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District of Columbia**

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August 31, 2010

VIA ELECTRONIC FILING

Dorothy Wideman
Commission Secretary
Public Service Commission
of the District of Columbia
1333 H Street, N.W.
Second Floor West Tower
Washington, D.C. 20005

Re: Formal Case No. 1082, In The Matter of the Investigation into the Distribution System Reliability Performance of the Potomac Electric Power Company in the District of Columbia

Dear Ms. Wideman:

Enclosed for filing in the above-referenced proceeding are an original and three (3) copies of the "Motion of the Office of the People's Counsel for an Expanded Investigation and Hearings into the System Reliability and System Outage Response of the Potomac Electric Power Company."

If there are any questions regarding this matter, please contact me at (202) 727-3071.

Sincerely,

Brian O. Edmonds, Esq.
Assistant People's Counsel

Enclosure

cc: Parties of record

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

In the Matter of	§	
	§	
The Petition for an Investigation into	§	Formal Case No. 1082
The Electric Distribution System	§	
Reliability Performance of the	§	
Potomac Electric Power Company	§	
in the District of Columbia	§	

**MOTION OF THE OFFICE OF THE PEOPLE’S COUNSEL
FOR AN EXPANDED INVESTIGATION AND HEARINGS INTO THE SYSTEM
RELIABILITY AND SYSTEM OUTAGE RESPONSE OF THE POTOMAC ELECTRIC
POWER COMPANY IN THE DISTRICT OF COLUMBIA**

I. INTRODUCTION

Pursuant to D.C. Code Ann. §§ 1-204.93, 34-808, 34-903, and 34-908, and Rule 105.8 of the Public Service Commission’s (“PSC” or “Commission”) Rules of Practice and Procedure,¹ the Office of the People’s Counsel of the District of Columbia (“Office” or “OPC”) respectfully requests the Commission, under its plenary authority over the Potomac Electric Power Company (“PEPCO” or “Company”) to expand the investigation requested by the Office in its August 6 Petition to conduct a formal investigation into PEPCO’s system reliability and system restoration following outages caused by storms in July and August 2010.² Specifically, OPC requests the Commission convene an evidentiary hearing with PEPCO and relevant District agencies to discuss the lessons learned from the outage response and to develop strategies for enhancing the response to system

¹ 15 D.C.M.R. § 105.8 (2008).

² Pursuant to 15 DCMR 3601.18, PEPCO is required to file a Major Outage Report three (3) weeks following the end of a major service outage.

outages caused by natural disasters.³ OPC further requests the Commission convene community hearings to allow the public to provide input for this strategy development. It has been the Office's experience that the public has consistently provided valuable, constructive information and insight into problem solving that can translate into meaningful laws and policies.

II. SUMMARY OF OPC's MOTION

The Office requests the Commission:

- grant this request to expand the investigation sought in its August 6 Petition and conduct a formal investigation into PEPCO's system restoration following outages caused by storms in July and August 2010;
- expeditiously convene a hearing with PEPCO and relevant District agencies to discuss lessons learned from the outage response and develop strategies for enhancing the response to system outages caused by natural disasters;
- expeditiously convene community hearings to allow the public to provide input for outage response strategy development;
- determine whether the District Response Plan adequately provides for the needs of affected District consumers; and
- determine the adequacy of resources PEPCO has to maintain system reliability in order to withstand the severe damage on the system and PEPCO's ability to swiftly restore power to affected consumers.

III. BACKGROUND

Thousands of District consumers have experienced outages of varying duration following storms this summer, causing a major crisis for those seeking assistance. The Office recognizes

³ OPC notes the Maryland Public Service Commission ("MD PSC") initiated a proceeding to investigate the reliability of PEPCO's electric distribution system and the quality of electric distribution service and convened a hearing on August 17, 2010 in order for PEPCO to respond to questions from the MD PSC and for the MD PSC to frame the procedures by which the investigation will be conducted. See, MD PSC Case No. 9240, *In the Matter of an Investigation into the Reliability and Quality of the Electric Distribution Service of Potomac Electric Power Company*, Order No 83526, rel. Aug. 12, 2010. The MD PSC held its first public hearing on August 30, 2010, for the purpose of receiving

PEPCO's efforts to respond to the crisis caused by these storms, but is perplexed as to why PEPCO appears to lag in its restoration efforts when compared to its sister utilities in the neighboring jurisdictions. What is of paramount importance to District consumers is proactive, corrective action that enhances the ability of PEPCO and other entities who play a role in assisting District consumers during such crisis. The goal is to ensure the response to any emergency is expedient and efficient. Consumers are often unaware of whom to contact when they experience an outage of this nature and otherwise do not receive timely and accurate estimate restoration information. Storms and weather events are not new to this jurisdiction, yet PEPCO's response and communication with the public remains consistently and woefully inadequate. Indeed, the myriad of problems occasioned by these storms raises serious concern that the many plans of action devised over the last seven years following Hurricane Isabel to respond to system outages caused by natural disasters are not being fully followed. Moreover, PEPCO's slower than expected response to these storm-related outages raises concerns about the adequacy of PEPCO's internal staffing resources, the state of the infrastructure and the Company's ability to swiftly restore power to affected consumers.

This Commission has granted PEPCO an over \$47 million increase in distribution service rates over the last two years. During this period, the Office repeatedly sought to have PEPCO's distribution service performance evaluated to determine if the increases granted were commensurate with the Company's obligation to provide safe, adequate, and reliable distribution service in the District of Columbia. Unfortunately, the Commission was unwilling to make this essential evaluation in the context of either distribution rate proceeding. Not surprisingly, the District has

public comments on the reliability and the quality of PEPCO's electric distribution service. A second public hearing has been scheduled for September 2, 2010.

seen a neglected electric distribution service system deteriorate to the point where these storms further expose problems that demand immediate attention. To simply rely on broken promises and reports without taking proactive steps to address the problem provides District consumers no assurances that the Commission is committed to ensuring public utilities operating in the District provide safe, adequate and reliable service. Consumers have been frustrated by problems when contacting PEPCO to report outages at 1-877-737-2662. At times the number was either busy or a recording indicated the number was not in service. Moreover, consumers are unclear about the process PEPCO undertakes to process claims for losses caused by system outages. There needs to be a more definitive understanding of PEPCO's claims process so consumers know how to file a claim and what is necessary to qualify. The fact that the Company would self grade itself at the "D" level in terms of customer communications is both shocking and unacceptable.⁴

The Office is committed to ensuring District consumers receive what they pay for in rates—safe, adequate and reliable service. In the ten years since PEPCO's generation asset divestiture and the District's retail electric market restructuring, the quality of distribution service has steadily declined.⁵ There has been no demonstrable improvement in service quality. Yet, District ratepayers are paying more while getting less. This needs to stop.

It appears there is some confusion as to which agency of the District government takes the lead in the event of an emergency that affects the delivery of electricity. The District Response Plan

⁴ WTOP Radio Network, *Pepco grades itself on customer communications* < <http://www.wtopnews.com/?nid=858&sid=2015623>> (accessed Aug. 16, 2010).

⁵ Formal Case No. 766, *In the Matter of the Commission's Fuel Adjustment Clause Audit and Review Program* and Formal Case No. 991, *In the Matter of the Investigation into Explosions Occurring In or Around the Underground Distribution Systems of Potomac Electric Power Company*, Order No. 15152 at ¶ 60, rel. Jan. 6, 2009.

("DRP") is the city's plan outlining the "tasks that support emergency response in the District of Columbia and provides a framework for coordinating that response across District, local and federal agencies."⁶ The DRP has designated the District Department of the Environment ("DDOE") as the primary District agency "responsible for coordinating with all other governmental department response elements and utilities to restore the District's energy systems."⁷ A copy of the relevant pages of the DRP is attached as Attachment I. A careful examination of this plan will provide the Commission and the public information of the proper protocols and ensure the Commission is satisfying its legal obligation to ensure the safe, adequate and reliable delivery of electricity in the District of Columbia.

In addition, of utmost importance is PEPCO's use of its internal Incident Command System ("ICS") and whether it functions as intended. The ICS is a key element of the National Incident Management System ("NIMS") created by the Federal Emergency Management Agency ("FEMA"), which is now part of the Department of Homeland Security ("DHS"), and provides a consistent template for managing incidents.⁸ ICS is a system of emergency response that functions effectively regardless of the cause, size, location or complexity of the incident. It provides a framework that facilitates government, utilities and other private entities to work together to manage incidents.⁹

⁶ District Response Plan at page i, December 2008 *available at* http://dcema.dc.gov/dcema/frames.asp?doc=/dcema/lib/dcema/pdf/district_response_plan.pdf.

⁷ *Id.* at ESF 12-1.

⁸ *See*, Federal Emergency Management Agency, NIMS Resource Center <http://www.fema.gov/emergency/nims/index.shtm> for more information (accessed July 9, 2009).

⁹ Federal Emergency Management Agency, ICS Resource Center, ICS Review Documents, <http://training.fema.gov/EMIWeb/IS/ICSResource/assets/reviewMaterials.pdf> (accessed July 9, 2009).

PEPCO's last Major Outage Report from the June 4, 2008 event made no mention of the use of ICS or whether it functioned as intended.¹⁰ While the recent July and August major outage events have been unfortunate, it should give PEPCO good indication as to how ICS functioned and where PEPCO can improve its performance and management of a crisis.

IV. DISCUSSION

Given the critical need to ensure the provision of safe, adequate and reliable service, the assessment of PEPCO's response to system outages requires a re-evaluation of PEPCO's performance under the existing plans and protocols. There must be an assessment as to whether proactive enhancements to these plans and protocols are necessary to restore public confidence.

A. SYSTEM RESTORATION

It has been widely reported that PEPCO's system restoration response has been far less acceptable today given what were expected improvements to the Company's response to outages during the 2003 storm and hurricane season. In order to consider the next steps, it is important to fully understand the historical developments. Nearly seven years ago, the District experienced the very same thing as this summer (i.e., severe power outages).

District consumers suffered severe outages in August 2003 resulting from thunderstorms in the area. Less than a month later, Hurricane Isabel caused devastating power outages for days. Following the crisis occasioned by the storms and the hurricane, OPC requested the Commission fully investigate PEPCO's response to natural disasters and discuss strategies for improving electric

¹⁰ Formal Cases 982 & 1002, District of Columbia Major Service Outage Report June 4, 2008 Storm (July 1, 2008).

power restoration after such disasters.¹¹ The Commission held a community hearing on November 13, 2003 and an informational hearing on November 14, 2003. In October 2003, PEPCO requested James Lee Witt Associates (“JLW”) to “review Pepco and Conectiv’s preparation for and response to Hurricane Isabel, and to provide recommendations for improvement from a crisis management perspective.”¹² In its Pepco Holdings, Inc. Hurricane Isabel Response Assessment (“Witt Report”), JLW’s review of PEPCO’s response to Hurricane Isabel revealed three “broad and recurring themes” under which most JLW’s findings, conclusions and recommendations fit:

- An insufficient appreciation on the part of PEPCO and Conectiv that the outage was a community event, not just a utilities event;
- A need for sharper and more rapid focus on customer service in a disaster environment; and
- A need for the emergency management function to have a higher priority, with emphasis on developing operating concepts and support systems that can be scaled to respond to both routine and mass outages.¹³

The Witt Report provided a number of recommendations from improving collaborative response planning and restoration among PEPCO, local officials, and other utilities to the development of tree management programs.¹⁴

¹¹ Formal Case No. 982, *In the Matter of an Investigation into the Power Outages of August 2003*, Petition of the Office of the People’s Counsel Requesting the Commission to Convene Two Hearings—A Public Hearing/“Roundtable” with PEPCO and Government Agencies and a Community Hearing To Allow For a Discussion of Strategies To Improve the Restoration of Electrical Power After a Natural Disaster, filed Sep. 3, 2003 and Renewed Petition and expanded request of the Office of the People’s Counsel for an Investigation and Hearings into PEPCO Responses to the 2003 Natural Disasters and Request to Enlarge the Scope of the Investigation to Encompass PEPCO’s Response to Hurricane Isabel, filed Sep. 24, 2003.

¹² Formal Case No. 982, *Pepco Holdings, Inc. Hurricane Isabel Response Assessment* at 1, filed Jan. 12, 2004 (“Witt Report”).

¹³ *Id.* at 2.

¹⁴ *Id.* at 4-5.

