



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 14-72-A

April 28, 2015

Investigation by the Department of Public Utilities on its own Motion to Revise Guidelines for Electric Companies' Emergency Response Plans.

ORDER ADOPTING FINAL REVISED EMERGENCY RESPONSE PLAN GUIDELINES FOR ELECTRIC COMPANIES

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I. INTRODUCTION

On September 22, 2014, the Department of Public Utilities (“Department”) issued an Order opening an investigation to revise the Emergency Response Plan Guidelines (“ERP Guidelines”) for electric distribution companies (“Companies”)¹ established in Final ERP Guidelines, D.P.U. 10-02-A (2010), and included proposed revised ERP Guidelines (“Draft Revised ERP Guidelines”). Emergency Response Plans (“ERPs”) are to be designed for the safe and reasonably prompt restoration of service during an Emergency Event. G.L. c. 164, § 85B; 220 C.M.R. § 19.04(1). Pursuant to G.L. c. 164, § 85B, Companies are required to submit an ERP by May 15 each year to the Department for review and approval. The purpose of the revised ERP Guidelines is to incorporate lessons learned from ERP implementation and recent Department storm investigations, Department directives, and recent legislative requirements for ERPs.

II. BACKGROUND

On September 22, 2014, the Department issued an Order opening this investigation, including proposed Draft Revised ERP Guidelines. Order Opening a Notice of Inquiry to Revise Guidelines for Electric Companies Emergency Response Plans, D.P.U. 14-72 (2014).² The Companies submitted joint comments (Initial Joint Comments) and the Attorney General of the Commonwealth of Massachusetts (“Attorney General”) submitted comments (Attorney General

¹ The investor-owned electric companies doing business in the Commonwealth are Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource Energy, and Fitchburg Gas and Electric Light Company d/b/a Unitil.

² See Order Opening Investigation for a full discussion of background information regarding ERPs. D.P.U. 14-72, at 1-3.

Initial Comments) on the Draft Revised ERP Guidelines.³ On March 19, 2015, the Department held a technical session during which the Department, the Companies, and the Attorney General discussed the Draft Revised ERP Guidelines. Based on the technical session discussion, the Companies submitted joint reply comments (“Reply Joint Comments”) and the Attorney General submitted comments (“Attorney General Reply Comments”).

During the technical session, the participants responded to questions raised by the Draft Revised ERP Guidelines and the Initial Joint Comments, and clarified their respective concerns about the ERPs and their implementation. In this Order, we adopt the proposed Draft Revised ERP Guidelines as Final Revised ERP Guidelines without discussion where neither the Companies nor the Attorney General raised any concerns with the revisions. In this Order, we also address concerns raised in the Initial Joint Comments but not discussed at the technical session, and concerns discussed at the technical session and covered in the reply comments. These issues include reporting requirements, damage assessment, estimated times of restoration (“ETRs”), and non-priority wires down.

III. REQUESTED CHANGES TO PROPOSED REVISED ERP GUIDELINES

A. Reporting Requirements

The Department’s Draft Revised ERP Guidelines included three types of reports: (1) pre-event reports; (2) restoration stage reports; and (3) post-event reports, including the event-summary report and the final event report. The Companies expressed concerns with the pre-event and restoration stage reporting schedules, the creation of the event summary report, the

³ Additionally, the Town of Carlisle and the Fire Chiefs Association of Massachusetts submitted comments in this docket. However, these comments pertain to matters covered in a separate, ongoing docket: Straw Proposal Regarding Proposed Storm Restoration of Service Benchmark, Proposed Priority Wires-Down Benchmark, and Draft Regulations, 220 C.M.R. § 19.00 et seq., Standards of Performance for Emergency Preparation and Restoration of Service for Electric Distribution and Gas Companies, D.P.U. 14-66.

five percent threshold for submitting both the event summary report and the final event report, added final event report categories, and the provision requiring the Companies to submit any report upon Department request (Initial Joint Comments at 10-16; Reply Joint Comments at 2-3).

The Draft Revised ERP Guidelines proposed that the Companies submit pre-event reports no less than every eight hours. In their Reply Joint Comments, the Companies note that this schedule is not practical and does not necessarily provide useful information to the Department (Reply Joint Comments at 3). The Department recognizes that during the days preceding an anticipated Emergency Event, circumstances vary widely depending on the nature of the anticipated event and the proximity of the start of the event, and that in certain instances, the three times daily pre-event reporting requirement is unnecessary and the reports can be duplicative. Therefore, in order to obtain information included in the pre-event report such as event type, weather forecasts, resource readiness, and anticipated problems in the most efficient and effective manner, the Final Revised ERP Guidelines require Companies to file pre-event reports at the following times and/or under the following circumstances: (1) daily at 5 a.m. and 5 p.m., or more frequently as requested by the Department, and (2) whenever the Company changes the Event Type.

The Draft Revised ERP Guidelines proposed altering the required timing of providing Table 3-B (which identifies resources available during an Emergency Event) to require the Companies to submit the table every four hours at specified times. The Department agrees with the Companies that submitting Table 3-B every four hours may be unduly burdensome, as compiling the table is a largely manual process. Therefore, the Final Revised ERP Guidelines require the Companies to submit Table 3-B every eight hours at specified times, rather than every four hours. The Companies are required to submit Table 3-A (which contains outage information) every four hours.

The Companies also request that we remove a new post-event reporting requirement proposal included in the Draft Revised ERP Guidelines – the Event Summary Report due 14 days following an Emergency Event. The intent of this report was to provide the Department with additional information prior to submission of the Final Event Report. The proposed Event Summary Report included consolidated service restoration stage reports, a summary of priority wires-down response, and a summary of resources. The Companies assert that this additional report would provide no benefit to the Department, and that they could not complete a meaningful report within 14 days (Initial Joint Comments at 12; Reply Joint Comments at 3). While the Department requires the information that would have been included in the Event Summary Report, we recognize the Companies' concerns with respect to the benefits and timing of this additional report. Therefore, the Final Revised ERP Guidelines do not require the Event Summary Report and the information from the Event Summary Report will be submitted as part of the Final Event Report, which is due 30 days following an Emergency Event.

