New York State Electric & Gas Corporation
and
Rochester Gas and Electric Corporation

Electric Utility Emergency Plan

March 29, 2024

REDACTED

NYSEG RGttE

Executive's Message

NYSEG and RG&E have a fundamental responsibility to the public, who depend on us to respond in critical situations, to keep our service operating and to restore it promptly when it is damaged. As detailed in this Plan, we prepare extensively to respond to customer outages due to severe weather and other risks to the operation of the electric system. An effective response includes providing accurate and up to date information to customers and stakeholders, along with two-way communications to provide optimal service.

This Emergency Response Plan (ERP) provides a framework for the Companies to follow to provide a consistent and effective emergency response. The ERP is based on the philosophies of the National Incident Management System (NIMS) and the Incident Command System (ICS) which outlines and assigns roles and responsibilities for preparing for and responding to all outage events. Our past emergency situations have taught us the importance of being prepared and flexible, and we have incorporated lessons from these events into this ERP.

Promulgation of the Plan:
This plan was prepared for use by NYSEG and RG&E and is distributed to town and state officials to inform and ensure agencies understand the process NYSEG and RG&E follow during restoration efforts. NYSEG and RG&E understand the value of an effective ERP in providing reliable electric service to the communities we serve.

Our communication to town and state officials is intended as an acknowledgment that NYSEG and RG&E understand our responsibility to be prepared and respond safely to emergency electrical outages.

To our Employees:
We have an obligation to restore power in a safe and efficient manner, and each of us at NYSEG, RG&E and AVANGRID is part of the team that makes sure this happens.

From the field operations employees that perform direct restoration work in hazardous conditions, to the customer service team that responds to customer concerns, the Health & Safety staff that monitors and briefs about the challenges faced, and the logistics support team that makes sure all employees and contractors have food and a place to stay, each of us does this work with the understanding that our customers are counting on us.

It is important that each of us follows a detailed plan and share the same understanding of priorities. Having a plan helps to ensure each of us is aware of safety hazards, prepares for them and works safely to minimize risks in our communities. We want to make sure that our co-workers are properly supported, and that all of us get home safely at the end of the workday.

We want to thank all of you who update and follow the ERP to restore service to customers safely and efficiently. We are proud to lead a team of employees so dedicated to serving our customers. Although each of us has different responsibilities, we should all be proud of how well the Companies meet each challenge and absorb the lessons of each event to improve our response for the next time.

Patricia Nilsen, President and CEO - NYSEG and RG&E

Michael Craven, Vice President - Electric Operations

Jennifer Pearce, Vice President – Reliability Assurance and Emergency Preparedness

NYSEG & RG&E

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1. Introduction

Reliable electric service is vital to the welfare and comfort of both NYSEG's and RG&E's (collectively referred to as the *Companies*) customers. Together with AVANGRID, as well as our Avangrid affiliate utilities, 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 manage emergencies on the electric system, including the restoration of outages caused by a cyber incident.

The Companies serve a large geographic area, as shown in Figure 1: *NYSEG and RG&E Service Areas and* respond to a wide variety of emergency conditions and customer needs. Consequently, the Plan is designed to be flexible and scaled to provide the most appropriate and effective response based on the circumstances surrounding an emergency.

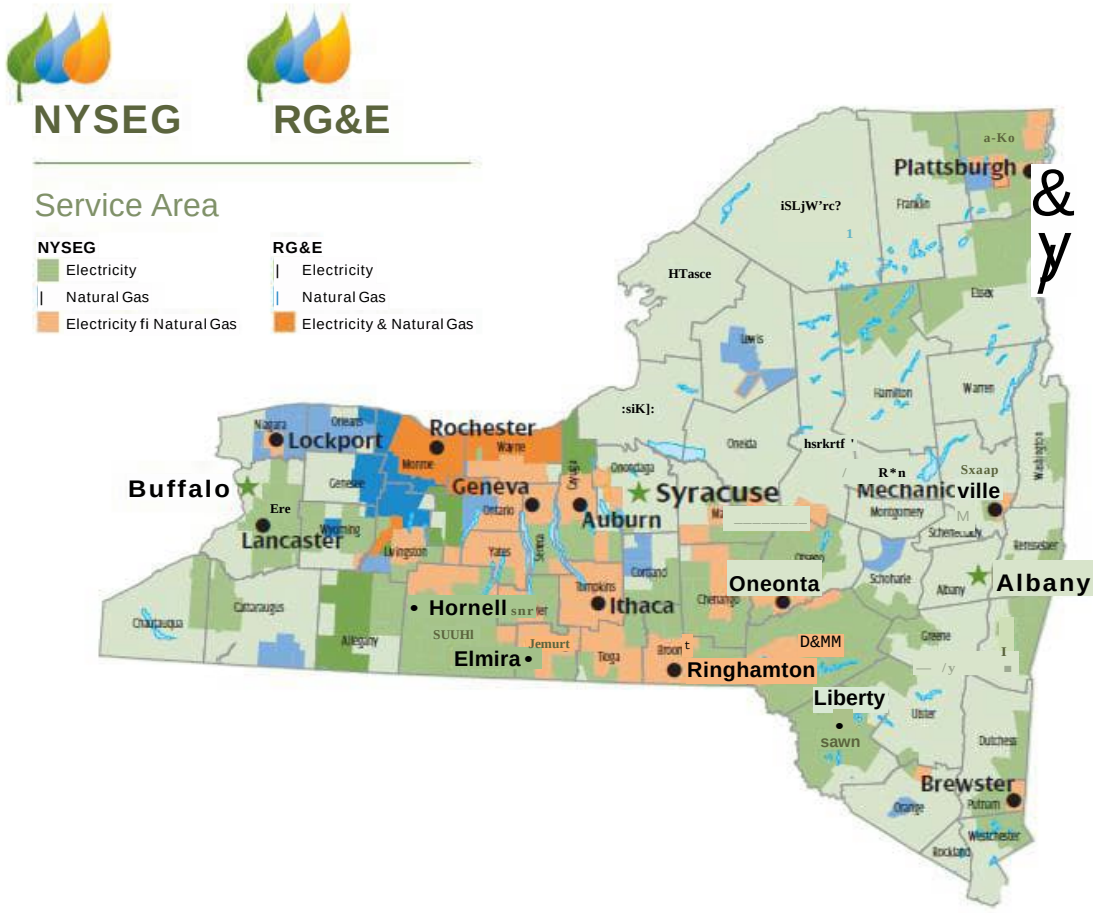

Figure 1: NYSEG and RG&E Service Areas

The Plan provides a framework intended to ensure the safe, fast, and reliable restoration of electricity service to our franchises' customers because of localized and widespread events.

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 concepts, and provide a coordinated and systematic approach to emergency preparedness and response;
- Minimize service interruption duration and the resulting impacts on customers;
- Provide information to customers and officials on response progress;
- Provide procedures to document coordination with utilities and emergency response officials; and
- Provide a measure for evaluating the Companies' recovery from emergencies and a self-assessment process and continuous improvement.

The Plan is designed to comply with Public Service Law §66(21) and 16 NYCRR §105 (see Appendix B) regarding electric utility emergency plans, as well as the August 16, 2013, DPS Staff Estimated Time of Restoration Protocol and the December 15, 2008 Event Notification Requirements (see Appendix B: *New York Regulations* to this Plan). This Plan is publicly available at the Companies' corporate headquarters located at 180 S Clinton Ave, Rochester, New York, as §105.3 requires.

As the Commission stated in the conclusion to the August 16, 2013, *Order Approving Electric Emergency Plans* in Case 13-E-0198 *(In the Matter of 2013 Electric Emergency Plan Review):*

> *Restoration Plans following outages are designed to safely restore power to the most customers in the shortest time. The safety of the public and crews restoring power is the first priority. This sometimes means that a storm must pass before crews are able to begin to assess and repair damage. To restore power after a major event, electric utilities rely on a process recognized as an industry standard to restore power. The order in which repairs are made must follow the path that electricity takes from the power plants to the customer. Crews begin with transmission and primary lines that can affect a large number of customers. Then, crews restore lateral lines that can affect many; secondary lines that affect fewer customers; and finally, service lines to individual homes. At the same time, utilities try to restore service to Critical Facilities, such as, hospitals, police departments, firehouses, and other public health and safety facilities on a priority basis. Many of these critical facility customers are in high traffic locations along primary lines, which are among the first facilities to be restored. Nonetheless, it is imperative that utilities have good communication plans for dealing with critical customers, so they can plan accordingly.*
>
> *Emergency preparation and response begins with an Emergency Plan that is based on past experience and future expectations. The Plan must also be developed recognizing reasonably attainable resources. Emergency Plans must be considered as dynamic and fluid documents, subject to continual review and update. Plan maintenance, through evaluation of events, exercises, and changing circumstances, is necessary to identify Plan deficiencies.*

Consistent with the Commission's regulations, the Companies may make material changes to this Plan under emergency conditions during an event to the extent required to restore service safely and efficiently. If so, those material modifications and the circumstances that caused them will be reported in writing to the Secretary of the Commission within 60 days from the restoration of full service. Material changes being considered during the year will be submitted to the Public Service Commission for approval before being incorporated into the Plan.

1.1 Overview

The Plan is modeled after the National Incident Management System. The National Incident Management System is the structure mandated by Homeland Security Presidential Directive-5 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.

Event response work can be dangerous. Everyone must continue to maintain safety awareness, practice safe behaviors, and look out for one another during these challenging events. The Companies' approach to safety in event readiness and response is outlined in Section 2: *Safety*.

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 power interruptions (regardless of size) effectively and efficiently. 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: *Event Classification*.

For local emergencies, channels of communication and field operations are coordinated by using the Incident Command System. The **Incident Commander** is the individual responsible for all incident level 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 **Incident Commander** has overall authority and responsibility for the management of all emergency response operations.

For emergencies of wider Company impact involving more than one **Incident Commander**, the **Area Commander** will be activated. The **Area Commander** is then responsible for the activation of Command staff, planning, coordination, monitoring, oversight, and deactivation at the statewide level, including the supervision of **Incident Commanders**.

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 participants. The use of standardized position titles assures that everyone will know who is in charge of an event and their chain of command. It is critical in emergency situations that there be no confusion concerning who is directing the response effort. The Incident Command System and Area and Incident Command staff are discussed in more detail in Section 4: *Area and Incident Command System and Responsibilities.*

In general, the Companies deploy as many resources as they determine are needed to safely and quickly restore service in each affected area. When the need outpaces local resources, the Companies have a process for supplementing their onsite workforce with resources from other areas within the Companies, as well as Mutual Aid from other municipalities, utilities, and contractors. The availability and the use of field resources are described in Section 5: *Field Resources*.

The Companies are committed to having a trained workforce available at all times to implement necessary emergency procedures; preparedness is the key to a successful emergency recovery operation. Preparedness begins long before being faced with an emergency and is implemented through planning, training, and conducting exercises. The timely and adequate availability of facilities, equipment, vehicles, materials, and supplies are also critical to successful restoration. These preparedness efforts are described in Section 6: *Event Preparation*

The framework for preparation for individual events, subsequent restoration, coordination with other utilities, and demobilization is provided in Section 6: *Event Preparation* and Section 7: *Restoration*, respectively.

The Companies recognize that communications with customers, local and state government agencies, and with the media are paramount to significant emergency recovery. Section 8: *Customers, Public Officials, and Media* provides guidelines and requirements to be fulfilled regarding communications. These guidelines and related conditions are expanded, as necessary, on the Incident Command level to ensure that customer requirements unique to specific areas can be effectively fulfilled.

The Companies recognize that some emergency events may be created by loss of technology, infrastructure, or resources outside of weather events. To ensure continuity of operations for such hazards, the companies maintain Business Continuity plans for essential business areas. Information about the Business Continuity protocols are covered in Section 9: *Continuity of Operations.*

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. This process is detailed in Section 10: *After an Emergency*.

?2 Related Documents

This Plan is the primary document governing the Companies' emergency preparedness and response. Redacted versions of this plan (confidential information removed) is available online at the Companies' websites, http://www.nyseg.com/ and http://www.rge.com/. The Companies' *Incident Command Position Guide* contains the Area and Incident Command organizational structure, and the Incident Command System position descriptions. These provide additional technical and tactical guidance. Contact information and related data sources are typically centrally maintained electronically on an intranet site accessible by Command staff.

The Companies' service area is segmented into Divisions that customarily function as Incident Command sites. Division Incident Commanders develop their own supplemental Division Emergency Plan to capture location-specific details. The Division Emergency Plan provides names and contact information for the local Incident Command System organization as appropriate and available. This includes each Division Incident Command System floor plans, staging areas; lodging, food, and other vendors; law enforcement and local emergency operations; telephone and cable contacts; human services agencies; media contacts; and state/county/local elected officials (the latter are updated at least semi-annually). 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 NYSEG and RG&E offices:

- Auburn: 73 Wright Circle, Auburn, NY 13021
- Binghamton: 4425 Old Vestal Road, Vestal, NY 13850
- Brewster: Terravest Corporate Park, 35 Milan Road, Brewster, NY 14509
- Elmira: 1 Electric Parkway, Horseheads, NY 14805
- Geneva: 152 Border City Road, Geneva, NY 14456
- Ithaca: 1387 Dryden Road, Ithaca, NY 14850
- Lockport: 6544 Lincoln Avenue, Lockport, NY 14094
- Oneonta: 65 Country Club Road, Oneonta, NY 13820
- Plattsburgh: 4125 Route 22, Plattsburgh, NY 12901
- Rochester: 180 S. Clinton Ave, Rochester, NY 14604
- Rochester: 400 West Ave, Rochester, NY 14611
- Sodus: 14 State St, Sodus, NY 14551

2. SAFETY

Nothing is more important than safety during event response activities. The safety of employees, contractors, and customers, as well as the general public, is always the Companies' first concern.

During response work, employees and contractors act according to established safety procedures.

Safety awareness is conveyed in many ways prior to events and during the event response process, including:

- The issuance of weather alerts;
- Discussion of safety issues at the start of all event preparation and response meetings;
- "Job Briefing" 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;
- Thorough training of all internal crews in Company, state and federal safety policies, procedures and regulations;
- Information provided to customers and the public through traditional and social media to remind them to stay away from downed wires and treat them all as if they were energized; and;
- Information is provided throughout the year and where applicable within; bill inserts, news releases, and on the Companies' websites and social media pages. These incorporate safety topics such as staying away from fallen or low-hanging wires, reporting damaged Company facilities immediately, installing and using generators safely, safely dealing with a flooded basement, and the appropriate 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 the 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 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 residents and the broader public, barricades, lights, flares, or other methods may be used to identify hazardous areas.

When it is safe to do so, Chapter 724 of the Laws of 2022 allows vehicles engaged in response to be exempted from travel restrictions which would have otherwise impeded operations.

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 extent of damage, available resources, and the estimated time needed to restore service. Consequently, an event's classification level may change, if warranted, by changing field conditions.

Overview of Emergency Classification Levels

Description	Class-1	Class-II	Class-III
Restoration Duration	**Expected to Restore < 24 hours** The severity is such that complete restoration can be accomplished within a twenty-four (24) hour period utilizing Company Resources.	**< 72 hours** The severity is such that complete restoration is expected to be accomplished within a Seventy-Two (72) hour period by Company Resources and or mutual assistance from other utilities, contractors, etc.	**> 72 hours** The severity is such that complete restoration cannot be accomplished in a Seventy-Two (72) hour period utilizing Company Resources. Restoration requires mutual assistance from other utilities, contractors, etc.

Figure 2: Overview of Event Classification Levels

Class I Events

Class I events are events which affect specific isolated parts of a Division and which cause damages that can be repaired in 24 hours or less. The Incident Command System structure is activated, as necessary, to coordinate all activities. For a Class I event, additional resources are brought in, as necessary, to complete response 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. Area Command is generally not activated for Class I events; though the **Incident Commander** will keep the **Area Commander** informed**.**

Class II Events

Emergencies that cause extensive damage throughout a Division are classified as Class II events. Service interrupted by a Class II event is anticipated to be restored within 72 hours. A Division usually activates their Incident Command 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 or is able to obtain resources from another Company location. Area Command may be activated to monitor or engage in response activities, coordinate the transfer of personnel from other locations, equipment, or material between Divisions if shortages are identified.

Class III Events

This classification refers to severe events that cause widespread damage within a Division and/or affects multiple Divisions. Damage caused by Class III events are anticipated to take more than 72 hours to restore. To restore service in affected areas, it is necessary to enlist support from Divisions outside the affected area. Often mutual aid from other utilities, municipalities and/or contracting companies or specialized services (such as aerial patrols) is required. During a Class III event, the Incident Command Structure is activated and generally expanded beyond what is used during a Class II event. Area Command 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. In a Class III event, the **Vice President – Electric Operations** or designee will inform

the **NYS DPS Director of Office of Resilience, Utility Security, Nuclear Affairs and Emergency Preparedness** or designee the specific date and time of the start of restoration immediately after it begins.

New York Public Service Commission (PSC) regulations (16 NYCRR §97.1(c)) also provides 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 RESPONSIBILITIES

The Companies' emergency management structure and responsibilities are based upon the Incident Command System framework developed under the National Incident Management System. The Companies' Incident Command System 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 they/their activates other Incident Command System roles, delegating tasks to those individuals. Depending upon the scope of an emergency, the **Incident Commander** has the option to activate whichever positions will add value to the management of the current event. A key Incident Command System 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 grow, and the Incident Command System will expand to maintain a manageable span of control. Reporting to the **Incident Commander** are General Staff (Section Chiefs), who may have Branch Directors and other personnel reporting to them during an emergency, and Command staff (Officers).

NYSEG and RG&E have extended the Incident Command System framework to include an Area Command level. For emergencies of wider Company impact involving more than one Incident Command, Area Command may be activated, if not already engaged. Area Command 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: *Event Classifications*. The Area Command Incident Command System structure ensures that priorities are based on system-wide needs and that Division Operations are consistent with Company responsibilities.

The **Area Commander** and **Area Commander – Deputy** coordinate pre-event activities, including monitoring weather forecast information, issuing weather alerts across the Companies, conducting event preparatory conference calls, initiating proactive mutual aid crew deployment, and activating staff to conduct proactive outbound communications to customers, municipal partners, elected officials, state and federal agencies, and media when warranted. As a major event materializes, the **Area Commander** is responsible for monitoring and overseeing that the preparation and response is effective. The Area Command staff:

- Coordinates periodic event update conference calls;
- Coordinates all mutual aid crews, 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 other critical systems; and completes other duties, as requested.

When event response has been completed, the **Area Commander** coordinates demobilization activities for all areas. The Emergency Preparedness Department coordinates a post-event assessment and prepares any post-event reports that are required.

An example of the Area and Incident Command Structure used by NYSEG, and RG&E is shown on the following pages.

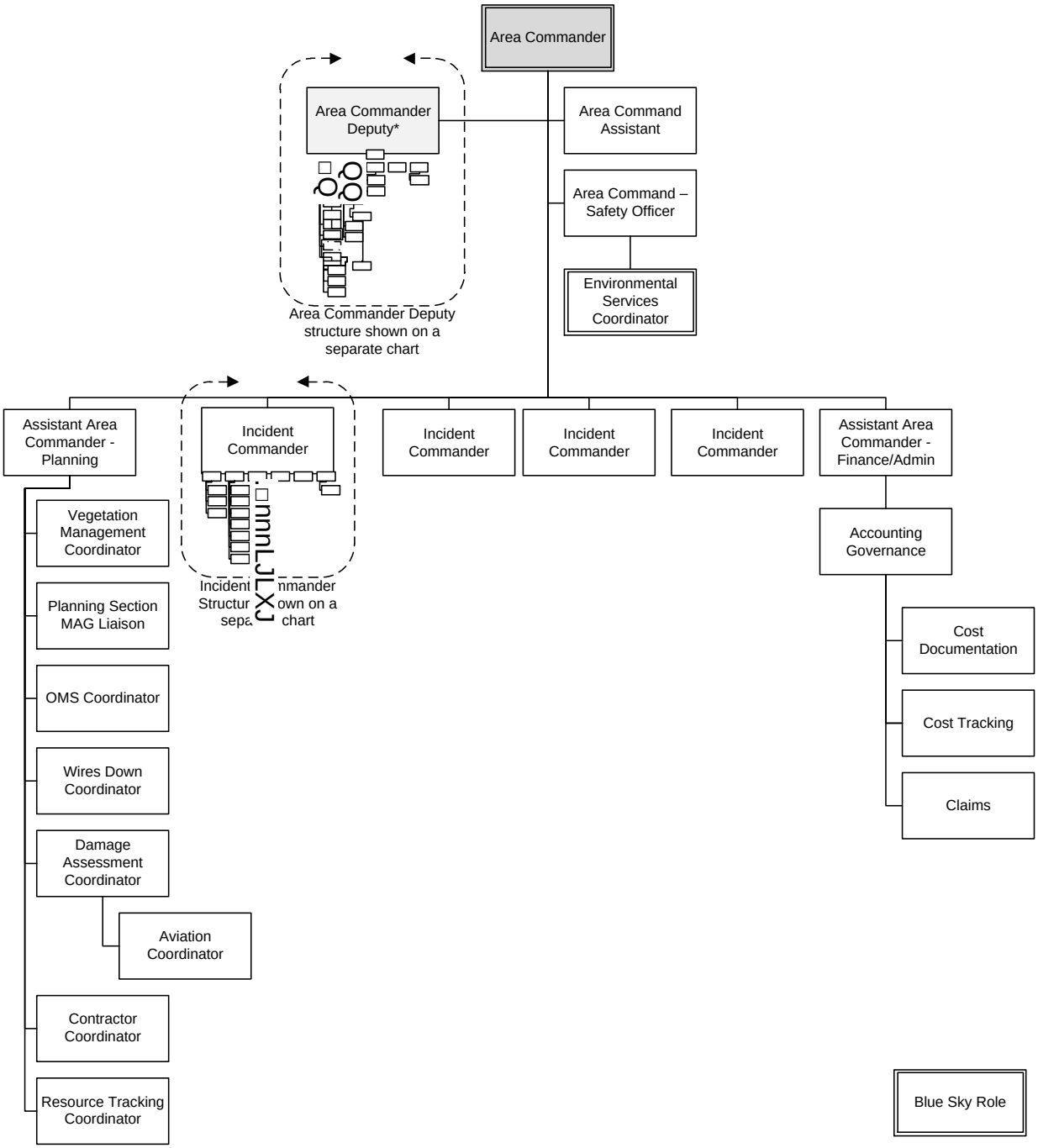

Figure 3: Area Command ICS Structure

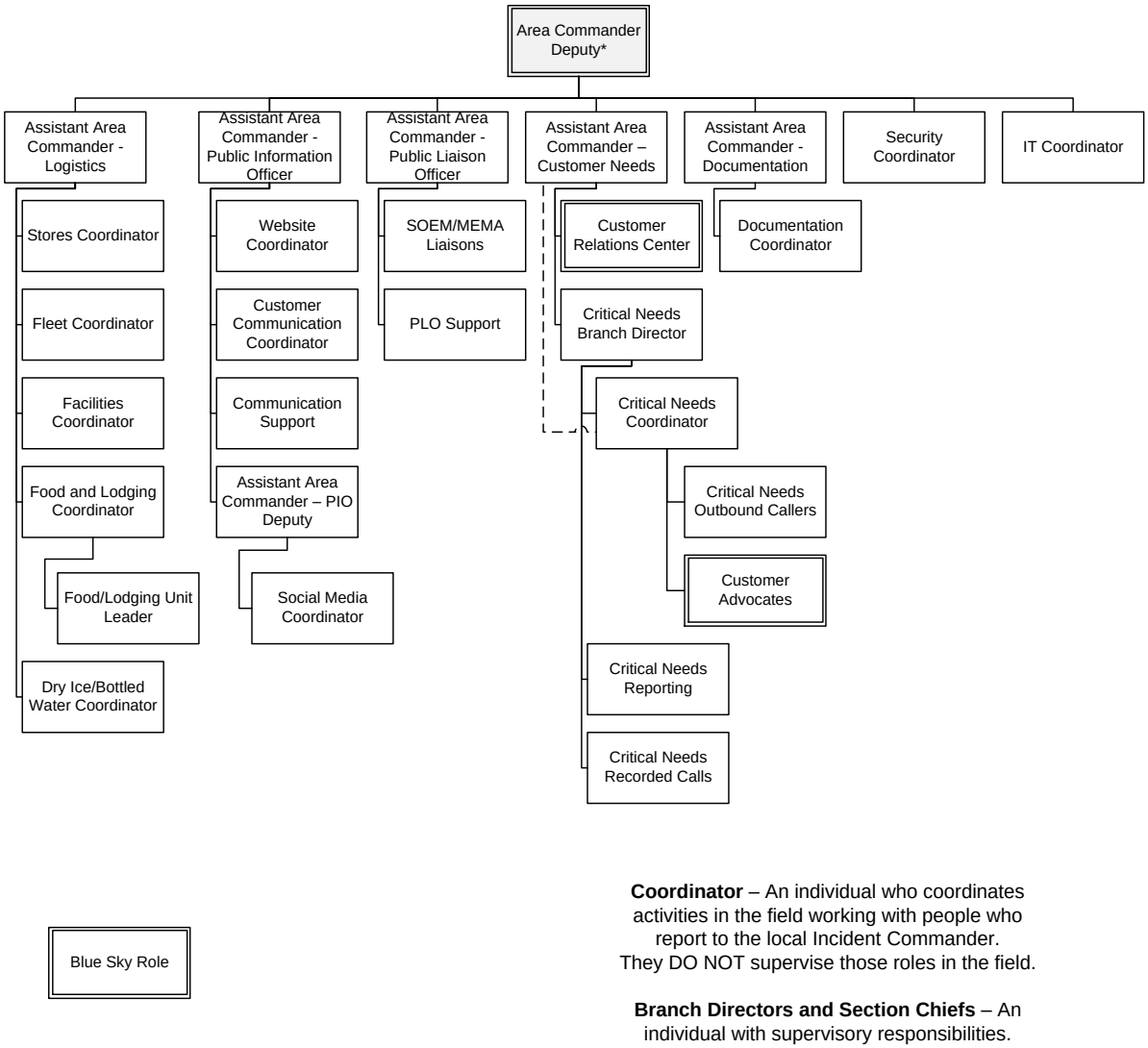

Figure 4: Area Commander Deputy ICS Structure

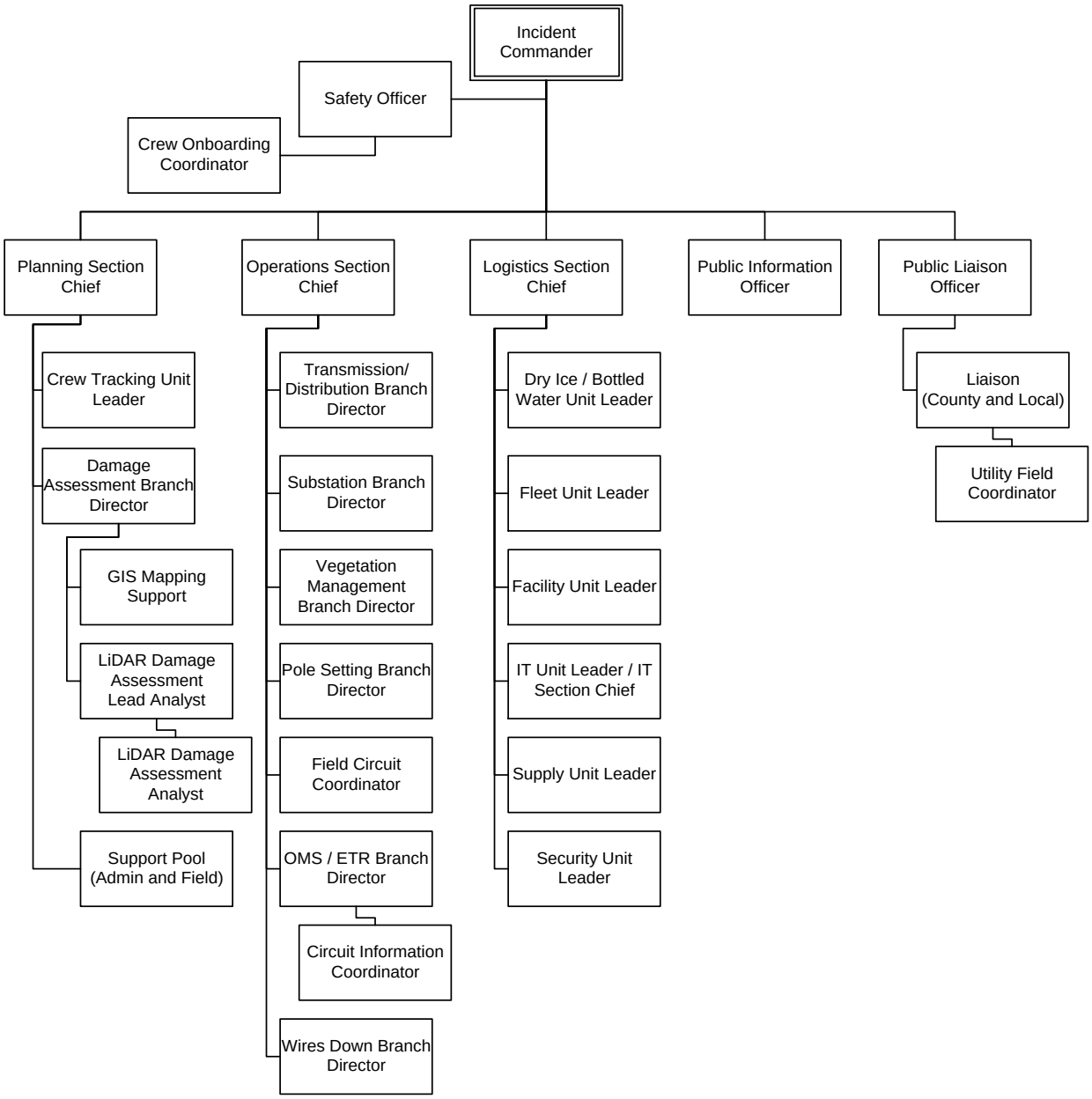

Figure 5: Incident Command ICS Structure

Incident Command System position descriptions are maintained in the Companies' *Incident Command System Position Guide*. All internal personnel with service restoration responsibilities other than field resources are identified in a central repository that is maintained by the Emergency Preparedness Department (a business area within Avangrid Networks) on an ongoing basis to accommodate employees who join or leave the Company or change emergency roles for other reasons. For the key Incident Command System roles, shown in Figure 3, 4, and 5, the abbreviated duties for positions include but are not limited to:

Area Command

- **Area Commander –** Responsible for the overall management of a wide area or multi-area event.
- **Area Commander – Deputy** – Responsible for management of the Command staff providing functions that support the incident, including Logistics, Communications (customer, media, and public officials such as elected officials, municipal and emergency management personnel), Information Technology, and Documentation.
- **Assistant Area Commander Customer Needs** – Responsible for coordinating all Customer Service-related activities, including Life Support, Critical Facilities, Customer Contact Centers, and Customer Appeals.
- **Assistant Area Commander Documentation** – Responsible for coordinating conference calls and collecting designated incident-related documentation.
- **Assistant Area Commander Finance/Administration** – Manages all finance and accounting operations for service restoration, including cost tracking, claims, and direction on timekeeping.
- **Assistant Area Commander Logistics** – Responsible for the coordination of resources, services and materials for Area Command.
- **Assistant Area Commander Planning** – Responsible for assembling information on incident objectives, recommends resource allocation priorities and assists the Area Commander and Area Commander Deputy in decision-making. The Assistant Area Commander – Planning acquires mutual aid and contractor resources when needed and tracks and maintains the status of critical resources.
- **Assistant Area Commander Public Information Officer** – Responsible for developing and releasing information to the media, incident personnel, and the general public.
- **Assistant Area Commander Public Liaison Officer** – Manages staffing and activities of the Public Liaison team at the regional, division, county, and municipal level for communication and coordination with other agencies or entities that have also been activated in response to the same emergency event.
- **Area Command Safety Officer** - Ensures the coordination of safety management functions and issues across jurisdictions and oversees and monitors emergency procedures to ensure safe practices. Additionally, the Area Command Safety Officer oversees the environmental spill desk and ensures that spills are handled and reported in accordance with all applicable laws
- **Contractor Coordinator** – Responsible for communication with outside contractors to obtain the necessary resources to effectively restore power to affected areas during emergency events. This individual instructs the contractors as to the submission of crew rosters.
- **Critical Needs Branch Director** – Responsible for Life Support Equipment customer contact prior to an expected event and regularly throughout an event or emergency, to determine the customers' status and the level of support needed. They also serve as a conduit for sharing service restoration information with Critical Facilities (e.g., nursing homes, hospitals, and industrial customers) in affected areas.
- **Critical Needs Coordinator –** Responsible for ensuring adequate staffing to make outbound calls to life support and critical facility customers; assign accounts, supervise outbound callers, gather and provide contact results as appropriate.
- **Damage Assessment Coordinator** – Oversees the acquisition and movement of internal and external damage assessment resources.
- **Dry Ice / Bottled Water Coordinator** – Identifies and assigns resources required, determines workspace requirements, locations, and procurement procedures.

- **Environmental Coordinator** – Responsible for providing resources and services to support the field employees for environmental assistance in the event of a spill. Environmental Services is responsible for response support, notification support, clean-up support, disposal support, regulatory compliance support, and documentation.
- **Facilities Coordinator** – Oversees facility maintenance services (sanitation, lighting, clean up) in buildings being used for restoration efforts.
- **Fleet Coordinator** – Responsible for ground transportation of personnel, supplies and equipment, fueling service, maintenance and repair of vehicles, and other ground support equipment used in multiple locations throughout the event or emergency.
- **Food / Lodging Coordinator** - Oversees food and lodging needs of the emergency event. These individuals act as a team leader for Food and Lodging Unit Leaders and are the single point of contact during the event. They coordinate and organize tasks for the group.
- **Food / Lodging Unit Leader -** Arranges for food and lodging of emergency personnel.
- **Information Technology Coordinator (IT)** – Responsible for information technology equipment and facilities, installing and testing of IT equipment, provides technical support information as required, and ensures the adequacy of the IT systems operating in affected areas throughout the event or emergency.
- **OMS Coordinator** – Monitors the Outage Management System and analyzes data, including restoration prioritization, resources assigned to outage and trouble incidents, and estimated times of restoration. The **OMS Coordinator** works with the incident level **OMS/ETR Branch Directors** to ensure full management of the OMS environment.
- **Security Coordinator** – Responsible for physical and cybersecurity aspects of the event, including overseeing security in buildings and staging locations being used in restoration efforts.
- **Stores Coordinator** – Responsible for equipment and supplies necessary to support the restoration effort across the Companies' service area, including the distribution of stocked items and non-expendable equipment and the ordering of supplies.
- **Utility Field Coordinator** – The designated lead for line and tree resources provided to a municipality or other external task force focused on road clearing caused by damaged electrical debris.
- **Vegetation Management Coordinator** – Monitors contract tree crew assignments, ensures contract tree crew time sheets are properly maintained, and ensures contract tree crews are briefed on Company policies and procedures. The briefing includes safety guidelines and the coordination of tree crew assignments with the appropriate Section Chiefs.
- **Wire Down Coordinator** – Oversees the acquisition and movement of internal and external wire guard resources.

Incident Command:

- **Incident Commander** – Responsible for the overall management of the local incident.
- **Crew Tracking Unit Leader** – Track assigned resources and document resource types.
- **Damage Assessment Branch Director** – Directs the activities of field personnel to perform an accurate damage assessment.
- **Dry Ice / Bottled Water Unit Leader** – Responsible for distribution of dry ice and bottled water; coordinates purchases and distribution.
- **Field Circuit Coordinator** – Tracks who is working on each circuit and obtains the work packet.
- **Logistics Section Chief** – Manage the local activity of the following areas: facilities, fleet, supply/stores, dry ice/bottled water, and food/lodging.
- **OMS/ETR Support Branch Di**rector – Maintain the accuracy of data in the outage management system (OMS).

- **Operations Section Chief** – Responsible for all operations activities that are focused on the restoration of utility service to the customer. Ensures field resources are available to provide to the municipalities for coordination as needed.
- **Planning Section Chief** – Responsible for all planning activities necessary to support response activities.
- **Pole Setting Branch Director** – Manage digger crews, schedules, and assigns poles to be replaced.
- **Public Liaison Officer** – Responsible for communication and coordination with other agencies or entities that have been activated in response to the same emergency event.
- **Safety Officer** – Management and development of personnel safety practices, safety measures, and procedures.
- **Security Unit Leader** – Responsible for local security throughout the event or emergency; this includes personnel as well as property security.
- **Substation Branch Director** – Performs substation damage assessments and repairs and assists with service restoration as needed.
- **Supply Unit Leader** – Responsible for local equipment and supplies.
- **Transmission/Distribution Branch Director** – Assigns work crews to specific tasks within an identified problem area.
- **Vegetation Management Branch Director** – Organizes vegetation management activities in support of the response and recovery phase of an event or emergency
- **Wires Down Branch Director** – Prioritizes wires down calls and determine whether make-safe personnel, wire guarding, and/or barricading is the appropriate response.

The typical candidate pool for Command staff includes (but is not limited to):

- **Area Commander:** Director, Electric Operations
- **Area Command – Safety Officer**: Supervisor, Environmental Health & Safety
- **Assistant Area Commander – Public Liaison Officer**: Director, Government & Community Relations
- **Assistant Area Commander – Public Information Officer**: Senior Manager/Manager, Corporate Communications
- **Assistant Area Commander – Finance/Admin**: Director – Performance & Budgets
- **Assistant Area Commander – Planning**: Managers in Electric Operations, Emergency Preparedness Department staff
- **Assistant Area Commander – Customer Needs:** Director – Customer Service
- **Incident Commander**: Managers, Regional Operations

If a position is not activated for event response, the position's supervisor or their designee will perform any tasks associated with the not-activated role.

Pursuant to 16 NYCRR requirements, corporate emergency contact lists for key management positions are filed each year with Staff. For Electric Operations, this filing includes key local and corporate personnel per operating area.

5. FIELD RESOURCES

Field resources are part of the Incident Command System and are critical to all restoration activities. Those emergency response roles, which are most closely connected to restoration, include damage assessors, wire guards, line workers, and vegetation management crews. Details regarding position descriptions discussed in this section are maintained in the *Incident Command System Incident Position Guide*. Information for mutual aid companies and contractors that provide field resources (including **Damage Assessors**, line workers, and tree crews) is maintained by Area Command staff, particularly members of **Area Command – Planning** (e.g., **Contract Coordinators** maintaining contractor line worker contacts).

The Companies use the most conservative known weather forecasts and their experience with similar storm events to assist in determining where and when to deploy crews so they can safely and quickly restore service in each affected area. If the event requires more resources than initially deployed, the Companies have a process for supplementing their local workforces with resources from other unaffected areas and Mutual Aid from other utilities, municipalities and contractors. Procedures related to resource management (planning, activation, staging, tracking and demobilization) can be found throughout Sections 5: *Field Resources* to Section 7: *Restoration*.

When projecting the resources required to restore electric service safely, several variables are considered, including the number and type of crews needed, the availability, proximity, and projected response times of resources. In general, if Company crews are readily available, using them first contributes to quick and safe response. Additional resources from other utilities and/or contractors may be requested and deployed prior to the event or as resource requirements change. All resource movements of this nature are coordinated through the Area Command Planning Section. The Companies use third-party vendor software, ARCOS, as the crew management tool used during events. During event preparations and event response, the Companies use Area and Incident Command **–** Incident Command System organization charts to list activated employees by position, shift, and location. These charts are maintained on the Companies *StormCenter* intranet site.

The **Assistant Area Commander – Planning** or designee under direction of the **Area Commander** will activate the **Vegetation Management Coordinator** to activate tree crew resources and identify availability. With guidance from the **Area Commander**, the **Vegetation Management Coordinator** will rely on experience and data inputs (e.g., weather forecasts, prediction models, and actual tree-related damage information) to develop a ratio of line-to-tree crews based on the nature of the event. Sample line-to-tree crew ratios would include a 4:1 ratio during a Class I event or a 2:1 ratio for a Class III event. These are samples and not absolute ratios; therefore, the **Assistant Area Commander – Planning** can, with assistance from the Area Commander adjust the ratio depending on the nature of the event, condition of vegetation, and type of infrastructure in the area.

5.1 Damage Assessors

Damage assessment is a necessary step toward effective restoration. Company personnel are assigned and trained as **Damage Assessors**. NYSEG maintains at least 175 damage assessment trained employees, excluding employees who perform restoration work during an emergency event. The Companies maintain and update a list of outside contractors used in securing additional **Damage Assessors**. This listing can be found in Appendix D: *Contractor List*. The responsibilities of **Damage Assessors** include:

- Complete, accurate surveys on assigned distribution circuits.
- Identification and categorization of equipment damage and specific location.
- Identification and reporting of emergency situations.
- Assess severity of wire down conditions or speak with the **Wire Down Branch Director** or qualified designee to determine severity level and request relief from a **Wire Guard**. The **Damage Assessor** will use the severity levels as defined in Section 7.1.5.1: *Wire Down Procedure.*

Damage Assessors are trained annually to ensure knowledge of assessment, personal and public safety, and wire guard procedures if this information is not part of their progression training or regular job function. Contractors will be trained prior to field assignment if obtained for the event or annually for contractors that support daily operations.

For more details on the use of **Damage Assessors** and the damage assessment process, see Section 7.1.6: *Damage Assessment*.

5.2 Wire Guards

Wire Guards shall be deployed as needed during restoration. Public and employee safety are our first priorities, and downed wires can represent a public safety risk. Downed wires cannot be prevented, and there may be significant numbers in the aftermath of some events. The Companies will respond to each incident 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 assess situations and barricade appropriately while maintaining public and employee safety.
- Understanding reporting protocols associated with wire down management.
- Remaining on site until the situation is determined to be made safe.

The Companies together will maintain 150 wire guard trained employees. Each Division will maintain individuals trained in the wire guard role. There will also be employees in other roles, such as **Damage Assessors**, who may be asked to guard wires. These roles will also have wire guard training, either held separately or included in their role training. If additional wire guards are required, the **Wire Guard Coordinator** may mobilize additional wire guards from other areas or from contractor resources. If acquiring resources after event impact, the **Wire Guard Coordinator** will seek to acquire internal resources from the closest unaffected locations as possible and/or contract wire guards. The **Wire Guard Coordinator** serves as the point of contact with external wire guard contractors. The Companies have reached agreements with contractors to mobilize approximately 250 additional trained wire guards or more if needed.

Wire Guard staffing for an event is dependent upon a variety of factors. Factors that influence staffing levels include 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 events, 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, those who are typically on-site in the division, are generally sufficient to handle wire guard needs during Class II events. For Class III events, the **Wires Down Coordinator** will be activated at the Area Command level and coordinate with Area Command Planning and Incident Command staff to secure the appropriate number of wire guard resources. The **Wires Down Branch Director** will be activated as part of the Operations Section to manage wire guard assignments. The **Wires Down Branch Director** will coordinate with Operations to avoid dispatching a wire guard to an area that is or has been addressed.

For Class III events or large events where there are significant numbers of wires down, wire guards from other divisions and/or external sources may be needed. Additionally, the **Operations Section Chief** will assign make safe crews qualified to clear an electrical hazard as a high-level priority relative to other restoration efforts. This further emphasizes the order of core priorities of Life Safety, Incident Stabilization, and Property Preservation.

Figure 6: *Damage Assessor and Wire Guard Staffing Matrix by Area* provides the resource range by event classification that Command staff have determined would be appropriate to meet response needs. In an actual event, the Area or Incident Command staff may determine greater or fewer resources are needed depending upon event conditions.

Division	Quantity of Wire Guards		Quantity of Damage Assessor Crews	
	Class I & II	Class III	Class I & II	Class III
Brewster	1 to 10	10 to 50	1 to 7	8 to 11
Liberty	1 to 10	10 to 25	1 to 8	9 to 11
Mechanicville	1 to 10	10 to 25	1 to 7	8 to 10
Oneonta	1 to 30	10 to 50	1 to 18	19 to 27
Plattsburgh	1 to 10	10 to 20	1 to 8	9 to 12
Auburn	1 to 10	10 to 20	1 to 4	5 to 6
Geneva	1 to 20	10 to 30	1 to 8	9 to 12
Ithaca	1 to 20	10 to 30	1 to 7	8 to 11
Binghamton	1 to 30	10 to 50	1 to 13	14 to 19
Elmira	1 to 20	10 to 30	1 to 9	10 to 14
Hornell	1 to 10	10 to 20	1 to 7	8 to 11
Lancaster	1 to 30	10 to 70	1 to 12	13 to 18
Lockport	1 to 10	10 to 20	1 to 2	3 to 4
RG&E Central	1 to 50	10 to 100	1 to 15	16 to 22
Fillmore	1 to 5	10 to 20	1 to 4	5 to 6
Canandaigua	1 to 5	10 to 20	1 to 4	5 to 6
Sodus	1 to 5	10 to 20	1 to 4	5 to 7

Figure 6: Wire Guard and Damage Assessor Staffing Matrix by Area

5.3 Line and Service Crews, Mutual Assistance

The Companies utilize **Line Crews** in response to all electric emergencies, and when appropriate utilize dedicated service crews.

Line Crews are responsible for make safe activities for wires down incidents and restoration work including:

- Make safe: de-energizing and clearing damaged electrical debris, as necessary.
- Restoration: replacement or repair of equipment and materials on the transmission, distribution, or secondary systems; or to customers' service wires.

The Companies utilize local resources and secure additional resources, as needed, to safely and effectively respond to system emergencies. Staffing levels are determined by considering various factors, including:

- Type and potential severity of the weather event (e.g., snow, ice storm, heavy rain/flooding, high winds, or hurricane).
- Total area potentially impacted (statewide or multi-state, individual or multiple Divisions).
- Timing of the event (during working hours, weekend/holiday, or immediately following another major weather event, etc.).

5.3.1 Staffing Level Considerations

Staffing levels are arrived at through joint discussions between Area Command (**Area Commander** and **Assistant Area Commander – Planning)** and Incident Command(s) (**Incident Commander** and **Planning Section Chief**) considering the above factors.

The number and type of resources required to respond to Class I, II, and III events is determined using the following 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 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 events, local resources along with on property contractors are sufficient to effectively address the system damage and complete the restoration. However, resources from a neighboring Division may also be utilized to complete the restoration depending on the type and extent of the damage.

Class III events will generally require additional resources. 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 resource (a company or contract worker familiar with the area) to guide the crews to their work assignments, to receive instruction, and provide communication with the main office.

The Companies supplement their local workforces with resources from other areas, as well as mutual aid from other utilities and contractors. When determining the source of additional resources several variables are considered, including the number and type of crews needed, along with the availability, proximity, and their projected response times. As an event progresses, additional resources may be requested and deployed as resource requirements change. All

resource movements are coordinated through the **Assistant Area Commander – Planning** or designee.

Schedules are structured to support the restoration effort while fostering safe working conditions. Although the needs of each emergency are unique, generally in Class I events resources may work more than 17 hours.

During the initial response period, wires down and other hazardous situations are made safe. After this initial period, the **Incident Commander** or designee assigns resources overnight to cover emergencies and perform partial repair work. This is done to create efficiencies during daylight hours (e.g. pole setting). Most 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 overnight hours, the Planning Section will assess remaining work, new power interruptions, damage, and develop the 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 **Assistant Area Commander – Planning** or designee. The **Assistant Area Commander – Planning** or designee assigns resources to ensure optimal use across the Companies is achieved, as directed by the **Area Commander**. If specific services are unavailable, then the **Assistant Area Commander – Planning** or designee will arrange for alternate services (for example, if helicopters are not available to fly, then additional ground resources may be substituted).

5.3.2 Resource Acquisition and Deployment

The Companies, through the **Area Commander** and **Area Commander – Deputy,** may activate internal crews and support staff and may secure Mutual Aid support from affiliate companies, other utilities, municipal electric entities, and/or contractors, in both the United States and Canada depending upon:

- The type and potential severity of the weather event with damage that may be incurred
- The total area impacted and potential incident count
- The timing of the event

The determination is made by the **Area Commander**, working with the respective **Incident Commanders**, **Area Commander – Deputy**, **Assistant Area Commander – Planning**, and **MAG** (Mutual Assistant Group) **Liaison** reporting to the **Assistant Area Commander – Planning**. The **MAG Liaison** activates the Companies' mutual assistance agreements if requested by the **Area Commander** or designee. These roles will continue to assess resource needs throughout the event's lifecycle to determine if requests are needed to be made.

When appropriate, the Companies will pre-stage internal and/or contractor resources in anticipation of pending severe weather events. The Companies are obligated to adhere to the North Atlantic Mutual Aid Group (NAMAG) and New York State Public/Private Utility Mutual Assistance Protocol (NYP/PUMA) guidelines, found in Appendix C: *Mutual Assistance Agreements*. The Companies also follow the border crossing protocol as detailed in Appendix C: *Mutual Assistance Agreements*.

5.3.3 Receiving Mutual Assistance from Canadian Utilities

To acquire Mutual Assistance and contractor crews from Canada, the Companies follow the Procedure included in Appendix C: *Mutual Assistance Agreements*. The procedure for crossing the US/Canada border has been developed by the New York State Office of Emergency Management.

This procedure must be followed, or assistance will not be allowed to cross the border. Effective pass through the border requires coordination with the Port of Entry (POE), the New York State Office of Emergency Management, and the New York Department of Public Service as described in the border crossing procedure included in Appendix C: *Mutual Assistance Agreements*. It is the responsibility of the **Contract Coordinator** collaborating with the **Area Commander** or **Assistant Area Command – Planning** to implement this procedure.

The Companies maintain contact lists to secure contract line, service, and tree crew resources from Canadian contractors. These resources supplement internal resources and/or mutual aid resources from other utilities. The Companies also work with Avangrid affiliate utilities to share resources, as appropriate, during event preparations and response. Typical staging options are mentioned in Sections 5.3.4 – 5.3.6: *Mutual Assistance*.

5.3.4 Local Event (NAMAG/NYP/PUMA not engaged)

A local event is defined as a smaller incident affecting one or a few divisions, with the ability to restore service within 24 to 48 hours to the majority of affected customers, typically a Class I or II event. The following actions would be taken by the **Area** and **Incident Commander** and Command staff operating under their direction:

- Determining local resource availability, retaining resources after hours, staffing overnight or before normal working hours, and/or arranging other coverage options;
- Repositioning of internal resources between divisions within the same operating company or between affiliate Companies;
- Acquisition of contractor resources (typically closest available resources acquired first then expanding out to farther away resources). The resources are tracked by the **Contract Coordinator**.
- Staging resources (internal or external) in strategic locations between areas expected to be impacted.
- Placing resources on standby (external resources only) to minimize travel time.
- Instructing internal resources to arrive at the start of shift packed to expedite travel.

During significant local events that could extend beyond 24 to 48 hours), **Incident Commanders** will be in contact with the **Area Commander** or designee to determine if nearby mutual assistance resources are able to expedite restoration and follow the steps outlined in Section 5.3.5: *Regional Event.*

5.3.5 Regional Event: NAMAG and NYP/PUMA has been engaged

A regional event is defined as an incident affecting multiple locations or one location with extensive damage (flood, tornado, etc.), with initial assessments, determining additional resources are required to facilitate restoration. In this case, the Companies would implement all the steps outlined in Section 5.3.4: *Local Event* and engage the mutual assistance process as follows:

The **MAG Liaison** will:

- Follow the present guidelines outlined in the respective Agreements (Appendix C: *Mutual Assistance Agreements*) and Section 6.2: *Coordination with Mutual Aid Companies and Contractors*; working with the respective mutual assistance groups to schedule requests and acquisitions in the evening and early morning hours if this would hasten response.
- Consult with the **Assistant Area Commander – Planning** and/or **Area Commander** if a mutual assistance request is to be made for external transmission personnel to enable the Companies to reassign internal transmission resources to distribution work. If so, the **MAG Liaison** would make the request to the respective mutual assistance groups, and, if responding resources could mobilize with no delay to the Companies' restoration process, Company transmission resources would be reassigned by Area Command/Assistant Area Command Planning to other restoration work.
- Participate on mutual assistance calls to provide or request resources depending upon the Companies' and affiliates' needs and threats. Coordinate the acquisition and/or supply of resources between Avangrid Networks operating companies and the mutual assistance member organizations.

5.3.6 National Event: EEI National Response Event (NRE) Procedures activated

Once the Edison Electric Institute (EEI) formally declares a National Response Event (NRE), then the specific EEI NRE guidelines are followed by all member companies. During an NRE, the **Vice President – Reliability Assurance and Emergency Preparedness** or designee(s) will be responsible for coordinating actions between the Companies and the NRE leadership. The NRE Guidelines are maintained on the Emergency Preparedness shared drive and a hard copy is kept by the Vice President, Reliability Assurance and Emergency Management.

5.3.7 New York State Public/Private Utility Mutual Assistance Protocol Coordination

The New York Public/Private Utility Mutual Assistance Protocol, found in Appendix C: *Mutual Assistance Agreements,* is an outline of general principles and practices for the New York utilities to follow, enabling them to leverage a public/private partnership among the utilities within the state. This protocol provides access to critical resources to facilitate and expedite utility restoration following an emergency impacting New York.

The foundation of this protocol draws upon the concepts, which have been utilized by members of but not limited to, the NAMAG and New England Public Power Association (NEPPA) mutual assistance programs. The protocol is intended to be flexible as it is not possible to predict exactly what the nature or scope of an emergency will be. It allows individuals in command to call upon further reserves of personnel, supplies, equipment, and space in an organized, documented, and logical manner.

In instances where the Company requests mutual assistance through the NAMAG process, a formal notification will be made to the protocol chairperson that the NAMAG process has been enacted and that mutual assistance may be requested from the municipalities and electric cooperatives. This protocol is not intended to usurp any organization's primary means of securing additional assistance, rather provide a supplemental source of additional potential resources within NYS.

5.4 Circuit Information Coordinator

The **Circuit Information Coordinator** manages the outage and trouble data in OMS and provides the information from the **Field Circuit Coordinator** to the **OMS/ETR Branch Director** for communications to a larger group as needed (e.g., Public Liaison, Logistics Section, Planning Section, etc.). The **Circuit Information Coordinator** coordinates with multiple **Field Circuit Coordinators** (see Section 5.5: *Field Circuit Coordinators*) and gathers information from them of use to other Command staff.

