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September 27, 2019

VIA E-PORTAL FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

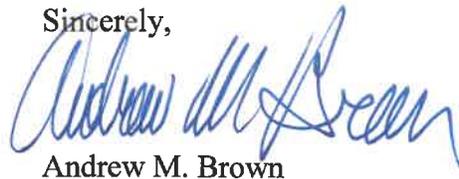
Re: Docket No. 20190109-GU - In re: Petition of Peoples Gas System for Recovery of Costs Associated with Hurricane Michael and Replenishment of Storm Reserve

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Response to Staff's First Data Request (Nos. 1-9).

Your assistance in this matter is greatly appreciated.

Sincerely,


Andrew M. Brown

AB/plb

Attachment

cc: Office of Public Counsel (via email: fall-fry.mireille@leg.state.fl.us)
Ms. Paula K. Brown
Ms. Kandi M. Floyd
Ms. Karen Bramley
Mr. Luke Buzard

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

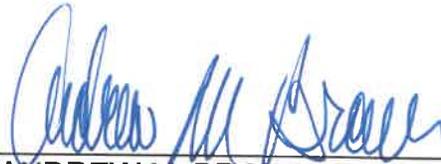
In re: Petition for recovery of costs associated
with Hurricane Michael and replenishment of
storm reserve, by Peoples Gas System

Docket No. 20190109-GU
Submitted for Filing: 9-27-2019

**NOTICE OF SERVICE OF RESPONSE TO
STAFF'S FIRST DATA REQUEST (Nos. 1-9)**

Peoples Gas System, by its undersigned attorneys, files this its Notice of Service
of Response to Staff's First Data Request (Nos. 1-9).

Dated this 27th day of September, 2019.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Peoples Gas System's Response to Staff's First Data Request (Nos. 1-9) has been furnished via electronic mail to the following, this 27th day of September, 2019:

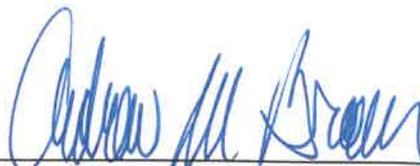
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Andrew M. Brown

**PEOPLES GAS SYSTEM
DOCKET NO. 20190109-GU
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
PAGE 1 OF 1
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1. Refer to page 3, lines 6-8. Please provide examples of “new improvements identified” that would be updated in Peoples’ Gas Delivery Emergency Preparedness Plan?
 - A. Over the past nine months Peoples has taken significant steps to improve upon its Emergency Preparedness Plan (“Plan”). First, a new position, Coordinator of Emergency Management, was created under the Safety group to focus solely on administering the Plan. The team member in this role has a bachelor’s degree in Public Health with a concentration in Community Engaged Homeland Security and Disaster Management. This team member has been focused on further aligning the Plan and associated processes with FEMA’s Incident Command System (ICS). Ongoing improvements include restructuring and reassignment of roles to more fully align with ICS sections and standard roles.

During the summer of 2019, Peoples’ Coordinator of Emergency Management, visited service areas across Florida to:

- Evaluate storm and emergency response preparedness.
- Identify gaps within the Plan and service area preparedness.
- Inquire with the service areas regarding the need for assistance in improving preparedness.

Peoples has also recognized the need to increase training across the company regarding emergency preparedness. In May of 2019, additional training on the Plan was developed and delivered to all Peoples service areas and workers. In addition, in the first half of 2019, Peoples leadership completed the following online FEMA independent study courses:

- IS-100: Introduction to the Incident Command System
- IS-200: Basic Incident Command System for Initial Response
- IS-700: An Introduction to the National Incident Management System

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- 2.** Please refer to page 4, lines 1-5.
 - a. How does Peoples determine who critical customers are?
 - b. Please describe Peoples' predetermined prioritization process.
 - c. Please describe Peoples' methodology to ensure safety and gas service is provided promptly.

- A.**
 - a. Peoples maintains a list of critical facilities that are deemed important to the safety and wellbeing of the community. Such customers include, hospitals, nursing homes, schools, government facilities, and facilities that may be related to national security etc. Additionally, at the time of an event, the company collaborates with the local emergency operations centers to ensure situational awareness on response and impacts to critical customers.
 - b. The system must be evaluated and made safe before service can be restored. Emergency situations such as blowing gas lines must be addressed first. Once the system has been made safe, then the priority restore list is utilized as an input in forming operational plans for restorations. These operational plans provide the basis for restoration to critical facilities before restoration is made to residential and commercial customers.
 - c. See attached Gas Delivery Emergency Preparedness Plan – Section 5 which is provided in response to Request Number 9.

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- 3.** Please refer to page 9, lines 14-24.
- a. Did Peoples start incurring costs for securing additional contractors on October 8, 2018?
 - b. Why did Peoples not start the convoy of storm responders until October 10, 2018?
- A.**
- a. No, Peoples did not incur cost for securing additional contractors on October 8, 2019. Immediately after the storm, Peoples' personnel performed the damage assessment to determine what initial steps were needed to make the system safe and what subsequent steps were needed to repair the system.
 - b. Immediately following the hurricanes landfall and movement away from Panama City, and upon the all clear signal from the state Emergency Operations Center, the Panama City Division personnel immediately began responding to emergency leak calls and making the system safe in accordance with Peoples' Gas Delivery Emergency Plan.

Peoples began its pre-storm planning efforts for Hurricane Michael five days prior to the forecasted landfall, these planning efforts lead to the organization of an emergency response team of Peoples personnel from various operating divisions from around the state organized and pre-staged, outside of the impact area in Gainesville on Wednesday October 10th. This team of responders were staged in Gainesville outside of the direct impacts of the storm to ensure the safety of team members. In the early morning of October 11th, the Peoples' caravan of emergency responders started to travel to Panama City. Travel was hampered by the closure of roads due to the destruction and lack of law enforcement escorts. The team made their way directly into the impacted areas on the afternoon of October 11th and immediately began the safety assessments and undertook efforts to make damaged or leaking gas lines in the natural gas system safe.

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- 4.** Refer to page 10, lines 1-17. Please clarify if the damage assessors were use to make emergency calls or were other contractors responsible for this task.

- A.** After the storm passed on the 10th, the Panama City Division personnel immediately began responding to emergency leak calls, commenced preliminary damage assessments, and conducted make safe operations. When the Peoples emergency operations response team arrived, they, along with the Panama City Division personnel, continued with emergency response and a more comprehensive damage assessments of the impacted areas. This was done through a zoning process designed to enable prompt assessments and identification of gas system damages, and the associated make safe efforts of leaking or damaged gas lines. These efforts were made by field-based technicians within the assigned work zones and did not include contractor resources. Peoples employees responded to all emergency leak calls and contractor support personnel were used for system repair efforts associated with damage to the gas facilities under the direction of Peoples.

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- 5.** Please refer to page 11, lines 14-21. How did Peoples determine to demobilize its response team on November 1, 2018?
 - A.** Peoples closely monitored the progress of work being done to make the system safe and fully operational and progress advanced to a point that Peoples determined that the emergency situation had been stabilized and could be effectively managed by the Panama City division personnel and the assigned contractor support team without the additional support of the Peoples emergency response team that was made up of team members of neighboring operational divisions.

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- 6.** Please refer to page 13, lines 3-11. Did Peoples have a contract with Storm Services, LLC prior to Hurricane Michael making landfall?
 - a. If so, when was the contract initiated?
 - b. If not, what was Peoples plan for lodging?