Further, with respect to the Final Event Report, the Draft Revised ERP Guidelines proposed that the Companies submit the report following any event in which five percent or more of a Company's customers experience service interruptions.⁴ The Companies state that a reporting threshold of five percent of customers is not consistent with the event classification types, and outages of five percent of customers may not constitute an Emergency Event (Initial Joint Comments at 12-13). The Companies also require a clear trigger for initiating staffing protocols prior to an event to allow for the eventual compilation of a Final Event Report, and the Companies assert that they do not know whether an event will result in five percent customer

⁴ In their Initial and Reply Joint Comments, the Companies make the same argument with respect to the Event Summary Report (Initial Joint Comments at 11-12; Reply Joint Comments at 3). However, as we have removed that report from the ERP Guidelines, we need not address the threshold for the deleted report.

outages in advance of the event (Initial Joint Comments at 12-13; Reply Joint Comments at 2). The Companies request that the Department automatically require Final Event Reports only for Type 1 and Type 2 events, and for Type 3 events upon Department request (Initial Joint Comments at 12; Reply Joint Comments at 2-3). Given the amount of information required in a Final Event Report, and the resources the Companies require to compile such information, we adopt the Companies' recommendation. The Final Revised ERP Guidelines require the Companies to submit a Final Event Report following any Type 1 or Type 2 event, and following a Type 3 event upon Department request.

With respect to the Final Event Report, the Companies state that they are unable to provide two required items: number of broken pole trouble calls, and an explanation of how each Company ensured non-priority wires-down calls did not pose a public safety threat during the Emergency Event (Initial Joint Comments at 14; Reply Joint Comments at 3). Because the Companies do not collect such information during an event, and because they are required to submit sufficient additional information regarding equipment damage and wires-down performance, we remove these two items from the Final Revised ERP Guidelines. We note, however, that the Draft Revised ERP Guidelines proposed that the Companies describe in their ERPs the process for responding to customer-reported (i.e., non-priority) wires-down calls. In order to ensure public safety, the Final Revised ERP Guidelines maintain this proposal and also require each Company to describe in its ERP how, in practice, it ensures that non-priority wires down do not pose a public safety threat.

Finally, with respect to general reporting requirements, the Draft Revised ERP Guidelines proposed that the Companies provide any pre-event, restoration stage, or post-event report upon Department request, regardless of event type. The Companies argue the following with respect to this requirement: (1) the ERP Guidelines are applicable only to Emergency

Events, and Type 4 and Type 5 Events are, by definition, not Emergency Events and therefore should not carry any reporting requirements; and (2) requiring the Companies to submit reports upon Department request may not give the Companies sufficient notice to designate resources to collect required information, and therefore, the Companies would be effectively required to collect the information in every instance (Initial Joint Comments at 4, 10-11). The Companies note that they necessarily expend significant time and resources to gather data for and prepare the various required reports (Initial Joint Comments at 5-6). The Attorney General argues that the Department should adopt reporting requirements that apply to Type 4 and Type 5 events in order to provide the Department with advance notification (Attorney General Reply Comments at 2).

Given the resource-intensive nature of compiling many of the various required reports, and the Companies' request for a level of certainty with respect to preparing for reporting, the Final Revised ERP Guidelines do not include the requirement to provide any pre-event, restoration stage, or post-event report upon Department request, regardless of event type (Initial Joint Comments at 11). However, the Department notes that there are instances prior to, during and following an Emergency Event or a Type 4 or 5 event, where the Department requires some information, such as anticipated event type, outages, resource requirements, etc. In their Reply Joint Comments, the Companies agree that they will provide the Department with requested information on an informal, ongoing basis (Reply Joint Comments at 3). The Department appreciates and expects the continued cooperation of the Companies to provide requested information during future events.

B. Other Requirements

The Companies raised additional issues regarding various other aspects of the Draft Revised ERP Guidelines, including (i) damage assessment, (ii) Key and Command Position

checklists and position descriptions, (iii) ETRs, (iv) crew resources, (v) contact lists, and (vi) the timing of annual meetings. The Companies disagree with the Department's proposal that the damage assessment period should begin when it is safe for the Company to deploy personnel to respond to emergency calls (such as downed wires) or to perform restoration activities, whichever comes first (Initial Joint Comments at 8; Reply Joint Comments at 4). The Companies argue that emergency call response occurs regardless of weather conditions, and may necessarily occur before it is safe to perform damage assessment or other restoration activities (Initial Joint Comments at 8; Reply Joint Comments at 4). Therefore, the Companies request that the damage assessment period begin only once it is safe to perform restoration activities (Initial Joint Comments at 8; Reply Joint Comments at 4). We agree with the Companies and in the interest of safety the Final Revised ERP Guidelines require that the damage assessment period shall begin when it is safe to undertake restoration activities.

The Companies also request clarification regarding role descriptions and checklists that must be included in each ERP (Initial Joint Comments at 6-7). The Draft Revised ERP Guidelines and the accompanying Order did not clearly articulate which position descriptions and checklists were required in the ERP. The Final Revised ERP Guidelines require that the ERP include position descriptions and checklists, with associated forms and documents, for the Incident Commander and all Command Positions. Each Company may choose to include this information for Key Positions in its ERP, or, alternatively, provide the requisite information outside of the ERP.⁵

⁵ Companies must, if they choose to omit Key Position descriptions and checklists from the ERP, comply with additional requirements found in the Final Revised ERP Guidelines at Section IX.d.

As a result of the 2012 Act, the Draft Revised ERP Guidelines proposed two additional provisions. The Draft Revised ERP Guidelines included the statutory requirement that each Company provide ETRs to customers at least three times daily, and also require that each Company develop and disseminate, in a timely manner, initial and updated ETRs. The Companies request that the Final Revised ERP Guidelines specify that the statutory three times daily equates to “a timely manner” (Initial Joint Comments at 8-9). We decline to adopt the Companies’ recommendation. There are foreseeable circumstances under which a Company would necessarily update ETRs more than three times daily in order to provide timely information to customers. ETRs are a crucial communication tool during an Emergency Event, and each Company’s ERP should include procedures for updating ETRs when operational circumstances change enough to impact global, district, or town-level ETRs.

The Draft Revised ERP Guidelines also included a statutory⁶ provision requiring the Companies to identify the number of workers available to respond to an emergency within 24 hours. The Companies note that the language of the statute uses the term “service workers” which, according to the Companies, specifies a certain type of position with specific qualifications and training, and that the Final Revised ERP Guidelines should reflect the statutory language. We agree and the Final Revised ERP Guidelines use the statutory term “service workers” for this requirement.