The **Circuit Information Coordinator** enters Company and contract crew information into OMS for tracking purposes to provide situational awareness for Command staff of the crewing assignments for all circuits begin work. The **Circuit Information Coordinator** will obtain updates from the **Field Circuit Coordinators** and transfer the information into OMS, including:

- Updating ETRs;
- Closing out outage and trouble orders;
- Creating new outage and trouble orders; and
- Assigning crews to open orders.

5.5 Field Circuit Coordinators

The **Field Circuit Coordinator** is responsible to track resources working on their assigned circuit. They will receive a circuit – specific work packet at the start of each operating period from the **Planning Section Chief** or designee (e.g., may be provided by a **Field Support Runner**), they will prioritize and dispatch outage and trouble jobs to their designated **Line Crews** and vegetation resources.

Field Circuit Coordinator responsibilities include:

- Organize the restoration team assignment (who is assigned to which circuit).
- Prioritize and dispatch line crew assignments.
- Report back to the **Circuit Information Coordinator** the ETRs for outages assigned to restoration teams.
- Report completed restoration assignments back to the **Circuit Information Coordinator** described in Section 5.4: *Circuit Information Coordinators.*
- Clear and create power interruptions through the **Circuit Information Coordinator**.
- Validate plan and progress with the **Planning Section Chief**, **Operations Section Chief,** and **OMS/ETR Support Branch Director**.
- **Field Circuit Coordinators** may also coordinate meals, lead crews to and from work and lodging sites.
- Complete documentation of work completed as directed by **Operations Section Chief** or designee.
- Report any safety incidents or concerns.
- Communicate any environmental issues (e.g., damaged or leaking transformers).

- Monitor the performance of mutual assistance resources and report any abnormalities as applicable.
- A **Field Circuit Coordinator** may be qualified if they have experience with the Companies' switching and tagging rules, or are qualified to hold clearance, have previously or currently supervised crews, or have received on-the-job training. If previously qualified, the **Field Circuit Coordinator** will prioritize and dispatch crew assignments. If not previously qualified, they will follow the **Planning Section Chief** or designee's work plan, under the **Operations Section Chief's** direction**,** or a designee regarding prioritization and dispatching.

Employees qualified as **Field Circuit Coordinators** generally will have engineering experience, either as an engineer in substation, transmission, capital delivery areas, or as a field planner, a substation employee, a specialist in metering, or hydro areas. The Companies maintain a list of trained **Field Circuit Coordinators** (internal) and a list of contractors with personnel able to perform the FCC role. During event activation, the **Area Commander** will direct the **Assistant Area Commander – Planning** to work with the respective **Incident Commanders** to determine the number of **Field Circuit Coordinators** needed in the affected areas. If necessary, based on that assessment, the **Assistant Area Commander – Planning** may have additional **Field Circuit Coordinators** mobilized from other areas including contract companies to respond.

5.6 Vegetation Management Crews

Vegetation Management crews (also known as tree crews) support line operations by completing vegetation removal to safely restore power. **Vegetation Management** crews also support make safe and road clearing operations, as assigned. 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

Strategies for **Vegetation Management** resource acquisition, staging and deployment; scheduling; requests for specialty equipment; and planning for the next operating period follow the same process as described for **Line Crews** in under Section 5.3: *Line and Service Crews, Mutual Assistance.*

5.7 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. Restoration and safety priorities will be communicated to county and/or state officials by the PLO. In the event that support from county and/or state partners is required to meet restoration priorities, the Companies PLO will communicate these priorities to the relevant EOC personnel. Note that activation of the National Guard requires authorization by the Governor and coordination with both DPS Staff and the New York State Office of Emergency Management.

Under the direction of the **Assistant Area Commander – Planning** or designee, the Companies will utilize such resources as appropriate during individual events. The **Incident Commander** or designee shall consider the level of resource training, needs, constraints, and factors such as safety and the availability of personnel to guide, direct, coordinate, and oversee the work these non-traditional resources are being asked to perform.

5.8 Documentation

This Plan is reviewed, revised, and filed with the New York State Public Service Commission by December 15 of each year (or as directed by DPS Staff) or revised and/or filed at other times if there are substantive changes to the information. The Emergency Preparedness Department and the **Incident Commanders** review the Division Emergency Restoration Plans. The 16 NYCRR §105.4(b)(5) specifies that contact lists will be updated at least semi-annually. The Companies meet this requirement by designating responsibility to various business areas. The contact lists and business areas responsible are shown below in Figure 7: *Contact Lists and Owners*, with the owners included:

Contact List	Responsible for Maintaining Contact Lists
Utility Personnel Assigned Service Restoration	Performance & Governance
Mutual Aid Companies and Contractors	Emergency Preparedness
Life Support and other Special Needs Customers	Customer Advocates
Human Services Resources	Customer Advocates
Print and Broadcast Media	Corporate Communications
Operators/Managers of Hotels, Restaurants, and Dormitories	Emergency Preparedness
State County and Local Elected Officials	Government & Community Relations
Law Enforcement, Emergency Management, and Response Personnel	Government & Community Relations
Medical Facilities	Emergency Preparedness
Vendors	Accounts Payable

Figure 7: Contact Lists and Owners

The Companies maintain and routinely update lists electronically. Owners of these lists are encouraged to maintain a printed backup copy as well as an offline digital copy in case they are unable to access the data online. As part of the submission letter when filing the Plan annually to the Commission, the Company will include a statement to certify that the contact lists were updated per the requirements in 16 NYCRR §105.4(b)(5).

The Companies are members of the North Atlantic Mutual Aid Group (NAMAG) and the Edison Electric Institute (EEI) and New York Public/Private Utility Mutual Assistance Protocol (NYP/PUMA). Copies of the signed agreements are included in Appendix C: *Mutual Assistance Agreements*. The Companies contribute to groups' readiness activities and participate in event conference calls and planning.

5.9 Communications

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

- The Companies' Customer Communications Department provides information to customers on emergency event preparation (both the Companies and the customers' preparations) four times per year in our bill inserts, in appropriate Company brochures and on the Company websites http://www.nyseg.com/ and http://www.rge.com/.
- The Companies' Corporate Communications Department publishes safety messages to our customers via social media channels and other electronic means (e.g., Facebook™ and Twitter™).
- Communications by Customer Service Personnel with Life Support Equipment customers to encourage them to be prepared for emergencies are in Section 8: *Customers, Public Officials, and Media*.
- New York Government & Community Relations personnel contact public officials to discuss emergency procedures, response methods, restoration priorities, lists of identified Critical Facilities, critical roads, potential dry ice locations, and vulnerable population locations, and to exchange contact information. See section 8.7 for additional details on Public and Emergency Management Officials and Media Contact.
- Ongoing automated verifications (e.g., 30-minute intervals) of the Electric Outage Reporting System (EORS) are conducted by Information Technology Group personnel to ensure that the system remains operational. If the process that transfers the files fails, the **Information Technology Coordinator** is notified for investigation and resolution. Additionally, Information Technology has a monitoring system in place that checks the date of the files, and if the files are older than 30 minutes, an automated incident is created and assigned to the Information Technology Group for investigation.

5.9.1 Communications for Widespread Prolonged Outages

Pursuant to Public Service Law (PSL) §73, the New York Public Service Commission has defined a "widespread prolonged outage" as an outage event impacting at least 20,000 customers at the same time and having one or more customers who remain without power for 72 consecutive hours or more due to utility-owned equipment being unable to provide service. Customers meeting the requirements of PSL 73 can seek reimbursement for spoiled food and/or prescription medicine as approved in the Companies' respective tariffs.

The **Area Commander or designee** will notify the **Assistant Area Command - Public Information Officer** that the criteria for a widespread prolonged outage has been met. Accordingly, the 14-day deadline for customers' reimbursement claims will begin once a widespread prolonged outage lasts 72 consecutive hours. No later than Noon the following calendar day, the Companies will use various means to communicate and clearly state the 14-day deadline for when customers must submit claims for reimbursement of spoiled food or prescription medication, including but not limited to press releases, television news updates, email, websites, and outbound calls. Recognizing that each event is unique, the Companies will assess the most effective means to notify impacted customers of the deadline to submit claims for reimbursement. Thus, whereas certain situations may warrant utilizing mass communications to notify the public, other circumstances may justify simply reaching out to affected customers directly on an individual basis.

In general, if criteria for an extended outage is met, the **Assistant Area Commander – Public Information Officer** will develop a media statement or incorporate information about spoilage claims

into a press release and customer emails, as appropriate. Outbound call campaigns may also be developed, as described below. All communications about spoilage claims will direct customers to visit our websites for details on eligibility and how to apply. The **Assistant Area Commander – Public Information Officer** will distribute the press release or media statement by noon the following the calendar day after 72 consecutive hours, with follow up media coverage as requested. While the **Customer Communications Coordinator** will execute email campaigns and the **Outbound Call Coordinator** will execute outbound calls by noon the following calendar day after 72 consecutive hours.

If the event has impacted a relatively small number of customers, the Company will make arrangements to contact them directly using their phone number and/or email address saved in Customer Care System as well as issue a media statement. The **Assistant Area Commander – Public Information Officer**, working with the **Customer Communications Coordinator** will draft outbound call messages and outbound email messages that explain the 14-day deadline and that they may qualify for food and or prescription medication spoilage. The **Customer Communications Coordinator** will execute the email campaign by noon the following calendar day after 72 consecutive hours. The **Outbound Call Coordinator** will execute outbound calls by noon the following calendar day after 72 consecutive hours. See Appendix A; *Additional Information* for communications templates.

5.10 Equipment

As part of the Materials Management pre-event activation process, Material Planning and Stores reviews stock on hand when the **Stores Coordinator** requests a pre-storm checklist. Material Planning and Stores also places orders with suppliers to bring inventory levels up to necessary levels. The Companies' Materials Planning Department contacts suppliers and vendors to advise of possible event coverage so all will be ready to respond.

The Materials Management Department's Material Planners contact electrical distributor(s) and pole transportation company(s) to review and make ready the materials trailer for mobility if needed. Included in the review are inventory items that are used to repair electric infrastructure typically damaged during an event. This may include items such as, but not limited to, poles, cross arms, transformers, wire, connectors, fuses, and other electric hardware.

Inventory levels are checked for construction maintenance materials. These items are reviewed weekly at each warehouse. Materials identified as critical to the infrastructure are reviewed weekly by Materials Management, Material Planners, and Stores Supervisors, under the direction of the **Manager-Stores Operations**, per the *Critical Item Availability Process* located in Appendix A: *Additional Materials*.

Critical distribution, transmission, and gas inventory are reviewed weekly by Material Planners and Stores Supervisors to ensure established quantities of critical material are maintained at a rate of 95.8%. Inventory review is included in the pre-event checklist and is evaluated during the planning and preparation for possible events.

Another source of materials during major events is the New York Material Sharing Group (NYMSG). The Materials Management Department represents the Companies in the NYMSG. The participating NYMSG companies have agreed to utilize a warehouse network comprised of participating company existing warehouses and vendor facilities, to stockpile key materials and equipment. The materials are to share as outlined by the group's governing principals/procedures. The stockpile can be used during emergency events if one of the participating companies have material needs that cannot be supplied through their normal channels. As stated in the NYMSG protocol:

The NYMSG members will attempt to come to a consensus on materials distribution, where possible, understanding that the group works best as a cooperative effort. The consensus process does not replace an individual Participating Company's own decision-making process within their organization.

5.11 Training and Exercises

The Companies provide employees with general training, specialized training, on-the-job training, and exercises. The Companies utilize multiple methods of training including, but not limited to classroom, web-based, on-the-job shadowing, exercises, manuals, just in time, and procedural documents. The Companies also participate in exercises conducted by external parties (e.g. County Emergency Management Offices and neighboring utilities).

5.11.1 Training

The **Director-Shared Services** is responsible for tracking the overall training related to electric emergency events. Managers and supervisors of employees with emergency response as part of their regular jobs are responsible to ensure the employees are trained. Emergency Preparedness Department has designated subject matter experts (SMEs) for emergency response role training that is not part of an employee's regular job responsibilities.

General training includes an overview of the Emergency Plan, Incident Command System training modules, wires down training and/or other training as appropriate for the employees' roles within the emergency event process.

Specialized training is conducted, as required, to familiarize personnel with specific duties or skills that are related to their associated emergency event roles. These may be duties that an individual is asked to perform as a part of their emergency event role but may not be related to their normal job function. When a procedural change occurs, follow-up training is provided as necessary.

Specialized training can also be conducted in the field or as a part of an employee's current or former job responsibilities. The roles receiving specialized training conducted include, but are not limited to:

- Damage assessment
- Wire guarding
- Customer calls and callbacks
- County and local liaison

The Companies, with leadership by the Emergency Preparedness Department, hold joint storm response training with exercises throughout the year in coordination with relevant business areas. The Emergency Preparedness Department coordinates training deliverables associated with emergency response roles. The New York Government & Community Relations Department and Emergency Preparedness Department invite external participants such that **Liaisons County/Local** and local officials have the opportunity to fully understand the Companies' processes and procedures during an actual event. Municipal partners are invited by **Public Liaison Officers** or their designees. In some cases, role-specific training and exercises are led and designed by subject matter experts with the Emergency Preparedness Department invited or made aware of the activities. Procedures covered may include but not be limited to municipal coordination for blocked roads or critical facility prioritization and the development or communication of work plans and crew assignments.

5.11.2 Exercises

The Electric Operations Business Area and Emergency Preparedness Department are responsible for the coordination related to exercises. The Emergency Preparedness Department is responsible

for evaluating the effectiveness of the exercises. The Emergency Preparedness Department coordinates the development and delivery of exercises using the Homeland Security Exercise and Evaluation Program (HSEEP).

Exercises are used to engage employees to practice specific response duties and tasks. Local exercises to address particular aspects of emergency response may be conducted as appropriate, and personnel outside the Companies will be offered an opportunity to participate in those exercises, particularly County Emergency Operations Center staff, as appropriate based on the exercise type. The Annual exercise is held by June 1 each year in accordance with 16 NYCRR §105.2.
The following recommendations are taken into account when developing exercise scenarios:

- Exercise the Emergency Plan at least annually.
- Have lessons learned process to review and revise procedures after each exercise/event.
- Document identified strengths and areas for improvement uncovered during the exercise and consider them for implementation, as appropriate.
- Participate or initiate joint exercise scenarios with natural gas and telecom groups within the service area. Telecommunications exercises will include the pole installation process.
- Company communications and coordination will be evaluated as a part of the exercise.
- Regularly exercise emergency scenarios 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. Exercise scenarios will, minimally every five years, also include severe flooding and manual processes (in case of catastrophic failure of critical systems, e.g., OMS, Call Center)
- Design exercises to ensure that employees fully comprehend their role during an emergency and provide “hands-on” opportunities as appropriate.
- The Companies will ensure a cross-section of personnel based in respective NYSEG and RG&E service areas participate in each other’s exercises to facilitate understanding of each other’s areas.
- Liaisons not typically located in the area of the exercise will be included to train, ensure familiarity of the region, and have access to relevant information unique to the area.

The purpose of exercises is to train and refresh the skills of employees assigned to response tasks that may be outside of their normal areas of responsibility. Scenarios are established ahead of time and generally draw from previous storm post-assessment and areas identified for revision or improvement. Scenarios are not shared with participants until the start of the exercise.

Various injects may be introduced, at the discretion of the facilitator, to test reaction to unplanned or changing circumstances. The exercise may involve contacts with outside agencies, local governments, and others who would normally be included in service restoration responses.

Division management and Emergency Preparedness are responsible for conducting and evaluating an annual exercise. The Department of Public Service (DPS) Staff will be notified at least two weeks in advance of the scheduled annual exercise.

In addition, in accordance with 16 NYCRR II A § 105.2: Definitions, the **Vice President-Reliability Assurance and Emergency Preparedness**, or designee may waive this exercise requirement if previous incidents during the calendar year provided sufficient experience only if approved in writing by the DPS Director of the Office of Resilience and Emergency Preparedness, or designee. For actual preparations (*a.k.a.*, real-world incident experience) in lieu of an exercise, the Company shall certify, in accordance with 16 NYCCR II A § 105.3: Submission of Electric Emergency Plans that all requirements of § 105.2: Definitions were met.

A calendar of planned exercises is found in Appendix E: *Exercise Schedule*.

5.12 Limit Impact of Emergency Events

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

The Resiliency and/or Planning Departments coordinates with Electric Operations in reviewing and creating longer-term improvement or mitigation plans focused on enhancing reliability. This group conducts a review of facilities susceptible to outside factors, such as flooding or limited access, in parallel with reliability issues, safety, and other factors. This element has been added to our facility evaluation criteria and will be considered as future construction projects are approved.

As discussed in Section 8.3: *Final Phase*, the Electric Operations Department, particularly the Division personnel, utilize circuit sweeps to review infrastructure affected by an event and to make repairs or arrange longer-term repairs as needed. The completion of this phase of the restoration process also serves to potentially reduce or limit the impacts of future events.

6. EVENT PREPARATION

Area and **Incident Commander(s)** or their designees notify designated Area Command and Division Incident Command personnel of imminent and severe weather that is a threat to the transmission and distribution system. These notifications will take the form of situational awareness emails, calls, texts and/or meetings (virtual or in person). At all times, management will be operating in one of three conditions:

- Normal: No severe weather hazards are being experienced, nor are they imminent. 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: Management has activated the Incident Command System structure and is actively engaged in response activities throughout one or more areas of the Companies.

The intent of the email, call and/or meeting, 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 communications tools will be used. The most common channels for communicating alert information include:

- Weather Forecasts: The contracted weather service provides specific forecast information for the Companies' service areas. When forecasted weather conditions exceed pre-determined limits (e.g., wind, precipitation, etc.) according to both the contracted weather service providers, email notifications are issued by the weather providers to the internal weather distribution list. The **Area Commander** and **Area Commander – Deputy,** will discuss the potential weather threat, areas impacted and begin strategic preparation planning, including executing the steps below.
    - Outreach to individual **Incident Commanders:** The **Area Commander** will contact **Incident Commanders i**f specific areas are targeted for potentially significant weather. Planning meetings may be held to discuss staffing, preparedness, communication strategies, and other preparation topics.

- Storm preparation meetings: Significant weather threats, or those with potential to impact a larger area, will prompt a meeting scheduled by the **Area Commander – Deputy** and all the potentially impacted **Incident Commanders**. Various preparedness activities and possibly staging strategies are typically discussed and determined.
- Corporate messages: Messaging throughout the Companies may be used to raise awareness for potentially significant events where activation of a large number of employees is anticipated. The **Assistant Area Commander – Public Information Officer,** is responsible for issuing these messages that typically put company-wide employees on notice that their participation in Incident Command System activities may be required.

Once a potentially severe weather event is identified, 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:

- Activating certain Area Command and Incident Command personnel;
- Continued weather monitoring;
- Continued preparation discussions and meetings;
- Assess availability of key resources;
- Assess possible 'packing and prepared to travel' or pre-staging resources to potentially impacted Divisions;
- Assess need/timing to open or keep open a Division office;
- Communicating with contractors and determining available resource levels;
- Placing contractors on notice, on standby, or staged at specific locations;
- Participate in North Atlantic Mutual Aid Group (NAMAG) New York Public/Private Utility Mutual Assistance Protocol (NYP/PUMA) or other related mutual aid conference calls.
- Contact motels, restaurants, fuel, and other services, as appropriate;
- Contact media and civic authorities, as appropriate and;
- At the Incident Command level, review of pre-selected staging/distribution sites and county/town priorities as provided prior to an event.

A pre-storm notification of Life Support Equipment and Special Needs Customers is discussed in Section 8.3.2: *Event Protocol for Life Support Equipment Customers* and Section 8.4: *Contacting Special Needs Customers.*

In addition to the protocol described above, **Area Commander**, **Area Commander – Deputy,** and **Incident Commanders** may also issue more frequent weather statements and bulletins to provide situational awareness of weather conditions that have the potential to adversely impact the system and our customers. The intent of these statements is to provide awareness to Incident command system teams and the larger employee population (as applicable) that a potentially severe weather situation is possible, and that monitoring and advance preparations may be warranted or underway.

The **Area Commander** maintains communications with various entities prior to potential events to monitor and evaluate threats and to make preparations. Calls that are typically held include;

- Area Command calls: Internal storm preparation conference calls with representation from lead Area Command and Incident Command personnel and business area leads. These calls are scheduled by the **Assistant Area Commander – Documentation** upon the request of the **Area Commander – Deputy** or designee.

  Topics to be discussed include. But are not limited to:

  - Current and anticipated weather conditions
  - Areas and the possible number of customers impacted
  - Crew assignments and movements
  - Safety issues and concerns
  - Review of regional perspective across the State including other companies
- Weather service conference calls: As appropriate, the **Area Commander – Deputy** or their designee will schedule meetings with the Companies' contract weather service provider to gather additional information regarding the forecast. These meetings are attended by the impacted Area and Incident Command Staff. Additionally, Area Command Staff may participate in National Weather Service (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 areas. These calls are conducted by the NWS in advance of and during major weather events.
- Mutual aid conference calls: The Companies are members of NAMAG and the Edison Electric Institute (EEI), and the New York Public/Private Utility Mutual Assistance Protocol (NYP/PUMA). The **MAG Liaison** works through the mutual assistance groups and other regional mutual aid organizations when acquiring and coordinating the release of mutual aid. Upon request from any member company seeking assistance, Area Command Staff participates in NAMAG, and NYP/PUMA conference calls in anticipation of and in response to an event, even if the Companies are not expected to be impacted by the associated event.

The Area Command and Incident Command System *Incident Action Plan* (IAP) is formalized by the **Area Commander** and the **Assistant Area Commander – Planning** beginning with event preparation to communicate incident objectives throughout the Incident Command System. The Incident Action Plan is developed at Area Command and disseminated to the activated **Incident Commanders** for each operational period during an event. Area Command maintains an Incident Action Plan template that shall be used. Similarly, the **Incident Commander** and **Planning Section Chief** will develop an Incident Action Plan at the Incident level based on the objectives of the Area Command Incident Action Plan. Until the Incident level Incident Action Plan is approved by the Area Commander, the division will operate under the Area Command Incident Action Plan.

Incident objectives provide guidance to the Incident Command System 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 the type of anticipated event, expected magnitude and duration, etc. (See Section 5: *Field Resources* for field resource staffing and Section 8.1: *Customer Contact Center* for customer representative staffing matrices.) The Incident Action Plan document is based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Objectives must be achievable and measurable, yet flexible enough to allow for strategic and tactical alternatives. Key objectives for the operational period can include but are not limited to; safety, pre-staging, proactive communications during the preparation phase, damage assessment, restoration, and communications during the restoration phase of an event. The Companies staff emergency events as necessary to maintain the Incident Command System structure in each area forecast to be impacted by the event.

The Incident Command Structure is typically activated during preparation by the **Area Commander**, **Area Commander – Deputy**, and **Incident Commander(s)**, although it is often further expanded as the event unfolds. Field personnel may be secured, assigned, and possibly staged as a part of the preparation phase. Company representatives may be assigned to county emergency management

offices, the State Office of Emergency Management (SOEM) bunker in Albany, and/or other municipal or regional locations upon request.

All Command Supervisors, when scheduling shifts, will take into consideration the anticipated event duration and magnitude. In general (and when possible), for events that are anticipated to last for more than 24 hours, the following duty rotations are appropriate:

- Personnel schedule: 17 hour on-duty and 7 hour off-duty; unless otherwise designated by the storm role supervisor or location (e.g., liaisons may be asked to serve 12-hour shifts).
- Assignment duration: Consider rotation and relief of active storm duty personnel, as needed, during longer duration events (e.g., exceeding 14 days).

The **Area Commander** and **Incident Commanders** identify and arrange staging areas on an event-by-event basis to best meet current needs. For large events impacting all or most of the Companies' service areas, one of the following centrally located staging areas may be used to strategically stage for neighboring Divisions while also allowing for flexibility to reallocate resources utilizing key Interstates: Mechanicville, Binghamton, and/or Rochester. Additionally, for the threat of events concentrated near the Great Lakes, Lancaster may be utilized. Likewise, for threats to predominantly just southeast NY, Brewster may be utilized as the strategic staging area. Otherwise, for Division specific threats and/or local impacts, local staging areas are utilized.

Customer contact and communications may be initiated by the **Assistant Area Commander – Public Information Officer** and Customer Needs as a part of the preparation phase. The **Assistant Area Commander – Public Information Officer** develops and distributes pre-event news releases are issued (and posted on social media) when weather forecasts indicate the potential for severe events that may result in loss of power. Outbound calls to Life Support Equipment, Special Needs Customers, and Critical Facilities may also be initiated by the **Critical Needs Branch Director** in the preparation phase to alert these customers of potential power outages and coordination with other utilities.

The Life Support Equipment outreach process is described in Section 8: *Customers*, *Public Officials, and Media*. The **Assistant Area Commander – Public Information Officer**, working with the **Customer Communications Coordinator,** may draft and send outbound emails using information derived from the news release to customers (for whom we have email addresses) in areas expected to be impacted for significant (Class II or III) events. Email addresses are maintained by the Customer Care Department in the Customer Relationship Management and Billing System; **Customer Care Center Representatives** gather email information during blue-sky interactions with customers.

Personnel in Area or Incident Command positions that require emergency event reporting will begin to produce reports and will distribute (emails) or upload (other documents) them in a timely fashion, in the proper format, and containing the necessary content. Reporting will continue until the end of the event or until reporting requirements are deactivated by the **Area Command Deputy** or designee. The reporting individuals are to ensure that reports provided are correct and suitable for use in regulatory reporting.

Upon completion of restoration, **Area Command Deputy** or designee will confirm whether Scorecard data and documents to produce a Part 105 Report will be required, based on the actual duration of restoration. If so, report production and uploading by Area and Incident command roles will continue after restoration is complete. **Emergency Preparedness** will produce the Scorecard package and/or the Part 105 Report for submittal to DPS Staff and ensure their appropriate review and approval, as either or both reports are needed. The **Assistant Area Command –**

Documentation and **Documentation Coordinators** will continue to monitor reports until **Assistant Area Command – Documentation** and **Documentation Coordinators** demobilization.

6.1 Coordination with Other Utilities

Telecommunication and cable personnel will have the ability to join Incident Command staff at the Companies' Division Emergency Operations Centers to coordinate priorities and restoration plans and share relevant system information prior to and during emergency periods. Communication and coordination with the telecommunications companies will begin in preparation for and during Class II events for situational awareness and/or for utility-specific impacts (e.g., a high number of broken poles).

In the first operating period after damage assessment has begun, representatives from telecommunications providers shall be requested by the **Incident Commander** or designee to co-locate in the Division (Emergency Operations Centers), if not co-located at the respective County Emergency Operations Centers.

If the telecommunication provider selects not to co-locate in a County EOC or with Company personnel, coordination shall be readily available through direct phone contact with the **Incident Commander** or their designee. If the event has exceeded or is expected to exceed more than 24 hours for 10 percent or more of customers affected in a division, a conference call may be arranged with the Incident Commander or their designee.

During an event for which Municipal Conference Calls are held and the county EOC locations are not open for discussion, the telephone, wireless, and cable TV suppliers will be invited to participate in a separate Telecom Conference Call by the **Incident Commander** or designee. These calls will follow the agenda below.

