

# PNM

## PNM Public Safety Power Shutoff Plan

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## TABLE OF CONTENTS

<b>1.0</b>	<b>Introduction.....</b>	<b>1</b>
	1.1 Scope.....	2
<b>2.0</b>	<b>Public Safety Power Shutoff Overview .....</b>	<b>3</b>
<b>3.0</b>	<b>Hazardous Fire Areas.....</b>	<b>5</b>
<b>4.0</b>	<b>PSPS Decision-Making Process.....</b>	<b>6</b>
	4.1 PNM PSPS Event Organization .....	7
	4.2 Awareness & Monitoring .....	7
	4.2.1 Cloudfire – Thresholds and Burning Conditions .....	9
	4.2.2 Indji Watch .....	9
	4.2.3 Red Flag Warning .....	10
	4.2.4 Daily Situational Awareness.....	11
	4.2.5 Real Time Observations .....	11
	4.2.6 Other Non-Weather Factors .....	12
	4.3 Notification & Coordination .....	12
	4.3.1 PSPS Communications .....	12
	4.3.2 Corporate Communications .....	13
	4.3.3 Customer Service .....	15
	4.3.4 Regulatory and Governmental Coordination.....	15
	4.3.5 Tribal Engagement Coordination .....	16
	4.3.6 Major Accounts.....	16
	4.4 Community Resource Centers.....	16
	4.5 Command and Control (Coordination & Collaboration, Planning Function) .....	16
	4.6 Decision and Execution .....	17
	4.7 Restoration and Feedback.....	17
	4.7.1 After Action Review .....	18
<b>5.0</b>	<b>Training, Exercises, Tabletops .....</b>	<b>19</b>
<b>6.0</b>	<b>Next Steps .....</b>	<b>20</b>

**LIST OF FIGURES**

Figure 1. PNM HFAs and Fire Weather Zones.....4  
Figure 2. Integrated Decision Components .....6  
Figure 3. Potential PSPS Event and PNM Situational Awareness and Actions.....8  
Figure 4. A 14-day Indji Watch Forecast - Bosque MET Station..... 10

**LIST OF APPENDICES**

Appendix A – Hazardous Fire Areas – Detailed Maps

## ABBREVIATIONS AND ACRONYMS

AAR	After Action Report
ABQ	Albuquerque
API	Application Programming Interface
CRI	Combined Risk Index
CMR	Crisis Management and Resiliency Team
DOC	Distribution Operations Center
EOC	Emergency Operations Center
ERC	Energy Release Component
FAA	Federal Aviation Administration
FWW	Fire Weather Watch
FWZ	Fire Weather Zones
GACC	Geographic Area Coordination Center
GIS	Geographic Information System
HFAs	Hazardous Fire Areas
IC	Incident Commander
IPAWS	Integrated Public Alert & Warning System
IW	Indji Watch
HFAs	Hazardous Fire Areas
LMI	Low or Moderate Income
NFDRS	National Fire Danger Rating System
NMAC	New Mexico Administrative Code
NMPRC	New Mexico Public Regulatory Commission
NWS	National Weather Service
PNM	Public Service Company of New Mexico
PSPS	Public Safety Power Shutoff
PWOP	Power Operations
RAWS	Remote Automated Weather Station
RFW	Red Flag Warnings
SA	Situational Awareness
SCADA	Supervisory Control and Data Acquisition
SFDI	Severe Fire Danger Index
SWS	Special Weather Statements
T&D	Transmission and Distribution
U.S.	United States
USFS	United States Forest Service
VM	Vegetation Management
SVPNMO	Senior Vice President of New Mexico Operations
VSAT	Very Small Aperture Terminal
WHP	Wildfire Hazard Potential
WMP	Wildfire Mitigation Plan
WUI	Wildland-Urban Interface

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## 1.0 Introduction

In recent years, the western United States has seen an increase in damaging wildfire activity. Both climatologists and fire scientists anticipate longer fire seasons and more extreme fire behavior in future years. This new risk will require new coping strategies. Other important risk factors include human encroachment, historical land management practices, and the health of wildlands and forests.

Fundamentally, at Public Service Company of New Mexico (PNM), we are concerned with safety, the safety of everyone in our communities. Safety is at the heart of everything we do at PNM, and it is a core value that also extends to ensuring the safety of our customers. Wildfires pose a significant risk to the safety of our communities, and if we hope to have any effect on reducing both the risks and the potential impacts of wildfires, it will take the collective efforts of everyone in our communities working together. For these reasons, PNM has developed this plan to reduce wildfire risk, which will focus on how we think about a comprehensive wildfire mitigation strategy, along with a particular emphasis on the concept of a Public Safety Power Shutoff (PSPS) and how it is another tool to help ensure the safety of our communities.

To address the increasing severity and frequency of extreme weather events and increasing wildfire risk, PNM has a Wildfire Mitigation Plan (WMP) focused on situational awareness, field personnel safety practices and operational wildfire mitigation strategies to prevent the accidental ignition of wildfires. PNM's PSPS Plan (the Plan) is designed to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. The Plan is part of PNM's operational mitigation practices and supports customer and community safety. The Plan identifies the relevant considerations, process flow and implementation protocol before, during and after a PSPS event. The Plan is reviewed annually and updated as needed before the next wildfire season starts. Wildfire season varies throughout New Mexico but is generally considered to occur from April 1 through September 30. PSPS may be contemplated and initiated at any time of the year based on conditions described later in the Plan. While fire risk is heightened during certain times of the year, fire potential and its monitoring continues, year-round. Each of the five national forests in which PNM has infrastructure may restrict access at different times during the overall fire season or when fire conditions develop. PNM has reviewed industry best practices to inform this Plan and has also incorporated local community input.

The Key Objectives of this Plan include:

- **Safety:** Ensure the safety of the public and PNM employees, contractors, and Mutual Assistance employees.
- **Restoration Time:** Minimize the duration of an outage. Safety is the primary focus with an emphasis on Customer Service.
- **Mitigate Consequences:** Provide customer support to mitigate the impact of an outage, including coordination with Emergency Management Agencies to assure community resources are identified and available.
- **Information:** Provide accurate, timely, meaningful information to our customers, our employees, and other stakeholders.
- **Resources:** Effectively manage our human, equipment, material, and information resources to minimize restoration time and maximize productivity and performance.

This Plan is not intended to be aspirational, nor to address yet-to-be initiated projects or activities. Any forward-looking statements are not a guarantee of future performance or project initiation. Statements and details on PNM's PSPS are current as of its writing in May of 2024.

### **1.1 Scope**

This PSPS Plan identifies the relevant considerations, process flow and implementation protocol before, during and after a PSPS event. The Plan describes those planning steps, internal and external communications, and personnel readiness needed for the successful implementation of a proactive PSPS event. The Plan does not remove or replace existing field and operations authority or responsibility to de-energize systems or circuits consistent with evolving events or safety concerns.

A vital component in developing this PSPS Plan has been ongoing community input. PNM held several meetings in communities located within the Hazardous Fire Areas (HFAs) defined in **Section 3** and **Appendix A** to obtain input from first responders, emergency management personnel, local government and tribal officials, and others who provided comments and suggestions to improve the Plan. The community outreach sessions provided an opportunity for open and constructive dialogue about PNM's wildfire mitigation efforts. The community's perspectives and suggestions are crucial as PNM balances public safety with minimizing disruptions to our neighbors and communities. As discussed at each public meeting, these conversations were just the starting point, and we expect to continue to collaborate with potentially affected communities.



## 2.0 Public Safety Power Shutoff Overview

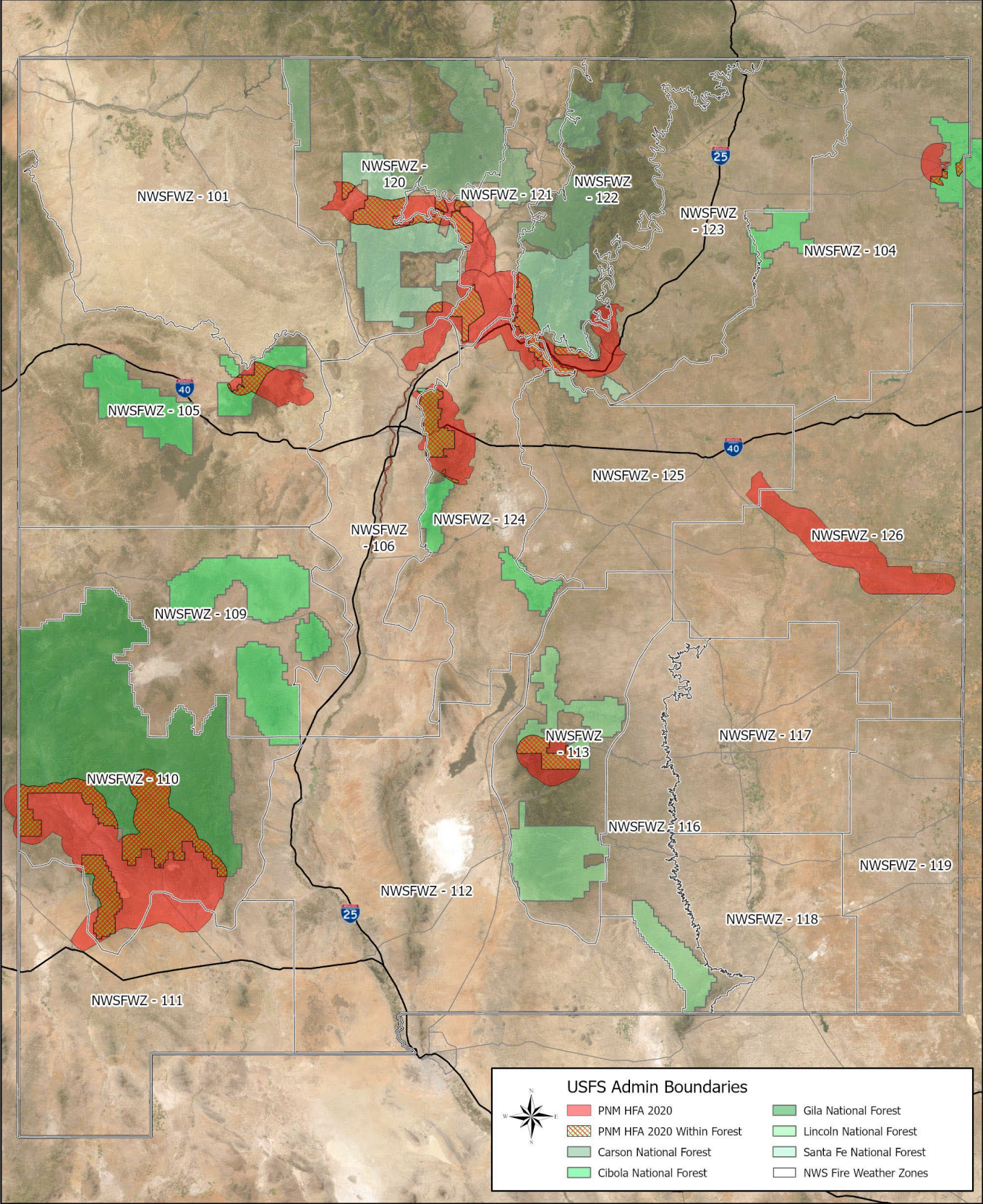
The PNM Public Safety Power Shutoff Plan is designed to proactively de-energize electrical facilities in identified areas of extreme wildfire risk to reduce the potential of those electrical facilities becoming a wildfire ignition source or contributing to the spread of wildfires. Based on the inherently disruptive nature of power outages, PSPS events must be carefully coordinated to balance wildfire risk with potential PSPS impacts on PNM customers and the communities it serves.

