

1 Q. In order to provide a record copy of document(s) already provided informally,
2 please provide the Crisis Communications Plans and other storm-related
3 communications plans in effect - the detailed procedures that are followed during a
4 storm/outage event, that support the Emergency Plan.

5

6

7 A. The procedures that are followed during a storm/outage, that support the
8 Emergency Plan, include:

9

10 1. Power Outage and Emergency Operating Procedures – filed as part of the
11 *Review of Supply Disruptions and Rotating Outages: January 2-8, 2014*, Focus
12 Area Report – Coordination and Communication with Customers, Appendix 1.

13

14 2. Communications and Emergency Response Plan (filed as part of PUB-NLH-069),
15 sections as follows:

16

a. 4.2.5 Communications Advisor; and

17

b. 4.3.9 Communications Support Desk – action checklist.

18

19 3. Emergency Communications Plan. This plan is currently in draft format, last
20 updated in November 2013. The plan is not yet finalized and will require a full
21 mock-exercise in coordination with the Corporate Emergency Response Plan,
22 before it is signed off and implemented, which is anticipated to occur before the
23 end of June 2014. This document is included as PUB-NLH-137 Attachment 1.¹

¹ Contact information has been redacted.



EMERGENCY COMMUNICATIONS PLAN

VERSION 3.0

NOVEMBER 2013

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22	CEOC	Corporate Emergency Operations Centre	Nalcor Energy	

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I. INTRODUCTION

Nalcor Energy's Emergency Communications Plan (ECP) is a reference guide to assist leadership and communication staff in making decisions with respect to handling crises and emergencies.

Emergencies can happen anywhere, at any time, and often occur when they are least expected. When an emergency does occur, events usually unfold rapidly, leaving little time for planning. That is why advance preparation is essential.

Some emergencies/crises can be predicted and prevented, and those that cannot be avoided can be minimized if handled properly. Aside from tangible damage, an emergency or crisis not handled appropriately can also destroy a company's reputation. The longer an emergency goes on, the more damage it can do. Effective communications, during and after an emergency, is imperative to maintain a positive reputation for all key Nalcor Energy stakeholders. It can lead to a better understanding of the situation and help send a clear message that Nalcor Energy is doing all that it can – as quickly as it can – to remedy the situation. When this plan references "Nalcor Energy", it means Nalcor Energy and all its subsidiaries and lines of business.

This plan deals specifically with emergency or crisis communication, and aligns with the company's emergency response plans. For the purposes of the plan, the term "emergency" will be used interchangeably with the term "crisis", even though there are distinctions to be made between the two in certain circumstances.

The President and CEO or the Vice President, Corporate Relations will activate this communication plan, but others will have a role, particularly the Emergency Communications Team (ECT).

The plan is written to help the team take control of an emergency in a way that achieves an effective resolution, communicates clearly and accurately and facilitates respect for Nalcor Energy.

Due to the uniqueness of each emergency situation, this plan can only provide a general foundation to start planning and sound principles to follow in responding. This plan aligns with, and supports, the Corporate Emergency Response Plan (CERP).

Even under the most difficult circumstances, when an emergency means lives are at stake, the number of people directly affected is comparatively smaller than the number who will become aware of the emergency through the media, through word-of-mouth, or, in the best circumstance, through Nalcor Energy.

Public reaction to an incident will therefore be guided by media reports and through public information. This means that public perception of the organization's performance in an emergency is largely determined by how the organization communicates to its employees, those affected the community, the media and other stakeholders. An emergency, which is well handled on an operational level, can be perceived to be mismanaged if Nalcor Energy fails to communicate effectively during and following the emergency. The resulting consequences to the company's reputation, and even its legal position, can be significant.

Effective emergency response communications is largely dependent on having well-defined communications procedures. These communications procedures must be synchronized with the operational response process and must report to the same overall management structure. Communication decisions should be made in concert with other key management, policy and operational decisions during an emergency. Communication implications of key decisions must be considered carefully by key decision-makers before they are implemented.

A senior communications' professional within the organization is a critical member of the CEOC Team. In addition, an effective response hinges on having a well-trained communications team that can be mobilized quickly to respond to any type or level of incident. All communications activities must be planned to ensure the protection and safety of the company's employees, the public and the environment and to support the company's reputation as a safe and reliable operator who is responsive during an emergency.

This manual is designed to be a critical section of the organization's overall Corporate Emergency Response Plan. While the plan may allude to the organization's operational response in various sections, its sole purpose is to assist in the management of communications before, during and after an emergency. This manual contains the *Emergency Communications Plan*, which has been developed by Nalcor Energy to assist in the overall management of communications during a variety of emergency situations.

II. ABOUT THIS PLAN

The purpose of this plan is:

- to clearly define the roles and responsibilities of the Emergency Communications Team (ECT) members so they can organize quickly to respond efficiently and effectively to an incident;
- to ensure team members understand their roles and working relationships with other emergency response teams;

This *Emergency Communications Plan* outlines the systems and procedures required during the execution of external and internal communications during an emergency, and explains the roles and responsibilities for individual team members.

This manual is divided into a plan and six appendices:

Emergency Communications Plan, which describes structures and procedures and how the Emergency Communications Team fits into the overall Corporate Emergency Response Plan (CERP).

Appendices:

1. **Handbooks**, which outlines the roles and responsibilities assigned to, and the results expected of, individual team members. It also includes a list of key contacts, equipment and supplies required to communicate effectively during an emergency, as well as activity checklists.
2. **Contact lists**, including up-to-date contact information for Emergency Team Communication members, external consultants, government contacts, internal contacts, external communicators and municipal contacts.
3. **Emergency Kits**, details the equipment and materials for the Hydro Place Emergency Team Communication emergency kit, as well as a mobile kit.
4. **Support documents**, provides copies of documents that may be used in preparing and messaging during a crisis.
5. **Maintenance documents**, includes checklists to ensure the Emergency Communications Plan and appendices are current and that the plan is being reviewed and practices by Emergency Team Communication members.
6. **Support Materials** - Easy reference section that includes all necessary Emergency Communications Team forms, contact lists, etc.

All materials are available on the Corporate Affairs drive (H:\Corporate Affairs\Emergency Communications Planning\3.0 November 2012 ECP) and also under the CERP folder on H. As well a CD of materials is available in the CEOC and CEO's office.

This manual also outlines Nalcor Energy's principles, philosophy and strategic considerations for communicating during an emergency. It provides a basic outline for developing emergency communication plans pertaining to the three stages of effective emergency communications:

1. Advance preparation (before a emergency)
2. Quick, effective response (during a emergency)

Follow-up and ongoing preparedness (after an emerge

SECTION 1.0 COMMUNICATING IN AN EMERGENCY

- 1.1 Our Commitment
- 1.2 Definition of an Emergency
- 1.3 Alert and Emergency Response Levels
- 1.4 Audience and General Information Needs
- 1.5 Emergency Communications Objectives
- 1.6 Emergency Communication Principles
- 1.7 Strategic Considerations
- 1.8 Emergency and General Contact Lists
- 1.9 Contact List and Notification Process for ECT

1.0 COMMUNICATING IN AN EMERGENCY

1.1 Our Commitment

Nalcor Energy is committed to communicating openly and honestly with the public and key stakeholders during an emergency. The company's effectiveness depends on our ability to supply accurate information as quickly as possible during an emergency. The number one priority of Nalcor Energy's emergency response effort, whether it is its operational or communications response, is to protect the safety of its employees and the public, the long term integrity of our operations and the communities in which we operate. Nalcor Energy will disclose pertinent information on a timely basis to respond to that priority.

In the event of an emergency, Nalcor Energy's priority is to inform employees, key customers and stakeholders, governments, media and the general public in an effort to help everyone understand the nature of the emergency and the company's general approach to managing the incident. In the event of an escalating emergency, Nalcor Energy's communicators will monitor public, government and media reaction. This will help determine ensure the most appropriate response.

1.2. Definition of an Emergency (as per CERP)

An emergency is defined as any unexpected occurrence either resulting in (or having the likely potential to result) in death, serious injury (or illness) requiring hospitalization, environmental impact posing a serious threat to on-scene personnel or wildlife, major and significant damage to Nalcor Energy or other property, or significant public impact. The response to such incidents requires immediate notification and action.

An emergency could be something accidental or something that happens suddenly. It could also be an emergency of confidence; a situation that may cause key stakeholders to lose confidence in the company or its leaders. The more people that are impacted by a given situation, the more serious the situation is from a communications point of view. An emergency that affects one or two employees is less strenuous on communications than an emergency that affects 100 employees. That does not minimize the response or change the organizations focus, it simply means the communications activity is not as onerous. An emergency that impacts a large portion of the population or one that puts at risk a large number of people, will be the occurrence that places the most stress on the organization and challenges the communications team to the highest degree.

