; and,
- many customers heat their homes electrically which makes system management challenging due to the seasonal variations with this type of usage.

Integration and Coordination with Other Plans

This Plan is aligned with, and meant to complement, the Utilities' other emergency response and business continuity plans. It should be read and executed in conjunction with applicable plans in the event of an interruption to operations, or an event impacting business continuity processes.

This Plan is designed to work in tandem with the following:

- Service Restoration Plan (NP)
- Emergency Preparedness and Response Plan (NP)
- Business Continuity Plans (NP)
- Outage Communications Protocol (NLH)
- Notification of Generation Reserves (NLH)
- Corporate Emergency Response Plan (NLH)
- Emergency Communications Plan (NLH)
- Business Continuity Plan (NLH)
- Emergency Plan for Generation, Transmission and Distribution (NLH)
- Restoration Plan for East Coast (NLH/NP)
- Operating Instructions BA-P-012 (NLH)

Inter-Utility Operation Coordination

Newfoundland Power's System Control Centre (SCC) and Hydro's Energy Control Centre (ECC) are central to the Utilities' response to major electricity system events, including severe weather events, failure of major system components and/or loss of supply. Operation coordination and scheduling of work between the two utilities is integral to the safe and reliable delivery of service to customers. This ensures that: one utility's actions will not unnecessarily affect the other utility's provision of service to its customers; and, that the joint actions of the two utilities are undertaken in a way which is least disruptive to the reliable delivery of electricity to customers.

Efficient and timely information flow between the Utilities is critical to the reliable operation of the electricity system. Improving the availability of information and establishing clear guidelines for customer communications between the Utilities will ensure customers receive timely, accurate and consistent messaging on the overall status of power disruptions and restoration efforts.

In addition, the Inter-utility System Planning and Reliability Committee, which includes senior operations and engineering management from Newfoundland Power and Hydro, meets monthly to consider matters related to system reliability, including reliability targets, system contingency and restoration planning, review system additions and major capital projects, generation availability and peak load management preparedness. This committee provides a forum that allows for frequent discussion and action on matters of operational importance between the Utilities that has the potential for service disruptions for customers.

TARGET AUDIENCE/KEY STAKEHOLDERS

This Plan addresses the information and communications needs of:

- customers (residential/commercial)
- employees/contractors
- media
- government (provincial/municipal/federal)
- first responders (FES/fire/police)
- Board of Commissioners of Public Utilities (PUB)
- Boards of Directors

Forthright, Simple Tone

The tone of messaging should be a confident one that leads the customer and key stakeholders to understand the Utilities as authoritative, credible, knowledgeable, engaging, respectful and caring/empathetic. The language must be understandable to the masses.

The Public, Customers and Stakeholders

One of the most critical aspects of any power restoration process is communicating with the public, and in particular with customers that are affected by the outages, in a timely manner. Residential and Commercial customers are interested in the cause of the outage, the areas affected, what the Utilities are doing to respond, and when power will be restored. It is the responsibility of the Utilities to keep the public informed in order to ensure public safety, and to allow customers and government officials to make informed decisions about the safety and well-being of their families and residents.

Employees and Contractors

Employees and contractors can be the Utilities' greatest asset during times of outages. Their visibility helps restore customer and public confidence that everything possible is being done to restore power. A strategic focus on demonstrating the Company's core values and beliefs through internal communications will assist with maintaining a positive work environment during what can be a long and challenging process-depending on the weather and extent of system damage. Providing timely updates and establishing external communications expectations protocols is important to maintaining a positive corporate image. If possible, providing a forum for employee engagement and feedback to gauge the effectiveness of external messaging can be helpful in refining and/or developing ongoing messaging.

Media

The media will get the story, with or without the Utilities help. Members of one or both of the Utilities' Communication Teams will interact with the media in a timely, open and honest manner. When dealing with members of the media, it is important to:

- demonstrate professionalism and be completely transparent, accurate, and factual at all times;
- be available for comment and response;
- be timely, and respect the increasingly fast pace of the news cycle; and,
- communicate with empathy by demonstrating understanding of the public's concerns.

IDENTIFICATION OF TYPE AND SEVERITY OF OUTAGE

There are a number of probable events that can have a significant impact on the ability of the electricity system to provide service to customers, with the vast majority of damages being caused by severe weather events. The magnitude and duration of the impact on the electricity system is directly related to the severity of the weather event, the particular section(s) of the electrical system affected and the extent of damages incurred.

Events impacting the electricity system generally fall into the following categories:

Weather-related	System Disruption	Supply Shortfall
• freezing rain • blizzard/winter storm • high wind • lightning • flooding or coastal storm surges • hurricanes or tropical storms • erosion and landslides	• distribution or transmission rights-of-way fires • electrical equipment failure • vandalism and sabotage	• loss of power supply • rotating outages • load shedding

Types of Major Outages

The different scenarios that could impact the electricity system can be broadly categorized as follows:

- **Major outage on either Newfoundland Power's or Hydro's system** – as a result of a natural disaster/severe weather or equipment failure (generally managed by the individual utility affected)
- **Major outage province wide –** as a result of a natural disaster/severe weather or equipment failure (requires a coordinated utility outage communications approach)
- **Loss of power supply by Hydro –** load shedding or rolling blackouts as a result of a provincial electricity system supply shortfall (requires a coordinated utility outage communications approach per the Operations Reserve Protocol - see Appendix G.)

Severity of Outages

The operational damage assessment, number of customers affected and the duration of outages will be used to determine the severity of outages as well as restoration efforts.

The Utilities categorize the severity of outages as follows:

Level	Common Characteristics	
	Newfoundland Power	**Hydro***
Level One	**Low** **System** – multiple lines and facilities affected. **Resources** – a single area is involved in the restoration and requires no support from other areas or regions. **Customer impact** – 2,000 customers or less without power. **Health and safety** – potential impact on customers and environment minimal. **Level of interest** – little or no interest/attention of the public or media beyond the local area. **Restoration** – within 24 hours.	**Minor** Local emergencies are managed on-scene and in coordination with local response agencies. Support from Corporate Emergency Operations Centre (CEOC) is not required.
Level Two	**Medium** **System** – multiple lines and facilities affected, likely including transmission lines and substations. Significant weather related damage. **Resources** – requires external support from other areas or regions and possibly Hydro but the impact of the event is limited to Newfoundland Power. **Customer impact** – between 2,000 and 10,000 customers without power. **Health and safety** – potential impact on customers and the environment is moderate. **Level of interest** – involves senior management, the PUB, media and the public. **Restoration** – expected to exceed 24 hours.	**Major** Local emergencies are managed on-scene and in coordination with local response agencies. Full or partial support from the CEOC is required.
Level Three	**High** **System** – multiple lines and facilities affected including transmission lines and substations over a large geographical area and/or supply shortfall. Widespread weather related damage. State(s) of emergency may be declared. Hydro's system may also be impacted. **Resources** – requires significant external resources that extend beyond Newfoundland Power. **Customer impact** – greater than 10,000 customers without power. **Health and safety** – protective measures may be required for customers and the environment. **Level of interest** – significant interest by executive/senior management, the PUB, government, FES, media and the general public. **Restoration** – expected to exceed 72 hours.	**Catastrophic** Emergencies cannot be managed on-scene even with support from local agencies. Full support from the CEOC is required.

* From Nalcor Energy Emergency Communications Plan.

Outage Severity Levels and Communications Response Strategies

The severity of the outage will determine the appropriate communications response. The following chart profiles normal operations and the three severity levels, and the corresponding level of communications response. The joint communications plan would typically be activated in response to a Level 2 or 3 event.