The Draft Revised ERP Guidelines remove a former requirement that Companies file several voluminous contact lists with the Department annually. The Companies object to the elimination of this requirement (Initial Joint Comments at 15). The Department sees no benefit in continuing to receive these lists, especially given the fact that the Companies update these lists

⁶ See G.L. c. 164, § 85B.

throughout the year, but file them only once per year with the Department. We decline to require the submission of these contact lists in the annual Advanced Planning and Training Reports as proposed by the Companies; however we continue to expect that Companies will provide these contact lists upon Department request.

Finally, the Companies recommend that the Department specify that annual meetings with government officials take place between May 15 and August 1 (Initial Joint Comments at 14; Reply Joint Comments at 4). The Department finds no benefit in further restricting the time frame for annual meetings. We decline to adopt the Companies' recommendation and the Final Revised ERP Guidelines require the Companies to complete annual meetings with government officials prior to August 1.

IV. CONCLUSION

Accordingly, the Department adopts the Final Revised Emergency Response Plan Guidelines for Electric Companies appended to this Order (Appendix 1). In accordance with G.L. c. 164, § 85B, 220 C.M.R. § 19.04, and this Order, the Companies are required to file ERPs consistent with the Final Revised ERP Guidelines by May 15 each year for Department review and approval.

V. ORDER

Accordingly, after due consideration, it is

ORDERED: That the Department adopts the Final Revised Emergency Response Plan Guidelines for Electric Companies appended to this Order; and it is

FURTHER ORDERED: That the Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource Energy, and Fitchburg Gas and Electric Light Company d/b/a Unitil file Emergency Response Plans consistent with these Final Revised Emergency Response Plan Guidelines for Electric Companies by May 15 each year for Department review and approval.

By Order of the Department,

/s/

Angela M. O'Connor, Chairman

/s/

Jollette A. Westbrook, Commissioner

/s/

Robert E. Hayden, Commissioner

An appeal as to matters of law from any final decision, order or ruling of the Commission may be taken to the Supreme Judicial Court by an aggrieved party in interest by the filing of a written petition praying that the Order of the Commission be modified or set aside in whole or in part. Such petition for appeal shall be filed with the Secretary of the Commission within twenty days after the date of service of the decision, order or ruling of the Commission, or within such further time as the Commission may allow upon request filed prior to the expiration of the twenty days after the date of service of said decision, order or ruling. Within ten days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court sitting in Suffolk County by filing a copy thereof with the Clerk of said Court. G.L. c. 25, § 5.

**FINAL REVISED EMERGENCY RESPONSE PLAN
GUIDELINES FOR ELECTRIC COMPANIES
(April 28, 2015)**

OUTLINE OF EMERGENCY RESPONSE PLAN GUIDELINES

- I. Purpose
- II. Definitions
- III. Event Classification
- IV. Incident Command System
- V. Key Functions
- VI. Advance Planning and Training
- VII. Reporting Requirements
- VIII. Filing of Emergency Response Plan
- IX. Attachments

I. PURPOSE

The purpose of Emergency Response Plans (“ERPs”) is to ensure that each electric company is adequately and sufficiently prepared to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. 220 C.M.R. § 19.00 et seq. The purpose of these ERP Guidelines is to establish, to the extent reasonable, uniform content and formatting requirements by which each electric company shall structure its ERP, consistent with the requirements of G.L. c. 164, § 85B and 220 C.M.R. § 19.00 et seq.

II. DEFINITIONS

Command Positions means those Key Positions that report to and provide direct support to the Incident Commander, direct and coordinate the Company’s emergency response efforts within a geographic subdivision of the Company’s service territory, and/or oversee operational or functional categories. Titles for Command Positions may include Section Chiefs, Officers, District Commanders, or Branch Directors.

Company means an investor-owned electric distribution company conducting business in the Commonwealth of Massachusetts.

Department means the Department of Public Utilities, Commonwealth of Massachusetts.

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Emergency Event means an event where widespread outages or Service Interruptions have occurred in the service area of a Company due to storms or other causes beyond the control of a Company. An Emergency Event is an event classified as a Type 1, 2, or 3 event in a Company's ERP.

Emergency Operations Center ("EOC") means the physical location at which the coordination of information and resources to support incident management activities takes place.

ICS Organizational Level means the various levels of operation that a Company may use during an Emergency Event, typically including system level, district/regional level, branch level and decentralized/substation level.

Incident Commander ("IC") means the individual appointed by each Company's senior executive management who has overall responsibility for the Company's response in an Emergency Event.

Incident Command System ("ICS") means the coordinated and collaborative incident management construct specifically designed and made a part of the NIMS under the Federal Emergency Management Agency. ICS enables effective, efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure, designed to aid in the management of resources during incidents.

Key Functions means the seven functions enumerated in the ERP Guidelines that each Company must fulfill during an Emergency Event, including service restoration, environmental response, worker health and safety, customer communications, communication with government officials, logistics and field support, and finance and administration.

Key Positions means the positions established and identified by a Company in its ERP that are responsible for overseeing, at each ICS Organizational Level, Key Functions during an Emergency Event.

Life Support Customers ("LSCs"), also known as medical priority customers, means those customers who have provided documentation to the electric Company of their medical conditions necessitating electric service.

Municipal Liaison means a liaison designated by a Company to communicate with a municipality during an Emergency Event.

Mutual Assistance Agreement means an agreement among a Company and other utilities, both inside and outside the Commonwealth of Massachusetts, that details specifics for obtaining or lending resources, including, but not limited to, material, equipment, and trained personnel, when internal resources are not sufficient to ensure the safe and reasonably prompt restoration of service during an Emergency Event.

NIMS means the National Incident Management System under the Federal Emergency Management Agency. NIMS was developed to enable federal, state and local governments to prevent, protect against, respond to, recover from and mitigate the effects of incidents.

Post-Event Stage means the period of time immediately following restoration of service to all customers after an Emergency Event.

Pre-Event Stage means the period of time between when (1) a Company first identifies an impending Emergency Event, and (2) the Emergency Event first causes damage to the Company's system resulting in Service Interruptions.

Priority One Calls mean emergency notifications from municipal officials regarding downed wires and utility poles that are life threatening in nature or pose imminent danger.

Priority Two Calls mean emergency notifications from municipal officials regarding downed wires and utility poles that pose a hindrance to emergency operations.

Priority Three Calls mean emergency notifications from municipal officials regarding downed wires and utility poles that pose a non life threatening emergency hazard.

