ELECTRONIC FILING

Trisha Osborne, Assistant Commission Secretary
PUBLIC UTILITIES COMMISSION OF NEVADA
1150 E. William Street
Carson City, NV 89701

Re: DOCKET NO. 20-02031; JOINT APPLICATION OF NEVADA POWER COMPANY d/b/a NV ENERGY AND SIERRA PACIFIC POWER COMPANY d/b/a NV ENERGY FOR APPROVAL OF THEIR JOINT NATURAL DISASTER PROTECTION PLAN

Dear Ms. Osborne:

Accompanying this letter, for electronic filing with the Public Utilities Commission of Nevada, is a partial party Stipulation between Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy, Regulatory Operations Staff of the Public Utilities Commission of Nevada, CTIA – The Wireless Association®, and the Nevada Telecommunications Association, in the above referenced Docket. Should you have any questions, or require additional information, please advise.

Sincerely,

Katherine Hoffman

KHOF/dlw
BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their Joint Natural Disaster Protection Plan. Docket No. 20-02031

STIPULATION

Pursuant to Section 703.845 of the Nevada Administrative Code ("NAC"), Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and together with Nevada Power, "NV Energy"), the Regulatory Operations Staff of the Public Utilities Commission of Nevada ("Staff"), CTIA – The Wireless Association® ("CTIA"), and the Nevada Telecommunications Association ("NTA"), each individually a "Party" and together the "Parties," enter this Stipulation to resolve a portion of the Companies’ Joint Natural Disaster Protection Plan (the "NDPP"). Specifically in portions of the NDPP related to the "communication plan specific to . . . communication infrastructure providers," as required by Section 7.2(g) of LCB File No. R085-19 (the "CIP Communication Plan"). The foregoing Parties in the above-captioned docket, by and through their undersigned representatives, submit this Stipulation for the review and approval of the Public Utilities Commission of Nevada ("Commission").

SUMMARY OF THE STIPULATION

The Parties agree that this Stipulation provides a reasonable resolution of the issues related to the CIP Communication Plan and that the Stipulation is in the public interest. The Stipulation only settles issues related to the CIP Communication Plan, and only seeks relief the Commission is entitled to grant. Accordingly, the Parties recommend that the Commission accept the Stipulation, modify the NDPP as set forth in this Stipulation, and grant certain requests for relief made by the Companies in their NDPP.

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RECITALS

1. During the 2019 Legislative Session, the Nevada Legislature enacted Senate Bill 329 (“SB 329”), which requires that NV Energy prepare and file with the Commission a triennial NDPP.

2. SB 329’s NDPP requirement, now codified as Section 704.7983 of the Nevada Revised Statutes (“NRS”), mandates that an NDPP must include “protocols for de-energizing distribution lines and disabling reclosers on those lines in the event of a fire or other natural disaster.”

3. Recognizing that de-energizing distribution lines can affect the availability of critical communication services, NRS § 704.7983(2)(e) further requires that such de-energization protocols “must consider the associated impact of such actions on public safety and mitigate any adverse impact on public safety plans, including, without limitation, impact on critical first responders and on health and communication infrastructure.”

4. NRS § 704.7983(4) provides that the Commission must “adopt regulations to provide for the method and schedule for preparing, submitting, reviewing and approving” a NDPP.

5. In compliance with NRS § 704.7983(4), the Commission opened Docket No. 19-06009, entitled “an investigation and rulemaking to amend, adopt, and/or repeal regulations in accordance with Senate Bill 329 (2019)” (the “NDPP Rulemaking Docket”).

6. Each of the Parties participated in the NDPP Rulemaking Docket and filed comments.

7. The comments filed by CTIA, the NTA, and their members in the NDPP Rulemaking Docket detail the essential role of communication services during natural disasters, and the potential impacts of Public Safety Outage Management (“PSOM”) events on communication infrastructure.

8. These comments also discuss reasonable and prudent protocols, including providing communication infrastructure providers adequate advance notice of PSOM events along with granular and actionable details about the affected area.
9. During the pendency of the NDPP Rulemaking Docket, and as part of developing its NDPP, NV Energy hosted a number of meetings with stakeholders, including communication infrastructure providers, to discuss its upcoming NDPP and best practices for planning and implementing PSOM events.

10. Stakeholder meetings to explore synergies and incorporate stakeholder input in the NDPP were conducted in person in Las Vegas, Reno, and Elko, and were supplemented with remote participation capability, on January 7, 13, 21, and 28, 2020. This was followed by community sessions for public on January 27, January 29, February 3, February 4 and February 6, 2020 in several locations throughout NV Energy’s service territory in Lake Tahoe, Reno, Las Vegas and Mt. Charleston areas. NV Energy conducted a Facebook Live session for remote participation on February 4, 2020. NV Energy also met with the Southern Nevada Operating Group on December 12, 2019; the Clark County Emergency Manager on December 17, 2019; the Northern Nevada Emergency Managers on January 3, 2020; the Northern Nevada Fire Chiefs on January 8, 2020.

11. In addition to conducting meetings with stakeholders, NV Energy also worked directly with several communication infrastructure providers to share mapping information identifying NV Energy’s proactive de-energization zones (“PDZ”).

12. During these stakeholder meetings and conversations with communication infrastructure providers, NV Energy expressed its commitment to maintaining an open dialogue with communication infrastructure providers and working with these providers to provide information on the impact of PSOM events on communication facilities.