The unpredictable nature of wildfire and weather patterns create significant challenges with forecasting PSPS events. Real-time evaluations and decision-making are therefore critical in making PSPS determinations and, depending on the associated wildfire risk, those determinations may result in proactive de-energization in areas not originally anticipated.

PNM identifies operational practices specific to its Hazardous Fire Areas (HFAs) (see **Figure 1**). This PSPS Plan describes the coordination and processes, including operational and communication protocols, for implementation in these HFAs. The PSPS Plan will only affect PNM infrastructure located within PNM's HFAs, which are described in Section 5.0. They are also described in detail in the WMP. Detailed maps of PNM's HFAs can be found in **Appendix A** of this document.

A Public Safety Power Shutoff is considered only when weather and other risk factors combine, and fire potential exceeds thresholds that could indicate an extreme safety risk to customers and communities within designated HFAs. Environmental conditions could include wind, temperature, humidity, and fuel moisture content, which could increase the risk of utility-caused ignitions and wildfires. Other factors would also be considered in determining whether a risk of utility-caused ignitions and potential wildfires exist. This Plan also covers how PNM will communicate internally and externally as the plan is put into place.

Figure 1. PNM HFAs and Fire Weather Zones



### 3.0 Hazardous Fire Areas

PNM's Wildfire Mitigation Plan identifies HFAs where heightened wildfire risk and consequences exist within its service territory. These are areas where vegetation, terrain, meteorology, population density and the wildland-urban interface (WUI) increase the risks associated with utility-caused wildfire ignition. Detailed maps of each HFA are in **Appendix A**.

The HFAs were identified using the U.S. Forest Service (USFS) wildfire hazard potential (WHP) data, fire history, and PNM T&D assets. Most of the HFAs are in or adjacent to five of the National Forests in New Mexico. One exception is the Bosque HFA, running along the Rio Grande from south of Santa Fe to south of Belen, which covers the dense cottonwood forest along the river. The wildfire risk for all HFAs is reduced through methodologies described in PNM's Wildfire Mitigation Plan.

PNM will only initiate PSPS in these designated areas.

## 4.0 PSPS Decision-Making Process

PNM will initiate the PSPS decision-making process if PNM determines a combination of critical conditions indicate the PNM system at certain locations is at an extreme risk of being an ignition source, and forecasted conditions are severe enough for the rapid growth and spread of wildfire. **Figure 2** shows how PNM integrates all aspects of the decision-making process and summarizes the phased approach to making the decision to initiate a PSPS.

As wildfire potential becomes more extreme, PNM will receive emailed alerts from CloudFire, its external vendor providing supplemental situational awareness capabilities. This process is described in detail in **Section 4**. These alerts will initiate the staffing of an incident organization, “Event Organization” as described in **Section 4.1** below.

While we shut off power to protect public safety, we also recognize how losing power can disrupt lives and create its own safety risks. During the decision-making process, consideration of other impact(s) that PSPS could have on customers and Critical Facilities is weighed against the risk of wildfire during an extreme weather event.

**Figure 2. Integrated Decision Components**



To help us better assess the potential impact of a PSPS outage, we analyze the potential safety risk of turning the power off with the potential risk of wildfires that could occur on the circuits being considered for PSPS. The analysis uses safety as its primary driver. Customer reliability and other impacts are also considered when contemplating PSPS.

The Crisis Management & Resilience Team (CMR) will hold regular briefings during which PNM groups involved will discuss planning assumptions, forecasts, their actions, and preparations for possible de-energization and beginning plans for restoration.

As forecasted conditions approach the point that de-energization may be necessary, a recommendation to de-energize will be made in the formal Emergency Operations Center (EOC) setting and communicated to the Senior Vice President (SVP) of New Mexico Operations (NM Ops) who will issue the final order to de-energize service in the PSPS area. If the SVP of NM Ops is not available, the President and/or CEO of PNM will issue the final order.

## 4.1 PNM PSPS Event Organization

Initially during the lead-up to a PSPS event, a select group of PNM personnel will be involved as indicated in **Figure 3**. As time progresses and if the forecasted fire risks remain, more PNM personnel will become involved in the event's planning and eventual execution. An EOC will be opened, either physically or virtually, and an incident command structure will be set up for the event under the direction of the PNM CMR. The following PNM groups are typically involved during a PSPS event:

- Executive Leadership
- Wildfire Mitigation
- Crisis Management
- Operations
- Government Affairs
- Tribal Government Relations
- Corporate Communications
- Customer Service
- Regulatory/NERC Reliability Governance
- Risk
- Legal
- Line Department
- Drafting & Geographic Information Systems (DGIS)
- Safety
- Environment

## 4.2 Awareness & Monitoring

PNM uses meteorological consulting firms to perform weather monitoring services to provide forecast reports on HFAs and potential PSPS areas. These reports will guide PNM personnel as they monitor conditions and prepare for a PSPS event. Each consulting firm provides unique information useful in making PSPS decisions and is described in detail below. In addition to weather information, PNM monitors operational conditions of our systems and other events within our service areas, such as nearby fires or other emergencies.

Figure 3. Potential PSPS Event and PNM Situational Awareness and Actions

Decision Phase	Awareness and Monitoring		Notification and Coordination		Decision and Execution	Restoration and Feedback
Timing	7-10 Days Ahead First Signs	3-6 Days Ahead Monitoring	2 Days Ahead Communicating	1 Day Ahead Continue Monitoring and Communicating	Day of PSPS Power May Be Turned Off – Begin Restoration Plans	Restoration Patrol, Repair, Re-energize, Document
Situational Awareness	Strong winds appear in the long-range forecast and wind damage to the PNM electric system is possible.  Monitor Cloudfire and Indji Watch	Forecast still indicates winds may approach or exceed critical thresholds in the PNM Service Area.  Fire Weather Watches, Red Flag Warnings and High Wind Warnings are likely issued during this period.  This is often when this information makes its first public presence.  Note: These conditions can arise quickly and catch forecasters by surprise.	Forecast confidence increasing.  Red Flag Warning(s) for specific <b>Fire Weather Zones</b> are often issued by this time and important location and weather severity details are being refined.	Forecast confidence high.  Red Flag Warning details including affected Fire Weather Zones and Red Flag start/stop times should be issued by now.  NWS and GACC predictions should be in good alignment now.	Red Flag declared.  Predictive Service Area should indicate High Risk for Large Fire Potential.  Wind caused outages are likely. System health is closely monitored.  Field Observers report swaying lines, blowing debris and vegetation failure.	Red Flag expires.  Winds begin to decrease and are expected to remain below critical thresholds.  7-day Significant Fire Potential may remain “High Risk” even after expiration of Red Flag.
PNM Staff	<ul style="list-style-type: none"> <li>➤ Wildfire Manager</li> <li>➤ Distr. Ops Center (DOC)</li> <li>➤ Power Ops</li> <li>➤ CloudFire</li> </ul>	<ul style="list-style-type: none"> <li>➤ SVP NM Operations</li> <li>➤ Crisis Mgt. &amp; Resilience Team (CMR)</li> <li>➤ Corporate Communications</li> <li>➤ Physical or Virtual EOC</li> <li>➤ Safety</li> <li>➤ Vegetation Management</li> </ul>	<ul style="list-style-type: none"> <li>➤ External Affairs</li> <li>➤ Regulatory</li> <li>➤ Customer Service</li> </ul>	<ul style="list-style-type: none"> <li>➤ Field Ops/Line Dept (Field Observations, etc.)</li> <li>➤ Substations</li> </ul>	<ul style="list-style-type: none"> <li>➤ Risk</li> </ul>	<ul style="list-style-type: none"> <li>➤ Claims</li> </ul>
PNM Actions	Closely monitor changing conditions in forecast. Cloudfire and Indji Watch.  Other: NWS Fire Weather forecasts: <a href="#">Fire Weather ABQ</a> <a href="#">El Paso Fire Weather Page</a>  Predictive Service Area 7-Day Outlooks: National 7-Day Significant Fire Potential <a href="https://nwcg.gov">https://nwcg.gov</a>	Specific areas where <b>‘critical threshold wind speed exceedance’</b> are expected - do continuous monitoring.  Consult Cloudfire and Indji Watch for granular wind and weather forecasts.  PSPS event planning process should begin.  Begin monitoring PNM Service Territory here: <a href="https://inciweb.nwcg.gov">https://inciweb.nwcg.gov</a> for increased wildland activity from any cause.  Multiple uncontrolled fires burning simultaneously are one indicator that a PSPS decision may be imminent.	Service territory area expected to experience critical wind speeds refined & used in planning process.  <u>Preliminary notifications</u> begin for potentially affected customers and public officials.  Continue monitoring service area for uncontrolled wildland fires.  Pre-planning begins for the Restoration Team.	Additional messaging to affected customers and public officials. Coordination with first responders. Ready re-energization patrol plans. Continue monitoring service area for uncontrolled wildland fires.	<b>PSPS</b>  Winds are monitored by all available means.  Outages are monitored and used to inform PSPS decision.  Decision is made to initiate PSPS.  Notification to customers and public officials that power has been shut off.  PSPS information is distributed through various media outlets.  Conditions are monitored for improvement. Close contact is maintained with NWS and GACC.	Patrols are completed and necessary repairs made.  When safe to do so, power is restored.  Damage and repairs are documented.
PNM Staff is an additive process. Second column staff are added to the first column staff, and so on, as the days go by. As long as needed, staff increases each day or every few days.						

### 4.2.1 Cloudfire – Thresholds and Burning Conditions

CloudFire provides situational awareness and threshold alerting for PSPS consideration.

PNM has contracted with CloudFire to collect climatology data, review historic fire occurrences, and calculate thresholds for PNM PSPS use.

CloudFire gathered 10 to 20 years of climatological data including information on wind, temperature, and relative humidity.

Along with meteorological data, CloudFire collected and analyzed 10 to 20 years of burn environment data from National Fire Danger Rating System (NFDRS) indices such as Ignition Component, Spread Component, Energy Release Component, and Burning Index.

CloudFire used historic fire perimeter data in conjunction with the climatological and burn environment data to determine where and when fires of consequence have occurred in the past. PNM is using the results of this data and these thresholds to inform PSPS event considerations.

This research and analysis culminated in a “Composite Risk Index” (CRI).

The CRI has been incorporated into an online dashboard that will display a 6-day forecast for each PNM HFA. Also included in the dashboard are 6-day forecasts for the Energy Release Component<sup>1</sup> (ERC) percentile and Severe Fire Danger Index<sup>2</sup> (SFDI). Each of the three indices (CRI, ERC, SFDI) are color-coded for each forecast day for each HFA.

