Energy and Emergency Planning and Integration Crosswalk (EEPIC)

Implementation Plan

Implementation Plan

OVERVIEW

Energy planning involves a range of stakeholders including state agencies and offices, public utilities/service commissions (PUC/PSCs), emergency management agencies, and utilities, each doing compartmentalized planning with specialized documents, often without clearly defined objectives aligned with each other. The EEPIC is structured to bring those disparate planning processes together under a single energy security strategy, aligning and informing active planning concepts and processes to maximize their benefit. The framework is designed to scale to your state's specific priorities related to energy planning, oversight, and operations.

The framework establishes a shared foundation that every stakeholder builds from: the same priorities, the same understanding of state goals, and the same awareness of the constraints and context each partner operates within. When stakeholders understand the state's policy goals, and the state understands the constraints of its partners, everyone can move independently while still working towards the same outcome. That alignment has practical consequences: decisions are made faster and more informed, infrastructure and planning gaps are closed more effectively, and contradictory goals are surfaced and resolved before they complicate plans and response. The result is a cohesive energy security planning process, moving the state from scattered policy signals to coordinated operational reality.

This implementation plan builds onto the framework introduced in the User Guide, providing a roadmap for how to execute the planning process across four steps: Strategy Development, Module Engagement, Planning & Gap Analysis, and Integration & Maintenance. This is not an instructional manual; it's a guide of the key actions to take, people involved, and the focus of each step. Its steps can be revisited and built upon over time as state priorities evolve. This page provides an overview of each step; the following pages detail each step's approach and recommended actions to take.

1 Strategy Development

Establish the security strategy that will guide every decision that follows. The output is a documented strategy- Diversification, Economics, or Resilience- that gives every stakeholder a shared reference point and makes all subsequent module work in service of your state's goals.

2 Module Engagement

Apply the strategy to the framework modules to surface specific findings, design priorities, and planning gaps grounded in your state's actual conditions. The output is a set of concrete, strategy-specific findings for each module you engage, leading into the final planning review.

3 Planning & Gap Analysis

Compare module findings against what existing plans, regulations, and utility requirements actually say. Identify exactly what needs to change, who owns each item, and what process or authority can close each gap. The output is a prioritized, actionable list that drives integration.

4 Integration & Maintenance

Close the gaps by routing each one into the regulatory or planning process that addresses it, and embed the framework into the state's ongoing planning cycles so it remains a living resource. The output is real changes to how the state plans and shapes energy decisions.

1 Strategy Development

Approach

This step establishes the energy security strategy the state will use to guide their implementation of framework: Diversification, Economics, or Resilience. The strategy selected determines how each module is read, what gaps are flagged, and what priorities utilities are pushed towards.

Start by reviewing existing energy plan, executive orders, and legislative priorities alongside the governor's energy philosophy to understand what direction that state is already moving in. Use any hazard mitigation planning and risk assessment findings to understand what the system is facing. Then use the Energy Security Strategy Crosswalk from the User Guide to evaluate the strategies against those conditions and select the one that best reflects state priorities. The result is a clear strategy that carries executive backing.

Key Stakeholders

- **Governor's Office:** Provides executive policy direction and backing. The strategy should reflect or directly support governor's energy philosophy so it carries top-down authority.
- **State Energy Office (SEO):** Leads the crosswalk process, synthesizes stakeholder input, and produces the documented strategy and rationale.
- **State Emergency Management Agency:** Contributes the hazard and risk context that should shape strategy selection as a direct input.
- **PUC:** Assesses regulatory and operational feasibility. A good strategy gives the PUC something to act on during utility engagements.

Outcome

The selected strategy becomes the lens through which the entire framework is interpreted. Every stakeholder in the process can work from the same documented strategy, so that when planning decisions are made or questioned, everyone builds off the same foundation. Without it, module findings are merely observations.

Recommended Actions

- As a starting point for the Crosswalk, review documents such as current energy plans/policies, executive orders, and legislative priorities to determine whether a cohesive energy security policy already exists.
- Use hazard mitigation planning documents and risk assessment outputs to map the state's documented risk exposure against each strategy to understand which one will best address state risk exposure.
- Determine whether the chosen strategy will be guided by the existing planning direction, or to address major gaps in energy planning.
- Work through the Energy Security Crosswalk with relevant state partners, using the analysis above to assess each strategy against real conditions.
- Document selected strategy and the rationale behind it, using it as reference point for future work in the EEPIC and giving stakeholders confidence in the direction.
- Brief external partners (e.g., utilities) and relevant state agencies on the selected strategy before module engagement begins to set understanding of the strategic direction.

