Mark S. Lynch
President

April 1, 2013

VIA ELECTRONIC FILING

Honorable Jeffrey C. Cohen
Acting Secretary of the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Cases 09-E-0715, 09-G-0716, 09-E-0717 and 09-G-0718 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation for Electric and Gas Service

Dear Acting Secretary Cohen:

By this letter, New York State Electric & Gas Corporation ("NYSEG") and Rochester Gas and Electric Corporation ("RG&E") (together, "the Companies") are submitting the NYSEG/RG&E *2013 Electric Utility Emergency Plan* ("*Plan*"). The *Plan* is being submitted, as required, as our annual update. As in past years, the *Plan* describes the procedures for both NYSEG and RG&E.

Introduction

As the result of the lessons learned by the Companies in connection with Hurricane Sandy and other recent storms, including Hurricane Irene and Tropical Storm Lee in 2011, the Companies have substantially revised the *Plan* in order to strengthen the effectiveness of our emergency preparation and response. As described more fully below, and as set forth in the *Plan* itself, significant revisions include:

- Balancing the description of the role and expectations of the Incident Command System (ICS) with an equal focus on the Area Command Planning Section (ACPS), the latter of which is activated in larger, more complex events like Hurricane Sandy. *See Plan* Section 4.

- Addressing the use of non-traditional resources such as local and regional resources and the National Guard. *See Plan* Section 5.
- Holistically consolidating the steps the Companies' have taken to ensure readiness in the event of an emergency and prepare for individual events. The *Plan* addresses non-emergency outreach to customers (including critical customers and those requiring life support equipment) and public officials, steps to ensure that the Companies have adequate supplies of equipment necessary to facilitate restoration following a storm, training and drills (including plans to train all Company employees to serve in an ICS role), and system hardening and vegetation management initiatives designed to limit the impact of future events. The *Plan* also shows how preparation for individual events unfolds, as the alert status changes and the Companies gear up for a storm. *See Plan* Sections 6 and 7.
- Revisions to the description of restoration priorities that, among other things, clarify the fact that, during an emergency, restoration priorities may change depending on the circumstances of the event and the needs of our customers and public officials. *See Plan* Section 8.
- Guidelines for communicating with public and municipal officials during and after emergency events, including delineating the role of Company personnel staffing the municipal emergency operations centers. *See Plan* Section 9.7.
- The inclusion of guidelines on the Companies' expanding use of social media to communicate with customers during an emergency event. *See Plan* Section 9.2.

Additionally, we have taken steps to improve the flow and organization of the plan, and have removed duplicative and obsolete information, to make it easier to find and use the guidance it contains. These and other modifications recommended by the PSC reflect the Companies' recognition that effective and efficient emergency preparation and response is vital to the well-being of our customers and to the success of the Companies. This is a core electric operations competency, and nothing is more important during these events than the safe and prompt assessment and restoration of power. The series of severe and widespread storms during 2011 and 2012, culminating with Hurricane Sandy, have only reinforced our commitment.

Consistent with the Companies' internal commitment to deepen our emergency response bench, position descriptions and procedures have been moved to an ICS Position Guide (IPG) and Emergency Operating Procedures (EOPs) where they will continue to be developed, clarified, refined, standardized, reviewed, and approved during 2013.

Addressing PSC Recommendations

As described more fully below, the amendments to the *Plan* have been guided by, among other things, a February 14, 2013 letter from Mike Worden, the Commission's Chief of Electric Distribution Systems, to the Companies that identified five areas in which the Plan should be improved: (1) addressing procedures to restore customer's power after flooding; (2) describing procedures where the Companies preemptively shut down power to protect the electric system; (3) ensuring adequate use of social media, e-mail, and texting in communication with customers; (4) completion, implementation, and integration of all Staff recommendations with regards to Hurricane Irene, Tropical Storm Lee, and 2011 October Snow Storms; and (5) implementation of the Companies' recommendations post Hurricane Sandy. The *Plan* addresses these issues as follows:

1. Post-Flooding Restoration:

Procedures to restore customer's power after flooding are addressed in Section 7 of the Plan and the EOPs, as well as in Attachment 1 hereto.

2. Preemptive Shut Down:

Procedures to preemptively shut down the electric system are addressed in Section 8 of the Plan and the EOPs, as well as Attachment 2 hereto.

3. Social Media:

The use of social media, including detailed descriptions of the use of Twitter, e-mail, and texting is addressed primarily in Section 9 of the *Plan*.

4. Implementation of Staff Recommendations Following Hurricane Irene:

The table in Attachment 3 provides the status of each of the following Staff recommendation:

- Review report re: fatality investigation August 28, 2011 at Orange & Rockland: Both the handling of wires down and the updating of the Outage Management System (OMS) are well and frequently coordinated. Wire downs are classified and tracked as electric trouble within OMS, and the Wires Down Branch Coordinator has this information as well as information from other sources to coordinate and manage wires down response. NYSEG and RG&E both deploy warning materials at the scene (e.g., tape, cones, etc.) to inform and warn all passerby's not just local residents. In addition, local press releases are sent out to the media with several safety tips, including warning the public of the danger of downed power lines and to encourage the public to report any that are found. Our

procedures also require that once a wire guard arrives on the scene an individual remains present until the situation is made safe. The *Plan* addresses the classification, prioritization, and management of wires down.

- Develop procedures relating to the use of contracted damage assessors, including training requirements: The Companies have established arrangements for contracted damage assessors and wire guards.
- Better define minimum staffing requirements for the number of wire guards and identify alternate staffing levels when conditions, such as a hurricane, will likely cause an increase in the number of wires down: Each Division will maintain individuals trained in the wire guard role. Wire guard staffing for an event is dependent upon a variety of factors. Factors that influence staffing levels includes: type of damage, percentage of circuits locked out at the substation, size of the area affected, type of distribution system (radial or loop), population density, etc. For Class I storms many of the wires down reports will be assigned to responding line crews and/or supervisors. Wire guards will be used as needed. In Class II events, wire guards will typically be activated as part of the Incident Command Operations Section. Local resources are typically sufficient to handle wire guard needs during Class II events. For Class III events it is anticipated that the Wires Down Branch Director (WDBD) will be activated as part of the Operations section and will manage wire guard assignments. Also, for Class III events it is anticipated that wire guards from other divisions and/or external sources may be needed. If additional wire guards are required the Area Command Planning Section can mobilize additional wire guards from other areas or from contractor resources. The Companies have reached agreement with contractors to mobilize additional trained wire guards if needed.
- Identify means to obtain supplemental wire guards through contractors during or prior to an emergency when employees are not available to serve as guards because they are needed for alternate function: The Companies have established arrangements for contracted damage assessors and wire guards
- Train more wire guards in Brewster, Lancaster, Liberty, and Oneonta divisions: all training of company personnel has been completed. Future training will be conducted, as needed, to train both new employees and those moving into positions used to support the wire guard process.
- Define procedures for obtaining crews from distant states. Emergency plans should include contact information for utilities, contractors, and mutual assistance groups and acknowledge travel and rest time restrictions before the crews can be deployed into the field: The Companies are members of both the New York Mutual Aid Group (NYMAG) and the Edison Electric Institute (EEI). The companies work through the NYMAG and other regional mutual aid organizations when acquiring and coordinating the release of

mutual aid. The Companies also contact contractor agencies for assistance as needed; these resource movements are also managed in collaboration with the regional mutual aid organizations. Contact information is maintained, and travel and rest time restrictions are acknowledged.

- Review facilities susceptible to outside factors (flooding, excessive tree damage, or limited access) to determine whether infrastructure improvement or increased maintenance could be made to reduce customer impact or facilitate ability to restore service: In areas affected by the 2006 flood the Companies reviewed facilities that were susceptible. Where applicable action was taken to reduce vulnerability to infrastructure during future events (e.g., switch heights raised, accessibility improved for mobile substation placement, etc.). The benefits of these system enhancements were realized during the 2011 flooding events. Additional review of facilities for susceptibility to outside factors is a long term initiative and must be considered in parallel with reliability issues, safety, and other factors. This factor has been added to our facility evaluation criteria and will be considered as future construction projects are approved.
- Formalize agreements with property owners to temporarily stage crews, materials, and equipment during restoration at strategic locations: The Companies have determined that formalized agreements for specific staging locations do not best support our restoration efforts. Lack of staging sites within our service territory has never been identified as an issue, even during the largest restoration efforts. Given the size of the NYSEG and RG&E service territories it is unlikely that pre-arranged staging sites will be at the most optimum locations to support actual events. The Companies' will reconsider this recommendation if ever staging areas appear to be constrained. For now however, even in our most densely populated areas, lack of staging locations is not a concern.
- Provide a local presence in severely impacted areas and identify alternative means to improve communications with county offices: The number of Company personnel identified for dispatch to local county offices has been significantly increased, with more than 50 individuals identified to serve in the role of liaisons at the county and local level. All requests for a company representative in county emergency management offices and at the State bunker have been accommodated to date.
- Develop procedure and verification processes to ensure local and regional ETRs will be issued in a timelier manner: Through collaborative efforts with PSC Staff and the other New York utilities the Companies are participating in an automated process that provides outage information to PSC Staff every fifteen minutes on an ongoing basis. Communications between the field crews and outage management personnel has been refined to insure that the most timely estimates and restoration data is taken into account when establishing and managing ETR data. Refinements to the ETR management

process have been made to ensure that this information is available as ETRs are established and that they tie to the automated report being submitted to PSC Staff.

- Establish optimal crew deployment to achieve restoration for the largest number of customers in the least amount of time: Crew deployments are based upon the type of event, type of damage sustained, and the extent of resulting damage. As described in the *Plan*, restoration priorities allow for restoration to the greatest number of customers in the least amount of time.
- Define repair priorities of energized wires down during storm and post storm, considering potential for public harm (population density, level of pedestrian access, and proximity of facilities such as schools) and the safety of utility employees: The *Plan* accounts for making safe as the highest priority during storm events.
- Provide ETRs different from global projection for regional sections of service territory (may be smaller than divisions). Continue to refine ETRs until all localities have their own ETRs: The Companies have procedures in place for managing ETRs and for ensuring that accurate estimates are provided at the global, regional, and local levels. The Incident Command structure has been refined to ensure that accurate field assessment and restoration status is communicated and included in the process for establishing ETRs and the global, regional, and local levels.
- Enhance ETR presentation on website maps: The NYSEG and RG&E websites were enhanced in late 2011 to communicate customer outage, ETR, current weather, and other status information. Display capability is provided that allows the customer to drill down to ETR information for individual outages.
- Investigate ways to continue to expand use of newer technologies to communicate with customers during outages (i.e., email, text messaging, and social media) and report their findings to Staff: The Companies have increased social media monitoring, and increased the use of Twitter during and between storms to build a network of "followers" for further reach of messaging. A contract is in place to complete high volume dialing as needed to support outage events. Our web application, "Outage Central", can be accessed via computer, tablet, or touch screen mobile phone. Users of these technologies can enter outage notifications and receive information on estimated restoration times as well as view other information such as news releases, dry ice and bottled water locations, shelter locations for people and pets, etc. as well as generator and storm safety information. On a daily basis, quick links to outage reporting and information are provided on the home page, and during major outages, a special "storm page" is loaded as the home page for the NYSEG and RG&E websites. We are continuing to explore and expand our social media presence.

- Develop procedures to contact LSE customers before storms: NYSEG has an established procedure to conduct pre-storm call blasts to warn customers of impending weather events. At the guidance of Area Command, communications are initiated by Customer Service with Operations and other areas of the business to gauge the degree of pre-storm preparations and predictions of areas that will be most impacted. Conservative estimates are made regarding divisions to be impacted and queries are run to identify LSE customers in these areas. The vendor who will implement the weather blaster calls is provided a file of LSE customers to initiate outbound campaign.
- Work with referral entities to strengthen follow-up processes and to ensure that feedback regarding LSE customers referred for contact assistance are obtained and recorded: The Companies completes follow-up field visits for customers who we have not been able to reach using internal resources. We have tried not to rely on police/fire as their staff is typically stressed as well during major events. By planning ahead, we ensure we have staff available to assist with this task. In the event that the Companies do engage outside agencies in the future, follow-up with those agencies to ensure contact will become part of the process.
- Review procurement procedures and identify additional contractors who can provide dry ice during storms impacting the East: The Companies have identified additional dry ice suppliers who can be contacted to meet our supply needs. A tool is available to our dry ice unit that lists suppliers by area code for use in future events.
- Develop process to use municipal field liaisons or a similar process to facilitate the removal of hazardous conditions: The Companies' representatives in the county Emergency Operations Centers have the responsibility to coordinate requests from local government for line crew and/or clearing resources with the appropriate operating division. Additional personnel have been identified to support this function.
- Extend invitations to local and state elected officials representing districts to be included on municipal calls: The Companies hold regularly scheduled municipal calls during events to which local and state elected officials are invited to participate. The purpose of this call is to inform officials regarding restoration status and to convey key information.
- Define guidelines for writing self-assessment reports that contain all appropriate information and provide a comprehensive discussion of key decisions and actions taken: In collaboration with DPS Staff and the other New York utilities, the guideline for writing self-assessment reports has been revised. The Companies used this revised approach in our assessments for the July 26, 2012 tornado event and for Hurricane Sandy.
- Develop better reporting protocols to ensure the Department is kept informed (re: Gas): The Companies' Gas Operations has procedures in place to comply with all notification and reporting requirements as identified by state regulations (e.g., 16NYCRR Part 255).

5. Self-Assessment Improvements Following Hurricane Sandy:

The Companies included a self-assessment section in our January 2, 2013 *Part 105 Hurricane Sandy Storm Report*. Many aspects of preparation, restoration, and communication went well, as we capitalized on the lessons learned from Hurricane Irene and other previous storms and major events, making possible the extraordinary restoration effort executed in the aftermath of Hurricane Sandy.

A number of areas for improvement were also identified . In line with our constant efforts to improve our performance, commitments were made both internally and externally to pursue these improvements. Roughly speaking, those activities can be classified in four categories, each of which has been assigned owners to improve performance and encourage best practices:

- Enhance customer experience with external stakeholders: We are working closely with local and regional public officials (such as in Brewster, Dutchess, and Putnam Counties, where emergency events in recent years have been especially devastating) to understand local and regional priorities, and to consider ways to effectively use all available resources. Included in this category of activities are the assignment of liaisons to local Emergency Operations Centers (EOCs), improved customer and public official communications, and investigating ways to improve the timely communication of Estimated Times to Restoration (ETRs). We are developing an integrated multi-channel social media program that will provide communications between the utilities, customers, and government officials during outages. As described in Section 8 of the *Plan*, we appreciate that customer restoration priorities may need to change to accommodate local circumstances and individual events; in that regard, we have a goal to improve our ability to flag critical customers.
- Streamline/standardize the repair process: This category includes both improved tools and improved processes. For example, the Companies are working with the provider of the Automated Roster Call-Out System (ARCOS) to design and roll out ARCOS Crew Manager, a supplementary module to the ARCOS product currently in use to determine day-to-day blue sky field crew availability. ARCOS Crew Manager is specifically intended to identify, assign, manage, and ultimately demobilize employees and contractors who have storm roles and responsibilities, together with their equipment and classifications. It will enable the tracking of crews by location, job (e.g., wire guard) and status (e.g., working or resting) on an hourly basis. Among the important processes to be evaluated for potential improvements are damage assessment and the determination of ETRs, including our commitment to work with Verizon and various key municipal leaders to build a more robust damage assessment protocol. The Companies have executed and continue to pursue contracts with third parties to make contractor crews

specifically available to NYSEG and RG&E during emergency events, and expect to pursue statewide and regional mutual aid improvements in their role as Vice Chair in 2013, and Chair in 2014, of the New York Mutual Aid Group (NYMAG). We are also committed to taking non-traditional resources, such as the National Guard, into consideration as potential emergency support resources. We have agreed to develop a process to provide resources to towns to support make-safe road clearing.

- Strengthen the emergency preparedness/storm center: deepening the storm response bench as discussed above, and updating and standardizing old and new positions in the internal IPG. An internal Emergency Management Operations Council (EMOC) has been created to provide collaborative oversight to this initiative. EOPs will be further refined as discussed above, as will internal reporting and data capture during storms. To achieve success in this area, training of employees and the tracking of that training will also be enhanced.
- Implement storm hardening and associated improvements: NYSEG's and RG&E's capital investments have increased sharply from an average of $229 million a year from 2003-2007 to $414 million in 2012. Our storm hardening and associated improvements initiative includes three categories of activities:
    - Work that can be carried out within the scope of the existing budget. This includes replacing damaged poles and building certain new poles, cross arms, and conductors to a higher NESC standard; installing tree wire conductor and implementing spacer cable construction in highly constricted (concentrated vegetation) areas on rebuild jobs; and installing additional reclosers and other protective devices. To operate within the existing budget, this higher standard will require NYSEG to install fewer new poles overall and complete less re-conductoring mileage.
    - Smaller storm hardening projects. Roughly $1 million of smaller storm hardening projects will be carried out in 2013 using reallocated funds. Infrastructure improvements in the Brewster offices are also underway.
    - Major storm hardening recommendations that will require funding approval. Our internal storm hardening team's recommendations include: (1) building new construction of poles, cross arms, and conductors to a higher NESC construction grade; (2) adding tree wire conductor and implementing spacer cable construction in highly constricted (concentrated vegetation) areas on sub-transmission and distribution; (3) increasing distribution tie capabilities; (4) building a new substation in Brewster and another in Liberty, along with associated transmission lines to increase tie capabilities and transmission system redundancy; (5) reducing point of failure issues by putting selective primary main line feeders and

distribution circuits underground; and (6) hardening transmission and sub-transmission sources into substations; and (7) identifying inaccessible circuits in Brewster and Liberty and relocating those circuits to the roadside where this is cost-beneficial. This body of work will be supplemented with substation and distribution automation, including remote monitoring and control capabilities, and infrastructure improvements in and associated with Division offices, to facilitate the ability of the offices to accommodate the large number of people necessary to operate an ICS from those buildings.

