



Orange & Rockland

Corporate Coastal Storm Plan 2013

A handwritten signature in black ink, appearing to read 'F. W. Peverly', is positioned above a solid horizontal line.

Francis W. Peverly

Vice President - Operations

Corporate Coastal Storm Plan

EXECUTIVE SUMMARY

Orange and Rockland Utilities, Inc. recognizes that an integrated emergency response plan is vital to our mission of safely providing for the energy needs of our customers. When an emergency occurs, response actions are guided by O&R's overriding emergency goal to restore service in a safe and timely manner.

This Corporate Coastal Storm Plan (Plan or CCSP) outlines O&R's philosophy and procedures for managing:

1. Major events or emergencies that extend beyond the breadth and scope of the individual gas and electric emergency response plans designed to structure the Company's response to electric and/or gas service disruptions.
2. Events that have a major impact to the delivery of both natural gas and electric service to O&R's customers in particular, hurricanes and tropical storms, and/or necessitate O&R's mobilization in support of the Consolidated Edison Company of New York (CECONY) Coastal Storm Plan.
3. Events that result in the activation of the Consolidated Edison Inc.'s Corporate Emergency Response Center

The Plan further establishes the structure, processes and protocols for the Company's emergency response and identifies organizations that are directly responsible for that response and critical support services. In addition, it provides a management structure for coordinating and deploying the essential resources necessary for the response.

A copy of this Plan is available to all employees through O&R's Intranet site.

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1. Introduction

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1.1 **POLICY STATEMENT**

Orange and Rockland Utilities, Inc. (ORU) Corporate Coastal Storm Plan (CCSP) of provides a coastal overview that attempts to identify the potential effects of a severe tropical storm and/or hurricane, prepare strategies to mitigate these identified risks, and guides the subsequent corporate response to such an event. This guide focuses on ensuring public and employee safety while maintaining and restoring the integrity of our energy delivery services.

1.2 **SCOPE**

The CCSP provides guidance for the development of strategies to prepare for and respond to the effects of a significant coastal storm that are beyond the scope of the individual emergency response plans established for electric or gas. The CCSP defines the operating and restoration philosophies that guide the Company's actions before, during and subsequent to a significant event. Utilizing these philosophies, the CCSP provides the guidance for implementation of action items contained within the functional guides (FGs) for emergency response organizations. It also includes a Storm Decision Timeline that:

- (1) Prompts timely action and coordination among decision makers.
- (2) Provides a timetable identifying critical actions necessary to prepare for a significant storm.

Utilizing the Incident Command System (ICS), the CCSP details the necessary resources required to initiate preparation measures, develop a response strategy and execute the restoration plan. Each ICS emergency response organization has a functional guide including a checklist of action items designed to assist the organization's leadership decision making in preparation for and response to a significant storm.

The Vice President - Operations will implement the Plan in accordance with Consolidated Edison Incorporated (CEI) Corporate Instruction CI-260-4, Corporate Response to Incidents and Emergencies. A review and update of this emergency procedure by the appropriate organizations will be conducted every three years.

1.3 **ASSUMPTIONS**

- Public and employee safety guide the execution of this plan.
- This plan details guidelines for a Company response and restoration for a hurricane or a significant coastal storm impacting the ORU service territory. It anticipates that extensive damage will be realized throughout the Company's service territory.

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- Some electric generation will be available to the Company's service territory.
- Gas supply will be available to the Company's service territory.
- Essential services will be operated until continued service is threatened by storm and/or system conditions. Systems and/or services may be shut down in a controlled manner when continued operation presents a safety hazard to the public or our employees, or when significant damage to facilities that may adversely impact our restoration effort is imminent.
- Services will be restored up to customer facilities except in cases where damage to the customer's equipment or facility creates a safety hazard that would prohibit such a restoration.
- Some form of telecommunications will be available during the event.
- An employee evacuation and equipment staging plan may be implemented.
- The U.S. Hurricane Center and U.S. National Weather Service will be the authoritative sources for tracking data as the hurricane approaches.