Emergency communications is strategic communications when the stakes are the highest. It's a responsible and ethical plan designed to minimize damage to a company's reputation through active management of internal and public communications.

Nalcor Energy is recognized by its stakeholders and peers as being highly credible, honest and competent. This reputation has allowed the company to recruit highly skilled and professional individuals and attract new business opportunities. It's therefore imperative that Nalcor Energy protect the reputation of its organization and the network that it has built. While no one wants to face an emergency, it's just good business to be prepared.

A company's future in the face of a emergency is dependent on a strong emergency communications plan. Companies and organizations that prepare for an emergency are more likely to recover quickly, and some are even stronger as an organization for having worked through that experience.

It is also important to note that the communications plan is only as good as the organizational response. The operational emergency response is the most important aspect of emergency response. The communications plan is the support to that activity. The Communications plan must be built around how well the organization can mobilize and fix a problem. Too often a company will assume a good PR plan will get them out of a big problem. The truth is that PR cannot fix a dysfunctional or misguided

operational response. An organization will come through an emergency with a good reputation when the operations team were effective in how they managed the situation and when the communications team were effective in how they dealt with stakeholders.

Examples of potential crises:

- An Incident which results in, or could result in, loss of life or a serious injury (e.g. vehicle collisions, lost personnel, etc.)
- Explosions or major fires
- Loss of power system equipment that results in significant supply interruption that could exceed the Maximum Acceptable Downtime
- Hydrocarbon or chemical spills
- Loss of or damage to helicopters or fixed wing aircraft
- Hazards posing an imminent threat to the operating area such as heavy weather
- Major or significant damage to equipment not caused by any of the above (e.g. materials handling equipment failure)
- Security related incidents involving issues such as extortion, bomb threats or acts of terrorism

1.3 Alert and Emergency Response Levels

There are 3 Levels of Emergency Response at Nalcor Energy (source: CERP). Generally speaking:

1. **Level 1 Minor** local emergencies are managed on-scene and in coordination with local response agencies. Support from the CEOC is not required.
2. **Level 2 Major** local emergencies are managed on-scene and in coordination with local response agencies. Full or Partial Support from the CEOC is required.
3. **Level 3 Catastrophic** emergencies cannot be managed on-scene even with support from local response agencies. Full Support from the CEOC is required.

For more information on Alert and Emergency Response Levels, see Appendix 6: Nalcor Energy Corporate Emergency Response Plan (CERP), Version 1.5.

1.4 Potential Audiences and General Information Needs

Potential Audiences

- Shareholder
- Board of Directors
- Employees
- Newfoundland Power, Industrial Customers, Hydro Quebec
- Regulators – PUB, C-NOLPB, DNR, Consumer Advocate
- Partners
- Retail customers
- Suppliers/Vendors/Contractors
- Other Governments; municipal, provincial and federal as appropriate
- Communities/Municipalities

- Community Leaders/NGOs/Community or Industry Groups
- Financial Community
- Media

General Information Needs

At the onset of a crisis the following information should be released to all audiences:

- An incident has occurred
- Nature, location and time of incident
- Status of employee and public safety
- What actions are being taken to manage the emergency
- What actions need to be or will be taken
- How and when further information will be available
- Where specific audiences can go to obtain further information

1.5 Emergency Communications Objectives

1. To position Nalcor Energy as a responsive and credible source of information, from initial statement to on-going media relations
2. To demonstrate that Nalcor has the operational capacity and expertise to react quickly and effectively to an emergency
3. To always show compassion and understanding
4. To accurately reflect Nalcor Energy actions in all public statements
5. To maintain contact with priority audiences. (The priority of audiences changes with respect to emergency situations)
6. Develop more specific messages for each audience
7. Act quickly to counter rumors and misinformation
8. To put damaging information or charges in perspective, where possible

1.6 Emergency Communication Principles

Nalcor Energy will manage emergency communications in a proactive manner and according to the following guidelines:

- Be caring and empathetic
- Be factual, consistent and clear
- Be cooperative with stakeholders and team members
- Communicate early and often - proactive
- Be open, honest and forthright with all information – good and bad

1.7 Strategic Considerations

- What are the toughest questions we will be asked by key parties in this controversy?
- What is our response?
- Does Nalcor have the resources it needs to respond effectively?
- What are our basic strengths around this emergency?
- What other resources will be asked for advice and counsel on this issue?
- What might Nalcor Energy say and/or do to defuse or minimize this issue? How might it be turned into a plus?
- Are there opportunities for a coalition approach to the issue? Who are our likely allies and how can they help us?
- Are there opportunities for a compromise or joint study of the problem? If this issue has not yet flared, what steps might be taken to accelerate dialogue with our adversaries?

- What innovative, unexpected approaches might we consider?
- What related issues should Nalcor Energy initiate for the public agenda?
- Who are Nalcor Energy's best-informed and persuasive speakers on this issue? Are they media-trained?
- Do the proposed communications strategies and responses meet these standards:
 - a) Compassionate, caring
 - b) Balanced, and restrained if necessary
 - c) Concerned about public perceptions

1.8 Emergency and General Contact Lists

See *Appendix 2: Contact Lists* for internal and external emergency contacts and *Appendix 6: CERP* (appendix A).

2.0 EMERGENCY COMMUNICATION PROCESS

- 2.1 Emergency Communication Strategy
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 - 2.2.2 Corporate Emergency Response Team (CEOC)
 - 2.2.3 Emergency Communications Team (ECT)
 - 2.2.4 Emergency Communications Response Process
 - 2.2.5 Emergency Communications Team Reporting Structure

2.0 EMERGENCY COMMUNICATION PROCESS

2.1 Emergency Communication Strategy

The emergency communications process includes specific activities that support the company's emergency communications philosophy and guides all responders in making effective communications an integral part of the overall emergency response. Specific communications activities are grouped into three categories:

1. Actions before an emergency
2. Actions during an emergency
3. Actions after an emergency

Before an emergency occurs:

The quality and effectiveness of the communications response to emergency situations is directly related to how well we are prepared, therefore we must:

- Plan and prepare in advance of an emergency (e.g. assign roles, list contact names, organize facilities).
- Establish and allow for frequent training and testing of our plans through simulations, and communication skills training.
- Review and update facilities and documentation as required.

During an emergency:

The true test of our emergency response communications plan occurs when we are managing real events. During an emergency we must:

- Respond immediately to external enquiries using designated individuals trained to handle initial communications needs (Incident Commander or Deputy Incident Commander).
- Assemble Emergency Communication Team members as required. The nature of the emergency, threat to public or employee safety, predicted intensity of public scrutiny and potential damage to the company's reputation will all influence these staffing decisions.
- Dispatch communicators to incident site locations if required as soon as possible.
- Make effective use of a network of trained communicators who can assume the specific roles and responsibilities on the Emergency Communications Team.
- Manage use of spokespeople and flow of information to ensure consistent messages are delivered.
- Establish effective working relationships with third parties who also have a responsibility to communicate to the public (e.g. police, other safety and regulatory services).
- Implement a strategic communications plan to support the company's overall communications objectives.

After an emergency:

Invariably, valuable lessons are learned during actual emergency response situations.

- An integral part of continuous improvement involves the thorough analysis of incidents. To that end we will:
- Review and analyze the positive and negative aspects of the overall communications response.

- Implement a "post-emergency" communications plan to rebuild public confidence in the company, if necessary.

2.2 Structures and Procedures

Avoiding an emergency situation is not always an option. Effective emergency communications starts with knowing who is available and who to deploy during an incident. At Nalcor Energy, a network of communications professionals can be called on to provide emergency communications expertise. Part of this network's training includes establishing more than one method of assembling the team on a moment's notice.

The team needs to be quickly briefed on the incident or emergency: What happened? When did it happen? Was anyone hurt?, how many people have been or could be impacted ?etc. Once the team understands the situation, it must do the following:

What level of action is required? Can this incident be handled locally or should the Corporate Emergency Response Plan be activated for communications response?

The Emergency Communications Team also needs to do the following, in this order:

Identify potential issues - Consider impact to the company's reputation, employee reaction, media reaction, reaction of clients, suppliers, and government, short term and long-term impacts, reaction from public and other audiences.