13. On January 30, 2020, the Commission adopted permanent regulations governing the development, submission, and approval of NDPPs (“the NDPP Regulations”).

14. Section 7.2(g) of the NDPP Regulations requires that NV Energy’s NDPP contain “a communication plan related to public safety outage management,” which must include a CIP Communication Plan.

15. Section 7.2(g) of the NDPP Regulations further provides that in developing the CIP Communication Plan, NV Energy must “meet with communication infrastructure providers
in an effort to develop a mutually agreeable plan for public safety outage management notification protocols and format.”

16. Section 8.2 of the NDPP Regulations authorizes the Commission to approve or modify the NDPP.

17. On February 8, 2020, NV Energy filed its Joint Application requesting Commission approval of the NDPP, which has been designated Docket No. 20-02031.

18. Section 5.7 of the NDPP details NV Energy’s plan for PSOM public safety and outreach, which addresses its marketing and external stakeholder outreach efforts for PSOM events, including its CIP Communication Plan.

19. Pursuant to NRS §§ 703.301 and 228.360, Staff and the BCP participate in these proceedings as a matter of right.

20. On March 25, 2020, CTIA and the NTA each filed a petition for leave to intervene (“PLTI”) in Docket No. 20-02031.

21. On April 2, 2020, the Presiding Officer held a prehearing conference at which the Parties discussed the PLTIs, procedural schedule and discovery procedures.

22. On April 7, 2020, the Presiding Officer issued Procedural Order No. 1 (corrected), which consolidates Docket Nos. 20-02031 and 20-02032 for hearing purposes and establishes a procedural schedule for the consolidated dockets.

23. On April 8, 2020, the Presiding Officer issued an order granting the PTLIs for CTIA and the NTA.

24. The Parties have investigated and analyzed the CIP Communication Plan contained in Section 5.7 of the NDPP.

25. On May 7 and 21, 2020, NV Energy, CTIA, and the NTA participated in a detailed discussion about the CIP Communication Plan and how early notification and periodic updates of a PSOM event would allow communication infrastructure providers to better prepare.

26. During this discussion, NV Energy, CTIA and the NTA expressed their commitment to maintaining and enhancing the collaborative process between NV Energy and communication infrastructure providers.
27. Following this cooperative discussion, NV Energy, CTIA, and the NTA determined that certain modifications to the CIP Communication Plan would strengthen this collaborative process and allow communication infrastructure providers to better prepare for “any adverse impact on . . . communication infrastructure,” as required by NRS § 704.7983(2)(e).


29. At the time of filing this Stipulation, BCP has not taken a position on the Amended CIP Communication Plan or this Stipulation.

NOW, THEREFORE, the Parties agree and stipulate as follows:

A. Amended CIP Communication Plan

1. In any Commission order approving or modifying the NDPP pursuant to Section 8.2 of the NDPP Regulations, the Commission should modify the NDPP to incorporate the amended CIP Communication Plan as shown in Exhibit 1 to this Stipulation (the “Amended CIP Communication Plan”).

2. Specifically, the Amended CIP Communication Plan makes the following important enhancements to the NDPP:

   i. Defines “Communication Infrastructure Provider” to include “any company that provides Broadband Internet Access Service (BIAS), Personal Communications Service (“PCS”), local exchange service, or Voice over Internet Protocol service, or is a Telephone Company. As used herein, BIAS shall include mass-market services meeting the definition found at 47 C.F.R. § 8(1)(b); mobile service shall include mass-market services meeting the definition of Personal Communications Services (PCS) found at 47 C.F.R. § 24.5; VoIP shall include mass-market services meeting the definition found at NRS 704.685(3)(b); and Telephone Company shall have the definition found at NAC 704.008835.”

   ii. Provides that Communication Infrastructure Providers wanting to receive notice pursuant to the CIP Communication Plan are responsible for submitting their relevant contact information to the contact provided by NV Energy.
iii. Clarifies that NV Energy will share with Communication Infrastructure Providers shapefile maps for each PDZ in advance of each fire season and will provide new shapefile maps following the completion of any system upgrades, including upgrades that allow NV Energy to de-energize below the substation level.

iv. Outlines the ongoing collaborative process between NV Energy and Communication Infrastructure Providers with respect to identifying communication facilities that may be impacted by a PSOM event. This process includes NV Energy sharing with Communication Infrastructure Providers a spreadsheet containing the provider’s respective meter number, facility or service address, latitude and longitude, and specific PDZ, based on the legal entity names provided by the Communication Infrastructure Provider to NV Energy. NV Energy has confirmed that it will keep confidential the locational information and other data related to communication infrastructure facilities; NV Energy will not share or otherwise disseminate this customer specific information to any other parties, persons, or entities.

v. Provides that NV Energy will give Communication Infrastructure Providers notice of an upcoming PSOM event (a “PSOM Notice”) at the following intervals:

- 8 days prior to a PSOM event
- 3.5 days prior to a PSOM event
- 48 hours prior to a PSOM event
- 24 hours prior to a PSOM event
- 2 hours prior to a PSOM event
- 1 hour prior to a PSOM event
- At the time of de-energization
- During the PSOM event
- At the time of re-energization
- Immediately upon cancellation of a PSOM event

vi. Specifies that each PSOM Notice will include emails as well as a non-autogenerated telephone call to the Communication Infrastructure Provider from NV Energy.

vii. Obligates NV Energy to share with Communication Infrastructure Providers the estimated time of re-energization which the Communications Infrastructure Providers understand may change.
viii. The Amended CIP Communication Plan is prepared such that Section 5.7 of the NDPP will continue to remain applicable to all other customer segments.