On May 26, 2004, PEPCO filed the Pepco Holdings, Inc. Response to the Witt Report in which PEPCO summarized how it was addressing the three broad areas of concern identified by JLW.¹⁵ PEPCO indicated, “PHI is taking aggressive steps to address the recommendations found in the Witt Report and identified in our own internal review. The majority of changes are scheduled to be implemented prior to the 2004 storm season, with some extending into next year.” Given the problems experienced following the recent storms, the Office recommends the Commission examine PEPCO’s performance to ensure it is adequately taking the steps suggested by JLW with an eye towards making enhancements to its restoration performance, including “conducting at least one unannounced off-hours mobilization per year,” which is not the same as exercising PEPCO’s notification system.¹⁶

B. VEGETATION MANAGEMENT

Vegetation management has always been an issue of concern not only in storms, but in general as it relates to ensuring system reliability. In response to OPC’s request for the establishment of a tree trimming and maintenance task force to address vegetation management concerns, the Commission convened a Tree Trimming Working Group in November 2004 to create a process and plan for vegetation management in the District.¹⁷ The Tree Trimming Working Group filed its Vegetation Management Plan for Utility Tree Pruning in the District of Columbia and its Community

¹⁵ Formal Case No. 982, Pepco Holdings, Inc. Response to the James Lee Witt Associates Hurricane Isabel Response Assessment, filed May 26, 2004.

¹⁶ F.C. 982, PEPCO Holdings, Inc. Hurricane Isabel Response Assessment prepared for PEPCO Holdings, Inc. by James Lee Witt Associates, LLC, page 102 (Jan. 12, 2003).
F.C. 982, Final Report of Pepco in Response to Commission Order No. 13381, page 2.

¹⁷ Formal Case No. 982, Order No. 13431, re. Nov. 19, 2004.

& Resident Education Plan on March 17, 2005.¹⁸ The Commission approved both plans on December 21, 2005.¹⁹ The Office recommends the Commission examine whether vegetation management in the District of Columbia needs to be enhanced to ensure trees do not play a significant role in the cause of power outages in the District.²⁰

C. DRP AND UTILIZATION OF ICS

In December 2008, the District's Homeland Security and Emergency Management Agency, in conjunction with other key stakeholders, updated the DRP, which "outlines the tasks that support emergency response in the District of Columbia and provides a framework for coordinating that response across District, local and federal agencies."²¹ The DRP has a designated emergency support function for energy wherein DDOE is designated as the primary District agency "responsible for coordinating with all other governmental department response elements and utilities to restore the District's energy systems."²² Supporting District agencies include the Department of Public Works, District Department of Transportation, and Homeland Security and Emergency Management Agency.

It is essential to determine whether the plan is being properly executed by DDOE and the supporting District agencies. PEPCO may, indeed, rely on the resources of some agencies in its

¹⁸ Formal Case No. 982, Vegetation Management Plan for Utility Tree Pruning in the District of Columbia and Community & Resident Education Plan, filed Mar. 17, 2005.

¹⁹ Formal Case No. 982, Order No. 13847, re. Dec. 21, 2005.

²⁰ See, OPC Comments Addressing PEPCO's 2010 Consolidated Report for additional discussion on the efficacy of PEPCO's vegetation management program, pages 30-32.

²¹ District Response Plan at page i, December 2008 available at http://dcema.dc.gov/dcema/frames.asp?doc=/dcema/lib/dcema/pdf/district_response_plan.pdf.

²² *Id.* at ESF 12-1.

restoration efforts or run the risk of being unfairly blamed. To the extent the District's coordination needs to be enhanced, the Commission should be positioned to make appropriate recommendations through this investigation.

The PSC needs to examine PEPCO's use of its internal ICS to determine whether it functions as intended. ICS is a key element of NIMS created by FEMA, which is now part of DHS, and provides a consistent template for managing incidents.²³ ICS is a system of emergency response that functions effectively regardless of the cause, size, location or complexity of the incident. It provides a framework that facilitates government, utilities and other private entities to work together to manage incidents.²⁴ PEPCO's last Major Outage Report from the June 4, 2008 event made no mention of the use of ICS or whether it functioned as intended.²⁵ While the recent July and August major outage events have been unfortunate, it should give PEPCO good indication as to how ICS functioned and where PEPCO can improve its performance and management of a crisis.

Utilities have always taken the challenge of restoration to be a serious task worthy of full mobilization and maximum effort on the part of all employees. PEPCO, it is presumed, is no different. Utility workers consider restoration to be a key part of their job and they are almost always good at it. In this context, the "job" is considered both a technical and a physical challenge relating to restoring service to customers. Improvements in processes and proactive planning must be made

²³ See, Federal Emergency Management Agency, NIMS Resource Center <http://www.fema.gov/emergency/nims/index.shtml> for more information (accessed July 9, 2009).

²⁴ Federal Emergency Management Agency, ICS Resource Center, ICS Review Documents, <http://training.fema.gov/EMIWeb/IS/ICSResource/assets/reviewMaterials.pdf> (accessed July 9, 2009).

²⁵ Formal Cases 982 & 1002, District of Columbia Major Service Outage Report June 4, 2008 Storm (July 1, 2008).

to satisfy the needs of their customers. OPC's September 2009 Analysis of the Potomac Electric Power Company's Distribution System in the District of Columbia expressed its concerns and discussed at length PEPCO's ICS and made relevant recommendations. OPC renews the recommendations therein for the Commission's consideration and adoption.²⁶

D. ADEQUACY OF PEPCO RESOURCES

Much can be said about the adequacy of resources PEPCO has to timely and effectively address system reliability and outage restoration. There is no secret that the District's electric distribution system is far less reliable than consumers and public officials expect.²⁷ A strategic view of reliability, especially given PHI's announced plans for a multi-billion dollar infrastructure enhancement, suggests more needs to be done to determine how PEPCO's system should be enhanced to improve its reliability and whether its current work force can meet the challenge. Additionally, according to reports, PEPCO dispatched crews from other utility companies to assist it with power restoration.²⁸ While this is commonly done in the industry in response to catastrophic events, PEPCO's need in this instance raises serious concerns about the adequacy of PEPCO's internal staffing resources. This investigation should explore whether staff attrition, PEPCO's past

²⁶ F. C. 766, 982, 991, 1002, 1026 & 1062, OPC's Analysis of the Potomac Electric Power Company's Distribution System in the District of Columbia (Sept. 25, 2009).

²⁷ Formal Case No. 766, *In the Matter of the Commission's Fuel Adjustment Clause Audit and Review Program*, PEPCO's 2010 Consolidated Report, pages 92-110 (Feb. 25, 2010); PEPCO's 2009 Consolidated Report, page 1 (Feb. 17, 2009);

Formal Case No. 991, *In the Matter of the Investigation into Explosions Occurring in or Around the Underground Distribution Systems of the Potomac Electric Power Company*, PEPCO's 2010 Consolidated Report pages 92-110 (Feb. 25, 2010); PEPCO's 2009 Consolidated Report, page 1 (Feb. 17, 2009).

²⁸ Power Outages Expected to Linger Days After Washington Area Storm, Washington Post, July 27, 2010 available at <http://www.washingtonpost.com/wp-dyn/content/article/2010/07/26/AR2010072601401.html>.

cost containment efforts, including system maintenance, and other factors play a role in reducing the Company's ability to provide safe, adequate and reliable service to District consumers.

V. REQUEST FOR FORMAL HEARING

D.C. Code § 34-908, D.C. Code § 34-914 and D.C. Code § 34-915 require the Commission to hold a formal hearing before issuing an order affecting the complained upon rate, regulation, act or making a final determination as to whether PEPCO is fulfilling its legal obligation to provide safe, adequate and reliable service in the District. The Office reiterates its request for the Commission to convene a formal, evidentiary hearing in this matter. OPC also requests the Commission convene public hearings.

VI. CONCLUSION

WHEREFORE, for the reasons stated above, OPC respectfully requests the PSC grant this motion and conduct a formal investigation into PEPCO's system restoration following outages caused by storms in July and August 2010 in accordance with the requests more specifically discussed herein.

Respectfully submitted,



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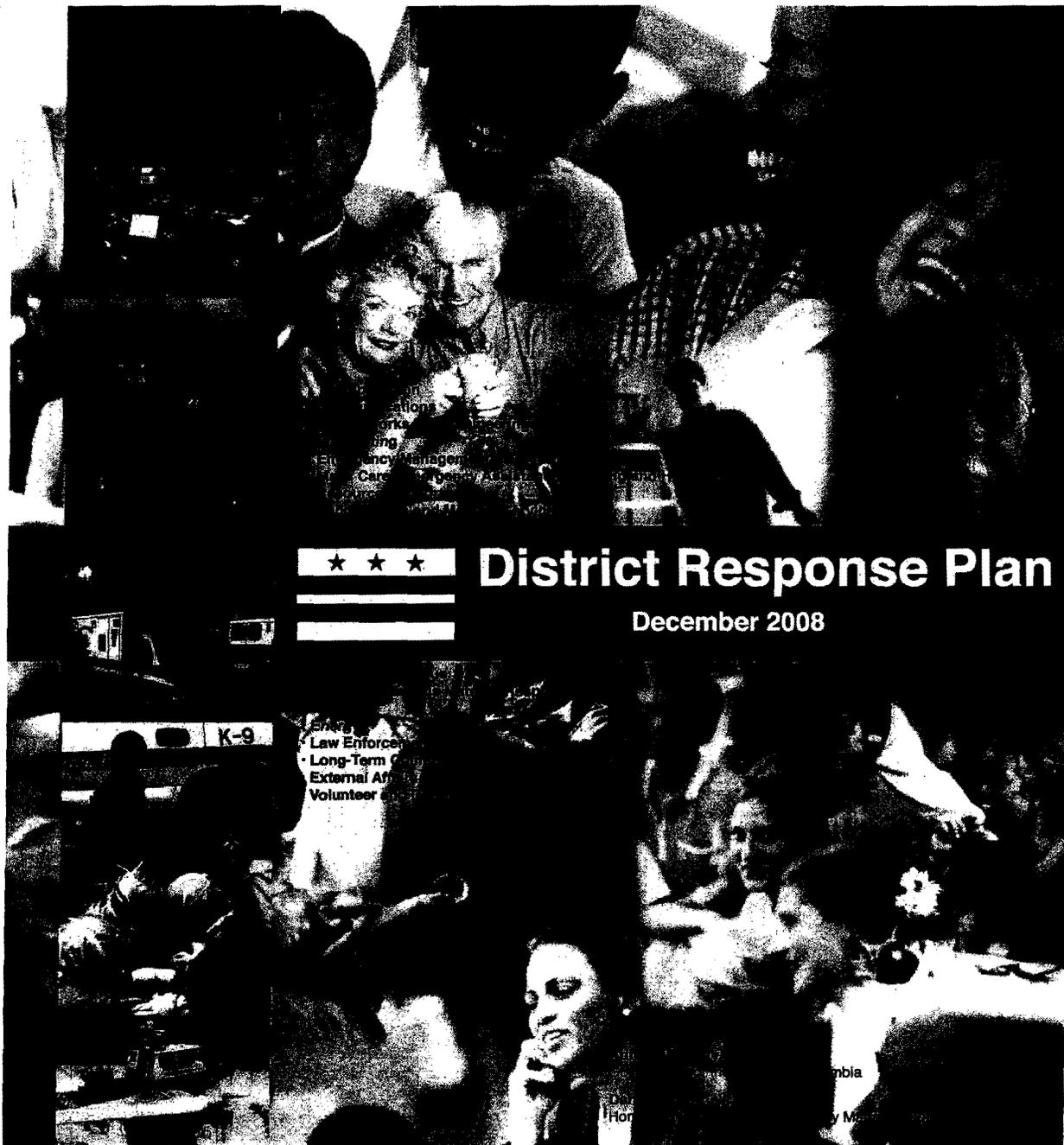
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Dated: August 31, 2010

Formal Case No. 1082

Attachment I

**District Response Plan
(relevant portions)**



District Response Plan

December 2008

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Area
Law Enforcement
Long-Term
External Aff
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District of Columbia

District Response Plan

December 2008

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Foreword

The District of Columbia government is continuously working to protect our city from the range of hazards that threaten our residents, visitors, businesses, and the environment. Responding to emergencies resulting from these hazards poses challenges that cannot be adequately addressed within the routine operations of government.

To meet these challenges, the Homeland Security and Emergency Management Agency (HSEMA), working with key stakeholders, has created the District Response Plan (DRP). The DRP is a function-based plan that outlines the tasks that support emergency response in the District of Columbia and provides a framework for coordinating that response across District, local, and federal agencies.