Service Interruption means the loss of service to one or more customers connected to an electric distribution company's distribution system.

Service Restoration Stage means the period of time between when an Emergency Event first causes damage to the system (resulting in Service Interruptions), and the time when service is restored to all customers.

III. EVENT CLASSIFICATION

Each Company shall classify Emergency Events in its ERP as Type 1 through 5 events corresponding with NIMS classification. Each Company's ERP shall describe the general characteristics and expected impact, based on historical data on the severity of damage experienced by the Company during past events, typically associated with each type of event. Each Company shall include a description of its procedures for transitioning from one event classification type to another, as warranted by escalating or diminishing conditions.

In table format, for each event type, the Company shall include at least the following:

1. a narrative description of Company operating processes, including but not limited to: types of required resources, the Company's pre-staging process, as well as any other pertinent information that explains the Company's event type-specific operating process;
2. typical event characteristics, including but not limited to: the expected percentage of customers without service, the expected number of trouble locations, typical event duration and typical event frequency;
3. typical response organization, including but not limited to: the ICS Organizational Levels activated, the restoration support functions activated, Municipal Liaison activation, whether operations remain centralized or become decentralized, and whether and how many EOCs are open;

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4. typical resource activation, including but not limited to: the expected number and type of resources required to respond, including line crews, tree crews, damage assessors, and wires-down crews, reported in both crews and full-time equivalents, and whether external resources typically are required; and
5. communication and coordination, including but not limited to: identification of reporting requirements, internal communication channels, after action review, and post-event municipal communication.

Where appropriate, the Company may include in its event classification a range of values, rather than a single value.

Table 1.

Type	Typical Operating Conditions	
	Narrative	
	Typical Event Characteristics	
	Typical Response Organization	
	Typical Resource Activation	
	Communication/Coordination	

IV. INCIDENT COMMAND SYSTEM

A. General Requirements

Each Company shall have an emergency response organizational structure based on ICS to prepare for and respond to Emergency Events. Each Company shall identify in its ERP its specific hierarchical structure in accordance with ICS, at each ICS Organizational Level with operations responsibility, from the highest level of operations authority (e.g., system level) to the lowest, most local operations level (e.g., decentralized/substation level).

Each Company shall be responsible for ensuring that (1) the ERP is up to date, (2) all positions are adequately and sufficiently staffed, (3) all assigned personnel are adequately and sufficiently trained, (4) ERP drills and exercises are conducted as scheduled in Section VI(C), and (5) the Company has adequately and sufficiently stocked all materials, vehicles, and communications equipment necessary to support its response effort.

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Each Company shall also describe its process for keeping its senior management apprised of Emergency Events, and the means by which its senior management provides strategic guidance to an Incident Commander.

B. Incident Commander

Each Company shall establish and identify in its ERP the position of Incident Commander, who upon activation of the ERP shall be responsible for the Company's overall response in an Emergency Event including directing and coordinating all aspects of the Company's response efforts.

The ERP shall identify the responsibilities of the Incident Commander which shall include, but not be limited to:

1. determining which components of the ERP shall be initiated during an event, based on the event type;
2. determining the resources required to respond to an event, and directing the efforts to (i) obtain the required resources, and (ii) allocate available resources on a system-wide basis;
3. coordinating the efforts of the Command Positions and Key Positions within a Company's ICS organizational structure;
4. providing restoration response status information, as warranted and appropriate, to senior management;
5. implementing the ERP demobilization process; and
6. implementing the post-event review process.

C. Command Positions and Key Positions

Each Company shall establish and identify Command Positions and Key Positions. Based on each Company's organizational structure and service territory, Command Positions and Key Positions may vary among Companies, and the actual activation of specific Command Positions and Key Positions will depend on the nature of an Emergency Event. Command Positions and Key Positions must be clearly established and presented to the Department, as described below, in order to ensure clarity for employees and enable the overall effective execution of the ERP before, during, and after an Emergency Event.

D. Additional Required Information

The Company's ERP also shall include the following information:

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1. a full position description of the duties and responsibilities assigned to the Incident Commander and each Command Position (see Attachment 1 for format);
2. a checklist of all actions, with associated forms and documents, to be taken by the Incident Commander and each Command Position during the (i) Pre-Event Stage, (ii) Service Restoration Stage, and (iii) Post-Event Stage, for each event type;

The Company may provide in its ERP the above information for Key Positions. If the Company chooses not to do so, the Company must do all of the following: (i) certify to the Department that the Company has the full set of required position descriptions and checklists for all Key Positions; (ii) include in the ERP some representative descriptions and checklists that illustrate the form and elements of all the position descriptions and checklists; (iii) provide an explanation of how the checklist function will occur in an Emergency Event (e.g., distribution of paper or electronic checklists); and (iv) provide all position descriptions and checklists not included in the ERP to the Department as an attachment to the Company's annual ERP filing.

In addition, each Company's ERP shall include one or more organizational chart(s) that identify (1) the Incident Commander, Command Positions and Key Positions at each ICS Organizational Level, and (2) the job title(s) within the Company that upon activation of an ERP would fill each Command Position and Key Position.

V. KEY FUNCTIONS

A. General Requirements

Each Company's ERP shall include a full description of how it will fulfill each of the Key Functions described below. Each Company's ERP shall also establish and describe for each Key Function in detail the responsibilities and procedures by which it will address planning and operations to prepare for and respond to an Emergency Event.

B. Service Restoration

Each Company's ERP shall establish and describe in detail the procedures by which it will address service restoration issues that arise in the course of an Emergency Event, including, but not limited to, procedures for:

1. Event Evaluation
 - a. establishing the level of ERP activation based on the event type;
 - b. determining when centralized versus decentralized control is appropriate; and
 - c. coordinating internal resources.

2. Damage Assessment

- a. describing the methods for making, within 24 hours, broad-scale preliminary assessments of the nature and extent of system damage based on rapid surveys of damaged areas and other data sources, and for making, within 48 hours, more detailed estimates of system damage based on systematic field surveys. The damage assessment time will begin when it is safe for the Company to perform restoration activities;
- b. compiling, analyzing, and evaluating damage assessment and other pertinent and available trouble data; and
- c. communicating with damage survey crews and service restoration crews.