With the support of the New York State government and local and regional authorities, the Companies have been aggressively pursuing federal assistance in the form of Community Development Block Grants (CDBGs) to offset the substantial cost of these storm hardening investments to customers. Our initial proposal was for $1.03 billion, of which the bulk of the funds -- $880 million – would improve system performance in future storms in the Brewster and Liberty Divisions. (The remaining $150 million would mitigate the rate impact of the Spring 2011 storms, Hurricane Irene, Tropical Storm Lee, and Hurricane Sandy.) Unfortunately, utilities were specifically excluded from applying for these funds in the first tranche. The Companies continue to press for utilities to qualify for funding in the remaining tranches.

Finally, trees are a leading cause of power interruptions. In 2010, under the terms of our current rate agreement, we began a program to manage vegetation on all of RG&E's distribution circuits every five years – a best practice in the industry. The PSC also approved an increase in distribution vegetation management funds for NYSEG, but not enough to achieve the five-year standard. Nonetheless, in 2011, NYSEG and RG&E spent $10 million more on distribution vegetation management than the PSC-approved rate plan provided. The total average trees per mile at NYSEG ranges from 56 in the Elmira and Plattsburgh Divisions, to 162 in Brewster and 175 in Liberty. For comparison, the US average is 96 trees per mile. It is the Companies' understanding that NYSEG is the only major public utility in New York to not have tariffs supporting a full five-year distribution trim cycle. Environmental Consultants, Inc. (ECI) have recently undertaken a distribution system cycle optimization study for NYSEG, and recommend that we begin with a Reclamation Cycle, followed by a long-term maintenance cycle. NYSEG will work with DPS and stakeholders in support of its request for a July 2013 Commission order to allow NYSEG to implement these recommendations in 2014. Among the benefits of this program are the potential for a reduction in storm restoration time and cost, and improved safety

to NSYEG workers, NYSEG contractor workers, and the public.[1]

Certification

16 NYCRR §105.3 requires that the Companies certify that within the last twelve months, we have conducted at least one storm drill or emergency exercise and periodically verified and updated contact information as specified in §105.4(b)(5).

§105.2(a) concludes that the purpose of the drill can be achieved through the actual preparation for an advancing storm. During 2012, the July response to the Derecho Event in Elmira area and the October/November response to Hurricane Sandy met this requirement.

The regulations were written in a time when contact lists were typically static and printed (indeed, §105.4(a) specifies that the emergency plan shall be compiled in a loose-leaf manual). Today, these lists are typically maintained electronically in databases that are routinely rather than periodically updated, in cases where the information is not available on the web or otherwise from an external up-to-date source. The Companies continue to maintain those databases and lists as required.

Conclusion

In summary, we are pleased to provide you with the NYSEG and RG&E *2013Electric Utility Emergency Plan.*

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[1] Expected benefits identified by ECI include:

- Reduced tree-caused outages
- Reduced storm restoration costs
- Faster restoration time
- Reduced customer tickets
- Improved customer satisfaction and PR
- Reduced safety risk to workers and public
  - Fewer burn-downs (live wires on the ground)
  - Lines more visible to workers and public
- Reduced liability exposure
  - Personal injury claims
  - Damage claims
- Reduced future vegetation maintenance costs

Questions regarding the attached Plan may be directed to [redacted], [redacted].

Respectfully submitted,

Mark S. Lynch

Attachment

cc: T. Dvorsky
M. Worden

Attachment 1. Power Restoration After Flooding

FLOODING GUIDELINES – Joint Electric and Gas Facilities

1. General

1.1. These guidelines are to be followed when it is anticipated that electric and gas facilities are in danger of being flooded or a formal request is received from an outside agency to shut off electric and gas facilities due to anticipated wide-spread flooding.

1.2. Joint (Gas and Electric) planning leading up to the event - it is imperative that electric and gas operations work closely together as a team.

- The Company Emergency Operations Center will monitor weather forecast information, including lake and river flood level forecasts issued by the National Weather Service
- Participate in County Emergency management planning meetings as needed.
- Conduct continuous canvassing of flash flood prone areas and major river flood prone areas. Monitor conditions on the ground from field reports.
- Local ICS Commanders conduct informational conference calls for ICS Command Staff and for company wide readiness alert
- Request maps and customer outage report lists for suspected flood areas
- Work closely with state, county and local emergency management agencies.

2. ACTION STEPS TO CONSIDER FOR FLOOD RESPONSE

2.1. Turn off customers before flood waters - preventive action

- Work in cooperation with emergency services (mandatory evacuations) as a joint electric and gas team

3. DEACTIVATING ELECTRIC AND GAS SERVICES (PRIOR TO AND DURING FLOODING)

3.1. Turn off customers before flood waters prevent action

- Under the direction of county and local emergency services, gas and electric crews should attempt to shut off as many gas and electric meters as possible in the mandatory evacuation zones prior to flood waters overtaking the area. Work in cooperation with emergency services (mandatory evacuations) or local municipalities
- Break groups into zones
- Lock / boot off meters where possible

3.2. Joint re-entry teams – After flood waters recede

- Turn off remaining electric and gas customers affected and lock gas meters
- Re-energize electric meters/circuits once gas system is deemed safe

3.3. Obtain flood area maps and customer records to coordinate and manage the flood response.

3.4. Obtain CEDAR (code enforcement disaster assistance response) maps if available.

4. REACTIVATING ELECTRIC SERVICES

4.1. Electric services shall not be reactivated until notification is received that the gas has been shut off.

4.2. If electric services and meters are isolated, re-energize after confirmation that areas and basements are no longer flooded.

4.3. Conduct a visual inspection of all electric facilities (service, meter, main, disconnect, breaker/fuse panel).

4.4. Have customer/agent sign a Service Re-connection Form only if the panel box has not been flooded. Refer to Attachment 1 for the form. (This method is utilized if an electrical inspection certificate can not be obtained. During certain events, certified electrical inspectors are not always readily available to perform inspections.)

4.5. If the electric panel or a breaker has been submersed, individual breakers and/or the panel may need to be replaced to insure they will operate safely, as designed, in the future. The customer needs to hire an electrician or call an electric inspection agency for their area for current regulations regarding flooded panel boxes.

4.5.1. Meter intact- not booted

- Remove the meter and perform a visual inspection (proceed if OK)
- Make sure the main disconnect in the house is turned off
- Perform a short circuit test
- Install the meter and reseal

4.5.2. Meter booted

- Perform a visual inspection (proceed if OK)
- Make sure the main disconnect in the house is turned off
- Remove the meter boot
- Perform a short circuit test
- Install a meter and reseal

4.5.3. Meter previously removed

- Perform a visual inspection (proceed if OK)
- Make sure the main disconnect in the house is turned off
- Perform a short circuit test
- Install a meter and reseal

5. Attachments

5.1 The Electric Service Re-connection Form distributed by the NYSEG/RGE electric department to customers for service restoration after flooding follows on the next page.

Flood Service Reconnection Form and Release

1. I hereby authorize New York State Electric & Gas Corporation ("NYSEG") to temporarily reconnect my electric service up to my main disconnect switch ("reconnection").

   _____**[Check if Applicable]** The electrical panel box was damaged and has been replaced; however, an electrical inspection has not yet been performed.

   _____**[Check if Applicable]** There has been flood and water damage in my basement, but the main disconnect and breakers have not been damaged. An electrical inspection has not yet been performed.

2. I forever waive, release and discharge NYSEG, its employees, officers, directors, contractors or agents and their successors and assigns from any and all claims, suits, causes of action or liability whatsoever, which I or my successors or assigns may now or hereafter have against NYSEG, its employees, officers, directors, contractors or agents and their successors and assigns, by reason of any matter arising out of or relating to the reconnection.

3. I agree to indemnify, defend and hold NYSEG, its employees, officers, directors, contractors or agents and their successors and assigns, harmless from and against any and all liability, losses, claims, damages or costs, including reasonable attorneys' fees ("Claims"), for bodily injury (including death) or damage to property, or otherwise, arising out of or in any way

4. Connected with the reconnection.

5. In case any provision of this release should be held contrary to, or invalid, under the laws of the State of New York, such illegality or invalidity, shall not affect in any way, any other provisions hereof, all which shall continue, nevertheless, in full force and effect.

   I have reviewed this document in full and certify that I am authorized to sign it, and I hereby agree to all terms. Customer and an electrician must sign this form.

Address _____

Customer _____
(Print Name)

Customer _____ Date _____
(Signature)

Electrician _____
(Print Name)

Electrician _____ Date _____
(Signature)

Re-Connected By: _____

Employee Name: _____

Attachment 2. Preemptive Power Shutdown

Substation De-Energization – Flooding

The Company Emergency Operations Center monitors weather forecast information, including lake and river flood level forecasts issued by the National Weather Service. If flood level forecasts indicate the potential for major flooding, to the extent where the Company has sustained significant flooding and/or equipment damage to electric substations in past events, the following actions should be taken:

- Company personnel should be dispatched to any substation(s) located in flood-prone areas that may be impacted by the forecasted flood levels, to monitor flood levels in or near the substation(s).
- If flood levels in the substation(s) approach the levels where equipment damage could occur, or equipment may not be able to operate as designed, pre-emptive actions should be taken to de-energize all or a portion of the substation, which may include the interruption of customers served from the substation(s).
- In accordance with New York State Public Service Law 16 NYCRR 13.13, "Disconnection Without Notice," the Company shall, to the extent reasonably feasible under the circumstances, provide advance notice to those whose service will be interrupted as a result of the above noted emergency. [1]

[1] 16 NYCRR 13.13:
(a) *Emergency disconnections.* A utility may only suspend, curtail or disconnect service to a building, unit or piece of equipment, without the notice required under section 13.3 of this Part, when:
(1) an emergency may threaten the health or safety of a person, a surrounding area, or the utility's generation, transportation or distribution systems;
(2) there is a need to make permanent or temporary repairs, changes or improvements in any part of the system;
(3) there is a governmental order or directive requiring the utility to do so.
(b) *Notice.* A utility shall, to the extent reasonably feasible under the circumstances, provide advance notice to those whose service will be interrupted for any of the above reasons.
(c) *Restoration of service.* A utility shall act promptly to restore service as soon as possible after disconnection under this section; provided, however, that service need not be restored to any building, unit, or piece of equipment if, at the time restoration is to occur, the utility has the lawful right to terminate service for another reason pursuant to this section or section 13.3 of this Part.

Attachment 3. Staff Recommendations

Recommendation	Periodic Update(s)[2]	Status
Review report re: fatality investigation August 28, 2011 at Orange & Rockland.	8/27/12, 10/27/12	Complete. See Sections 2, 5.2, 6.4, 8.1.3, 8.2.2 and 9 of the *Plan* and Wire Guard Management EOP.
Develop procedures relating to the use of contracted damage assessors, including training requirements.	8/27/12	Complete. See Section 5.1 of the *Plan*.
Better define minimum staffing requirements for the number of wire guards	8/27/12, 10/29/12	Complete. See Section 5.2 of the *Plan* and Wire Guard Management EOP.
Identify alternate staffing levels when conditions, such as a hurricane, will likely cause an increase in the number of wires down.	8/27/12, 10/29/12	Complete. See Section 5.2 of the *Plan.*
Identify means to obtain supplemental wire guards through contractors during or prior to an emergency when employees are not available to serve as guards because they are needed for alternate function	8/27/12, 10/29/12	Complete. See Sections 5.2 and 5.5 of the *Plan* and Securing Contractors EOP.
Train more wire guards in Brewster, Lancaster, Liberty, and Oneonta divisions.	8/27/12, 10/29/12	Complete. See Section 5.2 and 6.4 of the *Plan*.
Define procedures for obtaining crews from distant states. Emergency plans should include contact information for utilities, contractors, and mutual assistance groups and acknowledge travel and rest time restrictions before the crews can be deployed into the field.	8/27/12, 10/29/12	Complete. See Section 5.3 of the *Plan* and ACPS External Contacts and Securing Contractor EOPs.
Review facilities susceptible to outside factors (flooding, excessive tree damage, or limited access) to determine whether infrastructure improvement or increased maintenance could be made to reduce	8/27/12	Complete. See Section 6.5 of *Plan.*

[2] Completion, implementation, and integration of the Staff recommendations as a result of Hurricane Irene, Tropical Storm Lee, and the 2011 October Snow Storms were originally detailed in periodic updates filed with the Secretary in Cases 11-M-0481 (In the Matter of the Outages Caused by Hurricane Irene and Tropical Storm Lee) and 11-M-0595 (In the matter of the Outages Caused by the October 2011 Nor'easter) on August 27 and October 29, 2012, and January 28, 2013.

Recommendation	Periodic Update(s)[2]	Status
customer impact or facilitate ability to restore service.		
Formalize agreements with property owners to temporarily stage crews, materials, and equipment during restoration at strategic locations.	8/27/12, 10/29/12	Complete. See Section 7 of the *Plan* and Division Emergency Plans.
Provide a local presence in severely impacted areas and identify alternative means to improve communications with county offices.	8/27/12, 10/29/12, 1/28/13	Complete. See Sections 7 and 9.7 of the *Plan* and County EOC Liaison EOP.
Develop procedure and verification processes to ensure local and regional ETRs will be issued in a timelier manner.	8/27/12, 10/29/12	Complete. See Sections 8.1.1.5 and 8.2.1 of the *Plan*.
Establish optimal crew deployment to achieve restoration for the largest number of customers in the least amount of time.	8/27/12	Complete. See Section 8.2 of the *Plan.*
Define repair priorities of energized wires down during storm and post storm, considering potential for public harm (population density, level of pedestrian access, and proximity of facilities such as schools) and the safety of utility employees.	8/27/12	Complete. See Section 8.2 of the *Plan.*
Provide ETRs different from global projection for regional sections of service territory (may be smaller than divisions). Continue to refine ETRs until all localities have their own ETRs.	8/27/12	Complete. See Section 8.2.1 of the *Plan* and ETR EOPs.
Enhance ETR presentation on website maps.	8/27/12	Complete. See Section 9.2 of the *Plan.*
Investigate ways to continue to expand use of newer technologies to communicate with customers during outages (i.e., email, text messaging, and social media) and report their findings to Staff.	8/27/12, 10/29/12, 1/28/13	Complete. See Section 9.2 of the *Plan*.
Develop procedures to contact LSE customers before storms.	8/27/12, 10/29/12	Complete. See Section 9.3.3 of the *Plan.*
Work with referral entities to strengthen follow-up processes and to ensure that feedback regarding LSE customers referred for contact assistance are obtained and recorded.	8/27/12	Complete. See Section 9.3.3 of the *Plan.*
Review procurement procedures and identify additional contractors who can provide dry	8/27/12	Complete. See Section 9.6 of the *Plan* and

Recommendation	Periodic Update(s)[2]	Status
ice during storms impacting the East.		Dry Ice Activation/Bottled Water EOP.
Develop process to use municipal field liaisons or a similar process to facilitate the removal of hazardous conditions.	8/27/12, 10/29/12	Complete. See Section 9.7 of the *Plan.*
Extend invitations to local and state elected officials representing districts to be included on municipal calls.	8/27/12	Complete. See Section 9.7 of the *Plan*.
Define guidelines for writing self-assessment reports that contain all appropriate information and provide a comprehensive discussion of key decisions and actions taken.	8/27/12, 10/29/12	Complete. See Section 10 of the *Plan.*
Develop better reporting protocols to ensure the Department is kept informed (re: Gas).	8/27/12	Complete. The Companies' Gas Operations has procedures in place to comply with all notification and reporting requirements as identified by state regulations (e.g., 16NYCRR Part 255).

NEW YORK STATE ELECTRIC & GAS
AND
ROCHESTER GAS & ELECTRIC

ELECTRIC UTILITY EMERGENCY PLAN

Revised
March 2013

Executive's Message

Our company is frequently tested by severe weather and other unforeseen events that can threaten or damage the electrical system. We have a fundamental responsibility to the public to keep our service operating and to restore it promptly when it is damaged. Although each of us has different responsibilities, we should all be proud of how well this company meets each challenge and absorbs the lessons of each event to improve our response for the next time.

We all know the importance of responding quickly in an emergency, yet nothing matters more than having every employee return home safely to his or her family at the end of the work day. Safety must be our number one priority in any emergency—safety for ourselves, our co-workers, and the public. The *NYSEG and RG&E Electric Utility Emergency Plan* provides the framework for a safe, effective response in an emergency, so we can restore service without incident or delay.

Whether an outage affects a few hundred customers, tens of thousands or more, our customers count on us to do our job right. Our experience in past emergency situations has taught us the importance of being prepared and flexible, and we have incorporated those lessons into this plan. It provides a clear structure for accountability and communications, it sets the priorities for our efforts, it provides for effective cooperation with local and regional officials, and it ensures that we manage our resources efficiently.