The DRP is intended to be a “living” document and this is a newly updated version. The policies and procedures outlined therein are a result of lessons learned—at both the local and national levels—and reflect the U.S. Department of Homeland Security’s (USDHS) new National Response Framework (NRF).

The design and concepts of the revised DRP fundamentally have remained true to the original DRP, including the incorporation of the concepts and processes of the National Incident Management System (NIMS) and the NRF.

The DRP will continue to remain dynamic and flexible as it changes and matures with each update. Each updated version will continue to reflect the knowledge gained from our experiences and lessons learned. The ultimate goal is to protect the public and respond efficiently and effectively to significant incidents that threaten life, property, public safety, economy, and the environment in the District of Columbia.

Adrian M. Fenty
Mayor
District of Columbia

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Base Plan

I. INTRODUCTION

The District of Columbia (District) is a unique governmental entity in the United States. It is simultaneously considered a city, a state, and a federal entity. Its capital city designation, along with the complex set of legal authorities associated with that designation, provides a distinct set of challenges in disaster response planning.

The District Response Plan (DRP) establishes the framework for the District's response to, recovery from, and mitigation of all hazards. The plan unifies and coordinates efforts of District agencies and departments, non-governmental and voluntary organizations, and regional and federal partners involved in emergency management with the goal of protecting life and property and ensuring public safety.

DC Facts and Figures

- 67 square miles
- 588,000 DC residents
- 5.3 million residents in the DC metropolitan area
- Seat of the federal government
- 45,300 businesses
- 12 colleges and universities
- Hundreds of museums, monuments, theaters, and attractions
- 4 military installations
- More than 15 million visitors annually

The DRP, which is designed to complement the federal emergency response structures as described in the January 2008 National Response Framework (NRF), organizes the District's agencies and departments that are involved in emergency management into functional areas according to capabilities, skills, resources, and authorities. Using this functional organization, the DRP outlines how resources will be leveraged and implemented and how federal, regional, private sector, and nonprofit partners will be engaged for support when necessary.

The DRP is organized into the following sections:

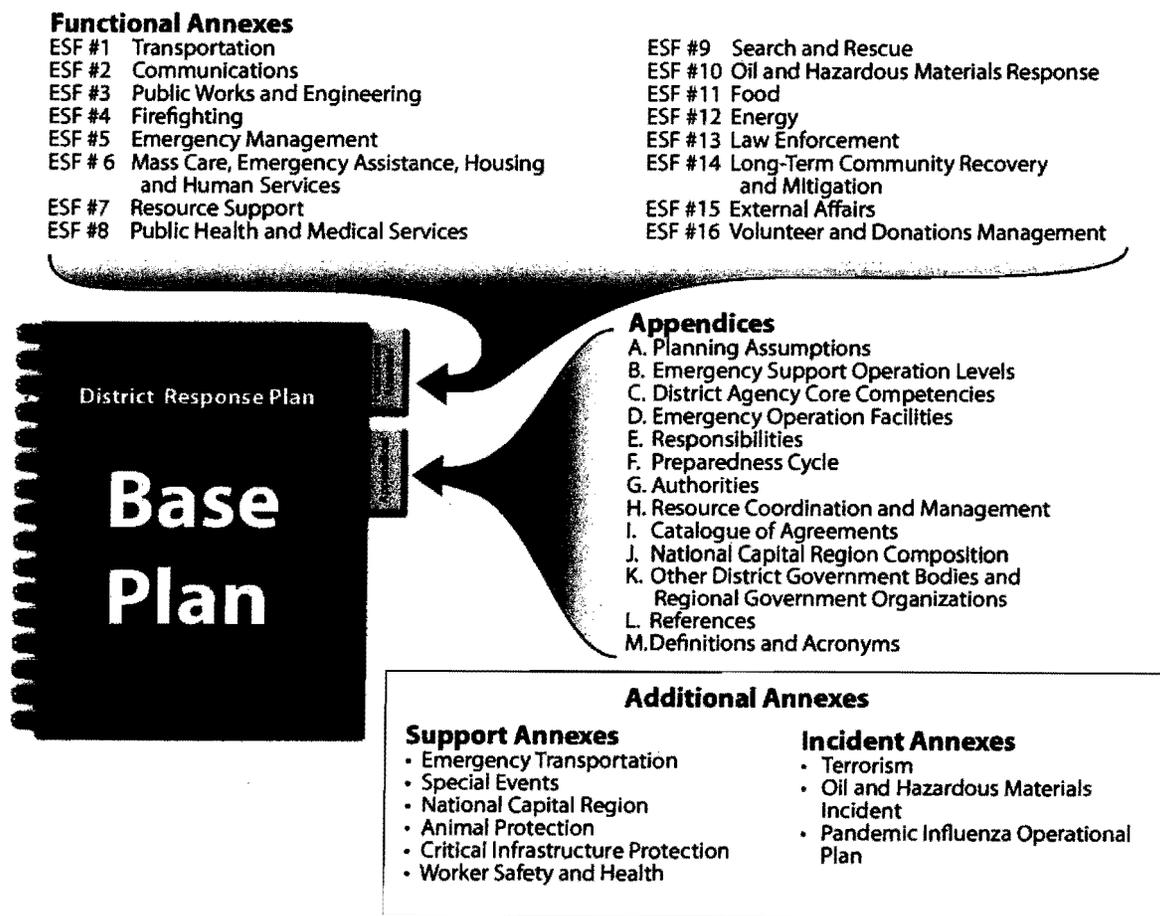
- The **Base Plan** and associated appendices contains sections that describe relevant policies, the concept of operations, roles and responsibilities, and the incident life cycle.
- The **Functional Annexes** organize the District agencies and departments into 16 Emergency Support Functions (ESFs, see *Figure 1: Organization of the District Response Plan*). Each of the ESFs describe the purpose and scope of each function, the operating policies, the planning assumptions, the concept of operations, and the responsibilities of the primary and support agencies.

- **Appendices** contain additional supporting information and references.

While not printed in the DRP, other documents are referenced and can be provided by the Homeland Security and Emergency Management Agency:

- **Support Annexes** provide information on common functional processes and administrative requirements necessary to ensure efficient and effective emergency management. The Support Annexes include: Animal Protection; Critical Infrastructure Protection; Emergency Transportation; Special Events; National Capital Region; and Worker Safety and Health.
- **Incident Annexes** provide information on contingency or hazard situations that require more detailed guidance from the DRP. The Incident Annexes include: Oil and Hazardous Materials Incident; Pandemic Influenza Operational Plan; and Terrorism.

Figure 1: Organization of the District Response Plan



A. Purpose

The DRP establishes the framework for District government entities to respond to, recover from, and mitigate an emergency in a methodical and efficient manner that protects life and property and ensures public safety. To meet this purpose, the DRP:

The District Response Plan provides the framework for how the District of Columbia will respond to, recover from, and mitigate an emergency.

- Establishes the concepts and policies under which elements of the District government will operate during an emergency;
- Sets forth lines of authority and organizational relationships, and focuses on measures that are essential for the protection of the public;
- Establishes a structure through which the District will implement notification and activation procedures for emergencies;
- Describes the roles and responsibilities of District agencies in executing the ESFs;
- Provides processes for the integration of ESF resources in a coordinated response effort;
- Coordinates response and recovery activities with volunteer organizations active in disasters, Neighborhood Services Coordinators, and the business community;
- Provides a framework for the District government to coordinate with regional jurisdictions;
- Addresses roles and relationships among District, regional, and federal agencies during emergencies within the District; and
- Addresses overlaps with other emergency response plans.

B. Scope

The DRP applies to all District departments and agencies as well as to Non-Governmental Organizations (NGOs) and private entities that may be asked to provide assistance in an emergency. (For the purposes of the DRP, any reference to District agencies includes District departments.) Additionally, other non-government or quasi-governmental organizations such as the DC Water and Sewer Authority, Verizon, American Red Cross, Potomac Electric Power Company, Washington Gas Company, District universities, and volunteer organizations, function as non-governmental support agencies in coordinating

response efforts in an emergency. The plan is structured so that District agencies can respond under individual agency authorities or as part of a functional team in a collaborative effort.

The DRP concepts apply to any emergency, disaster, catastrophe, or emergency situation where the health, safety, or welfare of persons in the District is threatened by actual or imminent consequences within the District from the following threats:

- Terrorist attack, sabotage, or other hostile action;
- Severe and unanticipated resource shortage;
- Fire;
- Flood, earthquake, or other serious act of nature;
- Serious civil disorder;
- Any serious industrial, nuclear, or transportation accident;
- Explosion, conflagration, power failure;
- Injurious environmental contamination that threatens or causes damage to life, health, or property; or
- Outbreak of a communicable disease that threatens or causes damage to life, health, or property. (DC Official Code § 7-2301(3)).

For coordination with the NRF, the DRP incorporates into its framework two definitions from the Robert T. Stafford Disaster Relief and Emergency Assistance Act (as amended, 42 U.S.C. 5121 *et seq.*):

The DRP takes an all-hazards approach to disaster response.

- **Emergency**—means any occasion or instance for which, in the determination of the president, federal assistance is needed to supplement state and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States.
- **Major disaster**—means any natural catastrophe (including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought), or, regardless of cause, any fire, flood, or explosion, in any part of the United States, which in the determination of the president causes damage of

sufficient severity and magnitude to warrant major disaster assistance under this Act to supplement the efforts and available resources of states, local governments, and disaster relief organizations in alleviating the damage, loss, hardship, or suffering caused thereby.

The DRP takes an all-hazards approach to disaster response. Regardless of the emergency, the DRP structure enhances the District's ability to collaborate with federal response partners by aligning with federal emergency response directives and plans. Examples of directives are Homeland Security Presidential Directives (HSPD), such as HSPD-5, Management of Domestic Incidents. Plans include the NRF, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and other national security emergency program plans and initiatives.

Regional Response Implications

While the DRP focuses on the coordination and capabilities of District government agencies, it also recognizes that few actions are taken by the District in major disasters operations that do not directly or indirectly impact its regional partners (*see Figure 2: Regional Map of the National Capital Region*). The DRP is intended to address the functional interaction with jurisdictions outside of District boundaries, especially in the areas of communications, public information, transportation, public safety, health, schools, and utilities.

Figure 2: Regional Map of the National Capital Region



DRP Relationship to Other Plans

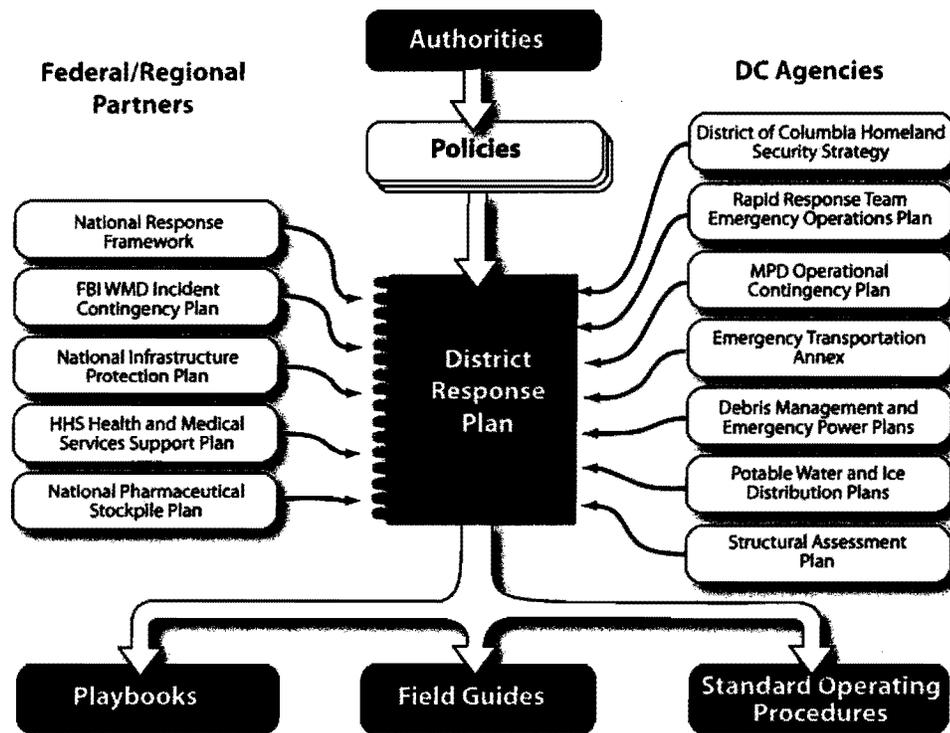
The combined emergency management authorities, policies, procedures, and resources of the District, regional partners, federal government, and other entities (e.g., international organizations, voluntary disaster relief organizations, and the private sector) constitute an intergovernmental emergency response network for providing assistance following an emergency.