Identify key stakeholders - Consider all audiences that might be impacted by the issue/emergency, and list them in order of importance (i.e. internal audiences must learn of news before media and public., sometimes, in an extreme situation you may use the media as the quickest means to disseminate information, always follow up with internal stakeholders if this is the case)

Identify communications objectives - Develop clear and concise objectives to help plan the development of your key messages. Ask yourself: What do we want our audiences to say about the organization after the emergency? This will help you shape your objectives (i.e. Nalcor Energy is a transparent and professional organization.)

Develop key messages – See Key Messages Section 5.3 Developing Materials.

Identify communications strategy - Identify spokesperson; explore possible scenarios; establish overall tone of communications; communicate internally first; establish protocol (who says what, when, in what order?); contact proper authorities; regularly update media; hire consultants, if needed.

Identify communications tools - Consider employee communications, e-mail, telephone, news release, news conference, Q&As, contact lists, Web site, etc.

Evaluation - Test your plan before an issue or emergency occurs. Once the issue or emergency is over, re-group the team quickly and do a post-mortem. This will force you to put your thoughts on paper while they are still fresh in your mind and will allow you to improve the process should another emergency occur.

2.2.1 Executive on Call Support Team (Executive Member on call Duty Roster)

The Executive on Call Support Team is gathered to provide expertise and support to Nalcor Energy's CEO upon notification of an incident and a determination of CEOC activation. Members of this team have specific assignments as it relates to communicating with key stakeholders.

Executive on Call Support Team is comprised of the following:

- CEO (Incident Commander)
- VP Finance/CFO (Financial Advisor)
- VP Lower Churchill (Technical Advisor)
- VP Oil and Gas (Executive Support)
- VP Strategic Planning and Business Development (Executive Support)
- VP, Corporate Relations (Executive Support)
- General Counsel (Legal Advisor)

2.2.2 Corporate Emergency Response Centre (CEOC)

The CERP assigns executives and senior managers to a Corporate Emergency Response Centre who initiate a response during an emergency.

The main communication roles and responsibilities of the CEOC are to:

- Maintain communications with the CEO Support Team
- Maintain communications with the incident commander on site
- Provide Emergency Communications Team (ECT) with resources for internal and external communications
- Interface with appropriate government agencies and industry colleagues as designated by the emergency response and potentially communication requirements

Through the Emergency Communications Manager and Communications Advisor, see *section 2.2.3 Emergency Communication Team (ECT)*, the CEOC draws on the expertise of the ECT to set overall direction, agree on messages and to provide support to the corporate spokesperson.

During a response, the CEOC in coordination with the Executive on Call Support Team, may call for the full operation of the ECT. During either of these levels of communications response, certain members of the ECT may go to the site and continue to liaise with the rest of its team members from the site.

During an emergency, members of either the Executive on Call Support Team, the Corporate Emergency Response Centre or the Emergency Communications Team may be responsible for establishing and maintaining contact with individuals and groups who may be directly or indirectly involved in the emergencies with the following guidelines:

- Only information signed off for release will be used in any communication with stakeholder groups
- Only the designated spokesperson will comment publicly on the incident following consultation and approval from the Emergency Communications Manager

Effective emergency response requires all teams and functions to work cooperatively in a team environment.

2.2.3 Emergency Communications Team (ECT)

During an emergency, an Emergency Communications Team (ECT) is formed by bringing together trained communications people. This team is led by the Emergency Communications Manager (Vice President, Corporate Relations or designate. Note: this person may be an external communication consultant) who is also an advisor to the Executive and is a member of the Executive Support Team.

Depending on the type and severity of the situation, and where the media are assembling, the ECT will be assembled at the Hydro Place head office, at the incident site or between both locations. A member of the ECT will always be available by telephone to offer advice at any stage of the emergency.

The following functions will be fulfilled by the Emergency Communications Team:

Role	Incumbent	Successor
Public Information officer	Dawn Dalley (DD)	External or KON
Liaison officer	Karen O’Neill (KON)	External or ES/CP
PIO Media Support	Erin Squires (ES)	External or CP
PIO /LO Social Media and Customer Support	Cara Pike (CP)	ES or JM
LO Family Support	Aimee Igloliorte (AI)	ES or JM
PIO Government Support	Janine McCarthy (JM)	Chris Kieley or Jim Keating
LO Community Support	TBD	MW
Support Experts (Technical/Environmental/Legal)	Gilbert Bennett, Frank Ricketts, Wayne Chamberlain, Jim Keating	As determined in CERP
Administrative Coordinator	Kathy Winsor	KP or AB
Spokesperson	TBD	TBD

Potential Contractors (in order by understanding of the business within Hydro/Nalcor Energy), contact information also found in Appendix 2:

Consultant	Work	Cell	Home	Email
Cathy Dornan, Cathy Dornan Public Affairs	████████		████████	████████████████████
Nancy O’Connor, MT&L	████████	████████		████████████████████

The Public Information officer assigns roles according to availability and background of team members. Depending on the severity of the emergency, Nalcor Energy communication officials may wish to contract the services of an external public relations agency to augment internal resources. The decision to involve a consultant should be made prior to an emergency and the consultant should receive the same training and preparation as the rest of the communications team.

To provide value in an emergency, the consultant should be familiar with Nalcor Energy’s procedures, protocols and personnel. It is recommended that communications consultants with strong media and government relations expertise be selected.

The variety of critical communications roles and responsibilities handled by the ECT will include:

- Providing ongoing communications counsel to the CEO Support Team and the CEOC
- Ensuring all site ECT roles are adequately staffed
- Ensuring the accuracy of information between site and head office
- Planning, coordinating and implementing media relations activities

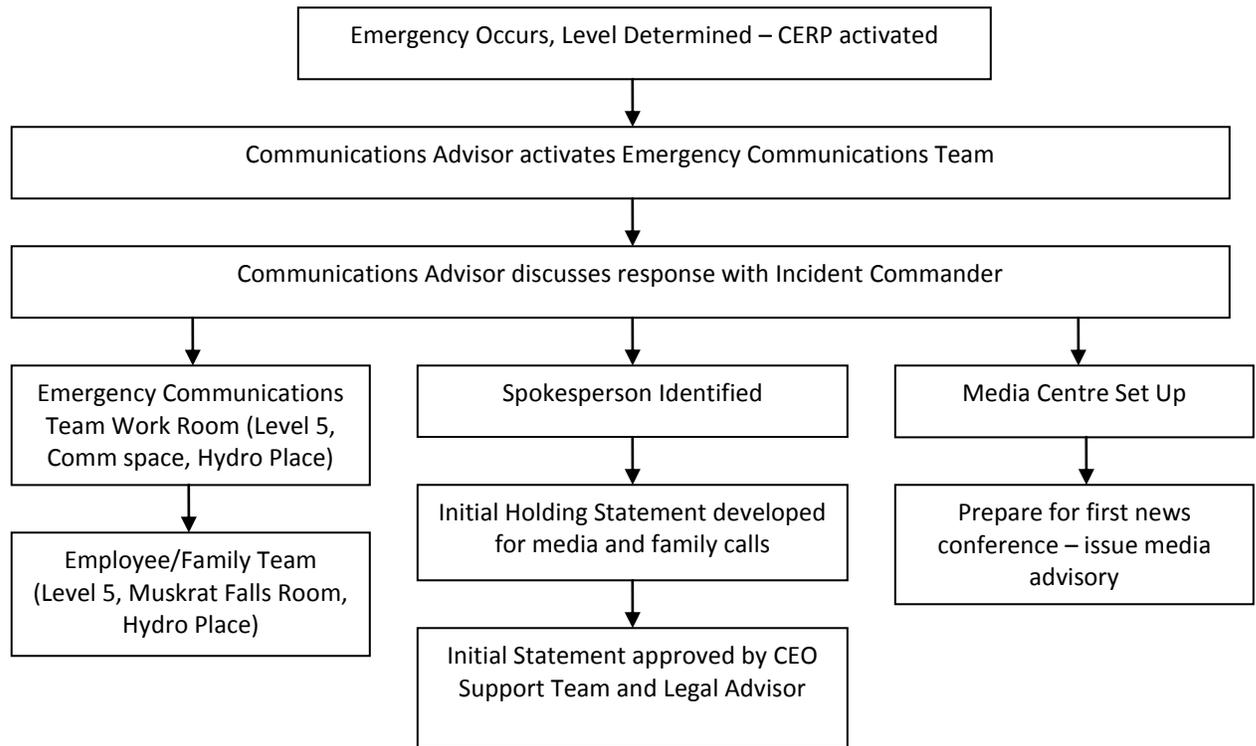
- Reviewing and summarizing media reports to provide the CEO Support Team and the CEOC quick and succinct assessment in the event that corrections are required, or response strategies need to be modified
- Identifying and recommending to the CEO Support Team and the CEOC appropriate actions concerning current and emerging public issues
- Identifying issues and addressing communications requirements of external stakeholders who perceive the situation has an impact on them
- Developing and disseminating written materials in order to keep internal and external stakeholders informed about the incident
- Ensuring that timely and accurate information is disseminated to local employees and their families

Members of the Emergency Communications Team will meet and work in the Corporate Communications work space on Level 5 of Hydro Place.