Finally, we expect all employees at NYSEG and RG&E, IUSA and IUMC to be familiar with this plan. Our business has a unique obligation to the public, who depend on us to respond in critical situations. Each of us should understand what needs to be done and should be ready to contribute when called upon. We are confident that we are prepared, and when faced with the next challenge, we will respond safely and effectively to restore our system and maintain the confidence of our customers.

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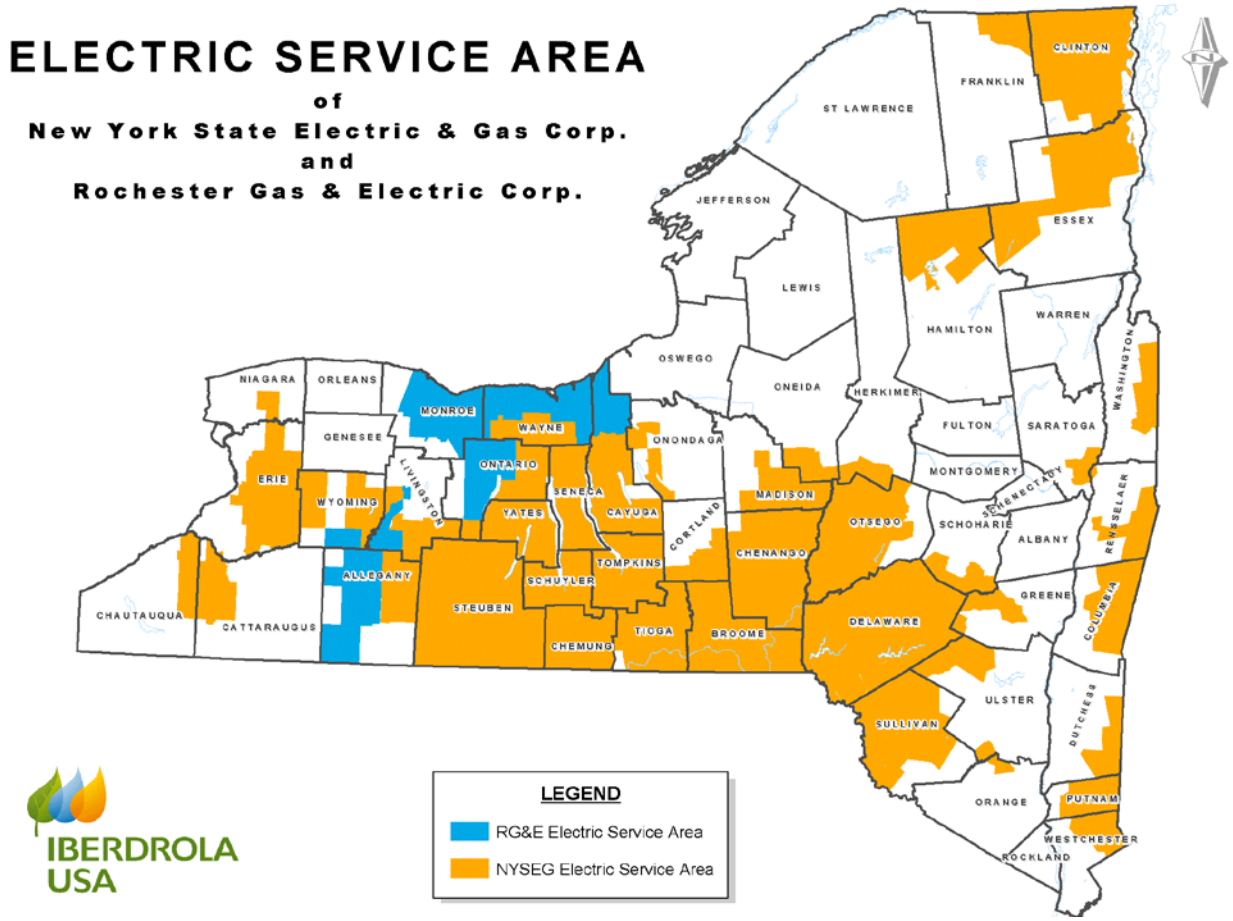
Appendices:

1. INTRODUCTION

Reliable electric service is vital to the welfare and comfort of both New York State Electric & Gas Corporation's (NYSEG's) and Rochester Gas and Electric Corporation's (RG&E's) (collectively referred to as the Companies) customers. Together with Iberdrola USA (IUSA) and Iberdrola USA Management Corporation (IUMC), as well as our sister utilities (Central Maine Power, Maine Natural Gas, and New Hampshire Natural Gas), the Companies consider providing customers with reliable service to be a responsibility of the highest order. This *NYSEG and RG&E Electric Utility Emergency Plan* (*Plan*) illustrates the Companies' readiness to handle electric emergencies.

The Companies serve a large geographic area as shown on the map below, and must respond to a wide variety of emergency conditions, customer demands, and service constraints. Consequently, the *Plan* is designed to provide guidelines that control system-wide response, while allowing for the flexibility needed to meet customer needs in particular localities or during specific events.



The *Plan* purpose is to provide a framework to ensure the safe, fast, and reliable restoration of electric service to the customers in our franchises as a result of both localized and widespread events. The Plan is designed to be flexible and to be scaled to provide the appropriate response in order to effectively respond to the circumstances surrounding each emergency.

The *Plan* objectives are to:

- Ensure the safety of employees, contractors, customers, and the public;

- Establish procedures that facilitate prompt and efficient response utilizing the Incident Command System (ICS) concepts and provide a coordinated and systematic approach to emergency preparedness and response;
- Minimize service interruption time and the resulting impacts to customers;
- Provide information to customers and officials on response progress; and
- Provide a measure for evaluating the Companies' recovery from emergencies and a process for self-assessment and continuous improvement.

The *Plan* complies with 16 NYCRR §105 (see Appendix A to this *Plan*) regarding electric utility emergency plans, as well as the December 30, 2010 DPS Staff Estimated Time of Restoration Guidelines and the December 15, 2008 Event Notification Requirements (see Appendix B to this *Plan*). No confidential information has been incorporated into this *Plan,* enabling it to be made publicly available without redaction at the Companies' corporate headquarters at 89 East Avenue, Rochester, New York, as §105.3 requires.

Consistent with the Commission's regulations, the Companies may modify this *Plan* under emergency conditions during an event to the extent required to restore service in a safe and efficient manner. If so, those modifications and the circumstances that caused them will be reported in writing to the Secretary of the Commission within 60 days from restoration of full service.

1.1 Overview

As outlined in Section 2, event response work can be dangerous, and it is critical that everyone continue to maintain safety awareness, practice safe behaviors, and to look out for one another during these challenging events.

Events to which this *Plan* applies can be localized or widespread, major or minor. The classification of emergency events is described in more detail in Section 3.

The *Plan* is modeled after the National Incident Management System (NIMS). NIMS is the system mandated by Homeland Security to ensure a consistent nationwide approach for Federal, State, local, and tribal governments; the private-sector; and non-governmental organizations to work effectively and efficiently together to prepare for, respond to, and recover from domestic incidents, regardless of cause, size, or complexity.

The *Plan* establishes a standard so that all responders, both inside and outside the Companies, can work effectively together. It is specifically designed to provide for the adoption of a flexible, integrated organizational structure that allows the Companies to respond to small, medium and large outages in an effective and efficient manner.

For local emergencies, channels of communication and field operations are coordinated by the ICS. The Incident Commander (IC) is the individual responsible for all incident activities, including the development of strategies and tactics, and the ordering and release of resources. When events interrupt service to customers, employees, mutual aid support and/or contractors are mobilized, as required, to enable a safe, organized, and efficient response. The IC has overall authority and responsibility for the management of all emergency response operations.

For emergencies of wider Company impact involving more than one ICS, the system Area Command Planning Section (ACPS) will be activated. An Area Commander (AC) is then responsible for planning, coordination, monitoring, and oversight at the corporate level.

At each level within the emergency response organization, individuals with primary responsibility positions have distinct titles and follow a chain of command. Titles provide a common standard for all users. The use of standardized position titles also assures that everyone will know who is in charge and who to report to. It is critical in emergency situations that there be no confusion with respect to who is steering the response effort.

In general, the Companies deploy as many crews as they determine are needed to safely and quickly restore service in each affected area. The Companies have a process for supplementing their local workforces with resources from other unaffected areas, as well as Mutual Aid from other utilities and contactors.

The ICS and ACPS are discussed in more detail in Section 4. The availability and use of field resources – the backbone upon which all service restoration depends – is described in Section 5.

As described in Section 6, the Companies are committed to having a trained work force available at all times to implement necessary emergency procedures. The Companies know that preparedness is the key to a successful operation. Preparedness begins long before being faced with an emergency and is implemented through a continuous cycle of planning, training, and evaluation**.** During the *Plan*'s Annual Drills, the Companies examine event support functions which include transportation, inventory, crew tracking, meals, lodging, assessing, mutual aid, communications and information technology.

The framework for preparation for individual events and subsequent restoration and demobilization is provided in Sections 7 and 8 of the *Plan*, respectively.

The Companies recognize that communications with customers, local and State government agencies, and with the media are paramount to effective emergency recovery coordination. Section 9 of the *Plan* provides guidelines and requirements to be fulfilled at the local and corporate levels regarding communications. These guidelines and related requirements are expanded, as necessary, on the local level to ensure that customer requirements unique to specific areas can be effectively fulfilled. The Companies' belief is that better information leads to better communication, which in turn leads to better customer service.

The timely and adequate availability of facilities, equipment, vehicles, materials, and supplies is also critical to successful restoration, as described in Section 10.

Finally, Section 11 explains that each emergency, by its very nature, is unique and offers opportunities to learn from the experience. The Companies will continue to evaluate our response to each emergency and to amend or modify the *Plan* and its supporting documents, as appropriate.

1.2 Related Documents

This *Plan* is the primary document governing the Companies' emergency preparedness and storm response. Our ICS Positions Guide (IPG) contains ACPS and ICS position descriptions, and our Emergency Operating Procedures (EOPs) provide technical guidance in a number of areas as listed in Appendix C. Contact information is typically centrally maintained on-line.

Individual Divisions also develop their own supplemental Division Annex to capture contact information that is not centrally maintained or available on the web or from other sources. The Division Annex also provides the local ICS organization and, as appropriate and available, Division ICS floor plans and staging areas. Much of the information in these documents is confidential. However, redacted versions of these plans (confidential information removed) are available for public inspection at these RG&E and NYSEG Divisional offices:

- Auburn: 73 Wright Circle
- Binghamton: 4425 Old Vestal Road, Vestal
- Brewster: Terravest Corporate Park, 35 Milan Road
- Elmira: One Electric Parkway, Horseheads
- Geneva: 152 Border City Road
- Hornell: 7760 Industrial Park Road, Arkport
- Ithaca: 1387 Dryden Road
- Lancaster: 150 Erie Street
- Liberty: 26 Wierk Avenue
- Lockport: 6544 Lincoln Avenue
- Mechanicville: 6 Werner Road, Route 146, Clifton Park
- Oneonta: 65 Country Club Road
- Plattsburgh: 4125 Route 22
- Rochester: 89 East Avenue

2. SAFETY

Nothing is more important to us than safety during all event response activities. The safety of employees and customers, as well as the general public, is always our first concern.

During response work, Company employees (and contractors) act according to established safety codes.

Safety awareness is conveyed in many ways prior to events and during the event response process, including: (1) the issuance of weather alerts; (2) discussion of safety issues at the start of all event preparation and response update conference calls and status reports; (3) discussion of safety awareness reminders with all employees in daily meetings before being released to work; (4) "tailboard" meetings conducted with all internal and external response crews and support staff to cover the daily safety hazards and stress the practice of safe behaviors at all times; (5) thorough training of all internal crews in Company, State and federal safety policies, procedures and regulations; (6) information provided to customers and the general public through the media and event-related news releases to remind them to stay away from downed wires and treat them all as if they were energized; and (7) information provided throughout the year in bill inserts, news releases and on the Companies' web sites about safety topics, such as staying away from fallen or low-hanging wires, reporting damaged Company facilities immediately, installing and using generators safely, what to do in case of a flooded basement, and the safe use of alternate heating sources. Efficient restoration of power is critically important, but avoiding accidents, injuries and deaths is the highest priority.

During emergency response, public safety is of highest concern. Both site safety and operations during an event are coordinated within Electric Operations, and the individuals involved in these two functions are most often at the same physical location, making communication and coordination between these groups ongoing and frequent.

Priority is given to cases indicating that dangerous conditions exist and where danger to life is involved. Damaged electric utility facilities can be a hazard to public safety. Consequently, the Companies follow special procedures to protect the public during events. Upon receiving reports of downed conductors, Company personnel prioritize these reports and secure such areas, as necessary. To protect local residents and the broader public, barricades, lights, flares, or other methods may be used identify hazardous areas. In addition, local press releases are sent out to the media with safety tips, including warning the public of the danger of downed power lines and encouraging them to report any that are found. More information in this regard is included in Sections 8 and 9 of this *Plan.*

3. EVENT CLASSIFICATIONS

The Companies use three classifications to categorize the level of damage an event may cause to the system and the level of response required to restore electric service. An event's classification is based on the resources required to restore power, which is normally based on the extent of damage and the estimated time needed to restore service. Consequently, an emergency's classification level may change if warranted by changing field conditions.

Class I Emergencies:

Class I emergencies are events which affect specific isolated parts of a Division and which cause damages that can be repaired in 24 hours or less. For a Class I event, additional resources are brought in, as necessary, to complete response activities. The Incident Command System (ICS) structure is activated, as necessary, to coordinate all activities. The number of resources activated to support response activities depends upon the nature of damage, the locations affected, and the number of customers whose service has been interrupted. The Area Command Planning Section (ACPS) is generally not activated for Class I events.

Class II Emergencies:

Emergencies that cause extensive damage throughout a Division are classified as Class II events. Service interrupted by a Class II emergency can, in general, be restored within 48 hours. A Division usually activates their ICS structure in a more expanded form than for a Class I event. Repairs may require assistance from other resources within the Division. Class II events may span multiple Divisions, however, each area generally has sufficient resources to support response activities using their own personnel. The ACPS may be activated to monitor activities and coordinate the transfer of limited personnel, equipment, or material between Divisions if shortages are identified.

Class III Emergencies:

This classification refers to severe events that cause widespread damage within a Division or that affects multiple Divisions. Damage caused by Class III events generally requires more than 48 hours to restore. To restore service in affected areas, it is necessary to enlist support from other Divisions. Often Mutual Aid from other utilities and/or contracting companies is also required. Specialized services, such as helicopter crews, may also be required as well. During a Class III event, the ICS structure is activated and generally expanded beyond what is used during a Class II emergency. Also, the ACPS is activated to monitor and oversee preparation and response activities, report on progress, assist the affected areas with analysis, and coordinate the transfer of personnel, equipment, or material to affected Divisions.

New York Public Service Commission (PSC) regulations (16 NYCRR §97.1(c)) also provide this definition of a major storm: "A major storm is a period of adverse weather during which service interruptions affect at least 10 percent of the customers in an operating area and/or result in customers being without electric service for durations of at least 24 hours." This classification is used for reporting service interruptions to the PSC, and is also used to determine when it is appropriate to defer incremental costs associated with a storm for future recovery in rates. For purposes of this definition, an operating area is synonymous with a NYSEG or RG&E Division.

4. AREA AND INCIDENT COMMAND SYSTEM AND RESPONSIBILITIES

The Companies' emergency management structure and responsibilities are based upon the Incident Command System (ICS) framework developed by the National Incident Management System (NIMS), and more specifically, on the NIMS Incident Command System Emergency Responder ICS Positions Guide[1]. The Companies' ICS organizational structure has been modified to accommodate the utilities sector. It is intended to be flexible and expand or contract as a situation warrants.