Within this network, the District may provide personnel, equipment, supplies, and facilities; and managerial, technical, and advisory services in support of emergency assistance efforts. Various District, regional, and federal statutory authorities and policies establish the basis for providing these resources. A list of emergency response and recovery-related directives, together with a summary interpretation of each legal citation, has been compiled in *Appendix G: Authorities*.

The DRP may be used in conjunction with partner state and local plans, federal emergency operational plans developed under statutory authorities, and Memoranda of Understanding (MOUs) among various federal agencies. The DRP may be implemented concurrently with a number of federal and regional emergency operation plans (e.g., the NCP and the Federal Bureau of Investigation (FBI) Weapons of Mass Destruction Incident Contingency Plan; see *Figure 3: Relationship of the DRP to Other Plans*).

The DRP is supported by tactical policies and procedures (e.g., standard operating procedures), and District agencies with major operational roles also maintain operations plans specific to their agency's emergency response roles and responsibilities.

Figure 3: Relationship of the DRP to Other Plans



II. POLICIES

A. District Policies

The District of Columbia Public Emergency Act of 1980 (DC Official Code 7-2301 *et seq.*) authorizes the Mayor to:

- Establish a program of emergency preparedness that utilizes the services of all appropriate agencies;
- Set forth a comprehensive and detailed District state program for preparation against, and assistance following, emergencies and major disasters, including provisions for assistance to individuals, businesses, and affected areas within the District;
- Establish the Mayor's Emergency Preparedness Council (EPC);
- Join or enter into, on behalf of the District government, regional programs and agreements with the federal government, neighboring states, and political subdivisions for the coordination of emergency preparedness programs; and

- Issue an emergency executive order, when confronted by an emergency, to preserve the public peace, health, safety, or welfare of the District. The issuance of an emergency executive order may do the following:
 - Expend funds appropriated to the District government sufficient to carry out emergency service missions and responsibilities;
 - Implement provisions of the DRP, notwithstanding established operating procedures relating to the day-to-day responsibilities of public works, entering into contracts, incurring obligations, employment of temporary workers, rental of equipment, purchase of supplies and materials, and expenditure of public funds;
 - Prepare for, order, and supervise the implementation of measures designed to protect persons and property in the District;
 - Require the shutting off, disconnection, or suspension of service from, or by, gas mains, electric power lines, and other public utilities;
 - Issue orders related to public utilities, hazardous materials, sales of goods and services, and curfews;
 - Establish emergency services units, as appropriate;
 - Expand existing departmental and agency units concerned with emergency services, as appropriate;
 - Exercise operational direction over all District government departments and agencies during the period when an emergency executive order may be in effect;
 - Take all preparatory steps, including the partial or full mobilization of emergency services units in advance of an actual event. Such programs can be integrated and coordinated with the emergency services plans and programs of the federal government and of the neighboring states and political subdivisions thereof;
 - Request pre-disaster assistance or a declaration of an emergency from the federal government, certifying the need for federal disaster assistance and committing the use of a certain amount of District government funds to alleviate the damage, loss, hardship, and suffering resulting from the event; and
 - Declare that response to lifesaving and life-protecting requirements under the DRP has precedence over other District response activities, with possible exceptions in cases of national security.

Under DC Official Code sec. 7-2201 *et seq.*, Civil Defense Declaration of Intent, the District of Columbia HSEMA has been delegated primary responsibility for coordinating District emergency preparedness, planning, management, and disaster assistance functions.

B. Federal Policies

If the Mayor determines that assistance supplementing District capabilities is necessary, the Mayor may request that the president declare a major disaster or an emergency under the Stafford Act to engage supplemental federal assistance. If a joint Federal-District Preliminary Damage Assessment (PDA) finds that damages are of sufficient severity and magnitude to warrant assistance under the Act, the president may grant a major disaster or emergency declaration. *Note: In a particularly fast-moving or major disaster, the PDA process may be deferred until after the declaration.*

If an emergency involves an area or facility for which the federal government exercises exclusive or primary responsibility and authority, the president may unilaterally direct the provision of emergency assistance under the Stafford Act. If possible, he or she will consult with the Mayor.

Normally, federal assistance is provided to jurisdictions under the Stafford Act pursuant to a presidential declaration of major disaster or emergency (disaster declaration). However, federal disaster assistance may be obtained without a presidential declaration. The USDHS/Federal Emergency Management Agency (FEMA) may place liaisons in an Emergency Operations Center (EOC)—a central facility for command and control of emergency operations—and move commodities to sites near an incident prior to a declaration. Federal departments and agencies may provide immediate lifesaving assistance under their own statutory authorities without a formal presidential declaration. Also, under other multiagency federal response plans, the federal government may provide assistance in unique situations where there is federal cognizance, such as under the National Contingency Plan and the National Response Framework.

C. Authorities

There are several authorities that provide the legal basis for the District's emergency management efforts, including this DRP (see *Appendix G: Authorities*).

III. CONCEPT OF OPERATIONS

A. General

District agencies respond to a large number of emergencies on a daily basis. Normally, emergencies are handled by agencies using established, traditional protocols and policies that guide them through the response. As the magnitude of an emergency increases, the requirement for non-traditional support also increases, resulting in the need for additional resources and personnel from the District. The District's process for coordinating resources and managing an emergency is described in *Appendix H: Resource Coordination and Management*.

The District will manage the response to emergencies using the DRP Base Plan and the Functional Annexes. During a response:

- The District's Consequence Management Team (CMT)—a central operational organization led by HSEMA, composed of liaison officers of all District ESFs as well as liaisons from all other organizations that are engaged or have potential roles in coordinating the response to an emergency—is activated as warranted by the level of an emergency (see *Appendix B: Emergency Support Operation Levels*). The CMT provides guidance and overall management for District response operations;
- Command of departments or agencies involved in emergency management is not altered by an event unless the Mayor declares otherwise;
- Each department or agency director is in command of the overall operation of his or her organization;
- Use of mutual aid agreements for cooperative response will be entered into and maintained with adjoining political subdivisions for the purpose of reciprocal assistance in the event of emergencies. HSEMA will maintain these mutual aid agreements;
- Normal communications and reporting channels will be used to the maximum practical extent possible. Emergency communications systems will be fully operational and will be used in the event that commercial communications systems are disrupted, saturated, or otherwise unavailable for security purposes;
- District agencies will employ their standard business continuity and business resumption planning principles to ensure the continuity of essential services; and

- Day-to-day functions that do not contribute directly to the operation may be suspended for the duration of the emergency. Efforts that would normally be required of those functions will be redirected to accomplish the emergency task.

In the event that District resources and capabilities are exceeded, the District may call upon neighboring jurisdictions to provide mutual aid in accordance with standing agreements (see *Appendix I: Catalogue of Agreements*). The District also may call upon the federal government to provide supplemental financial or physical resources necessary to deal with the overall impacts of an emergency, as described in the section above. The combined resources of the District, its partners, and the federal government represent a standardized emergency response system able to respond to any emergency.

NIMS and ICS

Recognizing the need for a standardized emergency response system, the DRP adopts the principles of the National Incident Management System (NIMS) and the Incident Command System (ICS). As designed by HSPD-5, NIMS is a consistent, nationwide approach for federal, state, tribal, and local governments to work effectively and efficiently together to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity.

ICS can be used in any size or type of emergency to control response personnel, facilities, and equipment. ICS principles are inclusive of common terminology, modular organization, integrated

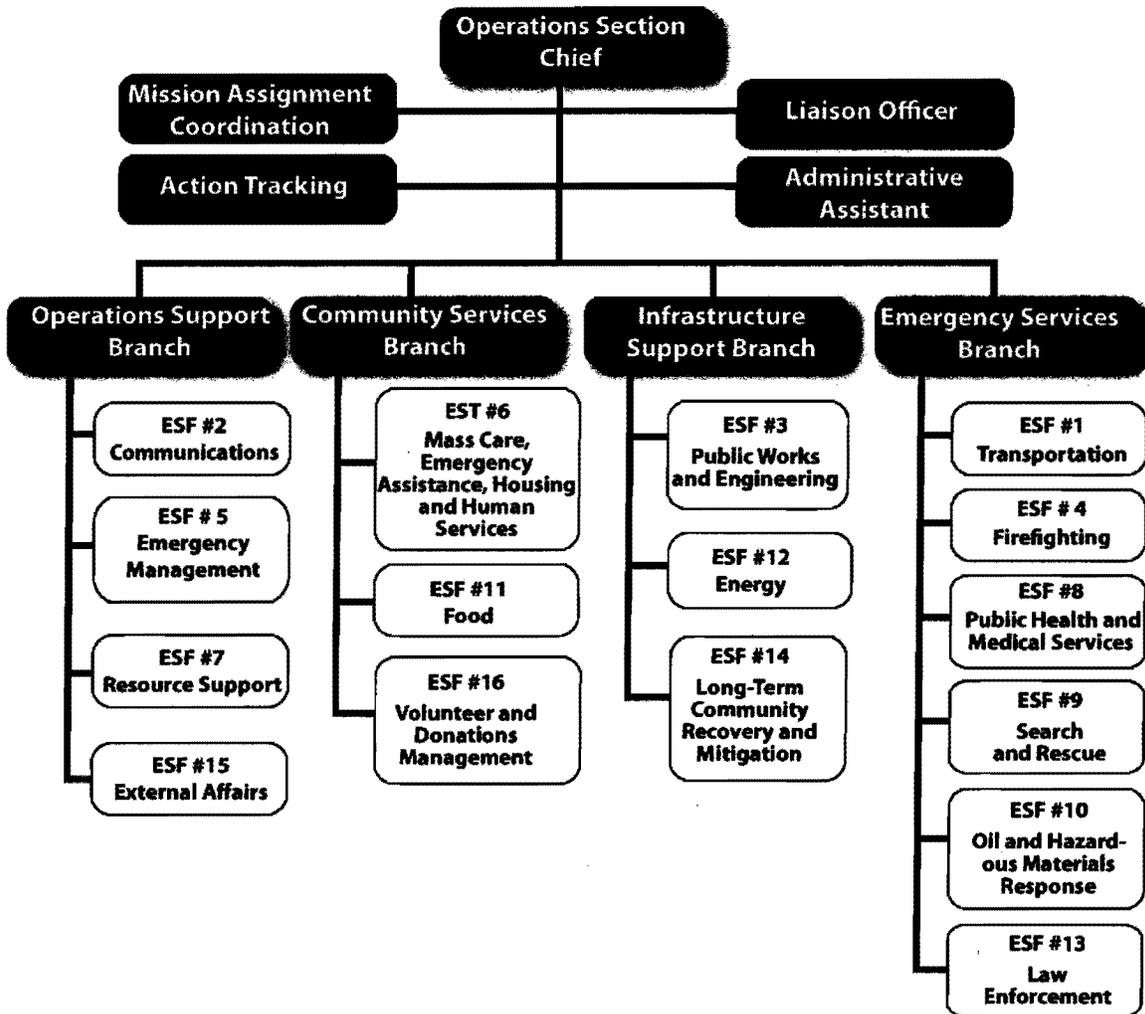
communications, unified command structure, action planning, manageable span-of-control, pre-designated facilities, and comprehensive resource management. The basic functional modules of ICS (e.g., operations, logistics, etc.) can be expanded or contracted to meet requirements as an event progresses.

The District Response Plan adopts the principles of the National Incident Management System and the Incident Command System.

The CMT organizational structure is based on ICS and employs the principles of unified command when organizations with parallel and overlapping authorities are operating in the District's EOC, located at 2720 Martin Luther King Jr. Avenue, SE.

The structure of the District's EOC parallels the USDHS/FEMA Regional Response Coordination Center (RRCC) and the USDHS National Response Coordination Center (NRCC). This allows clear paths of communication between these organizations as well as between responders at the local, regional, and federal levels. Most important is having coordination among the federal and District ESF agencies (see *Figure 4: Emergency Operations Center Operations Section Organization* and *Figure 5: Consequence Management Team Structure*).