3. Crew Resources

- a. estimating necessary crew, material, and other resource needs;
- b. evaluating and documenting the need for mutual assistance (prior to and during the event);
- c. interpolating the results of damage assessment in order to make reliable projections of the personnel, equipment, materials and time that will be needed to rapidly and safely achieve service restoration goals in all damaged areas;
- d. deploying company, mutual aid, and contractor crews to work assignment areas, monitoring crew activity, reassigning crews as necessary and releasing crews, under both centralized and decentralized command modes; and
- e. identifying management staff responsible for Company operations, including a description of their specific duties; identifying the number of service workers available to respond within 24 hours of an Emergency Event; and, estimating the number of crews and full-time equivalents available to respond within 24 hours of an Emergency Event.

4. Wires-Down Response

- a. responding to priority wires-down calls, levels one through three, including how the Company calculates and disseminates initial and updated (if applicable) estimated times of arrival. The Company must respond to:

- i. Priority One Wires-Down Calls with the nearest trained resource,
 - ii. Priority Two Wires-Down Calls with the next available trained resource, and
 - iii. Priority Three Wires-Down Calls with capable resources
- b. responding to customer-reported (i.e., non-priority) wires-down calls and ensuring that customer-reported wires-down calls do not pose a public safety threat; and
- c. tracking and reporting, at a minimum, the following priority wires-down data: (1) date and time call received; (2) priority level; (3) date and time first Company resource arrived on the scene; (4) time between call received and first Company resource arrived on the scene; and (5) date and time of repair.

5. Restoration Priorities and Coordination

- a. identifying restoration priorities to ensure that restoration time is minimized, including prioritizing service restoration to customers on the “critical facilities” list and Life Support Customers;
- b. coordinating Company restoration procedures with those of other Companies’ restoration efforts and with state and local emergency management and public works and public safety efforts; and
- c. coordinating Company restoration, including wires-down response, with telecommunications companies with facilities in the Company’s service area.

C. Environmental Response

Each Company’s ERP shall describe in detail the procedures by which it responds to environmental incidents that arise in the course of an Emergency Event, including, but not limited to, procedures for:

1. assessing incidents to determine the appropriate level of response;
2. identifying hazardous conditions;
3. evaluating needs and securing spill response resources;
4. establishing and maintaining communication with spill response personnel; and
5. reporting conditions to the Incident Commander.

D. Worker Health and Safety

Each Company's ERP shall describe in detail the procedures by which it ensures the health and safety of workers in the restoration effort during an Emergency Event, including but not limited to procedures for:

1. identifying hazardous situations associated with an event;
2. ensuring the safety of its employees and contractors;
3. exercising emergency authority to stop and prevent unsafe acts or correct unsafe conditions;
4. providing human resource support to impacted employees and their families;
5. reporting conditions to the Incident Commander; and
6. notifying senior management of any significant employee/labor issues.

E. Customer Communications

Each Company's ERP shall establish and describe in detail the procedures by which it will communicate with customers during an Emergency Event, including, but not limited to, procedures for:

1. ensuring that the Company responds to customer calls in a timely manner, including ensuring sufficient staffing levels to handle the extraordinary volume of customer calls that are normally received during Emergency Events. This must include, at a minimum, a continuously staffed call center in the Commonwealth of Massachusetts¹ that is sufficiently staffed to handle all customer calls for service assistance for the duration of an Emergency Event or until full service is restored, whichever occurs last;
2. a communications process with customers that provides continuous access to staff assistance. The Company shall provide estimated times of restoration ("ETRs") on a website. Such information shall be prominently displayed and updated at least three times a day. The Company shall also provide ETRs at least three times a day through at least one other form of media outreach, and when requested by customers via telephone. Updates shall begin upon completion of damage assessment or after the first 24 hours following the beginning of damage assessment, whichever comes first;

¹ A Company with a call center located within 50 miles of its service area, in operation as of January 1, 2012, shall not be required to designate an additional call center as long as the call center continues in operation. If the call center is unable to operate during an Emergency Event, the Company shall use a call center located within 50 miles of the Commonwealth of Massachusetts.

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3. developing Public Service Announcements to ensure unity of message regarding status of Service Interruptions, projections for service restoration, and other pertinent information;
4. developing and disseminating, in a timely manner, initial and updated ETRs, including global (i.e., system-wide), district or branch, and town-level ETRs;
5. contacting Life Support Customers; and
6. referring Life Support Customers, and individuals with special needs, to contact public safety officials.

F. Communications with Government Officials

Each Company's ERP shall establish and describe in detail the procedures by which it will communicate with Department staff, Massachusetts Emergency Management Agency ("MEMA") personnel, state and local public safety officials, and/or their designees, during an Emergency Event, including, but not limited to, procedures for:

1. providing advance notice to the officials described above, establishing a dedicated line of communication and providing restoration effort information during an Emergency Event, as discussed in Section VII, below;
2. designating staff to be posted at the MEMA operations center for the length of an Emergency Event;
3. receiving and processing calls from Department staff, MEMA personnel, public safety officials, and/or their designees and providing frequent and timely feedback;
4. meeting regularly with Department staff, MEMA personnel, public safety officials, and/or their designees to discuss emergency response, as discussed in Section VI.B below;
5. implementing a Municipal Liaison process, including a complete description of the Company's Municipal Liaison process that shall include the designation of an employee or employees to serve as Municipal Liaisons for each municipality within its service territory;
6. providing each Municipal Liaison with the necessary feeder map(s) outlining municipal substations and distribution networks and up-to-date customer outage reports at the time of the designation as Municipal Liaison;
7. ensuring unity of message; and
8. conducting post-event follow up with impacted municipalities.

G. Logistics and Field Support

Each Company's ERP shall establish and describe in detail the procedures by which it will provide logistical and field support during an Emergency Event, including, but not limited to, procedures for:

1. securing external resource requirements (e.g., line crews, crew guides, wires-down standby personnel, damage assessors, and tree crews), including resources acquired through Mutual Assistance Agreements;
2. maintaining on-hand inventory;
3. procuring and distributing materials and supplies;
4. managing vehicle assignments;
5. administering and mobilizing vendor contacts;
6. overseeing the mobilization, operation and demobilization of staging areas; and
7. securing lodging, meals, and other alternate housing arrangements.

H. Finance and Administration

Each Company's ERP shall establish and describe in detail its financial and administrative procedures during an Emergency Event, including, but not limited to, procedures for:

1. processing financial, compensation, and claims-related matters; and
2. providing facility support and ensuring critical infrastructure remains operational.