Alerts are emailed to a PNM distribution list when conditions requiring PSPS contemplation appear in the forecast.

Also included in the online dashboard are live, real-time meteorological and burn environment graphs:

- Fosberg Fire Weather Index
- Wind Gust Speed
- ERC Percentile
- Head Fire Flame Length
- Composite De-energization Index
- Firebrand Ignition Probability

PNM is working to make the dashboard available to local communities for their own monitoring of weather conditions.

### 4.2.2 Indji Watch

Indji Watch (IW) is a tool that provides natural hazard alerting services to PNM. It is a situational awareness tool that combines a Threat Window which lists NWS Special Weather Statements (SWS) and a dashboard with map-based visualizations of the same SWS.

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<sup>1</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5339121.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5339121.pdf)

<sup>2</sup> [Severe Fire Danger Index: A forecastable metric to inform firefighter and community wildfire risk management | US Forest Service Research and Development \(usda.gov\)](#)

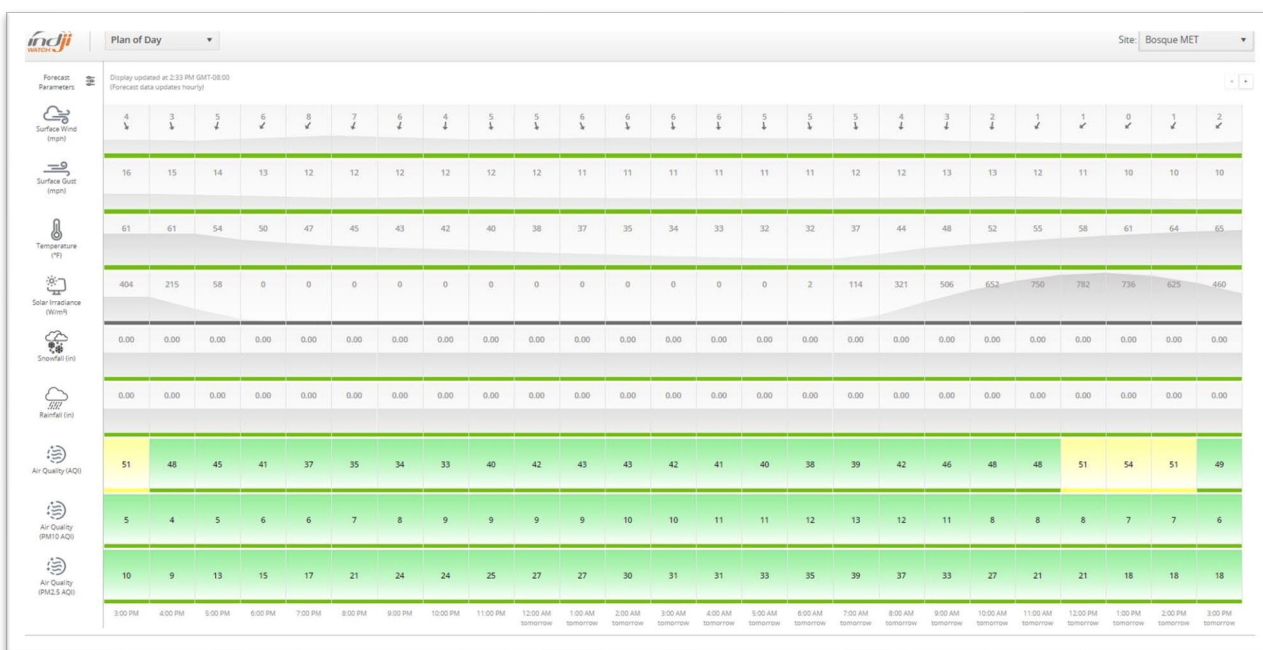
IW ingests PNM asset data and uses a Geographic Information System (GIS) as a basis for its service. When SWS affecting PNM assets or operating areas are issued by the NWS, IW populates the Threat Window and map dashboard.

Specific to PSPS situational awareness, PNM employees can log into the IW Client and view Red Flag Warnings (RFW) (and any other selected SWS alerts such as high winds).

PNM receives RFW alerts from IW and has created tools to forward them to affected field and system operations personnel. These may come via phone, emails, and texts.

PNM is also able to view customized 14-day forecasts at specified locations and can also view customized alerts up to 14-days in advance in Forecast Dashboards when wind speeds or other weather values reach PNM selected pre-set thresholds (see **Figure 4**). This is useful for providing long-range forecasts that might start the PSPS decision making process. Emails or SMS alerts will be generated up to 48-hours in advance for forecasted sustained winds or gusts that exceed thresholds and require broader awareness and urgency.

**Figure 4. A 14-day Indji Watch Forecast - Bosque MET Station**



### 4.2.3 Red Flag Warning

Though described here in detail, RFW does not necessarily mean a PSPS is imminent, nor is RFW a requirement for a PSPS decision-making process to be initiated. That said, an RFW is likely to be issued and in effect at the time the PSPS decision making process is started. A RFW is a forecast warning issued by the NWS to inform the public, firefighters, and land management agencies that conditions are ideal for wildland fire ignition and dangerous fire spread. RFWs are often preceded by a Fire Weather Watch (FWW), which indicates critical fire-weather conditions could occur in the next 12 to 72-hours.

The NWS has identified discreet Fire Weather Zones (FWZ) across the nation for providing weather alerts such as RFWs. These zones are shown on this NWS webpage: [Fire Weather](#).



There are 3 NWS forecasting offices that cover the PNM Service Area; Albuquerque, NM and El Paso and Midland, TX. These forecasting offices issue RFW only when dry fuels and low relative humidity combine with gusty winds to create the potential for extreme wildfire conditions. RFW thresholds are used by most NWS offices and can be found here: [Fire Weather Criteria](#)

#### **4.2.4 Daily Situational Awareness**

PNM receives a Daily Situational Awareness (SA) report prepared by a consulting firm with decades of experience derived from wildland fire control and utility SA development. The report is emailed to a distribution list of PNM personnel. The “Daily SA,” as it is called, assigns an Operating Condition of Normal, Elevated, or Extreme to each PNM HFA each day based on indices derived from the National Fire Danger Rating System. This publicly available data is the same data that is used by federal and other wildland firefighting agencies to make such fire business decisions as setting dispatch levels, staffing levels and determining area closures. PNM uses the data to inform field operations and system settings.

Information associating PNM HFAs to Remote Automated Weather Station (RAWS) and NWS FWZs is also included in the Daily SA report.

#### **4.2.5 Real Time Observations**

Real Time Observations can be from both public and privately- owned automated weather stations.

Public weather stations can be high quality and well maintained such as Federal Aviation Administration (FAA) certified airport weather stations while others may have less consistent data, communication, and maintenance such as those at schools or public buildings. The IW user interface provides immediate access to both high quality public and PNM-owned weather station data which is essential for real-time observations and verification of PSPS potential wind conditions.

Location is the key. PNM leverages data collected from weather stations co-located with PNM assets to understand the conditions experienced by assets in HFAs, and especially assets in heavy terrain areas.

Quality instrumentation, which should include the minimum parameters of wind speed, wind direction, temperature and relative humidity is ideal. Not all instruments are equal and verifiable, and data streams should be considered to balance accuracy of the data versus budget. Power and frequency of communication are also significant factors. While weather station observations could be delivered in averages and peak values per minute, or even sub-minute, the communication of the observed data, (i.e., wind gusts) may only be delivered every 5 or 10 minutes if the weather station is remote and relies solely on solar/battery power, or must communicate via radio repeater, Very Small Aperture Terminal (VSAT), or cellular. IW will provide visibility to PNM-owned weather stations through two additional interactive map layers which allow high level visibility to current wind speeds and temperatures at all weather stations. Each site can then be queried on the map to view all the current observations in direct relation to PNM assets. These observations in IW are made possible by integrating the weather station data through an Application Programming Interface (API) provided by EDM. EDM provided the original eleven weather stations to PNM. If a future weather station provider or utility provides a stable API for the weather station access, IW can integrate the data. Below is a list of the original EDM locations providing data.

#### 4.2.6 Other Non-Weather Factors

PNM routinely monitors a variety of factors including operational conditions of our systems, and other events within our service areas, such as nearby fires or other emergencies. PNM is also collaborating with communities to identify Critical Facilities in the HFAs to understand other community issues identified by: local communities, emergency responders, and other local, state, and federal government entities, which may factor into PSPS determination. Additional considerations may include but are not limited to: wildfire mitigation measures that have been deployed in an area, Critical Facilities within HFAs, availability of back-up generation supporting Critical Facilities, and customers with medical considerations, such as those with medical certification status on file with PNM.

### 4.3 Notification & Coordination

PNM moves into the Notification and Coordination Phase when the anticipation of extreme wind and existing mitigation in the forecasted area indicate that a PSPS should be considered for wildfire prevention.

The first, and defining action, of the Notification and Coordination phase to provide estimates on the start time, location, who could be impacted, and expected duration of the power shutoff. Restoring power is not always as simple as just turning power back on. Inspections and repairs of damage must be conducted before safely restoring power. PNM assesses each situation to determine the resources needed to expedite restoration, continually updating estimated times for power to be restored. Restoration is covered in more detail in Section 4.6, but restoration planning starts in this phase and is a part of the communication that our customers and stakeholders can expect.

#### 4.3.1 PSPS Communications

The size of PNM's service area, geographic and environmental diversity, and unpredictable nature of New Mexico weather create challenging conditions for rapid communications. The PNM PSPS Plan identifies critical stakeholders, actions, messaging, and communication channels to maximize PNM's reach to customers and communities in the event of a PSPS and integrates the following communications planning.

When possible, PNM will notify customers and local communities before, during and after a PSPS event, recognizing however, that some emergent situations may not allow for extensive or even any advance communications. PNM will utilize multiple tools to broadcast messaging on public safety while following operation protocols and required regulatory notifications. Some of these tools include:

- Text messages with expected timing and duration of the PSPS event (used for customers who opt-in to text communication)
- 24-hour call center
- Up-to-date information on a dedicated PNM PSPS webpage
- Media engagement with local TV, print and radio journalists
- PNM social media
- Post-action briefings to modify communication practices, as necessary

### 4.3.2 Corporate Communications

The PSPS Communication Plan provides guidelines for managing and supporting internal and external communication necessary before, during and after a PSPS event. All employees will be aware of the plan and their roles in implementation.

The communication plan specifically focuses on 1) safety, 2) wildfire impacts on PNM customers and on their electricity, and 3) calls to action for impacted and non-impacted customers.

#### During Non-PSPS Conditions

PNM will provide a proactive wildfire education and awareness campaign for PNM customers and HFA communities focused on wildfire prevention and mitigation, PSPS awareness and outage preparedness. PNM will utilize multiple tools and message points to support public safety and awareness.

