

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
Albany on April 18, 2013

COMMISSIONERS PRESENT:

Garry A. Brown, Chairman  
Patricia L. Acampora  
Maureen F. Harris  
James L. Larocca  
Gregg C. Sayre

CASE 13-E-0140 - Proceeding on Motion of the Commission to Consider Utility  
Emergency Performance Metrics.

NOTICE SOLICITING COMMENTS

(Issued April 24, 2013)

This proceeding was instituted to consider the development of a tool for the quantitative assessment of New York State electric utility performance in restoring power to customers after a significant outage.<sup>1</sup> The Notice Soliciting Comments seeks input on a draft Scorecard developed by Staff. The Scorecard provides criteria for the quantitative assessment of electric utility performance in restoring electric power after a significant outage. The areas addressed by the Scorecard are: a) the advance preparation of each utility prior to a significant outage, b) the ability of each company to restore service after a significant outage, and c) each company's communication during a significant outage.

The provision of reliable and dependable energy supply is critical to the health and safety of New Yorkers. In order to fulfill this important obligation, utilities must appropriately respond to emergencies. The Commission has primary responsibility

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<sup>1</sup> A significant outage is defined as an electric power outage event where a customer is out of service for three days or more or that the Commission deems significant on an individual case by case basis.

for assuring that the utilities are adequately prepared to respond to emergency events and that they respond appropriately to the challenge of restoring service promptly and efficiently. Such events also create the need to effectively communicate with the public. This includes handling large volumes of customer calls and providing appropriate information to a variety of parties, including customers, public officials, first responders, critical facilities (*e.g.*, hospitals, nursing homes, water and sewage treatment facilities, etc.), and Department Staff.

The draft Scorecard introduced here represents an effort to establish standards that will promote effective emergency response. Holding utilities accountable to such standards can help assure that they have the ability, capacity, and mindset to act quickly and effectively. While outages events can never be entirely eliminated, these metrics will establish minimum performance levels against which to assess restoration after significant outages.

The Scorecard is being developed in the context of the newly enacted changes to the Public Service Law (PSL). Among its provisions, the PSL requires increased Commission oversight of utility emergency response plans and provides the Commission with the authority to assess civil penalties against utilities. The PSL requires that the Commission review and approve electric emergency response plans filed annually by electric corporations and specifies subject areas to be covered in the emergency response plans. Electric utility emergency plans are being processed for eventual Commission review and approval in separate parallel dockets.

The imposition of administrative penalties in connection with emergency performance will be a complex undertaking involving assessment of utility performance against performance measures in the context of their emergency response plans. The Scorecard has been developed to provide quantitative measures to assist the Commission in its evaluation of utility performance, its determination of whether to assess a penalty, and the magnitude of the penalty to be assessed. In addition to requesting comments on the draft Scorecard, the Notice poses questions to enable the Scorecard to provide an

effective tool for assessing performance by not only the Commission, but utilities in assessing their own performance as well.

Department Staff has developed a scorecard divided into three categories: Preparation, Operational Response, and Communications. All the points in the Scorecard add up to 1,000 points with the Preparation category at 100 points, Operational Response 600 points, and Communications 300 points. The attached documents provide the framework and details on specific criteria as well as definitions and explanation of the process to be followed.

Comments are invited on the attached documents as well as the following questions:

1. Are Scorecard criteria appropriate? Are the scorecard criteria weighted appropriately?
2. Are there other aspects of utility emergency plans which should be assured by Scorecard criteria?
3. Should the Scorecard be assessed only in totality or on an individual category basis?
4. Should imposition of penalties be subject to any exceptions or conditions? If so, what exceptions or conditions ought to apply?
5. For utilities with several distinct divisions should the Scorecard be applied on a Companywide or per division basis?
6. Should the Scorecard be used to determine the applicability of the uniform policy of minimum utility practices that would be applicable as a result of prolonged outages caused by storms and other emergency events being considered in Case 13-M-0061?<sup>2</sup>

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<sup>2</sup> Case 13-M-0061 - In the Matter of Customer Outage Credit Policies and Other Consumer Protection Policies Relating to Prolonged Electric or Natural Gas Service Outages, Notice Soliciting Comments (issued March 22, 2013).