B. Provisions of General Applicability

1. This Stipulation shall not serve as precedent for the resolution of any issue in the future by the Commission, with the exception of the matters enumerated herein and the findings that follow.

2. In accordance with NAC § 703.845, this Stipulation settles only issues relating to the present proceeding and seeks relief that the Commission is empowered to grant.

3. This Stipulation is entered into for the purpose of resolving all the issues in the CIP Communication Plan by and among the Parties as set forth above. This Stipulation is made upon the express understanding that it constitutes a negotiated settlement. The provisions of this Stipulation are not severable.

4. This Stipulation represents a compromise of the positions of the Parties. As such, conduct, statements and documents disclosed in the negotiation of this stipulation shall not be admissible as evidence in this Docket or any other proceeding. Except as set forth herein, neither this Stipulation, nor its terms, nor the Commission’s acceptance or rejection of the terms contained in this Stipulation shall have any precedential effect in future proceedings.

5. This Stipulation may be executed in one or more counterparts, all of which together shall constitute the original executed document. This Stipulation may be executed by Signatories by electronic transmission, which signatures shall be as binding and effective as original signatures.

This Stipulation is entered into by each Parties as of the date entered below.

REGULATORY OPERATIONS STAFF

By: [Signature]
David Noble
Assistant Staff Counsel

Dated: 05/28/20
REGULATORY OPERATIONS STAFF

By: ____________________________
   David Noble
   Assistant Staff Counsel

Dated: ____________________________

SIERRA PACIFIC POWER COMPANY, D/B/A NV ENERGY
NEVADA POWER COMPANY, D/B/A NV ENERGY

By: ____________________________
   Justina Caviglia
   Senior Attorney

Dated: 5/28/2020

CTIA – THE WIRELESS ASSOCIATION

By: ____________________________
   Katherine Hoffman
   Counsel for CTIA

Dated: ____________________________

NEVADA TELECOMMUNICATIONS
ASSOCIATION

By: ____________________________
   Michael Eifert
   Executive Director

Dated: ____________________________
SIERRA PACIFIC POWER COMPANY, D/B/A NV ENERGY
NEVADA POWER COMPANY, D/B/A NV ENERGY

By: ________________________________  Dated: ________________________________
    Justina Caviglia
    Senior Attorney

CTIA – THE WIRELESS ASSOCIATION

By: ________________________________  Dated: May 28, 2020
    Katherine Hoffman
    Counsel for CTIA

NEVADA TELECOMMUNICATIONS
ASSOCIATION

By: ________________________________  Dated: ________________________________
    Michael Eifert
    Executive Director
SIERRA PACIFIC POWER COMPANY, D/B/A NV ENERGY
NEVADA POWER COMPANY, D/B/A NV ENERGY

By: ____________________________  Dated: ________________
    Justina Caviglia
    Senior Attorney

CTIA – THE WIRELESS ASSOCIATION

By: ____________________________  Dated: ________________
    Katherine Hoffman
    Counsel for CTIA

NEVADA TELECOMMUNICATIONS ASSOCIATION

By: ____________________________  Dated: 5/28/2020
    Michael Eifert
    Executive Director
5.7 Public Outreach & Safety

The Companies will continue to work with relevant public safety and community partners to ensure the establishment of effective implementation and communication protocols. To ensure protocols are effective the Companies will conduct yearly training exercises with first/emergency responders and public safety partners. The Companies will participate in disaster training exercises that are being conducted in the service areas by NV Energy’s public safety partners. To ensure communication to the public is continuous during a PSOM event, the Companies have agreements with the Washoe County, Douglas County, and Clark County Emergency Management to utilize its emergency alert systems. If additional emergency messaging is need during the PSOM, the same agreement would allow for the utilization of the Wireless Emergency Alert (“WEA”). The WEA is an alerting network in the U.S. designed to disseminate emergency alerts to mobile devices such as cell phones and tablets. The Companies will also be contracting with FirstNet for continuous internal and exterior cell communication. FirstNet is the nationwide public safety broadband network that is dedicated to first responders. The use of FirstNet is important for a few main reasons: FirstNet provides all of the first responders and other public safety personnel with a harmonized platform that allows them all to communicate with each other during a disaster; and, FirstNet will deploy additional communication on wheels (“COWs”) and satellite communicate equipment in the PSOM area to help enhance and maintain cellular in the area. The Companies will also activate the Verizon’s Crisis Response Team that will also deploy additional COWs and satellite communicate equipment in the PSOM area to help enhance and maintain cellular in the area. In the stakeholder meeting, telecommunication companies communications infrastructure providers agreed with early notification they would be able to boost cell-towers in the affected area and provide generation at sites; this would amplify cellular coverage in the area better prepare for an outage including adding temporary generation at sites. A communications infrastructure provider is any company that provides Broadband Internet Access Service (BIAS), mobile service, local exchange service, or Voice over Internet Protocol service, or is a Telephone Company. As used herein, BIAS shall include mass-market services meeting the definition found at 47 C.F.R. § 8(1)(b); mobile service shall include mass-market services meeting the definition of Personal Communications Services (PCS) found at 47 C.F.R. § 24.5; VoIP shall include mass-market services meeting the definition found at NRS 704.685(3)(b); and Telephone Company shall have the definition found at NAC 704.008835.