- A.**
 - a. Since 2006, Tampa Electric Company has maintained an open purchase order with Storm Services, LLC to provide disaster relief services for base camps or other individual items, tents, bunk houses, showers, catering, etc. Based on shared services agreements between TECO entities, Tampa Electric has authority to extend such services to support restoration efforts inside or outside its service territory, including Peoples Gas service locations.
 - b. Peoples had plans for lodging, however, due to the extent of storm damage, the hotels identified for lodging were without power and/or unavailable.

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- 7.** Refer to page 14, lines 3-7. Please explain the “contractor networks” that Peoples relied on to access external resources.
 - A.** Peoples has master and blanket contracts in place with its approved contractor network. These agreements establish the scope of services to be provided and the associated contract rates.

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8. Refer to page 15, lines 3-6. Please provide examples of lessons learned by Peoples from Hurricane Michael.

A.

- (a) **Lesson Learned:** Division administrative staff were taken away from their normal job positions to fulfill EOC representative positions. As a result, there was a lack of staff to document and carry out administrative work during the recovery response.

Recommended Action: The Peoples Coordinator of Emergency Management will work with the Community Affairs team to supplement EOC representatives during times of prolonged activations, as well as bring in EOC representatives from inactivated counties to assist if needed. Additional personnel in non-critical roles should be assigned to the planning section to assist with documentation and administrative work as needed.

- (b) **Lesson Learned:** There was significant dependence on one cellular communications provider during the response leading to communication limitations.

Recommended Action: Alternate carrier agreements shall be secured and made available during emergency response. Additional phones or SIM cards shall also be made available. Agreements with mobile communications carriers for delivery of mobile repeaters post-storm shall be pursued.

- (c) **Lesson Learned:** During the response to Hurricane Michael, Peoples was able to utilize an empty lot adjacent to the service area office for the base camp; however, every service area does not have a similar area if needed.

Recommended Action: Primary and secondary incident base locations shall be determined prior to storm season for each service area. Formal contracts with land/business owners should be pursued in this process.

- (d) **Lesson Learned:** The initial convoy to Panama City was large, making it difficult to keep the company responders together. This convoy was also inhibited by a lack of law enforcement escort.

Recommended Action: Create a plan or a section within the emergency preparedness plan for how convoys should be structured. This plan may include breaking up the response team into several groups of vehicles and proactively

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working with TECO Corporate Security and/or the FPSC to secure law enforcement escorts for each convoy.

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- 9.** Refer to page 3, lines 3-5. Please provide a copy of Peoples' Gas Delivery Emergency Preparedness Plan.

- A.** Please see the attached plan.

	GAS DELIVERY EMERGENCY PREPAREDNESS PLAN
Revised: July 2019	Program Owner: PGS Safety Dept.

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INTRODUCTION

Policy Statement

Gas Delivery leadership and employees will prepare for and respond to emergencies in a way that preserves and ensures employees and customers' safety and protects property. If service is interrupted, we will strive to restore service in a timely manner.

The decision to implement the plan, and to what degree, will be determined by PGS Company Command. This decision is based on the scope of gas system and/or customer outage and the man-hours estimated to restore it. If the damage is severe, the incident base and foreign crew concept will be implemented. If the restoration effort does not require incident bases and foreign crews, the plan will be implemented to the extent deemed necessary. The plan may be implemented to a different degree in each operating area, reflecting the restoration effort needed in each.

Purpose of the Plan

The Purpose of the PGS Operation's Emergency Preparedness Plan is to:

- Prepare the company for incidents of all types and improve resiliency in responding to these incidents.
- Identify emergencies and establish action plans for those situations.
- Set up communication procedures within the company, for the news media, our customers, and members of the general public.
- Identify mobilization procedures designed to better use personnel and other resources available from within and outside the territory.
- Ensure emergencies are handled professionally, and in a safe and effective manner.

SECTION 2 – ICS / INCIDENT COMMAND SYSTEM

The Incident Command System (ICS) is a modular organization with a manageable span of control. The ICS modular organization allows the commander of a structure to manage any type and size of emergency. ICS uses consistent terminology and an integrated approach to communications and resources.

The Incident Command System (ICS) is to be used for all incidents. The degree of ICS activation and notification required will depend on size and severity of the event.

2.1 BASIC ELEMENTS OF ICS

ICS utilizes the following basic guiding procedures to achieve incident management:

- Identify an Incident Commander.
- Identify General Staff Chiefs and Command Staff, as the emergency requires.
- Establish an incident command post and staging areas.
- Formulate the strategic and tactical goals.
- Develop an Incident Action Plan (IAP) to capture the strategy, ICS organization, tactics, communication methods, and safety.

- Identify and mobilize resources.
- Provide progress updates.
- Reevaluate incident operations and IAP.
- Demobilize resources post-incident.

Incident Management Priorities

The three priorities of ICS are:

- Life Safety
- Incident Stabilization
- Property Conservation

2.2 ICS POSITIONS AND RESPONSIBILITIES

To effectively utilize ICS, specific roles are activated during an emergency. Each of these positions serve a specific purpose, eliminating confusion on duties and increasing efficiency and accuracy. ICS divides most of these positions into the Command Staff and the General Staff (which includes Operations, Planning, Logistics, and Finance/Administration sections), with the exception of the Incident Commander who does not belong to either group. The Logistics Support Unit (LSU) is an additional group through TECO that assists in emergencies.

Prior to an incident, the TECO Energy Emergency Management website should be visited for the latest version of ICS information for download or printing.

Incident Commander and Command Staff

The incident commander has overall management responsibility for the incident and acts as the initial spokesperson for the company, especially in relations with emergency responders. The command staff reports directly to this position and assists in completing the incident commander duties.

The incident commander is typically the first person to arrive on scene to an incident and does not have to be someone in a leadership position. This individual will serve as the incident commander until someone in a higher role can or needs to take over (typically this is a predetermined individual).

The command staff consists of Public Information Officers (PIOs), Safety Officers (SOs), Regulatory Officers, and Liaison Officers (LNOs). Additional positions may be added to this group that help serve the functions of the Incident Commander.

Operations Section

This section is led by an **Operations Section Chief**. Key responsibilities of this role include:

- Managing all tactical operations during an incident.
- Developing tactical organization and directing all resources to carry out the Incident Action Plan.

Within this section, there are divisions correlated to each geographical division of PGS. Each division has an operations division leader, usually the division manager or supervisor, that assists in managing all tactical operations during an incident, relevant to that PGS division. These divisions shall report to the Operations Section Chief.

Functional groups may be created during an incident, based on need and the type of incident. This should be decided by the Operations Section Chief in correlation with each division leader.

Planning Section

This section is led by a **Planning Section Chief**. Key responsibilities of this role include:

- Assisting in developing the Incident Action Plan.
- Conducting and facilitating planning meetings.
- Collecting and managing all incident-relevant operational data.

Logistics Section

This section is led by a **Logistics Section Chief**. Key responsibilities of this role include:

- Providing resources and services needed to support the incident.
- Providing facilities, transportation, communications, supplies, equipment maintenance and fueling, food services, and all off-incident resources.

This section/unit works in correlation with the TECO Logistics Support Unit, especially in times of large-scale emergencies.

Finance/Administration Section

This section is led by a **Finance/Administration Chief**. Key responsibilities of this role include:

- Monitoring incident-related costs.
- Providing overall fiscal guidance.
- Ensuring that personnel time records are completed accurately.

Within the finance/administration section, there are units that carry out other responsibilities that supplement those of the Finance/Administration Chief.

SECTION 3 – EMERGENCY COMMUNICATIONS

3.1 EMPLOYEE CONTACT INFORMATION

PGS team member contact information can be found under the PGS Command on the Emergency Management website under. Information included in this document includes names, titles, locations, reporting to managers, home addresses, and work/cell/home telephone numbers.