Tools to include:

- PNM social media
- Wildfire safety customer website
- Mass media outreach via TV, radio, and print
- Customer newsletters and general communications
- Proactive engagement within PNM employees
- Local community outreach with first responders, customers and community members, regulators, elected officials, tribal leaders, public safety partners, critical facility operators and utility service providers

Key Messages:

- Preparedness is key:
  - create or update an emergency supply kit
  - identify three tiers of support
  - be familiar with community resources and emergency services
- PSPS Process
- Availability of outage information and updates

#### During Potential PSPS Conditions

If the PSPS is likely, PNM will implement its integrated PSPS communication plan using the tools referenced above as well as direct customer email, text and or phone call as available based on customer notification selections and capabilities leveraged through community partners.

PNM will communicate to our customers ahead of a potential PSPS to support their preparation and safety. Messages may include but are not limited to:

- Secure outdoor items: Safeguard your outdoor spaces by securing loose items such as patio furniture and garden tools. This prevents outdoor from becoming hazards or blowing into power lines. Move items indoors, if appropriate and possible.
- If applicable, unlock access gates to support PNM crews' ability to restore power.
- Allow PNM personnel access necessary infrastructure on/near customers' property.
- Avoid letting pets outside for extended periods of time and when they are outdoors, please keep them secure and safe.

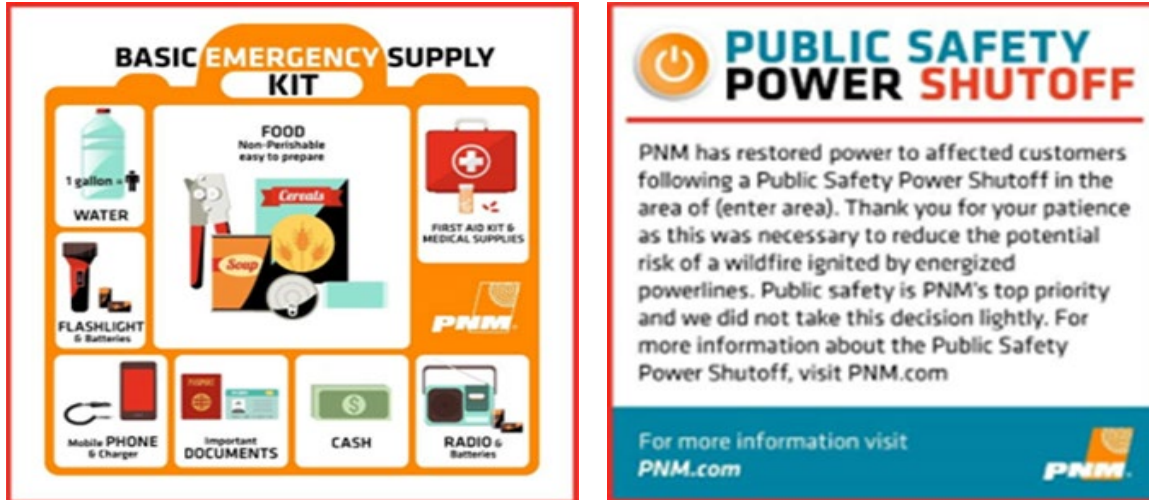
- Stay clear of downed power lines: Even if a downed line is not actively sparking, always assume it is carrying electricity and immediately call PNM at 888-DIAL-PNM.
- Use caution around power lines: avoid flying kites or drones or other aerial devices around power poles, overhead power lines, and substations.
- Report power outages: Wind and storms can blow branches, tarps, and trampolines into power lines, causing power outages. Never attempt to remove anything from the lines. Stay away and immediately report the outage by calling 888-DIAL-PNM.



*Example of PNM PSPS Website upon notice of potential PSPS*

#### **48-Hours and 24 Hours Ahead of Potential PSPS**

- The safety of our customers and local communities is paramount.
- Purpose of PSPS.
- Work with local entities to identify locations of Community Resource Centers.
- Communication with First Responders, Public Officials and Tribal Officials.
- Power outage preparedness to reduce potential impacts of a PSPS.
- Stay informed and check on your neighbors, friends and family who may be impacted.
- Frequent updates made available to customers via local media, PNM website, PNM social media and other tools to communicate extensively with potentially impacted customers and communities.
- Utilization of FEMA's Integrated Public Alert Warning System and Reverse 9-1-1 notifications, if available.



### 4.3.3 Customer Service

Although customers will be provided information through other outlets, PNM's Customer Service Call Center is a single point contact for PNM's customers. Customers contact the Call Center for a variety of reasons. In an emergency, Customer Service will take customer calls and enter them into operator logs, with additional input from voice recordings, electronic communications, and transcripts.

Although the Call Center's normal hours of operation are 7:30 A.M. to 6:00 P.M. Monday through Friday, in the event of a PSPS, the call center will be staffed 24-hours a day, 7-days a week, beginning the day before expected de-energization and then throughout the PSPS event. The 24-hours additional areas are implemented as necessary per the Call Center Emergency Response Plan.

PNM's Customer Service staff will assist in communication with residential and business customers in the affected area. This department will also assist with the identification of, and communication with, any vulnerable customers, including those customers dependent on medical devices.

iConnect is PNMR's Intranet site and is available to employees 24/7.

During a significant event, the Call Center Manager will work with the CMR and Corporate Communications to ensure that an effective communication strategy is implemented, and Call Center Representatives have information they can provide to customers who call in.

During a significant event, the Call Center Manager will work with the CMR and Corporate Communications to assure that an effective communication strategy is implemented, and Call Center Representatives have information they can provide to customers who call in.

### 4.3.4 Regulatory and Governmental Coordination

The Public and External Affairs Department will coordinate communications between PNM and Government Agencies during a PSPS event. External Affairs will work closely with PNM Regulatory, System Operations, Distribution Operations Center (DOC), and Corporate Communications to develop the scope and timing of and deliver the necessary communications to the appropriate government agencies to deploy available resources to assist the PNM restoration process.

### **4.3.5 Tribal Engagement Coordination**

PNM acknowledges the sovereignty of tribes and their rights to govern their lands. PNM's service territory includes two tribes in wildfire-prone areas, namely the Mescalero Apache Nation in Otero County and Tesuque Pueblo in Santa Fe County. PNM continues to address vegetation management annually with tribes with lands located in the Rio Grande Bosque.

As part of the PSPS notification strategy, tribal communities affected by the public safety notifications are included in the communication process. PNM's Tribal Government & Customer Engagement Department will engage with Tribal leadership through various means such as direct phone calls, emails, online meetings, and in-person interactions. Furthermore, PNM will collaborate with tribes to explore the option of alert systems notifications. Information sessions will be organized by the PNM Tribal Government & Customer Engagement team for Tribal leaders and key stakeholders. Their principal roles also include fielding customer calls from Tribal leadership and key stakeholders during PSPS events and communicating restoration information to impacted tribal leaders and tribal communities.

### **4.3.6 Major Accounts**

The PNM Account Management Team has the primary function of maintaining a clear line of communication between PNM and major industrial and commercial (I/C) customers. PNM Account Managers are assigned to specific customers or key field locations to communicate information regarding the status of pre-PSPS and restoration efforts.

The principal roles and responsibilities of the Account Management Team during a PSPS event are:

- 1) Field Major I/C customer calls and communicate their questions/concerns/issues through the assigned Account Management Team Manager

## **4.4 Community Resource Centers**

Prior to PSPS events, PNM will work with those local agencies that manage the Community Resource Centers (CRCs), such as those identified within a Hazard Mitigation Plan, located in an area of potential PSPS event. If a PSPS event is imminent, PNM will team up with local Public Safety Partners/community emergency management personnel to identify CRCs and post those locations on PNM's website. PNM will collaborate with local communities to aid emergency managers including:

- Periodic updates on utility service status
- CRC location(s) and coordination to be included in community outreach/outage notifications

Local, state, and federal emergency management identifies the specific CRC location(s), services offered, and hours of operation.

## **4.5 Command and Control (Coordination & Collaboration, Planning Function)**

During an event, for optimum restoration effectiveness to PNM customers, direction and control of all electric delivery restoration-related activities are centralized. The PNM Incident Commander (IC) reports directly to the SVP of NM Ops for all PSPS events. DOC and Power Operations (PWOP) will keep local Operations informed of the status of system equipment that affects the region.

Prior to a PSPS event, PNM will coordinate with emergency management personnel from the local municipality, county, and tribal government, as applicable, to review and coordinate local emergency/hazard mitigation plans. Additionally, PNM will coordinate with and participate in various agency forums, including periodic emergency coordination calls, ongoing situational awareness calls, or any other communication meetings designed to inform the local community of any potential upcoming PSPS. PNM will also communicate in advance with local agencies and will develop an information sharing process with agencies and identify necessary documentation to facilitate information sharing.

#### **4.6 Decision and Execution**

The next phase is decision and execution. As the decision to initiate a Public Safety Power Shutoff is considered, the focus will remain on gathering information to prevent potential wildfire ignitions and balancing that with community preparation and power needs to make the best decision possible. Once the decision is made and the power shut off, efforts in awareness, monitoring, communication, and coordination will continue.

Even with the power off, PNM will continue to communicate with customers and emergency responders, through available communication channels, acknowledging that some channels may not be available because of the outages. As outlined above, there are a variety of communication methods that could keep customers informed. PNM will work with local media outlets to provide information to listeners. However, in some cases radio equipment may also be subject to the PSPS and may not be available. Therefore, PNM will seek to identify the best methods of communicating with the local community in the event of a PSPS, including notification to telecommunications providers and identification of the potential for “cellular on wheels” capabilities in the area. Information will also be provided at the CRC, so that customers visiting one of these centers during a PSPS will have access to updated information on the PSPS duration and restoration.

As forecasted conditions approach and near the point that de-energization may be necessary, a recommendation to de-energize will be made in the formal Emergency Operations Center (EOC) setting and communicated to the SVP of NM Ops or designee who will issue the final order to de-energize service in the PSPS area. The process of shutting off power may not occur all at once and notifications will be sent updating customers and community members before their power is shut off, so they know if their outage is related to PSPS or other causes.

#### **4.7 Restoration and Feedback**

The power will remain off if high-risk weather prevails. This prevents the potential ignitions that could occur from airborne debris hitting lines, vegetation contact with power lines, or lines clashing. When the weather risk passes, we will enter the Restoration phase. Before power is turned back on, a thorough inspection of potentially impacted lines and equipment must be completed.

The restoration timeline is influenced by the time it takes to inspect for damage and repair any damage found. The commitment to minimizing restoration times began in the Notification and Coordination phase, and inspections will start as soon as the weather risk has passed. Communication with our customers and community leaders will continue throughout this phase, sharing the status of restoration efforts and providing updated estimates of time remaining to complete restoration while integrating your inputs to prioritize efforts.

In this restoration phase, PNM will ask the community to help by:

- Allowing power line crews access to customers' property for inspections and repairs.
- Keeping access roads clear and securing pets.
- Reporting visible damage through our customer service center (888-DIAL-PNM) or online (pnm.com/outage) while ensuring customers stay away from any damaged equipment. Always consider power equipment to be live.
- Allowing drones or helicopters to inspect power lines without interference.
- Avoiding unsafe generator connections that could endanger repair workers or the community. PNM will ask customers to only use their generator **IF** they have a generator cutover switch. If a customer does **not** have one, PNM will ask that customers **DO NOT** wire generators directly into their electrical panel, *as this could be dangerous*.