The attached proposed Scorecard documents are hereby issued for public comment. Interested parties may submit comments on the draft Scorecard and any additional information pertinent to implementing the Scorecard electronically by e-filing through the Department's Document Matter and Management System (DMM) or to the Secretary at [Secretary@dps.ny.gov](mailto:Secretary@dps.ny.gov). Those unable to submit electronically may mail or deliver their comments to the Honorable Jeffrey C. Cohen, Acting Secretary, Three Empire State Plaza, Albany, New York 12223-1350.

Comments are requested not later than June 10, 2013. All comments submitted to the Secretary will be posted on the Commission's website and become part of the official case record.

(SIGNED)

JEFFREY C. COHEN  
Acting Secretary

## Notes on Draft Emergency Response Performance Measures (Scorecard):

The residents and businesses of New York have become increasingly dependent on electricity in recent decades. When outages occur, customers want to know that the electric utility is working to restore their service and customers are best served if they receive an accurate and timely estimate of when they will have service restored. Staff developed a scorecard that will measure each utility's ability to restore power to customers after an outage.

Accurate and timely Estimated Time of Restoration (ETRs) continues to be an area in which the utilities need to improve. ETRs furnished by utilities should be appropriate to the distribution of the communication vehicle; e.g., ETRs in press releases should reflect the area where press release is distributed, ETRs on municipal calls should be appropriate to the area where municipal call is held.

This scorecard will be applied to any event during which restoration takes more than three days which is measured from the initial reported outage.

The Commission may require the scorecard to be applied to assess company performance for other events in which the Commission determines to be necessary.

The scorecard has been divided into three categories:

- |                         |            |
|-------------------------|------------|
| 1. Preparation          | 100 points |
| 2. Operational Response | 600 points |
| 3. Communication        | 300 points |

Maximum Available Points 1000

Each utility will be required to provide data with which the scorecard can be completed on a per event basis within 30 days of the completion of restoration. Department of Public Service (DPS) staff (Staff) will use the information provided by the utility in its review and determine a score for each event for each utility. Electric companies will continue to be required to file a Part 105 report within 60 days as set forth in the Rules and Regulations of the State of New York (NYCRR).

The following terms and definitions are used in the Scorecard spreadsheet:

**Preliminary Damage Assessment:** The process by which an assessor gathers information for general types of damage, for use by utility to plan restoration as well as create a global ETR.

Detailed Damage Assessment: The process by which an assessor gathers information from each circuit to ascertain the level of damage for restoration planning, for use by the utility to set a local ETR.

Electric Outage Reporting System (EORS): EORS is a mapping and reporting system that allows DPS Staff to receive process, analyze, and report outage data quickly and in a uniform format. During an outage event, EORS is used to process data automatically submitted by utility companies and generate a range of maps illustrating the impact of the outage including geographical extent, affected population, and estimated recovery time. Additional EORS information is reported separately via e-mail as outlined in Department EORS Guidelines as shown below.

Estimated Time of Restoration: The time within which the utility estimates restoration will be completed. The Department's ETR guidelines are shown below.

Life Support Equipment Customers (LSE customer): Utilities must maintain records of LSE customer contacts, including any customers who the utility was unable to reach. Scores are applicable with respect to the following:

- Pre-event – Utilities must make contact with all customers who the utility knows are LSE customers prior to, but not more than 24 hours before the expected onset of an outage event.
- Within 12 hours – Utilities must attempt to contact all LSE customers within 12 hours of the onset of the restoration period.
- Also within 12 hours – Utilities must make at least one additional attempt, within the same 12 hours, to contact any LSE customer who was not contacted on the first attempt. Within 24 hours – Within 24 hours of the onset of the restoration period, LSE customers must have been either (a) directly contacted by the utility, or (b) referred to an emergency services agency (e.g., police or fire department) for emergency assistance.