Telecommunication Provider Conference Call

- Introductions and protocols – **Incident Commander** or designee
- Weather Update – **Incident Commander**
- Number of outages, restorations, hardest hit areas – all
- Discussion of issues/concerns-all
- Contact information for the operational period – all

Topics and questions addressed may include; generator locations for telecom/cable facilities, and telecom/cable wires down. The **Incident Commander**, or designees will provide restoration status information to telecommunication company representatives on the call. Specific questions or needs by each of the telecommunication companies, which cannot be immediately addressed on the scheduled briefing call/meeting, will be referred to the local operations personnel, typically the **Incident Commander** or designee.

During an event when a coordination call is not held (i.e. telecommunications provider is co-located in the EOC), the telecommunication companies will address questions and needs for escalated repairs through the division office. The **Incident Commander** or designee will facilitate communications with telecommunication companies and our field personnel as needed. The **Incident Commander** or designee will also respond to questions including items such as those

discussed during the utility coordination section of the Telecommunication provider Conference Call/Meeting.

A list of telecommunication provider contact names and numbers to be invited to the calls/meetings is maintained by the local division offices in the division plans and also contained in Appendix G: *Utility Contact List* of this Plan. Telecommunication provider Conference Calls or meetings will continue to be held until the **Incident Commander** or designee agree that the calls/meetings are no longer necessary near the end of the event. Between scheduled calls, and after daily calls/meetings have been discontinued, the **Incident Commander** or designee will be the point of contact for telecommunication companies. Both the Emergency Preparedness Department or the **Public Liaison Officer** may also contact the **Incident Commander** or designee on behalf of a telecommunication representative for assistance.

Coordination with gas utilities includes pre-event notification when planning for forecasted events that have a high probability of causing flooding in affected service areas or other events that warrant coordination among NYSEG and RG&E electric and natural gas areas or between energy companies. As appropriate to the situation, additional discussions, including plans for coordinated restoration, may occur. Coordination with gas utilities will occur through a Unified Command structure if the event is within the Companies' service areas and/or through the **Public Liaison Officer** and **Liaisons County/Local** with other gas utilities in an Emergency Operations Center as appropriate. The Companies' Unified Gas Emergency Plan, filed annually by April 1, provides guidance for Incident Command System responders within the Company and is available on the Companies' *StormCenter* site.

Information to be shared between companies can include but not be limited to; crew locations, escalated repairs, outage information, downed wires, ETRs, corporate and local contact information, locations where one company's facilities are interfering with another's restoration, and telecommunication/cable company generator locations. Coordination of joint work with telephone and cable forces is handled through the division level **Field Circuit Coordinator**. The Companies will attempt to obtain assistance from telecommunications providers in replacing jointly owned poles.

The **Incident Commander** will designate the point of contact for coordination with other utilities. Contact points and the types of information exchanged may take the form of but not be limited to:

- Field supervisor coordination on a job specific basis
  - Job specific crew location and progress details
  - Local job-specific contact information
- **Incident Commander** coordination for regional support
  - Location of power interruptions
  - Discussion of specific critical facility status
  - Downed wires coordination
  - ETR detail regarding specific facilities
  - Local-level contact information
- Liaison contact at County Emergency Operations Center
  - County-wide ETR information
  - General contact point for specific requests
  - Corporate level contact information
- Liaison contact at the New York State Office of Emergency Management (SOEM) or other location as requested, communicate through the **Assistant Area Commander – Public Liaison Officer**
  - General contact for widespread progress status
  - Overall restoration coordination point

- Corporate level contact information

These coordinators and liaisons will initiate communications between the companies and coordinate restoration activities. Local utility contact information is included in each Division's *Emergency Restoration Plan* and updated annually.

Information can be exchanged between company representatives via telephone, e-mail, or by direct contact in an Emergency Operations Center. This information reporting shall be provided every three hours or on a mutually agreed-upon schedule for the specific event. When a County Emergency Operations Center is open and staffed by a Company **Liaison County/Local**, the preferred point of coordination will be at the County Emergency Operations Center.

For events that involve significant flooding or the threat of flooding, cooperation with the local gas company is recommended. Advanced planning and preparation by the **Area Commander** and **Area Commander – Deputy** is recommended to ensure an orderly de-energization of facilities. This can prevent equipment failure that may delay re-energization once floodwaters recede. Advanced planning to expedite re-energization may include the 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 re-energization process often at the direction of or in coordination with emergency services personnel (e.g., fire chiefs) will help to expedite service restoration. Actions may include setting up joint shut-off and re-entry teams.

If an event has more than one Company commodity impacted, such as a flood that affects electricity and natural gas services, the Company will adopt a Unified Command Structure, activating Area Command and **Incident Commanders** in Electric Operations and Gas Operations. Assistant Area Command staff will determine the scope of the event and may co-activate teams or expand teams with one lead as appropriate. This Unified Command Structure will be coordinated at Area Command, with the **Area Commanders** determining the appropriate leader for each phase of the restoration process. **Area Commanders** will hold joint Command staff meetings for situational awareness and to facilitate coordination. The **Area Commander – Deputy** will serve in both Command organizations to provide continuity.

Similarly, the Command staff will also coordinate with external parties through the shared Incident Command Structure to facilitate return to normal operations, through State, Regional, County, the Companies' Emergency Operations Centers, or other companies' Emergency Operations Centers as appropriate.

6.2 Coordination with Mutual Aid Companies and Contractors

Assistant Area Commander – Planning will be responsible for securing mutual aid and contract resources at the request of the **Area Commander**. The types of resource groups that could be requested include but are not limited to:

- Mutual Aid Utility Line Crews
- Contract Utility Line Crews
- Vegetation Management Crews
- Damage Assessors
- Wire Guards

The Companies are members of the *North Atlantic Mutual Assistance Group* (NAMAG). Member companies of NAMAG are required to follow the established procedures regarding the acquisition

and supply of mutual aid resources. When additional resource needs are anticipated by the **Area Commander** and **Assistant Area Commander – Planning**, requests for assistance will be made through this *Regional Mutual Assistance Group* (RMAG). The **Mutual Assistance Group Liaison (MAG Liaison)** will participate in conference calls, discussions, meetings, and exercises conducted by this group throughout the year.

Once it is determined that external resources are required, the mutual assistance process will be implemented consistent with the "North Atlantic Mutual Assistance Group Guidelines" as follows:

- The requesting company(s) shall initiate an RMAG / Joint Mobilization Conference Call.
- The weather forecast shall be presented by the requesting company(s) to provide all members an opportunity to understand the emergency situation.
- An estimate of actual or predicted impact/damage and when these are expected to occur shall be presented by the requesting company(s).
- An estimate of resources needed shall be presented by the requesting company(s).
- All non-impacted companies shall state the numbers of resources available to assist once their service areas are no longer at risk.

Requests for mutual assistance for the Companies are coordinated by the **MAG Liaison**. The **MAG Liaison** serves as the contact point responsible for ordering and notifying the sending utility that their resources are no longer required.

NYSEG and RG&E are members of the *New York Public Private Utility Mutual Assistance Protocol* (NYP/PUMA) and will actively engage in all required activities and follow established procedures with this organization.

MAG Liaison will request a NAMAG and a NYP/PUMA planning call prior to events where external resource needs are anticipated.

6.2.1 Pre-Event Resource Availability Assessment

The **Sr. Director – Electric Operations Distribution** or designee will contact all on-property contractors at the start of every work week. Additionally, when appropriate the **Vice President-Reliability Assurance and Emergency Preparedness** or designee will review storm resource staging needs, to determine availability across the Companies affiliate locations, prior to any elevated threat levels to verify at the request of the **Area Commander.** The **Contractor Coordinator** will contact additional (non-investor utility affiliated) contractors as needed to raise awareness regarding a predicted event and to verify resource availability when instructed by **Assistant Area Commander – Planning** or **Area Commander**.

When in an event planning phase, the **Assistant Area Commander – Planning** will work with the **Area** and/or **Incident Commanders, Contractor Coordinators**, and **Vegetation Management Coordinators/Vegetation Management Branch Directors** to confirm all on-site available line and vegetation resources, which will be compiled in the Resource Summary Report. This report will be provided to the **Area Commander**, **Area Commander – Deputy**, **Vegetation Management Coordinator**, **Assistant Area Commander – Planning,** members not on the call**,** on duty **Contractor Coordinator, MAG Liaisons,** and other business area leads as requested.

The **Area Commander** and **Assistant Area Commander – Planning** will consult the Resource Summary Report to determine the location of available resources compared to the site of potential event impact. Resource counts, drive time, and travel conditions will be considered. The resource

data will be factored into any prediction modeling results, the review of previous events, general experience, and system knowledge. Additionally, the availability of resources at Avangrid affiliates will be considered. The **Area Commander** will consider resources detailed in Section 7.1.1: *Activation*, and Figure 8. *Resource Activation*, shown below.

Estimated Number of Incidents	Line Worker Full Time Equivalents (FTEs) At four crew hours per incident (normal storms)	FTEs at eight crew hours per incident (hazardous travel, e.g., ice or snow conditions)
< 50 incidents	26	50
50 - 100	50	100
100 - 150	76	150
150 - 200	100	200
200 - 250	126	250
250 -300	150	300
> 300 incidents	176	350+

Figure 8: Minimum Resource Activation

6.2.2 Event Response Resource Management

At the direction of the **Assistant Area Commander – Planning**, the **Contractor Coordinator** will contact contractors as needed to fulfill resource requests that are approved by the **Area Commander**. Resources shall generally be acquired in a manner that allows commitments to be made to the closest geographic proximity, most available contractors. Other considerations can include costs, past performance, and whether the contractor is currently working on the system and adding additional crews to its current compliment. Contractor commitments shall generally be made in the following order:

- On-site contractors (native)
- Contractors able to be on-site within 24 hours
- Contractors able to be on-site between 24 and 48 hours
- Contractors able to be on-site beyond 48 hours

The **Contractor Coordinator** will make additional contact with contractors when anticipated resources required may not be met with onsite personnel, contractors, and mutual aid. The determination of additional resources will be made by the **Area Commander** or designee.

At the direction of the **Area Commander** or **Assistant Area Commander – Planning,** the **MAG Liaison** shall make a request for resources from the mutual assistance organizations on behalf of NYSEG and RG&E. The **MAG Liaison** will advise the mutual assistance organizations' leadership of the following information:

- Number of transmission or distribution line full-time equivalents (FTEs) requested
- Number of Vegetation Management FTEs requested
- Number of other resources (e.g., **Damage Assessors**, **Wire Guards**) requested

- Requested time of arrival for any resources offered

The **Contractor Coordinator** and **Resource Tracking Coordinator** will coordinate receiving all resource rosters and entering them into the Companies tracking system. Resources will be assigned in this tracking system to the area receiving the resources by the **Resource Tracking Coordinator** or designee.

A listing used for securing companies for damage assessment, wire guarding, and vegetation management can be found in Appendix D: *Contractor List.*

7. RESTORATION

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

1. Initial Impact Phase Includes activation, make safe, and assessment activities. Initialization of the Incident Command System Area Command / Incident Command**,** the commencement of make-safe activities, and damage assessment.
2. Repair and Restoration Phase: Restoration of circuits through a combination of permanent and temporary system repairs.
3. Final Phase: Includes circuit sweeps and demobilization; identification and repair of any remaining system damage, identification of temporary repairs that require additional work to finalize, demobilization of resources as they complete work, and documentation of system status.

Information on power interruptions, as well as ETRs, and weather/device/cause codes, are tracked in the Outage Management System as the system of record and sent to other systems such as the Customer Service Customer Care System, integrated voice response (IVR) unit, and Company websites real-time via interfaces. In some cases, crews in the field are able to enter updates to dispatched power interruptions using mobile units. Activities associated are as follows:

Interruption Initiation

- Automatically populated by the OMS system, manually entered during emergency events by Energy Control Center staff or the **Circuit Information Coordinato**r (the latter if the Companies have decentralized operations).
- Via interface with the Customer Care System for the IVR and website.

Initial ETR/Assessing Flag – Centralized Operations

- A default ETR is automatically populated or manually entered by Energy Control Center personnel.
- The ETR will be updated in OMS by crew via interface with mobile units or manually by Energy Control Center if called in by crew; Energy Control Center monitors ETRs for accuracy, contacting crew for updates as needed.
- For larger Class II or III events, the **OMS/ETR Coordinator** will monitor web and IVR to spot check that ETRs are publishing accurately.

Initial ETR/Assessing Flag – Decentralized Operations

- Assessing flag is automatically set in OMS.
- If a global or regional ETR is set, it is entered in OMS by the **OMS – ETR Branch Director** or designee when the crew has an updated ETR, the **OMS – ETR Branch Director** or designee updates the ETR.

- The **OMS – ETR Branch Director** or designee monitors the ETR for accuracy, contacting crews for updates as needed.
- ETRs populated will be reflected in the IVR and public website via interface, included in iCDS reports for all Command Staff.
- The **OMS/ETR Coordinator** will monitor the web and IVR to spot check that ETRs are publishing accurately.
- The **Damage Assessors** are trained to use their assessment devices (typically tablets) to enter information, even when outside of cell coverage, as the **Damage Assessor** will submit the data once within cellular service coverage.

Power Interruptions Closed in OMS – Centralized and Decentralized Operations

- Closed in OMS by crew via interface with mobile units
- Manually by Energy Control Center or **Circuit Information Coordinator** if called in by crew
- Outage details sent to Electric Reliability Application (ERA), iCDS, IVR, text alert system and website
- Electric Operations personnel will monitor to ensure outages are closed in the system(s).

7.1 Initial Phase

In the initial phase, activation, make safe and assessment activities will be undertaken; some restoration may occur, as the Companies are able to sectionalize or limit the interruption impacts. This section will detail the activities during this phase. The Companies will stay in regular communication with customers; State, regional county and local officials, and the media, as described in Section 8*: Customers, Public Officials, and Media*.

7.1.1 Activation

The initial phase involves notifying emergency personnel that damage to Company facilities has or is likely to occur. The **Area** or **Incident Commander** (as appropriate) activates necessary personnel who report to their emergency work locations (as assigned during activation). Consistent with the Incident Command System guidelines, the Area and Incident Command System is a flexible structure that will expand or contract as appropriate for the scale and severity of the event. For example, as discussed in Section 3*: Event Classification*, an isolated Class I event may require that a limited Incident Command Structure be established in one Division. A Class III system event will likely require the **Area Commander** to activate and for several **Incident Commanders** to be active.

The Companies have an Area Command Emergency Operations and will centralize Command staff in anticipation of or during events as ordered by the **Area Commander** or designee. Each Incident Command location (typically a Division office) has designated Incident Command room(s) for event response. The Companies also have mobile command centers available for deployment.

For local emergencies, channels of communication and field operations will be coordinated from local emergency command centers that would be located in the respective NYSEG and RG&E service territories, and that, for emergencies of wider company impact, the Area Command Section will be located in the service territory and may be activated, as appropriate. If it is not possible to comply with this requirement then the Area Commander or their designee shall ensure that the DPS Director of the Office of Resilience, Utility Security, Nuclear Affairs and Emergency Preparedness or designee is notified of the location of these functional groups.

Once a division is affected and the **Incident Commander** reasonably anticipates that the impact and restoration phases will require a work rotation, the **Incident Commander** will contact the **Area Commander** and the **Area Commander** will declare system emergency for the respective company. **Area** and **Incident Commanders** will then decide on the level of activation for additional ICS roles. The Area command staff distribution list will be utilized to notify all functional areas that an operating company has declared that it is in a system emergency. The Area Command staff distribution will be maintained by the **Area Commander** or designee, working from the established Area Command Organization Chart and ICS Storm Roles master list.

The **Logistics Section Chief** is responsible for supporting the local Incident Command staff by providing all service, support, and supplies needed during the event. This may be done in coordination with the **IT Coordinator** for telecommunications or computer equipment. The **Logistics Section Chief** ensures accessibility of lodging, meals, material, transportation, and dry ice distribution.

The **Assistant Area Commander – Public Liaison Officer,** or if a Class I event, the **Public Liaison Officer** or designee is responsible for having Company representatives staff the County Emergency Operations Centers; the **Incident Commander** or designee is responsible keep these employees informed of restoration status.

With any event activation, the **MAG Liaison** will be put on notice by the **Area Commander** or designee to ensure readiness for mutual assistance outreach. The **MAG Liaison** and those engaged in resource activation will consult Section 6.2: *Coordination with Mutual Aid Companies and Contractors* for further details.

7.1.1.1 Area Command Situational Awareness Meetings

Situational awareness meetings, usually conference calls, are conducted as requested by the **Area Commander** or designee and scheduled by the **Assistant Area Commander – Documentation**. The purpose of these calls is typically to discuss status, identify and address issues, and to identify and address resource needs or gaps. Topics may include, but are not limited to:

- Weather,
- Crewing,
- Safety concerns,
- Damage assessment,
- Materials, availability,
- Restoration status,
- Recent communications, both internal and external.

7.1.1.2 Coordination of Activities and Additional Line Resources

Each **Incident Commander** is responsible for planning and directing restoration activity in their respective area. When the local Incident Command requires additional resources beyond their control, a request will then be submitted to the **Area Commander** or **Assistant Area Commander – Planning** for additional support.

The **Assistant Area Commander – Planning** or designee will coordinate mutual aid resources. Requests for aid and crew transfers between companies will be coordinated by the **Assistant Area Commander – Planning** or designee after consultation with the **Area Commander**. The **Contractor Coordinator** will obtain rosters from the responding companies and will compile a list of all contract

and mutual aid personnel on the property. The **Contractor Coordinator** or designee will maintain and update this list throughout the event. This list will then be communicated to the Logistics Section, particularly the **Food and Lodging Coordinator,** Incident Command level **Logistics Section Chief** so that arrangements can be made for food and lodging in the proper location, and **Resource Tracking Coordinator**.

Upon arrival at the designated location, each mutual aid contractor will be given onboarding information and receive a safety briefing by the **Safety Officer** or designee. This would include contract **Damage Assessors**, contract **Wire Guards,** and contract flaggers in addition to the line and vegetation resources. Given by the **Safety Officer** or designee (typically an **Operations Section Chief** or other skilled personnel), the safety briefing will include the applicable sections as follows:

1. General personal protective equipment
2. Accident reporting process
3. General operating voltages
4. Requirement for daily or (as tasks change) job briefing
5. Traffic control requirements
6. Tagging and switching contacts
7. Reporting of oil spills
8. Local Hospital and Urgent Care Facilities listing

Contract workers already working on the property, such as contractors performing regular construction work, who already have this information from pre-event briefings may receive abbreviated, event-specific information.

Crew resources will be assigned to each Division by the **Assistant Area Commander – Planning** or designee with input from the **Area Commander**. Crew resources are generally distributed to the Division based on the number of outage locations, and the extent of the damage. However, the formula for resource assignment is unique to each event, and criteria can change throughout the duration of the event (for example, knowledge of significant events or circumstances in an affected area, differences in population, such as seasonal populations, etc.). Daily internal status meetings are the basis for adjustments in crewing levels and assignments.

The **Operations Section Chief** will designate the most beneficial location in which the crew foremen will receive their work packets. This may include hotels, staging sites, or local division office, whichever is most efficient. **Field Circuit Coordinators** will provide job briefings to mutual assistance and contractor crews at the work locations or other locations as appropriate. **Field Support Runners** or other personnel may be used to deliver packets when appropriate.

The **Operations Section Chief** will have field crews report directly to their assigned work location after receiving job briefings, in consideration of union rules and logistics. To improve system updates and customer information, the **Incident Commander** in conjunction with the **Area Commander** can deploy a **Circuit Information Coordinator** or designee to a remote command site (i.e. in a division with widespread damage to facilitate communication with crews). Remote command sites must be flexible and can be a control house, mobile command trailers, vehicles or any other suitable location with the appropriate telecommunication service. In general, the site is located in an area with one or more circuits with considerable damage and must have cellular service. The **Circuit Information Coordinator** can receive direct information and updates from the crews assigned to and responding to ET tickets and outages in that area. The **Circuit Information Coordinator** is able to update ETRs and close tickets in the OMS system without having to call back into the division office which can add to congestion on phone and radio traffic.

The **Logistics Section Chief** or designee will check in all personnel as they arrive at the Incident Command location. The **Logistics Section Chief** or designee in each area will keep accurate records of all non-company personnel working in their area during the event and ensure that the Operations Section are keeping proper time logs for their crews.

The **Incident Commander** or designee often with the **Public Liaison Officer** or designee will coordinate local response activities with the efforts of particular county or town emergency response agencies, municipal officials and departments, and first responders. Local contacts will be made by the **Public Liaison Officer** or designee and maintained throughout the event to coordinate response efforts and to assure restoration priorities are being satisfied. The **Public Information Officer** or designee will issue communications to notify the public on restoration efforts. For further information, see Section 8.7: *Public and Emergency Management Officials and Media Contacts.*

Contact will be made and maintained with the Department of Public Service (DPS) Staff and, if necessary, other state officials, including but not limited to Department of Homeland Security and Emergency Services (DHSES) and State and/or County Emergency Operations Centers by the **Area Commander – Deputy** (or designee) or Public Liaison Office.

The Companies, through the **Area Commander** and **Area Command – Deputy,** may determine to prepare internal crews and support staff and/or secure mutual aid from affiliate companies, other utilities, municipal electric entities and/or contractors to be deployed; this process is detailed in Section 5: *Field Resources*, particularly Subsection 5.3: *Line and Service Crews, Mutual Assistance.*

7.1.1.3 OMS Management

During events, the Outage Management System (OMS) is used to identify interruption locations, dispatch crews, record restoration information, and produce various outage update reports. Estimated Times of Restoration (ETRs) and updates are entered into the OMS by the **OMS/ETR Branch Director** or designee. The OMS system in turn feeds the Company's customer information system (SAP). Restoration information is automatically shared with customers who call the Customer Contact Centers' interactive voice response (IVR) system or use the Companies' websites from SAP.

Members of Area and Incident Command staff can access outage detail and incorporate the information into communications for internal use.

- The OMS is a critical system every day and particularly during severe weather events.
- The **Manager – Applications** from Operational SmartGrids, or designee, will design, plan, and execute an OMS stress test, which will occur in a test environment, prior to June 1 ahead of hurricane season.
- A significant or major system change to the OMS after June 1, will require a second stress test within 90 calendar days of the major system change implementation.
- Stress testing will simulate the peak trouble order volume that would occur during a hypothetical storm that affects 90% of customers over a 24-hour period on the overhead distribution system.
- Within 20 business days of each stress test, the **Vice President-Reliability Assurance and Emergency Preparedness**, or designee, will submit a report to the DPS Director of the Office of Resilience and Emergency Preparedness, or designee, that contains the detailed results that support either a passing or failing grade.

- In the event of a failed stress test, the **Manager – Applications** will develop a remediation plan that may require outside consultants. The **Vice President-Reliability Assurance and Emergency Preparedness, or designee,** will submit the remediation plan to the DPS Director of the Office of Resilience and Emergency Preparedness, or designee, within 30 calendar days. A re-test will take place within 90 calendar days. If the test cannot be completed in 90 calendar days, the **Vice President-Reliability Assurance and Emergency Preparedness** or designee will notify DPS Director of Resilience, Utility Security, Nuclear Affairs and Emergency Preparedness or designee when the test will occur.

In the event of an OMS failure, the Back-up Outage Management System is used. Company personnel have a documented procedure provided to the Energy Control Center staff to initiate as needed. Company personnel in the ECC and Call Center receive guidelines and are exercised at minimum every three years on the use of the Back-up Outage Management System. In the event of a loss of all technology, the **Sr. Director-Energy Control Centers** or designee would enact their business continuity plans.

The IT Coordinator and Operations Technology Group will monitor system availability during an event. If critical systems are unavailable, they will contact the **Area Commander – Deputy** to report the system interruption. The **Area Commander – Deputy,** will coordinate internal and external communications within the Area Command team:

- The **Assistant Area Commander – Public Information Officer** will be responsible for coordinating internal and external messaging to the website and employees (such as posting a pop-up banner or other messages on the website and issuing an employee email alert).
- The **Assistant Area Commander – Customer Needs** will be responsible for providing developed messaging for customers (such as messages on the IVR to identify the deficiency and alternate ways to reach the affected Company or calls to Special Needs Customers if warranted).

Message templates can be found in Appendix A: *Additional Material.*

7.1.1.4 Electric Outage Reporting to PSC/SOEM

The Electric Outage Reporting System (EORS) has been developed by DPS Staff for the Companies to communicate electric outage data, including restoration progress, in a timely and consistent format. Information compiled in the reporting system is used by DPS to monitor utility progress and to inform other agencies of response status.

The Emergency Preparedness Department is responsible for the submission of data as required by all New York utilities for restoration activities expected to exceed 48 hours or as requested by DPS Staff. Components of the EORS include but are not limited to:

- Utility information,
- Summary of the outage event, for major storms, summarize the weather and weather forecast,
- Summary of outages,
- Synopsis - a discussion of major damage and work plans for restoring customers,
- ETRs,
- Resource summary - on-site and en-route, planned crew relocation and mutual assistance activity,
- Summary of the impacts to critical facility customers and Life Support Equipment customers and,
- Dry ice/bottled water activities.

Once EORS reporting has been activated by DPS Staff, EORS reports are to be submitted by the Emergency Preparedness Department at 7 am, 11 am, 3 pm, and 7 pm unless otherwise directed by DPS Staff. Templates provided by DPS Staff will be used to report information. Outage data includes a breakdown of customers interrupted by geographic area, along with ETRs. Crew assignment data includes a breakdown of Company and non-Company line, tree and service crews utilized for response efforts by Company 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.

EORS report submissions may qualify as a notification to DPS Staff of ETR being set, provided they contain the required information within the appropriate timeframe. Utilities, however, may need to make notifications to DPS Staff, in addition to report submissions early in an outage event to satisfy the guidelines.

In addition, the Companies, together with other New York utilities, are participating in an automated process that provides outage information to DPS Staff every 30 minutes on an ongoing basis.

7.1.1.5 Finance

The purpose of the Finance Section is to estimate potential storm costs as a storm event is monitored, and to acquire, set up and/or assign appropriate resources, procedures and personnel to most effectively deal with and function under the anticipated storm emergency conditions (within the Finance storm support function).

When the **Area Commander** receives information that indicates the likelihood of a major storm in NYSEG and/or RG&E's service area(s), the **Area Commander** will notify the Area Command staff of the Companies preparations and potential plan activation. At that time, the **Assistant Area Commander – Finance** will initiate steps to prepare for the event, including creating cost collectors, and ensuring work order availability for internal time-charging. Additionally, **Assistant Area Commander – Finance** will work with the Area Commander, **Assistant Area Commander - Planning** and/or the Emergency Preparedness Department to review resource details to create estimates for events.

The Finance team will monitor resource issues and concerns and remain informed of any potential cost impacts to the organization. Storm accounting information will be communicated accordingly.

7.1.2 Logistics

Reporting to the **Assistant Area Commander – Logistics** is the **Stores Coordinator**, **Fleet Coordinator**, **Facilities Coordinator**, **Food and Lodging Coordinator**, and the **Dry Ice/Bottled Water Coordinator**. The **Assistant Area Commander – Logistics** has the ability to activate any of these positions as necessary during an event. Lodging contact listings are to be maintained continuously throughout the event by the **Food and Lodging Coordinator.**

The **Dry Ice/Bottled Water Coordinator** at the Area Command level and a **Dry Ice Bottled Water Unit Leader** at the Incident Command level are responsible for the coordination of activities related to dry ice acquisition and distribution. See Section 8.6: *Providing Dry Ice and/or Bottled Water* for further information.