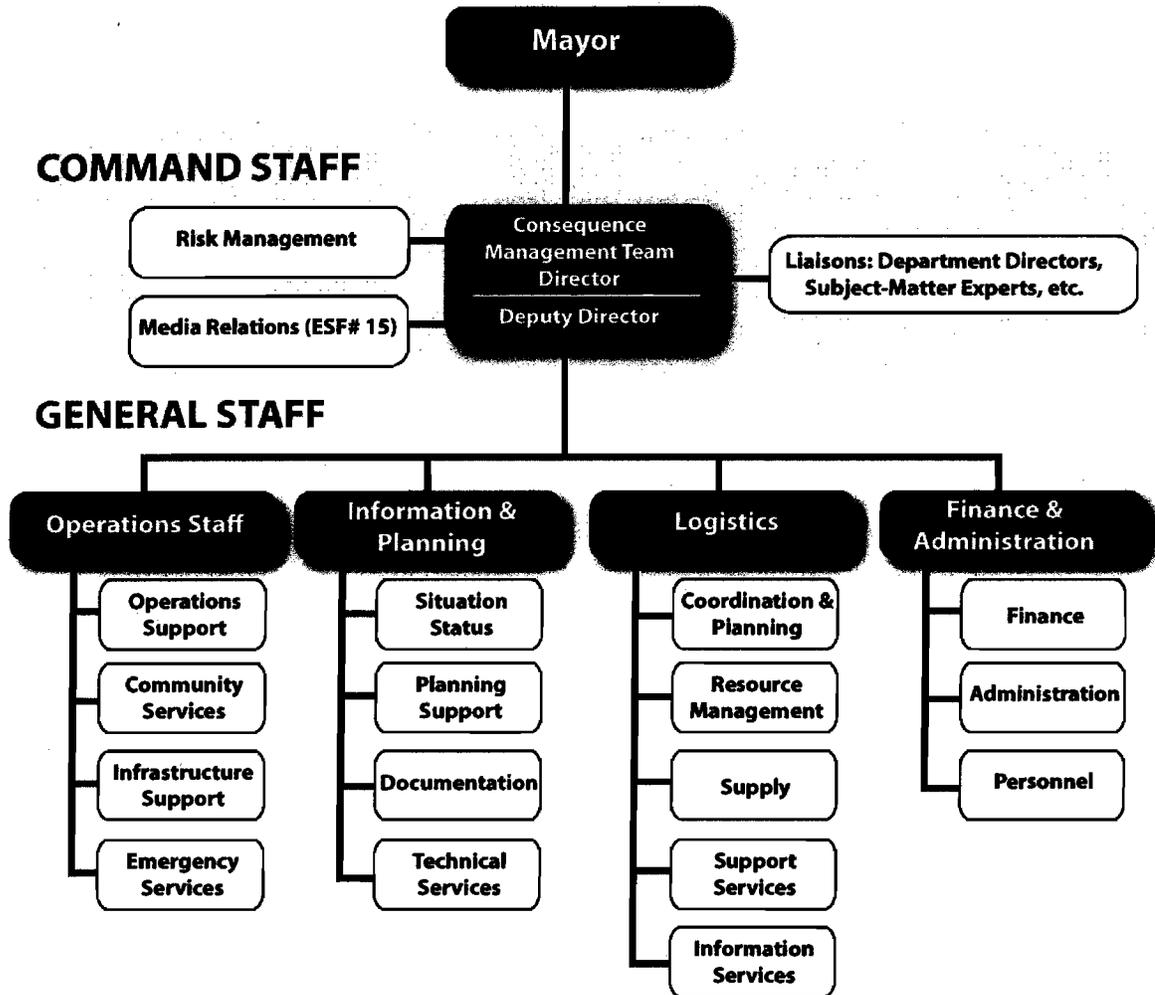
Figure 4: Emergency Operations Center Operations Section Organization



B. Organizational Roles, Responsibilities, and Relationships

The Mayor, supported by the CMT, will lead and manage the agencies engaged in the emergency responses coordinated under this plan. The CMT is the primary body coordinating the response to emergencies and is composed of three major organizational groupings—Policy Group (Mayor), Command Staff, and General Staff (see *Figure 5: Consequence Management Team Structure*).

Figure 5: Consequence Management Team Structure



The Policy Group, led by the Mayor, provides overarching objectives and guidance to the team and receives situation reports from the Command Staff, permitting District leadership to have centralized control over team activities. The Policy Group also manages the Joint Information Center (JIC) through the Mayor’s Office of Communications.

The Command Staff is responsible for the overall management of the incident and they follow Policy Group guidance to formulate the prioritized activities that become the Incident Action Plan. Department Directors, subject-matter experts, and other liaisons augment the Command Staff.

The General Staff provide the tactical level activities during an emergency and follow the direction of the Command Staff. The General Staff has four sections that support emergency operations:

- The Operations Section is responsible for all activities focused on reduction of the immediate hazard, saving lives and property, establishing situational control, and restoration of normal operations.
- The Information and Planning Section collects, evaluates, and disseminates incident situation information and intelligence to Command Staff and the Policy Group, prepares status reports, displays situation information, maintains status of resources, and documents the Incident Action Plan.
- The Logistics Section supports logistics requirements needed to facilitate effective and efficient incident management across all specialties.
- The Finance and Administrative Section provides financial, reimbursement, and administrative service to support incident management.

Although the actions of emergency responders are centrally controlled, those actions are executed through District departments and agencies. The head of each District department and agency has a responsibility to its employees and to the public to prepare for potential hazards that might impact the District. Among those responsibilities are the execution of their mission under emergency conditions and the protection of employees in emergency situations.

The head of each department and agency of the District government has an implicit responsibility to employees and to the public to prepare for potential hazards that might impact the District.

Certain agencies have clearly identified missions and functions under the DRP in addition to agency-specific missions and functions. These agencies have been grouped into ESFs by the nature of the type of assistance they normally provide. When the Emergency Liaison Officers (ELOs) of these ESFs are co-located in the EOC, they are further grouped into sections that cluster similar functions in order to better coordinate the overall District response.

When the EOC is activated and the CMT is convened at HSEMA, agency heads are still responsible for executing their normal agency missions and functions with priority given to supporting the emergency missions of the District as defined by the CMT Director. Ordinarily, the Mayor delegates to the CMT Director the responsibility of managing the CMT, setting operational priorities, developing action plans, and providing general direction to the ESF agencies engaged in the operation. The CMT Director may be the Mayor or his designee, and is usually the Director of HSEMA.

ELOs augment the CMT by providing all of the key District emergency response functions in a single location under the direction of the CMT Director. ELOs provide significant subject-matter expertise to the CMT through positions placed under the Operations Section. They are organized into four branches as depicted in *Figure 4: Emergency Operations Center Operations Section Organization*.

The following individuals, positions, and agencies have emergency responsibilities in non-operational periods as well as in emergencies. Those responsibilities include the following:

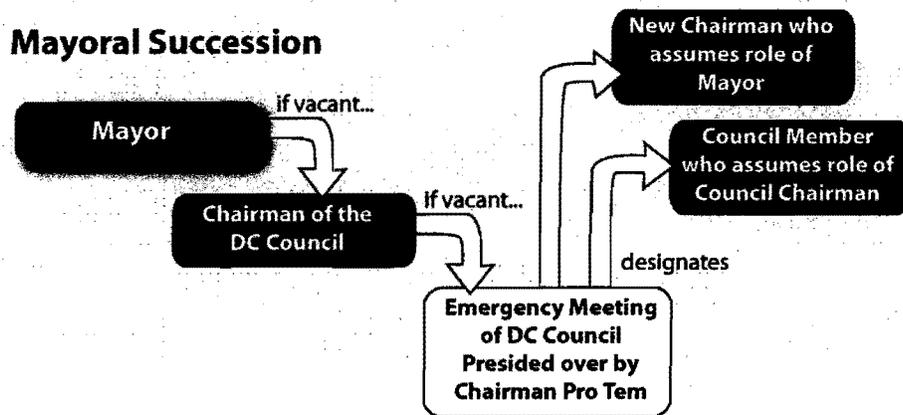
1. Executive Office of the Mayor

The Mayor is responsible for the overall preparedness of the District of Columbia government. As the Chief Executive, the Mayor provides leadership and direction in setting the vision, mission, goals, and objectives for the District emergency preparedness program.

In an emergency, the Mayor and staff assess the situation and determine the necessary level of response based upon the operational requirements and District government capabilities. The Mayor may choose to operate from the EOC together with the CMT, or he or she may delegate the direction of the CMT. The Mayor will declare a State of Emergency if required by the situation (*see Appendix G: Authorities*). The Mayor and mayoral staff will direct the District response using the DRP framework. Should the situation require the resources of the federal government, the Mayor may request federal assistance through the U. S. Department of Homeland Security under the provisions of the Stafford Act. The Mayor may call the president directly to request expedited assistance.

The District leadership structure establishes a line of permanent mayoral succession (*See Figure 6: Mayoral Succession of Power*). In the event of a mid-term vacancy of the Office of Mayor, as provided in the Home Rule Charter Act, the line of succession from the Mayor is to the Chairman of the DC Council. Should the positions of both the Mayor and the Chairman become vacant, the Chairman Pro Tem of the DC Council will immediately call an emergency meeting of the Council for the purpose of designating a Chairman, who then assumes the role of Mayor, and a Council member, who assumes the role of Chairman (D.C. Official Code 1-204.21(c)(2), as amended).

Figure 6: Mayoral Succession of Power



Additionally, there exists a line of interim governmental direction. As a matter of executive policy, the Mayor has designated the City Administrator (CA) to provide executive direction of the District government when the Mayor is outside of the District or otherwise temporarily unable to provide such executive direction. In the situation where neither the Mayor nor the CA is available, the Mayor's Chief of Staff will fill the role.

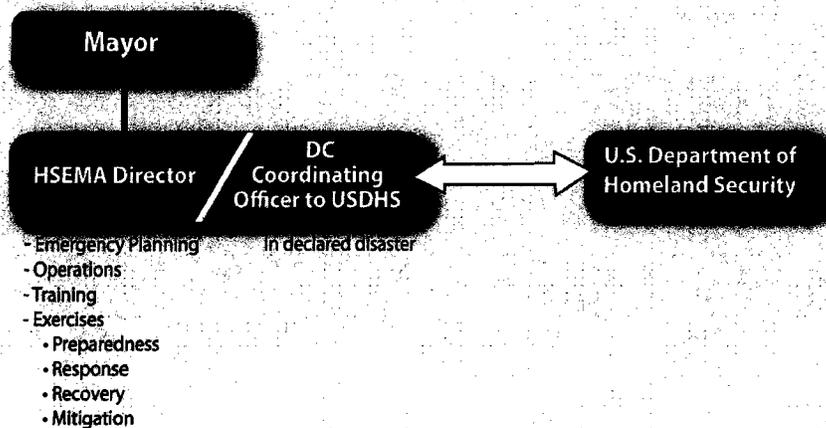
2. Office of the City Administrator

The CA oversees and coordinates District agencies for effective delivery of citywide services through government operations, customer service, managed competition service, and justice grant programs. In situations where the Mayor is absent, the CA will assume the responsibilities of the Mayor and may choose to operate at HSEMA with the CMT.

3. Homeland Security and Emergency Management Agency

HSEMA is responsible for the city's planning and emergency preparedness, response and recovery, and mitigation activities. The HSEMA Director chairs the EPC, which is the principal body that addresses DRP planning and implementation. HSEMA coordinates the city's response to emergencies, disasters, severe weather conditions, and other major events. The HSEMA Director is responsible to the Mayor for program management of all aspects of the District emergency management program. The HSEMA Director coordinates all emergency planning, operations, training, and exercises for preparedness, response, recovery, and mitigation missions of the District. In a declared disaster, the Mayor will appoint the HSEMA Director as the DC Coordinating Officer to represent the District in operational relationships with the U. S. Department of Homeland Security (See Figure 7: Designation of a DC Coordinating Officer).

Figure 7: Designation of a DC Coordinating Officer



The Director of HSEMA maintains the EOC on a 24-hour/7 days-per-week basis. In the event of a major disaster, the EOC may be staffed with a partial or full CMT composed of HSEMA, District, and outside agency ELOs necessary to effect centralized coordination of the overall operation. The HSEMA Director is responsible for the staffing and effective operation of the EOC and CMT, and for ensuring that alternate operating locations are available to continue organizational functions should the EOC become inoperable.

4. Emergency Support Functions

The DRP identifies 16 areas of functional responsibility, called Emergency Support Functions (ESFs). Each ESF is headed by a primary District agency designated on the basis of its authorities, resources, and capabilities in the particular functional area. Each primary agency is supported by an array of agencies that have similar functional roles and responsibilities. The primary and support agency designations are shown in *Appendix E: Responsibilities*.