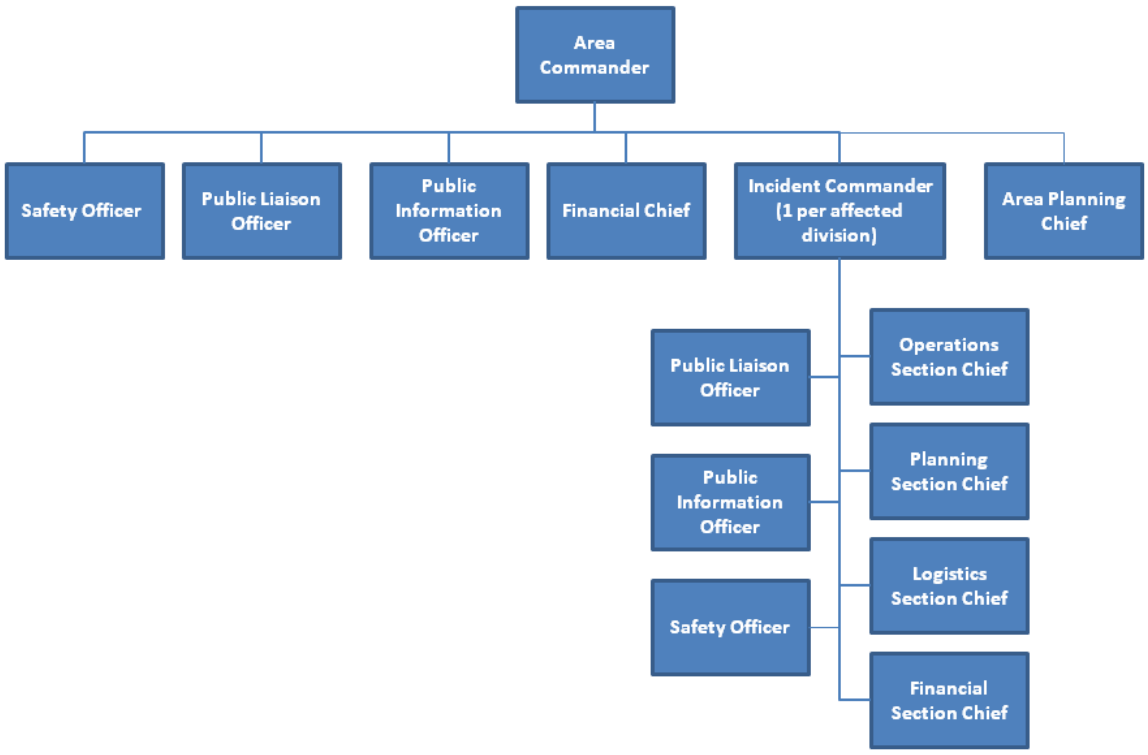
Within each affected Division, the Incident Commander is responsible for all aspects of response unless and until he/she activates other ICS roles and delegates tasks to those individuals. Depending upon the scope of an emergency, the Incident Commander has the option of activating whichever positions will add value to management of the current event. A key ICS concept is to maintain a manageable span of control; typically with three to seven subordinates to each position. As an event escalates, the number of involved personnel will also grow and the ICS will expand in order to maintain a manageable span of control. Reporting to the Incident Commander are General Staff (Section Chiefs), who have Branch Directors and other personnel reporting to them during an emergency, and Command Staff (Officers), who do not.

NYSEG and RG&E have extended the ICS framework to include an Area Command (AC) level. For emergencies of wider Company impact involving more than one Incident Command, the system Area Command may also be activated. The Area Command Planning Section (APCS) is always activated for Class III events and may be activated for Class II events but is rarely activated for Class I events (as described in Section 3). This structure ensures that priorities are based on system-wide needs and that Division operations are consistent with corporate responsibilities. The AC coordinates pre-event activities, including monitoring weather forecast information and issuing weather alerts across the Companies, conducting event preparatory conference calls, and initiating proactive mutual aid crew deployment, when warranted. As a major event materializes, the AC is responsible for monitoring and overseeing the effective preparation and response. The AC coordinates periodic event update conference calls, coordinates all mutual aid crew, support staff and equipment movements, prepares and submits PSC Electric Outage Reporting System (EORS) reports, when required, monitors the operation of the Outage Management System (OMS), and completes other duties, as requested. When event response has been completed, the AC coordinates demobilization activities with the Divisions, coordinates a post-event assessment, and prepares any event reports that are required.

An example of the AC/IC structure used by NYSEG and RG&E is shown below:

[1] http://montanadma.org/sites/default/files/FEMA-2009-0014-0002-1_0.pdf

NYSEG / RG&E ACPS/ICS



ICS position descriptions are maintained in the Companies' ICS Positions Guide (IPG). All internal personnel with service restoration responsibilities other than field resources are identified in a central database that is maintained on an ongoing basis to accommodate employees who join or leave the Company, or change emergency roles for other reasons. In addition, local personnel with specific ICS responsibilities are identified in their Division Annex.

5. FIELD RESOURCES

Field resources are part of the Incident Command System (ICS) and are key to all restoration activities. Those storm roles which are most closely connected to restoration include: damage assessors, wire guards, line crews, and vegetation management crews. Details regarding position descriptions discussed in this section are maintained in ICS Positions Guide (IPG). Contact information for Mutual Aid companies and contractors that provide field resources (including damage assessors, line crews, and tree crews) is maintained with all such vendor data in SAP.

The Companies, based on experience, comparable weather forecast and storm history initially deploy as many crews as they determine are needed to safely and quickly restore service in each affected area. The number of crews that can be used, in response to a particular event, may be limited due to geographic constraints and because of the nature of the damage, including closed roads. The Companies have a process for supplementing their local workforces with resources from other unaffected areas, as well as Mutual Aid from other utilities and contactors. A number of variables, including the number and type of crews needed, the time to determine the availability of, and to acquire resources, proximity and projected response times of resources, are considered in the determination. In general, if Company crews are readily available, using them first contributes to quick and safe response. However, the Companies do not hesitate to call for crews from other utilities or contractors whenever they believe it is necessary or would contribute to rapid and safe response. Also note that as an event progresses, additional resources may be requested and deployed due to the dynamic nature of the event and as resource requirements change. All resource movements of this nature are coordinated through the Area Command Planning Section (ACPS).

5.1 Damage Assessors

Damage assessment is a useful tool for cataloging damage caused by severe weather. Company personnel are assigned and trained as damage assessors to support this storm role. The Companies also retain contractor damage assessors if needed. The Companies have reached agreement with contractors to mobilize additional trained damage assessors if needed.

The responsibilities of damage assessors include:

- Complete accurate surveys on assigned distribution circuits.
- Identify and categorize the nature of damage and identify specific locations.
- Identify and report emergency situations.

The main objectives of the damage assessment role include:

- Effectively gather and process damage observations to support resource planning purposes.
- Provide sufficient detail to ensure accurate estimates of restoration efforts necessary.
- Complete in a timely manner so as to be useful in the restoration planning process.

Two type of damage assessment are typically performed during an event:

- Initially, a preliminary assessment is typically performed. The purpose of this assessment is to capture the most critical information (e.g., broken pole locations, repairs in difficult to access locations, extreme tree conditions, etc.) as rapidly as possible. This information

is critical to the initial restoration planning efforts.

- Later, a detailed assessment (i.e., circuit sweep) may be conducted. These assessments are typically completed after initial restoration has been completed. Their purpose is to capture more detailed to documentation such as: instances where temporary repairs need to be made permanent, additional tree trimming is required, new equipment documentation, etc.

Each Division strives to maintain the resources necessary to conduct a preliminary damage assessment for the three-phase and impacted circuits as rapidly as is safe and practical during the first daylight opportunity during an event.

For extreme events, or in circumstances that make travel more difficult than usual, additional assistance is sought through the ACPS. The ACPS has the ability to move resources between areas or to engage additional resources to support the damage assessment function.

5.2 Wire Guards

Wire guards may be deployed as needed during the initial make safe phase of restoration. During events, public and employee safety are our first priorities, and downed wires can represent a public safety risk. Although downed wires cannot be prevented, and there may be overwhelming numbers in the aftermath of some events, NYSEG/RG&E will respond in as timely a manner as practicable to ensure that downed wires are guarded, barricaded and/or made safe.

Wire guard responsibilities include:

- Ability to recognize various classifications of wire (e.g., primary distribution, secondary, telephone, CATV cable, etc.)
- Ability to access situations and barricade appropriately while maintaining public and employee safety.
- Familiarization with incident coding and reporting protocols associated with wire down management
- Remaining on site until the situation is made safe.

Each Division will maintain individuals trained in the wire guard role. If additional wire guards are required the Area Command Planning Section can mobilize additional wire guards from other areas or from contractor resources. The Companies have reached agreement with contractors to mobilize additional trained wire guards if needed.

Wire guard staffing for an event is dependent upon a variety of factors. Factors that influence staffing levels includes: type of damage, percentage of circuits locked out at the substation, size of the area affected, type of distribution system (radial or loop), population density, etc.

For Class I storms many of the wires down reports will be assigned to responding line crews and/or supervisors. Wire guards will be used as needed. In Class II events, wire guards will typically be activated as part of the Incident Command Operations Section. Local resources are typically sufficient to handle wire guard needs during Class II events. For Class III events it is anticipated that the Wire Down Branch Director (WDBD) will be activated as part of the Operations section

and will manage wire guard assignments. Also, for Class III events it is anticipated that wire guards from other divisions and/or external sources may be needed.

5.3 Line and Service Crews

The Companies utilize line crews in response to all electric emergencies, and occasionally utilize dedicated service crews.

The Companies utilize local resources and secure additional resources as needed to safely and effectively respond to system emergencies. Staffing levels are determined by taking into account various factors including: type and potential severity of the weather event (snow, ice storm, heavy rain/flooding, high winds, or hurricane), total area to be impacted (multiple states, statewide, multiple Divisions, individual Divisions), timing of the event (normal workday, weekend/holiday, immediately following another major weather event, etc.).

The Companies may determine to prepare internal crews and support staff and/or secure Mutual Aid support from other utilities and/or contractors to be deployed either:

- In anticipation of the weather event
- During the weather event, when it is anticipated that significant damage or customer outages will be incurred
- After the weather event, when preliminary damage assessments have been completed and a determination is made that there is a need for additional support beyond the local Company resources.

When appropriate, the Companies will pre-stage internal and/or contractor resources in anticipation of pending severe weather events; however, the Companies are obligated to adhere to the commitment to the New York Mutual Aid Group (NYMAG) organization to hold requests for external utility mutual aid support until such time as an actual need for resources is identified. The Companies have reached agreement with several contractor resources and have a notification process in place to expedite the securing of contract response line, service and tree crew resources to supplement internal resources and/or mutual aid resources from other utilities.

The number and type of resources required to respond to Class I, II and III emergency weather events is determined using information including, but not limited to:

- Damage estimates obtained from damage assessments (broken poles, spans down, distribution transformers damaged, etc.)
- Scope of the damage (distribution and/or transmission circuits impacted)
- Number of trouble and outage incidents indicated in Outage Management System (OMS)
- Amount of tree damage and road conditions in the affected areas
- Terrain of the impacted areas and where the damage is located
- Number of wires down incidents that must be made safe.

For Class I and II Emergencies, generally only local Division resources are required to effectively address the system damage and complete the restoration. However, internal resources from a neighboring Division may also be utilized to complete the restoration, depending on the type and extent of the damage. Class III Emergencies will generally require additional resources to complete make response activities. Depending on the size of the impacted area(s), internal

resources, mutual aid resources and/or contractor resources may be secured and deployed to assist in the response activities. External crews are generally assigned a local resource to guide the crews to their work assignments, to receive instruction and provide communication with the main office.

The number of crews that can be used, in response to a particular event, may be limited due to geographic constraints and because of the nature of the damage, including closed roads. Injecting more crews than can be used productively under those circumstances will generally complicate coordination and slow response. The Companies supplement their local workforces with resources from other unaffected areas, as well as Mutual Aid from other utilities and contactors. A number of variables, including the number and type of crews needed, the time to determine the availability of, and to acquire resources, proximity and projected response times of resources, are considered in the determination. As an event progresses, additional resources may be requested and deployed due to the dynamic nature of the event and as resource requirements change. All resource movements of this nature are coordinated through the ACPS.

In general, line crews are responsible for make safe activities for wires-down incidents and restoration work including:

- Make safe: de-energizing and clearing the area, as necessary.
- Restoration: replacement or repair of equipment and materials on the transmission, distribution, or secondary systems; or to customer services.

Work hours and schedules are structured to support the maximum response effectiveness while still fostering safe working conditions. Although the needs of each emergency are unique, it is common practice to work around-the-clock with all available resources for the first 24 to 36 hours of an event. During this initial period, wires down and other hazardous situations are made safe. After this initial period, some resources are assigned overnight to cover emergencies while the majority of crews move to a schedule of approximately 17 hours on-duty and 7 hours off-duty. The schedule is designed to maximize the use of daylight hours. During the rest period for these crews, management and support personnel assess work completed, new outages, and damage, while planning response activities for the next operational period(s).

Requests for additional resources or for specialized resources (helicopters, tracked equipment, etc.) are coordinated through contact with the ACPS. The ACPS assigns resources so that the most beneficial use of resources across the Companies is achieved.

5.4 Tree Crews

Tree crews support line clearance and tree debris removal. Tree crew size varies depending upon:

- The type of work being done (transmission or distribution support)
- Location (on-road or off-road, climbing or bucket work, etc.)
- Equipment utilized (clearance, brush removal, etc.)

Similar strategies for acquisition, staging, and deployment apply for tree crews as was discussed above under the line crew section. Also, scheduling, requests for specialty equipment, and planning for the next operating period follow the same process as described for line crews as well.

5.5 Non-Traditional Resources

Resources may be made available to the Companies from other sources during storms or storm restoration, such as the National Guard or skilled and unskilled volunteers. Under the direction of the ACPS, the Companies will utilize such resources as appropriate during individual events, taking into account level of resource training, needs, constraints, and such factors as safety and the availability of personnel to guide, direct, coordinate, and oversee the work.

6. READINESS

The Companies maintain an ongoing readiness to address electric storm emergency planning and preparation throughout the year. A summary of documentation, communications, equipment, and training /drills is provided in this section.

6.1 Documentation

This *Plan* is reviewed, revised, and filed with the PSC by April 1 of each year. The Division Annex, ICS Positions Guide (IPG), and Emergency Operating Procedures (EOPs) are reviewed at least once a year.

16 NYCRR §105.4(b)(5) specifies that contact lists should be updated at least semiannually. The regulations were written at a time when contact lists were typically static and printed (indeed, §105.4(a) specifies that the emergency plan shall be compiled in a loose-leaf manual). Today, these lists are typically maintained electronically in databases that are routinely (rather than episodically) updated, and in some cases where the information may be electronically available on the web or from an otherwise up-to-date external source. The Companies continue to maintain those internal databases and lists as required.

6.2 Communications

External communications and outreach during the year, when emergencies are not in progress, include the following:

- The Companies provide information to customers on both summer and winter storm preparation (both the Companies and the customers' preparations) in *EnergyLines* (our bill inserts), in our brochures *Weathering Storm Emergencies* and *Generator Safety* and on the Company web sites http://www.nyseg.com/ and http://www.rge.com/.
- Communications with Life Support Equipment (LSE) customers to encourage them to be prepared for emergencies are further discussed in Section 9.
- Outreach personnel and Division managers contact public officials on an ongoing basis to discuss emergency procedures, response methods and restoration priorities, and to exchange contact information.
- Monthly tests of the Electric Outage Reporting System (EORS) are conducted to insure that the system remains operational. The system is tested on the first Tuesday of each month by communicating test data to the PSC.

6.3 Equipment

Stock on hand is reviewed and orders are placed with suppliers to bring inventory levels up to maximum quantities. Included in the review are inventory items that are used to repair electric infrastructure typically damaged by in a storm. This includes items such as poles, cross arms, transformers, wire, connectors, fuses, and other electric hardware.

Critical distribution, transmission and gas inventory is reviewed weekly to ensure established quantities of critical material are maintained at a rate of 98.5%. Inventory review is also included in

the Companies' pre-storm checklist and is evaluated during the planning and preparation for possible events.

Wire guard kits and their maintenance are reviewed and supplemented between storm events.

6.4 Training and Drills

The Companies provide three forms of instruction: general training, specialized training, and drills. This section documents these activities. The Companies also participate in drills/exercises conducted by external parties (for example, county emergency management offices).

The Director, Talent Management, Diversity & Inclusion is responsible for managing the overall training program. Vice President of T&D operations is responsible for evaluating the effectiveness of this training.

General training includes review of the emergency *Plan* and the purpose and scope of this document. Everyone at NYSEG, RG&E, IUSA, and IUMC is expected to be familiar with the *Plan*. During 2013, the Companies will require that all IUSA, IUMC, NYSEG, and RG&E employees working in New York, beginning with all salaried employees, will have a role in support of storms and emergencies, with exceptions on a case-by-case basis. Identified employees will be trained in the ICS modules 100, 200 and 700 during 2013 through interactive web-based courses conducted by the Federal Energy Management Agency Emergency Management Institute (FEMA EMI).

Specialized training is conducted to familiarize personnel with specific duties or skills that are related to the particular storm role they are associated with. These may be duties that an individual is asked to perform as a part of their storm role but may not be related to their normal job function.

Specialized training is held as needed, and may require classroom instruction, on-line training, webinars, and/or practice sessions. The types of specialized training conducted include:

- Damage assessment
- Wire guarding
- OMS management and analysis
- Dry ice distribution
- Customer calls and callbacks
- Foreign crew guides and Branch Directors
- County and local liaison
- Generator installation
- Water pumping

Drills are used to engage employees in order to practice specific response duties and tasks. Local drills to address particular aspects of emergency response may be conducted as appropriate, and personnel outside the Company may be offered an opportunity to participate in those drills. Annual drills are held in accordance with 16 NYCRR §105.2, although Divisions that were engaged in a Class III emergency within the last year may be exempted from this requirement.

The purpose of this exercise is to refresh the skills of employees assigned to response tasks that may be outside of their normal areas of responsibility. Drill scenarios are established ahead of time and

generally draw from previous storm post-assessment and areas identified for revision or improvement. Drill scenarios are not shared with participants until the day of the drill. Various injects may be introduced into the drill, at the discretion of the coordinator, to test reaction to unplanned or changing circumstances. The drill will involve contacts with outside agencies, local governments and others who would normally be included in service restoration responses. Division management is responsible for conducting and evaluating the Annual Drill. This drill is typically conducted in the Fall of the year. Department of Public Service (DPS) Staff will be notified at least two weeks in advance of the scheduled annual drills.