VI. ADVANCE PLANNING AND TRAINING

A. General Requirements

Each Company's ERP shall include a detailed description of the actions it will take to ensure that it adequately and sufficiently prepares to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. These actions shall include, but not be limited to, (1) meetings with Department staff, MEMA personnel, public safety officials, and/or their designees, (2) conducting training and drill exercises, and (3) maintaining updated lists of personnel and entities that may assist in the Company's restoration efforts.

B. Meetings with Government Officials

Each Company shall hold one or more meetings, at least annually, with:

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1. appropriate local elected and appointed officials of each of the cities and towns in which it provides service to ensure the effective and efficient flow of information between the Company and local elected and appointed officials during an Emergency Event;
2. state and local public safety officials of each of the cities and towns in which it provides service to ensure the effective and efficient coordination between the Company and local public safety officials during an Emergency Event, including Company policies and procedures that will identify service locations of its LSCs and refer all requests by LSCs and other special needs customers to public safety officials for response; and
3. tree wardens or appropriate official of each of the cities and towns in which it provides service, to ensure the effective and efficient coordination between the Company and city or town regarding (i) the Company's annual vegetation management practices, and (ii) the Company's response during an Emergency Event.

Each Company shall complete its meetings with government officials prior to August 1 of each year. Each Company shall provide sufficient advance notice to invitees of each of the meetings identified above to allow appropriate attendance and participation. Each Company shall provide, sufficiently in advance of each of the meetings identified above, an agenda and pertinent presentation materials to invitees of such meeting. A Company may schedule joint meetings with invitees.

C. Training Sessions and Drills/Exercises

Each Company shall use training sessions and drills/exercises to prepare for an Emergency Event, and to test the adequacy and effectiveness of its personnel performing job functions outside of their normal areas of responsibility in implementing the Company's ERP during an Emergency Event. Each Company shall conduct drills that correspond to each specified event type.

Each Company shall conduct:

1. training sessions, at least annually, for all employees to whom the Company has assigned responsibilities during an Emergency Event. The purpose of these training sessions is to ensure that these employees can effectively and efficiently perform their assigned responsibilities during such an event; and
2. drills/exercises, at least annually, for all employees to whom the Company has assigned responsibilities during an Emergency Event. The purpose of these drills/exercises is to test the Company's ability to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. Each Company shall provide sufficient advance notice to (i) local elected and appointed officials, (ii) state and local public safety officials, and (iii) the Department, to allow appropriate participation in the drills/exercises. Each Company shall include in its drills/exercises (i) simulations of all event

response assignments, and (ii) communication with outside agencies, local governments and others who would normally be included in service restoration responses. The Company shall include, as part of its drill/exercise activities, table-top exercises that address how the Company would respond to an Emergency Event that occurred coincidentally with (i) loss of business continuity, (ii) a national emergency, or (iii) a pandemic incident.

Each Company shall complete its training and drills/exercises prior to August 1 of each year. Each Company shall provide additional detailed training sessions, prior to November 1 of each year, to new Company staff or other staff who have been given new event response assignments.

D. Contact Information

Each Company shall maintain updated lists of contact persons for Emergency Events, with titles, addresses, phone numbers and other pertinent data as appropriate, for the following:

1. all utility personnel assigned event response positions;
2. mutual aid companies and contractors;
3. LSCs of record;
4. facilities on the Company's "critical facilities" list, including area hospitals and other state or municipal Level 1 critical care facilities;
5. print and broadcast media;
6. operators/managers of retained motels, restaurants and dormitories, etc.;
7. state, county and local elected officials, the Department of Energy Resources ("DOER"), law enforcement officials, and emergency management and response personnel within a Company's service territory; and
8. vendors.

Regarding LSCs, maintaining an updated list of these customers means that each Company shall (1) immediately add customers to the LSC list upon notification from customers of their medical need for electric service, and (2) verify the contact information of those customers on the LSC list at least annually.

VII. REPORTING REQUIREMENTS

A. Advance Planning and Training Reports

As required by 220 C.M.R. § 19.03(4)(a), each Company shall submit a detailed report with supporting documentation to the Department for each meeting, training, and drill/exercise held pursuant to 220 C.M.R. § 19.03(2)(a)2.

1. Meetings with Government Officials

For each meeting identified in Section VI.B, above, each Company shall file with the Department a report that includes, but is not limited to, the following information: (1) invitees, and their job titles; (2) attendees and their job titles; (3) the agenda; (4) all presentation materials; (5) minutes; (6) action items that result from the meeting; and (7) status of each identified action item. Each Company shall file this report by September 1 each year.

2. Training Sessions and Drills/Exercises

For each of the training session and drills/exercises identified in Section VI.C above, each Company shall file with the Department a report that includes, but is not limited to, the following information: (1) the date of the training or drill/exercise; (2) participants, their job titles, and their responsibilities during Emergency Events; (3) a full description of the type of event that is the subject of the training or drill/exercise; (4) a detailed evaluation of the performance of the Company in the training or drill/exercise, including lessons learned and action items that result from the training or drill/exercise; and (5) status of each identified action item. Each Company shall complete its training and drills/exercises by August 1 and file this report by September 1 each year.

3. Contact Information

Each Company shall file with the Department certification that it has updated all contact lists identified in Section VI.D. Contacts lists shall include, but not be limited to, the following information: contact persons; titles; addresses; phone numbers; and other pertinent data. Each Company shall file this certification by September 1 each year and make the full lists available to the Department upon request.

B. Outage and Service Interruption Reports

1. Outage and Accident Reporting Procedures

Each Company shall continue to report every sustained distribution and transmission interruption that occurs within or impacts its service territory as required by the Department's Outage and Accident Reporting Procedures set forth in Service Quality Guidelines, D.P.U. 04-116-C (2007) (Service Quality Guidelines, Section VIII.H). The content and format of these reports is shown in Attachment 2 to these ERP Guidelines. In addition, each Company shall file annually with its ERP a compact disc that contains a compilation of the previous year's reports, in a working Excel spreadsheet format.