Restoration: Start of restoration is at the beginning of the time at which peak outages occur. Restoration time will be established for each utility based on outage numbers automatically reported to the DPS.

Wire Guarding Criterion: The time it takes for a guard to arrive measured from the time the downed wire is reported to the call center. The report can come from the general public, police, fire department, from a first responder (911), utility worker, or other party.

# **ELECTRIC OUTAGE REPORTING SYSTEM (EORS) GUIDELINES**

Based on the specific conditions of the event and the number of electric customer outages, DPS Staff will notify the affected utilities when EORS activation is required. The utilities shall provide a summary of the situation, activities, and spreadsheets related to crewing, critical customers affected, LSE customers affected, and dry ice/bottled water. The utilities are not required to provide outage spreadsheets because DPS Staff receives this information every half hour.

The reports are due from each utility to Staff at 7am, 11am, 3pm, and 7pm or as defined by Staff. The utilities are reminded that additional reporting may be requested based on the severity of the event.

Based on the specific conditions of the event and the number of electric customer outages remaining, DPS Staff will notify each utility when deactivation of EORS is no longer necessary and may be discontinued for that event by the utility.

## 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. Utility 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. They 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 (where adverse weather conditions are applicable) and when the potential additional damage to the electric system from the 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).

## EVENT EXPECTED TO LAST 48 HOURS OR LESS<sup>1</sup>

<b>Within the first 6 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• 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 Electric Information Reporting System (EIRS).</li><li>• Provide available information to the public via customer representatives, IVR systems, and web sites.</li><li>• 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 <u>not</u> affect the time requirements below.</li></ul>
<b>Within the first 12 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• Provide DPS Staff with a global ETR and any available regional ETRs.</li><li>• 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).</li></ul>
<b>Within the first 18 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• Establish ETRs for each locality affected and make them available to the public via customer representatives, IVR systems, and web sites.</li></ul>
<b>Within the first 24 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• Consider issuing a press release for the upcoming news cycle based on conditions.</li></ul>
<b>Reporting guidelines during the event</b>
<ul style="list-style-type: none"><li>• 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.</li><li>• If EORS is activated and you are selected for reporting, provide restoration information updates four times daily via Electric Outage Reporting System (EORS).</li><li>• Notify DPS Staff when all storm related interruptions have been restored.</li></ul>

<sup>1</sup> Note: Although the guidelines generally refer to events where outages last more than three days, the ETR guidelines for events lasting less than 48 hours are required to comply with these criteria.

## EVENT EXPECTED TO LAST GREATER THAN 48 HOURS

<b>Within the first 6 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• 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.</li><li>• Provide a public statement indicating the likelihood of extended outages and make this information available via customer representatives, IVR systems, and web sites.</li><li>• 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.</li></ul>
<b>Within the first 12 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• 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).</li></ul>
<b>Within the first 18 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• 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.</li></ul>
<b>Within the first 24 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• Notify DPS Staff of what areas sustained the most damage to the electric system and ETRs, where known, on a general geographic basis.</li><li>• Issue a press release(s) for upcoming news cycles with the information described in previous bullet.</li></ul>

## EVENT EXPECTED TO LAST GREATER THAN 48 HOURS (continued)

<b>Within the first 36 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• For storms with expected restoration periods five days or less, provide DPS Staff a global ETR.</li><li>• 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.</li><li>• Identify any heavily damaged areas where large numbers of customers are expected to remain without service for more than five days.</li><li>• The utilities must have completed the first scheduled municipal conference call.</li><li>• Make ETR information available to the public via customer representatives, IVR systems, and web sites.</li></ul>
<b>Within the first 48 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• For storms with expected restoration periods five days or less, provide DPS Staff with ETRs by municipality.</li><li>• Provide DPS Staff with a global ETR (when outages are expected to less than five days, this is required within 36 hours).</li><li>• 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.</li><li>• Make ETR information available to the public via customer representatives, IVR systems, and web sites.</li></ul>
<b>Beyond the first 48 hours of the restoration period</b>
<ul style="list-style-type: none"><li>• 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.</li></ul>
<b>Reporting guidelines during the event</b>
<ul style="list-style-type: none"><li>• 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.</li><li>• Detailed outage and crewing spreadsheets are not required unless EORS is activated and you are selected for reporting.</li><li>• Notify DPS Staff when all storm related interruptions have been restored.</li></ul>