Detailed PDZshape (.shp) file maps of each PDZ were provided to the telecommunication companies during the stakeholder meetings communications infrastructure providers so they could develop a pre-plan and will be provided on an annual basis prior to each fire season and/or upon any upgrades to NV Energy’s system or upon any plans to de-energize new areas beyond those previously identified. Prior to the start of each fire season, NV Energy will also provide each communications infrastructure provider with an Excel spreadsheet containing their respective meter number, facility or service address, latitude and longitude, and specific PDZ based on the legal entity names provided by the communications infrastructure provider to NV Energy. Additional data may need to be exchanged which will be a collaborative process where the communications infrastructure providers or their associations will advise NV Energy if any additional sharing or data is needed. A pre-fire season meeting with telecommunication companies communications infrastructure providers will be conducted yearly to keep the plan update. The Companies will also incorporate Amateur Radio Emergency Service (“ARES”) as a back-up for all disasters. The Companies will have the necessary radio equipment in both EOCs, Back-up EOCs, and Controls Centers and will have field radios in the EOCs available for deployment. Utilization of current employees trained as amateur radio operators and the ARES volunteer amateur radio operator would be used to support the system. ARES will support back-up communications companies and statewide with EOCs across the state during a disaster.
5.7.1  Portable Generator & Distribution Interconnection Equipment, Lease & Services

The Companies plan to provide emergency generator equipment, electric distribution equipment and comprehensive services to restore and maintain electric service to critical facilities (e.g., first responders, healthcare, water and sewage treatment, telecommunications, etc.) identified during a PSOM event. The Companies’ representatives reached out to these facilities during the 2019 fire season to confirm the need for the emergency generator support and will continue to refine these communications along with contingency plan execution during the 2020 and future fire seasons.

NV Energy will ask green cross customers to utilize the Companies’ Customer Resource Centers (“CRC”) during a PSOM event. Green cross customers will receive an advance notice that can help them plan for the event. Providing customers with alternate lodging accommodations during a PSOM event will also be considered. In addition, NV Energy will encourage green cross customers to find other accommodations. NV Energy procured and will provide a limited number of portable generators to those customers who reside in Tier 3 wildfire threat areas and are certified by a licensed physician that they require immediate response from emergency personnel with life supporting equipment to sustain life or are confined to their home due to their medical condition, as certified by a licensed physician. NV Energy may install transfer switches for these customers during the PSOM event initial notification window to ensure continuity of service.

5.7.2  Corporate Communications Plan, Marketing & External Stakeholder Outreach for PSOM

Communication is of utmost importance when protecting against natural disasters. NV Energy has stress-tested and improved its customer call center capabilities to deal with the additional volume anticipated during a natural disaster event. One of the goals by making the improvements to the customer call center was to help with the possible overload to the Public Safety Answering Points (PSAPS 911 dispatch centers) during a PSOM event. NV Energy has collaborated with telecommunications companies, communications infrastructure providers, emergency responders, and government agencies to assure communications responsibilities are clear and coordinated. NV Energy plans to use an Incident Command Structure so a common language and approach is taken by the partner agencies. For example, emergency communications has a public-facing aspect for which NV Energy has assigned specific personnel based on working relationships. Collaboration among critical services providers includes Customer Resource Centers, temporary enhancement of communication capacity, and mutual aid programs.

Customers received email notifications on or around January 21, 2020 describing the Companies’ development of the NDPP pursuant to SB 329 as well as details for the public open forums, discussed further in Section 7.1. NV Energy encouraged customers to stay informed through its webpage, nvenergy.com/ndpp, to obtain updates on the Plan’s development and community engagement efforts. Additionally, customers can follow www.nvenergy.com/wildfire-safety for current notifications on potential PSOM events or wildfire emergencies, in addition to the landing page. NV Energy’s objective is to communicate as far ahead as possible to support public safety and collaborate across responders to leverage resources, channels, and media to aid in delivering the most up-to-date information to the surrounding communities. NV Energy gives focused attention on the “Green Cross” customers who are particularly impacted by grid disturbances. Additional elements of the outreach include bill inserts, media outreach, social media, public meeting sessions, emergency notifications, and other channels.

*Prepare:* NVE has developed an extensive communication plan related to natural disaster preparedness with the goal of ensuring the public is ready for, and safe during, a disaster-related outage event – including PSOM. Elements of the plan include traditional media, social media, website and blog, collateral development, direct customer communication and collaboration with preparedness partners, such as
"Living with Fire."

Customers are encouraged to take small but specific steps, such as charging cell phones, filling vehicle gas tanks, and having cash on hand as preventative measures. To enhance preparedness, NV Energy is available to conduct community meetings for specific agencies and the public.

**Mitigate:** The Companies’ previous actions and this NDPP devote significant focus and resources to mitigate against the impacts of natural disasters. Those mitigating actions include: grid resiliency and hardening; using a risk-based approach to evaluate and prioritize mitigation activities in high threat areas; leveraging community and agency mutual aid resources to maximize community awareness and participation in mitigation efforts; and taking measures aimed at reducing the likelihood of public impacts from potential failure of NV Energy equipment during a natural disaster.

