

CLIENT ALERT

Roadmap For Electric Utility Pandemic Response Planning

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The Federal Energy Regulatory Commission, Department of Energy, North American Electric Reliability Corporation and the North American Transmission Forum issued an [Epidemic/Pandemic Response Plan Resource](#) (“Resource”) yesterday, providing guidance to plan for and respond to an epidemic or pandemic event. It outlines planning, response, and recovery strategies, and recommended actions in scenarios ranging from a small outbreak to a severe pandemic outbreak, to complement business continuity plans and protect personnel health and safety.

While the Resource is directed primarily to electric transmission organizations in light of COVID-19, it also could guide the pandemic planning of other critical infrastructure sectors, such as generators, to ensure uninterrupted operations and business functions during a pandemic.

Many preparation and mitigation strategies outlined in the Resource could be developed by the electric industry more broadly in advance of a pandemic event, including:

- identifying essential positions, work schedule plans, and contingency plans;
- establishing work from home policies and workplace sanitation procedures; and
- developing strategies to maintain cyber and physical security during a pandemic.

It also provides a template for a documented epidemic/pandemic response plan that would outline roles and responsibilities, pre-event planning, response, and recovery. While this Resource comes in the middle of the COVID-19 response and recovery, it seems likely that regulatory authorities will expect or require owners and operators of electric infrastructure to have documented epidemic/pandemic plans in the future, and the Resource provides a roadmap for such plans. Crowell & Moring’s [Coronavirus Resource Center](#) is available to help companies navigate the rapidly evolving business, legal and operational challenges associated with the COVID-19 pandemic, and looking forward, companies owning or operating electric infrastructure should review and consider the Resource’s roadmap in developing their epidemic and pandemic response plans.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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