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2. ORGANIZATION

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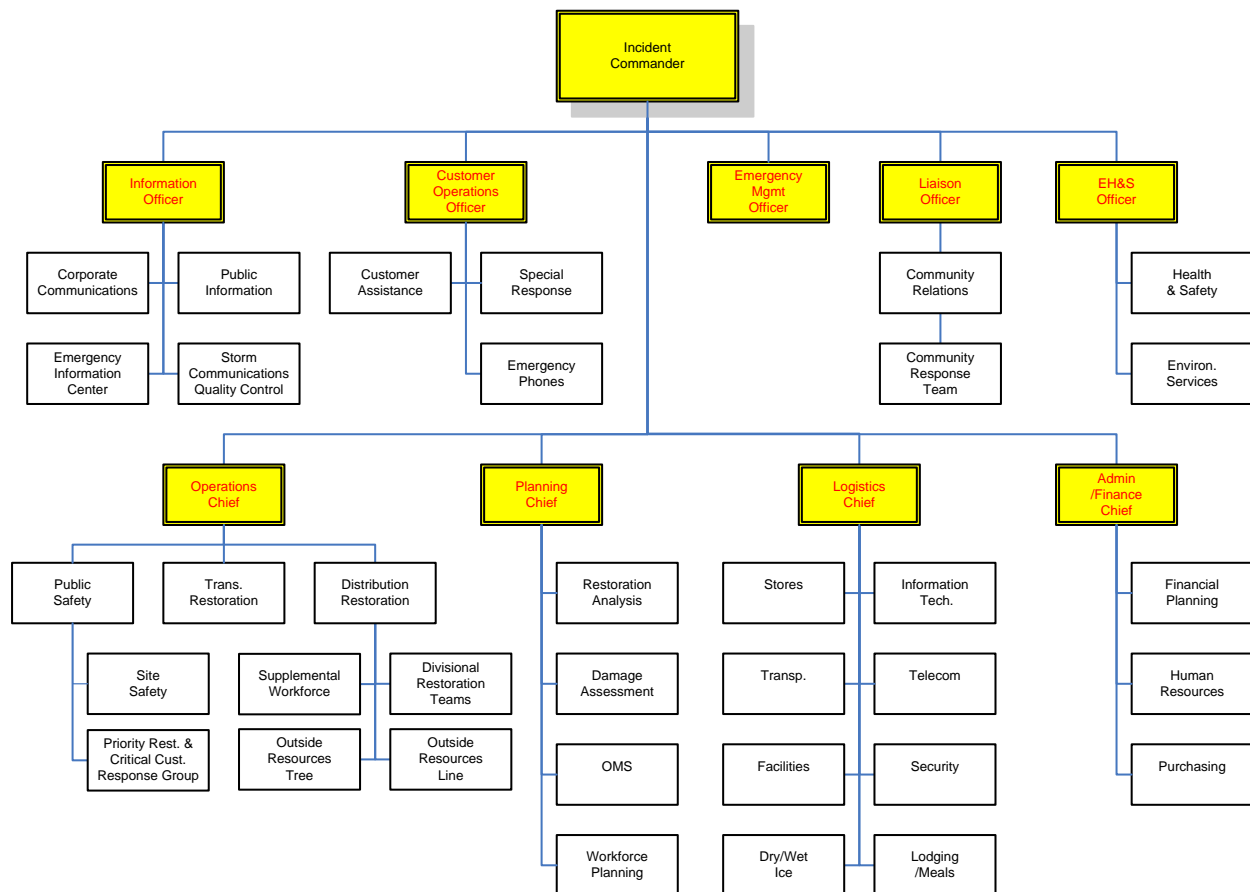
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2.1 INCIDENT COMMAND SYSTEM (ICS)

CI-260-4, Corporate Response to Incidents and Emergencies establishes guidelines for determining the appropriate level of response and mobilizing the appropriate company and external resources in a timely manner in response to any incident. It describes the incident command system (ICS), whose principles are used to manage any incident or emergency, and the ICS organizational structure, including the role of the Incident Commander.

This plan is designed to operate under an ICS organization typically structured as follows:



The ICS organization is designed to operate as a stand-alone response organization. It can also be operated as a functional branch section of the CEI Corporate Emergency Response Center (CERC) ICS organization. The ICS organization is built around five major functions that are

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applied on any incident whether large or small. The ICS affords the ability to fill only those parts of the organization required to respond to the event or incident. ICS establishes lines of supervisory authority and formal reporting relationships. It maintains a reasonable span of control in each section of the operation. The following are descriptions of the functional elements of the command staff and the four sections reporting to the incident commander.

2.2 INCIDENT COMMAND STAFF

The incident command staff consists of the Incident Commander, EH&S Officer, Information Officer, Liaison Officer, Emergency Management, and Customer Operations Officer.

2.3 PLANNING SECTION

The Planning Section is responsible for the collection, evaluation, and referral of jobs; the development and documentation of incident action plans; the accuracy, maintenance and dissemination current information about the status of the restoration efforts; and human resources assigned to the incident response.

The Planning Section meets to formulate and document the Functional coordinator guide. The Functional coordinator guide will be distributed to the General and Command Staff immediately following the meeting. The Plan will be updated and distributed as the situation warrants.