The CMR Team will coordinate inputs for a decision to begin restoration efforts. The decision will consider wind, weather and fire conditions subsiding to the point where PNM electric assets are not likely to cause a consequential wildfire ignition and conditions are safe to begin inspections. PNM will consider wind observations and forecast trends and consult with fire agency partners and community partners to help guide the decision to begin restoration efforts.

Once the decision has been made to begin restoration efforts, a series of events takes place:

1. Circuits are patrolled and inspected in priority order. The process of prioritizing the restoration effort started in the notification phase and is an ongoing process through restoration to full re-energization. DOC and PWOP are consulted for inputs to the re-energization process.
2. All circuits are patrolled looking for damage or other anomalies that might lead to failure and arcing upon re-energization.
  - a. Damage is documented and analyzed.
  - b. Estimates of repairs to damage are collected, shared, and used to refine restoration prioritization.
  - c. Damage is repaired.
  - d. Completed repair work is documented and communicated to DOC and PWOP

Note: Discovery of damage may impact restoration priorities – for example, a high priority circuit for restoration might not be restored first because downstream damage must be repaired before power can be brought to the priority circuit. Other lower priority circuits might be restored first as power is brought to higher priority circuits.

Circuits are finally re-energized in accordance with PNM standards and existing operating procedures.

#### **4.7.1 After Action Review**

An After-Action Review (AAR) is a structured review or de-brief process used to evaluate the effectiveness of the Plan, gather feedback, and identify potential areas for improvement. The goal is to clearly identify and document the factors and decisions that contributed to the outcome. The review may include operational processes, communication structure and responsibility, customer support, emergency response, and restoration. PNM may also request feedback from external stakeholders on coordination efforts, communications, and outreach effectiveness for integration into the AAR report. PNM will conduct AARs after each PSPS event to capture lessons learned.



## 5.0 Training, Exercises, Tabletops

An effective response to any incident is determined by the ability to implement a controlled incident command structure and to assume responsibility for restoration and recovery activities. It is critical that individuals having responsibility for functions within the incident command system are familiar with their responsibilities and have practice performing those responsibilities. Individuals identified with primary or secondary responsibility within the command center structure complete an annual review of the overall wildfire response and recovery plan. These individuals are required to contribute to post-wildfire and emergency reporting, outlining any issues or concerns regarding their roles and responsibilities. Periodic training exercises will be developed and implemented to ensure that individuals otherwise not involved in incident management regularly, can become practiced in responding.

PNM has a goal of continuous incident management improvement. Results of exercises and actual response incidents will be evaluated by identifying issues raised during the exercise or incident, preparing the AAR, developing corrective action plans, and documenting lessons learned. Lessons learned may be implemented for inclusion in PNM's response and restoration procedures.

PNM also coordinates and participates in tabletop exercises with public safety partners to enhance knowledge of each other's emergency operations for smooth interactions during PSPS events.

PSPS Plan exercises will be implemented at least annually using various scenarios and testing all or any portion(s) of the Plan which may include:

- Testing text and/or phone alerts with a test group of public safety partners
- Testing tactical operational plans such as reporting field observations or positioning employees at manually operated disconnects to evaluate timing
- De-energization and field inspections of T&D assets
- Discussing and/or practicing roles and responsibilities of both strategic and tactical operations, including decision-making handoffs and hypothetical scenarios
- Discussing and/or developing re-energization plans
- Testing capacity limits on incoming and outgoing communications systems

## 6.0 Next Steps

PNM is committed to continuing collaboration and communication with HFA communities on this PSPS Plan. Several next steps have been identified to continue to inform and improve upon this plan, including:

- Developing a community outreach process with information for residential and commercial customers
- Collaborating with grant-seeking, local communities on identification of funding sources for backup generation, including providing technical assistance
- Having regular communication with emergency response personnel at the state and local level to ensure preparedness in the event of a PSPS
- Providing emergency preparedness information to customers by attending diverse community events and special events
- Explore additional alignment with community emergency response and health management resources in HFAs for those who may rely on power for health and safety beyond those with Medical Certificates on file with PNM
- The PSPS plan and the Wildfire Mitigation Plan will be posted on our website at [www.pnm.com/wildfire-safety](http://www.pnm.com/wildfire-safety), including maps of PNM's HFAs and an FAQ addressing key questions asked during outreach efforts. Other informational materials to be developed and updated on the website.

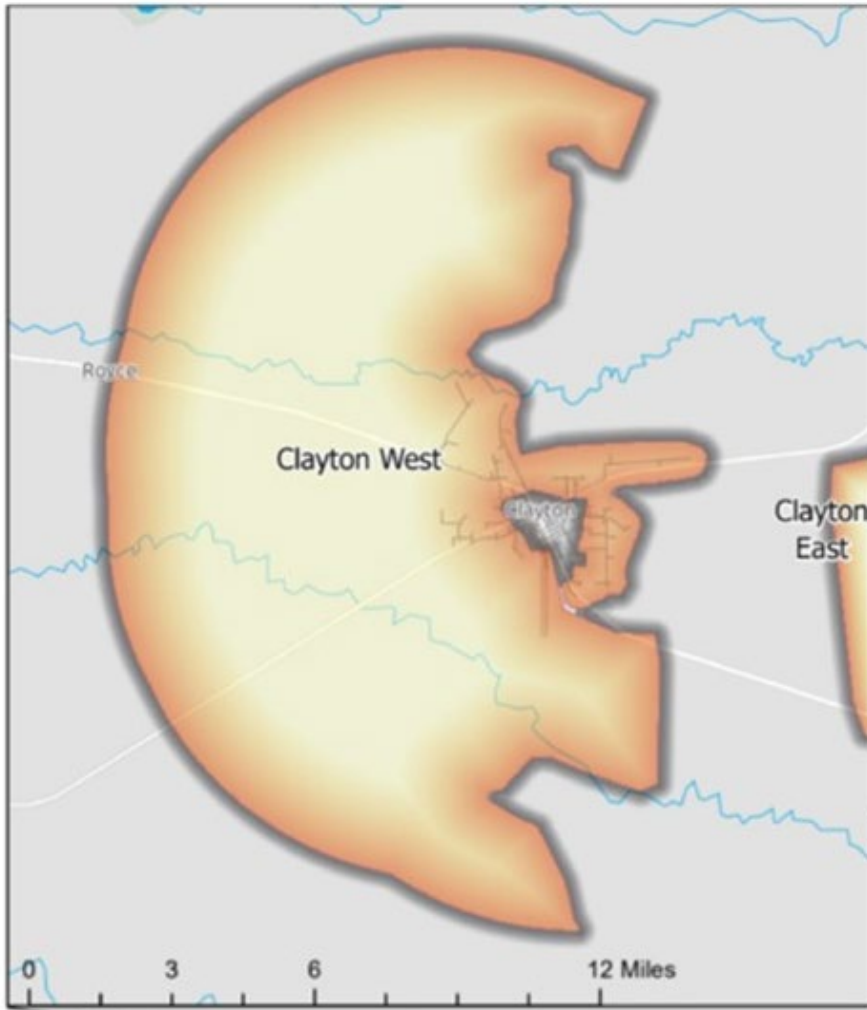
## **APPENDIX A**

### **HAZARDOUS FIRE AREA MAPS**

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# New Mexico Hazardous Fire Areas (HFAs)