**Respond:** The inevitable reality is that natural disasters will occur. NV Energy intends to communicate with and issue notifications to critical facilities, public safety partners, including communication infrastructure providers, and customers in a timely and sequenced manner to ensure an accurate flow of information delivery and response mobilization for restoration efforts. The Companies will also conduct drill response simulations to create ‘muscle memory’ and improve from lessons learned in a simulated environment. Applied learnings include providing Customer Resource Centers as a haven during response events. NV Energy has planned for additional connectivity and communications for the customers through COWs and collaborating with the telecommunication companies so they can also remedy any of their network insufficiencies that will help with communications during a PSOM event. Every action is based on harmonizing emergency response plans to be efficient and effective in the response activities, minimizing public impact wherever possible. Additional communications are directed at public safety, including the danger of damaged utility equipment such as downed power lines and how to be safe around these assets. The Emergency Operations Center is equipped to quickly mobilize to support continued communication in the event of a natural disaster.

**Recover:** NV Energy’s goal is to be prepared to assist the public in being and staying safe after emergency conditions have passed. The power grid cannot be re-energized without a purposeful and careful inspection. NV Energy will communicate the actions to impacted customers, including restoration status, as soon as it is known. Safety inspectors will be deployed as quickly as possible. Follow-up communications to vulnerable customers will be supported by the customer care professionals, including account representatives. With the first priority of public safety, NV Energy will collaborate with the community partners to communicate the return to normal and safe operating conditions.

The Companies’ PSOM communications plan, which aligns with the larger campaign to communicate efforts to mitigate wildfire risk and extreme weather conditions in Nevada, contains three phases and reflects best practices utilized by other utilities that employ PSOM for safety.

- **Phase One** creates awareness among key audiences of this new safety protocol.
- **Phase Two** addresses customer and stakeholder communication before and during a PSOM event.
- **Phase Three** focuses on restoration.

The communications plan was developed for the 2019 fire season and will be the basis for all communications planning moving forward. Although the Companies did not experience a PSOM event in 2019, Phase One was executed and the other phases were in place. Specific outreach timelines are also included in sections below.

Broadly, the key stakeholders include the following:

- NV Energy customers;
- Green Cross customers;
- NV Energy Major Accounts in high-impact areas;

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1 Nevada Division of Forestry, UNR, BLM, and USFS. “Living with Fire.” [https://www.livingwithfire.com/](https://www.livingwithfire.com/)
• Public Utilities Commission of Nevada;
• Communications Infrastructure Providers
• Bureau of Consumer Protection;
• NV Energy employees;
• Visitors to high-fire risk areas;
• Government agencies/elected officials;
• Fire Departments/First Responders;
• Local Chambers of Commerce, businesses;
• Media; and
• Local economic development agencies and planning groups.

Phase One: Educate Customers and Stakeholders about the PSOM Process

Objectives
• To educate all audiences about wildfire and extreme weather safety efforts that reduce wildfire risks, with focus on PSOM and emergency preparedness.
• Develop strategic third-party partnerships to serve as ambassadors for PSOM.
• Encourage customers in high-fire risk areas to sign up for MyAccount alerts.
• To broaden customer education regarding outage preparedness:
  • Create an outage kit that can also be used for any disaster;
  • Generator safety; and
  • Sign up for outage alerts.

Strategy and Tactics

NV Energy will reach the PSOM communication objectives by executing an integrated marketing communications strategy that disseminates consistent messaging through the following channels:

Direct Outreach: Stakeholder meetings were held between key contacts and NV Energy relationship owners, stakeholder feedback was incorporated into the outreach plan. Specific tactics related to direct outreach also include, but are not limited to, the following:

**Executed in 2019**

• Create list of stakeholders and owners to track outreach and feedback.
• Host Open House-style meetings in high-risk areas in partnership with local fire and emergency officials.

Ongoing Effort (but also executed in 2019)

• NV Energy Major Account representatives to have one-on-one meetings with major customers including communications infrastructure providers in impacted areas to explain PSOM and seek input on how NV Energy can lessen any impacts.
• Work with NV Energy Operations and Customer Operations to ensure that customers who may not be key accounts, but could be negatively impacted by PSOM, are contacted.
• NV Energy Government Affairs team to have one-on-one meetings with relevant public officials and elected officials regarding PSOM.
• NV Energy Emergency Management team to have regular, ongoing meetings with emergency organizations (fire, police, emergency managers for local jurisdictions, National Weather Service) in impacted areas regarding PSOM.
• Target social media posts to these areas to raise awareness of PSOM and encourage them to sign up for alerts (if they have not already.)
Upon Plan Approval or In Preparation for a PSOM Event

- NV Energy Corporate Communications to hold a weekly meeting with stakeholder owners to discuss outreach efforts.
- NV Energy Regulatory to provide an overview of PSOM to the Commission, Staff and Bureau of Consumer Protection.
- NV Energy Corporate Communications to communicate with Public Information Officers for impacted areas, tourism organizations, Chambers of Commerce and emergency groups regarding PSOM.
- NV Energy Community Relations to communicate with their contacts at nonprofits who provide emergency assistance, Chambers of Commerce, local economic development agencies and planning groups etc.
- Distribute letter via mail and email to customers in the high-risk areas to explain PSOM. This will be followed up by a phone call from customer service.
- Present at currently scheduled public meetings in high-risk areas.
- Send MyAccount email to all customers.
- Develop content for My Energy Snapshot promo.
- Include information in quarterly customer newsletter.
- Create a bill ad for impacted customers.
- Provide materials (Frequently Asked Questions (“FAQ”), talking points, etc.) to NV Energy Customer Operations to assist with customer representative training.
- Provide live, direct calls and email to communications infrastructure providers. Communications infrastructure providers shall be responsible to provide and update contact information to a contact specified by NV Energy.