2 Module Engagement

Approach

Each module addresses a distinct dimension of energy security planning and surfaces different findings based on which strategy is applied; diversification lens identify different priorities than resilience would in the same module.

Start with the module that addresses your most urgent problem. For example, if you're concerned about communications infrastructure failures hindering grid operations, start with Interdependency Planning. You can do one, or all of the modules. Each module stands alone and produces findings for the planning review phase.

Ensure that the right stakeholders- utilities, PUC, and other state agencies-are engaged during this phase, as it affects strength and comprehensiveness of the modules' findings.

Key Stakeholders

- **State Energy Office (SEO):** Leads module engagement, determining sequencing of work, scoping lines of effort between stakeholders, and synthesizing findings for use in Step 3.
- **Other Relevant State Agencies & Offices:** Contribute sector-specific knowledge for the appropriate module. For example, Emergency Management Agencies should particularly advise on the Interdependency Planning.
- **Utility & Industry Partners:** Provide context on operational data, existing planning documents, and system knowledge that inform module considerations.
- **Federal Partners**: Engage on security-specific concerns and resources (e.g., guidance on cyber and physical threats) and to identify module-specific funding or technical assistance.

Outcome

Completing module engagement brings together the planning documents, requirements, and stakeholder perspectives that typically exist in silos and aligns them around a single strategy-driven approach. For each module, stakeholders coalesce around a common understanding of what matters and why, and everyone speaks the same language on the module's topic, like what the state's priorities are or what actions utilities or regulators need to take. That shared foundations give the state the needed direction to drive real action, like new utility standards or updated emergency response protocols.

Recommended Actions

- Identify the most pressing energy security problem the state faces and map it to the module that address it directly. This choice can be informed by the Strategy Development phase findings (e.g., what was or wasn't addressed in the analysis?).
- Review the selected module and identify which stakeholders need to be involved. Schedule their involvement and participation expectations before beginning. Establish lines of effort and roles before starting (i.e., who has authority over each section, how the work managed, etc.).
- Pull relevant planning documents that ground module work. Understand how they influence module-specific decisions.
- Work through the module with your strategy as the explicit lens. Ask what each section means specifically for your state and strategy, not just what it says generically. Document specific key findings, gaps, and open questions. Use this to inform the planning review phase.

3 Planning & Gap Analysis

Approach

This phase takes the findings surfaced in the module engagement and identifies how the state can action on them. For each finding or gap, compare it against existing plans, policies, or regulations, and ask: how do current capabilities address this condition, or what does closing this gap enable for state planning going forward?

This is where module findings become specific, addressable items. In the engagement phase, the state builds a strategy-grounded understanding of system needs. This step gives specific actions to address planning needs, like new utility reporting requirements on fuel security during disruptions. Each gap item is then assigned an owner who has authority to address it and a pathway to resolution.

Key Stakeholders

- **Governor's Office:** Provides executive support, engaging where gaps require executive action or legislation (e.g., engages with legislators to revise energy policy, etc.).
- **State Energy Office (SEO):** Convenes stakeholders and leads gap analysis process. Leverages stakeholder expertise to prioritize gaps based on feasibility and significance, and produce the action items list used in the integration phase.
- **Other Relevant State Agencies & Offices:** Provides sector-specific expertise implications for gaps. Identifies whether gaps can be solved through existing authorities or require new legislative action.
- **Utilities:** Engages with State Agencies to validate findings and provide necessary input on operational capabilities and constraints.

Outcome

The analysis produces a concrete, prioritized list of actions tied directly to the module findings and strategy. Each gap is assigned a stakeholder best positioned to address and action it (e.g., having the PUC revise integrated resource plan (IRP) reporting criterion). Address these gaps based on what matters most to advancing the strategy, as well as what's feasible for state financial, legal, and personnel constraints. Together, these actions represent new or updated policies, regulations, and planning commitments that give the state a clear path towards strategy enforcement.

Recommended Actions

- Review module findings with stakeholders to determine what's most critical to address. Prioritize based on what most prevents strategy enforcement. Be specific on what needs to be addressed so that it's actionable.
- For each priority, determine which stakeholder has the authority and responsibility to address it (e.g., state energy office can address planning gaps), and assign ownership.
- Work with stakeholders to assess existing documents related to the priority, compare them and confirm what exists, what's missing, or needs to be changed.
- Determine what levers (e.g., policies) are available to address the priorities, or what requires new authority (e.g, governor granting the energy office oversight powers).
- Establish a regular cadence for stakeholders to report progress or convene for working sessions on their assigned priorities. Consistent coordination ensures gaps are addressed.