Severity Level	Communications Response Strategy	Strategy	Corresponding Operational Response Levels
Normal	**Low Level Reactive**	"Normal" is indicative of day-to-day operations. Corporate Communications will engage in daily, ongoing media and social media monitoring, and ensure that the storm/outage communications plan remains up-to-date and accurate.	Day-to-day operations. No corresponding response levels.
Level One	**High Level Reactive**	A Level 1 event may not warrant proactive communications efforts. However key members of the team will be activated to heighten media and social media monitoring and be prepared to respond to inquiries from the media with pre-determined statements and key messages as required. Specific customer service mechanisms in place to handle small scale outages.	NP – Level 1 - Low NLH – Level 1 - Minor
Level Two	**Low Level Proactive**	A Level 2 event would warrant a targeted, proactive approach. Corporate Communications will proactively communicate with impacted key stakeholders and local and/or regional media if interest is evident. The decision to issue a news release or hold a news conference for a Level 2 event will be made in consultation with the affected Regional Director and the Vice President and/or the President and CEO.	NP – Level 2 - Medium NLH – Level 2 - Major
Level Three	**High Level Proactive**	A Level 3 event would warrant a broad, high level, proactive approach. Corporate Communications will proactively communicate with all stakeholders (internal and external) as well as all local/provincial/national media as required. Not only actively distribute information to media and public, but would consider holding press conferences to provide updates which may involve other stakeholders.	NP – Level 3 - High NLH – Level 3 - Catastrophic

Communications Approach and Tactics

Level One:

Strategy	High Level Reactive Response	
Traditional Media	Monitoring	Heighten media monitoring. Receive regular monitoring updates.
	Production	Develop initial messaging and prepare media materials (media holding statements) to be used reactively.
	Engagement	Provide media interviews as requested.
Social Media	Monitoring	Heighten social media monitoring to determine number of mentions and level of engagement.
	Production	Develop social media key messages and standby statements to be used in the event of interest.
	Engagement	Respond to social media concerns as needed/use discretion (ensuring not to enflame a non-issue). If incident is acknowledged on social media channels, commit to providing timely updates as information becomes available.
Internal	Monitoring	Rely on affected area to determine if employee feedback warrants broader communication.
	Production	Prepare FAQ sheet in the event that employees ask about what has occurred.
	Engagement	Targeted internal communications as deemed appropriate. Rely on face-to-face communication from leaders to employees in the affected areas.
Website	Engagement	Ongoing updates to website.
Stakeholder	Engagement	Notify local municipal leaders as required.
Broadcast/Text	Engagement	Use outbound text.

Level Two:

Strategy	Low Level Proactive Response	
Traditional Media	Monitoring	Heighten media monitoring. Receive regular monitoring updates.
	Production	Using discretion, prepare and disseminate media materials (news release and media holding statements) to local outlets near affected areas.
	Engagement	Do follow-up media calls to outlets reporting on the incident offering interviews. Do one-on-one media interviews as requested. Commit to ongoing formal updates, as deemed necessary.
Social Media	Monitoring	Heighten social media monitoring to determine number of mentions and level of engagement.
	Production	Develop social media holding statements.
	Engagement	Acknowledge the incident on appropriate social media channels and commit to providing timely updates and information becomes available. Proactively engage on social media channels that are actively discussing problems or concerns relevant to the incident. Correct misinformation where appropriate. Commit to ongoing updates in the absence of concrete information.
Internal	Monitoring	Monitor feedback from employees. Use feedback to revise messaging externally and internally, as appropriate.
	Production	Prepare employee releases with regular updates as appropriate.

		Provide direction for employees on what to do if they are approached by the media.
	Engagement	Open two-way communication through the Executive/Managers blog to allow for feedback from employees.
Website	Engagement	Targeted messaging on outage page of website; ongoing updates.
Stakeholder	Engagement	Notify municipal, provincial reps as required as well as PUB and FES (as a courtesy).
Broadcast/Text	Engagement	Use outbound text.

Level Three:

Strategy	High Level Proactive Response	
Traditional Media	Monitoring	Heighten media monitoring. Use the findings to appropriately update messaging.
	Production	Prepare and disseminate media materials (media holding statements, news release and advisories where appropriate) to media outlets (television, radio, print, etc.).
	Engagement	Perform follow-up calls to all news outlets, offering either invitation to news conference or interviews with appropriate spokesperson or executive/subject matter expert as deemed appropriate. Consider holding news conference (within first business day) and for sustained crisis, hold daily news or teleconference press updates/briefings. Commit to ongoing updates (every 6-10 hours) for formal updates for as long as the event requires. Record and respond to all media requests.
Social Media	Monitoring	Heighten social media monitoring. Ensure frequent reports and updates.
	Production	Develop social media key messages and engagement strategy, determining which tools would be appropriate to use.
	Engagement	Engage in all major social media channels actively discussing the incident. Answer questions, correct misinformation and provide links to website or other credible sources of information. Reach out to any previously identified social media influencers offering context or explaining the incident.
Internal	Monitoring	Monitor feedback from employees. Use feedback to revise messaging externally and internally, as appropriate.
	Production	Create internal information updates for managers to disseminate to their teams and use appropriate internal communication tools such as employee releases and the blog.
	Engagement	Disseminate critical information updates on the intranet and post fact sheets. Consider using regular internal conference calls and briefings with senior management.
Website	Engagement	Takeover front page of website (dark website); ongoing updates.
Stakeholder	Engagement	Notify municipal, provincial reps as required as well as PUB and FES.
Broadcast/Text	Engagement	Use outbound text.
Advertising	Engagement	Consider use of advertising to supplement all other mediums.

Customer Communications

One of the most critical aspects of any restoration process is communicating effectively with customers who are affected by the outage in a timely manner. Depending on the outage level the delivery method for notifying and updating customers will vary. Strong

linkages exist between Corporate Communications and Customer Service to allow for the seamless sharing of information to ensure up to date, consistent and meaningful updates are provided to customers and key stakeholders.

Primary methods of communication with customers will vary for both utilities and includes:

- high volume telephone-based outage messaging system
- digital media (website, twitter, facebook, youtube, instagram)
- customer contact centre
- media
- broadcast messaging/texting/automated calls

Communications Timelines/Targets

The Utilities will, to the highest degree possible, adhere to a standard of timely communications. Balancing speed and accuracy is an important consideration when responding to outage situations. The following points should be considered when following the communications timeline policy below:

- While initial messages should outline as much information about the event as possible, not all the details will be known immediately. This shouldn't hinder the dissemination of high level messaging that indicates to the media and the public that the Utilities are aware a situation has occurred, and the situation is being handled/ mitigated, fixed and/or investigated.

- Communications tools and tactics, such as media holding statements, are mechanisms through which the Utilities have the opportunity to: acknowledge an incident; demonstrate to concerned stakeholders understanding and care about the impact the outages may have; assure the public that everything is being done to restore power as safely and quickly as possible; and, show commitment to transparent and timely updates as more information becomes available.

The following table outlines the minimum communications timeline targets to which the Utilities will strive to adhere:

Communication	Timeline Target
Initial social media acknowledgment	Within **15 minutes** for a confirmed Level 2 or Level 3 event post a holding statement. Electricity System Notifications, customer requirements and critical information i.e. conservation tactics posted as soon as alert level confirmed.*
Media holding statement	Within **30 minutes** for a Level 3 event brief holding statement information can be released. For Level 2, use discretion.
Website	Within **15 minutes** for a confirmed Level 2 or Level 3 event post a holding statement. Electricity System Notifications, customer requirements and critical information i.e. conservation tactics posted as soon as alert level confirmed.*
Internal communication	Within **1 hour** for a confirmed Level 2 or 3 event if required.
Media release	Within **1 hour** of mobilizing the communication team for a Level 3 crisis. For a Level 2 crisis, use discretion.
Media conference (if required)	**Before end of business day** for a Level 3 event (use discretion). *Ideal timing would be prior to the noon news (11:00 a.m.) or early afternoon.*
Formal updates for prolonged events (as required) • News releases, internal updates, media conferences, social media	As new information comes in: • Media updates via interviews or media release as substantial information changes are confirmed – use discretion. • Internal updates (as needed). • Social media/website (ongoing).
Stakeholder relations (as required)	Minimum of twice daily in the a.m. and p.m.