Media Outreach (executed in 2019 but will also continue in 2020 and beyond):

- Hold deskside meetings with television station assignment managers and local print reporters to explain PSOM.
- Distribute press release to print and television media from NV Energy to explain and set the stage for possible PSOM events and encourage outage preparedness.
  - Target weather reporters.
  - Include tourist publications that target Mt. Charleston and Lake Tahoe.
  - Send to Chambers of Commerce and tourism groups for inclusion in their newsletters and on social media.
- Seek opportunities to promote wildfire safety and PSOM with partner organizations.
  - Wildfire Preparedness Month.
- Develop pitch on the importance of creating an outage preparedness kit.
- Create FAQs on PSOM for media and nvenergy.com.
- Distribute alerts to communicate PSOM event status.
- NV Energy Corporate Communications will develop scripts and alert templates for use by Customer Operations regarding PSOM events.

Social Media:

- Develop video content explaining PSOM – process, notification and restoration.
  - What conditions are monitored?
  - Get fire officials to explain the importance of doing this/share on their channels.
- Create videos to highlight the importance of outage preparedness.
  - What should be included in an outage kit?
  - Demonstrate how to open a garage door without power.
  - Explain the kinds of alerts will be sent.
- Create preparation checklist infographics.
- Share posts by National Weather Service with weather information and local fire jurisdiction safety and fire danger alerts.
- Share posts from partner organizations regarding wildfire safety and preparedness.
- Provide outage status warnings and subsequent updates.

**Website:**
- Create page dedicated to explaining PSOM. Content will include:
  - What NV Energy is monitoring.
  - Explanation Videos.
    - What is PSOM?
    - Be Prepared for an Outage.
  - PSOM FAQs.
  - Maps of Tier 3 areas.
  - Outage Preparedness.
    - What's in Your Outage Kit.
    - Generator Safety.
  - Link to sign up for MyAccount alerts and Green Cross.
  - Up-to-date information with PSOM warnings and status updates.
- Ensure the outage map has PSOM available as an outage cause.
  - Add a “key” to explain outage map causes.

**Grass Roots:**
- Create flyer with information on PSOM and outage preparedness information, including links to other resources.
- Provide training to employees who volunteer at events to answer questions regarding PSOM.
- Distribute PSOM flyer at community events staffed by Community Relations, PowerShift and Business Solutions Center.
- Purchase branded giveaways that link to website.
  - Flashlights.
  - External cell phone chargers.
- Collateral Development:
  - Flyer.
  - Placard to be placed in rental cabins, hotels to explain PSOM, outage safety and where to get more info.
  - Direct mail postcard.
- Attend Chamber of Commerce meetings to distribute information and collateral.

**Visitor Outreach:**
- Provide PSOM training/information to employees of Tier 3 casinos and visitor centers.
- Place flyer/table tent with PSOM and evacuation/safety information in vacation rentals.
  - Research possibility of including flyer/table tent in permit packet for vacation rentals in Washoe and Douglas County.
- Utilize county emergency alert system to notify visitors of pending PSOM event in Tier 3 areas.
- Utilize NDOT signage to provide PSOM information.

**Paid Media and Sponsorships:** to align with overall Wildfire Risk Management Outreach.
- Direct mail campaign to impacted customers.
- Radio spots.
- Digital.
- Outdoor.
- Social Media.
- Sponsorships with nonprofit agencies who promote fire safety and preparedness.
The Companies conducted extensive personal outreach with key stakeholders in the areas impacted by PSOM. Talking points, informational flyers, dedicated website and presentations that focused on ongoing efforts were developed to assist with this outreach, which included: meetings with fire personnel, including fire chiefs; federal, state and local elected officials; county emergency managers; large customers; chambers of commerce; tourism groups; and others. The Companies’ fire mitigation specialist also participated in several of these meetings. The goal of the outreach is to make these stakeholders aware of this new safety protocol, and to better understand their needs before and during a PSOM event in order to mitigate its impact on their respective agencies and communities. Direct stakeholder outreach was conducted, and the outreach team met weekly to discuss progress and next steps.

The Companies also distributed a letter via U.S. mail to all residential and business customers in the impacted areas. The letter explained why the Companies are implementing PSOM, encouraged customers to be prepared for a possible outage, to sign up for outage alerts via MyAccount and to enroll in Green Cross, if appropriate. The PSOM flyer was mailed with the letter to residential customers. These letters were also followed up with a phone call from the customer service team to ensure they are aware of the possibility of a PSOM event and the process to communicate; and to encourage them to sign up for email and/or text outage alerts and to address and note their concerns regarding PSOM.