6.5 Limit Impact of Emergency Events

Two types of initiatives are most likely to limit the risk that customers will experience outages during an emergency, or reduce the duration of those outages: electric system modifications and vegetation management.

In addition to day-to-day emergency planning and response, a review of facilities for susceptibility to outside factors such as flooding, excessive tree damage, or limited access is a long term initiative and must be considered in parallel with reliability issues, safety, and other factors. This factor has been added to our facility evaluation criteria and will be considered as future construction projects are approved.

The Companies have identified system hardening and vegetation management initiatives for which funding will be pursued during 2013 and 2014.

7. EVENT PREPARATION

The System Alert program alerts designated Divisions and corporate personnel of imminent and severe weather that is a threat to the transmission and distribution system. At all times, corporate and field management will be operating in one of three conditions:

- Normal: No severe weather hazards are being experienced nor are they imminent. Division and field management is operating under normal conditions.
- Alert: Severe weather is imminent and poses a significant threat to one or more parts of the transmission and distribution system.
- Response: Corporate and Division management have activated the Incident Command System (ICS) structure and are actively engaged in response activities throughout one or more areas of the Companies.

An alert raises awareness to the likelihood of severe weather. This is a recommendation for increased awareness and planning in order to mitigate damage or prepare for response. Alert status is communicated through various channels including: weather forecasts, outreach to individual Incident Commanders (ICs), storm preparation conference calls, corporate-wide messaging, etc. Additional management directives may be issued depending upon the specific nature of the weather threat.

The intent of an alert is to raise the level of awareness and preparation for a potential event. Depending upon the various weather factors (such as timing, severity, location, etc.) various means of communicating alert information will be used. The most common channels for communicating alert information include:

- Weather Forecasts: A private weather service provides specific forecast information for the Companies' service territories. When forecast weather conditions exceed pre-determined limits (e.g., wind, precipitation, etc.) according to both the private weather service provider and the National Weather Service (NWS), email notifications are communicated throughout the organization.
- Outreach to individual ICs: If specific areas are targeted for potentially significant weather, individual planning calls may be held to discuss staffing, preparedness, communication strategies, and other preparation topics.
- Storm preparation conference calls: Significant weather threats, or those with potential impact to a larger area, may prompt a conference call with Area Command (AC) and all the potentially impacted Incident Commands participating. Various preparedness issues and possibly staging strategies are typically discussed and determined.
- Corporate messages: Messaging throughout the Companies may be engaged in order to raise awareness for potentially significant events where activations of a large portions of the ICS are anticipated. These messages typically put individuals on notice that their participation in ICS activities may be required.

Once a potentially severe weather event is identified, then preparations can take various forms depending upon the scale, timing, and area threatened by the event. Typical actions to be considered in the preparation phase include:

- Continued weather monitoring
- Continued preparation conference calls, discussions, and meetings
- Assess availability of key resources
- Participate in all New York Mutual Aid Group (NYMAG) or other related mutual aid conference calls
- Staging and/or packing of internal resources for possible travel
- Communicating with contractors and determining available resource levels
- Placing contractors on notice, on standby, or staged at specific locations
- Contact motels, restaurants, fuel, and other services, as appropriate, to monitor status
- Contact media and civic authorities (as appropriate)
- Assess need/timing to open or keep open an operating office
- Assess possible staging of repair crews to other Divisions

Pre-storm notifications of Life Sustaining Equipment (LSE) customers is discussed in Section 9.3.3 below.

In addition to the formal System Alert program, Operations may also issue more frequent weather statements and bulletins to provide awareness of potential weather conditions that have the potential to adversely impact the system. The intent of these statements is to provide awareness to ICs that a potentially severe weather situation is possible and that monitoring and advance preparations may be warranted.

The AC maintains communications with various entities prior to potential events to continue to monitor and evaluate potential threats and to make preparations. Calls that are typically held include:

- Internal calls: Internal storm preparations calls with representation from all necessary AC and IC organizations.
- NWS conference calls: AC Staff participates in NWS conference calls that may be scheduled by the NWS-Albany, Binghamton, Buffalo, Burlington and Upton/NYC regions covering the NYSEG and RG&E service territories. These calls are conducted by the NWS in advance of and during major weather events.
- Mutual aid conference calls: The Companies are members of both NYMAG and the Edison Electric Institute (EEI). The Companies work through the NYMAG and other regional mutual aid organizations when acquiring and coordinating the release of mutual aid. Upon request from any member company seeking assistance, AC Staff participates in all NYMAG, New England Mutual Aid Group (NEMAG) and Mid-Atlantic Mutual Aid (MAMA) conference calls in anticipation of, and in response to an event, even if NYSEG/RG&E is not expected to be impacted by the associated event.

The IAP is formalized beginning with event preparation in order to communicate incident objectives throughout the ICS. An IAP is developed for each Operational Period during an event and is written jointly with contributions from the AC, each IC, Command Staff, and General Staff. This effort results in a coordinated IAP that communicates common Incident Objectives and identifies any resource gaps. A large-scale event will span multiple operating periods and will

require an IAP for each operating period. Area Command maintains an IAP template that shall be used.

Incident Objectives provided in the IAP are based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Incident Objectives must be achievable and measurable, yet flexible enough to allow for strategic and tactical alternatives. The Companies staff storm events as necessary to maintain the ICS structure in each area forecast to be impacted by the event. This staffing level is dynamic; staffing levels may not be the same for multiple events. Staffing levels are based upon type of anticipated event, expected magnitude and duration, etc. The ICS is typically activated during preparation, although it is often further expanded during restoration, as is the AC. Field personnel may be secured, assigned, and possibly stated as a part of the preparation phase. Also, Company representatives may be assigned to county emergency management offices and the State Office of Emergency Management (SOEM) bunker in Albany.

Staffing levels and resource needs should also take into consideration the anticipated event duration and magnitude. In general (and when possible), for events that are anticipated to last for more than a few days the following duty rotations are desirable:

- Field personnel schedule: 17 hour on-duty and 7 hour off-duty
- Supporting management schedule: 12 hour on-duty and 12 hour off-duty
- Assignment duration: Rotate and relieve active storm duty personnel every14 days

The Companies identify and arrange for staging areas on an event-by-event basis in order to best meet current needs. Travel time and geographic isolation (e.g., inaccessible roads, etc.) have been concerns in the past when considering static staging areas. The Companies have determined that formalized agreements for specific staging locations do not best support our restoration efforts. Lack of staging sites within our service territory has never been identified as an issue, even during the largest restoration efforts. Given the size of the NYSEG and RG&E service territories it is unlikely that pre-arranged staging sites will be at the most optimum locations to support actual events. The Companies' will reconsider this practice if staging ever appears to be a possible constraint.

For events that involve significant flooding or the threat of flooding cooperation with the local gas department may be recommended. Advanced planning and preparation to insure an orderly deenergizing of facilities is recommended. This can prevent equipment failure that may delay reenergization once flood waters recede. Advanced planning to expedite reenergization may include: strategic location of mobile substations, reinforcement of access points (roads, tie switches, etc.), securing inventory for likely post-event substation needs, etc. Cooperation with the local gas company during the customer reenergization process will help to expedite service restoration. Flood Guidelines and Substation De-Energization proceduresin the EOPs outlines a process for flood situations.

Customer contact and communications may also be initiated as a part of the preparation phase. Pre-event news releases are issued when weather forecasts indicate the potential for severe events, reinforced through social media such as Facebook and Twitter. Outbound calls to Life-Sustaining Equipment (LSE) customers may also be initiated in the preparation phase to alert these customers of potential issues. The LSE outreach process is described in Section 9.

8. RESTORATION

Although each emergency affects Company facilities in a unique way, the Incident Command System (ICS) framework is consistently applied. Restoration is generally a three-step process:

- Activation-make safe-assessment: Initialize the ICS Area Command/Incident Command (AC/IC), commence make-safe activities, and commence damage assessment.
- Repair: Restore circuits through a combination of permanent and temporary system repairs.
- Circuit sweeps-demobilization: Identify and repair any remaining system damage, identify temporary repairs that require additional work to finalize, demobilize resources as they complete work, document final system status.

Activities associated with these steps are described in this section.

8.1 Initial Phase

8.1.1 Activation

The first phase involves notifying emergency personnel that damage to Company facilities has occurred or is likely to occur. The AC/IC activates necessary personnel who report to their assigned emergency work locations. Consistent with the ICS guidelines, the AC/IC is a flexible structure that will expand or contract as appropriate for the scale and severity of the emergency. For example, as shown in Section 3, an isolated Class I event may require that a limited IC be established in one Division. A Class III system emergency will likely require the AC to activate and for several ICs to be active.

8.1.1.1 Event Conference Calls

Conference calls are initiated according to a schedule appropriate for the event for Class II and III events. The purpose of the calls is to discuss status, identify and address issues, and to identify and address resource needs or gaps. The call structure is flexible but will generally include the following items as needed:

- Roll Call
- Operating Period Objectives
- Safety Message
- Weather / Situational Update
- Operations Section Reports
- Public Liaison / Information Officer Reports
- Area Planning report
- Logistics / Support Systems Reports
- Financial Report
- Executive Team Update
- Next Call

Conference calls are initiated at the beginning of the event and continue throughout until the completion, and a record of each call will be maintained.

8.1.1.2 Coordination of Activities

Each IC is responsible for planning and directing restoration activity in their respective area. When the local IC requires additional resources beyond its control then a request will be submitted to the Area Command Planning Section (ACPS) for additional support.

The ACPS will coordinate mutual aid resources between Divisions and with other utilities. Requests for aid and crew transfers between companies will be coordinated by the ACPS after consultation with the affected ICs.

The Command Staff will coordinate local response efforts with the efforts of local authorities and local public works agencies. Local contacts will be made and maintained throughout the emergency to coordinate response efforts and to assure restoration priorities are being satisfied. Media contacts will also be made to monitor public notification of restoration progress and other appropriate information. Contact will be made and maintained with the Department of Public Service (DPS) Staff and, if necessary, the State Office of Emergency Management (SOEM) by the ACPS or Liaison Officer, in conjunction with the ACPS.

8.1.1.3 Communications with Customers, Public Officials, and Media

The Companies stay in regular communication with customers; State, county, and local officials; and the media, as described in Section 9.

8.1.1.4 OMS Management

During events, the Outage Management System (OMS) is used to analyze likely interruption locations, dispatch crews, record restoration information, and produce various outage update reports. Restoration information is automatically shared with customers who call the Customer Relations Centers' interactive voice response (IVR) system.

Various Division and field departments use OMS information to prepare information for public release. Communication with critical customers, media releases, PSC/SEMO Management reporting, etc., all make use of OMS data.

8.1.1.5 Electric Outage Reporting to PSC/SEMO

The Electric Outage Reporting System (EORS) has been developed by DPS Staff to provide New York emergency management officials with an integrated planning tool to communicate electric outage data in a timely and consistent format. Information compiled in the reporting system is used by the SOEM and regional emergency managers in New York State to monitor utility progress and to inform other agencies of response status.

Submission of data is required by all New York utilities whenever SOEM activates the NYS Emergency Operations Center or as requested by the DPS Staff. The two main components of the EORS are:

- Outage Data (Outage Report)
- Crew Assignment Data (Crew Report)

During any type of event, Outage Data and Crew Assignment Data are to be submitted as requested by DPS Staff (usually at 7AM, 11AM, 3PM and 7PM). Templates provided by DPS Staff will be used to report information. Outage data includes a breakdown of customers interrupted by geographic area, along with Estimated Times of Restoration (ETRs). This information is typically provided automatically, periodically during an event through an automatic data file transfer. Crew Assignment Data includes a breakdown of Company and foreign (that is, non-Company) line, tree and service crews utilized for response efforts, by Company operating Division. This EORS information will be transmitted according to the most recent instructions from DPS Staff.

Currently, the preferred reporting method is to attach crew spreadsheets to an email sent to DPS Staff at the designated email addresses.

In addition, the Companies, together with other New York utilities, are participating in an automated process that provides outage information to DPS Staff every 15 minutes on an ongoing basis.

8.1.1.6 Accounting

Costs associated with event response shall be tracked and accounted for as described in the Event Damage Accounting Procedure in the Emergency Operating Procedures (EOPs).

8.1.1.7 General Services

General Services is responsible for the maintenance of vehicles and equipment and supplying stock materials required by the ICS during non-emergency and emergency events. During emergency events General Services operates as part of the Logistics Section.

8.1.2 Preemptive Power Shutdown

Under certain circumstances, the Companies may shut down power to protect the electric system. A procedure to do so is included in the EOPs.

8.1.3 Make Safe

Make safe efforts, involve the classification and clearing of wire downs and other hazards that may occur during storm events.

The make safe process is in conjunction with the ICS/NIMS order of core priorities: Life Safety, Incident Stabilization, and Property Preservation, commonly known as L-I-P.

Specifically, wires down calls will be prioritized based on indication if energized, i.e. actively arching or burning, then resources are dispatched to identify and verify if energized or de-energized, and if energized they are then de-energized or appropriately guarded, until finally repaired.

This effort will be coordinated with local and municipal agencies, to ensure the related activities such as opening roads or reestablishing access to critical life safety facilities are included in the prioritization within the 'make safe' process.

Wire downs are classified as electric trouble (ET) and tracked as ETs within the OMS. The Wires Down Branch Director (WDBD) is also provided with information from other sources regarding device status on the system (e.g., circuit breakers open at a specific substation). The WDBD uses all of these information sources to coordinate and manage wires down response, as described in Section 5. The OMS manages a piece of this information but information from other sources is also incorporated into the wire down management process.

The WDBD manages the assignment and tracking of make safe resources (make safe line crews and wire guards) and tracks the resolution of wire downs from report through to completion. The specific storm roles for make safe line crews and wire guards are provided in Section 5.

8.1.4 Damage Assessment

Damage assessments are an essential component of effective response and restoration. The purpose of a damage assessment is to provide a rapid and reliable method of assessing the nature and extent of damage to the electric delivery system. This assessment will be used to determine if additional resources will be necessary to restore service to customers in a reasonable amount of time. Damage assessments will be conducted as soon as it is safe and practical. The damage assessment storm role function is discussed in Section 5.

The Damage Assessment program will be initiated by the Planning Section Chief (or IC). The Planning Section Chief instructs the Damage Assessment Branch Director (if applicable) regarding how much of the system to assess and the time period in which the analysis is required to be completed.
Each Division strives to maintain the resources necessary to conduct a preliminary damage assessment for the three-phase and impacted circuits as rapidly as is safe and practical during the first daylight opportunity during an event.

In general, completion of a preliminary assessment for three-phase and impacted circuits as rapidly as is safe and practical during the first daylight opportunity during an event is desired in order to capture the most critical information (e.g., broken pole locations, repairs in difficult to access locations, extreme tree conditions, etc.); however, events particular to each emergency will influence that timetable. Depending on conditions, a sampling of the affected area may be utilized to estimate the extent of the damage.

Following a widespread event, the Incident Commander (or Planning Section Chief) may make a determination that a more detailed field damage assessment is necessary. The decision whether to perform a detailed assessment and when to commence it is based on many factors which may include the nature of the event, the time of day, the weather conditions, etc. Depending on the scope and severity of the event, the preliminary damage assessment could be a rough assessment to determine the extent of the damage to the Companies' facilities, to determine what resources will be required to work on the response and restoration activities.

The decision of how many people to use per team will be made by the Damage Assessment Branch Director (or equivalent). Various factors will be taken into account, including: the geography of area to be patrolled, time of year, time of day, current weather conditions, etc. The effectiveness of the patrol can be maximized if done during daylight hours. If additional work crews have already been requested, the completion of the patrol and the analysis of the results should be timed with the arrival of the additional crews. Foot patrols should be avoided, especially during initial assessments.

Information" gathered from all sources, including line crew supervisors, damage assessment surveyors, or other personnel assigned to damage assessment activities, or information gathered from emergency management, law enforcement and customer calls, at various stages of the event, shall be collected and utilized in the determination of facility damage and the number of resources assigned to the response effort.

Damage assessment is conducted and a global restoration time is estimated. Communications with emergency contacts and with the public, as necessary, are instituted.

8.2 Repair Phase

The next phase is to initiate immediate repair efforts and to make longer term plans to manage the restoration process. During this phase, the Companies' ICS organizational structure is formalized, as appropriate to address the specific restoration needs of the event. Work crews receive initial and subsequent assignments. Restoration times are updated as appropriate.

The Operations Section manages response activities while the Planning Section develops the appropriate tactics, analyzes status, and identifies resource needs. Resources (and gaps) are managed through the Logistics Section. During an event, the Logistics Section actively communicates with both the Operations and Planning Sections to determine and supply resources necessary to meet the Incident Objectives stated in the IAP. As the event progresses, additional resources may be requested and deployed due to the dynamic nature of the event and as resource requirements change.

Crew deployments are based upon the type of event, type of damage sustained, and the extent of resulting damage. Restoration priorities are documented in Sections 8.2.2-8.2.4 below. Cases indicating that dangerous conditions exist, such as live primary wires down, fires, or where danger to life is involved shall be given immediate attention, i.e., assigned the highest priority and addressed accordingly. In addition, the priorities identify high priority objectives (e.g., restorations of hospitals, etc) and allow for restoration to the greatest number of customers in the least amount of time.