See [Appendix D](#): PGS Employee Contact Information

3.2 EMERGENCY INFORMATION HOTLINE

In an emergency, PGS team members can call the following toll-free number and extension to receive 24-hour PGS updates and status information. The information can also be contacted using the direct dial number.

The toll-free number is **888-575-8326**: ext. **34903** (direct dial 813-228-4903).

Call Center: Use designated TEC 24 Hour Information Message Line

Human resources will update these messages. See [Appendix D](#): *HR Hotline Message Sample* for a template script for the hotline.

Update the hotline by calling the TECO voicemail system (813-275-3971). Type in the appropriate mailbox number for the hotline you wish to update (e.g., West Florida Ops, East Florida Ops or Corporate Office). Enter password: **TECOPGS** or **8326747**.

Note: These hotlines are for TECO voice mailboxes designated for this specific use. Messages are set up as temporary messages without an expiration date. Updating them is the same as all other TECO voice mailboxes. Follow instructions and voice prompts. Operations will direct message information to be reported.

3.3 LOGISTICS / FAMILY ASSISTANCE HOTLINE

For logistics calls with specific requests (i.e., meals, fuels), logistics personnel can call: **813-630-6800**. Team members in need of family assistance can also call this number. The extent of family assistance depends on the severity of the emergency, but can include food, water, and lodging assistance.

3.4 ICS PGS COMPANY COMMAND CONFERENCE BRIDGE

In an emergency, PGS Company Command will use the following conference bridge for scheduled and unscheduled emergency preparedness calls. The name of the conference bridge group is "Gas – Delivery." The name of the call is "PGS."

813-228-4800 (internal ext. **34800**) Conference ID: **747247**

SECTION 5 - EMERGENCY SITUATIONS & RECOVERY PROCEDURES

5.1 DAMAGE ASSESSMENT

An emergency is defined as anything that adversely affects our ability to provide normal service to our customers, i.e., loss of gas pressure; loss of communication or electrical service and anything that places our employees, customers, or members of the general public in an unsafe or hazardous situation.

In emergency situations, the **Local Operations Manager** and **Damage Assessment Team** (made of individuals from multiple areas) will convene to:

- Assure all local operations and/or departments are informed and involved, if necessary, in the emergency.

- Assist in the assessment of the damage.
- Assist in the recovery procedures necessary to restore the division back to its normal operation.

See [Appendix D: Hurricane Preparedness & Recovery Checklists](#) for a complete list of recovery activities to be conducted by a Damage Assessment Team.

The Damage Assessment team will update PGS Operations Section Chief (Director Operations) on:

- Continuing damage assessments.
- Number of customers without gas service.
- Damages to property or facilities.
- Any existing or probable unsafe or hazardous conditions resulting from the emergency.

The PGS Operations Section Chief is responsible for the following:

- Determine personnel resource requirements.
- Determine material and supply requirements.
- Implement emergency communication procedures.
- Establish central and field operation center[s], if necessary.
- Communicate Territory/emergency status to the **PGS Incident Commander**.

The PGS Incident Commander (VP Operations) is responsible for the following:

- Designate type and category of emergency.
- Communicate operational status to others in the **TECO Unified Command**.

Note: For insurance purposes, a video or photographs of all damaged facilities will be made before repairs are complete.

5.2 NATURAL GAS OUTAGES

The following procedures will be followed if a natural gas outage is suspected.

Verification of Interruption of Gas Service

In addition to the procedures outlined in the [TECO Peoples Gas Emergency Procedures Manual](#), sections [3.1.8.13] through [3.1.8.16], the following procedures will be in effect when an interruption or the possibility of an interruption of gas service has occurred:

- Local Operations will identify the area affected.
- Local Operations will verify gas availability and pressure checks as required.
 - No area will be assumed not to have had an interruption of gas service until a field check has been performed.

When the Customer Contact Center continues to receive calls from customers who do not have gas and an outage or low gas pressure is suspected, operations personnel shall be dispatched to the suspected area.

In addition to checking the premises of those customers who have called, neighboring accounts shall also be checked to verify if they are experiencing similar problems. This information shall be related directly to Local Operations as soon as possible. Local Operations will determine if an interruption of gas service has occurred and the area affected, and also monitor system pressures and keep Territory Operations informed of any irregularities.

Interruption of Gas Service Has Been Verified

When an interruption or an outage has been verified, the following procedures, in addition to the procedures contained in the [TECO Peoples Gas Emergency Procedures Manual](#), shall be implemented:

- Local Operations shall provide lists of customers affected to PGS Command.
 - These lists will be obtained from the CIS browse list. If the computer system is down and/or a CIS browse list is not available, the Paper Log Report or the Hurricane Report will be used to obtain the list of affected customers.
- Local Operations will be responsible for procuring hurricane report printout as deemed necessary (i.e. minimum of 72 hrs. prior to storm/hurricane has been identified).
- Local Operations will cross reference the list of affected customers using GIS and CIS computer generated lists of affected customers.
- Handwritten PGS 3's will be issued for each affected customer. The PGS 3 will be utilized to make safe [turn service off, lock and tag]. Another handwritten PGS 3 will be utilized to restore service to each account.
- Once the Field Operations Center area is identified, all personnel delivering materials or supplies, or reporting to work, shall report to this location.

In selecting the field operations center, the following factors should be considered:

- Sufficient parking.
- Safe vehicle entrance and exits.
- Minimum inconvenience to our customers and members of the general public.

The following items shall be made available to the Field Operations Center from Territory and Local Operations:

- Printed maps of the affected area [3 copies] or downloads of most recent updates to GIS on each machine.
- CIS customer browse lists or list of affected customers [3 copies].
- Other required materials and supplies. [See [Section 7: Mobilization Procedures](#)]

Make Safe

A PGS 3 will be completed for each affected customer. As soon as PGS 3's are available and properly filled out with the customer's name, address and meter number, if available, gas services will be turned off, locked and tagged using locks painted a "Day-Glow" green color.

When all the accounts have been made safe, Territory/Local operations shall be notified. Gas will be introduced into the system after all necessary repairs have been completed, as outlined in the [TECO Peoples Gas Emergency Procedures Manual](#).

Restoration of Gas Service

After distribution mains have been purged and re-pressurized, personnel shall proceed to restore service using the same PGS 3 forms used to turn the services off. [Make Safe].

Turn-on and turn-off procedures as outlined in the [TECO Peoples Gas Emergency Procedures Manual](#) shall be followed.

Gas Delivery Outage Categories

The following is a description of the five outage categories based on the number of customers affected and personnel required to make safe and restore service.

CATEGORY ONE - 1 TO 100 CUSTOMERS:

- Make safe/turn-off - 1 to 5 utility technician personnel.
- Restore/turn-on - 1 to 8 utility technician personnel.
- One Field Operations Center.
- Work Coordinators and Customer Contact Center (bilingual) representatives as necessary, depending on volume of calls and geographical area affected.

CATEGORY TWO - 101 TO 200 CUSTOMERS:

- Make safe/turn-off - 6 to 10 utility technician personnel.
- Restore/turn-on - 8 to 15 utility technician personnel.
- Call in trained personnel not normally assigned.
- One Field Operation Center.
- Work Coordinators and Customer Contact Center (bilingual) representatives as necessary, depending on volume of calls and geographical area affected.