## Clayton West



### Map Legend



### Transmission within HFA

**1.38 Miles**

0.04% of System

### Distribution within HFA

**19.63 Miles**

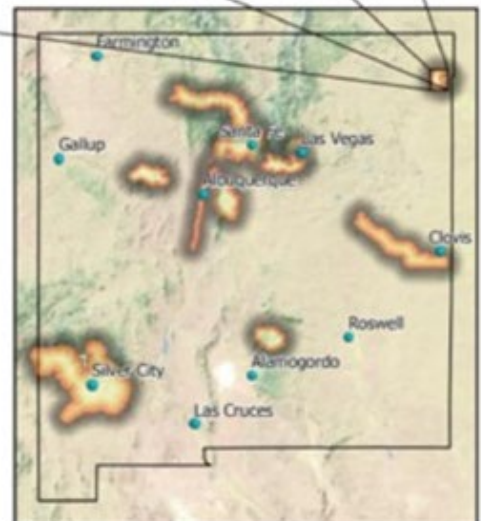
0.34% of System



### NWS Fire Weather Zone

**104**

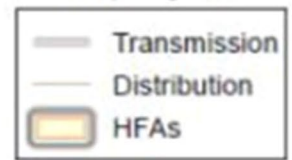
Northeast Plains



# New Mexico Hazardous Fire Areas (HFAs)

## Sandia Mts

### Map Legend



### Transmission within HFA

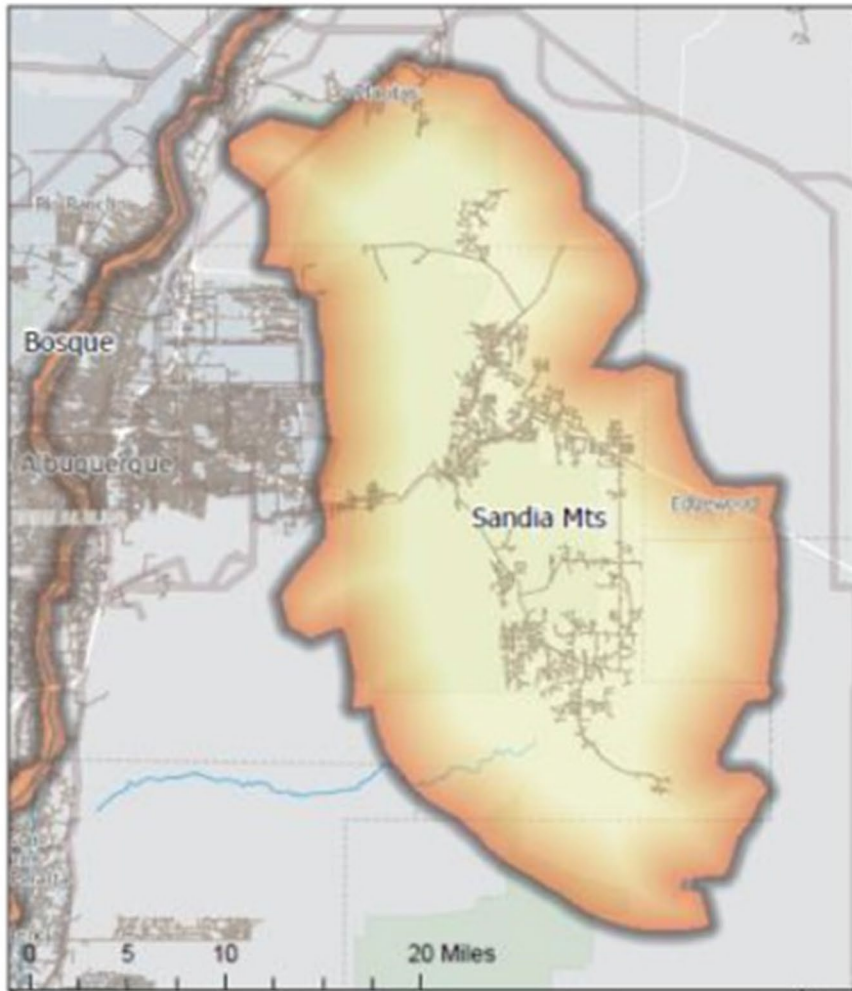
**27.42 Miles**

0.85% of System

### Distribution within HFA

**406.59 Miles**

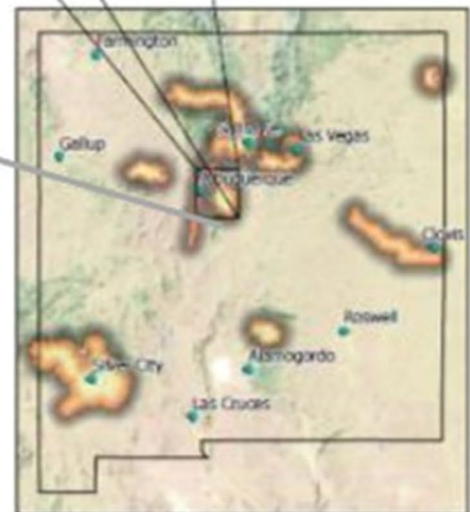
6.96% of System



### NWS Fire Weather Zone

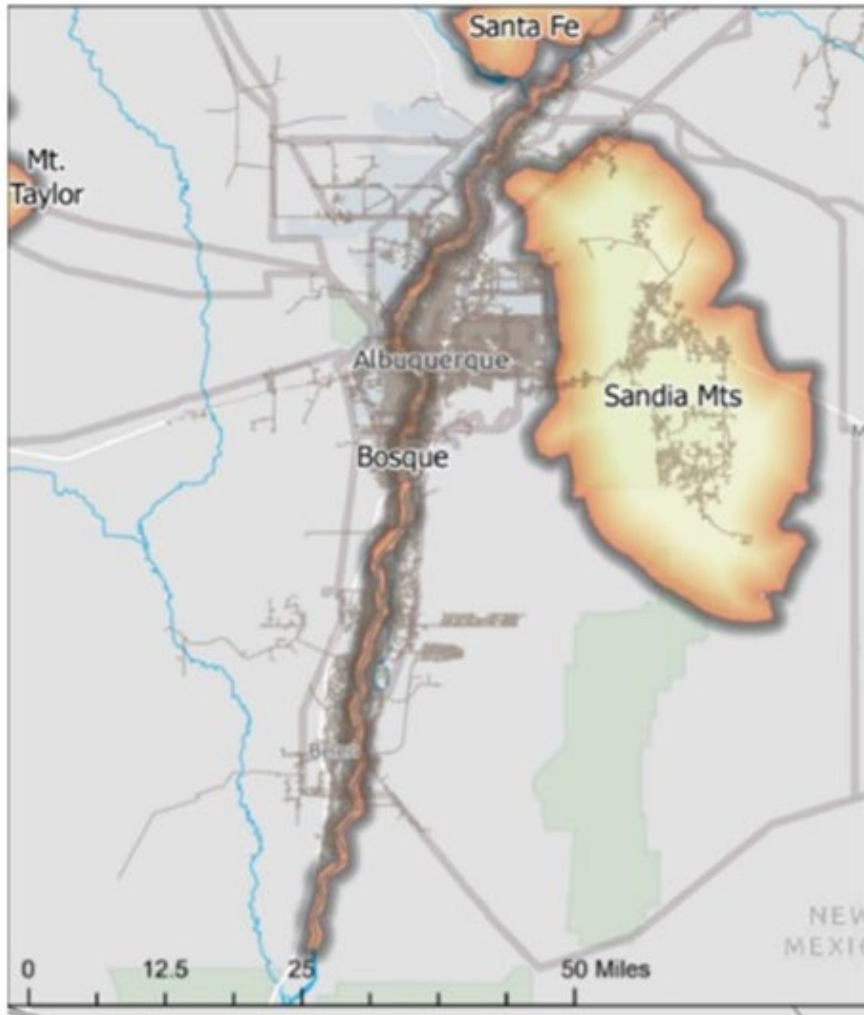
**107**

Sandia, Manzano and Gallinas Mts



# New Mexico Hazardous Fire Areas (HFAs)

## Bosque



### Map Legend



### Transmission within HFA

**4 Miles**

0.12% of System

### Distribution within HFA

**5.41 Miles**

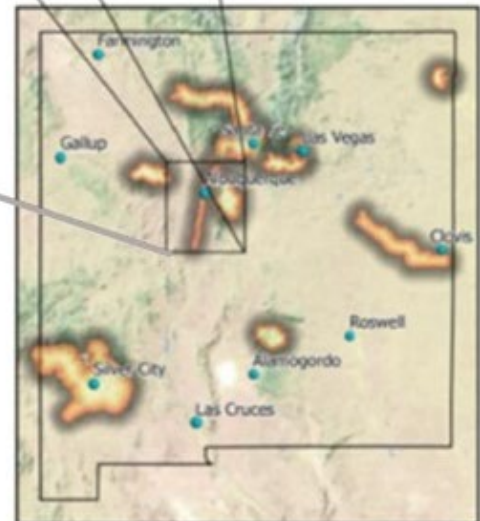
0.09% of System



### NWS Fire Weather Zone

**106**

Middle Rio Grande Valley



# New Mexico Hazardous Fire Areas (HFAs)

## Fort Sumner

### Map Legend

- Transmission
- Distribution
- HFAs

### Transmission within HFA

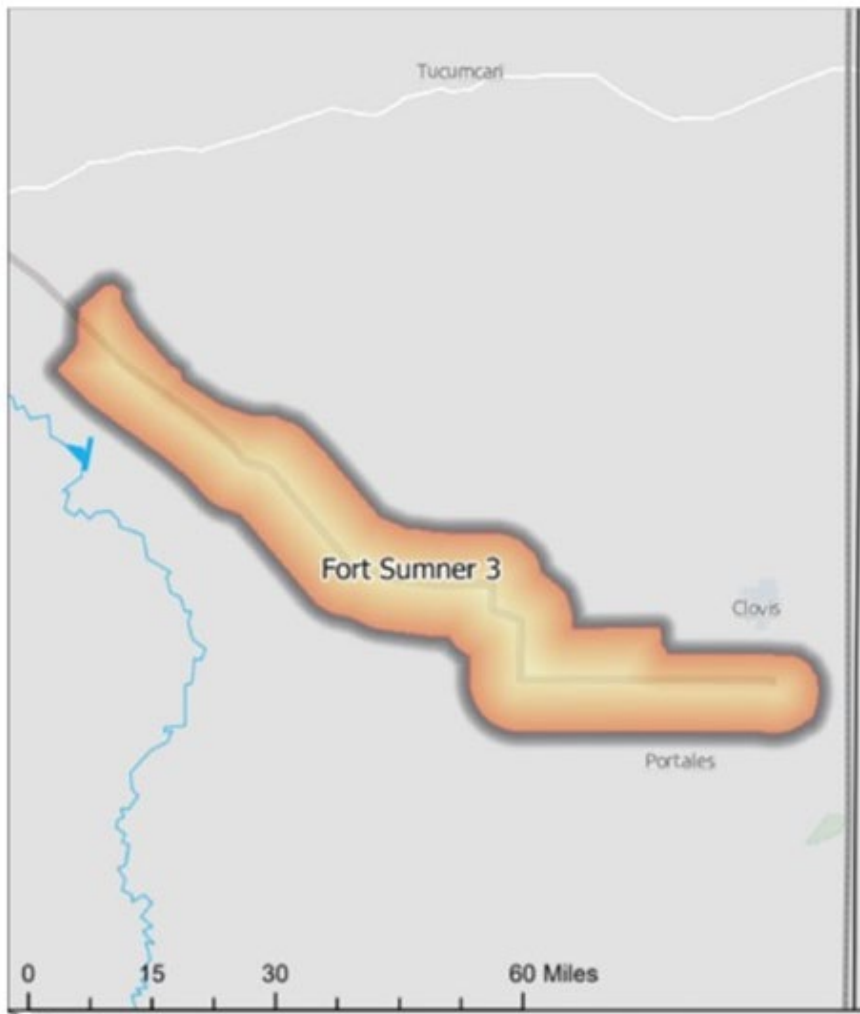