* Appendix G or H

ACTIVATION OF JOINT UTILITY PROTOCOL

In the event of a pending weather-related system that has the potential to impact the infrastructure of both Utilities, or an anticipated supply shortfall, a coordinated approach to communications will be essential. This coordination should commence a minimum of one to two days prior to the anticipated event to ensure lines of communications are open and any joint preparation or advance messaging is prepared and ready to go.

The following steps should be taken by the Utilities to share information and effectively communicate with customers and key stakeholders:

- Prior to Storm/Major Event (minimum two days prior to event)
    - Manager, Public and Government Affairs, Newfoundland Power, and Senior Manager of Employee Engagement, Culture and Communications, Hydro, will connect to review operational preparations and communications plans
    - the Utilities will provide advance customer/stakeholder notification messaging to the public and its customers to ensure they are aware of the impending event and are making the necessary preparations (see Appendix G)
    - Utilities will directly contact key customers, government (municipal and provincial) and FES as required depending on the severity of the pending event

- Requests for customer conservation (following the Operating Reserves Protocol-see Appendix G)
    - conservation messaging will also be used during cold load pick up situations to assist operations in restoring power to as many customers as possible Where there has been system or weather-related outages affecting a small number of customers

- Information sharing (during and after outage)
    - Once the level of severity is determined and initial assessments of the outages an customer impact has been made, the Utilities will immediately begin joint coordination
    - Hydro will generally take the lead on messaging related to provincial generation or transmission problems as well as issues related to its infrastructure, facilities and customers
    - Newfoundland Power will generally take the lead on messaging related to the distribution system as well as issues related to its electricity system, facilities and customers
    - To ensure timely, accurate and consistent messaging, each Utility will provide the other with media releases and key messages at least one hour prior to release to the public to allow for review and feedback as required
    - A joint, lessons learned session will be held within two weeks after each Level 2 or 3 event to review communications efforts and response to make any necessary improvements on a go forward basis

- Joint communications (internal and external)
    - Where appropriate, joint communications through media releases, media advisories, news conferences, etc. will be used to provide consistent messaging and instill confidence in the public that the Utilities are working together to restore power
    - Where appropriate, joint media interviews will be arranged to include both Utilities to ensure the full system perspective is provided
    - Joint communications will be prepared by the lead Utility and provided to the other Utility, a minimum of one hour in advance, to allow adequate time for review, feedback and approval

- Feedback/approval process
    - Individual Utility messaging will be shared and an opportunity provided for feedback to ensure its accuracy and consistency
    - Messaging that has the potential to impact both Utilities must be reviewed and approved by the Manager of Public and Government Affairs, Newfoundland Power, and the Senior Manager of Employee Engagement, Culture and Communications, Hydro

KEY MESSAGES

Messaging Priorities

Outage events go through a series of phases that are characterized by distinct priorities. Each of these priorities is based on expectations from the public during periods of heightened public scrutiny and uncertainty.

Advance

The majority of outage events are weather or environment related when there is generally advance notice or warning through weather forecasting and FES. Pending an event, messaging will focus on encouraging customers and the public to be prepared and reassure them that the Utilities are prepared to respond if required as well as remind them to always keep safety top of mind.

Initial Phase

The initial phase is that narrow period of time when the Utilities are conducting damage assessments and may not be in a position to provide specific details or to mobilize its forces to begin bringing the situation under control. It is important that the Utilities get in front of the situation as soon as possible, acknowledging the event with an appropriate tone of concern, and providing as much information as possible about what has happened and how they are working to restore power to restore confidence.

Maintenance Phase

The maintenance phase begins when the Utilities have a concrete understanding of the scope of the damage and resulting outages. The problem has been identified and the

public is aware of what has happened, but uncertainty remains around what caused the problem, how the organization is restoring the situation and the full extent of impact or damages. During this phase, media outlets and recognized opinion leaders are actively providing their opinions on the situation, the company's response to it, the emergency response effort itself, the plight of those affected, and who they believe is ultimately to blame. Specifically, in the maintenance phase, the Utilities must commit to timely and accurate information updates.

Resolution Phase

The resolution phase comes after the event is under control. The narrative around the entire event will be largely shaped by the Utilities response and communications efforts during the initial and maintenance phases. Much of the public will have formed an opinion about the situation so this phase remains important for the reputation recovery and overall assessment of the overall handling of the restoration effort.

Types of Messages

Event specific messaging will be developed based on the type and severity of the outage, with a focus on the specific damage to the electricity system, the areas affected, the restoration plan and estimated time for restoration.

However, the following generalities may be utilized throughout the process:

- **Safety**: Nothing is more important to us than ensuring the safety of our employees, our contractors, our customers and the public. We are committed to safe work practices and public safety education. Share links to safety sections of the Utilities websites.

- **Customer Service**: Our customers are at the centre of everything we do. They deserve the best and we deliver – everyday. Share links to outage information sections of the Utilities websites.

- **Reliability**: For our customers, it's about keeping the lights on. We are committed to increasing our reliability by upgrading our infrastructure and continuing maintenance work.

- **Conservation/Energy Efficiency**: It is important for customers to conserve...saving energy means saving money, and using resources wisely is the right thing to do from an environmental perspective.
    - takeCHARGE has rebate programs to assist customers manage their energy usage and save money on their electricity bills.
    - Reduces cold load pickup and helps us get more customers back on more quickly

- **Be Prepared**: Share links to preparation information sections of the Utilities websites as well as other appropriate websites such as the government.

- **Contact info/how to report an outage/how to report an emergency situation**

ONGOING AND POST EVALUATION

Evaluation methods will include media monitoring, social media metrics, public sentiment, calls to contact centre and website analysis. The number of requests for media interviews will also be used as a gauge of public interest as well as tone and interest on various radio call-in shows. Ongoing discussions and feedback from stakeholders as well as a post-event review will be used to identify potential areas for improvement. All tracking activities and logs must be completed and filed for post-event evaluation.

Utilities will undertake joint research with the assistance of an external research supplier at their discretion. The research would allow for more intensive input from customers into communications and customer service activities with a view to making improvements.

APPENDICES

Appendix A – Roles and Responsibilities

Outage Communications Responsibilities

Newfoundland Power

Manager, Public and Government Affairs (Michele Coughlan)

- outage spokesperson/media liaison
- government relations (provincial and municipal)
- key stakeholder engagement
- liaison with FES
- provides ongoing updates to Board of Directors and PUB as required
- corporate counsel for executive
- notify executive and corporate communications team of communications issues as they arise
- liaison with Director, Customer Relations, and Director, Technology and SCC
- liaison with Senior Manager of Employee Engagement, Culture and Communications, Hydro
- press conference planning

Senior Communications Specialists (Renee Paul; Kirsty Tatlow)

- digital media (social media and website)
- liaise with Manager, Public and Government Affairs, Newfoundland Power, to ensure consistent messaging between traditional and social media as well as employee communications
- internal communications including employee release, blog and webster
- assist with media releases, media advisories, safety advisories, key messages
- social media monitoring
- assist with press conference planning as required

Communications and Community Relations Specialist (TBD)

- media monitoring
- website
- assist with stakeholder engagement as required
- maintain media and outreach logs
- record keeping and document control
- contact centre backup as required
- liaise with Manager, Public and Government Affairs, Newfoundland Power

Newfoundland and Labrador Hydro

Outage Communications

For low level severity or "normal" operations outages and Level one (minor):

This is the responsibility of the Senior Manager of Employee Engagement, Culture and Communications, the Director of Public Affairs and Customer Service, and the communications' on call team, Hydro. Responsibilities include:

- Liaise with Energy Control Centre, field operations team and customer service
- Social media monitoring and updates as required
- Public advisories as required
- Media interviews as required
- Liaise with VP, Corporate Relations and VP, Hydro, as necessary
- Government relations as necessary (provincial and municipal)
- Key stakeholder engagement as necessary
- Updates to Board of Directors as necessary
- Internal communications if required
- Liaison with executive and corporate communications team on issues as they arise

Emergency Communications

For level two (major) or three (catastrophic) events, Hydro's Corporate Emergency Response Plan (CERP) may be activated.