CATEGORY THREE - 201 TO 500 CUSTOMERS:

- Make safe/turn-off - 10 to 20 utility technician personnel.
- Restore/turn-on - 15 to 30 utility technician personnel.
- Call in trained personnel not normally assigned.
- Call in outside contractor personnel **
- One Field Operation Center.
- Work Coordinators and Customer Contact Center (bilingual) representatives as necessary, depending on volume of calls and geographical area affected.

CATEGORY FOUR - 501 TO 1,000 CUSTOMERS:

- Make safe/turn-off - 20 to 50 utility technician personnel.
- Restore/turn-on - 30 to 60 utility technician personnel.
- Call in trained personnel not normally assigned.
- Call in Outside Contractor personnel. **
- One Field Operation Center.

- One or more Satellite Work Operations Centers.
- Work Coordinators and Customer Contact Center (bilingual) representatives as necessary, depending on volume of calls and geographical area affected.

CATEGORY FIVE - OVER 1,000 CUSTOMERS:

- Make safe/turn-off - Maximum personnel requirement [see note].
- Restore/turn-on - Maximum personnel requirement [see note].
- Call in trained personnel not normally assigned.
- Call in Outside Contractor personnel. **
- One Field Operation Center.
- One or more Satellite Work Operations Centers.
- Work Coordinators and Customer Contact Center (bilingual) representatives as necessary, depending on volume of calls and geographical area affected.

NOTE: Categories four and five outages will require all Territory personnel resources plus personnel resources from outside contractors and personnel available from other Gas Delivery Operations Territories.

** Outside Contractor personnel must have been previously certified by PGS on the job functions they will perform. If they are not certified, they can be certified on the job under emergency conditions.

Restoration of Service Priority

1. Hospitals
2. Emergency shelters
3. Police and Fire stations
4. Municipal buildings
5. Schools
6. Industrial accounts
7. Commercial accounts
8. Residential accounts

Restoration Safe Work Environment

Consideration for a safe working environment must be given for Company and outside contractor personnel when making safe [turn-off] or restoring service [turn-on].

Working after dark in most locations can create unsafe working conditions and often inconveniences the customer we are attempting to serve. Therefore, whenever possible working after dark should be avoided, except under the following circumstances:

- During the winter season when it becomes dark very early.
- Make safe or restoration of service can be completed before 10:00 P.M. and customers are aware we have personnel working in the area.

Additional items to be considered during a gas outage:

- Notify the local Municipality, Police, and Fire personnel, informing them that we will have gas personnel working in the area. Give approximate times we will start and stop working.
- Designate personnel in the office and in the field to handle any news media requests. Consult [Section 6 - Communications](#) if a large outage occurs.

Outage Resources Inventory

Resources required for an outage will depend on the size of the outage and location of the incident base. See [Appendix: Outage Resource Inventory](#) for Incident Base and Task Force Resources as needed.

5.3 NATIONAL EMERGENCIES

During times when the United States may be at war or the threat of war exists, or there is a threat of terrorist activities or terrorist attacks occur, additional security measures will be taken as follows:

1. All company personnel and sub-contractors will be required to wear identification badges at all times during work shifts or anytime personnel are on company property.
2. All gates into the facilities where applicable will remain closed at all times. Only designated personnel and vehicles will be allowed to enter.
3. All visitors must check-in and receive visitor badges and be cleared by local management before they are allowed to remain on company property.
 - a. This also includes customers or members of the general public conducting normal business at our division or district offices if going beyond general customer service areas within the facility.
4. Special precautions will be taken at our natural gas gate stations, regulator stations and any other plant facilities that may be vulnerable to damage by outside forces.

The action plan implemented will depend on the severity of the situation.

THREAT ONLY

All areas noted under item [4] will be monitored and physically checked on a daily basis.

STRONG THREAT

Activities have been reported by federal or state police agencies. Place guard services or provide continual surveillance at all locations noted under item [4].

GAS COMPANY FACILITIES A KNOWN TARGET

Request assistance from local and or state law enforcement agencies to implement a security plan.

5.4 HURRICANES

The following emergency situations may arise if a major hurricane strikes.

- Scattered gas outages due to flooding, high winds, tornadoes, and fallen trees that may cause broken underground gas lines.

- Large scale outages of electricity [5 to 30 or more days].
- Communication outages - telephone and radio [5 to 30 or more days].

NOAA NWS Definitions

Hurricane Watch

An announcement that hurricane conditions (sustained winds of 74 mph or higher) are possible within the specified coastal area. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the hurricane watch is issued 48 hours in advance of the anticipated onset of tropical-storm-force winds.

Hurricane Warning

An announcement that hurricane conditions (sustained winds of 74 mph or higher) are expected somewhere within the specified coastal area. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the hurricane warning is issued 36 hours in advance of the anticipated onset of tropical-storm-force winds.

Inland Tropical Storm Watch

An announcement that tropical storm conditions (sustained winds of 39 to 73 mph) are possible within the specified interior area within 48 hours.

Inland Tropical Storm Warning

An announcement that tropical storm conditions (sustained winds of 39 to 73 mph) are expected somewhere within the specified interior area within 36 hours.

Inland Hurricane Watch

An announcement that hurricane conditions (sustained winds of 74 mph or higher) are possible within the specified interior area. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the hurricane watch is issued 48 hours in advance of the anticipated onset of tropical-storm-force winds.

Inland Hurricane Warning

An announcement that hurricane conditions (sustained winds of 74 mph or higher) are expected somewhere within the specified interior area. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the hurricane warning is issued 36 hours in advance of the anticipated onset of tropical-storm-force winds.

Hurricane Preparedness

Hurricane season begins on June 1st every year and ends on November 30th. Leading up to this season, PGS operational leadership, in collaboration with the PGS Emergency Coordinator, should be following the necessary preparedness measures for each division, as well as securing necessary hurricane supplies.

For specific procedures to be taken starting May 1st of every year, see [Appendix D: Hurricane Preparedness & Recovery Checklist](#)

For hurricane inventory requirements, see [Appendix D: Hurricane Preparedness Inventory](#)

Hurricane Preparedness Employee FAQ

TECO Peoples Gas is a natural gas utility that is required to respond to emergencies as they occur. Being employed by our Company requires employees to be available on an “as needed basis.”

Team members are expected to report in once a storm has cleared and the winds have dropped below 39 miles per hour.

What does that mean?

If it is a regular workday, you come to work on or before the start of your assigned shift. If your shift starts at 8:00 am, you need to be at work at 8:00 am.

What if it is a weekend?

If you are not scheduled to work, you do not report in. The only exception is the personnel needed to run our operations under emergency conditions. This can impact our Call Center personnel as well as field technicians.

What if the storm passes after my normal work shift?

It will require field technicians and possibly office staff to report immediately. This could be five, six, or seven o'clock in the PM or any time after that.

Managers and/or Supervisors will have a pre-determined work schedule that was copied and distributed to all team members with their assignments. There will be no question as to who will be needed and what their role will be.

All personnel not on duty during the storm will report to their supervisor or designee by telephone. In the event the telephones are not working, employees will report in person to their regular workstations immediately after the storm.

Each Operation Manager shall assess all damage in his or her area. This will be reported to PGS Territory Command.

- Communication Needs
- Employee Needs
- Repairs required
- Customer informational needs

NOTE: PGS Department/Branch Command will decide if the local operations offices will be manned during the storm. Considerations for this decision should include storm hardness of the operations' buildings, storm strength and direction.

Extraordinary Circumstances

Gas Delivery may invoke the "**Extraordinary Circumstances**" provision of FL §556.105 (8)(a) & (b) to be exempt from locate marking requirements. After the emergency, Sunshine One Call will deliver all pending notices to the operating center.