4 Integration & Maintenance

Approach

This phase is where the priorities list items become real changes in how the state plans and coordinates. Each item is routed to the process that can close it and tracked until it's resolved.

Sustaining means keeping the framework relevant by building a review into the state's planning calendar aligned with gubernatorial transitions. Revisit the strategy and module findings whenever a new administration's energy philosophy shifts, and adjust where priorities no longer align. This embeds the framework in state energy planning processes and gives stakeholders and existing plans a shared, unified reference point to build from.

Key Stakeholders

- **Governor's Office:** Leads efforts in actions requiring executive or legislative action into appropriate channels (e.g., establish task forces, engage state legislators, etc). Sets energy philosophy that anchors future strategy revisions.
- **State Energy Office (SEO):** Works with stakeholders to ensure implementation of priorities. Maintains the module and strategy document as active planning resources, and leads review efforts when administrations set new direction.
- **PUC:** Carries regulatory needs from the planning review into proceedings. Approaches all future and ongoing cases with the established strategy in mind, referencing it in decisions and letting it guide regulatory direction.
- **All Other Relevant stakeholders:** Ground existing plans and future considerations in the state's established strategy and module findings.

Outcome

The first outcome is executing on the priorities list from the gap analysis phase. The second outcome focuses on what this execution builds. These changes produce a documented foundation of priorities, and defined strategy that every stakeholder references going forward when conducting planning. To keep it current, the strategy and findings are reviewed at every gubernatorial transition to assess where adjustments must be made.

Recommended Actions

- Execute on each assigned priority item from the planning and gap analysis. Work with the assigned stakeholder to align implementation to existing planning cycles or proceedings so changes can be readily absorbed into what already exists.
- Set realistic timelines for each priority grounded in stakeholder capacity to reduce the burden of implementation.
- Stakeholders should determine whether the scale of assigned priorities requires larger efforts to address, such as dedicated planning initiatives or legislative authority, rather than revising existing processes.
- Track and report the status of assigned priorities across stakeholders. Find appropriate mechanisms to remove barriers, or adjust actions, on stalled items.
- Identify external mechanisms that can support strategy advancement, such as federal funding programs or regional coordination opportunities, that may provide resources or incentives to make implementation more feasible.

Implementation Success

The outcome of implementing the EEPIC depends on which strategy the state choses, the state's individual context, and the module engaged. This page outlines what successful implementation looks like for each module, outside of state-specific contexts or constraints. Use the descriptions below to understand what each module delivers when the state carries it through the full implementation process, from engagement through integration.

MODULE 1: Design and Integration

Infrastructure planning is no longer fragmented across competing stakeholder priorities. Every stakeholder that shapes grid design (i.e., SEO, PUC/PSC, utilities) understands their role and translates the strategy into actions at the level of the system where they have the most impact. That shared understanding makes the strategy visible in what actually gets built, as new or updated standards direct what utilities build and plan for. This module is the most physically noticeable execution of an energy security strategy, as it translates policy directly into physical infrastructure and policy changes.

MODULE 2: Energy Risk and Criticality

State energy stakeholders operate from a shared definition of risk and a common method for determining which assets matter most to grid operations through the completion of the Consolidated Risk Spectrum. Because everyone will measure risk the same way and understands asset vulnerability through the same lens, risk stops being assessed in disparate, disconnecting ways across organizations. That shared understanding is what allows the state to set risk-based priorities and standards that everyone can be held to.

MODULE 3: Restoration Prioritization

This module helps the state know exactly how power gets restored, and to whom, before the next disruption occurs. The Prioritization Crosswalk brings utilities and emergency management together to defined shared restoration criteria, reconciling how utility operational constraints, community needs, and government authority all factor into restoration processes. Those criteria are developed in advance of an emergency, so when outages occur, the state and utilities are executing a shared decision-making process instead of negotiating under pressure.