The Fleet Coordinator at Area Command and the **Fleet Unit Leader** at Incident Command are responsible for obtaining and maintaining vehicles needed in the storm response. The responsibilities include:

- Providing situational awareness and coordination amongst **Fleet Unit Leaders**.
- Coordinating and expediting vehicle repairs.
- Arranging for fueling of vehicles including mutual aid and contract crew trucks, preferably occurring during overnight to optimize daylight restoration activities.

The **Facilities Coordinator** at Area Command and **Facilities Unit Leader** at Incident Command are responsible for the day-to-day facility maintenance services (sanitation, lighting, clean up) in buildings being used during restoration efforts.

The **Stores Coordinator** at Area Command and the **Stores Unit Leader** at Incident Command will coordinate the delivery of poles and other materials as requested by the **Pole Setting Branch Director** or **Operations Section Chief;** responsibilities include:

- Replenishing materials in Division storerooms.
- Support in the coordination of delivering poles to job sites.
- Providing Material and Personal Protection Equipment from secured stock at the request of the **Operations Section Chief** or designee.

7.1.3 Response: Preemptive Power Shutdown due to flooding

The Companies may shut down power to protect the electric system when directed by the NY Independent System Operation or during adverse weather conditions, such as periods of flooding. The **System Operators – Energy Control Center** monitor weather forecasts for information during heavy rain events. The **Managers – Substation Operations** are notified by the **System Operators – Energy Control Center** of the conditions. Once the weather conditions are received, the **Managers – Substation Operations** or designees then notify the **Area Commander**.

Actions taken will be communicated until the threat of flooding has subsided. The monitoring of the flooding by the **Area Commander** or designee and the **Managers – Substation Operations** includes accessing several agency websites for current weather and flooding conditions. The **Area Commander** will consult with **Incident Commanders** (either **Managers – Substation Operations or Managers – Regional Electric Operations**) who coordinate with the **System Operators – Energy Control Center** to dispatch personnel to monitor flood levels. **Substation Operations Field Personnel** are deployed by the **Managers – Substation Operations** to the substation(s) located in the flood-prone areas to further monitor flood levels. The lists of these locations are held at the Division offices.

The **System Operators- Energy Control Center (SO-ECC)** will monitor National Weather Service (NWS) and other weather forecast service providers' weather forecast information for heavy rain events. The NWS Advanced Hydrologic Prediction Service web site provides current and forecasted river and lake levels and indicates the potential for either (i) No Flooding; (ii) Near Flood Stage; (iii) Minor Flooding; (iv) Moderate Flooding; or (v) Major Flooding on rivers, lakes and reservoirs. Historical flood information is also provided, showing details for past flooding events. The potential flooding impacts are discussed in a meeting that may include and not be limited to; **Area Commander, Energy Control Center Managers for Gas and Electric, Managers – Substation Operations, Area Commander – Deputy**, **Incident Commanders** (in affected areas), **Area Commander – Gas Operations**, Facilities, and others as necessary.

Depending on the substation location and transmission and distribution system configuration, certain site specific, pre-emptive actions may be taken before the storm begins and/or prior to the major flooding occurring, can include:

- Dispatching **Substation Operations** (**Sub Ops**) field personnel to the substation(s) located in the flood-prone areas enables personnel to further monitor flood levels in or near the substation(s).

- Installation of flood barriers (e.g., sand bagging), where feasible, around the substation site, fence, control building, and/or specific equipment.

- Installation of a mobile substation, where feasible, in a specific predetermined location, to maintain service to the customers supplied from the substation

- Preparation of pre-determined transmission and/or distribution system switching to tie distribution circuits to maintain service to the customers supplied from the substation, from an alternate source

The **Area Commander** or designee will activate and engage the appropriate Command staff to ensure that communications to public officials, emergency management offices, DPS Staff, Critical Facilities, and customers are completed. These roles include the **Area Commander – Deputy** and the **Assistant Area Commanders – Customer Needs**, **Public Information,** and **Public Liaison Officers**.

Incident Command staff (the Public Liaison Officer or designee) will participate in County Emergency Management planning meetings as required. If either Electric or Gas Company is outside of Avangrid Networks it is anticipated they would participate at the County level as well. If not, contact will be made locally via the respective local **Incident Commander**.

7.1.4 Decentralization

Centralized Operations

Under normal blue-sky conditions, Energy Control Center-New York (ECC-NY) maintains jurisdiction over all transmission systems at NYSEG and RG&E including 11kV/34.5kV sub-transmission systems in RG&E. OMS is maintained by ECC-NY for all areas.

ECC-NY maintains jurisdiction over distribution systems at RG&E-Canandaigua and RG&E-Central divisions.

RG&E-Fillmore and RG&E-Lakeshore maintain local operating jurisdiction over distribution systems. All NYSEG Divisions maintain operating jurisdiction over distribution systems.

Decentralized - Office/Division Opening

During times of widespread power outages or when the trouble and outage workload dictates, the ECC-NY will request the division office to open and implement local ICS structure. The decision to open an office will be decided between the **Sr. Director-Energy Control Centers** or designee and the **Manager of Regional Operations** or designee.

ECC-NY will continue to dispatch and maintain OMS system data until division personnel are in place and declared "open."

RG&E-Lakeshore and RG&E-Fillmore will take on the added responsibility of the OMS system management, including updating and closing tickets, crew dispatch and circuit operations; they currently hold operating jurisdiction of distribution circuits in their respective areas.

All NYSEG Divisions take on the added responsibility of OMS system management, including updating and closing tickets, and crew dispatch in their respective areas. They currently hold operating jurisdiction of distribution circuits in their respective areas.

Decentralized - Jurisdiction Transfer

The decision to transfer jurisdiction of distribution circuits for RG&E-Central and RG&E-Canandaigua to field operating personnel (Division Operating Entities/Incident Commander) to more efficiently and safely restore customer power is agreed between ECC-NY and the Incident Commander or designee.

The Incident Commander or designee will perform the following checks:

- Review OMS or the circuit maps to determine the extent of those distribution circuit configurations and topologies by performing one of the following as necessary:
    - Review OMS or Circuit Maps
    - Request ECC review and report the last known configuration if necessary
    - Field Verify
        - Physically verify normal tie points are open
        - Check devices (switches, reclosers, schemes) that are the boundaries to other energized circuit portions or other circuits to ensure boundaries.
    - Check for any other circuit anomalies that could impact safety
    - Review OMS or a list of trouble and outage reports (Electric Incident, Electric Trouble) to be aware of existing trouble areas and damage
- Perform circuit patrols of the outage areas to find, isolate and tag, repair and energize line sections to restore as many circuit portions as possible.
- Record each switching device operation and energization time to report to the Field Circuit Coordinator or Division Operating Entity
- Record any instances of two or three phase conductors that were down and were repaired for future phase checks

The Field Circuit Coordinator or Division Operating Entity will maintain situational awareness of circuit status and record applicable restoration times including:

- Open/Close Times
- Circuit number, road, pole, switch number, number of cutouts, etc.
- Cause codes
- Report all information at the specified times or complete jobs in OMS

Circuit Monitoring/Dispatch:

- The Division Operating Entity shall monitor all circuits under their jurisdiction for new outages and trouble jobs via OMS and dispatch or communicate to individual crews as necessary

- Fire/ 911 calls related to circuits where jurisdiction has been transferred shall be communicated to the Division Operating Entity at RG&E by the ECC-NY or managed by 911 phones transferred to the applicable division for NYSEG

Centralized Operations - Office/Division Closing – Jurisdiction Transfer

When ready, operating jurisdiction of the distribution circuits and/or the dispatch responsibility can be transferred to the ECC-NY.

The decision to close an office will be decided between **Sr. Director-Energy Control Centers** or designee and the **Manager of Regional Operations** or designee.

ECC-NY will receive jurisdiction of the distribution circuits from the applicable area. A listing of the circuits shall be agreed between the two entities (ECC-NY and Division Operating Entity) and the transfer time shall be recorded. This transfer includes the monitoring of OMS and dispatch of crews.

ECC-NY shall perform a review of the circuit and trouble incident statues by performing the steps noted in the Decentralized section Incident Commander checks above, only as necessary.

Note: The scope of the returning dispatch function may be limited as decided between the **Sr. Director-Energy Control Centers** and the **Manager of Regional Operations** (emergency only, etc.) as needed for the event scenario.

7.1.5 Make Safe

Make safe efforts involve the classification and clearing of wires down and other hazards that may occur during storm events. The make safe process is in conjunction with the Incident Command System/National Incident Management order of core priorities: life safety, incident stabilization, and property preservation. Specifically, wires down calls will be prioritized based on potential danger, e.g., wires down on occupied vehicle or near a populated area and/or determined as energized (arcing and burning). Resources are dispatched by the **Operations Section Chief** or designee to identify and verify if the wires are energized or de-energized; and if energized, they are then made safe 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[1] or reestablishing access to Critical Facilities are included in the prioritization within the 'make safe' process. Road Clearing Crews are an integral part of this collaborative process, further explained below.

Road Clearing Crews
At the request of the **Area or Incident Commander**:
The **Operations Section Chief** will be responsible for the following;

- Notification, activation and mobilization at all levels of the Incident Command System, (ICS) to manage and support make safe and road clearing activities.
- Coordination with the **Public Liaison Officer (PLO)** assigned to Incident Command. When requested coordinate with the **PLO** to have them assign a **Liaison (County and Local)** resources to County Emergency Management Offices (usually town offices for Westchester County) to obtain road closure information when the hazard is caused by electrical

infrastructure (impassable roads impacted by wires down or other electrical equipment e.g. poles, transformers).
    - **Liaison (County and Local)** Officer - when requested by a County Emergency Management Director will report to the appropriate EOC and act as a liaison between the County, the local **Incident Commander** and the **PLO.**
    - The **Operations Section Chief** will designate a **Utility Field Coordinator** to serve as the designated lead for line and tree resources provided to a municipality or other external task force focused on road clearing. This resource may be located in the field or report to an EOC.

- The **Utility Field Coordinator** will serve as a point of contact for the **PLO** and/or **Liaison (County and Local)** and **Operations Section Chief**.
- The **Operations Section Chief** will;
    - Brief the **Incident Commander** and **PLO** and arrange for tactics meeting when deemed necessary
    - Integrate information into the preliminary damage assessment routes to minimize delays
    - Provide situational awareness to the **Incident Commander, PLO, Operations Section Chief** and **Wires Down Branch Director**.

The **Operations Section Chief** will evaluate the priority roads provided by the Emergency Operations Centers and Local municipalities and determine the appropriate approach.
The **Incident Commander** or designee will:

- Evaluate resources required to clear wires down impeding road clearing activities
- Review available external resources with the **Public Liaison Officer** and communicate requests for support to meet prioritization efforts to local and/or state EOCs as needed
- Direct the integration when appropriate of other local, county, state, and federal response partners such as the Department of Transportation, Thruway Authority, State Police and National Guard
- Establish road clearing crews with either internal or external resources, ensuring that line and tree crews are properly aligned to support make safe activities.
- Ensure make safe utility and tree crews have sufficient tools to test and remove downed electric cables and debris.
- Set up Unified Command Structure if needed with impacted counties and towns

Public Liaison Officer and/or **Liaison (County and Local)** as applicable will report progress to applicable County Emergency Management Officials and/or the State Emergency Management Agency as agreed upon or as warranted. The **Public Liaison Officer** will also stay in contact with the other liaison officers deployed in the state and county emergency operations centers.

Once the wires are cleared and/or made safe, the municipalities can then enter to remove debris and open the road. The **Public Liaison Officer** or designee will coordinate participation in road clearing task forces through the County Emergency Operations Centers and other relevant agencies. A **Utility Field Coordinator** will be assigned by the **Operations Section Chief** or designee as an assigned lead for the line and tree resources provided. The **Utility Field Coordinator** will ensure proper alignment and communication between the line and tree crews assigned to the municipality.

Wires down are classified as electric trouble (ET) and tracked as ETs within the Companies' OMS. The **Wires Down Branch Director** is also provided with information from other sources regarding device status on the system (e.g., circuit breakers open at a specific substation). The **Wires Down Branch Director** uses all of these information sources to coordinate and manage wires down

response, as described in Section 5*: Field Resources*. In addition to OMS, information from other sources is also incorporated into the wires down management process.

Make safe priorities follow a process jointly agreed to among New York State electric utilities. The utilities have agreed upon this common prioritization process in order to establish a common coordination protocol with the various local, county, and state agencies. Municipal reports of wires down will follow Case 13-E-0140 – *Proceeding on Motion of the Commission to Consider Utility Emergency Performance Metrics* protocols to promptly secure downed wires within thirty-six hours of start of restoration for events lasting five days or longer.

In Class III or large events where there are significant numbers of wires down, the **Incident Commander** will assign make safe crews qualified to clear an electrical hazard as a high-level priority relative to other restoration efforts. This further emphasizes the order of Incident command system/National Incident Management System core priorities of life safety, incident stabilization, and property preservation. Section 7.1.5.1 contains information on priorities and guidelines on make safe crew compliments for a large event.

The **Wires Down Branch Director** manages the assignment and tracking of make safe resources (make safe crews and wire guards) and tracks the resolution of wires down from initial report through to completion. The **Wires Down Branch Director** will coordinate with the Operations Section to avoid being dispatched to an area that is or has been addressed. The specific emergency response roles for make safe **Line Crews** and **Wire Guards** are provided in Section 5: *Field Resources.*

7.1.5.1 Wire Down Procedure

In accordance with PSL §66(21)(a)(xi) – Chapter Amendment A.8531- Downed Wires, the Companies prioritize securing of downed wires over non-emergency related activities. Wires down reports are received from customers, police/fire dispatchers, 911 center reps, liaison officers, or field personnel. Wires down reports where there is a hazard such as a fire or where people are trapped by a downed wire are immediately assigned to a line crew by the **Operations Section Chief**. Remaining wire down reports can then be assigned to **Wire Guards** or make safe crews according to the **PRIORITY** below (highest to lowest):

- **Priority 1 – (HIGHEST)** Wire down reports where it is indicated that the wire is burning, arcing and down, or immediate hazard (e.g., immediate threat to life), or wires down blocking road ingress and egress (with no alternative route). These are assigned by the **Operations Section Chief** or designee to make safe crews for immediate response. If the number of Priority 1 reports exceeds line resources, the **Operations Section Chief** will coordinate **Wire Guard** assignments with the **Wires Down Branch Director**.
- **Priority 2 –** Relief of fire departments, police departments, or other municipal agencies that are standing-by downed wires**.**
- **Priority 3** – Report of wire down from an Emergency Organization.
    - Reported to be affecting traffic flow on a major public highway
    - Reported to be blocking/near a pedestrian walkway or driveway
    - Reported to be primary conductor
    - Reported to be secondary conductor
- **Priority 4** – Report of wire down from other sources:
    - Primary conductor is indicated
    - Secondary conductor is indicated
- **Priority 5 – (LOWEST)** Report of wire down where type of wire is not indicated, or where it appears the wire is not likely an electric conductor.

Upon arrival at a downed wire location, the responder assesses the situation and will determine the level of severity based on the following guidelines:

- **Severity 1 – (HIGHEST)** – Wire down conductor that poses a high risk to public safety due to its location in a road or pedestrian-accessible area. These situations will require the responder to remain on-site and guard the wire until they can be relieved. The **Wire Guard** may leave after the wire has been made safe by a qualified employee(s) or contractor(s).
- **Severity 2** – Wire down is a primary conductor but is not on a main road or other easily accessible location. These situations will also require the wire guard to remain on-site until the conductor can be verified de-energized by a qualified employee or contractor. Once the wire is known to be de-energized, the **Wire Guard** will barricade the area and then can move on to their next location.
- **Severity 3** – Wire down is a secondary conductor. **Wire Guard** will attempt to notify nearby customers and will barricade/tape off the area. If wire is either open wire secondary or triplex service cable that has an exposed end (wire is broken), **Wire Guard** will remain on-site until a qualified employee or contractor has verified the wire is not energized or otherwise made safe.
- **Severity 4 – (LOWEST)** Wire down is not an electric conductor and is not in contact with an energized conductor, but is instead phone, cable, or other communications property. If the situation is safe, the **Wire Guard** will inform the **Wires Down Branch Director** of this and move on to the next order.

7.1.6 Damage Assessment

Damage assessments are an essential component of an effective response and restoration. During the damage assessment period, a review of damage is conducted, and a global restoration time is developed. The purpose of damage assessment is to provide a rapid and reliable method of estimating the nature and extent of damage to the electric delivery system. The assessment will be used to determine if additional resources will be necessary to restore service to customers in a reasonable amount of time-based on the event impact.

Damage assessments will be conducted as soon as it is safe and practical. The field assessment will not delay planning activities; the Incident Command Planning Section will consider multiple input points when drawing conclusions of potential damage. Depending on conditions, a sampling of the affected area may be utilized to estimate the extent of the damage. This is further described in Section 7.2.1: *Estimated Time of Restoration*. The **Damage Assessor** emergency response role is described in Section 5.1: ***Damage Assessors***.

Each **Damage Assessment Branch Director** will mobilize the resources necessary to conduct a preliminary damage assessment for the three-phase and/or impacted areas rapidly while maintaining safety and being practical during the first daylight opportunity.

The decisions of what damage assessment tools to use, the scope of the assessment, number of resources necessary in total and per team will be made by the **Damage Assessment Branch Director** (or **Planning Section Chief** as the supervisor). Various factors will be taken into account, including but not limited to the geography of the area to be patrolled, information learned from all sources about known damages, time of year, time of day, current weather conditions, etc.

The **Damage Assessors** are trained to use their assessment devices (typically iPads) to enter information, even when outside of cell coverage, as the **Damage Assessor** will submit the data once within cellular service coverage.

The main objectives of damage assessment include:

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

Two types of damage assessment can typically be performed during an event:

1. Initially, a preliminary assessment is performed. The **Damage Assessment Branch Director** is responsible for ensuring a preliminary assessment is performed. Preliminary assessments will be completed within 24 hours of the start of restoration. The purpose of this assessment is to capture the most critical information as rapidly as possible. This may include but is not limited to:
    - Broken pole locations
    - Leaking transformers that may be an environmental concern and need to be addressed immediately
    - Downed wires
    - Blocked roads
    - Extreme tree damage on company equipment
    - Significant damage/heavily damaged area that will take considerable time or resources to repair

    This preliminary assessment information is critical to the initial restoration planning efforts in establishing a global ETR, segmenting, and providing any regional ETRs where possible, and securing additional resources, if required. The purpose of the preliminary assessment is to gather data of heavily damaged assets that can be recorded from a vehicle at speeds safe for road conditions (e.g., 20 mph) and does not include off-road right-of-way foot patrol.
2. The next phase of damage assessment is a more detailed assessment. Detailed assessments are requested of the **Damage Assessment Branch Director** by the **Incident Commander** or designee when the extent and severity warrant additional inspection. This additional inspection will include assessing remote areas and spur lines where damage is likely to have occurred and will be completed by the Damage Assessor within 48 hours after the start of restoration. The information gathered in the detailed and preliminary damage assessment is considered in the restoration plan. Detailed assessment may be limited for events with full restoration expected to be less than 48 hours, detailed assessment includes but is not limited to:
    - Off-road locations that require walking patrol
    - Floating conductors
    - Broken/leaning poles
    - Damage/broken cross arms
    - Service connections down/pulled away
    - Road obstructions
    - Electrical damage caused by vegetation

7.1.6.1 Assessment Resource Allocation, Readiness and Utilization

Pre-Event:

In the preparation phase at the Area Command level, the **Area Commander**, **Assistant Area Commander – Planning** or **Damage Assessment Coordinator** (if activated), will review planning data (this may include forecasts and prediction models, etc.) and shift resources assigned to the **Damage Assessor** role from one division location to another to pre-stage. If sufficient resources are not available, or a possibility of exhausting resources is known, the **Damage Assessment Coordinator** will:

- Advise the **Assistant Area Commander – Planning** that affiliate, contract, or mutual assistance assessment resources may be needed. In this case, the **Assistant Area Commander – Planning** will advise the **Damage Assessment Coordinator** to utilize established contract resources, affiliate contractors, or the mutual assistance process via the **MAG Liaison**.
- Contact contract companies who have damage assessment resources to either mobilize contract resources or place them on standby (if available)
- Continually advise **Assistant Area Commander – Planning** of resource acquisition
- Before an emergency event, the **Damage Assessment Branch Director** will establish landlines for damage assessment reporting and ensures devices (e.g., iPads) are charged, and connectivity is working.

During an Emergency Event:

At the Incident Command level**,** the **Planning Section Chief** (or **Incident Commander**) will activate the damage assessment program at the local, usually division, level. The **Planning Section Chief** will instruct the **Damage Assessment Branch Director** of the heavily damaged portions of the systems and the time period in which the analysis is required to be completed. When developing a strategy 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 is based on many factors, including but not limited to 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 is a rough assessment to determine the extent of the damage to the Companies' facilities; and to determine what resources will be required to work on the response and restoration activities and assist with establishing a global ETR.

If additional resources are needed, the **Damage Assessment Branch Director** will make a request to the **Incident Commander**. The **Incident Commander** will coordinate the request through the **Area Commander,** who will approve and provide all resource requests to the **Assistant Area Commander – Planning**. The **Assistant Area Commander – Planning** may designate assessment resource acquisition and movements to the **Damage Assessment Coordinator,** as they have the ability to move resources between areas or to engage additional resources to support the damage assessment function.

Depending on the conditions and severity of the event impact, the **Area Commander** and **Incident Commander(s)**, with support from the **Planning Section Chief,** and **Damage Assessment Branch Director,** may use an extrapolation of the limited or partial damage assessment data available early on. It is based on prior similar-sized events in the past five years to determine needs and ETRs. Information gathered from all sources, including **Field Circuit Coordinators**, **Line Crews**, **Damage Assessors**, or other personnel, and information gathered from emergency management, law enforcement, and customer calls shall be collected and utilized by the **Planning Section Chief** in determining damage resources needs and assignments to the response effort. Reports from other

sources, such as OMS data, can supplement and assist with the preliminary assessment, but they will not be relied on solely.

The **Damage Assessment Branch Director** will use OMS data (customer calls, electric trouble, and power interruptions) to determine the affected circuits. **Damage Assessors** will be assigned by the **Damage Assessment Branch Director** to affected circuits and instructed on the type of assessment (i.e., preliminary or detailed) or assist with circuit sweeps near the completion of the event.

Patrols are performed at all hours but are most effective if performed during daylight hours. Preliminary and detailed assessments will be performed by trained personnel and may be done by vehicle, on foot, or other forms of transportation as conditions dictate.

Prior to **Damage Assessors** being dispatched, the **Damage Assessment Branch Director** or a designee will provide a job briefing on safety, reporting and communication procedures, resources available, and the expectations of damage assessors during this event. The **Damage Assessment Branch Director** will establish phone numbers to be disseminated to active **Damage Assessors**

The **Damage Assessors** will be provided with assessment materials, which may include:

1. Damage assessment device, if available (usually internal resources only):
    - Camera to photograph a complicated or unusual hazardous condition.
    - Communication via text and email from the damage assessment device.
    - Documents with instructions on how to operate the damage assessment device (e.g., passwords to access data and damage assessment training document).
2. A Damage Assessment guideline that outlines preliminary and detailed damage assessment criteria; this form includes areas for written instructions from the **Damage Assessment Branch Director** that are specific to the event, such as phone numbers for Planning rooms, mobile phone, and email contact information.
3. Blank tally sheets to total damage recorded on damage assessment forms in case the device is broken or damaged during the assessment.
4. Blank damage assessment forms for recording damage.
5. Paper copies of circuit map(s) of the area to be assessed.
6. Company provided cell phone or company radio (for internal resources only).

In the event of the loss of device technology, the Companies will rely on the paper circuit maps provided to the **Damage Assessors**. The **Damage Assessment Branch Director** may instruct the **Damage Assessors** to enter progress on the device and/or mark the paper map, and then return the marked-up map to the **Damage Assessment Branch Director** for compilation or provide it to a **Field Support Runner** or designee to return to the office. The **Damage Assessment Branch Director** or designee exports the damage data to an excel file and print circuit maps with plotted damage data or marked-up circuit maps locating damage are made part of work packets assigned to crews. Work assignments can be made by **Operations Section Chief** or designee. In some instances, the Companies may pair a **Damage Assessor** with personnel to drive the vehicle while the **Damage Assessor** performs their assessment.

If the **Damage Assessor** discovers a hazardous condition (e.g., downed conductor) that is not cut and cleared or otherwise made safe, they will attempt to make the area safe and are required to contact the **Damage Assessment Branch Director** and the **Wires Down Branch Director** to have a **Wire Guard** stand by hazardous conditions as stated in Section 7.1.5.1: *Wires Down Procedure.*

Dispatch of personnel to stand by will be performed in a timely manner to relieve **Damage Assessors** that are guarding downed wires, with an aim to relieve the Damage Assessor within eight (8) hours of notifying the **Damage Assessment Branch Director**, to minimize the adverse impacts on the damage assessment function. In situations where relief does not occur within 8 hours a replacement **Damage Assessor** will be assigned to complete the original damage assessment. Conditions reported by **Damage Assessors** will be submitted to the **Damage Assessment Branch Director** or designee**. Damage Assessors** are not intended to stand by any wires down found during their patrols. For further details on making a hazardous area safe, see Section 7.1.5: *Make Safe*.

Once the preliminary damage assessment has been completed, the **Damage Assessment Branch Director** will instruct the **Damage Assessors** to perform detailed damage assessments. However, If the damage is not extensive or sufficient information is provided during the preliminary assessment, the **Damage Assessment Branch Director** may determine that further detailed assessment is not necessary. The exact location and timing will be provided by the **Damage Assessment Branch Director** to the **Damage Assessor**. After this assessment is completed, the **Damage Assessor** will report back to the **Damage Assessment Branch Director** for further instructions.

7.1.6.2 Wires Down Procedure for Damage Assessors

The intent of this Wires Down Procedure is to identify downed/low-hanging conductor that is or may be energized and provide prompt relief of the **Damage Assessor** to allow the damage patrol to continue. **Damage Assessors** are not intended to stand by down wires found during patrols. **Damage Assessors** will assume all downed/low hanging conductors are energized unless properly grounded with a visible open or made safe. Therefore, at all times, **Damage Assessors** will continue to maintain safe clearance distances, and at no time will any conductors be moved.

1. The **Damage Assessor** shall determine the priority and severity level of the down wire situation. These classifications can be found in Section 7.1.5.1: *Wires Down Procedure*.
2. All downed wire locations and severity level shall be reported to the **Damage Assessment Branch Director** and **Wire Down Branch Director**. The **Damage Assessor** will receive further instruction on the availability of a replacement **Wire Guard** or make safe crew.
3. After reporting the downed wire, the **Damage Assessor** will maintain a safe distance and barricade the location with caution tape and/or cones. The **Damage Assessor** is required to stand by if the downed wire is assumed to be energized in an area where contact is likely, regardless of the source (e.g., customer-owned generator). Once the **Wire Guard** arrives, or the location has been made safe, the **Damage Assessor** may continue with their damage assessment duties. The **Damage Assessor** will be relieved within 8 hours where possible, particularly with unexpected emergency events.

Upon completion of damage assessment survey work and released from damage assessment duties, the **Damage Assessor** may be utilized by Incident Command for wires down or other event assignments that they are qualified to perform, including circuit sweeps. The **Damage Assessment Branch Director** will communicate to the **Incident Commander** or designee as they determine resources may become available for reassignment.