**88.34 Miles**

2.75% of System

### Distribution within HFA

**0 Miles**

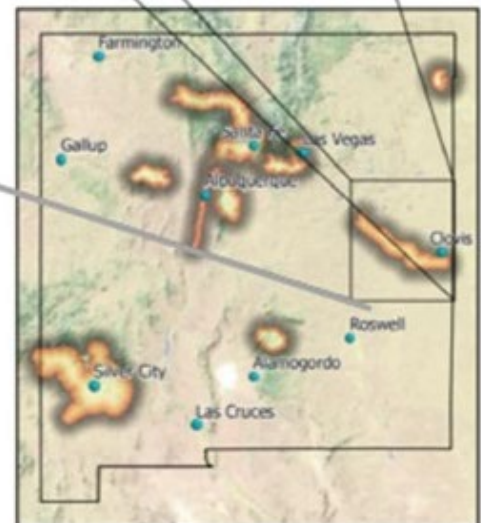
0% of System



### NWS Fire Weather Zone

**108**

East Central Plains





# New Mexico Hazardous Fire Areas (HFAs)

## Mt. Taylor

### Map Legend



### Transmission within HFA

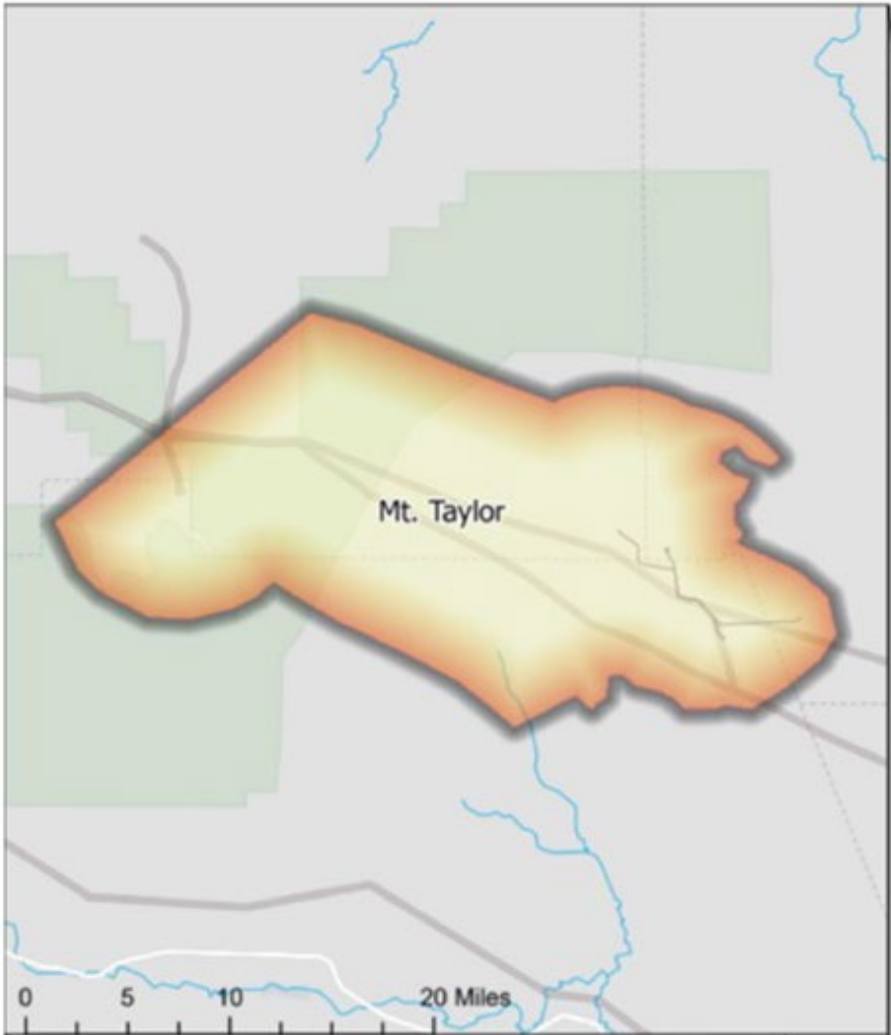
**63.04 Miles**

1.96% of System

### Distribution within HFA

**13.82 Miles**

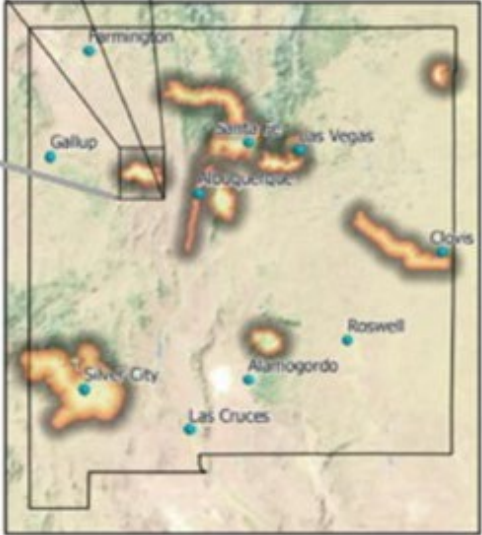
0.24% of System



### NWS Fire Weather Zone

**105**

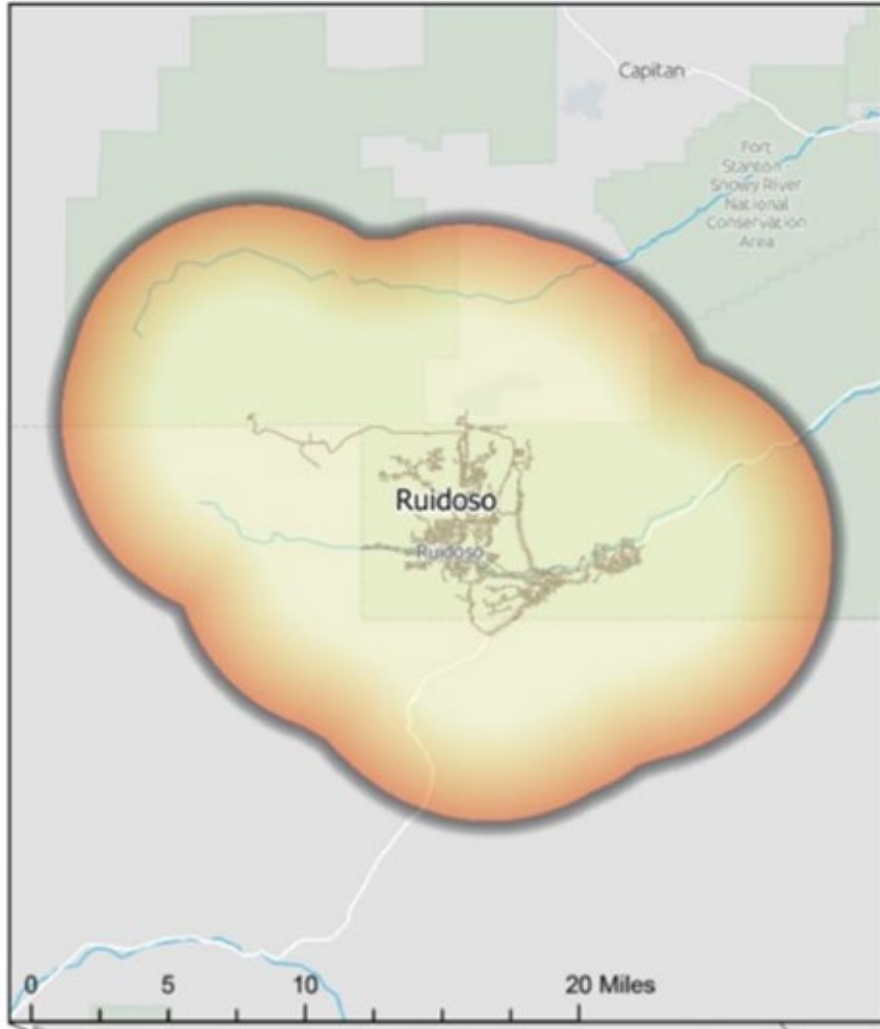
Northwest Highlands



# New Mexico Hazardous Fire Areas (HFAs)

## Ruidoso

### Map Legend



### Transmission within HFA

**5.4 Miles**

0.17% of System

### Distribution within HFA

**176.16 Miles**

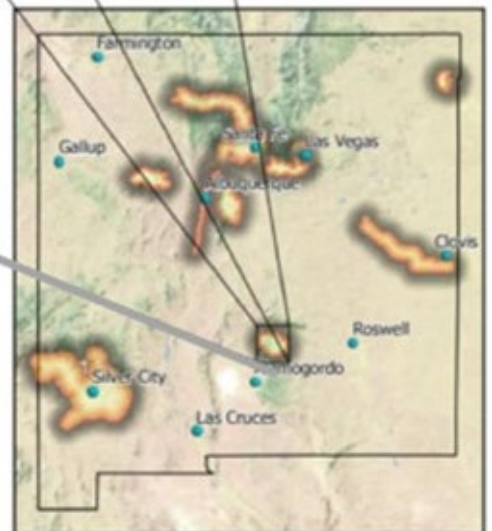
3.01% of System



### NWS Fire Weather Zone

**113**

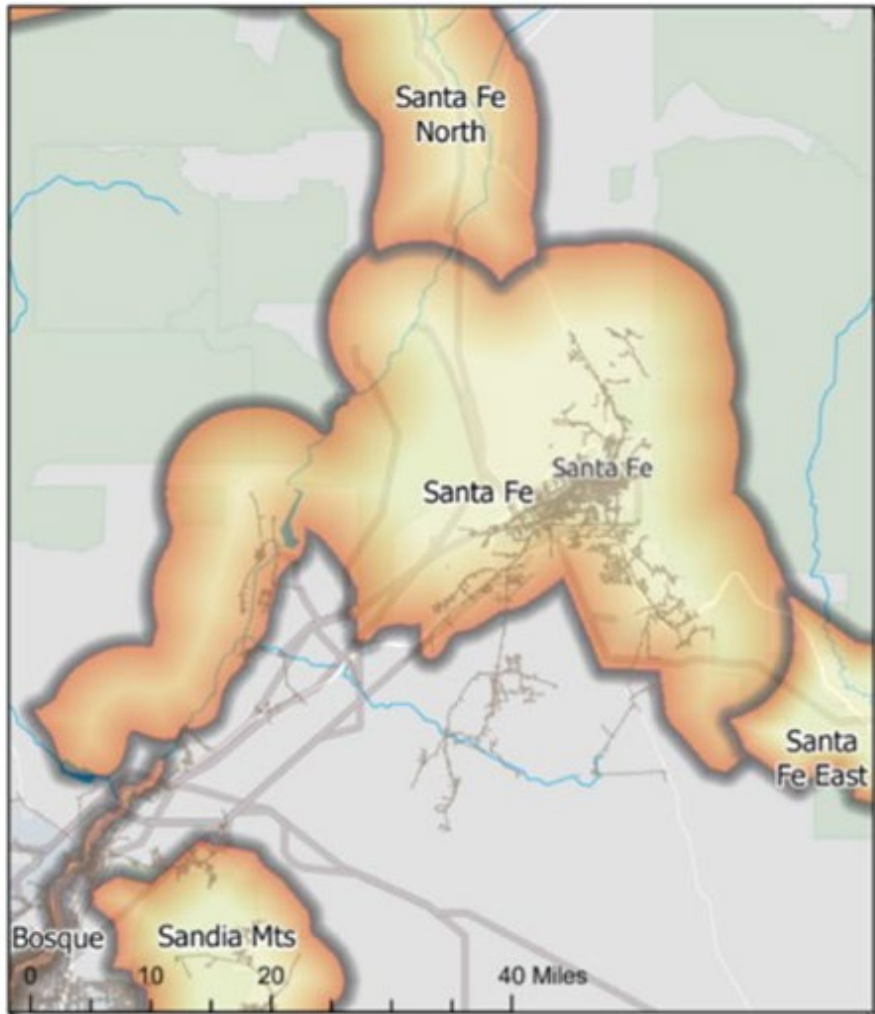
Capitan and Sacramento Mts



# New Mexico Hazardous Fire Areas (HFAs)

## Santa Fe

### Map Legend



### Transmission within HFA

**184.1 Miles**

5.73% of System

### Distribution within HFA

**497.68 Miles**

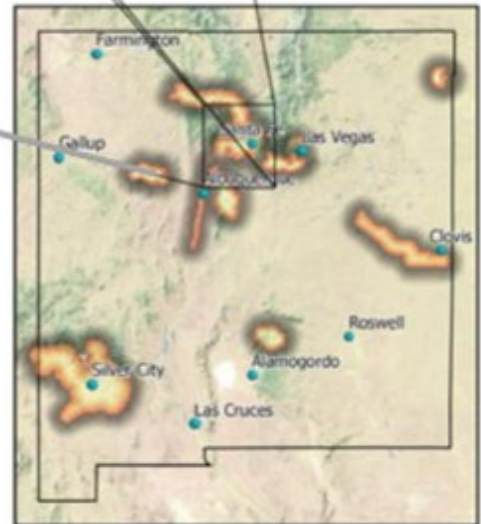