MODULE 4: Interdependency Planning

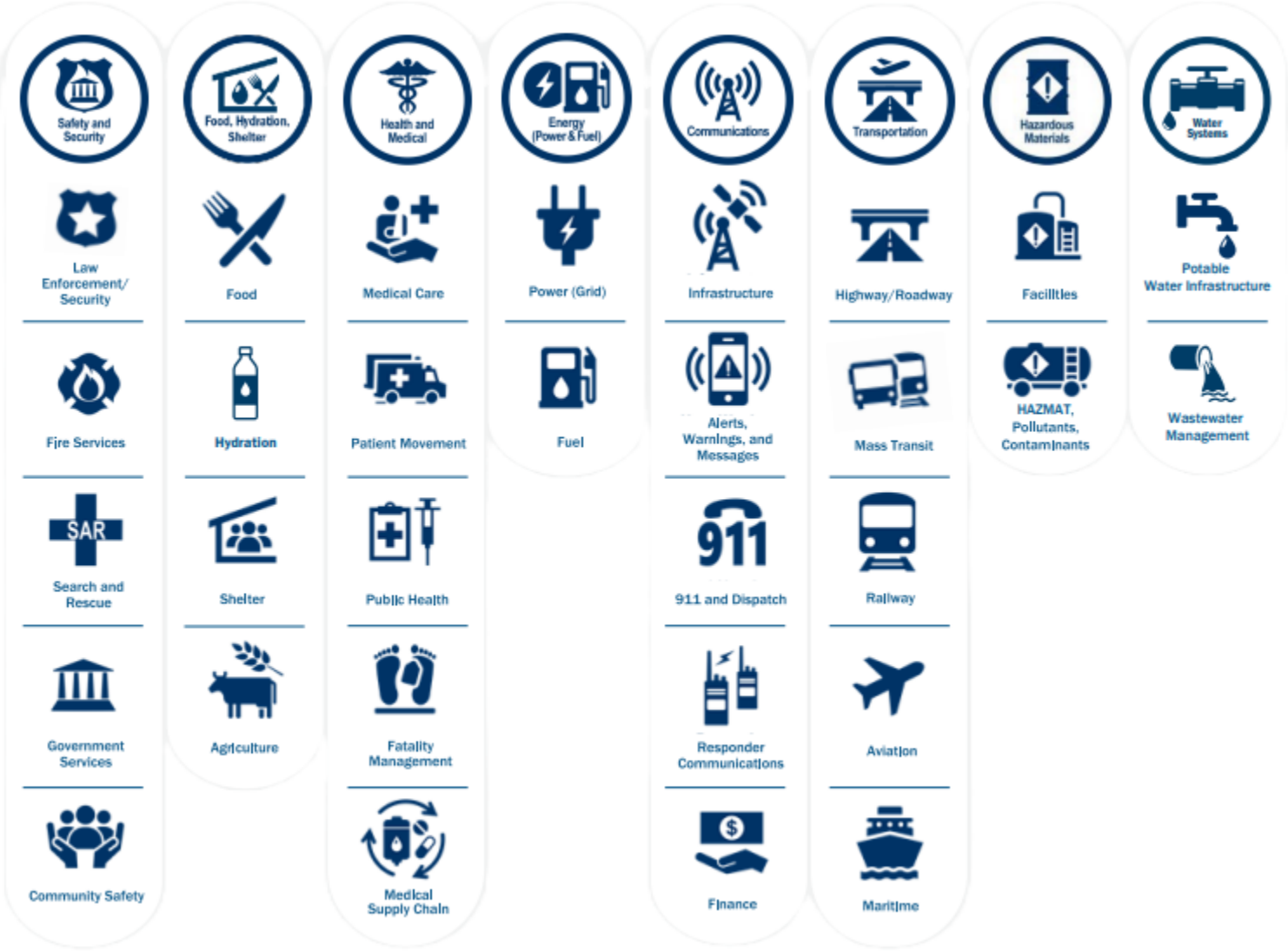
Every stakeholder understands the discrete assets and capabilities that are tied to grid operations from the communications, energy, and transportation sectors. Likewise, utilities know how they depend on these sectors' assets, and the state has better visibility on how these stakeholders coordinate and depend on each other. That shared, cross-sector clarity enables each stakeholder to revise existing plans and standards, or create new ones, to address the uncovered risks and disruption vectors, strengthening state policy, emergency response processes, and each sector's contingency plans.

Annex

A

FEMA Community Lifelines

FEMA COMMUNITY LIFELINES



LEGEND

≥5 Lifeline sub-categories Impacted

High Risk

3-4 Lifeline sub-categories Impacted

Medium Risk

1-2 Lifeline sub-categories Impacted

Low Risk

Annex

B

Key Stakeholder List

State Agencies & Offices		
Stakeholder	**Role In Energy Planning**	**Key Engagement questions**
Emergency Management	Leads consequence management for energy emergencies and hazard mitigation planning, connecting energy risk to the state's broader all-hazards planning	• What hazard and risk assessments (e.g., THIRA) do they maintain that inform energy planning? • What resources can they provide or coordinate during an energy emergency? • How is energy risk currently integrated into their existing emergency operations plans?
Governor's Office	Sets energy policy direction through executive orders and legislative priorities, providing the top-down authority behind a state's Energy Security Strategy	• What energy priorities has the Governor already articulated through executive action or policy? • What authority is needed from this office to advance planning goals? • How should progress or priorities be communicated to maintain executive backing?
Public Utilities/Service Commissions (PUC/PSC)	Regulates utilities and sets enforceable performance and design standards, approving utility planning documents such as IRPs	• What regulatory levers (approvals, rate cases, etc.) can they use to advance state priorities? • What existing utility filings or dockets are relevant to current planning efforts? • What is their process for incorporating new state guidance into utility requirements?