During restoration, the Operations Section Chief closely monitors repair efforts. Repair priorities and the extent of emergency mobilization are contingent upon the number of affected Divisions and the damage within each Division. As service is restored, the IC, Operations Section Chief, and Planning Section Chief consult to determine when to demobilize outside resources, when to curtail overtime work, and when to declare the end of the emergency. After the emergency has ended, restoration reports are submitted to the Incident Commander, any temporary repairs are made permanent; and repaired facilities are surveyed to check if they are working properly.

8.2.1 Estimated Time of Restoration Establishment and Reporting

The Companies comply with the "Estimated Time of Restoration Guidelines," issued by DPS Staff and effective 9/30/2010, provided as Appendix B.

Initially, ETRs are specified as "assessing" and then followed by global, regional (Division) and local ETRs as more detailed information becomes available. The Companies have EOPs for managing ETRs and for ensuring that accurate estimates are provided at the global, regional, and local levels. The ICS ensures that accurate field assessment and restoration status is communicated and included in the process for establishing ETRs and the global, regional, and local levels.

In order to determine the estimated time of restoration (ETR) for an event with multiple incidents, the number of incidents, the type of incident (pole, primary, service) and the available field and mutual aid crew resources must be known. As this information becomes known and refined over time, the accuracy of ETRs increases.

Communications between the field crews (i.e., Circuit Coordinator and Information Coordinator) and back office outage management personnel has been refined to insure that the most timely

estimates and restoration data is taken into account when establishing and managing ETR data. Refinements to the ETR management process have been made to ensure that this information is available as ETRs are established and that they tie to the automated report described in Section 8.1.1.5.

The Companies in general have adopted a philosophy of providing conservative estimates. In most instances customers appreciate receiving an ETR that the Company will achieve or better. The Companies also understand that the customers make decisions based on the ETRs provided. During the response period for major events, ETRs may have to be adjusted beyond the original global ETRs due to:

- Extent of the damage to the Company transmission or distribution systems.
- Outages to facilities owned and operated by other utilities that supply the NYSEG and RG&E systems.
- Condition and status of roadways used by response crews to access the trouble areas.
- Continuation of inclement weather throughout the response period, resulting in new customer outages.

The procedure used by the Companies to provide ETRs for a Class III event can be broken into and described in three phases, Global, Regional and Local.

Phase I: Global (County) ETR Establishment

- During the initial hours of an event, both the extent of damage and available resources are typically unknown.
- The first priorities in any event are addressing emergency situations, such as wires-down incidents to make conditions safe for the public and emergency responders, and restoring affected transmission facilities impacting significant numbers of customers.
    - No estimate of restoration is made and the Global ETR fields in the OMS are left blank unless information for a specific job is available. As sufficient information becomes available and the weather event subsides, a global ETR is determined for release to the public through news releases and through social media, on the IVR upfront message, and in the PSC EORS outage reports that must be submitted.
- System Operations (ECC) or the Customer Relations Centers (CRC) place an up-front message on the Interactive Voice Response (IVR) system and utilize social media to inform customers impacted by the outages that NYSEG/RG&E is assessing damage to its system, and Regional ETRs will be provided upon completion of this assessment.

Phase II: Regional (Town, Village) ETR Establishment

- The initial Regional ETR is intentionally conservative given the many uncertainties at this stage of an event, and is a global estimate of restoration of all customers.
- The initial Regional ETR is loaded into each incident in OMS that does not have a specific local ETR provided from an on-site repair crew, but is specific to each region.

Phase III: Local (Neighborhood) ETR Management

- Local ETRs are managed and updated when additional information becomes available (e.g., updated resource information).
- Local ETRs for specific jobs are updated as new information is made available from repair crews. (A detailed division work plan is provided by the Planning Section on night shift for the

next operating period and is fine-tuned by the Circuit Coordinator and Information Coordinator as needed.)

The Companies currently update information in OMS, during a response event, to reflect actual field conditions, within the capabilities of the OMS, using customer calls, field crew observations, damage assessment reports, and substation equipment status (circuit breaker & recloser status) from the energy control system. The information is updated in OMS as the information is received from the various sources. ETRs are also updated utilizing the same sources of information.

As described in Section 9, customers also have the ability to access information about their specific incident (including more specific ETRs, to the extent that regional or local ETRs have been developed). This information is available by either calling the respective Company electric emergency number and talking with a CRC representative, or by listening to the prompts and messages in the IVR system. Customers can also access this information on the Companies' web sites and the "Outage Central" web pages.

8.2.2 System Restoration Priorities

The Operations Section shall follow these system restoration priority guidelines taking into consideration the needs of any critical facilities affected. It may be necessary to re-evaluate service restoration priorities as the restoration progresses. Restoration of electric service shall generally proceed according to the following priorities listed in descending order of priority so that cases of immediate danger are handled first and priority is given to restoring the greatest number of customers in the shortest amount of time:

Priority	System Description
1	Cases indicating that dangerous conditions exist such as live primary wires down, fires, or where danger to life is involved, shall be given immediate attention, that is, assigned the highest priority and addressed accordingly.
2	Repairs to the transmission system that are causing customer outages.
3	Repairs to substations: • Bulk power and transmission substations and switching stations • Distribution substations
4	Primary distribution feeders and where practical: • Give priority to those feeders supplying concentrations of critical customers or high priority critical customers (see Section 8.2.3 below). • Restore primary feeders supplying the largest number of customers. • When completing restoration work in a specific area or location, consideration should be given to the complete restoration of customer service including those listed in 5 and 6 below in order to facilitate the total overall restoration process.
5	Secondaries including distribution transformers supplying groups of customers.
6	Individual services.
7	Street lighting circuits. (Note: During lengthy emergencies street lighting in certain areas may be assigned a higher priority for security reasons as requested by local civil authorities.)

8.2.3 Customer Restoration Prioritization

A priority list should be developed by Incident Command to determine the order of importance for restoring critical facilities.

A *suggested* priority for restoring critical facilities is shown in the following priority listing. Local situations in a particular Division or particular emergency may warrant changes in the above priorities and the appropriate Branch Directors/Section Chiefs may change restoration priorities to direct an overall logical and efficient service restoration process, to satisfy specific emergency situations, and in consultation with local and regional authorities.

Priority	Critical Facilities Description
1	• Life Sustaining Equipment • Hospital/Nursing Home/Clinic • Fire Department • Police Department • Water Supply • Telephone Company Switching Centers • Radio/TV Stations • Electrified Mass Transit • Shelter Locations • Communications Towers
2	• High-rise Buildings • Industrial • Sewage Disposal • Prisons • Military Installations • Aircraft Radio Beacons • Airports • Fire Alarm Devices
3	• Pipeline Pumping Station • Livestock Housing • Greenhouses • Schools

8.2.4 Equipment Restoration Prioritization

Electric system equipment restoration is prioritized as:

Priority	Equipment Description
1	• Power transmission equipment necessary to carry the system loads that are immediate or based on the short-term forecast ◊ Restoration of this equipment is required in order to prevent the need to shed load, which would put additional customers out of service ◊ The appropriate Branch Directors/Section Chiefs will make this determination • Transmission and subtransmission circuits that are locked out

Priority	Equipment Description
	• Substations that serve customers in the first priority category
2	• Distribution circuits that are locked out • Distribution circuits with large sections out-of-service that will be restored based on: ◊ Presence of customers in the first or second priority categories ◊ Number of customers served by the section
3	• Based on customer priority categories: ◊ Three-phase main line of the distribution circuit ◊ Three-phase side taps ◊ Single-phase side taps ◊ Individual transformers ◊ Individual services
4	• Individual services that are off • Flickering and partial lights • Limbs on wires, lights on • Low wires • All others that remain

8.3 Final Phase

The final phase commences when the Company has restored 90 percent of customers but is still identifying remaining customers without service and addressing individual customer special concerns or problems.

In the final phase of an event, circuit sweeps are generally performed on transmission and distribution circuits damaged during an event, following the restoration of electric service to customers. Any temporary repairs that require a permanent repair are noted and addressed by the Division during normal operations.

Demobilization of external resources is started, circuit sweeps are completed, and the public is informed that restoration is complete. Demobilization is planned to de-activate resources as they complete their particular storm role in restoration. This is done in coordination with the NYMAG/NEMAG agreements.

9. CUSTOMERS, PUBLIC OFFICIALS, AND MEDIA

Establishing communications with customers is an important part of the *Plan*. Customers will be provided information regarding outage details, including areas affected, and a schedule for expected service restoration. Such contact is generally initiated by customers who call to report trouble or an electric service interruption. In addition, detailed event damage information is obtained when telephone contact with customers is established promptly and effectively. The Companies also maintain a database of, and reach out to, critical customers and facilities. This section outlines general procedures for establishing and maintaining contact with customers during events.

This section also describes the Companies' use of its website and social media, and communications with elected and municipal officials and the media.

For purposes of this *Plan*, a critical customer is an LSE, medical, or special needs (elderly, blind, or disabled) customer. A critical facility is given a restoration priority based on the *Plan*, as outlined in Section 8.2.3.

9.1 Customer Relations Center (CRC)

NYSEG and RG&E manage the volume of emergency calls through the use of technology including the use of Virtualization software linking the two call centers. The software links the Integrated Voice Response (IVR) Systems and trained representatives to allow a higher call volume to be managed. In addition, Virtual Hold software may be used to offer a customer callback during higher wait times. These technologies can be used as needed and appropriate throughout an emergency event.

The NYSEG and RG&E IVRs interface with the SAP Outage Management System (OMS) to provide timely information to customers. Customers may be identified automatically by the incoming phone number if associated with a SAP account. Alternatively, customers may enter an account number to also use the automated system. On a day to day basis and during emergency events, customer representatives routinely verify phone numbers that should be associated with an account when customers call to allow the majority of customers to utilize the automated service.

At NYSEG, once customers are identified by their incoming phone number, a global and/or division specific message may be heard. These messages can be updated in real time by CRC management using information provided by Corporate Communications and/or Operations. At RG&E, customers may hear a global message which may also be updated in real time similar to NYSEG. Examples of types of messages include information on global estimated restoration times, county specific information and/or dry ice/bottled water and shelter information, etc.

Customers with a life threatening condition are routed directly to a representative.

Customers with an outage situation may enter an automated outage ticket, hear information about whether the outage is being assessed by crews or be provided an estimated restoration time. Customers may also report additional conditions such as limbs on wires, partial power, flickering lights, etc by requesting a representative.

9.1.1 Goals

The NYSEG and RG&E CRCs strive to exceed the Storm Metrics recommendations of 90% of the calls answered within 90 seconds. Daily service level is measured using this standard as well as the regulatory targets for customer service of >=63% in 30 seconds (NYSEG) and >=77% (RG&E) in 30 seconds.

Staffing levels are determined based on size, expected duration and location of the event. CRC staffing can be supplemented with representatives from our off-phone (back office) groups as well as representatives from the other operating company (OpCo) using our Virtual Call Center technology which links the two call centers. CRC managers or their designees determine required staffing levels and work with the other OpCo as needed to supplement staff. Staffing levels are adjusted throughout the event based on need.

As mentioned above, text to speech messaging can be used at both OpCos to communicate global messages to customers regarding assessments, global restoration times, dry ice/bottled water and shelter locations or other information that may be helpful to the customers. These messages are developed and can be changed in real time by the CRCs working with Corporate Communications and Operations.

To assist customers who call the call center, customer representatives are provided with news releases and other information obtained through Corporate Communications and/or Operations regarding the event. In addition, representatives receive information about services that are available such as dry ice and bottled water as well as information that is being provided to the customers via the website, twitter and outbound dialing campaigns. Information is posted on Centerline News/FAQ Lotus Notes Electronic Bulletin Boards available to representatives and other customer service staff.

NYSEG and RG&E IVR telephone equipment and all other systems are monitored by Information Technology (IT) to ensure strong performance. In addition, both CRCs monitor the Avaya Aura software to continually assess call volume levels to ensure staffing levels and to detect any possible concerns with the system. IT staff is available 24 x 7 through any event to ensure immediate response to any telephony or system issues.

9.2 Website and Social Media

The Companies' web application, "Outage Central", can be accessed via computer, tablet or mobile phone with web access. Users of these technologies can enter outage notifications and receive information on estimated restoration times as well as view news releases, dry ice and bottled water locations, shelter locations for people and pets, etc. Use of the website is promoted via news releases during outage events and via messaging in the IVR. Information regarding the Outage Central website has also been provided to customers via the bill insert, Energylines.

On a daily basis quick links to outage reporting and information are provided on the home page and can be accessed several ways. During major outages a special "storm page" is loaded as the home page for the NYSEG and RG&E websites to alert customers to additional information that is available via the website.

Customer representatives receive training on "Outage Central" and as appropriate may indicate to customers that this is an additional resource they may use for information. Representatives also have access to all news releases and any additional information on a specific event which may include information on items that can be found via the website.

The Companies monitor social media and have increased the use of Twitter to build a network of "followers" to extend the reach of messaging. Twitter will be used, as necessary, during major storms to provide:

- links to all storm news releases
- 800# to report outages
- safety information
- dry ice/water distribution information
- restoration progress
- ETRs
- contact information
- retweets from elected officials, emergency operations centers and the media

The Companies monitor Twitter for any mentions of the Companies to identify customer concerns and needs. Trends are communicated to our outreach team, who then use the information to adjust or modify news release content and/or other information to help enhance customer communications. Individual customer inquiries are handled as appropriate, with more critical inquiries such as medical conditions, wires down, or other circumstances that needed special attention sent to customer service team follow-up.

Use of additional social media and communication channels is a developing area and new tools will continue to be assessed and added in the future.

9.3 Contacting Life Sustaining Equipment (LSE) Customers

9.3.1 Background

The Companies shall make every reasonable effort to provide emergency assistance to LSE customers in the event of loss of electric service.

The PSC also recognizes that the ultimate responsibility for providing uninterrupted sources of power rests with the persons originally procuring life sustaining or health support apparatus. These simplified procedures do not change that ultimate responsibility.

The objectives of the program remain the same:

- Locate all persons dependent on life sustaining equipment requiring electric service
- Label the customer account within 3 days of written verification of life support equipment in the home
- Place a Medical Seal on the meter to prevent unwarranted disconnection
- Conduct an annual review of residential LSE customer list
- Continue the emphasis on customer responsibility
- Implement interruption procedures

9.3.2 Definitions: Life Sustaining

Medical equipment that mechanically sustains, restores or supplants a vital bodily function (dialysis machine, ventilator, suction machine, or feeding pump. (This includes multiple dwelling accounts that are in the landlord's name, who has a tenant with this type of medical equipment.)

Unplanned failure of equipment due to an electrical outage would result in a predictable and immediate threat to the patient.

9.3.3 LSE Customer Protocols

LSE customer protocols are as follows:

- Prestorm calls
- Prolonged outage
- Field follow up
- Restoration Confirmation

9.3.3.1 Pre-storm calls

At the request of Area Command, outbound "Pre-storm" calls will be made to LSE customers deemed to be in the path of the storm. The purpose of the call will be to advise the customer of the potential for a storm related outage and to encourage the customer to closely monitor their local weather forecast. Conservative estimates are made regarding divisions to be impacted. The Companies will continue to use our LSE contact procedures and will take a proactive approach in determining which areas to target for pre-storm notifications.

When, an unexpected weather event arises, the Director of Customer Service proactively contacts the appropriate business area so storm procedures can be quickly initiated. Internal email updates are sent on a 24 x 7 basis by an Operations designee allowing decisions on campaigns, staffing, and other needs to be made in a timely manner.

9.3.3.2 Prolonged Outage

Once an outage is deemed to be a Class II or III emergency, the on-call Customer Advocate will be notified by his/her management designee. The Advocate will retrieve a listing of all LSE customers impacted via an SAP transaction. This report will highlight any incidents of an outage, voltage problem, flicker, or partial power, which involves an LSE customer.

The Customer Advocate on call is responsible for addressing the concerns of life support and special needs customers during a prolonged interruption. The Customer Advocate will oversee attempts to telephone each affected life support customer as soon as possible at the onset of a prolonged, unplanned power interruption. This contact will serve to assess the customer's situation and to provide guidance, and assistance as needed. The Customer Advocate (or designee) will maintain contact on a daily basis.

9.3.3.3 Field Follow up

In the event the Companies have not been able to reach the LSE customer (or their designee) via phone call, the company will complete a follow-up field visit to assess the customers situation. In the event that the Companies engage outside agencies in the future, the process will include follow-up with those agencies to verify results.

9.3.3.4 Restoration Confirmation

After the emergency has ended, the Companies' will attempt to contact each affected LSE customer to confirm power has been restored.

9.3.4 Program Maintenance: Update LSE Listing

A weekly report identifying all LSE customers by Division is generated by internal staff and is available at any time.

When the Companies are initially advised of life support in the home, an initial survey letter is sent to the customer. Once confirmation of life support equipment is received, a letter is sent to the customer establishing participation in the program, reiterating the customer's responsibility, and providing an unlisted phone number.

A review of all LSE customers' lists is completed annually, checking for accuracy. Field checks to assure removal or replacement of seal (i.e. next regular meter reading cycle) are performed when needed.

9.4 Contacting Special Needs Customers

9.4.1 Definition: Special Needs

Special needs customers are defined as those specifically coded as elderly, blind, or disabled (EBD) and/or those who have a Medical Hardship indicator on their account.