Emergency Locates After Storms

Following a storm, communication should be established between TECO Peoples Gas, electric utilities, and others. All repairs performed by other utilities near PGS natural gas lines should be overseen.

- Schedule 24-hour coverage for One-Call work coordination of emergency locates.
- Assign a locating liaison for direct communication between PGS and other utilities.
- Provide Locators to respond as needed.

5.5 CIVIL UNREST

In the event of civil unrest, the following information will be used as a guide during such events including riots, civil disturbances, or related, hostile, and violent encounters that will result in coordinated action between fire and law enforcement (LE) in accordance with TECO EM/BC plans.

DEFINITIONS

Civil Unrest

Civil Unrest is a broad term used to describe gatherings of people with the intentions of causing public disturbances in violation of the law, usually in reaction to a certain event. This term applies to a variety of events including strikes/demonstrations/protests that have become illegal/dangerous and riots.

These events are often characterized by groups lashing out against law enforcement, the government, property, and/or other citizens. Criminal acts during times of civil unrest may include theft, vandalism, and destruction of property (public and private).

Hot and Cold Zones

During times of civil unrest, areas are categorized as either "hot" or "cold", depending on the level of risk/danger.

- Hot Zone (Exclusion Zone)
 - Unstable, potentially unsafe area designated by law enforcement.
 - Civilians, including PGS team members, will not have access to these areas.
 - When possible, the hot zone will be designated by perimeter streets.
- Cold Zone

- Safe area with little likelihood of civil unrest activity.

NOTIFICATION/INTELLIGENCE

Information related to civil unrest and related threats will be received from communications with local emergency management offices within PGS service areas. TECO corporate security will supplement this information.

Upon receiving notification of possible civil unrest activity, the affected division leaders (designated supervisor/manager based upon emergency assignment) will be made aware of the circumstances and begin identifying possible impacts to PGS infrastructure, as well as high risk areas. The director of operations will assist in this process.

TEAM MEMBER SAFETY AND COMMUNICATION

During civil unrest, it is important to communicate the threat with each team member in affected divisions. If the civil unrest has not yet occurred but is a threat to a PGS division/service area, meetings shall be held prior to communicate details and answer any team member questions.

Team members shall be advised of the following:

- Stay inside and away from doors and windows.
- Stay vigilant and aware of unfolding events in the area.
- If an employee observes or becomes involved in any type of civil disorder, that employee must immediately leave the area and contact law enforcement by calling "911".
 - Once they are able to get to a safe and secure location, they shall contact **TECO Corporate Security via the Central Monitoring Station (CMS), (24/7) at 813-225-5139** if it appears any Emera, TECO Energy or Peoples Gas employees, facilities or assets are in jeopardy.

SECURING PGS DIVISIONS

In the event that a PGS division office or other facility is targeted/impacted by civil unrest, the following preparations should be taken:

- Lock and secure all buildings and storage areas.
 - Interior lighting shall be turned on and left on.
 - Where available, storm shutters shall be closed.
- Move vehicles to an unaffected/secured area.
- Possible use of hired guards (ATO), which will be coordinated through TECO Corporate Security.

SUSPENDING OPERATIONAL ACTIVITIES

Upon receiving notification of civil unrest, all personnel currently within affected service areas shall cease work, suspend operations, and leave the area until the zone is considered "cold".

In the event that a gas-related emergency occurs within a hot zone, PGS will work with emergency responders to control the emergency temporarily until the zone is considered "cold".

Once the area has been cleared, PGS shall utilize established job procedures and emergency plans to respond to any events that may have occurred while the zone was hot.

5.6 TORNADOES

In the event the company receives a report that a tornado has touched down in our service area, all members of the Damage Assessment Team shall be notified. Team members shall remain on "Alert" status until otherwise notified.

Local Operations shall dispatch personnel to the area to determine if any of the company's gas facilities have been damaged and to what extent. They shall report their findings as soon as practical to the Damage Assessment Team. If necessary, a Distribution crew will be dispatched to the area.

If damage is reported, the Damage Assessment Team will respond accordingly based on the type of damage and number of customers impacted.

All such incidents are to be handled though ICS.

Notifications shall be sent to:

- PGS Operations Section Chief
- PGS Incident Commander
- TECO Unified Command

5.7 POWER OUTAGES

Electrical outages can have an adverse impact on our company and the ability of our customers to operate some of their gas appliances.

The company should be prepared to operate under three electrical outage conditions.

Rotating Brownouts

This is an interruption of service for 15 to 45 minutes at various geographical areas of the city.

This disruption of service is preplanned, and the electric utility cycles the power on and off for specified periods of time. These planned brownouts are carried out by the electric utility to avoid overloads at their generation stations. Traditionally, brownouts are experienced in the winter months during severe cold weather. However, it is possible that in the future, due to the large electric growth combined with inadequate generating capacity, brownouts could be experienced in the summer months during extremely hot weather.

Blackouts

Unplanned interruption of service to small or large geographical areas.

Blackouts are usually caused by generation plant malfunction or electrical component failures within the electric distribution system. Blackouts can be brief or extend for an indefinite time period.

Electrical Outages Caused by Natural Disasters

Natural disasters, such as hurricanes or tornadoes, can result in electrical outages. These outages can last for short or extended periods of time.

The following are items of concern to our company and customers during an electrical outage:

No Electrical Power to Our Office or Operational Facilities

Emergency standby generators are automatically tested weekly. All telephone communication battery backup systems shall be checked periodically and kept ready and in operation condition at all times.

Standby generators located in the operations center and facilities shall be the responsibility of the Local Operations center or facility where they are located.

No Electric Power to Our Gate Stations

Local Operations shall dispatch personnel to any gate station that has lost power and/or the ability to communicate. Personnel are to report findings to Operations Manager after inspection.

Cold Weather Electrical Power Interruptions

During cold weather, if an area where power was curtailed has a large concentration of gas furnace along with other gas appliances [i.e., water heaters, dryer, etc.], when the power is restored, all gas appliances will come on at once, if they were on before the power outage. In rare cases, this could cause an unusually large draw on our natural gas distribution system, resulting in the lowering of gas pressures to the outermost parts of our distribution system. This should be considered during extremely cold weather periods when the electric utility is in their preplanned rotation brownouts phase. Gas Delivery should be prepared for any outages caused by electrical power interruption.

Communications with the local electric utility may be beneficial to both utilities.

Curtailed areas with high concentrations of gas heating would not benefit the electrical utilities as much as curtailment of areas that have high concentrations of electric heating.

5.8 COMMUNICATIONS OUTAGES

Telephone Communications

Our company is dependent on telephone communication. Most departments have computerized information systems that depend on maintaining communication with Tampa. A disruption in telephone communications can have an adverse impact on operations. Several areas of concern and proposed recovery procedures are covered in this section.

Field Equipment

- Two-way Radios
- Cell Phones / Prepaid Wireless Phones

- Laptop computer with wireless card
- Satellite phones (See [Appendix B](#): Satellite Phone Operating Instructions)

Worst Case Scenarios if Telephone Communications are Interrupted

- No communications from/to customers.
- No communications between Territory and Local Operations
- No communications from Territory to Corporate Office.
- No communication from Territory/Local Operations to Gate Stations or major industrial accounts.
- No CIS communications from Corporate Office to Operation office.
- No computer communication from Corporate Office to our Gate Stations or major industrial accounts.
- Loss of some or all system pressures telemetering.