Broader customer communication was also conducted with the distribution of a PSOM press release to northern and southern Nevada media, resulting in coverage in both broadcast and print media. The Companies also participated in the Wildfire Safety Expo in South Tahoe on June 15, 2019. Public open house events to provide customers with information on PSOM and answer their questions were conducted in northern Nevada on June 26, 2019, in Stateline, Nevada; on July 8, 2019, in Douglas County, Nevada and on July 17, 2019, in Incline Village, Nevada. An open house event in Mt. Charleston, Nevada was also conducted on July 16, 2019. An article on PSOM was also included in the summer quarterly customer newsletter, which was distributed with customer bills starting in July. Paid media outreach to raise awareness of PSOM was also conducted starting on July 1, 2019.

Employees are the best ambassadors for helping customers understand new programs and initiatives, like PSOM. The Companies provided an overview of PSOM at an employee presentation, and held employee “lunch and learn” events in both northern and southern Nevada.

NV Energy also held a series of meetings with the EWG, whose members included telecommunications companies, communications infrastructure providers and emergency management professionals. This was enhanced by additional outreach to the public with support of participating experts. The results of these outreach efforts helped inform the PSOM communications plan and telecommunications plan, which will be refined throughout continued conversations with telecommunications stakeholders, communications infrastructure providers in 2020. NV Energy intends to continue meeting with experts as an ongoing effort to enhance communications and leverage infrastructure and new technologies, including an expansion of a higher frequency radio system. Communications to the public are handled by special-purpose departments and enhanced by NV Energy’s direct relationships with organizations and customers. There is a self-identification process for customers requesting special assistance, such as ‘Green Cross’ customers. NV Energy does an annual structured refresh in addition to on an as-requested basis.

The Companies have coordinated this plan with federal, state, and local entities to ensure maximum awareness of the Plan and to solicit input. This also includes both local and regional fire departments, as well as local and federal forestry divisions to ensure coordination for vegetation management and public safety. Communication of this plan to first responders ensures that the Companies’ infrastructure, that may be a public safety issue, such as a downed line, are communicated to NV Energy for de-energization in the shortest time possible to minimize impact to public safety, whether from electrocution or fire ignition. As noted above, the Companies will also continue to work with the Nevada Department of Public Safety, Division of Emergency Management and emergency managers for various counties, communities within the Tahoe and Mt. Charleston areas along with city jurisdictions. This coordination also included tribal governments that may be affected.
NV Energy has created a new section of the website (www.nvenergy.com/wildfiresafety) that outlines the efforts to mitigate risk of wildfire and extreme weather, including PSOM. The front page of nvenergy.com highlights PSOM during wildfire season and links directly to the PSOM section. NV Energy will continue to augment the website with new content including videos and infographics to help further engender understanding of PSOM and the importance of being prepared for a possible outage. A PSOM flyer has also been designed for use at community events, and can be downloaded from the website.

**Phase Two: Communicate with Customers and Stakeholders before and during a PSOM Event**

**Objectives**
- To provide advance notice to impacted customers of a possible event.
- To communicate with customers during a PSOM event.

**Strategy and Tactics**
NV Energy will reach these goals by executing an integrated marketing communications strategy that disseminates consistent messaging through the following channels. A timeline of when these will be utilized may be found below. During a PSOM event, appropriate communications protocols will be followed.

**Direct Communication**
- Customer Operations will contact impacted residential and small business customers via automated calls in advance of an event.
- Green Cross customers will be contacted in person by a customer service representative.
- Alerts will be distributed to customers who have signed up for them via automated phone call, text, and email.
- Major Accounts will call impacted customer accounts and work with the Operations team to provide pre-determined assistance.
- NV Energy Government Affairs, Emergency Management, Corporate Communications and Regulatory teams will inform relevant stakeholders regarding a possible and pending event.
- NV Energy Corporate Communications will develop scripts and alert templates for use by NV Energy Customer Operations regarding PSOM events.
- Use county phone alert system to notify customers in impacted areas.
- Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers in advance of an event. Communications infrastructure providers shall be responsible to provide and update contact information to a contact specified by NV Energy.

**Media Outreach**
- Distribute media alert to television and print publications in impacted areas.
- Provide on-camera interviews as requested to further explain PSOM and encourage outage preparedness.
- Hold press conference if needed to distribute updates on restoration status.

**Social Media**
- Post PSOM “watch” and “warning” posts to Facebook and Twitter per timeline below.
- Provide restoration updates as needed.
- Create videos to share prior to and during the event to explain current conditions and why NV Energy may have de-energized (Facebook Live and Periscope).
- Use social media video channels to broadcast press conference.
- Show photos of any damage to lines caused by weather conditions.
- Post photos of crews walking the line prior to re-energization.

**Website**
- Utilize website alert/notification feature to post PSOM “watch” and “warning” messages.
- Update PSOM web page with current information regarding PSOM status.
• Create banner on nvennergy.com during an event that links to PSOM page with updates.

Internal
• Post "watch" and "warning" updates on MyNVE.
• Send broadcast to employees when a PSOM event is activated and re-energized.

Paid Media – to align with overall Wildfire Risk Management Outreach
• Direct mail campaign to impacted customers;
• Radio spots;
• Digital;
• Outdoor; and
• Social Media.

Customer Notification Timeline
NV Energy will receive refreshed PSOM threshold notifications from the external weather analytics expert, REAX Engineering, at the 8-day, 3.5-day and 1.5-day mark prior to the PSOM trigger with expected duration of the event. Based on these notifications, NV Energy will follow the following notification timelines:

These notification timelines are based on the quantitative PSOM threshold notifications for all customer types, including but not limited to first responders, emergency managers and others. Some customers may need more advance notifications than others. Therefore, NV Energy will continue to work with specific customer types who may need notifications under different timelines or additional notifications to meet specific needs.