7.1.7 Coordination with Bordering Utilities

A borderline customer can be defined as a customer whose energy delivery is dependent upon a neighboring utility or municipality other than the billing company. During emergency response, it is essential for the Companies to maintain close communication with neighboring utility companies to ensure that all ‘borderline’ customers are being addressed. It will first be necessary to determine which facilities are damaged, the Companies’, the neighboring company’s, or both. This will require field verification in most cases.

Borderline customers who are fed from outside utility sources are coordinated using a procedure provided by the **Energy Control Center Manager of Distribution and Dispatch**. The procedure outlines the process the Energy Control Center personnel follow when they determine borderline customers are affected by a power interruption; it includes the methods to communicate with the neighboring utility to ensure the provision of restoration information (such as ETRs) to the customer and the restoration processes.

If the **Damage Assessor** or **Line Crew** determines that the damage is not on the Companies' portion of the line, and the Companies have decentralized operations to Incident Command in the affected area, then the **Operations Section Chief** or designee will contact the neighboring utility or may contact the Energy Control Center to call the supplying company dispatcher to report the damage location (if known) and to obtain an ETR.

If decentralized, the **Operations Section Chief**, or if centralized, the Energy Control Center will continue to monitor the borderline outage cases and obtain regular updates from the supplying company dispatcher wherever possible. Borderline customers are distinguished in the Companies' OMS in regard to where their energy is being fed from (the Companies or neighboring utility). ETR times will be entered into OMS, once known so that customers will be able to obtain this information via any of the Companies' standard communication channels, see Section 8.1: *Customer Contact Center.*

If the damage is found to be on the Companies' facilities, then the outage case will be prioritized and repaired in accordance with the Incident Action Plan. The billing utility will be provided an ETR once known when the billing utility makes contact with the Companies either to the Operations Section or the Energy Control Center, and/or with a **Liaison County/Local** if co-located at an Emergency Operations Center. Open communication is encouraged between operating personnel between both companies when borderline customers are affected.

7.2 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' Incident Command System 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 data, and identifies resource needs. Supply 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 provide resources necessary to meet the Incident Objectives stated in the Incident Action Plan. 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 Section 7.2.4: *Restoration Priorities*. Cases indicating that dangerous conditions exist, such as live primary wires down, fires, or where the danger to life is involved, shall be given immediate attention (i.e., assigned the highest priority and addressed accordingly). In addition, the priorities identify critical facility 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 **Incident Commander**, **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 event – all of which is declared by the **Incident Commander**, or **Area Commander** if activated. After the event has ended, restoration reports are submitted to the **Incident Commander**. Any temporary repairs are restored to proper function. All repaired facilities are surveyed to ensure they are working appropriately.

Work plans are developed by the **Planning Section Chief** in consultation with the **Operations Section Chief** and under the supervision of the **Incident Commander**. The work plan outlines crew assignments by circuits. This work plan includes which crews are assigned to which circuit, the lead contact (e.g., **Field Circuit Coordinator**) for each crew, which counties are affected by these circuits, and a contact name and number for clearing the outage tickets. The work plan is located on the *StormCenter* SharePoint under the Planning Section. This Division work plan will be shared at the beginning of each operation period with all of the Incident Command System roles and include the **Public Liaison Officers** and **Liaisons County/Local**.

7.2.1 Estimated Time of Restoration Establishment and Reporting

The Companies comply with the Estimated Time of Restoration Protocols[2] and subsequent updates. Figures 8 and 9 detail the requirements of the ETR protocol. Section 7.2.1.1: *Estimated Time of Restoration Protocols* defined by DPS details the requirements of the ETR protocol the Companies follow.

7.2.1.1 Estimated Time of Restoration Protocols

The following ETR Protocols are activated when more than 5,000 customers are out of service in a division, or more than 20,000 customers are out of service companywide for more than 30 minutes. The ETR Protocols include minimum requirements for when and at what level of detail an ETR will be communicated to the Department of Public Service (Department or DPS Staff). The tables below clarify the necessary actions to be taken by the involved utilities before and during the outage period for the specific outage event.[3] Utility procedures and practices that require actions prior to those identified will continue to be used.

The protocols are considered minimum requirements necessary to ensure the public and the Department are adequately informed. During restoration, utilities are to continuously refine ETRs and update DPS Staff and the public, customer representatives, IVR systems, and websites. The utilities will also provide restoration information such as outage counts and ETRs to the press/media outlets and public officials in the affected areas. Additionally, utilities will issue at least one press release daily for all outage events with an expected restoration period longer than 48 hours.

Regional and local ETRs will be used and applicable to at least 95% of the affected customers in the reported level. Regional ETRs are to be provided on a county basis, and local ETRs are to be provided on a town or municipal basis. Global ETRs may be used initially for outage events expected

to last greater than 48 hours and applicable to at least 90% of the affected customers. Once regional ETRs have been issued, references to the global ETR will be eliminated.

When adverse weather conditions exist, the start of the restoration period is the point in time when:

- Field personnel can be dispatched without unacceptable safety risks from continued severe weather conditions and/or
- 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 specific, local areas where the effect of a storm limits access to facilities, for example, severe flooding.

Initial notification to the Department will follow the *Event Notification Requirements* issued in Appendix B of Case 04-M-0159 on January 13, 2015. Any additional information that is available will be included in the initial notification, even if the notification is required prior to the start of restoration. For widespread outage events, company-wide outage statistics will also be provided as part of the initial notification.

OUTAGE EVENT EXPECTED TO LAST 48 HOURS OR LESS

Within the first 6 hours of the restoration period
• Notify DPS Staff that the outage 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 outage events expected to last less than 24 hours, notification may be via the Department's information reporting system. • Provide available information to the public. Update customer representative, IVR systems, and websites. • In certain situations, such as a nighttime outage 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 outage event, the determination of whether the restoration period will be less than 48 hours will be communicated to DPS Staff as soon as possible, but no later than noon the following day. Any delay in establishing the initial expectations will not affect the time requirements below.
Within the first 12 hours of the restoration period
• Provide DPS Staff and the public with any available regional/county ETRs and any available local/town or municipal ETRs. Update customer representatives, IVR systems, and websites. • Issue a press release that includes known ETRs for the next upcoming news cycle • Communicate with affected municipal and elected officials. This communication may or may not be by way of a municipal conference call.
Within the first 18 hours of the restoration period
• Provide DPS Staff and the public remaining regional/county ETRs. Update customer representatives, IVR systems, and websites. • Provide DPS Staff and the public with any additional local/town or municipal ETRs. Update customer representatives, IVR systems, and websites.
Within the first 24 hours of the restoration period
• Consider issuing a press release for the next upcoming news cycle based on conditions.
Reporting requirements during the outage event
• Provide restoration information updates four times daily to DPS Staff (7 am, 11 am, 3 pm, and 7 pm) if requested by DPS Staff. Updates will continue until otherwise directed by DPS Staff. • Notify DPS Staff when all outage events related interruptions have been restored.

Figure 9 Outage Event Less than 48 hours

OUTAGE EVENT EXPECTED TO LAST GREATER THAN 48 HOURS

Pre-event whenever sufficient notice of an impending weather event is available
• Make pre-event outbound calls to Critical Facilities customers, life support equipment customers, and Special Needs Customers. • Complete pre-storm communications with outreach to employees, the news media, social media sites, blast emails, and text messages to customers, and advisories to municipal and elected officials. • Consider having pre-event municipal conference calls based on the situation. An alternative municipal contact method may be used if it is more appropriate. • Issue public statement and/or press releases
Within the first 6 hours of the restoration period
• Notify DPS Staff that it will be a multi-day outage event lasting more than 48 hours. The notification to DPS Staff will state what the Company has defined as the start of the restoration period. • Provide a public statement and/or press releases indicating the likelihood of extended outages and make this information available via customer representatives, IVR systems, and websites. • In certain situations, such as nighttime outage 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 outage event, the determination of whether the restoration period will be greater than 48 hours will be communicated to DPS Staff as soon as possible, but no later than noon the following day. Any delay in establishing the initial expectations will not affect the time requirements below.
Within the first 12 hours of the restoration period
• Issue press releases based on the predetermined time periods defined in the emergency plan. • Communicate information such as system damage, outages, restoration status etc. with affected municipal and elected officials as appropriate. • Schedule the first post-storm municipal conference call(s), unless an alternative municipal contact method is more appropriate. The first scheduled municipal conference call does not necessarily have to be held within the first 12 hours but will be held within the first 24 hours. • Notify DPS Staff and the public of what areas sustained the most damage to the electric system and ETRs where known, on a county or regional basis.
Within the first 24 hours of the restoration period
• Complete the first scheduled municipal conference call. • Provide DPS Staff and the public with a global ETR, any available regional/county ETRs, and any available local/town or municipal ETRs. Update customer representatives, IVR systems, and websites. • Identify for DPS Staff and the public any heavily damaged areas where large numbers of customers may remain without service for more than a few days. If necessary, note that the situation is still unfolding, and more details will be provided as soon as they become available.
Within the first 48 hours of the restoration period
• Provide DPS Staff and the public remaining regional/county ETRs. Update customer representatives, IVR systems, and websites, eliminate all references to the global ETR. • Provide DPS Staff and the public with any additional local/town or municipal ERSs. Update customers representatives, IVR systems, and websites, eliminate all references to the global ETR.
Within the first 60 hours of the restoration period
• Provide DPS Staff and the public remaining local/town or municipality ETRs. Update customer representatives, IVR systems.
Reporting requirements during the outage event
• Provide restoration information updates four times daily to DPS Staff (7am, 11am, 3pm and 7pm), unless directed otherwise. Updates will continue until otherwise directed by DPS Staff. • Notify DPS Staff when all outage event related interruptions have been restored.

Figure 10 Outage Event Greater than 48 hours

7.2.2 Estimated Time of Restoration Process During Events

The Energy Control Center will provide ETRs for all divisions that are not decentralized, according to the blue-sky day procedure. Automated ETRs are set and utilized for each division based upon average restoration response times as determined by the **Incident Commander**.

Automatic ETRs are deactivated upon decentralizing (opening Division offices) in preparation for or during a Class I or greater event. This guideline can be altered in cases of proactive decentralizations when storm trouble has not yet elevated significantly.

As soon as an Incident Command location (usually a division office) is manned and/or >5000 customers are out of power, the Energy Control Center staff will contact the **Incident Commander** or designee to determine decentralization, including whether automated ETRs are used or turned off. If automated ETRs are off, ETRs are specified as "assessing" and then followed by global, regional, and local ETRs as more detailed information becomes available managed by the **OMS/ETR Branch Director** or designee under the direction of the **Incident Commander**.

The Incident Command team will develop a restoration plan, which will determine crew assignments. The **Planning Section Chief** ensures that accurate field assessment and restoration status is communicated with the **Operations Section Chief** and **Incident Commander** and included in the process for establishing global, regional, and local ETRs. The **Incident Commander** will provide the draft regional ETR(s) to the **Area Commander** for review and approval, or the **Area Commander** may request that the ETR be recalculated:

- The **Incident Commander**, working in conjunction with the **Area Commander**, will determine the official time that the storm restoration began.
- The **Incident Commander** or designee will determine the use of automated ETRs, or if ETRs will be entered manually by the **OMS/ETR Branch Director** or designee.
- If automated, ETRs are not used; the **Incident Commander** may choose to set a regional ETR for 95% of the customers affected.
- If the **Incident Commander** determines that 95% restoration within 24 hours is not likely, the procedure for a Class II or III storm will then be followed. If a Class II or III event is determined, the **Incident Commander** will follow the ETR Protocols outlined in Section 7.2.1.1: *Estimated Time of Restoration Protocols*.
- The **Circuit Information Coordinator** assigns incidents to each crew in accordance with the restoration plan.
    - **Field Circuit Coordinators** or **Line Crews** may use their mobile devices to report arrival times and ETRs or contact the **Circuit Information Coordinator** when arriving on the job site and report their expected ETR.
    - ETRs will be revised as needed, but not unless the new estimates exceed one hour from any existing ETR.
    - **Field Circuit Coordinators** or **Line Crews** will also be instructed to inform the **Circuit Information Coordinator** if the actual field conditions do not match what was predicted or assessed.

If at any time, the global, regional, or local ETR is in danger of being exceeded, the **Incident Commander** will notify the **Area Commander** and provide a revised estimate. In Class II or III event, initially, ETRs are specified as "assessing" and then followed by global, regional, and local ETRs as more detailed information becomes available. The **Area and Incident Commanders**, using known

data, provided by company resources, customers and public reports, municipal resources will analyze the data in a tracking tool, and, reviewing the current reported broken poles, wires down, and incident counts, along with past storm data and experience, will begin the global ETR setting process.

The **Assistant Area Commander – Planning** will ensure the **Area Commander** has an accurate knowledge of available resources for each region, so this is included in the calculation of the global ETRs and approval of regional ETRs. The **Area Commander** will issue a global ETR and approve the regional ETRs submitted by the **Incident Commander(s)** (or provide instructions to the **Incident Commander(s)** to recalculate them). The **Area Commander** may include members of the executive team or others in consultation during ETR development and approval. Calculation and management of local ETRs are the responsibility of the **Incident Commander** or their designee. For outages expected to last longer than 48 hours, the Companies will provide regional and local ETRs applicable to 95 percent or more of the affected customers.

To determine the ETR for an event with multiple incidents, the number of incidents, the type of incident (e.g., pole, primary, and service), the available crew resources must be known. As this information becomes known and refined over time, the accuracy of ETRs increase. The following chart lists out the time from the start of restoration the Global, Regional and Local ETR's must be calculated and communicated. This chart is based on the maximum amount of time needed to complete the restoration; the Companies will strive to provide ETR data to customers, media, officials and the general public as soon as it is available: All reference to global ETR's should cease 48 hours after the start of restoration; regional and local ETR's only.

ETR Type	< 48-hour Restoration	48 hr-5-day Restoration	>5-day Restoration
Global	N/A	<24 hours	<24 hours
Regional	<18 hours	<24 hours	<36 hours
Local	<18 hours	<36 hours	<48 hours

The following information is required to calculate the Global and Regional ETR (this list should be considered a minimum and is not all inclusive):

- Number of incidents from the Outage Management System
- Damage information that has been obtained through damage assessment
- Repair time estimate per incident (hours)
- Current date and time of event
- Current qualified FTEs on site
- Additional FTEs available, either en route or in other locations (i.e. staged or readily available)

In the event of a multi-day Class III Event where all the damage assessment data needed cannot be safely obtained in time per the chart above, the Companies will utilize a formulaic approach to extrapolate from known damage assessment data early on in an event. These estimates will then be utilized for required information needed to calculate the initial Global ETR prior to the completion of the initial Damage Assessment.

In most instances, customers appreciate receiving an ETR that the Companies have confidence can be achieved; therefore, the Companies will err on setting typically conservative ETRs. During the response period for major events, ETRs may have to be adjusted beyond the original issued ETRs due to:

- Extent of the damage to the Companies' transmission or distribution systems.
- Power interruptions 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 or resurgence of inclement weather throughout the response period, resulting in new or extended customer power interruptions.
- Additional resources now available beyond those incorporated into the restoration plan or loss of resources (e.g., mutual assistance resources being recalled).
- Improved weather conditions which result in earlier restoration times.

During the initial hours of an event, both the extent of damage and available resources are typically unknown. Early in major events, the Customer Contact Center places an up-front message on the IVR system and utilizes social media and the websites, among other tools, to inform customers impacted by the power interruptions that the Companies are assessing damage to their systems. Included on the website outage map is a banner message that will provide customers with information on ETR calculation protocols and other pertinent information. The **Assistant Area Commander – Public Information Officer** provides information and updates to the **Website Coordinator** who will update the website(s) accordingly. The message is updated as ETRs are established, or new information becomes available. Customers enrolled in the Companies' outage alert program will receive text alerts with outage, ETR and restoration updates, including updated ETRs as applicable, according to their user preferences. More details on ETR communications and outage alerts can be found in Section 9: *Customers, Public Officials and Media*.

As more detailed damage information becomes available, the **Area** and **Incident Commanders** will evaluate the information along with the restoration plan. This evaluation ensures that accurate field assessment information and restoration status is included in the process for establishing global, regional, and local ETRs.

Once local ETRs are provided, the **OMS/ETR Branch Director** or designee will review ETRs twice a day, at approximately 7 am and 3 pm, and update ETRs based on any changes in the restoration forecasts at those time periods. The 7 am and 3 pm review times were chosen to provide customers and municipal partners time to make any necessary arrangements if an ETR requires adjustment.

7.2.2.1 Phase I: Global (Company or Division Level) ETR Establishment

- 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.
- Damage assessment information is sent to the Planning Section, and system damage estimates are generated. As additional assessment information is received, these estimates are repeatedly updated.
- For a Class III Storm Event; **Area Commander** and **Incident Commander(s),** along with **the Planning Section Chief,** and the **Damage Assessment Branch Director** will use an extrapolation of the limited or partial damage assessment data available early on, based on prior Class III events in the past five years. For instance, if a prior event ultimately reached a total of 1,000 broken poles and 1,000 incidents, but at T+24 hours or T+36 hours only 100 or 200 poles had been confirmed and 100 incidents down, then the same multiplier of ten times or five times will be utilized to extrapolate on the estimate of total damages based on data at T+24 hours or T+36 hours.
- Broad restoration strategies are developed within the Planning Section as damage information is verified. Work plans for high priority assets are developed early as the overall restoration plan is developed. Typically, restoration plans for restoring affected

transmission facilities, impacting significant numbers of customers, will be developed early in the process.

- Specific job estimates are made as they become known and are incorporated into the restoration overall work plan. Before global or regional ETRs are known, the ETR fields in OMS are left blank unless information for a specific job is available from an on-site repair crew.
- As sufficient information becomes available and the weather event subsides, a global ETR is determined for release to the public through a statement by the Companies information posted on the Companies' website(s), social media pages, the IVR upfront message, and in required DPS EORS outage reports. See Section 8.7.3: *Media Contacts* for additional details, including timing.
- The global ETR will be included in the next news release and within the first paragraph, which is also promoted on social media, and on the website. This estimate is made through a collaborative process between the **Incident Commander(s), Planning Section Chief**, **Operations Section Chief**, **and Area Commander**. If a regional ETR is available, it will also be included as appropriate.

7.2.2.2 Phase II: Regional (County) ETR Establishment

- Regional ETRs will be communicated by the affected county or counties. The regional ETR calculation takes into account the same types of factors as described under the global ETR section, however, it is specifically targeted at the identified county lines to enable planning by municipal partners and customers who do not need to understand the Companies division structure.
- The initial regional ETRs may be conservative given the many uncertainties at the early stage of an event and are an estimate of restoration of all customers included in the selected area.
- ETRs specific to each region are loaded into the OMS and managed by the **OMS/ETR Branch Director** or designee.
- **The Public Information Officer** communicates the regional ETR through a statement by the Companies that is provided to Command staff internally and posted on the Companies' website(s), social media pages, and the IVR upfront message. See Section 8.7.3: *Media Contacts* for additional details, including timing. This regional message may be issued separately from the global ETR announcement, particularly if a region has a different ETR (e.g., more accelerated) than the global ETR.

7.2.2.3 Phase III: Local (Municipalities) ETR Management

- **Public Liaison Officers** and **Liaisons County/Local** will use the iCDS system reports section to access ETR data and communicate restoration status by the town to municipal officials.
- To develop the local ETRs, generally, a detailed division work plan is provided by the **Planning Section Chief**, or designee usually working during the overnight operational period for the next day's operational period. The local ETR information is fine-tuned by the **Field Circuit Coordinator** and **Circuit Information Coordinator**, as needed, based on information received from the crews in the field.
- Local ETRs are managed and/or updated when information becomes available from crews or when circumstances change, such as when additional resources are made available to Incident Command staff. The Incident Command Planning Section manages the local ETR data in conjunction with the Operations Section.

7.2.3 Job Specific ETR Management:

Reporting, for regulatory purposes and public information releases, do not typically extend to the job specific local ETR. As described in Section 9: *Customers, Public Officials, and Media*, customers may access information about their specific incident. They are able to call the Companies' electric emergency number and talk with a **Customer Contact Center Representative** by listening to the prompts and messages in the IVR system, on the Companies' website(s) and, the "Outage Central" web pages, and through text alerts, if the customer is enrolled in the *Outage Alerts Program*.

During a response event, the Energy Control Center (if centralized) or **OMS/ETR Branch Director** or designee (if decentralized) update information in OMS 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 and recloser status). The information is updated in OMS as the information is received from various sources. ETRs are also updated utilizing the same sources of information.

7.2.4 Restoration Priorities

The Companies prioritize restoration efforts according to system design, Critical Facility priorities, and equipment types. **Line Crews** and **Service Crews** are assigned based on the plan below with granularity defined within each of the three subsections.

Restoration and repair of electric service following an event will generally proceed according to the following priority:

1. Ensure public safety by working with emergency response personnel to respond to hazardous conditions.
2. Clearing downed wires in critical areas to facilitate the prompt clearing of public hazards and opening critical transportation corridors.
3. Coordinating with municipalities to open critical roadways by clearing and/or de-energizing electric hazards that prevent restoration.
4. Repair of electric transmission lines and substations that are affecting customer's electric service.
5. Critical Facility Level 1 Customers
6. Critical Facility Level 2 Customers
7. Critical Facility Level 3 Customers
8. Assign outages by order of customer count, largest to smallest.
9. Repair of electric transmission lines and substations that do not affect customers' electric service.
10. Permanent repairs to temporary conditions.
11. Tree conditions not causing service interruptions.

While the priorities above represent a hierarchy, which is considered when establishing Incident Action Plans and assigning outage locations to crews, these priorities have to be balanced with the criticality of having large numbers of customers without service. When restoring large blocks of customers, this may also restore a significant number of Critical Facilities and high-priority customers. A general guideline for restoring the greatest number of customers after the transmission line repair would follow the order below:

1. Primary distribution – three-phase
2. Primary distribution – single-phase or spur lines

3. Secondary distribution services

The **Public Liaison Officer** or designee will coordinate with State and/or County Emergency Management Officials to prioritize the restoration sequence of Critical Facilities during a major storm event. Deviations from the priority plan may occur as dictated by weather conditions, worksite accessibility, the extent of damage to an individual circuit, the proximity of a critical facility to the substation, and the progress of the restoration effort. Other exceptions to the listed priority include special events, the availability of backup generation, and seasonal issues. The purpose of setting restoration priority is to ensure public and worker safety and to restore service to all customers as quickly as possible.

7.2.4.1 System Restoration Priorities

The Incident Command 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. When all other conditions are equal, an outage with Life Support Equipment customers will be prioritized over an outage without any Life Support Equipment (LSE) customers (such as two single customer outage incidents, where one incident affects an LSE customer). During extended interruptions, the Companies will also consider the length of time a customer has been without power in setting priorities.

Level	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 Facilities (see Section 7.2.4.2: *Critical Facility Restoration* below). • Restore primary feeders and feeders in urban areas (cities >50,000) based on the number of impacted customers. • When completing restoration work in a specific area or location, consideration will be given to the complete restoration of customer service including those listed in 5 and 6 below 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.)

Figure 11: System Restoration Priorities

7.2.4.2 Critical Facilities Restoration Priorities

A priority list will 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 event may warrant changes in these priorities, and the **Incident Commander** 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

	Critical Facility Descriptions
1	**Critical Facility Level 1** - These facilities provide services critical to public health and safety: · Hospitals and Emergency Medical Facilities · Emergency Shelters and Cooling Centers · Fire, Police, Paramedics, and Rescue Facilities · Emergency Management Offices · Water pumping stations and wastewater treatment plants · Critical Utility and Communications Facilities · Fuel Transfer and Fuel Loading Facilities (ports) · Mass Transit (tunnels, electric drawbridges, ferry terminals, major rail facilities/rectifier stations) · Airports · Military Bases · Critical Flood Control Structures
2	**Critical Facility Level 2** - These facilities provide significant public services and may include some of the same type of facilities described in Level 1 depending on the event type, but are considered to some extent less critical by government agencies: · Nursing Homes and Dialysis Centers · Facilities to support other critical government functions · Prisons and Correctional Facilities · Communications (radio, TV, etc.)
3	**Critical Facility Level 3** - These facilities may provide some public services and may include some of the same type of facilities described in Level 2 depending on the event type but are considered to some extent less critical by government agencies. · Event Specific Concerns · High-Rise Residential Buildings · Customers providing key products and services (food warehouse) · Managed Accounts, Large Employers, and Other Key Customers · Other Government Buildings, Schools, and Colleges · Residential developments with large elderly population or similarly vulnerable establishments, identified by local municipalities. (Some of these Level 3 Critical Facilities may not be contacted)

Figure 12: Critical Facility Restoration Prioritization

Critical Facility definitions referenced in the above figure are:

- Level 1: Critical to public health and safety.
- Level 2: May include some of the same types of facilities described for Level 1, depending on the event type. These facilities provide significant public services but are considered, to some extent, less critical by government agencies.
- Level 3: These Facilities may provide public services but are considered, to some extent, less critical than Level 2 by government agencies.

Critical Facility accounts are coded in the Companies' Customer Relationship Management and Billing System (CRM-B). Critical facility lists are updated weekly and posted by the Business Support and Solutions Department to the Companies' *StormCenter* site (accessible to Company personnel).

Critical Facility and Life Support Customer outage reports are available through the Companies' outage-reporting system, iCDS. The report will provide a list of Critical Facilities (and/or Life Support Customers) that are currently without power based on the criteria selected.

7.2.4.3 Equipment Restoration Prioritization

Electric system equipment restoration is prioritized as:

Level	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 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 sub-transmission circuits that are locked out • 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

Figure 13: Equipment Restoration Prioritization

When a certified electrical inspector is not readily available and with the approval of and guidance from local municipalities (e.g., code enforcement), the restoration personnel may have customer/agent sign a Service Reconnection Form (found in Appendix A: *Additional Material*) only if the panel box has not been flooded and with approval of the Area Commander or IC that the event qualifies for use of the form. (This method is utilized if an electrical inspection certificate cannot be obtained. During certain events, certified electrical inspectors are not always readily available to perform inspections.)

7.3 Final Phase

The final phase commences when the Companies have restored 95 percent of customers but may still be identifying customers without service, restoring power, and/or addressing individual customer concerns.

Under the direction of the **Incident Commander,** circuit sweeps are performed on transmission and distribution circuits that had been damaged during the event. Any temporary repairs that were made to restore service which require a permanent repair are noted and addressed as soon as possible by the Division.

Circuit sweeps are to be performed by Line Crews, **Damage Assessors, Vegetation Management** or other qualified personnel on the most significantly impacted distribution circuits in order to identify possible damage that could cause additional power interruptions or safety concerns. These sweeps will be completed prior to or during demobilization. During this period, demobilization of external resources may have started, and the public is informed that restoration is complete.

During the emergency event, resource requirements are continuously evaluated by the Incident Management Team. The **Planning Section Chief** is responsible for advising the **Incident Commander** of any excess resources or needs. The **Incident Commander** may approve the release of excess resources.

Resources are deactivated as they complete their particular assigned tasks in restoration. The **Area Commander** or **Incident Commander** will release **Mutual Assistance Crews** when restoration is complete unless crews can be retained as part of the agreement. The sending utility and/or contractor are informed that their support is no longer required. This is done in coordination with the NAMAG and NYP/PUMA agreements.