2.4 OPERATIONS SECTION

The Operations Section is responsible for the labor-intensive construction work that is required to repair incident related damage and to restore electric and gas service. Field assessment teams will be used to ascertain the extent of damage to the system. Operations Section directs and performs all field operations required to rectify problems arising from an incident.

2.5 LOGISTICS SECTION

The Logistics Section (as supported by Consolidated Edison Company of New York – CECONY) coordinates the purchase and deployment of material, equipment, supplies, and transportation needs associated with an incident response. Personnel also manage evacuation sites and remote staging areas if established. In addition, the section operates local storerooms, delivery trucking, and garages, coordinates and deploys all aspects of vendor support, arranges for deliveries of wet/dry ice when extended outages are expected and coordinates lodging requirements to support mutual aid crews. The Logistics Section (Facilities personnel) is also responsible for securing designated facilities prior to the storm's impact and then determining the habitability of all company workout locations after storm conditions have subsided. Personnel will interface

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closely with the Planning Section to ensure all logistical requirements of the Functional coordinator guide are addressed

2.6 ADMINISTRATION/FINANCE SECTION

The Administration/Finance Section is responsible for compiling and reporting all costs related to an incident recovery event. The section also provides assistance to other organizations in such areas as mutual aid administration and petty cash disbursements.

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3. Planning/Response

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3.1 PRE-HURRICANE SEASON ACTIONS

Each organization will maintain procedures and perform certain functions related to pre-hurricane season activities. These activities include, but are not limited to:

- Review and update of materials and equipment required before, during, and after a significant coastal storm;
- Review and update of staffing requirements;
- Review and update of staging/evacuation areas;
- Review of after action reviews for the previous year's coastal storms;
- Implementation/documentation of process improvements;
- Review and update mutual assistance agreements/contractor support;
- Review and update, as necessary, CCSP to protect locally-stored equipment/critical supplies from storm surge; and
- Identify and update staging/evacuation areas that will be for the purpose of storing equipment and materials in response to a significant coastal event. Each organization will coordinate with Logistics and other supporting groups, as appropriate, to update this information.

3.2 120 HOURS - STORM MONITORING PHASE

When there is a reasonable probability that a major coastal storm could impact the Company's service territory, Emergency Management will notify the General Manager – Electric Operations, General Manager – Gas Operations and the Director – Control Center and Substation Operations to make necessary preparations.

Emergency Management will coordinate with appropriate organizations to determine the resources required to support the Company's restoration. The decision to utilize mutual aid support and when to initiate the requests will be discussed during this phase with a decision made no later than the 96 hours prior to the event. Emergency Management will provide status updates of resources requests/commitments during all pre-event ICS calls or meeting and will be the single point of contact to acquire mutual aid resources for all aspects of the CCSP. Emergency Management will ensure that accurate information regarding procure mutual assistance personnel is given to Logistics and the Administrative/Finance sections, as necessary.

Upon notification from Emergency Management of the coastal storm's approach each organization will implement pre-storm activities designed to prepare their facilities for the event. These organizations will use the Coastal Storm Decision Timeline included in this plan to guide

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their preparation for the storm. The Coastal Storm Decision Timeline will be reviewed and updated as part of the pre-season preparation.

At this time an Incident Commander will be determined.

3.3 96 HOURS – 4 DAYS FROM LANDFALL

Emergency Management will continue to closely monitor the track of the coastal storm and will begin to work with the necessary organizations within the Company in preparation for the potential coastal storm. Additionally, Emergency Management will communicate with local public safety and Offices of Emergency Management focusing upon the potential of a coastal storm event.

3.4 72 HOURS THROUGH 12 HOURS

When the probability is greater than 10 (ten) percent, that the center of the storm will pass within 75 statute miles of Orange and Rockland within the indicated time period, as determined by the National Hurricane Center of the National Weather Service, the company will mobilize to a predicted storm by following actions outlined in the Storm Decision Timeline in Appendix A. The necessary steps for each organization are identified in the Storm Decision Timeline.

Timely initiation of strategies included in the CCSP are identified in the Coastal Storm Decision Timeline and include; plans for securing facilities and equipment, establishing pre-determined staging and evacuation sites, implementation of Incident Functional coordinator guides, the release of non-essential personnel and securing of personnel to operate the system during the coastal storm. Organizations will provide timely updates of their mobilization status to the Incident Command.

The evacuation of company personnel from a facility will be based on several factors such as the ability of a facility to withstand the predicted wind and storm surge for the category of hurricane expected and to provide a safe haven for personnel within the facility. This would also be based on Orange and Rockland receiving an evacuation order for the region in which our facility is located. The authority having jurisdiction will make the decision to evacuate.