8 Days Prior (Or when NV Energy is made aware that an event is possible):
• NV Energy Emergency Management, Government Affairs, Regulatory and Major Accounts will contact their stakeholders as requested regarding timing.
• NV Energy Operations will notify affected local utilities as needed.

3.5 Days Prior:
• NV Energy customer operations will reach out to Green Cross customers with an in-person call.
• NV Energy Corporate Communications will post information on PSOM website and will include an alert message on the homepage of nvennergy.com.
• NV Energy Corporate Communications will issue media alert
• NV Energy Corporate Communications will post information on social media – targeting impacted areas.
• NV Energy Major Accounts will alert their customers and work with Operations team to implement any assistance.
• NV Energy Emergency Management, Government Affairs, Regulatory, Community Relations and Corporate Communications will contact their stakeholders.
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs.

48 hours Prior:
• NV Energy Customer Operations will engage in outage alerts to reach impacted customers (automatic call-outs, text and email).
• NV Energy Corporate Communications will update information on nvennergy.com, the alert message and PSOM webpage.
• NV Energy Corporate Communications will send media alerts and will post updates on social media – targeting impacted areas.
• NV Energy Major Accounts will maintain communications with their customers.
• NV Energy Emergency Management, Government Affairs, Regulatory, Community Relations and Corporate Communications will maintain contact with their stakeholders.
• NV Energy Emergency Management, Fire Mitigation Specialist will work with County Emergency Managers on alert messaging from the county's alert system.
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs and an estimate of the restoration time, if available.

24 Hours Prior:
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs and estimated restoration time which may change.

2 Hours Prior:
• NV Energy Customer Operations will engage in outage alerts to reach impacted customers.
• NV Energy Corporate Communications will update information on n-energy.com.
• NV Energy Corporate Communications will post updates on social media – target impacted areas.
• NV Energy Major Accounts will alert their customers.
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs and estimated time of restoral which may change.

1 Hour Prior:
• NV Energy Customer Operations will engage outage alerts to reach impacted customers.
• NV Energy Corporate Communications will update information on n-energy.com.
• NV Energy Corporate Communications will post on social media – target impacted areas.
• NV Energy Corporate Communications will send media alert.
• NV Energy Major Accounts will alert their customers.
• NV Energy Emergency Management, Government Affairs, Regulatory, Community Relations and Corporate Communications will maintain contact with their stakeholders.
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs and estimated time of restoral which may change.

Start of Event:
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers with information on impacted PDZs and estimated time of restoral which may change.

Cancellation of Event:
• NV Energy Major Accounts or Customer Operations will immediately provide live, direct calls and email to communications infrastructure providers if a PSOM event that was previously noticed is cancelled.

During the Event:
• Provide information/scripts to customer operations as needed.
  o Estimated Time of Restoration ("ETR") Status.
• When the Companies experience extended outage durations in general, CRCs serve as a response support activity for customers needing power. In general, these CRCs are intended to support short-duration outages, but NV Energy will extend hours of support where viable or appropriate, and will alert customers that CRCs are being made available (during an extended outage, but may also be enabled earlier under specific circumstances).
• Keep update information on n-energy.com.
  o Home Page.
  o PSOM webpage.
  o Outage map reflects correct outage cause.
• Provide updates on social media accounts – target impacted areas.
  o Monitor questions and assist, as needed, with customer responses.
• Provide communication infrastructure providers ETR status on an on-going basis prior to and during the event.

Phase Three: Restoration – communicate with affected customers and key stakeholders on step restoration process and ETR for specific areas

• NV Energy Customer Operations will engage outage alerts to reach impacted customers.
• NV Energy Corporate Communications will update information on nvenergy.com.
• NV Energy Corporate Communications will post updates on social media.
• NV Energy Corporate Communications will send media alerts.
• NV Energy Major Accounts will alert their customers.
• NV Energy Emergency Management, Government Affairs, Regulatory, Community Relations and Corporate Communications will alert their stakeholders.
• NV Energy Major Accounts or Customer Operations will provide live, direct calls and email to communications infrastructure providers.

The Companies’ Fire Mitigation Specialist will also be involved in responding to a PSOM event and will leverage our corporate EOC for maximum benefit. As identified by the Companies, confirmed in the expert working group, and public outreach, telecommunications is an essential component of protection from natural disasters. Additional actions will include the opportunity for telecommunication providers to harden their systems in the areas of the identified CRCs. In practice drills, it was apparent that customers’ needs during an outage could overwhelm existing telecommunications networks. Some options considered to mitigate this issue include NV Energy is considering additional COWs or satellite communication systems to provide temporary support in vulnerable locations to resolve communication issues. Notification in advance and pursuant to the foregoing timelines is necessary so that communications infrastructure providers can better prepare in advance with backup power resources and otherwise to mitigate the impacts of the PSOM events.
CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Fennemore Craig, P.C. and on May 28, 2020, I caused to be served, a true and correct copy of the foregoing STIPULATION via electronic mail, or as indicated below, to the following parties:

**NV ENERGY:**
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**PUBLIC UTILITIES COMMISSION OF NEVADA:**
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Dated this 28th day of May, 2020.

_/s/Diana L. Wheelen_____________________
Diana L. Wheelen