2. Emergency Event Reporting

a. General Requirements

As required by 220 C.M.R. § 19.03(4)(b), each Company shall provide periodic reports to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, that contain detailed information related to emergency conditions and restoration performance for each affected city and town. Different event types may trigger different levels

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of reporting detail; the ERP shall clearly describe the level of reporting for each event type. The ERP shall include at a minimum the reporting requirements in subsections b, c, and d, below.

b. Pre-Event Stage Reports

During the Pre-Event Stage, each Company shall provide the following information to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, and DOER (1) twice daily at 5 a.m. and 5 p.m., or more frequently upon Department request, and (2) when the Company changes the event type:

1. Weather forecasting and monitoring;
2. Planned storm conference calls (indicate date and time);
3. Pre-event communications with the public, municipal contacts, and elected officials (describe communication methods);
4. Pre-event notifications with regulators, MEMA and LSCs (describe communication methods);
5. Expected Event Classification type (describe expected severity), including all factors considered in that determination. In addition, if applicable, describe any changes to event classification type and the factors considered in the determination;
6. Resource readiness (indicate actions taken to ensure availability of crews and material resources indicating type and quantity of available crews);
7. Likelihood of EOC being opened (indicate date and time predicted to be opened or opened);
8. Problems anticipated or encountered in preparation for the anticipated Emergency Event; and,
9. Any other pertinent information.

In addition to the above listed information, each Pre-Event Stage report shall include a table with the following information: (1) date and time of report; (2) event type; (3) expected percentage of customer outages; (4) expected number of trouble spots; (5) expected number and type of resources required (including the number of crews and full-time equivalents); (6) number of internal resources secured (by type and including the number of crews and full-time equivalents); (7) number of external resources secured (by type and including the number of crews and full-time equivalents); and, (8) expected duration of restoration.

c. Service Restoration Stage Reports

During the Service Restoration Stage, each Company shall provide periodic reports to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, and DOER that contain detailed information related to emergency conditions and

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restoration performance for each affected city and town. The content and format of the information to be included in these reports, as well as the required frequency of the reports, are shown in Attachment 3 to the ERP Guidelines.

In addition, no later than seven days after the end of an Emergency Event, each Company shall provide a report to the Department that includes all necessary updates and corrections to its Service Restoration Stage reports.

d. Final Event Report

As required by 220 C.M.R. §19.03(4)(c), each Company shall submit a detailed report with supporting documentation to the Department on its restoration performance during a Type 1 or Type 2 event including lessons learned, no later than 30 days following such an event. The content and format of information to be included in this report is shown in Attachments 4 and 5 to the ERP Guidelines. Upon Department request, a Company shall submit a report for a Type 3 event.

VIII. FILING OF EMERGENCY RESPONSE PLAN

Each Company shall file an ERP, which the Company has reviewed and updated within the previous twelve months, with the Department on or before May 15 each year, for review and approval. The filing shall include a copy of all written Mutual Assistance Agreements into which the Company has entered, and identify and describe any modifications to the ERP and Mutual Assistance Agreements since the previous ERP filed with the Department. 220 C.M.R. § 19.04(3). In addition, each Company shall file a copy of its ERP and any updates with the emergency management director of each municipality within its service territory.

IX. ATTACHMENTS

Attachment 1: Duties and Responsibilities of Key Positions

Attachment 2: Outage and Accident Reporting Procedures Requirements

Attachment 3: Service Restoration Stage Reports

Attachment 4: Final Event Report Tables

Attachment 5: Final Event Report

Attachment 1

Duties and Responsibilities of Key Positions

A. Position Title:

B. Reports to:

C. Position Duties and Responsibilities:

D. Pre-Emergency Preparations:

E. Duties, Responsibilities, and Actions during an Emergency Event:

F. Post-Emergency Event Responsibilities and Reports:

G. Equipment Required:

H. Position work location:

I. Work period:

J. Activation notification:

And some positions also contain:

K. Major Event Activation:

L. Additional Responsibilities during Major Events:

M. Additional Equipment Requirements and

N. Additional Staff Requirements:

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Attachment 2 – Outage and Accident Reporting Procedures Requirements

Table 2

Each Company shall provide the information listed in Table A to the Department consistent with the Outage Reporting Protocol set forth in the Department's Service Quality Guidelines in D.P.U. 04-116-C.

1	2	3	4	5	6	7	8	9	10
Incident ID	Date Filed	Company Name	District/Division Name	location of interruption (City/Town where fault occurred)	Street Name	Substation Name and ID	Circuit Number ID	Circuit Branch ID	Voltage Level to the nearest (Transmission, 35kV, 25kV, 5kV, Secondary)
11	12	13	14	15	16	17	18	19	20
Circuit Type (OH/UG/ Customer Owned)	Original Number of Customers Affected	Current Number of Customers Affected (Show zero if restoration is completed)	Actual duration (in hours)	Total Customer Interruption Hours	Date and Time out	Date and Time in	Nature/cause of interruption	Failed or damaged device/ equipment	Indicate if the interruption was planned/unplanned/ intentional
21	22	23	24	25	26	27	28	29	30
Weather Condition	Primarily affected Load Type (Residential/ Industrial/ Commercial/ Mix)	Whether the Interruption Affected a Critical Facility/Customer	Whether the Interruption is Major Excludable Event	Whether an Injury Occurred as Result of the Event	Name of the Person Responsible for filing the report	Time Restoration Commenced	Expected duration	Town/City Official Notification (Yes/no)	Name of Notified/ Contacted Person
31	32	33	34	35	36	37			
Telephone Number of Notified/ Contacted Person	Official Notified Name (1)	Official Notified Phone (1)	Official Notified Name (2)	Official Notified Phone (2)	Report Type	Comment			

Attachment 3 – Service Restoration Stage Reporting Requirements

Table 3-A

Restoration Stage. The Company shall update this information every four hours: 00:00, 04:00, 08:00, 12:00, 16:00, 20:00

1	2	3	4	5	6	7	8	9
Company Name	Year	Month and Date	Hour	Weather Forecast	ERP Implementation (Date & Time)	Event Level/ Classification	EOC Status (Activation Date & Time)	Identify Problems Encountered
10	11	12	13	14	15	16	17	18
District Name	Town Name	Total # of Customers Served in Town	Total # of Customers Without Power in Town	Percent of Customers Without Power in Town	Estimated Restoration Time (ERT)	Number of Trouble Locations in Town	Number of Services to be Repaired in Town	Comments

Attachment 3 – Service Restoration Stage Reporting Requirements

Table 3-B

Restoration Stage. The Company shall update this information every eight hours: 00:00, 08:00, 16:00.