If a facility in which there is operating equipment is located within an area anticipated to be severely impacted by the storm, the decision to shut down or allow continued operation will follow a predetermined plan developed by the operating authority. Current system conditions however may require actions to deviate from the plan. Any such deviation will first be identified to the Incident Commander. The decision to shut down or isolate will be based on remote

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monitoring capabilities, remote operation capabilities, and availability of automatic protection devices.

3.5 12 HOURS - STORM PRE-ARRIVAL PHASE

Planning for storm arrival and maintenance of essential services continues. Post-storm planning begins.

The ORU Distribution Control Center (DCC) will respond to field emergencies while conditions permit without compromising the safety of personnel. The suspension of field activities will depend on the arrival of tropical storm force winds and the time required for the field personnel to reach a safe location. In addition, suspension of field activities in specific geographic areas will be required if floodwaters will block safe egress from the outdoor field locations.

The ORU DCC if operable will continue to monitor the effects of the storm including; wind speed, flood levels, systems, facilities, and:

- Monitor employee safety and accountability
- Address emergencies through remote monitoring and control systems, where available
- Prepare for restoration
- Maintain communication

3.6 3 HOURS - STORM ARRIVAL PHASE

Each organization will operate as set forth in their respective operating philosophy during the coastal storm event. Organizations will continue post-storm planning. Operating organizations will:

- Monitor impact to each commodity
- Prepare to implement damage assessment plans
- Review "Cold Start" procedures

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4. OPERATING PHILOSOPHY

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Energy systems will operate to maintain essential services until continued service is imminently threatened by storm and system conditions. When it is apparent that continued operation will result in significant damage to facilities and equipment and/or potentially compromise the safety of the public or our employees, actions will be taken to remove those facilities from service.

Each operating and non-operating entity will implement plans to support this philosophy.

4.1 **OPERATIONS**

4.1.1 Transmission Restoration

System Operations will implement OI 12 E Conservative Operations for any potential threats (weather, SMD, etc.) to the system. System Operations will implement Primary Op Guide #2 System Voltage – During Normal and Emergency Conditions, Primary Op Guide #4 Response to Abnormal Operating Conditions, OI 2E – Overloads on Transmission Facilities, which outlines actions to be taken in the event of low frequency, equipment overloads, low voltage and other emergencies. Actions may include voltage reduction, use of maximum generation, disconnection of facilities, and load shedding. When distribution stations or load areas have been impacted, OI 1E – Load Relief Measures Voltage Reduction and Load Shedding.

For substation locations expected to be flooded, where remote flood level indicators and Supervisory Control and Data Acquisition (SCADA) are in place and available, the entire station will be shut down via SCADA when critical flood levels have been reached or are imminent. To reduce the amount of time needed to shutdown an entire station that is expected to flood, multiple supply feeders may be removed from service in advance. This would allow the actual station shutdown to take place shortly before the flood conditions occur.

Generally, transmission stations shall not be de-energized on a pre-emptive basis based on wind hazards, but shall be operated in accordance with established procedures based on actual conditions. In those cases where there is inadequate relay protection, those facilities will be removed from service in accordance with OI 14S Relay Maintenance.

Overhead systems shall be operated throughout the storm, unless shutdown occurs as a result of de-energizing a substation supply for the reasons indicated above. System Operations will implement OI 1E – Load Relief Measures Voltage Reduction and Load Shedding. Actions may include voltage reduction, use of maximum generation, disconnection of facilities, and load shedding. Generally, transmission infrastructure shall

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not be de-energized on a pre-emptive basis based on wind hazards, but shall be operated in accordance with established procedures based on actual conditions. In those cases where there is inadequate relay protection, then those facilities will be removed from service in accordance with OI 14S Relay Maintenance

4.1.2 Distribution Restoration

In general the overhead system will be operated through the storm event since it is designed to operate to failure. However, in order to reduce potential risk to the public and surrounding environment and additional damage to equipment, the Company's Operating Philosophy allows for de-energizing certain equipment when the threat due to storm damage is imminent.

If, due to the predicted severity of the coastal storm, planned outages are anticipated the Incident Commander will direct Emergency Management to notify the local Offices of Emergency Management. Additionally, the Information Officer shall be informed of the Company's intent and ensure that the proper public message is communicated.

4.2 GAS OPERATIONS

Certain equipment has been identified at risk due to potential storm conditions. Accordingly, Gas Operations will secure facilities at risk such as gate stations, remote operated valves, district regulators and make adjustments to maximize continuity of service. Securing these facilities will not result in discontinuing service to customers.