An emergency response kit is located in the common area of the Corporate Communications space on Level 5 of Hydro Place. The box contains power bars, extension cords, notebooks, pens, pencils, maps of the transmission and distribution system and regions where we operate, as well as extra copies of the Emergency Communication Plan and CERP.

There will also be a smaller portable kit with notebooks, pens, pencils, maps, extension cords and emergency preparation documents that can easily be transported to locations outside St. John's for possible on-site emergency communications.

2.2.4 Emergency Communications Quick Response Process



Timeline for an Emergency Communications Response

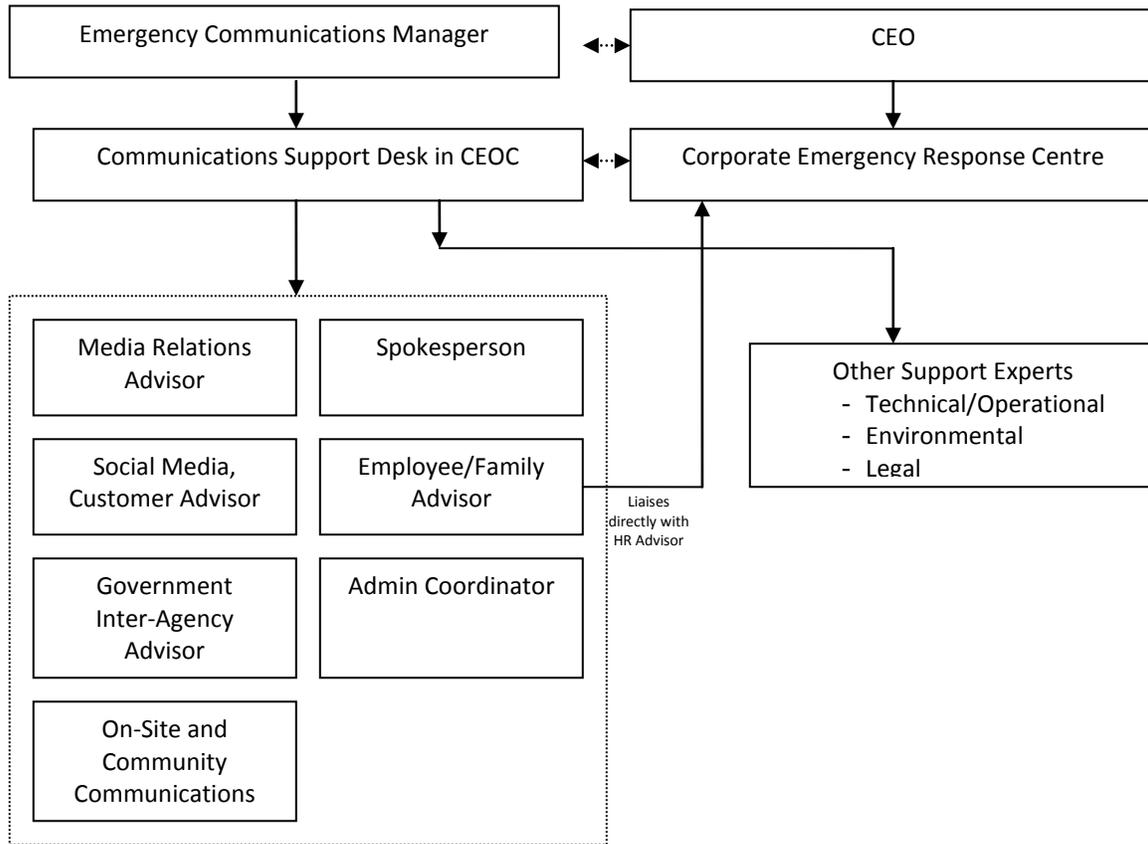
Within 2 hours of Emergency:

- First notification to shareholder/government(prior to public statement)
- First notification to employees and/or families (prior to public statement)
- Initial public statement release
- Initial statement made via social media
- First notification to key clients/ stakeholders (as, or prior to, public statement being made)
- News release/message posted on Web site and Twitter/Facebook
- Employee/Family dedicated line activated
- Media lines activated

Within 4 hours of Emergency:

- First news conference (if determined appropriate for the situation by the Emergency Communications Manager)
- ECT member dispatched to site if appropriate

2.2.5 Emergency Communications Team Reporting Structure



3.0 COMMUNICATING IN AN EMERGENCY - ROLES AND RESPONSIBILITIES

- 3.1 Emergency Communications Team (ECT) Functions
 - Emergency Communications Manager
 - Communications Advisor
 - Media Relations Advisor
 - Social Media and Customer Relations Advisor
 - Employee/Family Advisor
 - Shareholder/Government/Inter-Agency Advisor
 - On-Site and Community Communications Advisor
 - Administrative Coordinator
 - Support Experts (Technical, Environmental, Legal)
 - Spokesperson

3.1 Emergency Communications Team (ECT) Functions

Public Information Officer

Public Information Officer role is to be in charge of the management of the overall public response, message and public perception of the response activities. The person will work with the incident command team and address all areas of concern for public messaging, media and political contact. It is vital that the PIO remain focused on the public and media outreach and overall perception.

In order to ensure the PIO can be effective, there will need to be assistant PIOs in place. It will greatly depend on the level of incident and level of impact as to how many people will be required in the Assistant PIO positions.

The roles of these support team as follows:

- Media contact
- Political contact
- Document creator/Social media
- Administrative assistant
- Technical Support

The PIO manages Emergency Communications Team and is a critical link with the CEO and the Executive on Call Support Team to ensure needs of various stakeholders are met, and to protect the reputation of Nalcor Energy. *Note: This role could be filled by an external communications consultant if required.*

This role is typically filled by Dawn Dalley, with Karen O'Neill serving as the alternate contact.

Expected results:

- Timely and accurate communications to all stakeholders
- Ensure CEO and team are well briefed on communication issues
- Ensure CEO is prepared for media relations activities
- Communications strategy and implementation aligned with company principles and issues concerning reputation
- Utilizes external communications consultants as required
- Manage Political Contacts

Skills required

- Extensive knowledge of communications process and, in particular, a detailed working knowledge of media relations
- Coaching and facilitation skills

- Strong organizational decision making
- Solid understanding of operating procedures for a variety of operational emergencies
- Strong knowledge of emergency response organization

Liaison Officer

Liaison Officer role is to be in charge of the overall public response to supporting agency and stakeholders. The person will serve as the primary point of contact or all stakeholders. The Liaison Officer works closely with the Public Information Officer who is in charge of messaging for the response. It is the Liaison Office who will take the message forward to the stakeholders.

The Liaison Officer position will also require additional support. Very similar support to the PIO.

The roles of these support team as follows:

Stakeholder contact
Document creator/Social media
Administrative assistant
Technical Support

LO is a member of the CEOC and is a critical link between the PIO, the CEOC and ultimately the incident site. *Note: This role could be filled by an external communications consultant*

This role is typically filled by Karen O'Neill, the alternate contacts being Erin Squires, Cara Pike or Janine McCarthy – depending on the emergency. Erin Squires is the contact for Hydro and Churchill Falls related emergencies, Cara Pike is the contact for Oil and Gas and Bull Arm Fabrication-related emergencies, and Janine McCarthy is the back-up for Lower Churchill-related emergencies.

Expected results:

- Timely and accurate communications to the PIO
- Ensure CEOC decisions that are sensitive to communications issues
- Support the Deputy Incident Commander and On-Site Incident Commander in communication activities

Skills required

- Extensive knowledge of communications processes and emergency communication
- Thorough understanding of operating procedures for a variety of operational emergencies
- Thorough knowledge of emergency response organization
- Ability to manage a lot of information under pressure
- Strong organizational ability

PIO Media Support

Develops and implements head office media plan as required. This includes providing facilities and support required for media to accomplish their jobs effectively and efficiently.

Note: This role could be filled by an external communications consultant

This role is typically filled by Erin Squires or Cara Pike.

