

Utility Emergency Response Review  
Emergency Management  
Regulatory Review

## **The ICS Balancing Act: Emergency Plan Review and Upgrades in an Evolving Regulatory Environment**

### ***The Challenge***

Over a 15-month period spanning 2011 and 2012, the state of New Jersey experienced three unprecedented weather events that resulted in extensive devastation and extended outages for utility customers: Hurricane Irene (8/28/11); “Snowtober” (10/29/11); and Superstorm Sandy (10/29/12).

Following the first two events, the New Jersey Board of Public utilities (BPU) commissioned a third party consultant to review storm response by the state’s electric distribution companies and to make recommendations to insure better performance in the future. The consultant’s report was submitted to the BPU on August 9, 2012 and to the general public on September 5, 2012. Eighty four of the report’s 130 recommendations were subject to a four-month deadline. The objective was to quickly modernize the utility’s response to emergencies.

Then Superstorm Sandy hit. It was one of the largest and most devastating storms in U.S. history. It left more than 2 million New Jersey households without power.

Meanwhile, one New Jersey utility had created an internal task force to review and improve the way it responds to emergency events. In an effort to leverage broader industry experience that had been gained from similar initiatives, the utility engaged Davies Consulting to provide best practice expertise and to facilitate implementation of improvements. Davies Consulting worked collaboratively with the utility’s internal team to comply with the immediate BPU timeline and begin to implement long-term, sustainable change for the company.

### ***The Davies Consulting Approach***

- Reviewed the NJ BPU Order.
- Evaluated the 84 relevant BPU requirements and determine a plan for key deadlines.
- Determined the utility’s status according to the BPU requirements.
- Identified compliance gaps.
- Suggested changes to meet BPU directives and to upgrade the company’s procedures based on Incident Command System (ICS) principles.

In light of the BPU’s four-month timeline, Davies Consulting worked closely with the utility to weigh the impact of each requirement as well as what work could reasonably be completed in compliance with the

deadline. The utility and Davies Consulting determined that due to the complexity of some tasks, many could be started immediately and completed over multiple phases while some could be completed within the current schedule.

Davies Consulting was asked to focus on implementing Incident Command System (ICS) into the utility's Emergency Response Structure, updating its Emergency Response Plan to be ICS compliant, as well as developing and implementing an exercise to test ICS.

### **The Result**

- Davies Consulting developed a two-phased approach for upgrading the Emergency Response Plan.
  - Phase 1 (completed in 2013): modify existing procedures to achieve ICS compliance within BPU timeline.
  - Phase 2 (to be completed): develop an upgraded Emergency Response Structure centered on ICS principles.
- Completed Phase 1, achieving compliance with the BPU requirements and deadlines.
  - Utility implemented the recommended organizational changes and process development that incorporated ICS into the utility's existing Emergency Response Structure.
  - Davies Consulting assisted with technical review of the new and updated procedures to inform and lay the groundwork for Phase 2.
- The team conducted five tabletop exercises\* to test ICS functionality within Operations, Planning and Analysis, Logistics, and Communications departments.
- The team conducted one functional exercise\* to test ICS functionality and information flow between the departments.

\*Exercises simulate real-world scenarios in which employees must work with supporting departments in order to test the effectiveness of the interaction. This is a way to assess how the organization manages roles and responsibilities, processes and procedures, and information flow both within and among departments as well as between the company and its external stakeholders. The information gained will enable continuous improvement and readiness for the utility Emergency Response System.