In addition, each District ESF is partnered with the federal agency that leads the corresponding federal ESF under the National Response Framework. The DRP has an additional ESF #16, Volunteer and Donations Management, which corresponds to the Volunteer and Donations Management Support Annex in the National Response Framework.

District response assistance is provided using some or all District ESFs, as necessary. Through the application of ESFs, the DRP separates the types of direct District assistance that are most likely needed (e.g., mass care, health and medical services) as well as the kinds of operations support necessary to sustain District response actions (e.g., transportation, communications). ESFs are expected to support each other in carrying out their respective

missions. The primary agency may task support agencies if needed. Specific ESF missions, organizational relationships, response actions, and primary and support agency responsibilities are described in the Functional Annexes to the DRP following this Base Plan.

In cases where required assistance is outside the scope of an ESF, federal agency resources will be accessed in order to assist in the emergency operation. Requests for federal assistance from the District are channeled to the DC Coordinating Officer in accordance with the DRP and then to the Federal Coordinating Officer (FCO) or designee for consideration. The FCO is the primary federal official responsible for coordinating, integrating, and synchronizing federal response activities. Based on specific response needs, lead ESF agencies coordinate with their support agencies to provide the assistance required. Federal operational resources deploying to the field such as fire, rescue, and emergency medical responders are integrated into the ICS structure and will be available as resources to the incident commander. (*Appendix E: Responsibilities* provides a table and detailed list of ESF primary and support agency responsibilities.)

5. Agency Directors

Each District agency head must assess the mission-critical functions of the organization to ensure that those functions can be effectively executed in case of emergency. Each agency should have a plan for the protection of its employees in a wide range of hazards as well as a means to notify them of the status of operations of the agency in situations that might adversely affect them. Agency heads are responsible to support the provisions of the DRP and to anticipate potential support missions that might arise in emergency situations. Agency heads should create internal plans and procedures as necessary to ensure mission continuity and protection of employees.

6. Council of the District of Columbia

The Council of the District of Columbia is the legislative branch of the District government. All legislative powers are vested in the Council. It oversees the programs and operations of government agencies, including emergency preparedness. The Council proposes, considers, and passes legislation. Additionally, the Council approves the District's annual budget and financial plan and sets the revenue required to fund the budget. This includes those activities that support preparedness and operational capability of District agencies.

The Council is composed of 13 members, including a representative elected from each of the City's eight wards. Five members, including the Chairman, are elected at-large. The Council conducts its work through standing committees and it establishes special committees as needed.

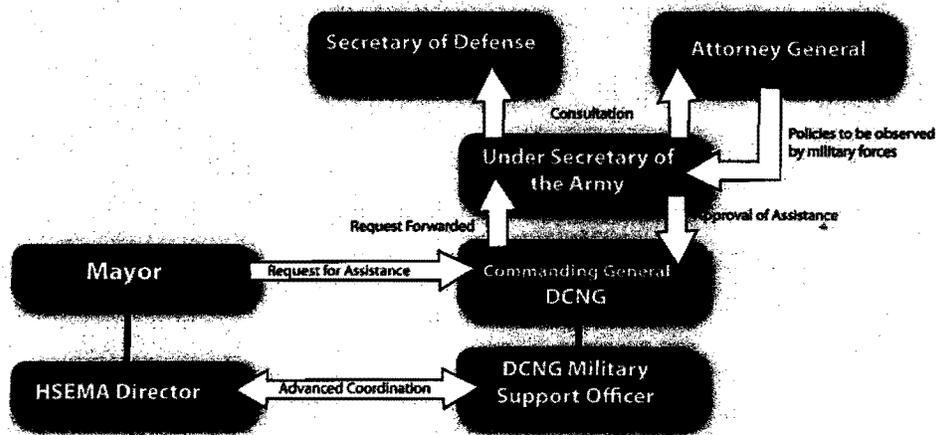
In an emergency, the Council’s standing committees conduct oversight hearings on the effectiveness of the government response, which could result in the enactment of new laws or appropriate funds to support the District operation. In addition, members assist citizens in accessing government services.

7. DC National Guard

The DC National Guard (DCNG) has personnel power and materials that may be used to support the District government during emergency operations, when requested through the appropriate military channels. The DCNG may provide support to a number of ESFs including: transportation; communications; medical resources; security; traffic control; mass care; and other operations.

When DCNG assistance is needed, the Mayor must coordinate the request through the Commanding General of the DCNG. The Commanding General notifies the Under Secretary of the Army of the request and its nature. The Under Secretary consults with the Attorney General and the Secretary of Defense on the request. The Attorney General establishes policies to be observed by military forces in the event they are used for Military Support to Civil Authorities in the District. If approved by the Under Secretary of the Army, the Commanding General advises the Mayor of the decision and commits resources as necessary to assist within the parameters established by the Under Secretary and the Attorney General. If advance coordination is possible, it should be coordinated by HSEMA with the DCNG Military Support Officer (See Figure 8: Activation of the DC National Guard).

Figure 8: Activation of the DC National Guard



8. National Capital Region Partners

The District must coordinate its preparedness activities closely with the Commonwealth of Virginia, the State of Maryland, and local jurisdictions that comprise the National Capital Region (NCR, see *Appendix I: National Capital Region Composition*). In addition, during an emergency, these entities may be requested to assist the District under the Emergency Management Assistance Compact (EMAC).

The NCR jurisdictions are operationally interdependent in many functional areas such as transportation, business, government, and workforce. There are as many or more plans than there are jurisdictions, and they must be compatible in order to be effective. The District encourages the promotion of common terminology and functional planning operating systems such as an incident management system and a functional response planning approach such as the DRP and the NRF. The DRP has been shared individually with all federal, state, and local partners within the NCR for review and input. This practice will be continued with each update.

9. Federal Partners

The District will maintain close coordination with its federal agency partners in non-emergency periods through HSEMA and each ESF primary agency. The District receives financial assistance from a number of federal grant programs that support District readiness for all hazards. Among those agencies with grant programs are the USDHS, FEMA, the U.S. Department of Justice, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency. These preparedness relationships, built over time between federal and District agencies, prove invaluable in an actual response operation.

Because of the large federal presence and the importance of the nation's capital, during a no-notice event, federal coordination will occur prior to a presidential declaration under the Stafford Act. The USDHS/FEMA Office of National Capital Region Coordination (ONCRC) serves as this federal coordination point, working with the National Response Coordination Center (NRCC) and the disaster operations directorate at FEMA headquarters, until such time as a federal coordinating officer (FCO) is on scene and a joint field office has been established.

Upon presidential declaration, the Mayor, the Director of FEMA Region III, and a representative in the federal government execute a Federal-District Agreement for a major disaster. The agreement provides the manner in which federal assistance is made available and contains the assurance of the Mayor that a reasonable amount of District government funds has been or will be expended in alleviating damage caused by the emergency.

The HSEMA Director or other authorized representative of the Mayor serves as the DC Coordinating Officer (DCCO, not to be confused with the Defense Coordinating Officer designated by the U.S. Department of Defense) who coordinates requests for federal assistance. The DCCO is the District's senior representative for purposes of requesting federal assistance from the USDHS under the provisions of the Stafford Act and he or she is specified in the Federal-District Agreement as the key agent for processing official requests for assistance under USDHS direction. The DCCO is normally located in the Joint Field Office during the early phases of an operation and works closely with the Federal Coordinating Officer, the senior federal representative.

In any emergency, the Director of FEMA Region III may direct federal agencies to utilize, donate, or lend their equipment and supplies to state or local governments for their use and distribution. The District will extend services, facilities, and personnel to the federal agencies as necessary without regard to normal working hours, holidays, etc. If emergency work is to be performed by federal agencies, the District will provide the federal government with unconditional rights of entry and an authorization for the work to be performed.

10. Military

Federal military assistance can be requested in accordance with the provisions of the First U.S. Army Military Assistance Plan (Short Title 1A-MAP, dated November 30, 1973). The Director of HSEMA coordinates all requests for such assistance with the Director of FEMA Region III and the First U.S. Army Headquarters. The regional Defense Coordinating Official (DCO) serves as the single point of contact for requesting assistance from U.S. Department of Defense (DoD). Mutual support agreements between the District and local military installations are coordinated and negotiated by the HSEMA Director.

The Joint Force Headquarters National Capital Region (JFHQ-NCR) is responsible for land-based homeland defense, defense support of civil authorities, and military incident management in the NCR. JFHQ-NCR command location for military civil support is at Fort McNair. During incidents of national significance, JFHQ-NCR can activate to provide appropriate levels of military support to save lives, prevent human suffering, or mitigate great property loss. Support is primarily land-based. Support may be in response to a planned event, such as security support during a presidential inauguration, or in response to a natural disaster, insurrection, or terrorist attack.

Requests for assistance that requires the use of military assets that cannot be provided directly by JFHQ-NCR Joint Task Force are elevated to and coordinated with U.S. Northern Command (USNORTHCOM).

USNORTHCOM possesses planning cells that will determine the best military asset available to complete the mission requirement. USNORTHCOM command and control agencies will coordinate use of the asset(s) with FEMA, JFHQ-NCR, and the Director of HSEMA.

C. Emergency Operations Teams

In addition to the groups previously mentioned, two additional teams provide emergency operations support. Those teams and their responsibilities are provided below:

1. Rapid Response Teams

When an incident occurs, District rapid response teams are deployed in order to assess damages and determine the immediate needs from the impacted area. The teams are generally composed of HSEMA, Department of Public Works, and other elements with field operating capability.

2. Joint Field Office Liaison Team

The Joint Field Office Liaison Team is composed of District representatives from HSEMA and District ESFs that deploy to the USDHS Joint Field Office in order to establish liaison between the District operations and the federal agency operations when there has been a disaster declaration by the president.

D. Integration of Response and Recovery

Following an emergency, immediate response operations to save lives, protect property, and meet basic human needs have precedence over longer-term objectives of recovery. However, initial recovery planning should commence at once and in tandem with response operations. Actual recovery operations will be initiated commensurate with District priorities and based on availability of resources immediately required for response operations. In recognition that certain response and recovery activities may be conducted concurrently, coordination at all levels is essential to ensure consistent District and federal actions throughout the emergency.

E. Mitigation Actions

Mitigation opportunities should be actively considered throughout emergency operations. Decisions made during response and recovery operations can either enhance or hinder subsequent mitigation activities. The urgency to rebuild as soon as possible must be weighed against the longer-term goal of reducing future risk and lessening possible impacts should another emergency occur.

IV. INCIDENT LIFE CYCLE

District agencies are prepared to take a variety of actions to respond to and recover from an emergency. These actions—ranging from initial notification of an emergency to preparation of a final after-action report—are summarized below. They are not necessarily in sequential order; some may be undertaken concurrently.

A. Initial Actions

Notification

- The HSEMA EOC will notify relevant agencies in accordance with its Emergency Response Notification Matrix. The matrix identifies key personnel and agencies that are notified during a confirmed or unconfirmed emergency that has affected or could affect the District.
- HSEMA contacts select regional and federal response partners based on the severity of the emergency and the potential for the incident to create an impact outside District boundaries.
- In a major disaster, the HSEMA Director notifies the USDHS/FEMA Office of National Capital Region Coordination, which is the DHS contact for the District during a major disaster.
- Following an alert relating to an emergency deemed significant by the HSEMA director, HSEMA convenes a conference call with the Mayor and key advisory personnel to discuss the situation and evaluate the City's operation level.
- CMT members may be notified to convene at HSEMA for an initial meeting, depending on the nature of the emergency. CMT members or alternates remain on call to meet at any time during the response.

Activation

- With an increase to Operation Level 4 or 5 (see *Appendix B: Emergency Support Operation Levels*), HSEMA informs ESF primary agencies that the CMT is being activated and provides a time for each activated ESF to report to HSEMA as part of the CMT.
- Primary agencies are responsible for activation of their support agencies if required.
- Agencies may activate their headquarters' EOCs to provide coordination and direction to their response elements in the field.