Gas Control will monitor all critical system facilities and monitor "Poor Pressure" and "No Gas" complaints to determine areas that are being impacted by flooding. In the event of loss of communications, Gas Control will follow Gas Emergency Operating Procedure (GEOP).

Gas Operations will continue to maintain a field presence and respond to all alarms and emergency calls until weather conditions become hazardous to employees. Gas Control will continue to monitor and track complaints to expedite response, make safe and restoration efforts once conditions allow for crews to be re-dispatched to the field.

4.3 CUSTOMER OPERATIONS

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Pre storm preparation –

In advance of the storm Customer Operations may reach out to all customers, but no less than the LSE, Critical Care (nursing homes and hospitals) and priority customers as part of our normal procedures for major storm events.

Customer Operations has call centers in Spring Valley, NY and Blooming Grove, NY as well as a contingent of CSRs that work remotely from their homes, staffing is split with approximately 50% of the CSRs in Spring Valley, 25% in Blooming Grove and 25% working remotely. Customer Operations will make preliminary staffing assignments (before, during, and post storm) based on the anticipated severity of the event obtained from Emergency Management and other sources. Generally, Customer Operations will have 12 hour shifts with greater staffing during the hours up to about 10 PM. The Call Center has the ability to activate the Twenty First Century Communications ("TFCC") high call volume answering service on a 24/7 basis and route all calls coming into the Company's toll-free number to TFCC in cases of high or anticipated high call volume. The automated call answering service routes the calls to TFCC's Interactive Voice Response ("IVR") platform where customers receive a recorded message with information about the event and have the opportunity to report their outage and receive Estimated Restore Time ("ERT") information for their accounts as such information becomes available. The Call Center can augment staffing when necessary through its internal supplemental workforce as well as through the activation of a contracted third-party vendor. Additionally, if additional live-agent support is needed Customer Operations may request mutual assistance via TFCC's Mutual Assistance Routing System ("MARS") functionality which allows utilities to support each other's call centers with live agent answering during extended outages and emergencies by enabling virtual call center support. This service enables the Company to request the use of call center agents of participating TFCC MARS clients.

4.4 INFORMATION

The Information Section will provide timely and accurate information to the media, elected officials, community organizations, and employees. Pre-storm activities will focus on advising customers of the potential impact of the storm on the company's energy systems, the possible shutdown of selected systems, and an overview of restoration operations. Customers will also be informed of how to contact the company to report power problems and what to do around downed power lines. Post-storm communications will focus on providing accurate restoration information, safety messages, and highlighting the efforts and progress of field crews.

4.4.1 Public Information

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Public Information will follow the procedures detailed in its function's storm plan guide. Accordingly, information shall be prepared by the incident command organization and packaged for marketing to all stakeholders through Public Information. The incident commander, or designee, will be responsible for approving all communications products developed by Public Information.

4.5 ADMINISTRATION/FINANCE

4.5.1 Human Resources (HR)

For significant storms, the appropriate level of human resources required to initiate the system emergency response is determined by each organization's staffing level plan within their functional coordinator guide (FCG). The employees who work in each organization represent the core group who respond to events affecting the electric and gas systems within each organization. Each organization's Functional Coordinator Guide (FCG) identifies a specific staffing level for an emergency response as set forth in the CCSP. HR will assist in assigning emergency assignments to all company employees on an annual basis. During a significant coastal storm, HR will assist functional areas with obtaining personnel and meeting changing staffing requirements. If necessary HR will assist with staffing needs by redirecting surplus resources as necessary. Any required training for these individuals will be identified. To the extent possible, trainers will be available to provide "just in time" training to this supplemental staffing.

4.6 LOGISTICS

The corporate logistic operation will be supported by CECONY Central Field Services (CFS), Purchasing, and Facilities (FS). Representatives from each of these areas will be made available to the Incident Commander throughout the event and provide logistics support for the Company prior to, during and after the storm.

Staging areas as needed may be established to receive, coordinate, manage and deploy mutual assistance responders and their accompanying resources. The Logistics Chief will maintain a report detailing the list of resources available for deployment to each staging area along with the capability of each identified location.

Site-specific business continuity plans for all Company facilities are maintained to address those locations deemed at risk to damage. These plans provide instruction as to what measures need to be employed to safeguard storm riders, materials, supplies, vehicles, equipment, fuel stations, storerooms and garages. For "at risk" workout locations, nearby alternate sites have been

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selected for the safeguarding of vehicles and equipment and sheltering storm riders. Logistics will coordinate this movement with the various operating groups who will load necessary equipment into vehicles and then drive the same to the designated alternate site.