1	2	3	4	5	6	7	8	9
Company Name	Year	Month and Date	Hour	LSC Notifications	Municipal Notification	MEMA Notification	Regulatory Notifications	District Name
10	11	12	13	14	15	16	17	18
Town Name	Number of Company Line Crews	Number of Contractor Line crews	Number of In-State Mutual Aid Line Crews	Number of Out-of-state Mutual Aid Line Crews	Number of Company Tree Crews	Number of Contractor Tree Crews	Number of In-State Mutual Aid Tree Crews	Number of Out-of-state Mutual Aid Tree Crews
19	20	21	22	23	24	25	26	27
Number Company Wire Down Crews	Number Contractor Wire Down Crews	Number of In-State Mutual Aid Wire Down Crews	Number of Out-of-State Mutual Aid Wire Down Crews	Number of Company Damage Appraiser Crews	Number of Contractor Damage Appraiser Crews	Number of In-State Mutual Aid Damage Appraisers	Number of Out-of-State Mutual Aid Damage Appraiser Crews	Number of Company Substation/ Transmission Crews
28	29	30	31	32	33	34	35	
Number of Contractor Substation/ Transmission Crews	In-State Mutual Aid Substation/ Transmission Crews	Out-of-State Mutual Aid Substation/ Transmission Crews	Total # of Crews Working	Number of Company Support Personnel Used	Number of Non-Company Support Personnel Used	List Source of Mutual Aid	Comments	

Attachment 4 – Final Event Reporting Requirements

Event Restoration Duration Summary Table 4-A

1	2	3	4	5	6	7	8	9
Company Name	Year	Event Name (if any)	Date/Time Event Start	Date/Time Event End	Event Duration (in Hours)	Total Customers Served	Total Customers Affected	% of Customers Affected (Relative to Total Customers)

10	11	12	13	14	15	16	17	18
Highest Peak # of Customers Affected	Date and Time when Highest Peak # of Customers Affected Occurred	Total Customer Outage Hours	Duration from Highest Peak to 95% Restored (in Hours)	CAIDI Highest Peak to 95% restored (in Hours)	Duration from Highest Peak to 98% restored (in Hours)	CAIDI Highest Peak to 98% restored (in Hours)	Event CAIDI (in Hours)	

Priority Wires Down Summary Table 4-B

1	2	3	4	5	6	7	8	9
Company Name	Event Name (if any)	Location (City/Town Name)	Priority Level (1, 2, or 3)	Date and Time Call Received	Date and time first Company Resource Arrives on the Scene	Time Between Call Received and First Company Resource Arrived on the Scene (in Hours)	Date and Time of Repair	

Attachment 5 – Final Event Reporting Requirements Table 5
Final Event Report

1 Narrative Description

Provide a narrative describing the Emergency Event, including, but not limited to weather monitoring, weather experienced, event classification, crew acquisition (by type), customer outages, damage experienced, beginning time and completion of preliminary damage assessment and detailed damage assessment, and timing of restoration.

2. Event Description

Total number of customers served

Total number of communities served

Date and time storm hit service territory

Date and time of first outage

Date and time Governor declared state of emergency

Total number of customer outages over the course of the event

Total number of communities affected

Total number of days of restoration

Date and time of peak number of outages

Number of customer outages and number of customers restored for each day of the event and restoration

Number of total customer outages and number of total customers restored per hour of the event and restoration, in an active Excel spreadsheet

Time and date of restoration of 95 percent of customers

Time and date of final restoration to customers

A single consolidated report based on the Service Restoration Stage reports. Data should include all necessary updates and corrections to its Service Restoration Stage reports and be submitted in an active Excel spreadsheet. See Attachment 4, Table 4-a, for content and format;

A summary of all available resources (in crews and full-time equivalents), by day and resource type.

3. Weather

Actual weather experienced

A narrative description of the Company's evaluation of weather forecasts before and during the event and copies of all supporting weather reports

Maximum winds experienced

Duration of inclement weather

Type and amount of precipitation, including, but not limited to average amount of precipitation in service territory, and maximum amount of precipitation in service territory

4. Event Classification

List and discuss all factors used to derive event classification types before, during, and after the storm

Describe any event classification type changes before, during, and after the storm, and explain all factors supporting the change in classification

5. Equipment Damage

Number of transmission lines affected

List of transmission lines that became inoperative

List of substations affected

Number of distribution feeders affected

Number of distribution feeders locked out

Number of broken poles replaced – indicate location, size, and age of damaged poles

Number of feet of primary and secondary conductor replaced – indicate type and size

Number of feet of follow-up reconductoring remaining – indicate type and size

Number of damaged transformers – indicate size, type, and age of damaged transformers

Availability of replacement transformers

Repairs made

Estimate for repairs

Switching necessary to re-route power with adequate sectionalizing points

6. Trouble Order System

Number of trouble orders

Identify and describe any problems encountered on the Company's system

Was there sufficient manpower available to operate the system

If de-centralization occurred, identify and describe any problems encountered after decentralization

7. Wires-Down Operations

Total number of Priority wires-down calls by priority level

For each day of the event and restoration period include; outstanding priority wires-down calls by priority level, completed priority wires-down calls by priority level – provide in an active Excel spreadsheet

A summary of priority wires-down response – provide in an active Excel spreadsheet, see Table 4-B for content and format

Number of non-priority wires-down calls

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8. Crew Supplements

For all crew counts, please include both the number of crews and full-time equivalents

Total number of Company crews

Number and type of crews from outside the Company

Total number of wires-down appraisers

Total number of damage appraisers

For each day of the Pre-event and Service Restoration Stage, total number of crews per day, by type (e.g., line crew, tree crew, wires-down crew, transmission crew, damage assessor)

For each day of the Pre-event and Service Restoration Stage, number of crews deployed, by type, to each district

For each day of the Pre-event and Service Restoration period, number of wires-down appraisers and damage appraisers used

9. Food and Lodging

Summary of food and lodging related activities, including lessons learned

10. Helicopter

Were helicopters available

How were the helicopters used

11. Communication

Narrative description of Pre-event Stage, Service Restoration Stage, and Post-event Stage communication with public officials

Narrative description of Pre-event Stage, Service Restoration Stage, and Post-event Stage communication with the public

Narrative description of Pre-event Stage, Service Restoration Stage, and Post-event Stage communication with LSCs

Narrative description of Pre-event Stage, Service Restoration Stage, and Post-event Stage internal communication

Identify all methods used for communication with the public, including a narrative description, the dates and frequency or use

Narrative description of Municipal Liaison process during Pre-event Stage, Service Restoration Stage and Post-event Stage

Number and locations of Municipal Liaisons