Areas/Systems Affected if Telephone Service is Interrupted

- Customer Contact Center CIS system
- Utility Technicians Service Order System (SORTS) or PragmaCad
- Walker System [warehouse controls]
- Gas Measurement and Control between System and Division and between Territory/Local Operations and Gate Stations
- Meter Reading (MVRS) computer programs
- Cashiering Processing System
- Leak Management System
- Irthnet

Emergency Telephone Communication Recovery Procedures

- Operations locations that have natural or propane powered standby electric generators will use generators [in conjunction with the telephone equipment battery backup systems] to provide emergency power to selected lighting, telephone, and computer equipment in case of a power outage.
- In the event of a hurricane, it is assumed that due to the geographical location of our main offices that these areas will be one of the first to have their power and telephone service restored. It would also be unusual for all locations to be without power for extended periods of time.
- Each Division shall determine their central operations center.
- Push to talk radios/phones will be used to communicate with company personnel, outside emergency services, and the news media during periods of times where our normal telephone service is disrupted.
- Field personnel using two-way radio/phones will update the Operational office during emergencies.
- A list of all radio/phone users and their phone numbers will be maintained and updated periodically.
- Radios/phones may be redistributed/reassigned to ensure adequate coverage.
- The telephone link between Corporate Headquarters and our central computer located in Tampa are critical in providing service to our customers.

- During the hurricane season, an updated Hurricane Report shall be kept on file. This report will be updated by June 1 each year. In the event computer communications is lost with the Corporate office, service requests can be taken and orders hand processed. Service orders shall be hand delivered to the Local Operations.
- After communications are restored with Corporate Headquarters, all customer records impacted during the loss of communications will be updated.

Cyber Communication (Internet)

In the event of a loss of cyber communications (non-storm) affecting internet and smart phone devices and access, all team members are to report to their normal areas of operation for more information. Team members with instructions for reporting to other critical areas as a result of potential cyber threat or loss, should report to those pre-determined areas.

SECTION 6 – COMMUNICATIONS

This section establishes the procedures to follow prior, during, and after an emergency to communicate within the Territory and with the news media, customers, general public, and regulatory agencies.

6.1 EMERGENCY NOTIFICATION FLOW CHART

In an emergency, PGS personnel will utilize a notification flow chart to ensure that proper parties have been made aware of an emergency, if it is relevant to them. The level of notification will depend upon the severity and type of emergency. Other parties may be notified outside of the flowchart, but this diagram serves as a guiding tool.

See [Appendix D](#): Emergency Notification Flowchart

6.2 INFORMATION RELEASES TO THE PUBLIC – PRE-STORM/THREAT

Corporate Communications (Corp Comm) will release information about emergencies to customers and the general public, at scheduled intervals and as needed, by means of:

- Bill stuffers
- Customer information handbooks
- Neighborhood newspapers
- News media - radio, print and television
- [PeoplesGas.com](#)
- Social media (e.g., Facebook, Twitter, etc.)

Contact Media Relations at (813) 228-4945 for more information.

Additional information may be released by PGS Community Liaisons and/or operations at:

- Chamber of Commerce and special interest group meetings
- County Emergency Operation Centers

Information Provided to the General Public and the News Media

Prior to a storm/suspected event, PGS will work in correlation with Corp Comm to provide valuable information to the general public and the news media. Some information may include:

- PGS Gas Delivery has an emergency plan and is prepared to handle emergencies.
- Suggested customer actions for storm preparation.
- PGS gas emergency phone numbers.
- Corporate Communications Media Relations contact person and phone numbers.

Corp Comm will release information of general interest to our customers and the general public, such as:

- Gas Delivery personnel or contractors carry proper identification badges, uniforms, and company vehicles.
- In cases of gas outages due to damaged lines, the company's primary responsibility is to make the affected area safe. Make safe includes making the necessary repairs to the damaged gas line[s], turning off, locking and tagging all affected gas services, and purging the gas lines after they have been repaired.
- After the make-safe has been completed, our next priority is to restore service to the affected customers as soon as practical.
- Under no circumstances should a customer attempt to self-restore gas service.
- Gas Delivery personnel must have access to the gas meter and the customer's appliances to be able to restore gas service.
- Customers should refrain from calling the company during emergencies unless they smell gas, or when gas company crews have restored gas service in their area, and they continue to not have gas service.
- Customers with top priority include hospitals, emergency services, nursing homes, and schools. Residential customers with special circumstances or situations should advise our Customer Contact Center Department accordingly.
- Customers should turn off all appliance valves if gas service is interrupted.
- In cases of electrical brownouts, customers should adjust heating and cooling thermostats to turn off their gas equipment. When electricity is restored, gas equipment thermostats should be turned back on after the electrical power supply has stabilized.

6.2 COMMUNICATION UPDATES – DURING EMERGENCY RESPONSE

When an emergency occurs, it will be the responsibility of the Incident Commander, (or designee) to:

- Inform/update TECO Corporate Communications (Corp Comm) so they can inform the media of the emergency and restoration plans as needed.
- Gather information and work with TECO Media Relations and Corp Comm to agree on core or key message(s) early in the incident.
- Determine if onsite Media Relations is necessary.
- Prepare a company statement with TECO Media Relations for all company personnel.
- Update Corp Comm with pertinent information to be released (e.g., customer outage information) to update the public of the steps being taken to restore service or correct the situation affecting customers or members of the general public.
- Approve all press releases from Corp Comm affecting the service area.

- Maintain communication with the Damage Assessment Team working the emergency to stay up to date of all developments.
- Verify that the Safety Officers, or designee, has notified the PSC when required. [See [Appendix D: FPSC Reporting Requirements & Contact Information](#)].
- Instruct the Human Resources Section to post Employee Hotline information.
- With Human Resources, determine if the emergency has created any employee needs and arrange to address those needs.

6.3 EXTERNAL COMMUNICATIONS – EMERGENCIES (NON-STORM)

When a gas outage or emergency occurs, the following communications are required.

Work Coordinator/Dispatcher Communications

- Contact the appropriate police department, fire departments, and local municipality.
- Advise them of the outage or emergency and that we will have company personnel working in the area.
- Advise them of the type of ID personnel are carrying [i.e., company badges, specially marked clothing].

Field Personnel Communications

Upon arriving at a customer's home or place of business, field personnel shall:

- Identify self.
- Briefly explain to the customer what has happened and what needs to be done.
- Before departing, inform the customer of what was done. If a return visit will be necessary, inform the customer of the approximate time of the return visit.
- Only repeat the Company statement when approached by customers and/or the media.
- Refer all requests for additional information to the TECO Media Relations (or designee) as needed.

6.4 INTERNAL COMMUNICATIONS

The field operation center shall keep the work coordinator informed of the situation in the field.

The work coordinator will act as a liaison between the field and office personnel.

Corporate Communications will update company personnel with internal communications.

Communications by Division Supervisors

The Local Operations Manager (or designee's) must:

- Inform the Customer Contact Center Manager and Supervisor(s) of:
 - The number of affected customers.
 - The estimated time of completion.
 - Form of ID being used by field personnel [badge and/or specially marked clothing].
 - Affected area.
 - Any unusual circumstances.

- Inform any manager whose employees are assisting in the field of:
 - Estimated completion time of assignments.
 - Any changes in personnel requirements.
 - Situation updates.
- Provide the Field Operation Center information about customers with special circumstances or needs.

Communications by Task Force Leader[s]

A leader will head each task force working in the field. The leader will inform the task force[s] of the following:

- New assignments and/or changes to assignments.
- End of assignment and quitting and starting times.
- The company's prepared statement.
- Safety related information.
- Unusual circumstances.
- Any personal messages for employees.

In addition, the task force leader will:

- Aid field personnel when necessary.
- Answer field personnel questions about procedures and/or assignments.