- The CMT assembles at HSEMA to assist in assessing the impact of the situation, collecting damage information, and determining requirements.
- The CMT briefs the Mayor or the Mayor's designated liaison officer at the EOC on the assessment of the situation. This information is evaluated to determine whether a State of Emergency needs to be declared.
- As set forth in the Stafford Act, the Mayor must seek a presidential declaration by submitting a written request to the president through the FEMA regional office. Both District and federal officials conduct a Preliminary Damage Assessment (PDA) to estimate the extent of the disaster and its impact. This may, but not always, be included in the declaration request. In this request, the Mayor certifies that the combined District resources are insufficient and that the situation is beyond their recovery capabilities. Following a FEMA regional and national office review of the request and the findings of the preliminary damage assessment, FEMA provides the president an analysis of the situation and a recommended course of action.
- The CMT Logistics Section supports the establishment of a Joint Field Office and mobilization center(s).
- The EOC coordinates District support of requirements until the DCCO assumes those responsibilities.
- The JIC is established, as required, to provide a central point for coordinating emergency public information activities.
- The CMT coordinates damage assessment and selection of locations for field facilities. It also coordinates mission assignments for direct assistance and procurement of goods and services.
- ESFs, under the direction of an incident commander, act quickly to determine the impact of an emergency on their own capabilities and to identify, mobilize, and deploy resources to support response activities in the affected area.

B. Continuing Actions

Response Operations

- The EOC augments the CMT to full operations with the addition of staff, including ELOs.
- The CMT is located at HSEMA and assumes command responsibility for coordinating emergency assistance by identifying needs and priorities.

- The ELOs in the EOC coordinate District assistance under their respective ESF missions. To the extent necessary and possible, they maintain contact with their regional and federal counterparts.
- The CMT Policy Group convenes as needed to address policy issues such as allocation of scarce District resources.
- The JIC conducts briefings for media, Neighborhood Services Coordinators, District Council Members, and Members of Congress and staff as appropriate.
- Working with environmental agencies, the District Environmental Officer identifies environmental and historic assets that might require consideration under the law as response and recovery efforts are implemented.
- Once immediate response missions and lifesaving activities conclude, emergency teams are demobilized and the emphasis shifts from response to recovery operations. During response operations, the CMT Information and Planning Section develops a demobilization plan for the CMT.

Operational Cycle

The decision-making process of the CMT is enhanced through an operational cycle of planning and execution, which ensures that incident action plans are developed and executed to achieve incident goals and objectives. The operational cycle may begin with the scheduling of a planned event, the identification of a credible threat, or with the initial response to an actual or impending event.

Whatever the cause, the operational cycle starts with guidance from the Mayor who provides clear strategic direction to the Command Staff. That direction is developed into a plan listing comprehensive, tactical objectives with a detailed analysis of the resources and support needed to accomplish tactical objectives by the Command Staff. This plan is called the Incident Action Plan (IAP) and is accomplished during each cycle of planning and execution. Typically, the operational cycle follows the shift cycle (8-hour or 12-hour shifts) so the plans of one shift are executed by the Operations Section and revised by the Information and Planning Section on the next shift.

IAP development follows five phases:

- Develop situational awareness and an understanding of the emergency;
- Establish incident objectives based on the understanding of the emergency and develop a strategy that tie objectives into an executable plan;
- Develop the IAP;

- Document and disseminate the IAP; and
- Evaluate and revise the IAP.

To accomplish this, the Information and Planning Section Chief conducts a planning meeting with the CMT Director, Command Staff members, the General Staff Section Chiefs, and appropriate technical specialists. During this meeting and based on strategic direction from the Mayor, control objectives are determined; policy, legal, and fiscal constraints identified; and emerging issues developed.

The Information and Planning Section Chief uses this information to prepare the IAP and to coordinate tasking for interdisciplinary “task groups,” who are charged with the resolution of problems that could interfere with the attainment of the objective. Task group assignments are given to either ELO members or ESF technical experts, depending on the complexity of the issue and availability of ESF technical experts. The Information and Planning Section conducts administrative oversight of the task groups.

Incident goals and objectives established by the Command Staff and implemented by the General Staff form broad guidance that continually changes based on the immediate priorities of the event. The IAP is used in directing CMT response operations by establishing priorities for ESF actions and providing “task group” solutions to execution issues.

Situational Awareness

Situational Awareness is the ability to identify, process, and comprehend the critical elements of information about what is happening as an event unfolds. From the CMT perspective, this means knowing: where emergency needs are greatest; what assets are needed; how to get assets into areas where they are needed; and what the status is of assets as they move on-scene and perform actions.

The ability to maintain situational awareness occurs through effective communication of event information from and to Mayor, Command Staff, and General Staff; ESF Primary and Support Agencies; and on-scene personnel. Situational awareness may be maintained and/or improved by:

- Following and completing actions specified in the IAP;
- Recognizing and making others aware when actions deviate from standard procedures;
- Monitoring the performance of immediate team members;

- Providing information in advance when possible;
- Identifying potential or existing problems;
- Continually assessing and reassessing action plan progress as it relates to Policy Group objectives;
- Updating information on WebEOC (a Web-enabled crisis information management system) and on Regional Boards; and
- Clarifying expectations and outcomes with other team members.

Documenting Actions

The documentation of actions is paramount to effective communications. Individuals with emergency event information can use this information to adjust their actions. When individuals input emergency event information into an information system (such as WebEOC), in an accurate and timely fashion, that information is available to every agency connected to the system. Accurate and timely documentation of event actions into information systems and situation reports provide all agencies involved in the event with the effective communication they need to maintain situational awareness.

C. Recovery Operations

- The CMT Operations Section is the central coordination point among District, regional and federal agencies, and voluntary organizations for delivering recovery assistance programs. The Community Services and Infrastructure Support Branches of the Operations Staff Section assess District recovery needs at the outset of the emergency and the relevant time frames for program delivery. The branches ensure that District agencies with appropriate recovery assistance programs are notified of the emergency event and share relevant applicant and damage information with all involved agencies.
- The DCCO determines the need for Disaster Recovery Centers in the emergency area. District agencies staff the centers with knowledgeable officials who provide recovery program information, advice, counseling, and technical assistance related to mitigation.
- The Community Services Branch of the CMT coordinates assistance programs to help individuals, families, and businesses meet basic needs and return to self-sufficiency.

- The Infrastructure Support Branch of the CMT coordinates assistance programs to aid the District government and eligible private non-profit organizations to repair or replace damaged public facilities.
- Community Services and Infrastructure Support Branches assist in: identifying appropriate agency assistance programs to meet applicant needs; synchronizing assistance delivery; and encouraging incorporation of mitigation measures where possible. Additionally, they track overall progress of the recovery effort, particularly noting potential program deficiencies and problem areas.

Stand Down

Once incident goals and objectives have been achieved and/or a centralized District coordination presence is no longer required, the CMT implements the demobilization plan to transfer responsibilities to recovery assistance program oversight and monitoring. Following complete demobilization, responsibilities shift back to individual agencies' District offices.

After-action Critique

Following an emergency, the DCCO submits an after-action report through the CMT Information and Planning Section to HSEMA, detailing problems encountered and key issues affecting District performance. Data from these issues and targeted reviews are analyzed and provided, as appropriate, to HSEMA management and to the EPC for consideration. After a major disaster or unique emergency operation, HSEMA may convene an interagency forum to identify lessons learned. Each District agency involved is encouraged to keep records of its activity to assist in preparing its own after-action report.

Emergency Support Function #12

Energy

Primary District Agency:	District Department of the Environment
Support District Agencies:	Department of Public Works District Department of Transportation Homeland Security and Emergency Management Agency
Other Support Agencies and Organizations:	Maryland Energy Administration Potomac Electric Power Company Public Service Commission Virginia Department of Mines, Minerals and Energy Washington Gas Company
Primary Federal Agency:	U.S. Department of Energy
Support Federal Agencies:	District of Columbia National Guard U.S. Department of Defense/U.S. Army Corps of Engineers

I. Introduction

A. Purpose

Emergency Support Function (ESF) #12—Energy helps restore the District of Columbia's (the District's) energy systems during and/or following an emergency. The District Department of the Environment (DDOE) is the primary agency in the District responsible for coordinating with all other governmental department response elements and utilities to restore the District's energy systems.

B. Scope

ESF #12 gathers, assesses, and shares information on energy system damage and estimates the impact of energy system outages/shortages within the District. The purpose of this ESF is to facilitate restoration of energy systems and fuel supplies¹ during and/or following an emergency. Power and fuel are critical to protecting lives and property and maintaining the continuity of the government,

¹ The Department of Public Works also has an emergency power support role. See ESF #3.

business, transportation, emergency services, and other critical infrastructures within the District.

ESF #12 agencies have a variety of assets and resources available to them to mitigate energy or hazardous problems. Damage to an energy system in one geographic region may affect energy supplies in other regions that rely on the same delivery systems.

The policies and responsibilities detailed in ESF #12 are supported by a number of subordinate plans that detail response timing and procedures. These subordinate plans include:

- Internal Operations Plans of DDOE; and
- Standard Operating Procedures of DDOE.

II. Policies

- A. The ESF #12 priorities will be to aid in the restoration of damaged energy systems.
- B. DDOE will assign an ESF Emergency Liaison Officer (ELO) to temporary duty at the Homeland Security and Emergency Management Agency (HSEMA) Emergency Operations Center (EOC) or other augmentation facility, as needed, to be a member of the Consequence Management Team (CMT).

III. Situation

A. Disaster Condition

An emergency, to include a fuel shortage emergency, may sever key energy infrastructure, constraining supply in affected areas and, most likely, adversely impacting adjacent areas, especially those with supply links to the directly affected areas. Such an event also could affect transportation, communications, and other infrastructure necessary for sustaining public health and safety. It also could affect continuity of government as well as a number of critical infrastructures within the District.

B. Planning Assumptions

1. There may be widespread and possibly prolonged electric power outages or interruptions.
2. There may be widespread and possibly prolonged disruption to the supply and distribution of natural gas.
3. Transportation and telecommunication infrastructures may be affected by a disruption in power.

4. Delays in the delivery of petroleum-based products may occur as a result of loss of commercial electric power.

IV. Concept of Operations

A. General

1. ESF #12 will consolidate utility reports, identifying the assessment of fuel and electric power damage, energy supply and demand, and estimates to repair such systems, as follows:
 - a. Coordinate closely with officials to establish priorities to restore critical customer facilities and coordinate the provision of temporary, alternate, or interim sources of emergency fuel and power; and
 - b. Obtain current information regarding damage to energy supply and distribution systems and obtain estimates for restoration.
2. ESF #12 will provide timely and credible energy supply assessments and restoration forecasts in times of disaster in coordination with the U.S. Department of Energy (USDOE).
3. ESF #12 will coordinate with technical experts on energy supply production and delivery to facilitate energy information exchange.
4. ESF #12 will coordinate with other ESFs in order to provide timely and accurate energy impact information and recommend options to mitigate impacts.
5. ESF #12 will provide an ELO to the HSEMA EOC during an emergency situation.
6. ESF #12 will attain information regarding energy impacts and provide input to situation and other reports through the EOC.
7. ESF #12 will coordinate among federal and mutual aid state officials and energy industries in the region regarding priorities to repair damaged energy systems.

B. Organization

DDOE will coordinate all ESF #12 activity. Because each support agency may be represented at the HSEMA EOC, ESF #12 will maintain 24-hour contact with those representatives, as necessary, at those locations for the duration of the emergency response period. Support agency representatives will have sufficient

knowledge of the capabilities and resources of their agencies, with appropriate authority to commit resources to the response effort.

If a presidential disaster declaration is issued, the ESF #12 Team Leader is the POC within the District and will represent this ESF in its dealings with the District of Columbia Coordination Officer (DCCO), who will issue requests for federal assistance to the Federal Coordinating Officer (FCO). After a mission assignment is issued by the U.S. Department of Homeland Security/ Federal Emergency Management Agency (USDHS/FEMA) to a federal ESF or agency, DDOE will coordinate the delivery of assistance for ESF #12. The ESF will have an ESF Liaison Officer present or available for duty at the Joint Field Office (JFO) on a 24-hour basis for the duration of the emergency response period.

C. Notification

1. The EOC will notify ESF #12 of the activation of the CMT. ESF #12 will then notify ESF#12 support agencies and appropriate officials by telephone, pager, and/or e-mail regarding the nature of the event and any potential ESF # 12 issue.
2. The ESF #12 Team Leader will attend any CMT meetings and be available, as necessary, for the duration of the initial response period.

D. Response Actions

1. Initial Actions

- a. Activate disaster response procedures.
- b. Send an ESF #12 ELO to the EOC.
- c. Coordinate with utility representatives to establish priorities to repair damage and communicate those priority facilities.
- d. Coordinate with utility representatives to identify government actions that will help obtain needed resources to repair or restore damaged energy systems.
- e. Use available information to determine the status and assess the energy impacts of the emergency, including public agency and government resources needed to respond.
- f. Coordinate with USDOE to access fuel supplies in the petroleum reserve, in the event of a fuel shortage.