4.6.1 Stores

The Logistics Section will secure a list of materials, equipment, and services required by the operating and supporting organizations in order to promote quick and sustained emergency response. They will develop a strategy of procuring specific items well in advance of the storm and will coordinate with other Company organizations prior to an impending storm to support the respective storm preparation requirements. Each organization's FCG includes lists of resources necessary to effectuate a response to a major storm. The Logistics Section will support the strategies developed by the Planning Section.

During early phases of the storm, FS will secure the targeted sites to make them as safe and storm resistant as reasonably possible. FS will direct the responsible operating departments to remove loose items and equipment in the yards and buildings. FS will work to ensure that vehicles and equipment are properly relocated.

4.6.2 Security

Security will initiate security protocols to protect the assets of the Company without adversely affecting the Company's emergency response operation. Primary tasks include:

- Assist in locking down those facilities which would be evacuated in anticipation of storm damage.
- Ensure facilities still in use have adequate perimeter protection and access control.
- Establish physical perimeter protection and restricted access mechanisms at staging areas.
- Liaison with local, state and federal law enforcement agencies, and
- Provide security services for executive and operational department requests.

4.6.3 Information Resources (IR)

IR will maintain essential business applications and communications services until failure or their continued operations poses a personnel safety risk or adversely impacts the

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ability to restore service. Where possible IR will reinforce and/or stage contingency capabilities prior to the onset of the storm.

4.6.4 Telecommunications

Telecom will procure extra communications equipment (Nextel's, cell phones, blackberries, and satellite phones) to facilitate communications.

4.7 **ENVIRONMENT, HEALTH AND SAFETY (EH&S)**

Corporate EH&S will work closely with the operating groups to ensure their EH&S staff is actively engaged in pre-event planning and implementation. EH&S will work closely with the applicable regulatory agencies to keep them advised and seek their support of any needed emergency relief or regulatory discretion. In coordination with local organizations EH&S will work to support the continued protection of employees and the public while minimizing any adverse impacts on the environment. EH&S will maintain normal services until continued operation poses a safety risk or adversely impacts the ability to respond to post storm recovery/restoration efforts.

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Restoration efforts by field response units will continue as long as safe conditions exist. When winds and/or floodwaters are such that conditions are deemed unsafe to continue working, restoration activities will be suspended pending a return to safe operating conditions. Restoration activities will be coordinated with local agencies.

Once conditions permit, organizations will develop damage assessment plans and perform assessments as per each organization's procedures. Damage assessments will be performed for facilities, infrastructure, proposed staging areas, and temporary workout locations. Assessments will be required prior to energizing regardless of whether equipment was manually de-energized or automatically separated from the system. Each organization will identify necessary resources needed to complete these assessments.

5.1 OPERATIONS

5.1.1 Priority Restoration and Public Safety

Emergency medical and health, public safety, transportation, and utility (communications, electric, gas, water, and wastewater management) services are considered essential to municipal operations. The Company's part is to develop and maintain strategies for potential large-scale restoration of utility services (electric, gas, telecommunications, and water/wastewater) in affected areas following a coastal storm or other large-scale disaster.

5.1.2 Transmission Restoration

Restoration activities will be based on the result of assessments performed by damage assessment teams. In the event of a total system shut down, restoration of the transmission backbone will be restored as a first priority in accordance with the Primary Op Guide #2 System Voltage – During Normal & Emergency Conditions, Primary Op Guide #4 Response to Abnormal Operating Conditions, OI 2E – Overloads on Transmission Facilities. This will include coordination with the Independent System Operators (ISO), independent power producers and neighboring utilities. Additionally, the plan may include some restoration of load to control voltage and facilitate energizing transmission paths. In general and depending on system conditions, customer load will be restored in accordance with the priorities set forth in the company's Manual Load Shedding plan.

For partial shutdowns, and following assessments, Substation and field management personnel will notify System Operation of what stations are serviceable and available for

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re-energizing. Substation Operations will provide final approval for re-energizing a substation. Individual stations will be restored in accordance with individual station engineering start-up specifications. Station assessments should determine what equipment is available for service and should include the status of relays, dielectric, and other critical station equipment. The assessment teams within Electric Operations will report to System Operation what equipment is available for service prior to energizing load areas. These assessments should include the availability of various distribution systems including auto loops, high-tension customer installations and other distribution equipment that would be included in the energizing path.