Some of this information, including safety related details, as well as a required of operator qualifications will be provided in an orientation for the task forces.

See [Appendix A](#): Task Forces for specific information to be included in this orientation.

SECTION 7 – MOBILIZATION PROCEDURES

Timely and pre-planned mobilization of personnel, materials and supplies are an important part of any emergency preparedness plan. Swift mobilization can make the difference between an emergency situation becoming intensified or being controlled in a short period of time.

In many emergency situations, only a small number of people are needed, and can be notified through normal telephone communication.

There will be times when telephone communications will be disrupted, and our employees will require advance notice as to which workstation they should report to.

7.1 MOBILIZATION OF PERSONNEL

Depending on the emergency situation and the number of hours employees may be expected to work, the following items shall be reviewed:

- If applicable, employees shall stop for meal prior to reporting to workstations.
- Advance warning as to how many hours the employee may be expected to work shall be given.

- All personnel shall be notified that no customer turn-off or turn-on activity will take place until a Field Operation Center has been established and proper paperwork is available to document any work performed.

7.2 REQUIREMENTS FOR OUT-OF-TOWN PERSONNEL

Hotel accommodations for estimated number of personnel shall be made using estimated arrival and departure dates of employees or outside service personnel.

Out-of-town personnel shall be notified of the following:

- Estimated time frame personnel will be required.
- Personnel qualification requirements.
- Tools and materials they should bring.
- Required finances they should bring.

7.3 FIELD OPERATION CENTER AND WORK REPORTING STATIONS

A Field Operations Center shall be established and staffed as soon as practical following any incident or emergency.

External support personnel should be checked in at the beginning of service and checked out prior to being released from support. The *Gas Ops External Support Personnel Tracking Sheet* can be used to log external personnel's contact information, identification, dates of service and job type being performed while in service. [See [Appendix D: Gas Ops External Support Personnel Tracking Sheet.](#)]

SECTION 8 – DEMOBILIZATION PROCEDURES / AFTER EMERGENCY REVIEW

Similar to mobilization, demobilization is especially important during emergency situations as well. Demobilization refers to the orderly, safe, and efficient return of an incident resource, including personnel, back to its original location and status. Demobilization should begin being planned as soon as an incident occurs.

8.1 DEMOBILIZATION

During demobilization, the entire ICS structure will coordinate to:

- Remove all emergency supplies and materials from Field Operations Center and store in Warehouse and other storage areas.
- Clean up Field Operations Center Area.
- All locks [painted "Day-Glow" green] used in the make safe process shall be returned to the field command post or Local Operations Center after service has been restored.
- Materials and supplies used from the footlocker shall be replaced.
- All related paperwork shall be submitted to the Customer Contact Center Office for processing no later than the next day after the work is completed.

8.2 AFTER EMERGENCY REVIEW

Following an incident, all personnel should reflect on the five mission areas of ICS (Prevention, Protection, Mitigation, Response, and Recovery) and relate these mission areas to the specific incident and the company's efforts.

Some guiding questions to ask could include:

- Was everyone involved aware of his or her duties and responsibilities?
- Did each department perform its assigned tasks?
- Were materials and supplies available as specified by the plan?
- Were appropriate personnel notified of the emergency and kept up to date in a timely manner?
- Did communication flow, as specified by the plan?
- Did execution of the plan result in better utilization of personnel and material resources?
- Did execution of the plan facilitate the resolution of the emergency?
- Was the company and/or specific departments under prepared in any ways?

Using these questions and thinking about what can be done better in the future, all personnel with any areas of improvement, concerns, or lessons learned should send a list of these remarks to the PGS Emergency Coordinator.

Utilizing this information, the PGS Emergency Coordinator will develop an After-Action Review and Improvement Plan to ensure that the emergency preparedness plan is effective and being adhered to. The After-Action Review and Improvement Plan also serves as a tool for PGS moving forward to guide trainings, improve our emergency efforts, and become more resilient to these incidents in the future.

SECTION 9 – EMERGENCY PREPAREDNESS PLAN REVIEW

9.1 ANNUAL REVIEW

The PGS Emergency Preparedness plan should be reviewed annually and updated as needed prior to June 1st every year. This review should be completed by the PGS Emergency Coordinator, in correlation with the Director of Operations, Division Managers, and supporting staff. Certain areas of the plan may require annual updating, due to the information being changed frequently, but other areas of the plan should be updated on an as needed basis.

The following areas should be reviewed for validity and updated accordingly every year:

- All external and internal emergency telephone numbers included in this plan.
- Personnel contact lists.
- Changes/additions to procedures.

Outside of this plan, other PGS emergency management documents will be reviewed and updated before June 1st every year, alongside the Emergency Preparedness Plan.

Some of these documents include:

- Key PGS Emergency Personnel

- PGS/TPI Team Member Contact Information
- Hurricane Preparedness & Recovery Checklist
- Hurricane Preparedness Inventory
- Outage Resources Inventory
- Contact information for regulatory/government agencies
- Team member emergency assignments

SECTION 10 – YEAR-ROUND PREPAREDNESS

Emergency preparedness is a year-long commitment. PGS aims to consistently improve the company and its employees' preparedness, ability to respond to adverse incidents, and resilience in emergency situations. To achieve this goal, the following programs and measures have been implemented year-round:

10.1 EMERGENCY ASSIGNMENTS

To better prepare for and respond to incidents, each PGS team member will be assigned a specific emergency assignment, based upon the ICS structure. It is important that all team members are aware of their emergency assignment and how their role plays a part in emergencies.

These assignments are available for review in the "EM Assignments" section of the Emergency Management Website, which is accessed from MyTECOnet. If you experience trouble accessing this information, ask your supervisor/manager or contact the PGS Emergency Coordinator.

These assignments will be updated annually before June 1st. Any significant changes will be communicated out to PGS team members.

10.2 EXERCISES AND TRAININGS

PGS utilizes the Homeland Security Exercise and Evaluation Program (HSEEP) created by the Department of Homeland Security (DHS) to organize multiple trainings and exercises throughout each year. HSEEP provides a set of guiding principles for developing exercises rooted in ICS.

These trainings/exercises allow PGS to test and validate plans and capabilities and identify both capability gaps and areas for improvement. During these trainings/exercises, team members will become more familiar with their roles in emergency scenarios and participate in meaningful interactions and discussions.

10.3 GET READY!

It is important for PGS team members to be just as prepared for emergencies outside of work as they are while at work. Get Ready! presentations will be given to each division to assist employees in preparing themselves and their families for adverse incidents. These presentations may feature information such as creating a family plan, creating a preparedness kit, and becoming aware of any specific circumstances that may apply to certain team members, such as evacuation and flood zones.

APPENDIX A: TASK FORCES

A.1 SAFETY ORIENTATIONS

Safety gear

- 100% cotton clothing (or NFPA 2112 FR)
- Hard hat (ANSI Z89.1)
- DOT safety vest (Class 2)
- Safety toe shoes/boots (ANSI Z41.1)
- Safety eyewear (ANSI Z87.1)
- Gloves
- Lights

Identify Yourself

- Introduce self to customer
- Wear badge

Driving

- Unfamiliar with areas
- Make a U-turn or drive around the block – don't back unnecessarily
- Parking
- Right side of road
- Not next to hazards or objects if possible

Dark conditions/Working until 9:00 PM

- Ground conditions
- Trip/fall hazards
- Make sure you have lighting available
- Spare batteries
- Turn off when not in use

Power Lines

- Consider all power lines "hot"
- Beware of downed lines hidden by debris, trees, bushes, or brush
- Insects in bushes
- Snakes, etc.