State Energy Office	Leads energy security planning, manages federal grants, and coordinates across agencies on infrastructure goals	• What existing plans (e.g., SESP) or data do they maintain that should inform this effort? • What is their role and capacity in convening other stakeholders for this process? • What federal funding or programs are they positioned to pursue in support of state goals?
Federal Partners		
Stakeholder	**Role In Energy Planning**	**Key Engagement questions**
Department of Energy (DOE)	Provides technical assistance, research, and funding for grid modernization, resilience, and cybersecurity	• What funding, grants, or guidance are currently available that align with state goals? • What technical assistance programs could support planning or implementation? • How does the state coordinate with regional or headquarters-level DOE offices?
Federal Emergency Management Agency (FEMA)	Provides hazard-based awareness and informs how disasters affect energy infrastructure	• What hazard mitigation or lifeline data do they maintain that's relevant to energy risk? • What federal assistance programs apply to prolonged energy disruptions? • How should the state coordinate with FEMA during a declared emergency?
Federal Energy Regulatory Commission (FERC)	Regulates interstate and wholesale markets, issuing transmission planning rules and interconnection standards	• What current or pending FERC orders affect state transmission or interconnection priorities? • Where do state authorities align or conflict with FERC's jurisdiction? • How does the state track and respond to relevant FERC proceedings?

Grid Operators		
Stakeholder	**Role In Energy Planning**	**Key Engagement questions**
North American Electric Reliability Corporation (NERC)	Sets and enforces reliability standards for the bulk electric system, including risk assessment and Black Start planning requirements	• What NERC standards or assessments are most relevant to state risk and reliability priorities? • How can state-level planning reference or align with NERC compliance requirements? • What visibility does the state have into NERC's reliability assessments for its region?
Regional State Committees (Supporting ISO/RTOs)	Represents state PUC and appointed officials within an RTO region, acting as a unified voice on transmission planning and operations	• How are state priorities communicated to the state RSC representative? • How can the state ensure its Energy Security Strategy is reflected in RSC positions?
Utilities		
Stakeholder	**Role In Energy Planning**	**Key Engagement questions**
Electric Cooperatives & Municipal Utilities	Operate transmission, distribution, and generation assets in rural or municipal areas, typically outside direct state regulatory oversight	• What are their operational capacity and constraints relative to state priorities? • What voluntary or incentive-based mechanisms exist to engage them, given limited regulatory leverage? • What data or plans do they maintain that could inform statewide risk or restoration planning?
Investor-Owned Utilities (IOUs)	Own and operate transmission, distribution, and generation infrastructure, developing IRPs subject to PUC approval	• What planning documents do they maintain to inform this effort? • What operational or financial constraints shape their willingness to adopt state priorities? • What is their process and timeline for incorporating new requirements or guidance?

Annex

C

Key Resources List

State Agencies & Offices	
Resources	**Description**
Executive Orders	Directives issued by the Governor's Office to set or reinforce state energy security goals and legislative priorities
Hazard Mitigation Plan(s)	State/local Emergency Management documents identifying a jurisdiction's hazard exposure and risk profile
State Energy Security Plan (SESP)	Identifies a state's energy resilience priorities and risks based on pre-identified hazards to infrastructure
Threat and Hazard Identification and Risk Assessment (THIRA)	Describes the types of risk a state has identified from hazards and threats
Vulnerability and Risk Assessment (VRA)	Identifies critical assets and sites supporting energy infrastructure, informed by THIRA findings

Federal Partners	
Resources	**Description**
FEMA Hazard Plans/Guidance	General emergency management planning and preparedness guidance providing hazard-based awareness of impacts to energy infrastructure
FERC Orders	Transmission planning rules and interconnection standards issued by FERC for interstate and wholesale markets

Grid Operators	
Resources	**Description**
NERC Reliability Assessments	Examines overall potential long-term and seasonal risks and impacts to the bulk power system
Regional Transmission Plans	Transmission infrastructure planning documents developed by ISO/RTOs, identifying constraints across the regional transmission system

Utilities	
Resources	**Description**
Integrated Resource Plan (IRP)	Utility planning document submitted for PUC approval, addressing generation, transmission, and resource adequacy needs
Utility Filings	Regulatory submissions utilities make to the PUC as part of planning and infrastructure approval processes