All emergency roles and responsibilities for Hydro are clearly detailed in Hydro's CERP.

Appendix B – Contact Lists

Joint Communications Contact List

Newfoundland Power

Michele Coughlan
Manager, Public and Government Affairs
Work: 709-737-2821
Cell: 709-682-1470
Email: mcoughlan@newfoundlandpower.com

Renee Paul
Senior Communications Specialist
Work: 709-737-6125
Cell: 709-685-5802
Email: rpaul@newfoundlandpower.com

Kirsty Tatlow
Senior Communications Specialist
Work: 709-737-2852
Cell: 709-682-7357
Email: ktatlow@newfoundlandpower.com

TBD
Communications and Community Relations Specialist
Work: 709-737-5646
Cell: TBD
Email: TBD

Newfoundland and Labrador Hydro

Erin Squires
Senior Manager, Employee Engagement, Culture & Communications
Work: 709-737-1311
Cell: 709-697-1186

Deanne Fisher
Director, Public Affairs and Customer Service
Work: 709-733-5299
Cell: 709-697-3418

Janine McCarthy
Senior Communications Specialist
Work: 709-737-4255
Cell: 709-631-0056

Mark King
Senior Communications Specialist
Work: 709-733-5301
Cell: 709-725-6055

Jill Pitcher
Senior Communications Specialist
Work: 709-737-1219
Cell: 709-689-9938

Diane Martin
Communications Advisor
Work: 709-737-1429
Cell: 709-725-6947

Amy Callahan
Communications Advisor
Work: 709-733-4496
Cell: 709-691-5053

Provincial Media Contact List

All Newfoundland and Labrador:
alex@allnewfoundlandlabrador.com
news@allnewfoundlandlabrador.com
renell@allnewfoundlandlabrador.com

Atlantic Business Magazine:
ashley@atlanticbusinessmagazine.com

Canadian Press:
sarah.smellie@thecanadianpress.com

CBC:
terry.roberts@cbc.ca
hereandnow.nl@cbc.ca
Peter.Cowan@cbc.ca
Mike.Rossiter@cbc.ca
Lisa.Gushue@cbc.ca
centralmorning@cbc.ca
labradormorning@cbc.ca
bailey.white@cbc.ca
matt.mccann@cbc.ca
cbrookradio@cbc.ca
bernice.hillier@cbc.ca
daniel.maceachern@cbc.ca
mark.quinn@cbc.ca
darrell.roberts@cbc.ca
rob.antle@cbc.ca

Radio-Canada:
patrick.butler@radio-canada.ca

NTV:
news@ntv.ca
mconnors@ntv.ca
westcoast@ntv.ca
lbeaudoin@ntv.ca
bhoward@ntv.ca

The Telegram/Saltwire:
telegram@thetelegram.com
pframpton@thetelegram.com
juanita.mercer@thetelegram.com
andrew.robinson@thetelegram.com
diane.crocker@saltwire.com

Newfoundland Herald:
pghent@nfldherald.com
dcollins@nfldherald.com

VOCM:
feedback@vocm.com
chcm.newsroom@vocm.com
cfsx.news@vocm.com
cbfrontdesk@vocm.com

Other:
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email@hot991.ca

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email@krockrocks.com
outofthefog@rci.rogers.com
okradio@oksociety.com
news@boir.ca

For Copy Paste:
sarah.smellie@thecanadianpress.com, alex@allnewfoundlandlabrador.com, news@allnewfoundlandlabrador.com, ashley@atlanticbusinessmagazine.com, terry.roberts@cbc.ca, hereandnow.nl@cbc.ca, Peter.Cowan@cbc.ca, Mike.Rossiter@cbc.ca, Lisa.Gushue@cbc.ca, centralmorning@cbc.ca, labradormorning@cbc.ca, bailey.white@cbc.ca, matt.mccann@cbc.ca, cbrookradio@cbc.ca, bernice.hillier@cbc.ca, daniel.maceachern@cbc.ca, mark.quinn@cbc.ca, pghent@nfldherald.com, dcollins@nfldherald.com, news@ntv.ca, mconnors@ntv.ca, westcoast@ntv.ca, lbeaudoin@ntv.ca, telegram@thetelegram.com, pframpton@thetelegram.com, juanita.mercer@thetelegram.com, feedback@vocm.com, chcm.newsroom@vocm.com, cfsx.news@vocm.com, editor@theshoreline.ca, email@hot991.ca, ozfm@ozfm.com, onair@coast1011.com, email@krockrocks.com, outofthefog@rci.rogers.com, okradio@oksociety.com, cbfrontdesk@vocm.com, andrew.robinson@thetelegram.com, patrick.butler@radio-canada.ca; news@boir.ca; darrell.roberts@cbc.ca, diane.crocker@saltwire.com, renell@allnewfoundlandlabrador.com, bhoward@ntv.ca, rob.antle@cbc.ca

Provincial Government Contact List

(Note: The most up-to-date contact list from government's website will be used during an event.)
http://www.gov.nl.ca/departments.html

Provincial Government Communications Contacts http://www.releases.gov.nl.ca/Contact

Members of the House of Assembly

http://www.assembly.nl.ca/members/cms/membersalpha.htm

Municipal Government Contacts

http://miga.gov.nl.ca/municipal_directory/index.html

Appendix C – Checklists

Press Conference Checklist

Set Up Required:

- ☐ Theatre style (most common). Make sure the centre aisle is wide enough to accommodate camera people.
- ☐ View premises as a TV camera would; ensure the background image will not distract from speakers of reflect badly on the company.
- ☐ Podium plus company logo or sign if available.
- ☐ Head table with skirting if possible.
- ☐ Tent cards identifying all spokespeople.
- ☐ Rise for head table if required.
- ☐ Retain an area with appropriate background for follow-up one-on-one TV and radio interviews.
- ☐ Media sign-in table outside or inside doorway
- ☐ Directional signage for facility to simply direct to the news conference location.
- ☐ Have coffee/water available if possible.

Audio Visual Requirements:

- ☐ Microphones for podium and/or head table depending on the number of participants and availability of equipment.
- ☐ Laptop computer and projector if used.

Preparing for the Media:

- ☐ Send out a media advisory. Do this as far in advance as possible. Give the date, time and place of the news conference as well as the topic and the spokespeople if these are known.
- ☐ Provide a media sign-in sheet (copy provided) to report back who attended the news conference.
- ☐ Arrange media monitoring.

News Conference:

- ☐ Prepare media kit containing:
    - News release with contact names(s) and numbers
    - Backgrounders and fact sheets as available
    - List of all participating spokespeople with titles
    - Copies of any presentation given
- ☐ Always try to convince participants to have a dry-run in advance. It helps iron out kinks and prepares them for questions and answers.
- ☐ Have a member of Corporate Communications act as moderator to: set the agenda, introduce the head table and facilitate the question and answer period.
- ☐ Set time parameters from the start and limit the time for questions and answers.