Insects, animals, reptiles

- Dogs – Customer owned or stray
- Insects around meter sets and in bushes – wear repellent
- Be on the lookout for displaced animals, snakes, etc.
- Seek quick medical attention if needed

Heat

- Wear sunscreen and breathable hat
- Drink hydrating fluids often
- Don't work to exhaustion

Irate customers

- Anticipate that customers without service will be upset
- Be cautious
- Take measures to avoid conflict
- STAY safe

Fatigue

- Pace yourself
- Take frequent breaks

Follow-up

- Report any dangerous situations
- Somebody else may not be aware

Incident Reporting

- Report work-related injuries, collisions or damages, regardless of severity, to your Supervisor (or if unavailable, Safety Department). Report as soon as possible but no later than the end of the workday.
- Nurse Triage options for PGS

A.2: OQ REVIEW & ORIENTATION FOR TASK FORCES

Mutual Assistance OQ team will:

- Verify mutual assistance company plan meets PGS PQP requirements or equivalent
- Create an OQ task list by function, such as:
- Repair to damaged distribution system
- Repair damaged service line
- Repair damaged riser, meter and regulator
- Clear plugged service line (water)
- Replace excess flow valve
- Replace meter, regulator
- Inspect regulator and gate stations
- Restore of service (meter turn on)
- Leak survey, Outside, inside leak investigation, leak
- Verify current qualifications for task to be performed should be reviewed before sent to field
- Perform on boarding review of job procedures and standards

Typical job procedures to be reviewed:

- JP 01-012 Turn-Off Procedure for Metered Service
- JP 01-001 Turn-On
- JP 01-005 Dial Test
- JP 10-004 Use of Continuity Strap

Guidelines for Mutual Assistance contractors:

- Stay focused on restoration
- Do not respond to leak calls, if found and can make safe by turning valve make safe. Contact PGS do not leave site until released by PGS
- Do not work on regulator stations or gate station regulators unless authorized by PGS
- When assigned main or service line repair work, additional validation of qualifications will be required.

APPENDIX B: SATELLITE PHONE OPERATING INSTRUCTIONS

Pre-Use Checklist

- Account for all satellite charges (i.e., wall, vehicle, etc.).
- Charge phone (and spare battery) and test for operability prior to May 31.
- Ensure phone batteries are charged and ready 72 hours prior to storm landfall.

General Operating Instructions

The mobile satellite phone is a “line of sight” device and will not work inside buildings. You must be outside and have direct line of sight to an orbiting satellite. Make sure that you are away from tall buildings and in a clear area. Extend the antenna fully and point it toward the sky. (Rotate antenna and pull out extension.) Make sure that the antenna is locked in place or the reception will be poor.

1. Power on phone by pressing button with red circle (bottom left of phone) down for 2 seconds.
2. If prompted, enter a pin number, either 1111 (default), then press “ok”. The phone will then register with the network and you will see the following on the display: “Iridium” in big letters in the center; a signal strength indicator in the upper left corner; a battery strength indicator in the upper right corner; a small house and a small world at the bottom. (If the phone does not register with the network, press the up-arrow key at the bottom right corner and then press the “8” key. This will re-start the registration process.)

Calls from Satellite Phone to Land Line or Cell Phone:

- Press 00 then 1 then the area code and the number you are calling. (ex. 0018132281111) Then press the “ok” button. The display will then change to “calling” and the number you are trying to reach will be displayed. (Connection may take 30-60 seconds) Press the “ok” key to end the call.

Calls to Satellite Phone from Land Line or Cell Phone: (connection time may take 30-60 sec.)

- From the TECO network: Press 9011 then enter the 12-digit satellite phone number you are calling. [ex. 9011ABCDEFGHIJKL]
- From a normal phone line: Press 011 then enter the 12-digit satellite phone number you are calling. [ex. 011ABCDEFGHIJKL]
- If the phone you are calling from will not access the 881 country code, you can get to the satellite phone through a two-step process. This process however is more expensive for both the calling party and the satellite phone user.
 - Dial 1-480-768-2500 (you must first dial a “9” if you are inside the TEC phone network). When prompted, enter the 12-digit satellite phone number [ex. ABCDEFGHIJKL]

Calls from Satellite Phone to Satellite Phone: (connection time may take 30-60 seconds)

- Press 00 then enter the 12-digit satellite phone number you are calling. [ex. 00ABCDEFGHIJKL]

Special Notes About Teleconferencing from a Satellite Phone:

- If using the TECO teleconferencing unit with satellite phones, there will be around a 30-60 second latency. Due to this latency, it will be necessary to have a moderator manage these calls. This can be done simply by using simple radio techniques like indicating “over” when you are through talking. If the call has a moderator on the conference bridge itself, each caller’s participation may be managed using the bridge itself.
- For instructions on using the conferencing bridge – see <http://plza-1confb/help/userguide.pdf> Instructions for managing a call with your phone or using the audio console start on page 1 Appendix C: List of used Acronyms/Abbreviations

APPENDIX C: ACRONYMS/ABBREVIATIONS

Acronym/Abbreviation	Term
PGS	Peoples Gas
ICS	Incident Command System
DHS	Department of Homeland Security
HSEEP	Homeland Security Exercise and Evaluation Program
IAP	Incident Action plan
LSU	Logistics Support Unit
PIO	Public Information Officer
SO	Safety Officer
LNO	Liaison Officer
GIS	Geographic Information Systems
TPI	TECO Partners
HR	Human Resources
Ops	Operations
VP	Vice President
Corp Comm	Corporate Communications
CCC	Customer Contact Center
ATO	Anti-Terrorism Officer
SORTS	Service Order System
LMS	Leak Management System
IT	Information Technology
FPSC	Federal Public Service Commission
DOT	Department of Transportation
OQ	Operation Qualification

Acronym/Abbreviation	Term
JP	Job Procedure

APPENDIX D: PLAN REFERENCE DOCUMENTS

(Available for download through the TECO Emergency Management Website. Select "TECO Commands" then "Peoples Gas" for materials.)

Contact/Notification Information

1. [Key PGS Emergency Contacts](#)
2. [PGS Team Member Contact Information](#)
3. [Emergency Notification Flowchart](#)
4. [FPSC Reporting and Contact Information](#)
5. [NOAA FL Government Contact and Monitoring Information](#)

Checklists & Inventory Lists

1. [Hurricane Preparedness & Recovery Checklist](#)
2. [Hurricane Preparedness Inventory](#)
3. [Outage Resources Inventory](#)

ICS Specific Information

1. [Official FEMA ICS Forms w/ Descriptions](#)
2. [ICS Section and Role Descriptions](#)
3. [Generic Incident Base Set-Up Plan](#)

PGS/TECO Specific Response Reference

1. [Gas Ops Company Command Roster](#)
2. [All Company Command Roster](#)
3. [PGS ICS Emergency Assignments](#)
4. [Gas Delivery Storm Communication Dashboard](#)
5. [Hotline Message Sample](#)
6. [TECO Re-Entry Letter](#)
7. [TECO Unified Command](#)

Gas System Information

1. [Gas Supplied Hospitals, Schools, HC Facilities, etc.](#)
2. [Interruptible Customer Curtailment Categories](#)

Mutual Assistance/Outside Support

1. [Mutual Assistance Brochure](#)
2. [SGA Mutual Assistance Guidelines](#)
3. [AGA Mutual Assistance Agreement](#)
4. [Regulated Gas Companies in FL](#)

Other Important References

1. [Operations' Response Guidelines for Natural Gas Leaks on Another Company's System](#)