- g. Provide periodic situation and any other reports to the EOC as directed by HSEMA.
- h. Receive and respond to requests for information from neighboring states, local governments, regional bodies, federal agencies, and industry.

2. Continuing Actions

- a. Serve as the focal point for receipt of reports on damage to energy supply and distribution systems and requirements for system restoration.
- b. Advise and assist industry, District, and local authorities on priorities and actions for energy restoration and supply.
- c. Locate fuel for transportation, communications, and emergency operations. Coordinate with the U.S. Army Corps of Engineers (USACE) and the District of Columbia National Guard (DCNG) for the transportation of that fuel.
- d. Coordinate the collection and reporting of energy supply information to the public.
- e. Recommend actions to conserve petroleum fuel, electric power, and natural gas, and to ration energy, as necessary.
- f. Monitor the fuel supply system in coordination with gas station owners and companies to ensure the District possesses and maintains adequate supplies.

V. Responsibilities

A. Primary District Agency

District Department of the Environment (DDOE)—As the primary District agency for ESF #12, DDOE gathers, assesses, and shares information on energy system damage and estimates on the impact of energy system outages within affected areas during plan activation. DDOE coordinates with all the support agencies to help facilitate the restoration of energy systems and fuel supplies following an emergency.

B. Support District Agencies

- 1. **Department of Public Works (DPW)**—DPW will provide generator fuel supplies as needed.

2. **District Department of Transportation (DDOT)**—DDOT will facilitate and coordinate in the restoration of damaged transportation infrastructure within the public right-of-way to reestablish utilities. DDOT will coordinate with PEPCO regarding down power lines caused by trees.
3. **Homeland Security and Emergency Management Agency (HSEMA)**—HSEMA provides the administrative and logistical mechanism through which ESF #12 interacts with the other ESFs in the EOC at a specified operating location.

C. Other Support Agencies and Organizations

1. **Maryland Energy Administration (MEA)**—MEA is the lead agency for Maryland for ESF #12. MEA may provide support as requested under the Emergency Management Assistance Compact (EMAC).
2. **Potomac Electric Power Company (PEPCO)**—PEPCO provides electrical services to the public and businesses of the District. PEPCO will ensure communications with the EOC and provide an ELO to the EOC to ensure effective communications and coordination of emergencies, specifically monitoring the power grid and its impact on the District. PEPCO will provide operational/restoration information reports on response activities to the EOC. Additionally, PEPCO will help HSEMA prepare an impact statement outlining the effects of a long-term power outage on government operations and on the potential threat to the health, welfare, and safety of citizens in the affected areas.
3. **Public Service Commission (PSC)**—PSC will provide emergency regulatory action as appropriate to facilitate PEPCO, Washington Gas Company, and any other suppliers under its mandate in the restoration of services to their customers.
4. **Virginia Department of Mines, Minerals and Energy (DMME)**—DMME is the lead agency for Virginia for ESF #12. DMME may provide support as requested under EMAC.
5. **Washington Gas Company (WGC)**—WGC provides natural gas to the public and business of the District. WGC will ensure communications with the EOC and provide an ELO to the EOC to ensure effective communications and coordination of emergencies, specifically monitoring the natural gas supply and its impact on the District. WGC will provide operational/restoration information reports on response activities to the EOC. Additionally, WGC will help HSEMA prepare an impact statement outlining the effects of a long-term natural gas outage on government operations and on the potential threat to the health, welfare, and safety of citizens in the affected areas.

D. Primary Federal Agency

U.S. Department of Energy (USDOE)—USDOE is the primary federal agency for ESF #12 and it will provide direct, technical, and other support and guidance to the District through its District counterpart, DDOE. In addition, USDOE will support the District in the event of a Weapons of Mass Destruction (WMD) incident. This USDOE support is outlined in Attachment J to the “National Capital Region Weapons of Mass Destruction Incident Contingency Plan.”

Upon a presidential declaration of an emergency or major disaster, under the authority of the Robert T. Stafford Disaster Relief Act as Amended, April 1999, federal agencies initially will operate out of the U.S. Department of Homeland Security (USDHS) National Response Coordination Center (NRCC). When the Joint Field Office (JFO) is established near the disaster area, ESF representatives that comprise the Emergency Response Team (ERT) will be in the JFO.

E. Support Federal Agencies

1. **DC National Guard (DCNG)**—DCNG will support the distribution of fuels and other services when requested and coordinated, as requested by HSEMA.
2. **Department of Defense/U.S. Army Corps of Engineers (DOD/USACE)**—In support of USDOE during a federally-declared disaster and as the coordinating federal agency for ESF #3, DOD/USACE will provide electrical generators and other support services as needed to supplement the District’s efforts in the temporary restoration of electrical service.

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APPENDIX A. PLANNING ASSUMPTIONS

The following planning assumptions were considered in the development of the District Response Plan (DRP):

- An emergency may occur with little or no warning, and may escalate more rapidly than District response organizations can support.
- An emergency may cause injury, possible fatalities, property loss, and disruption of normal support systems. A large number of casualties, heavy damage to buildings and basic infrastructure, and disruption of essential public services may overwhelm the capabilities of the District to meet the needs of the situation.
- Achieving and maintaining effective citizen and community preparedness reduces the immediate demands on response organizations. Public awareness and education programs are required to ensure that citizens will take appropriate advance actions to reduce their vulnerability, especially during the first 72 hours after an emergency.
- The District will request regional and federal assistance once it has used all its available resources, through mutual aid agreements with the Commonwealth of Virginia and the State of Maryland, and through requests to the federal government.
- If there is a terrorism incident in the District, the Mayor and the District government will coordinate directly with the U.S. Department of Homeland Security (USDHS), the U.S. Department of Justice, the Federal Bureau of Investigation (FBI) Washington Field Office, and other implicated federal agencies.
- The Emergency Operations Center (EOC) will activate and Emergency Liaison Officers (ELOs) will staff the EOC to manage emergency operations.
- The DRP anticipates communication and coordination among regional and federal partners in emergency management matters to ensure cooperation, partnership, and mutual consideration of neighboring governments.
- District agencies will respond on short notice to provide timely and effective assistance through the DRP structure. Advance planning for these efforts will be based on pre-identification of resource shortfalls and contingencies.
- Each District agency and volunteer organization will document and seek reimbursement, as appropriate, for expenses incurred during emergency operations.
- Each District agency will participate in the development of plans and procedures, training opportunities, and exercises in order to achieve and maintain a high state of readiness.

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APPENDIX B. EMERGENCY SUPPORT OPERATION LEVELS

The District has adopted five operation levels to classify the estimated impact of an emergency event on the operations of the District government. To determine an operation level, the Homeland Security and Emergency Management Agency (HSEMA) may make an initial determination of emergency event impact. As information about an incident is gathered and the situation is better understood, the level may be modified. The operation levels will dictate the protective actions and measures taken by District public safety agencies.

Operation Level 1

Level 1 is the nominal posture of District agencies as they carry out daily activities, in the absence of an emergency situation, to ensure readiness. During the course of normal operations, agencies are engaged in preparedness, training, and exercise activities to ensure continual readiness. Operations plans are reviewed and equipment is checked to ensure that everything is ready, should the need arise.

Operation Level 2

Level 2 is triggered by a potential or actual emergency requiring the coordinated response of select District agencies. HSEMA alerts those District agencies and Emergency Support Functions (ESFs) that would need to take action if the potential event escalates. Throughout this level, HSEMA provides regular status alerts on the threat. A Level 2 event would consist almost entirely of field operations and an onsite command structure. The Emergency Operations Center (EOC) is staffed with HSEMA personnel without additional ESF augmentation.

Operation Level 3

Level 3 is typically triggered by an emergency or threat that requires most or all District agencies to respond or prepare to respond for a localized event that threatens life or property. A Level 3 emergency or threat consists almost entirely of field operations and onsite command structure. HSEMA alerts those District agencies and ESFs that would need to take action if the emergency or threat escalates. Throughout this level, HSEMA provides regular status alerts. The EOC is staffed with HSEMA personnel without ESF augmentation.

Operation Level 4

Level 4 requires activation of those agencies within the Consequence Management Team (CMT) that are directly affected by the emergency. It is triggered by highly probable hazardous conditions and a strong potential for property damage or loss of life. A Level 4 emergency or threat could have regional implications and might stretch the District's resources. All ESF primary agencies are notified. The EOC is staffed with HSEMA personnel and the necessary ESF representatives.

Operation Level 5

Level 5 requires full activation of the CMT. It is triggered by extremely hazardous conditions that are imminent or occurring. All primary and support agencies under the DRP are notified. A Level 5 emergency is likely to have regional implications and will likely require a request for regional or federal resources to support the District's response. The EOC is fully activated with 24-hour staffing by HSEMA personnel and all necessary Emergency Liaison Officers (ELOs).

APPENDIX C. DISTRICT AGENCY CORE COMPETENCIES

Core competencies are functional areas of expertise that relate specifically to tactical operations managed by the Operations Section. Agencies have the authority to direct operations related to their core competencies at incidents. If more than one agency is capable of performing the same tactical operations, the agency assigned a core competency will give tactical direction, by the ranking officer, to other agencies performing operations within that competency. (See *Table C-1: District Agency Core Competencies.*)

Table C-1: District Agency Core Competencies

Fire and Emergency Medical Services (FEMS) Department
Fire Suppression
Pre-hospital Emergency Medical Care
Search and Rescue
Structural Evacuation
Chemical, Biological, Radiological, and Nuclear (CBRN) / Hazardous Materials Life Safety and Mass Decontamination
Arson Investigation (Cause and Origin)
Metropolitan Police Department (MPD)
Law Enforcement and Investigation
Intelligence Collection and Analysis
Crime Scene Processing/Evidence Preservation
Site Management
Perimeter Control
Traffic Control
Crowd Control
Site Security and Force Protection
Evacuation (Area and/or Law Enforcement Related)
Water Search and Recovery
CBRNE/Hazardous Materials Assessment and Investigation (Crime Scene/Terrorism)
Crush Investigation
VIP Protection
Arson Investigation (Major Case)
Department of Public Works (DPW)
Damage Assessment (Structural)
Building Re-occupancy (Structural)
Public Buildings: Infrastructure Assessment; Repair; and Reconstruction
Snow Removal Operations
Technical Debris Management Operations
Technical Stabilization, Remediation and Demolition
DC Water and Sewer Authority (DCWASA)
Environmental Monitoring, Sampling, Evaluation, and Analysis
Environmental Mitigation (Chemical)
Environmental Law Enforcement
Water and Wastewater: Infrastructure Assessment; Repair; and Reconstruction

Department of Health (DOH)
Disease Surveillance and Epidemiology
Public Health Orders, Clinical Guidance, and Risk Communication
Mass Prophylaxis/Vaccination
Laboratory Testing (Biological and Radiological)
Public Health Assessment
Environmental Mitigation (Radiological and Biological)
Animal-Related Surveillance and Vector Control
Mental Health Needs Assessment and Service Coordination
DC Housing Authority (DCHA)
Stabilization, Remediation, and Demolition
Tenant Relocation
Office of the Chief Technology Officer (OCTO)
Telecommunications: Infrastructure Assessment; Repair; and Reconstruction
Office of Property Management (OPM)
Fatality Management Operations
Homeland Security and Emergency Management Agency (HSEMA)
Interagency Coordination and Support
Department of Parks and Recreation (DPR)
Forestry
Parks: Infrastructure Assessment; Repair; and Reconstruction
District Department of Transportation (DDOT)
Bridges and Roadways: Infrastructure Assessment; Repair; and Reconstruction
Transportation Systems Management
Potomac Electric Power Company (PEPCO), Washington Gas Company
Electric, Gas and Steam: Infrastructure Assessment; Repair; and Reconstruction
Verizon
Telecommunications: Infrastructure Assessment; Repair; and Reconstruction

CERTIFICATE OF SERVICE

Formal Case No. 1082, In The Matter of the Investigation into the Distribution System Reliability Performance of the Potomac Electric Power Company in the District of Columbia

I hereby certify that on this 31st day of August, 2010, a copy of the "Motion of the Office of the People's Counsel for an Expanded Investigation and Hearings into the System Reliability and System Outage Response of the Potomac Electric Power Company" was served on the following parties of record by hand delivery or first class mail, postage prepaid:

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