Media Sign-In Sheet

Name	Media Outlet	Phone #	Email Address

Appendix D – Templates/Forms

MEDIA RELEASE TEMPLATE

MEDIA RELEASE

Utilities Working on Power Restoration

For Immediate Release: (Month, Day, Year)

(PLACE): Newfoundland Power and Newfoundland and Labrador Hydro are currently assessing system damage resulting from (INSERT REASON).

Provide update on current situation, include:

- X customers have been impacted (include Region/Communities most affected)
- Estimate restoration times, if available
- Crew updates (i.e. assessing damage, on the way to the site, on site, restoring power)
- Safety messages/warnings

Newfoundland Power and Newfoundland and Labrador Hydro would like to thank customers for their patience during this outage. Remember to put safety first: to report downed lines or an emergency situation call Newfoundland Power at 1-800-474-5711 or Hydro at 1-888-737-1296.

With a customer base of approximately 269,000 accounts, Newfoundland Power Inc. is committed to safety and dedicated to providing the highest level of customer service and reliability of electricity in the most cost-efficient manner possible. For more information on Newfoundland Power's programs, services and community partnerships, please visit newfoundlandpower.com.

Hydro to INSERT BOILERPLATE HERE

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For further information, please contact:

Jill Pitcher
Senior Communications Specialist
Newfoundland and Labrador Hydro
Phone: (709) 737-1218
Cell: (709) 689-9938

Michele Coughlan
Manager, Public Affairs
Newfoundland Power Inc.
Phone: (709) 737-2821
Cell: (709) 682-1470

MEDIA ADVISORY TEMPLATE

MEDIA ADVISORY

For Immediate Release: (Month, Day, Year)

'Subject Title'

Re: *(Specifics of the incident)*

Date: *(Day, Month date, Year)*

Location: *(Building name, Exact Address, Parking Considerations)*

Reason: *(Specific details regarding areas of public interest that will be addressed)*

Who: *(Key speakers, Newfoundland Power and Hydro representatives, etc.)*

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For further information, please contact:

Jill Pitcher
Senior Communications Specialist
Newfoundland and Labrador Hydro
Phone: (709) 737-1219
Cell: (709) 689-9938

Michele Coughlan
Manager, Public Affairs
Newfoundland Power Inc.
Phone: (709) 737-2821
Cell: (709) 682-1470

Media Request Log

Prepared by: _____ Date: _____

Time	Contact Name/Media Outlet	Contact Information	Details of request	Status of Request (Request met? Still waiting?)

Stakeholder Contact/Outreach Log

During a crisis situation, Newfoundland Power will be required to communicate with a variety of stakeholders, depending on the type of crisis and those affected. To help prioritize and identify specific affected stakeholders for targeted communications outreach, refer to this tool.

STAKEHOLDER COMMUNICATIONS LOG						
INCIDENT:			**DATE:**			
Stakeholder	**Strategic Considerations**	**Key Messages**	**Communications Tactics**	**Owner**	**Actions Planned/Taken**	**Results/Remarks/ Coordination with Corporate Communications Team**
Regulatory Agencies						
Government Officials						
Employees and Families						

STAKEHOLDER COMMUNICATIONS LOG						
INCIDENT:			**DATE:**			
Stakeholder	**Strategic Considerations**	**Key Messages**	**Communications Tactics**	**Owner**	**Actions Planned/Taken**	**Results/Remarks/ Coordination with Corporate Communications Team**
Contractors and Suppliers						
Community Residents and other impacted stakeholders						
Multi-Stakeholder Organizations						

STAKEHOLDER COMMUNICATIONS LOG						
INCIDENT:			**DATE:**			
Stakeholder	**Strategic Considerations**	**Key Messages**	**Communications Tactics**	**Owner**	**Actions Planned/Taken**	**Results/Remarks/ Coordination with Corporate Communications Team**
Environmental and Other Special Interest Groups						
Media						
Others						

STAKEHOLDER COMMUNICATIONS LOG						
INCIDENT:			**DATE:**			
Stakeholder	**Strategic Considerations**	**Key Messages**	**Communications Tactics**	**Owner**	**Actions Planned/Taken**	**Results/Remarks/ Coordination with Corporate Communications Team**

Appendix E – Sample Messaging

Sample Messaging

Preparedness

- We are ready and prepared be to respond to any power interruptions or emergency situation.

- We focus on maintaining two critical functions in the face of disasters:
    1. Delivering reliable electrical service to our customers; and,
    2. Maintaining communications with our customers, stakeholders and employees.

- We have contingency plans in place to deal with any type of a disaster. In fact, we have Business Continuity Management Plans for every aspect of our operations, from electrical system failures to loss of technology, to a fire at one of our buildings.

- These plans are tested on a regular basis to ensure that employees are fully aware of their roles, to ensure that our equipment, technology and communications devices are working properly, and to ensure that we are as familiar as possible with our continuity plans so that we can respond immediately and efficiently.

- For example:
    - We have back-up generation for all of our offices;
    - We have materials and equipment strategically located throughout the island should inventory become an issue;
    - We have back-up communication and computer systems;
    - We have a very mobile workforce; and,
    - We have key contacts in other utilities, should we require the extra assistance or materials.

- As bad weather approaches...Plan ahead. Be prepared AND be safe! Check out our tips on how to prepare
  http://www.newfoundlandpower.com/Outages/HowToPrepare.aspx
  https://nlhydro.com/good-to-know/

- To report outages or damage to the electricity system visit newfoundlandpower.com or call 1-800-474-5711. Hydro customers can call 1-888-737-1296.

Conservation

- What can customers do?
    - Residential Customers:
        - Reduce electric heat by a few degrees
        - Conserve hot water by not running dishwashers, washers and showers
        - Avoid using clothes dryers
    - Business customers:
        - Only heat spaces where and when necessary – reduce temperatures or shut off heating in vestibules, stairwells, lobbies and unused spaces
        - Reduce equipment use during peak periods
        - Reduce lighting – turn off outdoor safety and security lighting at the start of each day and turn off non-essential indoor lights, outdoor signs, billboards and other lighting

- Conservation/Energy Efficiency: It is important for customers to continue to conserve...saving energy means saving money, and using resources wisely is the right thing to do from an environmental perspective.
    - takeCHARGE has rebate programs to assist customers manage their energy usage and save money on their electricity bills.

- As your power is restored please try to reduce usage to assist with restoration to all customers as safely & quickly as possible.

- Customers are being asked to avoid unnecessary electricity usage, particularly during peak use times: 7:00 a.m. to 10:00 a.m. and from 4:00 p.m. to 8:00 p.m.

- Residential customers can reduce electric heat by a few degrees, avoid drying clothes, and conserve hot water by not running dishwashers, washers, and showers.

- Businesses can help by reducing temperatures, only heating necessary spaces, reducing equipment use during peak periods, and turning off turning non-essential indoor lights and outdoor signs and billboards.

Safety

- Safety of our customers and employees is our first and foremost priority

- Crews will work around the clock to restore customers' power unless it is determined that conditions (such as weather) pose a risk to safety.

- We are working directly with FES, and other emergency service providers.

- Priority to respond immediately to all emergency and safety calls.

- When an outage occurs:
    - Check lights in your home to see if they are working, and check to see if your neighbours have power. If others still have power, it may be a tripped breaker or a blown fuse that has caused the outage.

    - If there are no lights on in the neighbourhood, please report online or call Newfoundland Power's outage reporting service (1-800-474-5711) to receive outage information, or to report downed wires, trees or broken poles.