9.4.2 Event Procedures for Special Needs Customers

During a prolonged outage, the Customer Advocate Supervisor (or designee) will run a report identifying all special needs customers in the affected areas and will arrange outbound call attempts to these customers. The purpose of the call will be to provide details to the customer on the expected duration of the event, details about shelter, bottled water, and dry ice locations if applicable.

9.5 Contacting Critical Facilities

9.5.1 Definition: Critical Facilities

Critical facilities are those that use electrical equipment that supports public health and safety. Examples of critical facilities include, but are not limited to:

- Medical facilities that house patients on a 24 hour basis such as hospitals and nursing homes.
- Other critical healthcare facilities
- Domestic water pumping facilities
- Waste water treatment facilities
- Critical utility infrastructure
- Police and fire protection
- Other critical municipal facilities
- Public radio stations

9.6.2 Event Protocol for Critical Facilities

Once it is determined that the emergency is a Class II event, outreach to critical facilities is initiated.

When contact with a critical facility is made, the Companies:

- Confirm customer contact information to ensure we have accurate contact information for the duration of the event.
- Provide a Company contact name and phone number should the customer have additional questions or need assistance.
- Advise the customer of the ETR.
- Determine if the customer is operating on a generator.
- Inquire about any special issues or concerns the customer has and forwards these on to the Operations Section.
- Log the customer contact.

Critical facilities will be contacted regularly throughout the event to provide updated ETR information and address any issues the customer may have.

The Companies provide critical facility outage information to the Department of Public Service (DPS) Staff as requested.

9.6 Providing Dry Ice and/or Bottled Water to Customers

If service interruptions are expected to last more than 48 hours, the IC will initiate a Dry Ice and/or Bottled Water Program. The Companies have identified dry ice suppliers who can be contacted to meet our supply needs. A tool is available to the dry ice unit that lists suppliers by area code for use in events.

The Companies are working with local and regional authorities to assess distribution of dry ice and bottled water by a third party at the expense of the utility.

Under the direction of the Logistics Section Chief, a Dry Ice/Bottled Water Program Branch Director follows the general procedure given below:

- Obtain estimates of the number of customers who will be without electricity when dry ice and/or bottled water is distributed
- Based on the locations of customers without service, select the location of Distribution Centers
- Assign personnel and arrange for vehicles to distribute dry ice and/or bottled water at each Distribution Center
- Consult with the Public Information Officer to arrange for publicity about the program
- Provide the IC with the locations of Distribution Centers and distribution times
- Provide information to customers regarding the safe handling of dry ice
- Monitor status of outage to estimate dry ice and/or bottled water procurement and distribution

- Information regarding the location and operating hours of Distribution Centers will be available in news releases, the Outage Central web page, on the IVR upfront recordings and with CRC representatives taking customer calls.
- Provide dry ice/bottled water information to the PSC Call Center through daily email updates.

9.7 Public Officials and Media Contact

Much of the response work during an emergency requires collaboration with emergency management offices, local governments, local law enforcement and fire services. Critical elements of the Companies' outreach and communications protocols are targeted at providing these entities with a convenient and reliable mechanism for receiving and providing information during the response process. The Companies also maintain communications with the media throughout a major event.

The local Public Liaison Officer and Public Information Officer are responsible for establishing and maintaining communications with public officials and media in the affected areas during an event. Public officials and media contacts are given contact numbers to reach the local Public Liaison Officer and Public Information Officer directly. Individuals have been identified to serve in the roles of local (municipal) and county liaisons.

9.7.1 Public Official Contact

Key public officials will be contacted by the local Public Liaison Officer or his/her designee as soon as possible after the Incident Commander determines that a power interruption will extend 48 hours or more. As necessary and appropriate, contacts may include:

- State Senators and Assemblymembers
- County Executives
- Town Supervisors
- City/Village Mayors
- Chairs of County Boards of Legislators/Supervisors
- State Emergency Management Office
- County Emergency Management Directors

Regular updates on the status of the response efforts will be provided, and the local Public Liaison Officer will work with the Incident Commander to address specific requests and inquiries.

Company representatives in the county Emergency Operations Centers (EOCs) are responsible for facilitating requests from local government for line crew and/or clearing resources with the appropriate operating division.

The Companies conduct regularly scheduled municipal officials' calls during events. The purpose of these calls is to inform local, county and state officials of restoration status and other key information. As specified in Appendix H, depending on the severity of the event and the estimated duration of the event, the Companies may conduct conference calls daily with local municipal and emergency management officials in areas that are severely impacted. These conference calls are monitored by DPS Staff.

9.7.2 Media Contacts

Establishing effective communications with radio stations, television stations, and newspapers is crucial to response efforts. Every effort is made to provide media contacts with accurate, detailed information. Communications concerning restoration of service will be handled by a Company spokesperson at the Company office most affected by the event. These functions are the responsibility of the local Public Information Officer working in conjunction with the Area Command Public Information Officer, as appropriate.

News releases will be distributed as necessary, typically two to four times a day. In addition, media inquiries will be handled as received and proactive calls will be made, as warranted. All contacts with the media will be documented using the Media Contact Log sheet.

During emergencies, appropriate information is provided to the media. This information may include:

- Safety precautions pertaining to downed wires and other damaged electric facilities
- Contact numbers to report outages and downed wires
- Estimated restoration times
- A statement instructing customers to disconnect motors if lights are dim
- A statement explaining that service is being restored systematically, following a priority restoration procedure
- The number of crews working and the length of crew shifts
- The names of any other utilities that are providing assistance
- Lists of areas where progress is being made and where service has been restored, and what special difficulties are being faced
- Information about the dry ice and/or bottled water distribution sites and emergency shelter locations
- Information about frozen pipes and dangers of hypothermia
- Dangers of using natural gas and propane ranges as space heaters (carbon monoxide poisoning)
- Safeguards and protections when using portable electric generators
- Information about what service entrance wiring the customer is responsible for repairing
- A statement announcing when final clean-up has begun and requesting that those still without service to call
- A statement thanking customers for their patience and support during the event
- What to do in the event of flooding

10. AFTER AN EMERGENCY

Once restoration has been completed, each affected Division conducts a post-emergency assessment. For a Class I or II event, this may be done on an informal basis; for a Class III event, a formal assessment should be conducted and documented. The purpose of the assessment is to discuss activities and to identify areas for possible improvement. The following questions shall be addressed as a part of each assessment:

- What went well?
- What didn't go well?
- What wasn't done that should have been done?
- What was done that shouldn't have been done?

Based upon the results, policies or procedures may be revised in order to improve performance during future events. This section summarizes the post-emergency assessment and plan review and assessment policies.

Within sixty (60) days following complete service restoration, Management evaluates the Companies' response to the emergency by reviewing work crews' efforts, any noteworthy customer reactions or comments, and any unusual expenses incurred during the response process. The Companies' management will determine the effectiveness of procedures and gauge the need for revisions to the *Plan*, Division Annex, ICS Positions Guide (IPG), or Emergency Operations Procedures (EOPs), as a result of the post-emergency assessment.

Within sixty days following completion of service restoration for any event lasting longer than 72 hours, the Companies' shall submit to the Public Service Commission (PSC) a review of the Companies' performance, in compliance with 16 NYCRR §105.4(c). The following is the minimum information to be contained in this review:

- Estimate of customers interrupted during the event including a day-by-day listing of number of customers restored.
- Damage details regarding: transmission lines, substations, primary and secondary conductors, services, distribution circuits locked out, poles broken or replaced, and transformers damaged or replaced.
- People and equipment required to restore service: line crews (identifying internal and external crews separately), tree crews, and support personnel.
- Lists of requests made for outside assistance.
- Lists of contacts with media and municipal and State governments.
- Discussion of any appropriate changes to the *Plan*.
- Self-assessment results.
- Any other relevant information that may be of significance to the public.

In collaboration with Department of Public Service (DPS) Staff and the other New York utilities the guideline for writing self-assessment reports has been revised. This revised methodology was used by the Companies for the July 26, 2012 tornado event, and for Hurricane Sandy. Use of this self-assessment process has been formalized and is part of our after-event review process.

Appendix A

Public Service Commission Regulations Regarding Electric Utility Storm Plans

Part 105. ELECTRIC UTILITY EMERGENCY PLANS

(Statutory authority: Public Service Law, §66[21])

Historical Note

Part (§§105.1-105.5) filed 11/8/82; repealed, new (§§105.1-105.6) filed 7/31/92 eff. 10/3/92.

§ 105.1 Preamble.

Historical Note

These electric utility emergency plans are primarily intended to ensure adequate utility response for storm and storm-like emergencies; however, some aspects of the plans will have application to virtually all electric emergencies (*e.g.*, customer contacts, communication with the media and government officials) and should be used accordingly.

Historical Note

Sec. filed Nov. 8, 1982; repealed, new filed July 31, 1992 eff. Oct. 3, 1992.

§ 105.2 Definitions.

Historical Note

For the purposes of this Part, the following definition shall apply:

(a) Storm drill. A *storm drill* is a training exercise held by an electric utility to test the adequacy and effectiveness of its regularly assigned personnel and personnel performing job functions outside of their normal areas of responsibility in implementing the utility's service restoration procedures in the wake of a storm classified at the highest or next highest level of severity by the utility. Drills shall simulate the involvement of a majority of a utility's customers served by overhead transmission and distribution facilities or individual operating areas on a sequential basis. The purposes of the drill can be achieved through the mobilization of utility personnel with specific storm response, service restoration assignments under simulated storm conditions or through the actual preparation for an advancing storm, * which may or may not damage the overhead T&D system. However, in either case, to qualify as a drill, the participants must have carried out all of their storm response assignments under either an impending storm scenario or a simulated storm scenario. Also the drill must involve contacts with outside agencies, local governments and others who would normally be included in service restoration responses. For actual preparations, in lieu of a drill, the company shall certify in section 105.3 of this Part that all requirements of this definition were met.

FOOTNOTE * Classified by the utility at the highest or next highest level of severity.

Historical Note

Sec. filed Nov. 8, 1982; amd. filed: Oct. 13, 1983; repealed, new filed July 31, 1992 eff. Oct. 3, 1992.

§ 105.3 Submission of electric emergency plans.

Historical Note

Each electric corporation shall file with the commission an electric emergency plan* that addresses storms as well as other causes of electrical emergencies with storm-like characteristics and that complies with the requirements of section 105.4 of this Part. On or before April 1st of each year of on such other date as the commission may prescribe, each electric corporation shall file such amendments to its emergency plan as it deems necessary, or as the commission may require, to maintain a high level of preparedness, or a statement that no amendments are contemplated. In any event, by April 1st of each year, each electric corporation shall certify in a report to the commission that within the past 12 months it has taken the following actions: (a) periodically verified telephone

contacts with and updated its lists of names of internal and external contact persons identified in section 105.4(b)(5) of this Part; and (b) conducted at least one storm drill or emergency exercise involving key company personnel assigned service restoration responsibilities. Submissions made under this section shall include two copies of all documents and be sent to the Director of the Power Division. Each electric corporation shall make available for public inspection its currently effective system-wide electric emergency plan at its principal corporate headquarters. Those corporations that have developed customized plans for individual operating areas shall make a currently effective customized plan available for public inspection at the principal offices of each operating area.
FOOTNOTE * Any corporation that has regional or Division plans shall make amendments to such operating area plans as are necessary to have those plans conform with any system-wide plan. However, a corporation that has a corporate plan that meets the requirements of this Part and provides the framework for regional plans may elect to file only the corporate plan with the commission, provided it certify that the regional plans have been updated to comply with the corporate plan and that the requirements of section 105.3(a) and (b) of this Part have been met for each of the regional plans.

Historical Note

Sec. filed Nov. 8, 1982; repealed, new filed July 31, 1992 eff. Oct. 3, 1992.

§ 105.4 Content of electric emergency plans.

Historical Note

(a) Each electric corporation's electric emergency plan shall be compiled in a loose-leaf manual to facilitate updating. The manual shall provide a current, detailed description of each corporation's service restoration plan and, to the extent practicable, shall contain the information set forth in subdivision (b) of this section.

(b) Each electric corporation's emergency plan shall include the following information:

(1) Table of contents.

(2) Introduction. A statement of the purpose, policies and objectives of the plan.

(3) Emergency classifications. Specify the criteria or guidelines used for determining the severity of electric emergencies and their classification. The guidelines should include, but need not be limited to, the geographical scope of the emergency, the estimated time required to restore general service, the type of expected damage to the electric, system, *i.e.*, from a storm or other storm-like emergency, and an indication of whether company personnel alone or company and supplementary, non-company personnel will be needed to repair system damage.

(4) Emergency response training program. State the corporation's program to provide emergency response training for those personnel assigned service restoration responsibilities that are different from their normal duties. Identify person(s) responsible for managing and evaluating the effectiveness of the program. Include procedures for conducting a minimum of one annual storm drill simulating a response to either a storm, or other storm-like electric emergency that would be classified at the highest or next highest level of severity. State the extent to which any personnel outside the company may be involved in a storm drill. Include as well, provisions for critiquing the drill procedures and for giving staff a minimum of two weeks' advance notice of a scheduled drill.

(5) Advance planning and preparation. Specify the on-going actions that the corporation expects to take throughout each year to plan and prepare for an electrical emergency. State the corporation's procedures to update at least semiannually its lists of contact persons, with titles, addresses, phone numbers and other pertinent data for the following: (i) all utility personnel assigned service restoration responsibilities; (ii) mutual aid companies and contractors; (iii) all life support and other special needs customers; (iv) human services agencies; (v) print and broadcast media; (vi) operators/managers of motels, restaurants and dormitories, etc.; (vii) state, county and local elected officials, law enforcement officials, and emergency management and response personnel; (ix)

medical facilities; and (x) vendors. At least annually, the corporation shall verify that all of the preceding data are current. At least semiannually, the corporation shall issue updated lists of known changes to its employees that have plan implementation responsibilities. The procedures should include the corporation's plans to stockpile emergency restoration tools and supplies in loose or kit form. State also, provisions for the preparation and distribution of literature or other forms of communication with information on customer storm preparations. Such information should address storm survival without electric power and safety precautions regarding electrical hazards such as downed wires and the use of portable generators.

(6) Emergency anticipation. Identify the preparatory measures corporate management would implement in anticipation of a potential system emergency expected to affect the service territory within hours or days. Identify the criteria under which key personnel with service restoration responsibilities would either be notified of an impending emergency or deployed to assigned areas, and any special precautions that would be taken.

(7) Service restoration procedures. Provide the corporation's procedures for mobilizing its personnel, materials and equipment in order to survey system damage and implement measures to ensure timely, efficient and safe restoration of service to customers in areas damaged by a storm or other storm-like electric emergency. The procedures need to identify restoration priorities to ensure that restoration time is minimized, while ensuring critical facilities' needs are met. Include a listing of the priorities for service restoration among customer groups in these procedures. Identify criteria for determining when centralized versus decentralized control is appropriate. For those severe emergencies when field damage assessments are needed, describe the methods for making, within 24 hours, broadscale 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. Describe how field reports of system damage will be integrated with damage reports or indicators from other sources, such as customer call-ins, in order to make a reasonably accurate assessment of system damage and 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. Provide the procedures for deploying company and mutual aid crews to work assignment areas, monitoring crew activity, reassigning crews as necessary, and releasing crews, under both centralized and decentralized command modes. Describe the methods and means that will be used to communicate with damage survey crews and service restoration crews. Identify the procedures for coordinating company restoration procedures with those of other utilities' restoration efforts and with state and local emergency management and public works agency efforts.

(8) Personnel responsibilities. Provide a narrative and chart of the organization and operational assignments of personnel to be mobilized for each emergency classification identified. State the areas of management and supervisory responsibility and functions to be performed at each emergency classification level. Include the procedures for contacting and managing all personnel assigned duties under the emergency restoration plan at both the corporate and operating Division level.

(9) Customer contacts. Provide the corporation's procedures and facilities for handling the extraordinary volume of customer calls that are normally placed during emergency events. Include a description of the type of messages that may be given to call-in customers regarding projections for service restoration or other pertinent information. State the overall corporate goals for answering customer calls during electric emergencies including, but not limited to, plans for staffing levels, number of positions activated, use of pre-recorded messages, means of providing updated information to customer service representatives, and the means of monitoring calls received and

answered at the utility's office and, to the extent possible, at telephone company switching offices serving the utility's office. State the procedures for contacting within 24 hours, and policies for responding to the needs of, life support customers (those who require electrically operated machinery to sustain basic life functions) during an electrical emergency. State the procedures for contacting other special needs customers such as the elderly, the vision-impaired, the hearing and speech-impaired, the mobility-impaired and human service agencies representing these customers, along with policies for handling inquiries and requests for assistance from them. Describe the corporation's method for estimating dry ice needs during an emergency period projected to last more than 48 hours and arrangements for obtaining and distributing dry ice to designated customer groups. State also the means of making out-of-service customers aware of the availability and the location, dates, hours and amounts of dry ice to be distributed.

(10) Communications. Provide the corporation's procedures and facilities for establishing and maintaining external communications exchanges regarding damage and restoration progress with customers in general, human service agencies, the media, the Department of Public Service, the State Emergency Management Office and other state agencies, county and local governments, emergency response services, and law enforcement agencies, etc. Include the identification of any dedicated phone lines, the designation of any special company representative to act as liaison with government entities, and any special provisions that may be required for dealing with critical facilities. State the corporation's planned frequency of communication updates to the media.