Expected results

- Ensure that the required facilities and equipment are available to accommodate media
- Develop communications strategies by identifying potential issues and trends in advance
- Liaison for all media inquiries

- Coordination and execution of effective media events such as news conferences, briefings and interviews
- Log and tracks all media calls
- Ensure that all media calls are responded to in an accurate and timely manner so that media understand the facts about the incident.
- Able to give background information to media, however they are not the official spokesperson.
- Arrange and assigns ECT members to accompany media to photo/video opportunities or site visits
- Ensure media monitoring is in place
- Review media clippings for accuracy
- Update media line regularly

Skills required

- Ability to speak clearly and concisely, particularly under pressure
- Must have a working knowledge of the emergency response organization including CERP and ECT and the on-site emergency response organizations
- Expert knowledge of media relations and extensive interview experience through regular duties
- Media relations and emergency communications training
- Strong interpersonal and leadership skills

LO Social Media and Customer Support

Develops strategy for communicating with social media stakeholders, customers, suppliers and contractors in a timely and accurate manner. Engages stakeholders through social media, implements activities to address the needs of interested clients not directly affected by the emergency.

This role is typically filled by Cara Pike, with Erin Squires or Janine McCarthy as the alternate.

Expected results

- Ensures social media channels are updated regularly with approved information
- All supplier/client inquiries are responded to and followed-up
- All suppliers/clients or industry groups who come to Nalcor Energy offices are promptly met and briefed
- Appropriate company personnel are prepared and briefed
- Proactively seeks opportunity for, and ensures accurate information is delivered to, key suppliers, customers, and industry group leaders, consistent with information received by media and employees

Skills required

- Excellent knowledge of public/government relations strategies
- Strong social media skills and knowledge of Nalcor's social media programs and guidelines
- Strong interpersonal and leadership skills
- Working knowledge of facilities, operating area, and the emergency response organization
- Excellent communication skills with an ability to speak clearly and concisely, particularly under pressure
- Good understanding of risk communications principles

LO Employee/Family Support

Identifies and recommends appropriate actions pertaining to current and emerging issues for employees and families.

This role is typically filled by Aimee Igloliorte, with Erin Squires or Janine McCarthy as alternates.

Expected Results

- Understanding of the ongoing emergency response effort both from an operations and a communications perspective
- Timely dissemination of information to all employees. Any public information releases should be released to employees and families, union leaders at the same time or earlier
- Regular contact with employees to dispel rumours
- Regular updates to the employee information line
- Ensures information is passed on to the Family Resource Centre (if activated), prior to, or in conjunction with media updated

Skills required

- Normally an Nalcor Energy employee who understands the organization's regular communications channels
- Trained as part of the communications team but a direct report to the HR Advisor in the CEOC

LO Shareholder/Government/Inter-Agency Support

This person develops strategy for communicating with government audiences in a timely and accurate manner. They would implement activities to address the needs of provincial, municipal and federal politicians and senior government administrators who may be affected by the incident.

This role is typically filled by Janine McCarthy (in conjunction with Social Media and Customer Relations Advisor role), with Chris Kieley or Jim Keating as the alternate.

Expected results

- All inquiries from government representatives responded to and followed up
- All government representatives that come to Nalcor Energy offices are promptly met and briefed
- Appropriate company personnel are prepared and briefed
- Accurate information is delivered to key government leaders, consistent with information received by media and the public
- Understanding of ongoing emergency response effort both from an operations and a communications perspective
- Regular contact with the community leaders and influencers to address and alleviate any concerns
- Regular contact with the community to dispel rumours

Skills required

- Excellent knowledge of government relations strategies
- Strong interpersonal and leadership skills
- Working knowledge of facilities, operating area, and the emergency response organization, including CERP and ECT
- Excellent communications skills
- Knowledge of government issues and current corporate initiatives involving governments
- Deep understanding of local community and community leaders and influencers
- Trained as part of the communications team

LO On Site and Community Relations Support

Ensures effective communications on site if required and provides support to the On-Site Incident Commander with media, community, employee and family communication.

This role is typically filled by TBD, with TBD as an alternate.

Expected results

- Liaise with media at the site
- Coordination and execution of effective media events such as news conferences, briefings, media tours and interviews
- Log all media calls and visits to the site
- Serves as a contact for community members and manages communications activities with the community, including local government and other stakeholders
- Ensures that media understand the facts about the incident
- Able to give background information to media, however they are not the official spokesperson.
- Arranges for ECT or site management to accompany media to photo opportunities
- Responsible for taking appropriate safety measures with media on site
- Updates Communications Manager, Advisor and Media Liaison regularly
- Assist with other on-site communication with community members, family, employees and ensure their queries are responded to as promptly as possible or they are directed to the appropriate holding location

Skills required

- Ability to speak clearly and concisely, particularly under pressure
- Must have a working knowledge of the emergency response organization including CERP and ECT and the on-site emergency response organizations
- Expert knowledge of media relations and extensive interview experience through regular duties
- Strong understanding of operations
- Media relations and emergency communications training
- Strong interpersonal and leadership skills

PIO and LO Administrative Support

Schedules all meetings and briefing sessions and distributes information to internal and external audiences, including faxes, news releases and status reports. This person acts as the main contact for switchboard to direct media, government and community calls. Updates internal bulletin boards and media room and orders, organizes and disseminates media clippings.

Expected Results

- Understanding of the ongoing emergency response effort both from an operations and a communications perspective
- Calls promptly directed to the most appropriate team member
- Calls answered with sensitivity to the caller's needs, including concern for timeliness, knowledge of the situation, and knowledge of the organization
- Information accurately written down to maximize effectiveness of return calls
- All information (faxes, news releases, communications updates, bulletin board notices, backgrounders, etc.) promptly and effectively distributed so response team members are up to date and able to perform their functions
- Facilities and equipment identified for emergency communications are set up efficiently
- Media clippings ordered and disseminated properly and organized.
- Provides general administration support to the ECT
- Keeps record of ECT activities.
- Handle phone lines for Manager and Coordinator (takes messages and checks voice mail).
- Direct land lines and cell phones to the media line

Skills Required

- Excellent knowledge of various information distribution processes
- General knowledge of background material at headquarters locations

- Knowledge of on-site computer hardware, software, e-mail, phone, fax, news release distribution methods, etc.
- Ability to remain calm and controlled while handling difficult calls
- Good time management and organizational skills
- General knowledge of organization, operating and the emergency response organization

PIO and LO Support Experts (Technical/Environmental/Legal/HR)

These individuals are likely members of the CERP but may not a full-time member, but are available throughout the emergency to provide technical information on products, processes and operating procedures. Interprets technical and scientific issues and concepts from the on-scene responder and team members to ensure company spokesperson can explain them simply and accurately to the public.

This role is filled in an as-needed basis, based on recommendations from Dawn Dalley and Karen O'Neill. Advisors in the communication response centre are responsible for establishing contact with support experts in an emergency. It is also important to have these team members available to ensure the activities that may be undertaken in their respective areas are aligned with the overall crisis communications approach.

Expected Results

- The company's credibility is enhanced because media and public receive clear information in a timely manner
- The ECT receives accurate and current information about the incident. Technical information is provided in concise and clear language
- Act as technical expert during media briefings

Skills Required:

- Thorough knowledge of the emergency response organization
- Solid knowledge of technical aspects of facilities and products involved
- Credibility with emergency response organizations
- Ability to simplify and explain complex technical concepts to any audience

Spokesperson

This individual is likely a full-time member of the CERP and throughout an emergency will act as lead spokesperson at news conferences and briefing sessions at the site. This person provides on-camera interviews to help implement media, community and government response plans. Likely to be the Incident Commander or Deputy Incident Commander.