## DRAFT EMERGENCY RESPONSE PERFORMANCE MEASURES

### PREPARATION (10% of Total)

Area of Interest	Definition of Measure	Measurement Criteria	Points
Event Anticipation	Complete steps to provide timely and accurate emergency event preparation following an alert from NWS or the company's private weather service, in accordance with the company's PSC approved Electric Emergency Plan, for an event expected to impact the company's service territory.	Employees/Contractors planning	10
		Press Releases issued	10
		Municipal Conference Calls held	10
		Text Messages /emails sent	10
		LSE customers alerted	10
		Critical Customers notified	10
		Company compliance with Training Program as specified in Commission Approved Emergency Plan	10
		Participation in all pre-event NYMAG calls	10
	Materials / Stockpiles	Adequate supplies on hand	10
		Adequate sharing procedures in place and followed for sharing intracompany as well as with other utilities	10

TOTAL

100

**OPERATIONAL RESPONSE (60% of Total)**

Area of Interest	Definition of Measure	Measurement Criteria	Points
Wire Guarding	Response (average response time) to downed wires utilizing company employees or contractors as wire guards.	< 4 hours	30
		4 hours to 12 hours	15
Preliminary Damage Assessment	Completion of 90% of preliminary damage assessment in accordance with PSC approved Electric Emergency Plan	within 24 hours from start of restoration	30
		24 to 48 hours	15
Detailed Damage Assessment	Completion of 90% of detailed damage assessment in accordance with PSC approved Electric Emergency Plan	within 24 hours from start of restoration	30
		24 to 48 hours	20
		48 to 72 hours	10
Crewing	Presence of 100% of forecasted crewing required in accordance with PSC approved Electric Emergency Plan	at or prior to peak	20
		12 hours of peak	10
		24 hours of peak	5
	Deployment of crews quickly and efficiently	Crews not idle for more than one hour during designated work time	20
Estimated Time of Restoration (Made available by utility on web, IVR, to CSR's, etc)	Publication of Global ETR in accordance with guidelines	Exceeds expectation: < 24 hrs	50
		Meets expectation: 24 to 36 hrs (72 hr event) 36 to 48 hrs (120 hr event)	25
		>36 hrs (72 hr event) or >48 hrs (120 hr event)	0
	Publication of Regional ETRs in accordance with guidelines	Exceeds expectation: < 24 hrs	50
		Meets expectation: 24 to 36 hrs (72 hr event) 36 to 48 hrs (120 hr event)	20
		>36 hrs (72 hr event) or >48 hrs (120 hr event)	0
	Publication of Local ETRs in accordance with guidelines	Exceeds expectation: <36 hrs (72 hr event) or <48 hrs (120 hr event)	50
		Meets expectation	20
		>36 hrs (72 hr event) or >48 hrs (120 hr event)	0