(11) Outside aid. State corporate policy and criteria governing conditions under which requests for service restoration aid from other utilities, contractors, government agencies or others would be made and the procedures to be followed in obtaining outside aid.

(12) Support services. Describe the actions that will be taken, and who will be responsible for implementing them to sustain and support restoration crew activities. These shall include vehicle management; foreign crew accommodations, *e.g.*, housing, food and transportation; and distribution of warehouse supplies, *e.g.*, materials, tools, parts and equipment needed in the restoration process.

(c) Within 60 days following completion of service restoration in an emergency where the restoration period exceeds three days, each electric corporation shall submit to the Secretary of the Public Service Commission a review of all aspects of its preparation and system restoration performance.

(d) Each electric corporation may submit such additional information and plans as it believes necessary or desirable to fulfill the purposes of this Part.

(1) Each electric corporation may delete the names and phone numbers of its employees and outside contact persons from the copies of plans filed with the commission and available for public inspection at its corporate headquarters. Such deleted information shall be subject to inspection by the commission or Department of Public Service employees.

(2) Any electric corporation may request that the commission designate as confidential any information required to be submitted in emergency plans. Confidential information may include, for example, internal security matters. Such requests shall identify the specific information requested to be treated as confidential and shall explain why confidentiality is sought. Unless the commission directs otherwise, such information shall not be included in the plans available for public inspection.

Historical Note

Sec. filed 11/8/82; repealed, new filed 7/31/92 eff. 10/3/92.

§ 105.5 Commission review and approval.

Historical Note. Upon receipt and review of emergency plans or amendments filed by an electric corporation under this Part, the commission may require any such corporation to modify such plans or amendments or otherwise prescribe conditions for approval. Approval will be based on compliance with the requirements of this Part.

Historical Note

Sec. filed Nov. 8, 1982; repealed, new filed July 31, 1992 eff. Oct. 3, 1992.

§ 105.6 Compliance with electric emergency plans.

Historical Note

(a) Each electric corporation shall comply with the guidelines and practices set forth in its effective emergency plans. Each electric corporation shall comply with any additional electric emergency plan requirements that may be imposed by the commission.

(b) Under emergency conditions, an electric corporation may modify its response from that in the filed electric emergency plan to the extent required to restore service in a safe and efficient manner. However, modifications and the circumstances that caused them shall be reported in writing to the secretary of the commission within 60 days from restoration of full service. Minor changes such as telephone numbers, personnel changes, etc., need not be reported, but as soon as practicable should be made to the plans.

Historical Note

Sec. filed July 31, 1992 eff. Oct. 3, 1992

Appendix B

DPS Staff Estimated Time of Restoration Guidelines
December 30, 2010

And

Event Notification Requirements
Appendix B to December 15, 2008
Order Adopting Changes to Electric Safety Standards
Case 04-M-0159 (Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems)

ESTIMATED TIME OF RESTORATION GUIDELINES

The following guidelines provide the Department of Public Service (DPS or the Department) expectations of when information will be available and/or provided in response to storms or storm-like electric emergencies when more than 5,000 customers are interrupted for more than 30 minutes within a Division or more than 20,000 customers are interrupted companywide for more than 30 minutes. The tables shown below have been established to clarify the necessary actions to be taken by the involved utilities within the outage period for the specific event. Utilities procedures and practices that require actions prior to those identified should continue to be used.

The guidelines are necessary to ensure the public and the Department are adequately informed and are considered minimum requirements. During the course of restoration, utilities are to continuously refine estimated restoration times (ETRs) and update customer representatives, Interactive Voice Response (IVR) systems, and web sites in a timely manner (at least every six hours). The utilities shall provide restoration information (outage counts, ETRs, etc.) to media outlets and public officials in affected areas. Additionally, utilities shall issue at least one press release daily for all events with an expected restoration period longer than 48 hours.

ETRs provided should be applicable to at least 90% of the affected customers in the reported level (global, local, etc.).

The start of the restoration period will be considered the point in time when field personnel are able to be dispatched without unacceptable safety risks from continued severe weather conditions and the potential additional damage to the electric system from a storm would be low in proportion to the expected level of damage already sustained. The start of the restoration period may be different for distinct areas where the effect of a storm limits access to facilities (e.g., severe flooding).

Initial notification to the Department should follow the guidelines issued relating to Appendix B of Case 04-M-0159 (EIRS/telephone). Any additional information which is available at this point in time should be included in this notification even though notification may be required prior to the start of restoration. For widespread events, company-wide outage statistics should also be provided as part of the initial notification.

Notification to DPS Staff should be made by email to the following addresses:

Activation of the Department's Electric Outage Reporting System (EORS) will be administered separately from these guidelines. Reporting under EORS is required at 7:00 AM, 11:00 AM, 3:00 PM, and 7:00 PM unless otherwise specified. EORS submissions and transmittal emails should contain known estimated restoration times and may qualify as a notification to DPS Staff (provided they contain the required information within the appropriate timeframe). Utilities, however, may need to make notifications to DPS staff in addition to EORS submissions early in an event to satisfy the guidelines.

EVENT EXPECTED TO LAST 48 HOURS OR LESS

Within the first 6 hours of the restoration period

- Notify DPS Staff of expectation that the event will last less than 48 hours. The notification to DPS Staff will state what the Company has defined as the start of the restoration period. For events expected to last less than 24 hours, notification may be via EIRS.
- Provide available information to the public via customer representatives, IVR systems, and web sites.
- In certain situations (e.g., nighttime event), only limited information may be available within the initial six hour window. In these situations, the expectation is that the companies will inform Staff of the delay in determining the initial outage duration within six hours and the notification will occur in an expedited manner as information becomes known. Following a nighttime storm, the determination of whether the restoration period will be less than 48 hours (or less) will be communicated as soon as possible, but no later than noon the following day. Any delay in establishing the initial storm expectations will not affect the time requirements below.

Within the first 12 hours of the restoration period

- Provide DPS Staff with a global ETR and any available regional ETRs.
- Prepare a statement for the press that includes known ETRs for the next upcoming news cycle and communicate with affected municipal and governmental officials (may or may not be by way of a municipal conference call).

Within the first 18 hours of the restoration period

- Establish ETRs for each locality affected and make them available to the public via customer representatives, IVR systems, and web sites.

Within the first 24 hours of the restoration period

- Consider issuing a press release for the upcoming news cycle based on conditions.

Reporting guidelines during the event

- Provide restoration information updates twice daily to DPS Staff (approx. 7AM and 3PM) if EORS is not activated. Updates should continue until customer outages are below 500, or otherwise directed by Staff.
- If EORS is activated and you are selected for reporting, provide restoration information updates four times daily via EORS.
- Notify DPS Staff when all storm related interruptions have been restored.

EVENT EXPECTED TO LAST GREATER THAN 48 HOURS

Within the first 6 hours of the restoration period
• The utility shall indicate that it will be a multi day event (i.e., greater than 48 hours). Notification shall be made to DPS Staff and will state what the Company has defined as the start of the restoration period. • Provide a public statement indicating the likelihood of extended outages and make this information available via customer representatives, IVR systems, and web sites. • In certain situations (e.g., nighttime event), only limited information may be available within the initial six hour window. In these situations, the expectation is that the companies will inform DPS Staff of the delay in determining the initial outage duration within six hours and the notification will occur in an expedited manner as information becomes known. Following a nighttime storm, the determination of whether the restoration period will be greater than 48 hours will be communicated as soon as possible, but no later than noon the following day. Any delay in establishing the initial storm expectations will <u>not</u> affect the time requirements below.
Within the first 12 hours of the restoration period
• Prepare a press release for issue at the next upcoming news cycle and communicate with affected municipal and governmental officials (may or may not be by way of a municipal conference call).
Within the first 18 hours of the restoration period
• Schedule municipal conference call(s), unless an alternative municipal contact method is more appropriate. The first scheduled municipal conference call itself does not necessarily have to fall within the first 18 hours, but shall be within the first 36 hours.
Within the first 24 hours of the restoration period
• Notify DPS Staff of what areas sustained the most damage to the electric system and ETRs, where known, on a general geographic basis. • Issue a press release(s) for upcoming news cycles with the information described in previous bullet.

EVENT EXPECTED TO LAST GREATER THAN 48 HOURS (continued)

Within the first 36 hours of the restoration period

- For storms with expected restoration periods five days or less, provide DPS Staff a global ETR.
- Establish regional/county ETRs for areas expected to be restored in five days, even if the total restoration period is expected to be over five days.
- Identify any heavily damaged areas where large numbers of customers are expected to remain without service for more than five days.
- The utilities must have completed the first scheduled municipal conference call.
- Make ETR information available to the public via customer representatives, IVR systems, and web sites.

Within the first 48 hours of the restoration period

- For storms with expected restoration periods five days or less, provide DPS Staff with ETRs by municipality.
- Provide DPS Staff with a global ETR (when outages are expected to less than five days, this is required within 36 hours)**.**
- Where available, provide regional/county ETRs for heavily damaged areas where large numbers of customers are expected to remain without service for five or more days.
- Make ETR information available to the public via customer representatives, IVR systems, and web sites.

Beyond the first 48 hours of the restoration period

- For storms with expected restoration periods more than five days provide, estimated restoration times for each locality affected and make the information available via customer representatives, IVR systems, and web sites as they become available.

Reporting guidelines during the event

- Provide restoration information updates four times daily to DPS Staff (7AM, 11 AM, 3PM, and 7 PM), unless directed otherwise. Updates should continue until customer outages are below 500, or otherwise directed by Staff.
- Detailed outage and crewing spreadsheets are not required unless EORS is activated and you are selected for reporting.
- Notify DPS Staff when all storm related interruptions have been restored.

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EVENT NOTIFICATION REQUIREMENTS

ALL NOTIFICATIONS SHALL BE MADE WITHIN ONE HOUR OF AN INCIDENT OR EVENT UNLESS OTHERWISE SPECIFIED

I. System Control - Reports of Impending Emergencies, Emergencies, and Load Curtailment

A. Requests for curtailed electric use, voltage reductions, and load shedding initiated to maintain the adequacy of the electric system and significant bulk supply outages or accidents of consequence are to be reported to the Office of Electric, Gas and Water. The specific items to be brought to the Office's attention are as follows:

1. Any decision to issue a request for customer reduction in use of electricity. The Office of Electric, Gas and Water is to be notified at the time of decision to issue any such request.

2. Any action to maintain the adequacy of the bulk electric system by reducing firm customer loads by voltage reductions, manual switching, operation of automatic load shedding devices, or any other means. The Office of Electric, Gas and Water is to be notified at the time of decision to take such action.

3. Any bulk supply outage that has, or could have, a significant impact on the utility's electric system or the state-wide system.

B. The following information is to be included in the reports:

1. For Items I.A.1. and I.A.2., the utility shall provide the approximate area(s) affected, the time(s) of the action, the time(s) and/or an estimate of the time(s) of restoration of normal service (or cancellation of a customer request), an estimate of the amount of load reduction expected or load interrupted, and the number of customers affected if load is interrupted.

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2. For Item I.A.3., the utility shall provide a description of the incident and events leading to its occurrence, the time of occurrence, the system(s) affected, and an evaluation of the effect on the system(s).

II. Loss of Electric Service

A. Written reports of electric service interruptions of five minutes or more are required by 16 NYCRR Part 97. Such reports are to be prepared in accordance with the regulations and submitted to the Office of Electric, Gas and Water.

B. Additionally, notice is to be made for each of the following events:

1. Loss of electric service to 5,000 customers or more lasting 30 minutes or more.

2. Any loss of a distribution system network.

C. Notice of these events occurring after business hours shall be made no later than 8:30 a.m. of the next business day, unless they receive significant media attention, in which case notice shall be provided within one hour.

D. The following information should be provided in the notice:

1. The approximate territory affected.

2. The date and time of the incident causing the interruption.

3. The expected duration of the interruption.

4. If restored at the time of the call, the date and time of restoration.

5. The number of customers affected and amount of load involved.

6. A listing of any critical services affected.

7. A description of the incident and its cause.

8. Any follow-up actions planned.

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III. Reports of Personal Injury Accidents

A. Written and telephone notification of electric system personal injury accidents and deaths are required by 16 NYCRR Part 125. This requirement applies to all electric system accidents that result in injury or death to a non-employee and/or inpatient hospitalization or death to an employee or contractor employed by the utility, including accidents that occur at generating plants.

B. All written and telephone reports are to be made in accordance with the regulations and the following requirements and submitted to the Office of Electric, Gas and Water.

1. Reports for accidents, except those involving a fatality or major media attention, occurring after business hours shall be made no later than 8:30 a.m. of the next business day.

2. Written reports shall be made using the Department's standard form and may be submitted via e-mail or fax.

3. Telephone reports should include the following information:

a. The location of the accident.

b. The date and time of the accident.

c. Whether or not the injured party is a utility employee or contractor.

d. A description of the injuries sustained and the status of the injured party.

e. A description of the accident and its cause.

f. The time the utility received notification of the incident.

g. The time the first utility personnel arrived at the scene.

h. The time qualified utility personnel arrived at the scene (i.e., personnel capable of addressing any safety hazard).

i. Whether response operations were affected until utility personnel arrived.

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IV. Report of Shock Incidents and Motor Vehicle Accidents

A. All electric shock incidents that do not involve personal injuries shall also be reported.

B. Electric shock incidents involving animals shall be reported.

C. Motor vehicle accidents involving utility facilities and/or utilities vehicles in which there is a personal injury shall be reported.

D. All reports of these incidents are to be submitted to the Office of Electric, Gas and Water. The Director of the Office of Electric, Gas and Water shall prescribe the manner in which the reports are to be provided.

E. Reports for incidents occurring after business hours shall be made no later than 8:30 a.m. of the next business day.

F. The reports should include the following information:

1. The location of the incident.

2. The date and time of the incident.

3. Whether or not the party who was shocked or injured, as appropriate, is a utility employee or contractor.

4. A description of the condition of the affected party, and, as appropriate, of the injuries sustained.

5. A description of the incident and its cause.

6. The time the utility received notification of the incident.

7. The time the first utility personnel arrived at the scene.

8. The time qualified utility personnel arrived at the scene (i.e., personnel capable of addressing any safety hazard).

9. Whether response operations were affected until utility personnel arrived.

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V. Unusual Events

A. Major Events

Immediate notification is to be made for major events associated with a utility's electric system that will likely result in considerable media attention. Examples of major events include, but are not limited to, load shedding, catastrophic storm emergencies, boiler explosions, or nuclear radiation releases.

Immediate notification is also to be made whenever a utility's corporate emergency command center (e.g., storm center) becomes operational.

B. Media Attention

Incidents involving utility facilities that are likely to receive attention from the news media are to be reported immediately. Examples of such events include, but are not limited to, fires, manhole explosions, equipment damage of $1 million or more, and nuclear plant incidents.

VI. Manner of Notification

Except where otherwise noted above, the Director of the Office of Electric, Gas and Water shall prescribe the manner in which notice to Staff is to be provided.

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Appendix C

List of Emergency Operating Procedures

EOP	Status	Date Final and Approved
General		
General Services	Draft	May 31, 2013
Readiness		
General Training	Draft	June 31, 2013
Specialized Training	Draft	June 31, 2013
Annual Drill	Draft	May 31, 2013
Event Preparation		
Activating Area Command	Draft	May 31, 2013
AC Conference Calls (scheduling, agendas, notes)	Draft	May 31, 2013
ACPS External Contacts	Draft	May 31, 2013
NYMAG	Draft	May 31, 3013
Securing Contractors	Draft	May 31, 2013
Activating Pre-Staging Areas Under Contract	In Development	May 31, 2013
Crew Availability Report	Draft	May 31, 2013
Substation De-Energization -- Flooding	Draft	May 31, 2013
Flood Guidelines – Joint Electric and Gas Facilities	Draft	May 31, 2013
Restoration		
Event Damage Accounting	In Development	Sept. 30, 2013
Finance – Issuing WBS #s	Draft	May 31, 2013
Processing Emergency POs (mutual aid, contractors)	Draft	May 31, 2103
Emergency Travel Notification	In Development	June 31, 2013
EORS Templates	In Development	May 31, 2013
Crew Availability Report	Draft	May 31, 2013
Crew Reports	Draft	May 31, 2013
Crewing Guidelines – MWF Agreement	Draft	May 31, 2013
Damage Assessment	In Development	June 31, 2103
Wire Guard Management	Draft	May 31, 2013
ETR Guidelines	Draft	May 31, 2013
ETR Field Updating	In Development	June 31, 2013
Pole Tracking	In Development	June 31, 2013
Storm Reporting	Draft	June 31, 2013
Customer, Public Official, and Media Contacts		
Customer Bill Inserts	Available	Completed.
Dry Ice Suppliers	Draft	May 31, 2013
Dry Ice Activation/Bottled Water	Draft	May 31, 2013
Generator Safety (brochure)	Draft	May 31, 2013
LSE Letters	In Development	May 31, 2013
Outage Central Web Pages	Draft	June 31, 2013
Website Updating	In Development	June 31, 2013
SOEM Liaison	In Development	May 31, 2013
County EOC Liaison	In Development	May 31, 2013
Communication Kit	In Development	Sept. 30, 2013

EOP	Status	Date Final and Approved
Post-Emergency		
Post-Emergency Review	Draft	May 31, 2013
Post Storm Reporting (PSC)	Draft	May 31, 2013