Distribution Engineering will evaluate equipment availability derived from assessment and where necessary, provide System Operation with an energizing plan for the various distribution systems. Transmission Operations will coordinate their assessments with Substation Operations and will report to System Operation the current status, restoration plan and ultimate availability of those out of service overhead and underground facilities. Where possible, System Operation will utilize SCADA systems to restore equipment. Because of the possibility that available resources may be seriously limited, those systems under the operating jurisdiction of the electric operations regions should not be utilized to pickup customer load until approved by System Operation.

5.1.3 Distribution Restoration

Distribution Engineering will prioritize the restoration of the electric facilities lost or de-energized to establish, maintain or ensure the integrity of the distribution system. The Analysis Group, in conjunction with the Distribution Restoration Group, will establish the actual restoration plans based on the condition of the electric distribution system as determined by SCADA, damage assessment and other relevant information.

To ensure a coordinated restoration response, this information will be provided to the Operations Chief for dissemination to the respective Transmission and Distribution Restoration Groups.

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In general, area outages will be restored based on system conditions in accordance with the Company's load shedding plan. Authorization to restore load shall be obtained from System Operation prior to implementing any restoration operations. The following represents the general sequence for the restoration of the distribution system:

- Transmission feeders
- Substation equipment
- Distribution feeders
- Sensitive customers: These customers include hospitals, water supply and sewage treatment facilities, nursing homes, police and fire stations, telephone company facilities, radio and TV stations, public transportation, etc and will be coordinated through the local OEM.
- All other affected customers

Once the supply system has been returned to normal, feeders and equipment still out of service and customers previously de-energized will be restored based on established priorities based on the Restoration Priority Matrix.

6.1 **OVERHEAD**

Using detailed plans set forth in the ERP, the operating divisions will divide into distinct areas, roughly coinciding with substation load areas. Restoration efforts will be directed out of staging sites established for each of these areas. Staging area sites will be staffed with the required support groups as outlined in the Emergency Response Plan (ERP) for this event level. Initial damage assessment priorities will be established by information gathered from trouble call tickets, SCADA and other relevant sources. Trouble Analysis will assess system conditions based upon the damage assessment, establish a restoration strategy, direct the overall restoration efforts, and provide technical support to the construction forces as the system is rebuilt.

Each operating division will operate as an independent unit to restore service as expeditiously as possible. The Distribution Control Center will oversee all switching operations and coordinate the general restoration effort. The Operations Section Chief will monitor the work done by each of the restoration groups and will redirect resources, as necessary, according to the severity of damage throughout the regions.

6.2 **GAS OPERATIONS**

Gas Operations will follow the Gas Emergency Operating Procedure (GEOP)

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6.3 CUSTOMER OPERATIONS

In general, telephone messages and information to CSRs will indicate the areas and numbers of the outages to the extent available related to the storm and describe the restoration priorities and sequence in close coordination with Information Officer so that customers know what to expect during the restoration process. Customer Operations will ensure adequate staffing to handle call volume.

6.4 HUMAN RESOURCES (HR)

HR will continue to assist operating areas in supplying their supplemental staffing needs. As additional needs are identified, HR will survey non-operating departments to identify additional non-essential personnel that can be reassigned. Any required training for these individuals will be identified. To the extent possible, trainers will be available to provide "just in time" training to this supplemental staffing. HR will also survey operating areas to determine if there is supplemental staffing that could be more efficiently used in other operating areas.

All employees will be assigned to twelve-hour/seven-days-a-week schedules at the beginning of the restoration period. In the case of a lengthy restoration period, HR, with input from operating organizations, will announce any changes to this policy.

HR will continue to provide advice and counsel for any employee-related issues during the restoration period.

The Family Services unit will provide assistance to employees and their families.

HR will continue to assist the Information Section in communicating critical information to employees.

6.5 LOGISTICS

After the storm has passed, the condition of work out locations, vehicles and equipment will be assessed and results reported to the Logistics Chief. In addition, representatives must complete an assessment of proposed staging areas to determine their accessibility. Predicated on the above, a decision will be made to either re-occupy affected facilities, redirect resources to another workout location or to establish a staging area for use by Company forces.

Logistics representatives will work closely with Planning and Operations to determine the need for hotels and/or the construction of staging areas. Potential staging sites have been identified

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for each geographic area. Logistics will provide the necessary supply of materials, supplies, equipment, vendor support, and storeroom and garage services associated with the restoration effort at functioning workout locations.

Where such work out locations are not operational, Logistics will support the construction and operation of staging areas and provide essential services to both company crews and mutual aid personnel such as lodging, food, comfort stations, showers, busing, and fueling vehicles at functioning staging areas.

6.5.1 Information Resources (IR)

IR will reinstate mainframe operations as soon as possible.