    - To avoid damage to your appliances and equipment, and to reduce the load on the electricity system when power is restored, we recommend you:
        - unplug all electronic equipment and appliances such as TVs, computers, microwaves and stereo equipment;
        - turn off your range, washer, dryer and water heater;
        - turn your thermostats to the lowest setting or switch them off; and
        - keep only one light on to let you know when power has been restored.

    - If your basement floods, don't enter unless you're sure the water is not in contact with a source of electricity such as an appliance or heater, electrical outlet or extension cord. Call an electrician to disconnect the power before entering if you are unsure. Never touch a circuit breaker with wet hands or while standing on a wet floor.

    - Turn on your battery powered radio to get information about the outage.

Assessment/System Damage

- It is not always possible to determine a problem or damage immediately

- Crews often have to patrol a line. This means sometimes having to go into back country to locate a problem. Helicopters are sometimes needed to fly crews and materials in to the problem area.

- Severe weather conditions such as ice, sleet, snow and high winds can often make a problem area inaccessible. This week our crews had difficulty getting to some locations because of impassable roads.

- When needed, crews from other areas of the province (or other provinces if necessary) are used to assist with restoration efforts

Customer Appreciation

- The Company appreciates customers' patience
- We realize any outage is an inconvenience -- and that extended outages are especially difficult.
- We thank our customers for their patience.
- We also thank the many customers who have provided kind words of praise to our line crews for their efforts.

Situation Specific

- Provide regular updates on:
    - Regions/Communities/Areas/ affected
    - Number of customers affected
    - Restoration efforts
    - Realistic timelines
    - Safety concerns/warnings
    - How to get in touch with us

Appendix F –Social Media Holding Statements

Newfoundland Power:

- Currently experiencing widespread outages due to loss of power supply from NL Hydro. We'll share more info as available. Updates ow.ly/KcgkC

- Widespread outages due to loss of power supply from NL Hydro. Info at ow.ly/KcgkC/18004745711. Thanks for your patience as cause investigated.

- Approx. XX.XXX @NFPower customers are currently without power due to loss of power supply from @NLHydro. For updates on affected areas, visit ow.ly/KcgkC

- @NFPower working with @NLHydro to begin restoring power to customers as generation becomes available. Thanks for your patience. More info ow.ly/KcgkC

Electricity System Notifications:

- Electricity system status **Power Watch** in effect**.** Watching system closely. Be prepared to conserve. More info

- Electricity system status **Power Warning** in effect. Plse conserve electricity. Be prepared for rotating outages. More info

- Electricity system status **Power Emergency** in effect. Currently rotating power outages. Plse conserve electricity. More info
  - Rotating power outages expected to last approx. 60 min. Thank you for your continued patience. More info ow.ly/KcgkC

Newfoundland and Labrador Hydro:

Generation Issue-
@NLHydro is experiencing a generation issue. Approximately xx customers are currently without power.

Transmission Issue -
@NLHydro is experiencing an issue with transmission line feeding the Avalon Peninsula. This has caused outages to approx. xx customers.

Unknown issue –

@NFPower working with @NLHydro to determine the cause of current power outages. More information will be provided as known.

Appendix G – Operating Reserves

BA-P-012
Operating Reserves[1]

General

Purpose

This procedure outlines the requirements to assess and maintain sufficient operating reserve to meet current and anticipated customer needs under normal operating conditions and for specific contingency situations that result in reductions to resources. Contingency events may also occur that cause the Labrador Island Link (LIL) and Maritime Link (ML) Frequency controllers to activate to support the Island frequency. Balance to the neighbouring utilities (Nova Scotia Power and Hydro Quebec) must be restored within 15 minutes of the event. Resources are comprised of contributions provided by supply- side and demand-side facilities and/or actions. Supply-side facilities include utility and non-utility generation and may include reserve assistance or imports from neighbouring systems. Demand-side facilities include measures for reducing load, such as interruptible load, demand management and conservation and reducing ML exports.

In order to ensure that customer service is maintained, the Energy Control Centre (ECC) shall exercise its authority to reduce risks to resources and maintain sufficient operating reserve to meet current and anticipated customer demands. The ECC shall be prepared to deal with generation and other resource capacity shortages and take appropriate actions, including stakeholder notification, in order to communicate and maintain the reliability of the Island Interconnected System.

Operating reserve[2,3,4] is required to replace resource capacity lost as a result of an equipment forced outage as well as to cover performance uncertainties in generating units and tie-line capacity, or to cover unanticipated increases in demand. Sufficient operating reserve is required to meet current and forecasted demands under the largest resource contingency:

- the largest generating unit on the island interconnected system. This is covered fully by 10 minute reserves;
- the largest combination of generating units on a single interface (e.g., generation connected to the transmission system via a single transmission line). This is covered fully by 10 minute reserves; or
- the largest import over a single transmission interface. This would include the LIL Bipole when in operation.[5]

[1] Part of the Emergency Response Plan.

[2] *Operating Reserve*, for the Island Interconnected System, is defined as the capability above firm system demand required to provide for regulation, load forecasting error, equipment forced and scheduled outages and includes 10 minute and 30 minute reserve.

[3] 10 minute reserve is included in Operating Reserve and is reserve that is fully available within 10 minutes of a request and includes both spinning and non spinning (non connected generaton and demand reduction) components.

[4] 30 minute reserve is included in Operating Reserve and is reserve that is fully available within 30 minutes of a request and includes both spinning and non spinning components.

[5] 30 minute reserves will be carried for a trip of the LIL Bipole delivered at Soliders Pond less exports over the Maritime Link (i.e. Net DC deliveries to the Island system). See section 1.1 for details.

Table of Contents

1 Procedure

1.1 Maintaining 10/30 minute Reserve and On-Line Regulating Reserve

Under normal operations the ECC shall take action to meet a targeted 10-minute Reserve that is sufficient to cover the loss of the largest single resource contingency on the Island Interconnected System. Typically this is Holyrood Unit 1 or 2 (170 MW) or Bay d'Espoir Unit 7 (154.4 MW).

For the LIL, if the amount of LIL being sunk on the Island (i.e. the LIL amount delivered at Soldiers Pond less Maritime Link Exports), is greater than what would normally be maintained for 10 minute reserve, there shall be 30 minute reserve (additional to the 10 minute reserve) to cover the full Loss of the LIL and what is being sunk on the Island[6].

During real time and contingency operations the ECC shall take steps to maintain a minimum Regulating Reserve of 70 MW for system frequency regulation. Such actions include the following: placing in service all available generating capacity, cancelling outages to generating units that have a short recall, recalling export transactions, increasing LIL deliveries above current schedule (if possible), deploying all available standby and demand side resources, including Corner Brook Pulp and Paper Capacity Assistance and Vale Generation as well as Newfoundland Power curtailable load, cancelling industrial interruptible load, and further reducing system load through procedures such as voltage reductions.

The ECC should request capacity and energy from the market through Energy Marketing group (EM) when it deems that resources and load reduction strategies are not sufficient to reliably meet current or forecasted demand. Under a contingency event, the ECC can request Reserve Assistance from the Nova Scotia Power System Operator (NSPSO) which, if available, can be activated within ten minutes and extended for up to 120 minutes. Following the 120 minutes, Emergency Energy may be made available from NSPSO under commercial arrangements. **Note that Reserve Assistance and Emergency Energy are not firm products and may not be available or may be recalled by the NSPSO at any time following its activation.**

The following guideline shall be followed by the ECC Shift Supervisor – Reliability, and System Operator – Balancing and Interchange in the sequence outlined in order to maintain sufficient on-line Regulating and 10-minute Reserve in order to maintain the reliability of the Island Interconnected System.

- **Sequence for Maintaining 10-minute and On-Line Regulating Reserve *****

[6] This will include staffing gas turbines as required.