Expected results

- Media interviews carried out effectively to convey accurately the company's response to external audiences
- Provides feedback to team members implementing media, government and community response plans

Skills required

- Ability to speak clearly and concisely, particularly under pressure
- Strong knowledge of media relations and experience with media through regular duties
- Working knowledge of the emergency response
- Media relations and emergency communications training

4.0 EMERGENCY COMMUNICATION SUPPORT

- 4.1 Communications Facilities
- 4.2 Training and Simulation Exercises
- 4.3 Documentation
- 4.4 Responsibility

4.1 Communications Facilities

At major operating facilities, emergency communications facilities should be set up and ready to use. At remote locations, where there may be little opportunity to set up facilities, alternative facilities need to be identified. Keep the following in mind:

- Modes of transportation and access to and from a remote location must be clearly identified.
- The Emergency Communications Team work room is located at Hydro Place, Level 5, Corporate Communications workspace.
- A media information centre and a news conference room would be the designated gathering point for media arriving on site. These facilities should be located away from the command centre and the ECT work room to ensure the media do not disrupt the operational emergency procedures ongoing and to appropriately limit access to company officials and ensure controlled access is maintained.
- Whenever communication is managed or communications personnel are dispatched on-site, the Mobile Emergency Kit will provide equipment and tools to support on-site communications efforts. For a checklist for the kit, see *Appendix 3: Emergency Kits*. The dispatched personnel should also bring their laptop and BlackBerry.
- Ideally there will be access to adequate wifi bandwidth for several outside users and ensure the security access can accommodate
- Will require access to land lines for confidential communications
- Access to printers is essential

Emergency Communications Centre

When the CERP and the ECT decide to run the majority of their operations from Hydro Place, an emergency communications centre will be set up in the Corporate Communications workspace on Level 5 of Hydro Place. When operations are managed remotely, the Emergency Communications Centre should be located in a space close to the CERP at the site of the emergency. See *Appendix 3: Emergency Kits* for a list of equipment for the Emergency Communications Centre. The multipurpose centre should:

- facilitate communicating with emergency response staff by phone, fax and other electronic mail as required
- accommodate meetings of the entire Emergency Communications Team provide areas for smaller working groups to function (either in meetings, on the phone)
- provide space to post information so team members can be updated on the current status of critical issues
- provide room for media monitoring and analysis

4.2 Training and Simulation Exercises

It is very important that individuals responsible for emergency communications duties are fully trained, have acquired the necessary skills, and are prepared to assume their role at any time.

The goal is to train all CERP and ECT members to perform their required duties by:

- providing training courses for emergency communications responders, including first response communications team members
- developing and recommending policies, guidelines, standards and strategies to help individuals acquire additional appropriate skills
- measure capability and communications preparedness

The following employees require regular emergency communications training:

- CERP members
- ECT members
- key senior management representatives

The effectiveness of Nalcor Energy's emergency communications response should be tested annually through simulation exercises. Tests can either be done specifically to assess communications response or as part of an overall emergency response simulation.

Tests should be realistic and include external stakeholders (such as media representatives, governments, interest groups, and other official responders) carrying out their real-life roles. This is necessary to ensure Executive on Call members understand the intensity and scrutiny involved in a crisis. It is also important for these members to understand the level of effort and time that will be dedicated to the crisis communications response.

The annual testing of emergency communications facilities is required to verify that quick set-up procedures, equipment and supplies are in place and in working order. Simulations that exercise the full complement of Emergency Communication are necessary and those that cover in principle a wide range of scenarios.

See *Appendix 5: Maintenance Schedule* for information on tracking and updating the plan and crisis testing.

Content

Emergency communications training will develop and improve skills to:

- *Establish credibility*

Credibility with key stakeholders and the public can be established by developing trust in the information they are being given. This can be achieved through credible third-party support, through establishing organizational credibility, and through establishing personal credibility. For example, third party spokespeople who comment on the incident will often be seen as being more credible than the company spokespeople or the government spokespeople. This makes it important to identify reliable third-party spokespeople who will help establish this credibility and work with the company to communicate effective and reliable messages.

Credibility is built by accurate, timely and open approach to communicating during an emergency. The personal credibility of your company spokesperson is also extremely important to consider. Is your spokesperson perceived to be an honest individual who is in control and who has the best interests of the people in mind? It is important to choose your spokesperson carefully.

- *Handle hostile questions*

Your spokesperson must not appear to be defensive in the face of hostile questions from reporters and people. Your spokesperson must express empathy or concern for the situation and demonstrate that

Nalcor Energy and the Corporate Emergency Response Team are doing everything they can to control and remedy the situation. Your spokesperson must not appear guilty by becoming uneasy with persistent questioning. The individual must be able to handle hostile questioning honestly and effectively.

- *Acknowledge, assess and manage risk*

Risk communication is an important component of this exercise. Often the public will perceive the risk of a situation to be greater than the reality of it. It is important that your communication activities educate as well as explain what the company is doing to ensure maximum public safety, and that the public understands the real risk involved.

- *Use required communications equipment*

It is important to be familiar with the environment, setting and equipment at your disposal. Training will ensure you are familiar with the fax machines, telephones, and computer equipment which you may have to use during the communications activities. Those required must also have access to other channels and/or social media used during an emergency (twitter/facebook).

- *Fine-tune your plan*

Training exercises ensure you are familiar with the procedures and roles and responsibilities of all involved in the exercise. Training also serves the role of fine-tuning the emergency communications process and ensuring it is the best possible tool to be used during an emergency. Feedback and constant evaluation of this plan will help ensure that all team members will be ready to communicate to its key stakeholders in the event of an emergency situation, and that this communications manual is easily implemented in conjunction with any operational requirements.

4.3 Documentation

During an emergency situation, it is important to document key facts and incident details in a timely fashion. It is also important to communicate it in a controlled and expedient manner. The information in *Appendix 4: Supporting Documents* will assist in this process as it has itemized what information will need to be documented. The appended information also provides checklists and contact information to assist during an emergency situation. It is important that information is as current as possible and that this current information is updated in a controlled fashion to all stakeholders.

Accurate, timely documentation could also be decisive factors after the emergency is over, in determining or resolving critical legal and insurance issues, which may arise following the emergency.

Reference materials

Prepared material includes the following:

- support material - reference materials for internal use only
- external use materials - reference materials that can be given to external audiences (media, public, government, etc.)

Support Materials

- support materials include site plans, operating details, CEPR, Emergency Communications Plan, maps, and contact lists

External Materials

Materials for external use provide background information to supplement public and media understanding of the emergency and Nalcor Energy's response. The following materials should be developed:

- emergency response capability and history of environmental incidents
- maps
- facility data
- profile of company and key operations

Identifying Stakeholders

During a major emergency, Nalcor Energy will be expected to communicate with numerous stakeholder groups affected by an incident. Key stakeholders and their issues should be identified before an emergency. This will allow Nalcor Energy to:

- focus on groups with whom to establish ongoing relationships
- plan procedures to reach stakeholders during an emergency by phone or by distributing written materials

4.4 Responsibility

Nalcor Energy's communications manager is responsible for establishing and maintaining systems and procedures to ensure that emergency communications plans are reviewed, updated and tested annually.

Communications is responsible for:

- recommending training
- providing training support
- ensuring ECT members are familiar with and have practiced the ECP
- ensuring communications processes integrate effectively with operational processes and that any changes in operational procedures are reflected in the communications response

- ensuring operational and management personnel understand the role of Emergency Response Communications and how it fits into the operational response; and ensuring that the capability to communicate during an emergency is maintained across the company.

Corporate Communications is also responsible for updating Emergency Response Communication information; verifying and updating key external contact lists; and confirming that facilities and equipment are in place.

Proper maintenance of the Emergency Communication Plan binder is critical to the effectiveness of the manual during a crisis. The manual should be reviewed every six months to ensure documents are up-to-date. Regular maintenance is particularly important for *Appendix 2: Contact Lists*. *Appendix 6: Nalcor Energy Corporate Emergency Response Plan (CERP)* should also be updated anytime the CERP document is updated.

In February and August each year, the Social Media and Customer Relations Advisor will provide the Corporate Communications team with any updated documents to be printed and placed in the manual, as well as any other time important documents (such as the CERP) have been updated. Also, to ensure familiarity with the plan in prior to a crisis or emergency, semi-annually, in May and October, the Emergency Communications Team will meet and review the Emergency Response Communication plan, individual roles and responsibilities, as well as supporting documents

Annually, the Emergency Communication Team will participate in a mock-crisis exercise, facilitated by a third-party, to practice executing the Emergency Communication Plan. The mock-crisis will help team members become comfortable with their roles and plan processes. The CERP is also executed annually by Nalcor Energy's Safety and Health Department and provides a good opportunity to practice the plan.

5.0 RESPONSE GUIDELINES AND TOOLS

- 5.1 Initiating the Communications Response
- 5.2 Sustaining the Communications Response
- 5.3 Developing Materials
- 5.4 Measuring Reactions
- 5.5 Issuing Public Statements/Draft Initial Holding Statement
- 5.6 Communicating Internally/Externally
- 5.7 Managing Public Requests for Information
- 5.8 Social media
- 5.9 Interviews
- 5.10 News Conferences
- 5.11 Providing Updates
- 5.12 Telephone Support and Lines
- 5.13 Nalcor Energy Media Policy

5.1 Initiating the Communications Response

The communications response is initiated through the CERP following a discussion with the Emergency Communications Manager and the CEO or Incident Commander.