IR will monitor the status of business applications and telecommunications services throughout the event and respond as required to outages and disruptions. IR will also coordinate with public communications carriers to assess status of corporate facilities and services that use these networks and coordinate response to disruption of services.

IR will maintain contact with service vendors and contractors to repair any damage to communications infrastructure as soon as possible.

IR will procure and maintain spare parts for communications equipment located in low-lying areas, to expedite restorations.

6.6 **ENVIRONMENT, HEALTH & SAFETY (EH&S)**

EH&S will play an active role in event response through active participation and support via staffing of the Corporate CERC, ERT responders, sampling and analysis SME guidance and regulatory interface. It will continue to work to support the protection of employees and the public while minimizing any adverse impacts on the environment ensure the safety and health and environmental. It will work with local EH&S staff and their operating departments to provide necessary EH&S support for resumption of operations, deployment of recovery staging areas and development of re-habitation plans. It is important that all EH&S personnel remain within that assignment area and operating departments minimize the re- assignment to non-EH&S tasks. It will continue to interface with regulatory agencies to update them on storm event outcomes and specific emergency relief taken or needed.

EH&S return to normal services is dependent on restoration operations. After representatives assess the condition of vehicles and equipment staged at respective evacuation areas and FS

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assess the habitability of workout locations and develop the re-habitation strategy EH&S will initiate restoration tasks.

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7. RECOVERY/DE-MOBILIZATION

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Based upon the specific impact of a coastal storm event, the IC in conjunction with direct reports, will determine the best method to return to normal operations and demobilize the resources secured for storm response.

It is the responsibility of the Planning Chief to ensure that a systematic plan is established and implemented. Personnel and equipment will be demobilized from the incident in accordance with this plan. Resources no longer required for the response to the incident will be demobilized as rapidly as is feasible.

The demobilization plan will have provisions including, but not limited to:

- A plan for support personnel release. In general, the release will occur in the following order:
 - o Outside resources
 - o CECONY resources
 - o Internal resources re-assigned from normal day activities
- Verification of the return of all Company equipment including but not limited to radios, vehicles, materials, supplies, etc.
- Notification to the Logistics Section of the release of crews, so appropriate hotel checkout and staging area or base camp decommissioning can be performed.

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8. Training/Drills & Lessons Learned

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8.1 TRAINING

Just in time training will be provided for storm assignments. A continuous effort will be placed on maintaining the effectiveness of the people, the training, and the logistical preparations for the CCSP. Scheduled drills will exercise pertinent aspects of the Company's emergency recovery preparedness. Training requirements will be established to provide the necessary functional training and annual refresher training that will permit all emergency response participants to be effective in performing their assigned duties.

8.2 DRILLS

Key emergency response plan participants know, understand, and practice the recovery priorities. Public safety is a primary concern for Orange and Rockland.

One facet of an effective restoration plan is a well-trained and well-drilled work force. The CCSP relies upon incumbent employees supplemented by additional personnel from inside and outside the company who can be mobilized during an incident. While response restoration skills may be taught in training classes, the application of this knowledge takes place and is enhanced during realistic drills and exercises.

Effective drills exercise various aspects of preparedness. They may begin with the mobilization of required participants and end with a systematic debriefing of performance after the drill. Two types of drills may be conducted:

Organizational Readiness Drill

This is a "table-top" exercise designed to test the response of the company at the organizational level to address different levels of emergency. The drill may be declared at any time and is driven by scripted scenarios presented to participating organizations. Each scenario declares certain emergency conditions to exist and requires the responsible organization to respond by providing actions it would take if such conditions actually occurred. Scenarios may be changed as the drill progresses to ascertain what actions would be taken by the organization if conditions suddenly changed. ;. Examples of response requirements may include:

- Company personnel to be mobilized,
- Equipment/vehicles to be sent to staging areas,
- Computer/telephone system changes to be activated,
- Vendors/contractors/non-company personnel to be contacted/mobilized.

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Organizational readiness drills are conducted annually using various scenarios that test organizational response and preparedness for different levels of storms. The CCSP may be tested via stand alone drill or in conjunction with the annual Corporate Emergency Response Drill. The Vice President of Emergency Management may waive these drills if, in his/her judgment, previous storm activity during the year precludes the need for these drills.

8.3 SELF ASSESSMENT AND LESSONS LEARNED

Upon declaration that the emergency recovery is over, a post-emergency meeting is scheduled to evaluate the performance during the event. A lesson's learned document will be prepared by Emergency Management in the event the CCSP is utilized to respond to the threat of a significant coastal storm.

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APPENDIX A – Decision Timeline



Decision Timeline

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