1.1.1 Resource Dispatch

*** Note that under a contingency event (e.g. the sudden loss of a large generating unit) – perform the actions in Section 1.3 – Reserve Assistance and Emergency Energy to provide time to carry out the steps listed below, while market-based real-time energy transactions are being sought and implemented.

1. Place in service all of Hydro's available hydroelectric generation.
2. Increase LIL above current delivery schedule (to the extent possible while respecting LIL/ML relationship and Labrador reserve requirements).
3. Request Newfoundland Power to maximize their hydroelectric generation.
4. Maximize Holyrood thermal generation.
5. Make a request to cancel outage(s) to hydroelectric generating unit(s) that have a short recall.
6. Curtail recallable export transactions (export transactions on non-firm transmission service) in accordance with the priority set forth in the NL Transmission Policies and Procedures and as described in BA-P-005.
7. Start and load standby generators, both Hydro and Newfoundland Power units[7].
8. Request Corner Brook Pulp and Paper for Capacity Assistance (up to 90 MW of load reduction in block sizes of 20, 40, 60, or 90 MW) [8].
9. Request Vale Generation (up to 10.8 MW – standby diesels).
10. Request Newfoundland Power to interrupt its Curtailable loads (typically up to 10 MW and can take up to two hours to implement).

1.1.2 Load Reduction

1. Cancel all non-firm power delivery to customers and ensure all industrial customers are within contract limits.
2. Inform Newfoundland Power of Hydro's need to reduce supply voltage at the major delivery points to minimum levels to facilitate load reduction. Implement voltage reduction.
3. Request Newfoundland Power to implement voltage reduction on its distribution system.

1.2 Maintaining Frequency near the Standard 60 Hz

If the Regulating Reserve continues to decrease below the minimum level and all resources and load interruption strategies have been deployed, the system frequency should be watched closely. In order to protect the integrity of the system, and to avoid the potential for cascading outages the system frequency shall be maintained above 59.8 Hz. **If not already performed, the ECC should request capacity and energy from the market through the Energy Marketing group (EM) to support the system frequency and minimize any customer impact.**

[7] At this point in time it is important the ECC notify customers taking non-firm power and energy that if they continue to take non-firm power, the energy will be charged at higher standby generation rates.

[8] Up to 90 MW contractually available from November 1 – April 30.

Sequence for maintaining frequency near the standard 60 Hz ***

1.2.1 Activation of Labrador Reserve

When resources have become depleted in maintaining 10 minute reserve and there is a risk of not being able to regulate frequency (i.e. a deficient regulating reserve), the LIL will be increased (while continuing to adhere the LIL/ML scheduling relationship so as not to risk system instability) to the point that the required reserve in Labrador may not be maintained[9].

1.2.2 Firm Load Interruption

*** Note that under a contingency event (e.g. the sudden loss of a large generating unit) – perform the actions in Section 1.3 – Reserve Assistance and Emergency Energy to provide time to carry out the steps listed below, while market-based real-time energy transactions are being sought and implemented.

1. Request Industrial Customers to shed non-essential loads, informing them of system conditions.
2. Request Newfoundland Power to shed load by rotating feeder interruptions and Nova Scotia Power to curtail ML firm deliveries.[10] At the same time, shed load by rotating feeder interruptions in Hydro's rural distribution areas. Follow instruction for rotating outages, CMN-P- 020.

1.3 Contingency Event

In the event of a sudden resource contingency, the Regulating Reserves may go below 70 MW. Contingency events include a trip of a unit or sudden deration, a requirement for a sudden offload and shut of a unit, or a failed start. In this case, the LIL and ML frequency controllers could activate to help support the island frequency.[11] For the LIL, once the frequency returns to 59.7 hZ, the frequency controller will deavtivate. For the ML, once the frequency returns to 59.5 hZ, the frequency controller will deactivate. For these scenarios, actions may be required to return the LIL and ML power flows to pre contingency levels within 15 minutes. Actions outlined in section 1.1.1 will still be implemented. However, because of the time limitations, increasing HRD (if capacity still available) and requesting CBBP Capacity assistance maybe the quicker options.

In the event of a LIL Bipole trip, automatic runbacks and/or frequency response will occur to reduce the flow on the ML. The ECC System Operator will immediately call the Nova Scotia System Operator and will curtail any remaining ML flow related to the Nova Scotia Block. Following the activation of runbacks and/or frequency responsē and when the system frequency stabilizes, the Nova Scotia System Operator shall adjust the Maritime Link Power flow to the pre contingency power flow value minus the Nova Scotia Block.

As well. Please note that only under a contingency event can the ECC request Reserve Assistance or Emergency Energy from the Nova Scotia System Operator (NSPSO) – per

instruction *BA-P-007 - NLSO - NSPSO Reserve Assistance Responsibility and Activation* and *BA-P-037 -NLSO - NSPSO Emergency and Security Energy Transactions and Activation.*

[9] In the event a Muskrat Falls unit trip, balancing with Hydro Quebec may not be achievable in 15 minutes.

[10] This will be done on a pro-rata basis for NP, NSPI and NLH.

[11] LIL frequency controller activates at 59.7 hZ and ML frequency controller activates at 59.5 hZ.

Reserve Assistance

- Reserve Assistance is available as a short term product (within 10 minutes) following a contingency event. The ECC System Operator may request Reserve Assistance up to 50% of the contingent loss to a maximum of 100 MW. The initial period is up to 30 minutes.
- During the initial 30-minute Reserve Assistance period the ECC System Operator should perform the steps as outlined above in Sections 1.1.1 to 1.1.2. If sufficient resources are not available the ECC System Operator shall request a market based solution (i.e. contact Energy Marketing).
- In the event that on-line Regulating and 10-minute Reserve requirements are not able to be met by internal resources in 30 minutes, Reserve Assistance can be extended for an additional 90 minutes (only if available from the NSPSO system).
- All energy provided under Reserve Assistance is treated as inadvertent.

Emergency Energy

- Emergency Energy can be sought from NSPSO as a last resort, when market-based real-time energy transactions are not available in a timely fashion in order to maintain on-line Regulating and 10-minute Reserve requirements.
- Emergency Energy is a commercial product with pre-defined energy rates.

1.4 Calculation, Assessment and Notification of Available Reserve[12]

Available Reserve shall be calculated in the manner indicated below:

- Available generation[13] of NLH (Hydro + Thermal + Standby[14] + Purchases[15]); plus
- Scheduled firm Import transactions on the Maritime Link; plus
- Scheduled deliveries on the Labrador-Island Link; plus
- Available generation of Newfoundland Power (Hydro + Standby); plus
- Available generation of Deer Lake Power (60 Hz Hydro); plus
- Vale Generation[16] (Standby Diesels); less
- Forecasted Island peak load (adjusted for Corner Brook Pulp and Paper Capacity Assistance, Newfoundland Power Curtailable and Voltage Reduction)[17]; less
- Scheduled Exports on the Maritime Link with firm and non firm transmission service.

The Available Reserve will be calculated for the current day and the following six days for the peak demand hour forecast for each day. An assessment will be made against the criteria in the table below with notifications to be issued to stakeholders when Available Reserve is below the stated thresholds for anytime within the next week.

[12] Available Reserve calculations will include the LIL deliveries sinking on the island

[13] Available generation is generation that is in service or planned to be in service..

[14] Standby generation includes gas turbine/diesel generation.

[15] *NLH* Purchases include wind generation for the current day based on actual wind output, but assumes no wind generation for the following six days.

[16] Refer to Schedule 1 at the end of this procedure for the details of the agreement.

[17] Up to 20 MW of load reduction (on peak) is expected to be achieved through the reduction of voltage at the major delivery points on the island interconnected system as well as on Newfoundland Power's distribution system.