5.2 Sustaining the Communications Response

In the event of a prolonged crisis, resources will be in place to deal with not only an escalating situation, but escalating public and media scrutiny. Sustained communications response is necessary when it appears the emergency is attracting public and media interest. It's important to establish appropriate coverage, shifts and handoffs as an emergency may be prolonged.

The ECT is responsible for all internal and external communications, and reports to the CEOC, including:

- Complete all outstanding calls and inquiries
- Update CEOC on the situation, issues and any commitments to the media or public
- Introduce ECT members to on site command members
- Decide on the continuing role of the First Response Team
- Ensure additional resources are in place

The ECT member on the CEOC provides communications advice as required.

5.3 Developing Materials

The process for releasing information to the media must recognize both national and local interest in the situation. ECT members will issue all news releases to local and national media and will also ensure that key media contacts across the country are informed as required/appropriate. The CEOC will ensure its stakeholder contacts are informed to ensure consistency of messages should the stakeholders (i.e. key client or emergency service) decide to issue a statement.

Key messages

Key messages are the messages that will be repeated through all methods of communications. The messages will help you reach your objectives. It's important that they be:

- Simple and easy to understand
- Supported by facts and accurate data
- Approved by legal

The spokesperson will always refer to these messages, even when media tries to detract from what the organization wants and needs to say.

Key messages can and should change as the situation evolves. The CEOC will need to pay close attention to details and adjust the key messages as necessary. Regardless of the key message, it should always follow this formula:

CAP formula

Concern (75%), Action (20%), Perspective (5%)

- The Concern messages help establish credibility and show that the organization cares.
- The Action messages instill confidence in the ability of the leadership to manage the problem.

- The Perspective messages are rather self-explanatory in that they are meant to add perspective to the situation (i.e. "we are grateful that there were no fatalities and that the people who were injured will make a full recovery".)

An effective way to manage the emergency is to develop several messages under each of the three categories described above. The message from the organization can vary but it always follows this format:

Concern - Action - Perspective - Concern

The spokesperson always opens with Concern messages (to establish credibility and show caring for those impacted), followed by Action messages (instills confidence), and Perspective messages. It's important to close by looping back to a Concern message so the message ends by reinforcing credibility. As a rule, the overall message should be comprised 75% of Concern messages, 20% of Action messages and 5% of Perspective messages.

It's also imperative that your messages include Proof Points; messages with substance. This allows you to test the credibility of the message. Once approved, these messages become the script for all communications: talking points, news release, employee communications, client communications, etc. This ensures consistency of message in that all audiences receive the same information.

5.4 Measuring Reactions

Measuring the reaction of the media and public during a sustained emergency response is essential. The ECT is responsible for:

- Tracking media coverage
- Monitoring public comments by politicians
- Contacting third parties (including politicians) to advise them of the situation in advance
- Tracking community reaction through telephone and community liaison activities
- Monitoring employee reaction

Gathering such information will help the ECT gauge the effectiveness of the company's response to-date and will afford Nalcor Energy an opportunity to correct inaccurate, unfair or misleading information.

The social media advisor will prepare hourly reports of social media conversations and updates.

5.5 Issuing Public Statements/Draft Initial Holding Statement

Any time an initial public statement is given it should be followed with a more comprehensive statement with approved details about:

- Cause
- Liability
- Damage
- Casualties
- Response activities

Draft Initial Holding Statement

[Insert News Release Title Here]

[MONTH, DAY, YEAR] - At [time], on [date] a _____ (fire, explosion, spill, release, loss of generation, etc) occurred at Nalcor Energy's _____ (location), located _____ kilometres _____ (east, west, north, south) of _____ (nearest town, city, landmark).

Nalcor regrets to inform the public that presently _____ (employees, contractors, members of the public) are being treated for injuries. The company cannot release the names and conditions of the people injured at this time.

The _____ (plant or incident scene) has been (stabilized, shut-down, made secure) and Nalcor and the local _____ (RNC, RCMP, Coast Guard, EMO, etc.) authorities are directing the emergency response.

The cause of the _____ (fire, explosion, spill, release, loss of generations, etc.) is not yet known and an estimate of damage is not yet available.

Nalcor will issue another statement in approximately [ideally one hour].

-30-

Media Contact(s):

[Name]

[Title]

[Company]

[Office phone]

[Cell phone]

[Email address]

5.6 Communicating, Internally/Externally

Internal communication is one of the most important aspects of emergency notification and response. Whenever possible, employees should be informed just prior to, or at the same time, information is released to the media and families should always be communicated with prior to any media release.

ECT members responsible for internal communications functions will:

- Provide recommendations on internal communication procedures
- Develop messages and arrange for approvals
- Initiate communications to employees

For external communications, local emergency authorities such as fire, police and hospitals, as well as government contacts should have advance warning of any announcement made to the media. This will

ensure that when they are contacted by the media for comment, they will be ready to respond and will be seen as integral to the emergency response effort.

5.7 Managing Public Requests for Information

During an emergency it is inevitable that the company will receive inquiries from concerned employees and their families, media, regulatory officials and the general public. The ECT will ensure that avenues for making inquiries such as telephone numbers and/or e-mail addresses are communicated early and that resources including personnel, equipment and up-to-date information are in place to respond effectively.

5.8 Social Media

Social media offers an opportunity to share information with audiences. Nalcor and Hydro are active on Twitter and Facebook. Through these applications, the Social Media and Customer Relations Advisor can provide efficient updates based on prepared and approved messages.

5.9 Interviews

Appointed spokespeople will need to be thoroughly briefed of the situation before responding to any media requests for interviews. It is the ECT's responsibility that the designated spokesperson is prepared.

5.10 News Conferences

Sustained response to an emergency will involve news conferences. The ECT is responsible for:

- Planning and conducting news conferences
- Coordinating opportunities to be part of other responders' news conferences, if practical

During the news conference, the designated spokesperson should answer the bulk of the questions. However, a team of technical and legal experts will be on hand to respond to more detailed questions, if need be. These experts will be an ad-hoc part of the ECT and will be coached to respond to questions from the media in the most appropriate fashion.

5.11 Providing Updates

Nalcor Energy should provide continually updated information as appropriate. In the case where media interest is widespread and intense, it may be advisable to hold periodic media briefings at regularly scheduled intervals. Even if there is nothing particularly new to report, checking in regularly to reiterate the facts as you know them will help keep speculation to a minimum and ensure you maintain control of the situation.

Third-party and stakeholder groups will likely be approached by media for interviews and comment on the emergency situation. As the emergency situation continues, increasing levels and layers of information will be sought out and explained to the public. It is important that Nalcor Energy continues to manage its information flow and ensures these third-party and stakeholder groups have accurate, up-to-date information.

Continuous updates can be provided through:

- Internal communications
- Responding to public requests for information
- Proactive media relations

5.12 Telephone Support and Lines

Central telephone lines will be established for the following stakeholders. The lines ideally will have the ability for an initial updates, voicemail capabilities and also the ability to “zero” out to an operator. Regular media contact lines will be forwarded to a central line for initial contact.

Stakeholder	Number	Voicemail Y/N	Toll-Free Y/N & #
Media			
Employees			
Family			

5.13 Nalcor Energy/Hydro Media Policy

Policy:

Nalcor Energy has established a formal process to deal with media inquiries. All media inquiries should be directed to Corporate Communication and Shareholder Relations.

Background

The media are an important means to reach stakeholders about our operations, in particular during emergency situations. Our relationship with the media aligns with our core values and is based upon mutual respect, honesty, transparency and trust. This policy will facilitate clear, consistent, accurate and balanced communication with media and stakeholders.

Scope:

This policy applies to all Hydro and Nalcor Energy employees.

Objectives:

1. To ensure that all public communication is planned, accurate and clear.
2. To ensure that the company perspective is clear, consistent, accurate and balanced.
3. To ensure that media inquiries are assigned to appropriate spokespersons.
4. To ensure that spokespersons are trained to speak with media on behalf of the company.
5. To facilitate a relationship with the media based on trust and mutual understanding.

Principles

In addition to our core values, interaction with the media will be guided by the following principles:
Mutual respect – we understand that media play an important role in informing the public.
Honesty – we will never knowingly mislead the media or stakeholders on an issue or news story.
Transparency – we promote openness and accessibility in our dealings with the media, at the same time as complying with the law and maintaining confidentiality when appropriate.
Balance – information provided to the media will be objective, balanced, accurate, informative and timely.