280

**OPERATIONAL RESPONSE (60% of Total) continued**

Area of Interest	Definition of Measure	Measurement Criteria	Points
ETR Accuracy	Global ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 6 hours	50
		Accurate within +/- 12 hours	25
		Accurate within +/- 24 hours	10
		Accurate within +/- 48 hours	0
	Regional ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 6 hours	50
		Accurate within +/- 12 hours	20
		Accurate within +/- 24 hours	10
		Accurate within +/- 48 hours	0
	Regional ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 6 hours	50
		Accurate within +/- 12 hours	20
		Accurate within +/- 24 hours	10
		Accurate within +/- 48 hours	0
Municipality Coordination	Coordination w/ Municipalities regarding road clearing, down wires, critical customers, etc.	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	10
County EOC Coordination	Coordination with County EOCs	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	10
Utility Coordination	Electric Utility Coordination with other Utilities (Electric, gas, communications, water)	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	10
Safety	Measure of 1) any employee or contractor injury occurring during storm and 2) any accident involving employee or contractor during storm (two distinct measures)	No Lost Time Accidents	10
		No OSHA Reportable Accidents	10
Mutual Aid	Crew requests made through all sources of mutual assistance	Crew requests made at or prior to peak - matching actual crews needed	20
Emergency Plan	Emergency Plan	Appropriate Compliance with Filed Emergency Plans	30
Restoration Times	Time it takes utility to restore power to 90% of customers affected	TBD	70

TOTAL 600

**COMMUNICATION (30% of Total)**

Area of Interest	Definition of Measure	Method of Measurement Criteria	Points
Call Answer Rates	Customer calls answered by properly staffing call centers	90%+ calls answered within 90 sec.	30
		80% to <90% calls answered within 90 sec.	20
Press Releases	Issued daily until restoration is complete.	Press release must contain, at minimum, the following information: 1) Safety tips 2) Type and severity of the storm or other cause of outage 3) Geographic areas impacted 4) Number of customers out of service 5) Number of crews activated 6) How to report an outage and check for outage status 7) ETRs per operational guidelines.	20
Municipal Calls	Held daily until restoration is complete	Municipal call must provide, at minimum, the following information: 1) Type and anticipated severity of storm or other cause of outage 2) Geographic areas impacted 3) Number of customers out of service 4) Number of crews activated 5) ETRs per operational guidelines 6) Status of Wires Down / Road Clearing Activities	20
Municipal Calls	Department of Public Service Staff Evaluation of Municipal Calls	Extremely Effective (very responsive)	30
		Effective (responsive)	15
		Poor (not responsive)	0
Web Availability	Company's web site must be available around the clock, and must be updated at least hourly, until restoration is complete.	Website must provide, at a minimum, the following information: 1) Safety tips and how to report outage and check outage status 2) Number of affected customers 3) Global/Regional/Local ETRs per operational guidelines 4) Dry ice locations and times 5) Outage location maps of affected areas by municipality, County, Towns, Villages and major street intersections 6) Advise as to how often information is updated on the site 7) List alternative technologies (such as Facebook, Twitter, Text Messaging, e-mail etc.) that are available to maintain contact with the Company	30

**COMMUNICATION (30% of Total) continued**

Area of Interest	Definition of Measure	Method of Measurement Criteria	Points
LSE Customers	LSE customer contact	80% affected LSE customers contacted within 12 hours	15
		LSE customers that were unable to be contacted had at least two attempts made within 12 hours	15
		100% affected LSE customers contacted or referred to an emergency services agency within 24 hours	15
PSC Reporting	Provide storm event information to PSC in accordance with Electric Outage Reporting System (EORS) guideline requirements	All reporting on time, including at a minimum information required by existing EORS guidelines	40
Text Messages / emails	Text messages and/or emails issued daily to all customers for whom company has customer addresses on file	Messages must contain, at minimum, the following information: 1) Safety tips 2) Type and anticipated severity of Storm 3) Geographic areas likely to be impacted 4) Warning for LSE/Critical care customers 5) Number of crews activated 6) How to report an outage and check for outage status	30
Social Media	Use of Facebook and Twitter	Provide Updates as outlined in Commission Approved Emergency Plan	15
Outgoing message on telephone line	Recorded message providing callers with outage information is updated every two hours during a normal business hours and every six hours outside normal business hours	Message must contain, at a minimum: 1) Geographic area(s) affected 2) Estimated number of customers affected 3) Estimated time of restoration per operational guidelines	20
PSC Complaints	Number of storm/outage related PSC complaints received	≤ 20 per 100,000 customers affected	20
		≤ 40 per 100,000 customers affected	10
TOTAL			300