Demobilization plans are written by the **Incident Commander(s)** with **Area Commander** approval. Once approved, demobilization instructions are communicated through the Incident Command Structure chain of command, including NAMAG and NYP/PUMA (with a courtesy notification to the mutual assistance group as appropriate). The demobilization plan will be executed by the Incident Commander or designee. The resources that have been demobilized will be required to sign out or notify **Logistics Section Chief** or designee once they are ready to travel home.

Due to the nature of emergency events as they expand and contract, demobilization shall be evaluated. As the event begins to diminish, the local **Planning Section Chief** will develop as part of the Incident Action Plan a formal demobilization plan with consideration given to the following:

- Order and timing for release of resources
- Document rest times, ensure personnel receive proper rest prior to release as required

- Consider distance to travel and associated costs
- Determine if mutual aid utilities have requested crews return
- Contractual agreements
- Redeployment availability within Avangrid or within NAMAG
- Home division staffing needs
- Evaluate impacts on other requirements such as
  - Gas performance metrics (e.g. damage prevention), vegetation management other customer service efforts (including actual meter reading and customer connections)
- Coordinate all releases and redeployments with the **Assistant Area Commander – Planning**

The decision made by the **Area Commander** or **Incident Commander** to release crews is based on the status of the restoration effort and consistent with union contracts and mutual assistance agreements. At such time as mutual aid crews are no longer needed, they will be released in accordance with the applicable mutual assistance group guidelines

8. CUSTOMERS, PUBLIC OFFICIALS AND MEDIA

Establishing communications with customers is an important part of the Plan. The Companies will provide ways for Customers to receive outage details, including areas affected and estimated restoration times as those times become available. The Companies also maintain records of and reach out to, Life Support Equipment, Special Needs, and Critical Facility Customers. This section outlines general procedures and methods for establishing and maintaining contact with customers during events. It also describes the Companies' use of websites and social media, communications with elected and municipal officials, and contacts with the media.

For the purposes of the Plan, consistent with 16 NYCRR § 105.4(b) (9), the following definitions are being used:

- Life Support Equipment Customers: Those customers who require electrically operated equipment to sustain basic life functions.
- Special Needs Customers: Those customers who have been identified as having certain attributes; such as the elderly, the vision-impaired, the hearing and speech-impaired, and the mobility impaired. Customers with medical emergencies are also considered in this category.

The Companies define Critical Facilities as:

- Critical Facilities: Those "facilities" from which essential services function for the continuation of public health and safety and disaster recovery are performed or provided (such as hospitals, water, and sewage treatment plants, and fire stations). Critical Facilities plan for continuous electric service to ensure business continuity or continuity of government. *Critical Facility owners are responsible for their own backup generation and appropriate fuel.* Electricity service will be maintained through uninterrupted utility service or a momentary interruption followed by a transfer to backup generation. A critical facility is given a restoration priority based on the Plan, as outlined in Section 7.2.4.2: *Critical Facility Restoration Prioritization*.

Pre-Event Communications:

Program Managers – Government & Community Relations will offer two opportunities for county Emergency Operations Center personnel to meet to discuss topics related to emergency preparation

and response as outlined below. The first will be an in-person or virtual meeting which will be completed by June 30th. These meetings may be conducted with individual or multiple counties and adjoining utilities. The second opportunity will be initiated via email approximately six months following the first meeting. The email will provide any updates or revisions that occurred since the first meeting relating to the topics noted below. The email will also offer an opportunity for an in-person or virtual meeting to review the materials.

Meeting topics may include:

- The Companies' Electric Emergency Plan
- Area Command and Incident Command Structures (for new participants)
- Road clearing coordination
- Restoration protocols
- Current list of Critical Facilities and infrastructure (e.g., hospitals, warming/cooling centers, high priority roads, etc.) in the Companies' service areas
- Circuits with known residential developments of large elderly populations or other similarly vulnerable establishments
- Potential dry ice and bottled water distribution locations
- Life Support Equipment contact procedures and coordination during events
- Contact information review and updates

The Companies provide electricity service to; 42 counties (NYSEG), nine counties (RG&E), 572 municipalities (NYSEG), and 95 municipalities (RG&E). The **Assistant Area Commander – Public Liaison Officer** or **Public Liaison Officers** assigns **Liaisons County/Local** at the County Emergency Operations Center level for efficient and effective coordination as warranted.

8.1 Customer Contact Center

In advance of any anticipated large outage event, the Companies' **Customer Contact Center Manager** or designee and staff will begin planning for the potential event to ensure resources are available to respond effectively to system emergencies. Potential staffing levels are determined by taking into account various factors, including type and potential severity of the weather event (e.g., snow, ice storm, heavy rain/flooding, high winds, or hurricane), total area to be impacted (e.g., single division, multiple divisions), and timing of the event (e.g., normal workday, weekend/holiday, immediately following another major weather event, etc.). The Customer Contact Center Management will coordinate and communicate activities with the **Assistant Area Command – Customer Needs**. When Area Command is activated, the Customer Contact Center receives support and direction through the **Assistant Area Commander – Customer Needs**.

For events expected to occur after hours, the **Customer Contact Center Manager** or designee is responsible to utilize proactive staffing to ensure coverage of the call volume from the initial start of the event. Proactive internal staffing is secured by advising contact center employees of the need for after-hours support and securing volunteers. Routinely, the Companies utilize an outsourced call center to provide after-hours coverage for outage calls. Life threatening emergencies, wires down, LSE callers and customers wishing to escalate a concern are transferred back to NYSEG or RG&E **Energy Control Center Representatives** designated to handle those calls. For all other calls, web tickets are entered by the vendor and ETR information (as available) is provided.

The outsourced staff may also be supplemented with Energy Control Center and/or Customer Contact Center resources for smaller events, per arrangements between the **Customer Contact Center Manager** and **Energy Control Center Manager**. Depending on the nature of the expected event, the outsourced company may be utilized initially, or the **Customer Contact Center Manager** or designee may proactively open the Customer Contact Center(s) for an expected larger event.

The number of resources required to manage call volume during a Class I, II and III event weather events is determined using information including, but not limited to:

- Size and intensity of the expected weather event,
- Number of initial outage reports (individual) and number of outage incidents,
- Incoming call volume,
- Damage estimates obtained from damage assessments and scope of damage (distribution and/or transmission circuits impacted) and,
- Additional outage factors such as numbers of wires down, tree damage and road accessibility, area of power interruptions (rural/urban).

It is the responsibility of the **Customer Contact Center Manager** or designee to develop operational hours and schedules structured to support the maximum response effectiveness while maintaining customer service for other parts of the service area that may not be affected (as appropriate). During emergency events, the Customer Contact Center(s) are staffed around the clock; however, staffing overnight is generally lighter due to the decreased call volume.

The **Customer Contact Center Manager** has developed a staffing guide in Figure 14: *Customer Contact Center Minimum Staffing Guide* to illustrate resource levels for electric emergency calls. At all times, the **Customer Contact Center Manager** or designee will continually monitor incoming call levels directed to live representative and call center staffing to meet the minimum requirement of 80% of calls answered by live representative within 90 seconds each day throughout the event until full restoration is achieved.

The **Customer Contact Center Manager** or designee will ensure accurate measurement of staffing levels by recording the number of agents taking calls in 15-minute intervals. Calls into the Customer Contact Center(s) are continually monitored by the Customer Contact Centers' Workforce Management Group or designees for abandonment rates and busy signals during periods of blue-sky operations and storms. When anomalies are identified, the Customer Contact Centers' Workforce Management Group will determine whether some or all of the following actions will be taken adjusting schedules or staffing levels, IVR routing (including the high-volume IVR solution), updating IVR messaging, or contacting telecommunications providers in case the issue is outside of the Companies' control.

Customer Contact Center Representative Minimum Staffing Guide			
Shift	**Class I**	**Class II**	**Class III**
12 am to 6 am	3	4	5
6 am to 6 pm	8	15	30
6 pm to 12 am	6	12	25
Event Classifications are defined in Section 3.			
High volume call taking technology will be turned on immediately when certain conditions exist (such as a significant weather event impacting multiple divisions, notification from Area Command, and natural disaster such as an earthquake) or based on results of monitoring by **Customer Contact Center Manager** or designee.			
When circumstances require the use of high-volume call taking technology, the staffing numbers may be modified to ensure 80% of all live calls are answered within 90 seconds.			
Depending on call volume levels for each Company, the **Customer Contact Center Manager** or designee may decide to staff additional resources at the unaffected Company to more fully support the answering of calls using the virtual call center technology. The Customer Contact Centers have the option of utilizing back-office resources to help support call volume as needed.			

Figure 14: Customer Contact Center Minimum Staffing Guide

The Companies' use their IVR system, websites, and mobile views to provide timely outage and estimated time of restoration information to customers by interfacing these resources with the Outage Management System (OMS). Customers using the IVR are identified automatically by their incoming phone number if their number is associated with an account. Alternatively, customers may enter an account number to use the automated system. Once customers calling are identified, a global and/or location-specific message may be heard by the customer.

Due to the smaller, contiguous service area at RG&E, customers may hear a global message that also serves as the location-specific message. These messages can be updated in real-time by Customer Contact Center Management using the information provided by the **Assistant Area Commander – Public Information Officer (AAC– PIO).**

Any information received via news release will be appropriately updated on the IVR by Customer Care Center Management within an hour of receiving the release from the **Public Information Officer**. The Companies Customer Contact Center Management have a series of past messages used as templates for crafting upfront greetings; these sample messages include pertinent information that is known, and when used in an event, will be updated to reflect restoration progress. See Appendix A: *Additional Material* for sample messages.

The Companies' upfront message may include global and/or regional restoration times, dry ice, bottled water, or shelter locations, and company website information. The messages are kept within 30 to 90 seconds at maximum, depending on the value of the information that can be provided in the greeting.

During the first hours of a large outage event, the Companies' high volume IVR vendor may be used to answer customer calls. Both general and customer-specific outage information provided by the web and mobile-enabled web pages are unaffected by the use of the high-volume vendor.

Customer Contact Center Manager (or designee) shall, within one hour of each press release issuance:

1. Receive press release from the **Assistant Area Commander - Public Information Officer** for review
2. Review current IVR messaging for any necessary changes/updates for a minimum of the following categories as found in the press release:
    a. Time and Date stamp of message
    b. Storm status/current information on storm
    c. Outage and restoration effort information, if available
    d. Global or regional restoration time, if available
    e. Dry ice/shelter/water – referring to website for specific details
    f. Safety messaging, emergency option, etc.
3. **Customer Contact Center Manager** (or designee) Draft an updated IVR message with above information:
    a. The Company MUST update the time and date stamp, even if the prior IVR messaging is still accurate.
    b. Messages to be no longer than 60-90 seconds in length
4. Implement (start) updated IVR message
5. Documentation of IVR updates (May be completed during post-storm mode) **Customer Contact Center Manager** (or designee)
    a. Press release link
    b. Press release date/time
    c. IVR messaging reviewed date/time
    d. IVR messaging implementation (start) date/time
    e. Transcript of the new IVR message

Customer Contact Center Manager (or designee) shall, in the absence of a press release within an eight-hour period (company may update the IVR more frequently, depending on the company's preferences including changes in ETR's, outage counts or the receipt of additional pertinent information:

1. Monitor the IVR messaging to ensure that the IVR has been reviewed at least one time within every eight-hour period.
2. Review current IVR messaging for any changes/updates of the following categories:
    a. Time and Date stamp of message
    b. Storm status/current information on storm
    c. Outage and restoration effort information, if available
    d. Global or regional restoration time, if available
    e. Dry ice/shelter/water – referring to website for specific details
    f. Safety messaging, emergency option, etc.
3. **Customer Contact Center Manager** (or designee) Draft an updated IVR message with the following parameters and required items:
    a. The Company MUST update the time and date stamp, even if the prior IVR messaging is still accurate.

   b. Messages to be no longer than 60-90 seconds in length
4. Implement (start) updated IVR message
   a. Documentation of IVR updates, in instances of no associated press release **Customer Contact Center Manager** (or designee) IVR messaging reviewed date/time
   b. IVR messaging implementation (start) date/time
   c. Transcript of the new IVR message

See Appendix A: Sample IVR messages

The decision to move to the high volume IVR vendor will be at the discretion of the **Customer Contact Center Manager** or designee and will be situationally influenced by items including current and expected call volumes, day of the week, time of day, and magnitude of the outage event. The primary driver will be an assessment to avoid the possibility that customers would receive a busy signal upon calling the Companies. When this technology is in use, customers may still enter trouble tickets for outage situations and hear upfront messages.

Once regional and/or local ETRs are established, if not already done, the **Customer Contact Center Manager** or designee will switch back to the in-house IVR solution.

During events, the IVR upfront messages available to customers will be adjusted appropriately by the **Customer Contact Center Manager** or designee. If necessary, such as a severe Class III event or unpredicted event, customers calling for non-emergency reasons may be asked to call after the event has been managed and emergency call volumes have been reduced or seek information through other means.

During significant events, based on incoming call volumes and the need to prioritize emergency callers, the **Customer Contact Center Manager** or designee is responsible for determining the need to issue a message on the IVR advising customers with general, non-event related requests, either hold their request until after the event or consider using other contact methods such as online services (a message template is found in Appendix A: *Additional Material*).

For customers calling about an emergency, there is an option to speak to a live representative. The **Customer Contact Center Manager** or designee will add a message within the IVR system advising customers if ETRs are not yet available and advise the callers to check back later. The circumstances that this message would be utilized are not common and would include but not be limited to Class III events, emergencies affecting large numbers of customers in one part of the service area, unplanned events, or events where limited staff are onsite due to the time of impact.

Customers with a life support and/or a life-threatening emergency are given the option through the IVR to indicate that they have a life-threatening emergency. They are also advised to call 911. If the customer selects that IVR option, they are routed directly to a representative. Customers who have pre-identified as requiring life-sustaining equipment may also choose to use the dedicated phone number provided to them upon enrollment in the program.

When customers speak to a representative, the **Customer Contact Center Representative** verifies the phone number(s) that is associated with the account. This will allow the majority of customers to use automated services; the websites also offer customers the ability to associate phone number(s) with their account(s). Customers using the website or mobile view may access account-specific

information using their phone number associated with the account or their account number. A customer may also gain event information from text alerts if the customer is enrolled in the Companies' *Outage Alerts Program*. If a Life Support Equipment Customer contacts the Customer Contact Center, the Companies' representative will verify both the customers' main and alternate contact information.

Companies' Customer Contact Center Management have a series of past messages used as templates for crafting upfront greetings; these sample messages include pertinent information that is known, and when used in an event, will be updated to reflect restoration progress. See Appendix A: *Additional Material* for sample messages.

Life Support Equipment Customers who are not using the dedicated Life Support Equipment Customer phone number and/or customers with a life-threatening emergency are given the option through the IVR to indicate that they have a life-threatening emergency and are advised to call 911. If the customer selects that IVR option, they are routed directly to a representative. Customers who have pre-identified as requiring life-sustaining equipment may also choose to use the dedicated phone number provided to them upon enrollment in the program.

Customers with an outage situation may enter an automated outage ticket, hear information about the outage, or be provided an estimated restoration time if one is available. Customers may also report additional conditions (e.g., limbs on wires, broken poles, low wires, etc.) by requesting a representative. Customers using the website(s) or mobile view(s) may report power interruptions, see lists of current power interruptions, obtain estimated restoration times if available, and view outage maps.

Call volume is managed in-house with technology, including (as needed) linking the Companies' NYSEG and RG&E Customer Contact Center locations to allow increased call volume to be managed by trained representatives. Customer Contact Center Management will make decisions regarding possible virtualization of the centers on an event-specific basis.

8.1.1 Customer Contact Center Situational Awareness Communications

To enable **Customer Contact Center Representatives** to communicate timely and accurate information to customers, the Companies have developed methods and tools to keep representatives informed during an event. **Customer Contact Center Representatives** are provided with news releases, talking points, and other information obtained through the **Assistant Area Commander – Public Information Officer** or designee regarding the event. **Customer Contact Center Representatives** may receive information about services that are available such as dry ice and bottled water, if appropriate; and material provided to customers via the web site, social media, outbound call campaigns, or any other electronic medium deemed relevant for customer communication.

Information is posted on internal news databases, sent via email, and printed to be available to representatives and other customer service staff.

The Companies' IVR telephone equipment and all other systems are monitored by the Customer Service, Operational SmartGrids and Information Technology (IT) teams to ensure strong performance, particularly the **IT Coordinator** if activated at Area Command. The IT team has staff available at all times through any event to ensure immediate response to telephony or system issues.

8.2 Website, Social Media, Proactive Email and Outage Alerts

The Companies' web section tab, "Outages," can be accessed via computer, tablet, or mobile phone. 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, and shelter locations, etc. Use of the website is generally promoted via news releases during outage events and via messaging in the IVR.

During a Level III event or as necessitated by the event, a special event page is inserted as the home page for the Companies' websites. This will alert customers to additional information that is available via the website. When applicable, dry ice/bottled water and shelter pages will be updated at least every eight hours between the hours of 7 am and 10 pm by the **Website Coordinator**; if no changes are made, the **Website Coordinator** will, at minimum, provide an updated timestamp. Final timestamp update will be no earlier than 10pm each evening and the first update will be no later than 7am the next morning. In the event that there is a website issue, the **Website Coordinator** will update the website(s) home page to note any known issues related to ETR information and when updated information can be expected once known; or the **IT Coordinator** will arrange for general notifications on the site if the web outage is more widespread. In the event that the entire website becomes unavailable, the Companies, at the direction of the **Assistant Area Commander – Public Information Officer** or designee, will use alternative communications methods to disseminate information. Alternative channels may include: traditional and social media, emails, the AVANews blog and other platforms separate from the website.

The **Assistant Area Commander – Public Information Officer** or designee will be responsible for spot-checking the accuracy of two event-related webpages during an incident. The homepage transitioned to an event page, and the outage news section are where event-related news releases are posted. Additionally, the **Assistant Area Commander – Public Information Officer** or designee will spot-check activities in the **Public Information Officers'** electronically stored document location. See Section: 8.7.3 *Media Contacts* provides further detail on this process.

For outage alerts, customers can choose to receive a phone call, text, and/or email notification for the following conditions:

- If the Companies are tracking severe weather that could cause power outages in their area
- If a power outage is detected, with the estimated time of restoration (once available)
- If the estimated restoration time changes
- Once power is restored

Once enrolled in *Outage Alerts*, customers can also text STATUS anytime for an update and text OUT to report an outage. In addition, customers also can set up notification and quiet periods according to their preferences. The **Assistant Area Commander – Public Information Officer,** promotes this service during outage events; the Customer Communications Department promotes this service throughout the year.

8.2.1 Social Media

The Companies routinely monitor social media of County Emergency Operations Centers, municipal officials, and mentions by the public and use X, formerly known as Twitter, and Facebook to build a network of followers extending the reach of key event messages. X and Facebook will be used during major events to provide (as applicable):

- Links to event news releases
- Phone numbers to report power interruptions

- Safety information
- Dry ice/water distribution information
- Shelter locations
- Restoration progress
- Estimated restoration times
- Contact information
- Information obtained from County Emergency Operations Centers or other officials as warranted

Upon activation, the **Assistant Area Commander – Public Information Officer** will activate the **Deputy Public Information Officer** and **Social Media Coordinators** to manage social media messaging. Together they will determine the time that the social media accounts will be actively communicating. During an event, the Companies will post updates during times that the social media team is actively engaged.

During an event, the **Social Media Coordinators** will monitor Twitter and Facebook for mentions of the Companies to identify customer concerns and needs. The **Social Media Coordinators** will forward any safety or health related concerns to the **Incident Commander** or **Critical Needs Branch Director** (or their designee) as appropriate**.** The **Social Media Coordinators** will also contact the **Assistant Area Commander – Public Information Officer** to determine if there are specific officials and/or organizations to monitor, based on any specific event details.

The **Assistant Area Commander – Public Information Officer,** may work with the **Assistant Area Commander – Public Liaison Officer** to determine these groups. Trends are communicated to the Companies' Public Information Office Team, who then use the information to adjust or modify news release content and/or other information to help enhance customer communications.

The **Critical Needs Branch Director** will ensure individual customer inquiries are responded to (as appropriate), while more critical inquiries such as medical conditions, wires down, or other circumstances that need special attention are referred to the appropriate Incident Command System branch.

The use of additional social media and communication channels is a continually developing area. Customers are now able to sign up for *Outage Alerts* by text, email, or phone. The alerts notify customers of power interruptions, estimated restoration times, and restorations. This service is promoted through various channels.

During a major outage event, the **Assistant Area Commander – Public Information Officer** is responsible for determining the cadence and issue of customers' emails (for customers for whom we have email addresses), preferably on a daily basis, in areas that may be affected by power interruptions. After the initial weather event, emails may include information from the news releases including but not limited to any global restoration times and ways customers may obtain updates on ETRs and any local dry ice locations.

8.2.2 Public Information Office Guidelines

The **Public Information Officer** monitors conditions and facilitates the dissemination of information during an event. The **Assistant Area Commander – Public Information Officer,** will follow the pre-emergency event timeframe. They are responsible for monitoring information from the Companies' contract weather service providers. When the weather reports and prediction models indicate threat levels that could cause significant outages, per the direction of the **Area Commander** or the **Area Commander – Deputy,** the **Assistant Area Commander – Public Information Officer** or their

designee will activate and engage their team. Team-member roles and responsibilities are outlined below.

Under the direction of the **Assistant Area Commander – Public Information Officer** or designee, the **Website Coordinator** will:

- Ensure pre-event (preparedness) images are available for the home page and display as directed by the **Assistant Area Commander – Public Information Officer**.
- Post the pre-event news release(s) (statewide and multi-division as appropriate) to outage news pages.
- Update the website(s) and the home page(s) as appropriate upon approval from the **Assistant Area Commander – Public Information Officer.**
- If no event occurs and the pre-event phase is no longer in effect, return the homepage to the non-event image upon approval from the **Assistant Area Commander – Public Information Officer.**

During an emergency event, the **Website Coordinator** will perform the following, with the **Assistant Area Commander – Public Information Officer** responsible for ensuring that the site remains current:

1. Place appropriate event image on the homepage(s)
   - On a daily basis, ensure outage reporting and information links are provided on the home page(s) and can be accessed in several ways.
   - Receive and post any event-specific procedures or information from the **Assistant Area Commander – Public Information Officer** or their designee; topics could include flood, fire, or other emergency communications.
   - Update Outage section with links to any additional information as applicable to the event, which may include but not be limited to:
     a. Shelter locations
     b. Dry ice / bottled water locations
     c. Flood instructions
     d. Fire instructions
     e. Generator safety
     f. Downed wire safety
     g. Global estimated times of restoration

2. When updating pages listed from a through g above, or any other time-sensitive information, the **Website Coordinator** will place a timestamp, at minimum every twelve hours, on the page indicated for when updates are posted. They will gather information for shelter, dry ice, and bottled water from the **Dry Ice/Bottled Water Coordinator** or designee. Pages providing customer ETRs, such as the outage map and list, will populate with updates automatically approximately every 15 minutes.
3. Place all storm-related news releases on the *Outage Central News* page upon issuance.
4. Provide the **Assistant Area Commander – Public Information Officer**, Customer Contact Center Management, **Public Liaison Officer** (if activated), and other appropriate Area and Incident Command Staff links to sites and copies of information when updated throughout the event.

Post Event Activities of the Website Coordinator:

1. Gather screenshots of updated outage Web pages for documentation as appropriate.

2. Working with the **Assistant Area Commander – Public Information Officer** to determine the appropriate time to revert Website to pre-storm homepage graphic.
3. Revert all *Outage Central* pages and update dry ice/bottled water distribution and shelter location pages to indicate closure.

8.3 Contacting Life Support Equipment Customers

The Companies shall make every reasonable effort to provide emergency assistance to Life Support Equipment customers in the event of loss of electric service. This includes members of a household, not exclusively the customer of record and/or multiple dwelling accounts that are in the landlord's name, with a tenant requiring life support equipment. However, the ultimate responsibility for uninterrupted sources of power rests with the individual, and these procedures do not change that ultimate responsibility.

The core program is primarily managed and maintained during the normal course of business. Program objectives are:

- Identify all persons dependent on life support equipment as defined in Section 8.3.1: *Definitions Life Support Equipment* requiring electric service.
- Label the customer account within three 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 the residential Life Support Equipment customer list.
- Update contact lists (including verifying main and alternate contact numbers) at least semi-annually by the Customer Advocate group.
- Continue the emphasis on customer responsibility.
- Implement life support protocols and procedures to be followed in the event of loss of electric service.

8.3.1 Definitions: Life Support Equipment

16 NYCRR § 105.4(b) (9) defines Life Support Equipment Customers as those customers who require electrically operated machinery to sustain basic life functions. This includes: (designated) electrically operated medical equipment, prescribed by a qualified physician, to be used on a continuous basis, or as circumstances require, as specified by the physician to avoid the loss of life or serious medical complications requiring immediate hospitalization.

The following list of Life Support Equipment includes but is not limited to:

- apnea monitors for infants
- cuirass respirators
- hemodialysis machines
- intravenous feeding machines
- intravenous medical infusion machines
- oxygen concentrators
- positive pressure respirators,
- respirators/ventilators
- rocking bed respirators
- suction machines,
- tank type respirators

8.3.2 Event Protocol for Life Support Equipment Customers

The following section outlines the procedures used to communicate with Life Support Equipment Customers both prior to and during an event, as well as the tracking of contacts.

8.3.2.1 Pre-Storm Calls

When the **Area and/or Incident Commander(s)** anticipates power interruptions may last 24 hours or longer, the **Assistant Area Commander – Customer Needs** will request that the **Critical Needs Branch Director** ensure automated outbound pre-storm calls and text messages be made to Life Support Equipment Customers deemed to be in the path of the storm. The purpose of the automated contacts is to provide the following information (if applicable):

- Potential for storm-related power interruptions,
- Awareness to plan accordingly and to consider making alternate arrangements if there is a health or safety risk,
- High level, the generic expected duration of the event,
- Where to find shelter information if available,
- Bottled water and dry ice locations if available,
- Advise if emergency assistance is needed to call police, fire or 911,
- Provide applicable company phone numbers.

The **Critical Needs Branch Director** will ensure the entire Critical Needs team is notified of the pre-storm actions taking place, to ensure staffing is available if needed.

8.3.2.2 Actions Taken During an Outage Event

The **Critical Needs Branch Director** is responsible for ensuring that, at a minimum, 80% of affected Life Support Equipment Customers will be contacted within 12 hours from the start of the event, and Life Support Equipment Customers that were unable to be contacted will have at least two contact attempts made within those 12 hours with a minimum of one hour between attempts. This effort will continue each day until power to the last affected LSE customer has been confirmed restored and will also be tracked on a daily basis and reported as requested.

The **Critical Needs Branch Director** is also responsible for ensuring 100% of affected Life Support Equipment Customers will be contacted or referred to an emergency services agency (e.g., emergency operations centers, police, fire) within 24 hours of the start of the event. This effort will continue each day until the last affected LSE customer has been restored and will also be tracked on a daily basis as compliance will be measured on daily performance.