Directives:

1. Always contact Corporate Communication and Shareholder Relations before agreeing to do an interview. CCSR will confirm the appropriate spokesperson and develop appropriate messages. If you speak to the media in an unplanned situation (scrums, etc), contact the Corporate Communication and Shareholder Relations department immediately following your interview.
2. All major company initiatives will have a communication plan and related questions and answers prepared jointly by CCSR and related divisional/departmental staff. All plans and materials must be approved by the CCSR Manager as well as the CEO and/or leadership depending on the issue.
3. All press releases must be signed-off CCSR, the CEO and/or appropriate leadership approval is also required if she/he is quoted.

4. All media requests for information will be forwarded to the CCSR unless an employee has prior approval to speak to the media on a particular subject. For example, staff assigned to deal with regular updates and photo requests may have prior approval and they will provide an update to CCSR following any unplanned contact.

5. In any emergency or crisis situation, all media calls will be forwarded to Public Information Officer. If an employee is contacted during these situations, they will advise any media to make contact with CCSR directly.

6. If an issue is technical in nature, an appropriate spokesperson may be assigned. At no time will an employee be forced to speak to the media. If you agree to be a spokesperson, CCSR will assist you to prepare for an interview.

7. Guidelines for dealing with media calls are attached.

Inquiries:

Please direct all media inquiries or calls to the following media relations representatives:

PRIMARY CONTACTS:

Dawn Dalley, Manager, Corporate Communication and Shareholder Relations,

Email: [REDACTED]

Karen O'Neill, Senior Communications Advisor, Lower Churchill Project

Email: [REDACTED]

ALTERNATES (Nalcor to update)

Erin Squires, Senior Communications Advisor, Hydro

Email: [REDACTED]

Cara Pike, Communications Advisor, Oil and Gas, Social Media

Email: [REDACTED]

If these contacts are not available, please forward all calls directly to the CCSR department at 737-1311.

Understanding the Media

The key to effective media relations is to understand what the press wants. Knowing what they want in a story, or what has news value, and then making sure the information is provided to them in a clear and timely manner are essential.

Reporters search for stories that have audience appeal and generate readership, issues that provoke debate, controversy and even conflict. They avoid "old news" that has already been covered by other outlets.

There are specific elements that give a story news value. Timeliness, prominence, proximity, significance, unusualness, human interest, conflict and newness are all news values. For example, a news story about Southeast Asia is not generally on our evening news because it is not in close proximity to us or does not have a local angle. But if there is a significant or unusual event, such as the tsunami disaster, it will be reported.

Guideline for Communicating with the Media

1. Managing the Request - If you receive a request for an interview, you should direct the request to Corporate Communication and Shareholder Relations. CCSR will ask the following questions if a reporter calls to determine who should be speaking on the topic or if we should be responding.

- Who is the reporter and where does he/she work?

- What is the subject of the interview?
- Are you the appropriate person to answer questions about the topic?
- What will be the format of the interview?
- Where will the interview be conducted and how long will the interview be?
- Is it a feature story or a news story?
- What is the reporter's deadline?

Always ask yourself, is this interview a good idea for Nalcor? Does Nalcor have something to say? Can we use this opportunity to communicate with our stakeholders?

2. Prepare – If you are assigned to do an interview, take time to prepare prior to your interview.

- Refresh your memory. Keep up to speed on relevant material by reviewing the policy, program, initiative or project that you are being asked about.
- Background material. If you are worried that a reporter may require additional background material, please let CCSR know and they will work with you to provide background or follow up materials. CCSR may provide the reporter with information prior to the interview. Good research will lend credibility to a journalist's story.
- Anticipate difficult questions. List as many questions that you would rather not answer and then think about the best way to answer them. Think about how to turn the answer around to work your key messages into the answer. CCSR will assist you in preparation.

3. Consistent, clear messages - With assistance from Corporate Communication and Shareholder Relations key messages or talking points (three to four) will be developed. These points should be as brief as possible (when speaking, they should be 10-20 seconds). These will ensure that the information is clear and concise.

4. Deliver the Messages - When being interviewed, remember:

- Listen carefully to the questions before responding.
- Use only factual and informative answers.
- Don't offer personal opinions or comments.
- Don't speculate, make accusations, or attempt to answer hypothetical questions.
- Stick to your own area of knowledge and expertise.
- Do not attempt to answer questions that are beyond your own specialty or field. If you are uncertain or don't know an answer, tell the reporter that you'll look into it and get the information for them as soon as possible.
 - Do not engage in "off the record" discussions. Always assume that everything is "on the record".
 - If you realize you've made a mistake, say so and re-do the answer to that question.

5. Closing - After completing an interview, remind the reporter to contact you or CCSR again if they need clarification of any of your answers.

Feedback:

Corporate Communication and Shareholder Relations will periodically solicit informal feedback from management and/or supervisors, and will track clippings to monitor performance and effectiveness.

6.0 FOLLOW UP

- 6.1 Analysis and Review
- 6.2 Outstanding Issues
- 6.3 Wrap-up
- 6.4 Continuous Improvement

6.1 Analysis and Review

After the initial emergency, once the emergency response team has the situation under control and media and public interest have subsided, the Emergency Communications Team members are encouraged to:

- Analyze outstanding issues and identify any follow-up required
- Wrap-up activities and assess their effectiveness
- Identify opportunities for continuous improvement

6.2 Outstanding Issues

Analyzing outstanding issues will determine whether stakeholders need additional information about the emergency. Analysis might include:

- Media analysis - a detailed look at broadcast and print coverage can show factual errors that should be corrected or information gaps that need to be filled
- Public opinion and employee opinion - the benefits of conducting an independent survey of public attitudes should be considered, particularly if the incident is on-going or following the resumption of normal business activities, including a survey of employee reaction to the incident
- Third-party feedback - to continue to nurture relationships with third parties, review the incident with those who were involved, asking for both positive and negative feedback, and how the company might have responded differently

6.3 Wrap-up

An integral part of emergency communications response is the wrap-up. Consider issuing the following:

- Final news release - a summary news release that covers outstanding issues or information that needs further clarification. While this release may not attract much media coverage, it's mandatory for on-the-record reference material.
- Feature article - a summary of the way Nalcor Energy handled the emergency to further public understanding and reinforce Nalcor Energy's reputation as a responsive company.
- Internal follow-up feature article - a feature written for employee publications. The article will provide an overview of the company's performance during the emergency.
- Personal correspondence from a senior Nalcor Energy official sent to all affected by the incident.
- In the event of casualties, personal contact should be made.
- A thank-you letter should also be sent to public leaders and agencies that were helpful during the emergency.
- Face-to-face community contact, if warranted.

6.4 Continuous Improvement

A final review should be conducted to identify:

- Accomplishments and areas where Nalcor Energy met objectives in order to communicate effectively
- Opportunities for improving Nalcor Energy's emergency communications response

The communications review is usually conducted by the Emergency Communications Manager, for later review by the Corporate Emergency Response Team.

APPENDIX 1

EMERGENCY COMMUNICATIONS TEAM HANDBOOKS

The Emergency Communications Team Handbooks are a compilation of detailed instructions, including responsibility organizational charts, media response charts, contact lists, supply lists, tips, and fact sheets.

There are separate handbooks for each of the members of the Emergency Communications Team including:

- Public Information Officer (CEO)
- Liaison Officer (CERP)
- PIO Media Relations Support
- LO Social Media and Customer Relations Support
- LO Employee/Family Support
- LO Shareholder/Government/Inter-Agency Support
- LO On-Site and Community Communications Support
- PIO and LO Administrative Coordinator
- Support Experts (Technical, Environmental, Legal)
- Spokesperson

APPENDIX 2

STAKEHOLDER AND CONTACT LISTS

The stakeholder and contact lists are updated every six months by the customer and social media advisor. This appendix includes contact information important stakeholders and contacts for an emergency, including employees and potential external consultants:

- Emergency Communications Team
- Nalcor Energy leadership team
- Emergency response consultants
- Government of Newfoundland and Labrador
- Municipal contact information
- External stakeholders

APPENDIX 3

EMERGENCY RESPONSE PREPARATION

An emergency response kit is available in the Emergency Communications Team workspace on Level 5 of Hydro Place. There are two kits: one for use in the Emergency Communications Team workspace and the other that can be taken if travel is required for an emergency. This appendix includes item and maintenance checklists for the kits.

APPENDIX 4

SUPPORT DOCUMENTS

Copies of extra checklists and documents that may be required can be found in appendix 4, including:

APPENDIX 5

MAINTENANCE SCHEDULE

An important part of a crisis communication plan is regular updating and maintenance. This section includes a maintenance checklist to ensure the plans and appendices in each binder are updated regularly. The maintenance schedule sees that stakeholder contact information is updated every four months, and that the entire plan is reviewed annually.