Available Reserve[18]	Expected Action	Level
> [Largest Single Contingency + 70 MW]	None	0
> [Largest Single Contingency] and < [Largest Single Contingency + 70 MW]	Prepare for Potential Load Reduction	1
> [½ Largest Single Contingency] and < [Largest Single Contingency]	Load Reduction	2
> [Zero or deficit] and < [½ Largest Single Contingency]	Conservation	3
> [Zero or deficit; hold f=59.8 Hz]	Rotating Outages	4

Based on the assessment above, perform the following:

- **Level 0**
  - If the Available Reserve is anticipated to be greater than the largest single contingency plus 70 MW, the ECC is not expected to perform any further actions, other than to advise the appropriate stakeholders that Available Reserve has returned to normal following a prior Level 1, 2, 3, or 4 notice.
- **Level 1**
  - If the Available Reserve is anticipated to be less than the largest single contingency plus 70 MW, the ECC will notify Newfoundland Power's Control Centre and NLSO On Call to advise them of the possible requirement for load reduction strategies should the Available Reserve decrease.
- **Level 2**[19]
  - If the Available Reserve is anticipated to be less than the largest single contingency, the ECC will notify Hydro's Exec On-Call under the Corporate Emergency Response Plan (CERP),[20] Corporate Communications On Call,[21] Newfoundland Power and NLSO On Call to advise them of the requirement for load reduction strategies should the generation shortfall not be corrected. The ECC shall also notify the Nova Scotia System Operator (NSPSO) of the potential deficit in Available Reserves.
- **Level 3**
  - If the Available Reserve is anticipated to be less than half of the largest single contingency, the ECC will notify Hydro's Exec On-call (CERP), Corporate Communications On Call, Newfoundland Power and NLSO On Call to advise them of a requirement for customer conservation strategies should the generation shortfall not be corrected. The ECC shall also notify the NSPSO of the potential deficit in Available Reserves.

[18] Hydro plans to have Available Reserve to cover its largest resource contingency (e.g., largest generating unit) plus an additional 70 MW. The assessment of Available Reserves is currently used by Corporate Communications for purposes of the joint communication plan between NLH and Newfoundland Power.

[19] Level 2 alerts could be issued for Emergency LIL Monopole operation. See section LIL Monopole operation below.

[20] As part of the CERP, the Exec On-Call makes the decision to activate the Corporate Emergency Operations Centre (CEOC).

[21] Corporate Communications is responsible for activating the joint communication plan between NLH and Newfoundland Power.

- **Level 4**
    - If the Available Reserve is anticipated to approach zero or fall into a deficit, the ECC will notify Hydro's Exec On-call (CERP), Corporate Communications,Newfoundland Power and NLSO On Call to advise them of a requirement for rotating outages should the generation shortfall not be corrected. The ECC shall also notify the NSPSO of the potential deficit in Available Reserves.

LIL Monopole Operation

In the event of unplanned monopole operation of the LIL:

- The NLSO will endeavor to activate on-Island reserve to bring the remaining pole back to monopole limits.
- Under monopole limits, LIL flows will be reduced such that if there is a trip of the remaining pole there is enough ML runback to prevent underfrequency load shedding (UFLS) and customer impact on the Island.
- In the event that the LIL cannot be reduced to monopole limits, it will be operated in "emergency mode". Once it is determined that the LIL will be operated in "emergency mode", then a public notification of a Power Watch (as per the above Level 2) will be issued. Operating in emergency mode, is outside of the normal operating criteria in that a single contingency (i.e. the loss of the remaining LIL pole) can result in customer interruption. Available Reserves will also be reassessed to determine the impact of the next largest contingency and if further alert level notification is required.
- Under no circumstances will the LIL be operated in monopole configuration such that there is a risk of stability or system collapse if the remaining pole trips. The ECC shall adhere to "Emergency" LIL monopole limits when operating under these conditions.

The following is the standard message that will be communicated by Corporate Communications and posted on the NLSO OASIS website if it is anticipated that a notification is to be made under Level 2, 3, or 4 or a return to Level 0 (note that a Level 1 notification is only communicated between the two control centres of Newfoundland Power and the NLSO):

> *"The NLSO is advising that the Available Island reserve is at (or has returned to) a notification level [0, or 2–4] for [insert date here]. The Available Reserve is expected to be [insert reserve amount in MW], calculated from an available resource capacity of [insert available capacity in MW] and a peak load forecast of [insert peak forecast in MW]."*

Refer to CMN-P-008 *NLSO OASIS Communication Protocol* for further information on posting messages in OASIS.

Reference Documents

CMN-P-008 *NLSO OASIS Communication Protocol*

CMN-P-020 *Rotating Outages*

BA-P-005 *Curtailment, Interruption and Reload Procedures*

BA-P-007 *NLSO - NSPSO Reserve Assistance Responsibility and Activation*

BA-P-037 NLSO - *NSPSO Emergency and Security Energy Transactions and Activation*

NLH and NSPI Interconnection Operators Agreement, 07/31/2012, Schedules A2, C9 and C10

Schedule 1 – Capacity Assistance Arrangements

Provider	Contracted Capacity	Conditions
Corner Brook Pulp and Paper	**<u>Winter (Nov 1–Apr 30)</u>** Up to 90 MW (or another higher amount as tested and agreed by the parties) in the following increments: • 20 MW • 30 MW • 60 MW • 90 MW • Other if tested and agreed	• Notification Period: 10 minutes • Interruption Period: 4 hours (minimum) to 6 hours (maximum) • Maximum Number of Curtailments*: 2 per day, 30 per year • Total Assistance Period: 180 hours per year* • Expiry: 15 years (2023/24 – 2038/39) • Test: Tested annually in Sept – Oct • *An additional 90 hours/30 calls available at a variable rate
Vale Generation	**<u>Winter (Dec 1–Mar 31)</u>** Up to 10.8 MW. Requested amount based on annual test	• Notification Period: 20 minutes • Interruption Period: Up to 6 hours (maximum) • Maximum Number of Curtailments: 2 per day, 20 per winter • Total Assistance Period: 100 hours per winter • Term: December 1 2023 to March 31 2024 • Test: Tested annually in November

Document Summary

Document Owner:	Team Lead, Energy Control Centre
Document Distribution:	NLSO, NLSO Operating Committee, NSPI, NP, Resource and Production Planning

Revision History

Revision	Prepared by	Reason for change	Effective Date
24	J. Tobin	Minor edit to fix Section reference	2020/04/14
25	J. Tobin	Modifications throughout the document on how the LIL will be treated in the interim. Added Section 1.3 on contingency event. Modification on LIL for Available Reserves (Section 1.4). Modifications to Schedule 1 for Capacity Assistance agreements.	2023/12/01
26	J. Tobin	Added wording on LIL Monopole operation in Section 1.4.	2023/12/15
27	J. Tobin	Revised wording in Section 1.4 on LIL Monopole operation	2023/12/21

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Issued: 2018/07/06 Last Reviewed: 2023/12/21

Appendix H –Electricity System Notifications

ELECTRICITY SYSTEM NOTIFICATIONS

POWER WATCH

- **No immediate** action required.
- Electricity system being **watched closely.**
- **Be prepared** to conserve electricity if asked.

POWER WARNING

- **Conserve electricity.**
- This is a **warning** that current day electricity supply is getting close to maximum demand.
- **Be prepared** for possible rotating power outages.

POWER EMERGENCY

- **Rotating power outages** in effect.
- **Conserve electricity.**
- **Safety** should remain your highest priority when utilizing alternate sources of power, heat or light in your homes.

Visit newfoundlandpower.com/SaveEnergy
or NLHydro.com for tips on how to conserve.

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