



Edison Electric
INSTITUTE

Power by Association™

May 20, 2019

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte Notice: In The Matter of Public Safety and Homeland Security Bureau Seeks Comment on Hurricane Michael Preparation (PS Docket No. 18-339); and In The Matter of Public Safety and Homeland Security Bureau Seeks Comment on Improving Wireless Network Resiliency Through Encouraging Coordination with Power Companies (PS Docket No. 11-60)

On May 15, 2019, Aryeh Fishman, Associate General Counsel, Regulatory Affairs, of the Edison Electric Institute (“EEI”), of EEI, Chris Eisenbrey, Senior Director, Preparedness & Recovery Policy, of EEI, Wallace Mealiea, Senior Manager, Preparedness & Recovery Policy, of EEI, Keith Hull, Vice President, Distribution Operations, Oncor Electric, Ed Scott, Director of Operations, CenterPoint Energy, Allen Bell, Distribution Support Manager, of Georgia Power Company and David Maske, Emergency Operations Director, of Georgia Power, met with Jeffrey Goldthorp, Jennifer Holtz, Suzon Cameron, Michael Connelly and Robert Finley of the Public Safety & Homeland Security Bureau. Topics of discussion were regarding the Federal Communication Commission (“FCC” or “Commission”) inquiries on Hurricane Michael Preparation and on improving wireless network resiliency through encouraging coordination with power companies, in the above-referenced dockets, including the Commission’s recently issued Report and Recommendations in Docket No. 18-339.¹

EEI is the trade association that represents all U.S. investor-owned electric companies. Collectively, EEI’s members provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia and directly and indirectly employ more than seven million people in communities across the United States. EEI’s members invest more than \$100 billion each year to build a smarter energy infrastructure and to transition to even cleaner generation resources. Electric companies are among the nation’s largest users of communications services and operate some of the largest private communications networks, therefore EEI has filed

¹ See *October 2018 Hurricane Michael’s Impact on Communications: Preparation, Effect, and Recovery, A Report of the Public Safety and Homeland Security Bureau*, PS Docket No. 18-339, issued May 2019. (“Report”).

comments with the Commission in various proceedings affecting the interests of its members including in the above referenced dockets.

In this meeting, these company and trade association representatives expressed appreciation for the Report issued in PS Docket No. 18-339 on Hurricane Michael's impact on communications. Hurricane Michael was a "Category 5" storm and one of the most powerful storms to make landfall in the U.S. and the Report was correct to acknowledge the very substantial challenges faced by electric companies in the Florida Panhandle that had to rebuild entire sections of the energy grid after the hurricane. The company and trade association representatives described how Hurricane Michael was an extreme event with storm surge and winds that made restoration operations particularly challenging and created a greater amount of debris associated with that damage and more risk of fiber cuts.²

The company and trade association representatives described the investor-owned electric industry's mutual assistance programs and how that framework encourages electric companies to share resources and develop best practices, resulting in scalable plans, additional workforce and equipment for restoration activities. For example, company representatives described how they were able to quickly mobilize more than approximately 35,000 workers, including line workers and support staff from impacted companies and from those providing mutual assistance from 27 states and Canada as well as equipment, many of which were pre-positioned prior to the storm.

EEI and company representatives described how the electric industry participates and hold exercises to prepare for restoration activities. Collaboration between electric companies and communications providers might be improved by increasing the participation of communications providers in these types of exercises and particularly by participating in state-run exercises.

EEI and company representatives emphasized that it is critical for communications providers to embed with and be in constant contact with local officials in the Emergency Operations Centers ("EOCs") before, during and after storm events. EEI and company representatives made clear that the best place for coordination with electric companies is at the EOCs, as opposed to electric company storm centers. It is in the EOCs where communications providers can coordinate not only with electric companies but also with state/local officials and other stakeholders.

EEI and company representatives also expressed that storm restoration could be improved if communications providers, in addition to taking steps to harden their assets, proactively inform electric companies where their critical fiber is located (e.g., by tagging lines or providing locators). EEI and company representatives cautioned that Hurricane Michael was an extreme event that should not be considered a model for planning and development of future practices.

EEI and company representatives discussed electric industry recommendations for improving coordination with communications providers including that communications providers should consider hardening their infrastructure and design their networks to avoid single

² See attached, courtesy of Georgia Power.

points of failure. EEI and company representatives described electric industry design standards and construction practices and shared the observation that fast-cheap deployments do not equal resilient systems.

EEI and company representatives expressed appreciation for Commission initiatives like the Broadband Deployment Advisory Committee (“BDAC”) and its Disaster Recovery Working Group and hope that this group will produce recommendations for improved coordination. The BDAC Disaster Recovery Working Group is charged with, among other things, developing best practices for coordination among wireless providers, backhaul providers and electric companies before, during and after a disaster, however, investor-owned electric companies are not adequately represented in this group and therefore EEI suggests that the Commission expand the membership to ensure balanced representation.³

EEI and company representatives also expressed support for the Report’s recommendation that the Commission engage in coordination with the Federal Energy Regulatory Commission to identify ways that federal regulators can encourage harmonization and enhancement of restoration activities. However, EEI also suggested that the scope of these discussions should be broadened to consider other areas of common concern between the energy and communications sectors (such as the adequate availability of spectrum to support critical infrastructure).

In sum, the electric industry continues to apply lessons learned from each storm event to improve infrastructure security and resiliency and to promote safe, effective hurricane response and service restoration.

Respectfully submitted,

EDISON ELECTRIC INSTITUTE

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cc: Meeting participants

³ EEI noted that current membership of this working group includes only one investor-owned electric company.