8.52% of System



### NWS Fire Weather Zone

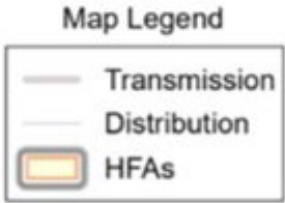
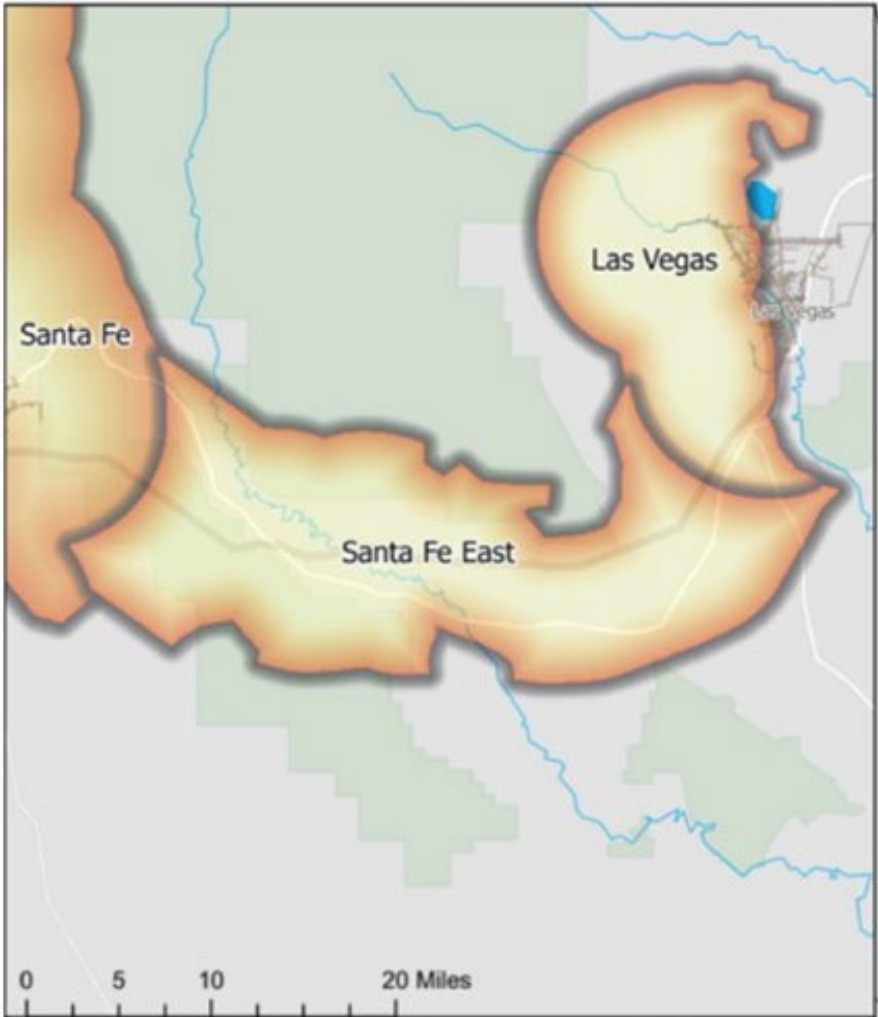
**102**

North Central Mts



# New Mexico Hazardous Fire Areas (HFAs)

## Santa Fe East



### Transmission within HFA

**27.17 Miles**

0.85% of System

### Distribution within HFA

**0 Miles**

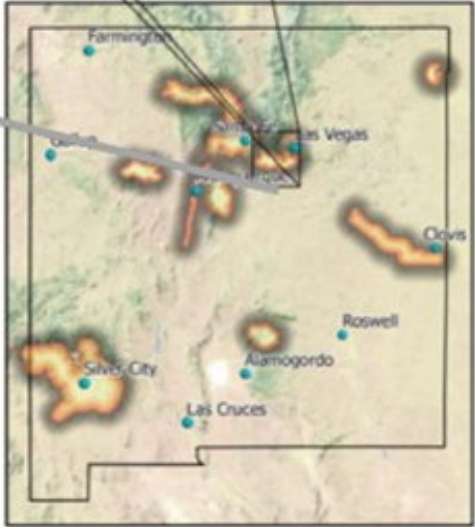
0% of System



### NWS Fire Weather Zone

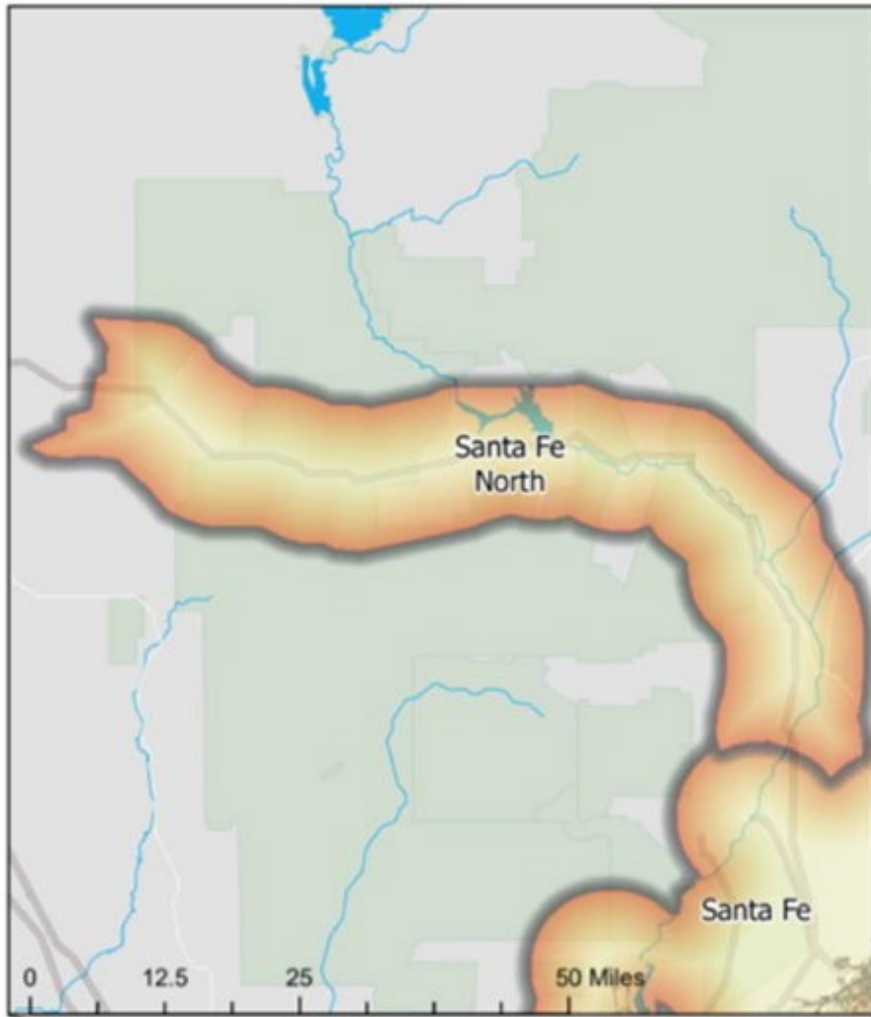
**103**

Northeast Highlands

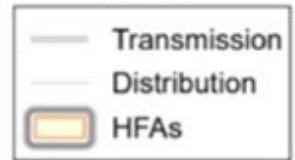


# New Mexico Hazardous Fire Areas (HFAs)

## Santa Fe North



### Map Legend



### Transmission within HFA

**74.21 Miles**

2.31% of System

### Distribution within HFA

**0 Miles**

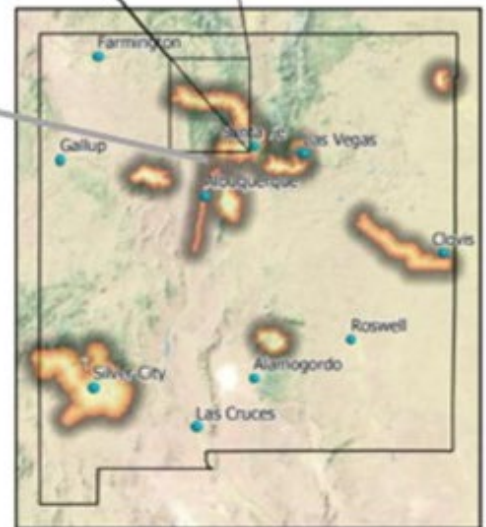
0% of System



### NWS Fire Weather Zone

**102**

North Central Mts



# New Mexico Hazardous Fire Areas (HFAs)

## Silver City

### Map Legend



### Transmission within HFA

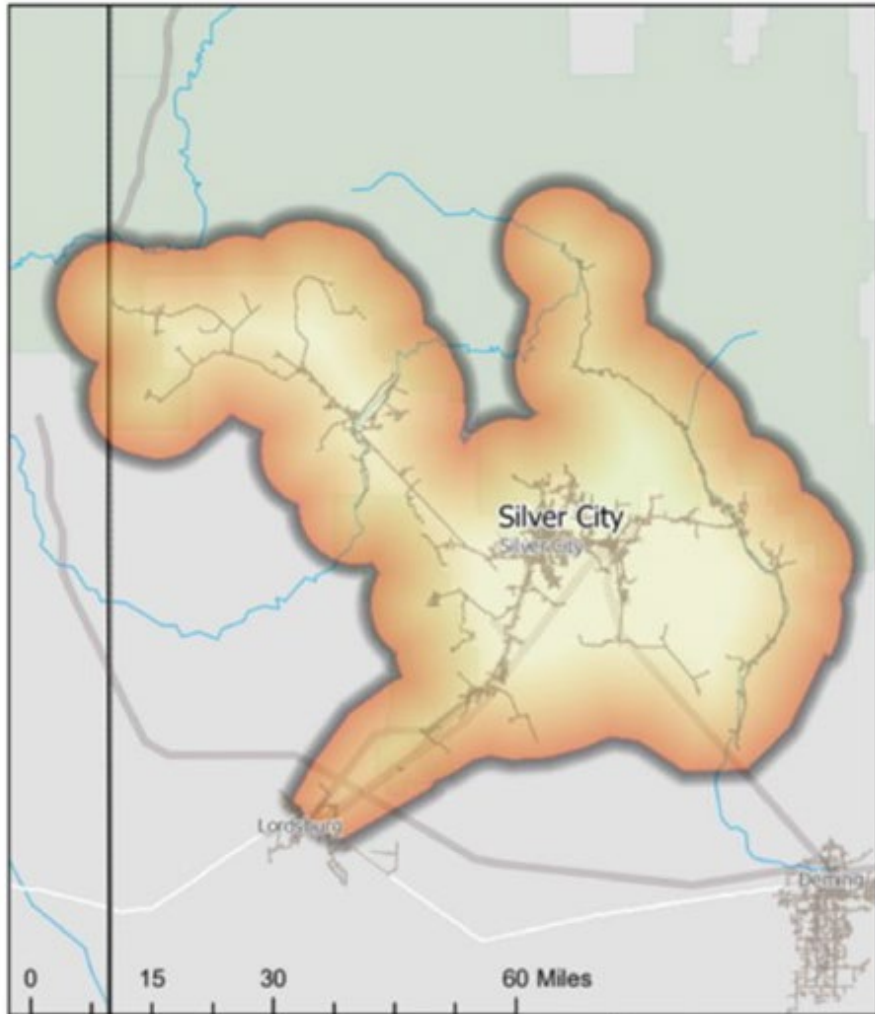
**194.5 Miles**

6.05% of System

### Distribution within HFA

**976.76 Miles**

16.71% of System



### NWS Fire Weather Zone

**110**

Southwest Mts