A contact of a Life Support Equipment customer shall be defined as:

- A personal telephone phone call where the Utility company physically speaks with the Life Support Equipment customer, the Life Support Equipment customer's designated emergency contact, or a person at the Life Support Equipment customer's premise, or
- An automated telephone call to provided contact numbers where there is an interactive response (as the technology becomes available), or
- A text message provided to contact numbers with an interactive response (as the technology becomes available), or
- A documented site visit performed by a Utility company representative.
    - If no one answers the door or otherwise responds to the visit; this shall satisfy the wellness visit requirement for that 24-hour period

Once an event is deemed to be a Class II or III event and at the direction of **Assistant Area Commander – Customer Needs** or designee, the Critical Needs Branch will be activated, and the following will be performed for Life Support Equipment Customers impacted by the event:

- The **Critical Needs Branch Director** shall begin the process to initiate daily contacts to Life Support Equipment Customers as soon as they are aware that a Life Support Equipment customer is impacted provided electric power has not been already restored by activating the **Critical Needs Outbound Callers**. There is a minimum of six **Critical Needs Outbound Callers** on call each week.
- The **Critical Needs Branch Director** or designee shall run a report identifying all Life Support Equipment Customers. This report will highlight any notifications and incidents of an outage, voltage problem, flicker, or partial power, which involves a Life Support Equipment customer. The report shall be updated to reflect the most recent information every four hours (except between the hours of 10 pm and 6 am) during the first twenty-four hours of an event and each day thereafter until the last affected LSE customer has been confirmed restored.

The **Critical Needs Coordinator** shall use the Critical Needs Outbound Call Minimum Staffing Level (Figure 15: *Critical Needs Minimum Staffing Levels*) to assist in determining staffing. If the staffing level needed to make calls is greater than the number of **Critical Needs Outbound Callers** activated, additional trained resources shall be activated by the **Critical Needs Coordinator**. The support staff will be expanded or contracted based upon need.

Staffing Levels Required to Call / Field Visit Life Support Equipment Customers Based on a Six-Hour Time Frame		
Life Support Equipment Customers Affected	**Minimum Range Staffing Office**	**Minimum Range Staffing Field**
1-50	1	1-3
50-100	1-2	1-7
100-150	2-3	1-9
150-200	3-4	1-11
200-250	4-5	1-13
250-300	5	1-15
Note: Staffing levels are based on LSE customer counts versus event levels as LSE counts vary by service area location.		

Figure 15: Critical Needs Minimum Staffing Levels

The **Critical Needs Coordinator** shall oversee telephone attempts to each affected Life Support Equipment customer.

- Each Life Support Equipment account is assigned to a **Critical Needs Outbound Caller** or designee to call.
- The **Critical Needs Outbound Caller** or designee shall maintain contact with all affected Life Support Equipment customers on a daily basis until the last affected Life Support Equipment customer has been confirmed restored.
- If the Life Support Equipment customer cannot be reached using the first contact number, attempts shall be made to all emergency contact numbers the customer has provided. The purpose of the outbound call is to provide the following information (as applicable):

1. Scope of the interruption.
2. Expected duration of the event provide an ETR specific to their location if available.
3. Information on where to find specific ETR for their address if available.
4. Sources for emergency services such as shelter locations, if applicable.
5. Sources for emergency services such as bottled water and dry ice location information, if applicable.
6. Encourage customers to call 911 if they are facing an emergency.

- Results are documented in the outage tracking spreadsheet.
- Each round of calls has a new tab on the spreadsheet, so the caller can see the results of the previous calls and/or field visits.
- If a Life Support Equipment customer calls into the Customer Contact Center and speaks with a **Customer Contact Center Representative** who then completes the Life Support Equipment contact guidelines questionnaire within the required contact time period, including notating the contact time on the customer's account information, then the Critical Needs Outbound Caller will take the notated comments and update the contact spreadsheet accordingly without requiring a repeat call with the customer.
- Life Support Equipment Customers with power calling into the Customer Contact Center or the unlisted Life Support Equipment line to report an event-specific concern that affects their ability to receive service (including access to and from their residence such as a wire down and identifies the Life Support Equipment status) will have their immediate need entered into CRM-B by **Customer Contact Center Representatives.**
    - This information will then be sent via email, phone call, or an inbox referral to the Customer Advocate who will further review the account to determine if any additional follow up is needed and will maintain a log of the accounts received.
- The **Critical Needs Outbound Callers** (and designees) are trained to use the information in the Life Support Customer Contact document (Appendix A: *Additional Material*) when making outbound calls to Life Support Customers during an outage.
- The **Critical Needs Outbound Caller** (or designee) is responsible for addressing the concerns of Life Support Equipment Customers during the interruption and will escalate concerns to the **Critical Needs Coordinator** if they are not able to address it themselves.
- **The Critical Needs Coordinator** will determine how to respond to the concern, escalate to the appropriate area, resolve the concern, and follow up with the customer. In a situation where the concern is not immediately resolved, the **Critical Needs Coordinator** will follow up with the appropriate area every two hours until resolution is made, and the customer contacted.

Following each daily call attempt cycle, the **Critical Needs Branch Director** shall review the contact logs, update the customer field check template, and initiate field visits to each affected Life Support Equipment customer who has not been contacted.

- The **Critical Needs Branch Director** shall arrange for field visits, via company personnel or third parties (Emergency Operations Centers, first responders or other human service entities).
- All customers remain on the list for continued phone attempts even when the account has been referred for a field visit. Updates on field visits are part of the report sent to the DPS every four hours.

Field visits shall be arranged as follows:

If Company personnel are engaged:

- The **Critical Needs Branch Director** will coordinate with the **Assistant Area Commander – Customer Needs** or designee to arrange visits by Company personnel.
  - Referrals for field visits are made after outbound calls are completed or otherwise as needed.
  - A point-of-contact will be established at the Incident Command site to collect and provide the field check status, using the Life Support Equipment customer field check template, to the **Critical Needs Branch Director** in four-hour intervals.
- **If external personnel are engaged**:
  - The referrals to Counties/third parties will be made by the **Critical Needs Branch Director**, using a contact provided by the **Public Liaison Officer**. The **Public Liaison Officer** will obtain a third-party contact from the County Emergency Operations Center or their designee for the affected County/Counties.
  - The **Critical Needs Branch Director** will provide the county/third party contact(s) with the list of customer locations requiring a field check as part of the Life Support Equipment Customer Field check template for completion. Requests for third party field visits are done within 24 hours from the start of the storm) and then as needed to ensure daily contact with the customer. Referrals will be sent to third parties no later than 8 pm.
  - **The Critical Needs Branch Director** is responsible for ensuring results are received. If the Emergency Operations Center contact does not provide updates, the **Critical Needs Branch Director** will attempt to reach the Emergency Operations Center contact. If unsuccessful, the **Critical Needs Branch Director** will escalate the request to the Emergency Operations Center leadership, using the **Public Liaison Officer** as a point of contact. The **Public Liaison Officer** or designee shall attempt to make phone and/or email contact with Emergency Operations Center leadership to ensure lack of information on field visits is acknowledged in the interest of working to resolve this issue.
  - When results are received from the field (Company visits and referrals), the **Critical Needs Branch Director** will provide the information to the **Critical Needs Coordinator** who will update the outage tracking spreadsheet.

Customer Opt-Out

Contact with the LSE Customer household will no longer be required, only for that particular event, if the emergency contact, household member or LSE user indicate:

1. The LSE user is deceased
2. The LSE user is not at the premises and will not be returning until service is restored (e.g., out of state for the winter)
3. They have been provided an ETR and are requesting no further contacts

Whenever a customer opts-out of future contacts, a detailed note will be placed on the account and in the outage tracking spreadsheet.

8.3.2.3 Restoration Confirmation

If the Companies have not already verified restoration with the customer during the emergency, the **Critical Needs Outbound Caller** will call each affected Life Support Equipment Customer to confirm power has been restored. The **Critical Needs Branch Director** will use the restoration information

provided in ICDS and the **Critical Needs Outbound Callers** attempt to make phone contact to verify the customer has been restored. An automated outbound call with a response option may be used to verify restoration.

8.3.3 Program Maintenance: Update Life Support Equipment Listing

A weekly report identifying all Life Support Equipment Customers by Division is generated by the Business Support and Solutions Department and is available at any time.

When Customer Service personnel are advised of life support equipment being used 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 by a Customer Advocate or designee establishing participation in the program. In addition, the customer is provided an unlisted phone number to be used during outages and reiterating the customer's responsibilities, and the meter is marked at the customer premises.

Attempts to update and verify Life Support Equipment customer information is done at least twice a year initiated by the Customer Advocate Supervisor. Additionally, individuals on the Life Support Equipment Customer listing are validated every time there is an interaction on their account.

This update includes:

- Verifying customer contact information (daytime number, evening number, and mobile phone numbers are requested).
- Contact information for two emergency contacts and a plan if an emergency arises.
    - The first attempt is via a renewal survey mailed to the customer; if no response is received, a reminder letter is sent.
    - In addition, the Companies will make a second outreach attempt via an outbound phone call. The purpose of the call will be to determine if there have been any changes to any of the information previously provided.

The **Manager- Revenue Recovery** will submit a letter each year to the DPS Director of the Office of Resilience, Utility Security, Nuclear Affairs and Emergency Preparedness or designee certifying that the semi-annual update has been completed.

Once an account is certified as Life Support Equipment, certification remains in effect for the life of the account until terminated via *the Life Support Equipment Code Removal Process* as agreed upon by the PSC.

8.4 Contacting Special Needs Customer

Customers defined as meeting "special needs" will be identified and receive targeted messaging as appropriate to the event status. This section details the Companies' processes to identify, track, and communicate to this group.

8.4.1 Definition: Special Needs Customers

16 NYCRR § 105.4(b) (9) defines Special Needs Customers as; the elderly, the vision-impaired, the hearing and speech-impaired, the mobility impaired, and human service agencies representing these customers. Additionally, customers with a medical emergency will be included in this category. A Medical Emergency is defined in 16 NYCRR § 11.5(2) and is considered to exist when a resident of a customer's residence suffers from a serious illness or a medical condition that severely affects their well-being. A medical emergency is often a temporary situation as described in 16 NYCRR § 11.5(4)

(i) whereby a medical doctor, or qualified official of the local board of health, states in writing to the utility the expected duration of the medical emergency and explains either the nature of the medical emergency or the reason why the absence of utility service would aggravate the medical emergency. When the **Area and/or Incident Commander(s)** anticipates power interruptions may last 48 hours or longer, **the Assistant Area Commander – Customer Needs** will request that the **Critical Needs Branch Director** ensure automated outbound pre-storm calls be made to Special Needs Customers deemed to be in the path of the storm. The purpose of the automated outbound call is to provide the following information (as applicable):

- The potential for a storm-related outage.
- Advise them that they should consider arranging alternate accommodations if an outage poses a health or safety risk.
- Refer the customer to the appropriate website for shelter locations if applicable.

8.4.1.1 Actions Taken During an Event

When an outage is expected to last longer than 48 hours and at the direction of **Assistant Area Commander – Customer Needs** or designee contact with Special Needs Customers will be initiated by the Outbound Call Coordinator for those experiencing electric power interruptions or other power quality concerns (e.g., low voltage).

During the outage, the **Critical Needs Recorded Call Coordinator** or designee will run a report identifying all Special Needs Customers in the affected areas and will arrange automated outbound calls to these customers. The purpose of the outbound call is to provide the following information (as applicable):

- Expected duration of the event.
- Information on where to find specific ETR for their address if available.
- Sources of emergency help (shelter, bottled water, and dry ice locations, if available).

The **Outbound Call Coordinator** will ensure daily-automated outbound calls continue to the impacted Special Needs Customers until the customer's power has been restored.

8.4.1.2 Program Maintenance: Updating the Special Needs Listings

Special Needs customer lists are updated on an on-going basis, including semi-annual written notices, through the Companies' annual *Residential Rights and Responsibilities* emailing and bill insert, requesting customers to contact us if there is any change to their situation or if there is a need to update contact information. Additionally, individuals on the special needs listing are validated every time there is an interaction on their account.

8.5 Contacting Critical Facilities

Customers defined as meeting "Critical Facilities" status will be identified and receive targeted messaging as appropriate to the event classification. This section details the Companies' processes to identify, track, and communicate to this group.

8.5.1 Definition: Critical Facilities

Critical Facilities are defined as those facilities from which essential services and functions for survival, the continuation of public health and safety, and disaster recovery are performed or provided. Critical Facilities plan for continuous electric service to ensure business continuity or

continuity of government. Electric service will be maintained through uninterrupted utility service or a momentary interruption followed by a transfer to backup generation. Critical facility owners are responsible for their own backup generation and appropriate fuel. Critical Facilities and their prioritization are listed in Section 7.2.4.2: *Critical Facility Restoration Priorities*.

8.5.1.1 Pre-storm Calls

When the **Area and/or Incident Commander(s)** anticipates power interruptions may last 48 hours or longer, the **Assistant Area Commander – Customer Needs** will request that the **Critical Needs Branch Director** ensure automated outbound pre-storm calls be made to Critical Facilities deemed to be in the path of the storm. The purpose of the automated outbound call will be to provide the following information (as applicable):

- The potential for a storm-related outage
- Encourage the facility to closely monitor weather forecasts

8.5.1.2 Actions Taken During an Event

When an outage is expected to last longer than 48 hours and at the direction of **Assistant Area Commander – Customer Needs** or designee contact with Critical Facilities will be initiated by the **Critical Needs Outbound Caller** for those experiencing electric power interruptions or other power quality concerns (e.g., low voltage).

When contact with a critical facility is made, the **Critical Needs Outbound Caller** will (as applicable):

- Advise the facility of the expected duration of the event
- Provide the electric emergency phone number if the facility personnel have additional questions or need assistance
- Determine if the facility is operating a generator
- Inquire about any special issues or concerns the facility has and forward these on to the **Assistant Area Commander – Customer Needs** to provide to the **Public Liaison Officer** or designee

The **Critical Needs Outbound Caller** will contact Critical Facilities daily throughout the event to provide updated information and address any issues the facility may have.

8.5.1.3 Restoration Confirmation

If the **Critical Needs Outbound Caller** has not already verified restoration with the customer during the emergency, the **Critical Needs Outbound Caller** will place an outbound call to each affected Critical Facility to try to confirm power has been restored.

8.5.2 Program Maintenance: Update Critical Facility Listing

A report identifying all Critical Facilities by Division is generated by the Business Support and Solutions Department weekly and incorporates any updates made in the prior week. Semi-annually the Companies' Government & Community Relations Department will provide County Offices of Emergency Management staff Critical Facilities lists to review. All modifications (additions, deletions) shall be captured and incorporated into revised lists that will be provided to the County. As an alternative, the **Public Liaison Officer** or designee will provide the list to the County Emergency Operations Center via email for review and verification if a County declines the New York Government & Community Relations Department's meeting request. The Critical Facilities list will

also be provided to municipalities upon request to the Government & Community Relations Department.

8.6 Providing Dry Ice and/or Bottled Water to Customers

If service interruptions are expected to last more than 48 hours, the **Area Commander** or designee will assess the need for implementation of a Dry Ice and/or Bottled Water Program.

When the Companies are in a pre-event phase of an emergency and forecasting an event to have the potential to create a considerable number of power interruptions, (that may last more than 48 hours), the **Dry Ice Bottled Water Coordinator** or designee will arrange to initiate the procedure to acquire dry ice before the event occurs. If dry ice supply is either inadequate to fulfill the amount needed or unavailable, the **Dry Ice Bottled Water Coordinator** or designee will contact alternate vendors, (following the same process) to secure supplemental or full amounts of wet ice for the event. For unpredicted events with interruptions that may last more than 48 hours, the Companies will secure dry ice, as soon as possible for distribution and will consider the use of wet ice until dry ice can be brought into the affected area. This early deployment will improve the ability for the Companies to have ice and make it available for distribution 24 hours from the start of restoration.

Under the direction of the **Assistant Area Commander – Logistics**, the **Dry Ice/Bottled Water Coordinator** will perform the following:

- During pre-event contact identified suppliers and ascertain availability of dry ice.
- Identify the resources necessary to execute a dry ice operation.
- Obtain area(s) of impact and estimated duration of power interruptions.
- Coordinate with **Assistant Area Commander – Public Liaison Officer** or designee to identify distribution sites.
- Estimate the amount of dry ice to be distributed by considering/assessing the number and location of out-of-service customers, estimated event duration, and utilization rates from the experience(s) of prior events. Amounts of dry ice are delivered based on supplier requirements, availability of supply, as well as, timing of need for the distribution operation. In many instances, dry ice estimates are developed prior to event impact to ensure the availability of material based on an approximation of 20 pounds of dry ice per customer to inform estimates. Once event impacts are known, if additional dry ice is needed, the **Dry Ice/Bottled Water Coordinator** will make additional requests.
- Assign trained personnel to distribute dry ice, provide informational sheet (i.e., "NYSEG RGE Dry Ice Broc.pdf"), and/or bottled water to municipalities at staging areas designated by the company. Personnel may arrange for vehicles to deliver dry ice and/or bottled water to municipalities pending resource availability.
- A safety orientation for all employees and contractors before they handle dry ice
- The **Public Liaison Officer or designee** will reach out to the County Emergency Management offices requesting they determine appropriate distribution locations and relay that information to the **Dry Ice/Bottled Water Coordinator**.
- The **Dry Ice/Bottled Water Coordinator** communicates with those identified distribution center contacts to arrange deliveries and obtain hours of operation.
- Wherever possible, the **Dry Ice/Bottled Water Coordinator** will distribute equitably by equally dividing the shipment to the known local authorities requesting dry ice.

- Provide dry ice/bottled water distribution information to **Assistant Area Commander – Public Liaison Officer,** Public Information and Documentation, and Customer Contact Center Management.
- Monitor status of power interruptions and distribution rate of dry ice and bottled water to estimate additional procurement of the products and distribution.

Records of previously identified dry ice/bottled water distribution locations will be maintained by the **Assistant Area Commander – Public Liaison Officer** and Emergency Preparedness Department and stored on the Companies' *StormCenter* site.

If not previously determined or if the previously identified locations are not convenient to the impacted customers, geographically appropriate locations for dry ice/bottled water distribution and a list of distribution locations shall be established in coordination with the **Public Liaison Officer** or designee, who will coordinate with County Emergency Operations Centers.

8.7 Public and Emergency Management Officials and Media Contact

The **Public Liaison Officer, Liaisons County/Local** serve as part of the Incident Command staff and are primary points of contact for municipal officials for event information exchange, issue resolution and any required activity coordination. Emergency management, municipal officials, and media contacts are given contact numbers to reach the local **Public Liaison Officer** and **Public Information Officer** directly. Individuals have been identified and trained to assist the **Public Liaison Officer** and **Public Information Officer** with these duties during larger-scale events or as needed. Additionally, the Public Liaison Officer, Public Information Officer and Incident Commander(s), or their designee, will work collaboratively to share information between business functions and develop messaging for external stakeholders.

8.7.1 Emergency Management and Municipal Officials Contacts

The Public Liaison and Public Information Officer groups are responsible for establishing and maintaining communications with public and emergency management officials and media in the affected areas during an event.

Event Preparation:

In preparation for an event, the **Assistant Area Commander – Public Liaison Officer**, working with the Customer Contact Center Management, establishes a single point of contact (by shift) in the Customer Contact Center for **Public Liaison Officers** to submit wires down reports from municipalities and/or Emergency Operations Centers so that trouble tickets can be created. The **Assistant Area Commander – Public Liaison Officer,** establishes a cadence for the distribution of Critical Facilities lists that are provided to County Emergency Operations Centers if power interruptions occur. Additionally, **Public Liaison Officers** will establish a single point of contact (by operational period) with the **Incident Commander** for issues that may arise from municipalities. **Public Liaison Officers** have access to iCDS for outage information, power interruptions, crewing, ETRs, and statuses.

Actions Taken During Events:

Response work during an emergency requires collaboration with Emergency Operations Centers, local governments, local law enforcement, and fire services. Critical elements of the Companies' outreach, coordination, and communication protocols are targeted at providing these entities with a consistent, convenient, and reliable mechanism for receiving and providing information during the

response process. It is the responsibility of the **Public Liaison Officer** or designee to execute these tasks. The **Assistant Area Commander – Public Information Officer,** also ensures and maintains communications with the media throughout a major event.

While communications entail a situationally specific approach using a number of channels to varying audiences, for the purposes of this Plan, the Companies have segmented communications requirements into the following channels:

- Calls to the Customer Contact Center
- Website and social media sites
- Electrically dependent life support users
- Special Needs Customers
- Critical Facilities
- Public and emergency management officials.

In a Class I event, a **Public Liaison Officer** will be activated to communicate with County and municipal officials and may activate **Liaisons County/Local** as needed. In Class II or III event, a **Public Liaison Officer** and **Liaisons County/Local** will be activated for communication with municipalities. The **Liaisons County/Local** will be assigned a County Emergency Operations Center, even if County Emergency Operations Center is closed and if the representative is not requested (in some cases, a **Liaison County/Local** may be assigned a municipal Emergency Operations Center as needed). Key public officials will be contacted by the local **Public Liaison Officer** or their designee as soon as possible after the **Incident Commander** determines that a power interruption will extend 48 hours or more. As necessary and appropriate, in addition to municipal conference calls, contacts may include:

- State Senators and Assembly members,
- Elected lead at the County (county executives, chairs of county boards of legislators/supervisor and other county officials),
- Town supervisors,
- City/Village mayors,
- County emergency management directors.

In accordance with PSL § 73-A, the Companies will make notification to an applicable Village, Town, or City Chief Executive Officer (CEO) if widespread prolonged outage affects more than 20,000 customers in the Company's service territory and the municipality contains an emergency response or public safety facility covered by this statute that may be without power for more than 24 hours. Facilities covered under this law must be prewired with an appropriate transfer switch for use of an alternate generated power source and be registered with their county emergency services. It is the responsibility of the covered facilities to ensure they are registered with their county emergency services prior to the widespread prolonged outage event. It is the responsibility of the county to notify the Companies of facilities that meet the criteria in this law. When lists of applicable facilities are received by the Companies, the facility accounts will be designated as a Critical Facility and notification will be made as required under PSL § 73-A. A **Public Liaison Officer** will make the notification in the form of a call, text, or email apprising the Village, Town, or City Chief Executive Officer (CEO) or designee of the affected applicable outages, including any known information about the outage cause or duration.

Regular updates on the status of the response efforts, areas of damage, crewing information, estimated times of restoration, critical facility outages and other pertinent information will be provided by the **Public Liaison Officer** or designee through methods such as municipal conference calls, individual contacts by phone, in person, text message, or email. The local **Public Liaison Officer** or designee will work within the Incident Command Structure to address specific requests and inquiries.

Flexibility must be retained to assign **Public Liaison Officer**s and **Liaisons County/Local** based on the areas most severely impacted. **Public Liaison Officer**s may be assigned to less severely impacted counties based on need and resource availability; **Public Liaison Officer**s may be assigned at the municipal level on an exception basis in the case of highly localized events.

County Emergency Operations Center directors may request that a representative from the Companies be available on-site at a Command Center, an alternate site of their choosing or virtually. The representatives, **Liaison County/Local,** will have been alerted by the **Assistant Area Commander – Public Liaison Officer** or designee prior to the event, as such will be ready to respond as needed and to provide 24-hour coverage if requested.

When an Emergency Operations Center is not opened, the **Public Liaison Officer** and/or their designee will serve as a point of contact for those officials and organizations. Prior to and during an event as the team is expanded, emergency management and municipal officials are given contact numbers to reach the local **Public Liaison Officer** and **Liaison County/Local(s)** directly.

If **Public Liaison Officers** and/or **Liaisons County/Local** in an Emergency Operations Center need assistance with operational/technical issues, they will consult with the **Incident Commander** or designee for the required information. The **Public Liaison Officer** or **Assistant Area Commander – Public Liaison Officer** may also escalate concerns to the **Incident** or **Area Commander** for assistance in addressing the situation. To track outstanding requests or issues during municipal conference calls, a designated **Public Liaison Officer Support Team Member** maintains an issues log to avoid duplication and for use in prioritizing requests with the **Area** and/or **Incident Commander**. The Liaison Team has access to the log through the *StormCenter* site to ensure they are aware of the status of any request.

Liaisons County/Local or designee in the county Emergency Operations Centers are responsible for facilitating requests from local government for line crew and/or clearing resources with the appropriate operating division; providing a list of Critical Facilities to the Emergency Operations Center for its review and prioritization; working with the Emergency Operations Center to determine local and/or county resources that can assist if Life Support Equipment customer wellness check referrals be necessary during the event. The **Liaisons County/Local** will coordinate with county officials to prioritize the restoration sequence of Critical Facilities during a major storm event.

If during a particular event, the Companies need to obtain resources from the county or state; these requests would be coordinated through the assigned **Liaison County/Local** and/or **Public Liaison Officer**. Liaisons will continue to staff the Emergency Operations Center until such time as the Emergency Operations Center Incident Commander or designee determines there is no longer a need.

While in the Emergency Operations Center, **Liaisons County/Local** have access to the Companies' computer system (including iCDS, the OMS reporting tool), which includes, but is not limited to; access to locally- based information, iCDS reporting resources to check outage numbers; ETRs; lists of Critical Facilities identified by local municipalities; Life Support Equipment Customers; outage status; ETRs, and crewing, including crew assignments; and other general communications needs. Records of residential developments with large elderly populations or similarly vulnerable establishments are located on the Companies' *StormCenter* site. (Paper-copy packets of local information will be provided to **Liaisons County/Local** as necessary).

This information will be provided in a way that is easy for the **Liaisons County/Local** to know which jobs are in the county or municipality they are communicating with. The **Public Liaison Officer**

and **Liaison County/Local** have direct dial numbers to the **Incident Commander,** Customer Contact Center Management and **Customer Contact Center Representatives** (for submitting wires down tickets), **Critical Needs Branch Director,** and other Incident and Area Command staff as necessary. **Liaisons County/Local** in the Emergency Operations Center(s) will endeavor to maintain proactive communications with emergency and municipal officials whenever status information is known.

Liaisons County/Local in the Emergency Operations Center will assist the **Critical Needs Branch Director** with Life Support Equipment follow up reports if they are not readily forthcoming from local/county resources conducting wellness checks.

Emergency Operations Centers and municipalities can access outage information through the Companies' website(s) and report wires down and blocked roads directly to the **Liaisons County/Local** in the Emergency Operations Center.

8.7.2 Municipal Calls

The Companies conduct regularly scheduled municipal officials' calls during major events. The purpose of these calls is to inform local, county, state, and federal officials of restoration status and other key information. Municipal calls are designed to serve as brief updates for the affected area(s) as a whole, leaving individual issues to be addressed using other communication avenues, including, but not limited to, municipal liaisons. The Companies encourage municipal officials to report specific issues to their county Emergency Operations Centers such as roads that are blocked by downed electric equipment so that road clearing can be coordinated at the county level.

Depending on the severity of the event and the estimated duration of the event, the Companies will conduct conference calls daily with local municipal and emergency management officials in Divisions that are severely impacted. These calls are scheduled at a regional (Division) level that corresponds with the Incident Command Structure in place for the affected areas. Municipal call activities include:

- Pre-event municipal calls will be held, when an event is expected to be a Class III event or a Class II event where restoration is expected to be 48 hours or longer and impacting greater than 10% of the customers in a Division. The **Assistant Area Commander – Public Liaison Officer** in consultation with the **Area Commander** and/or **Area Command – Deputy** will evaluate the potential event impact to determine if it will meet these criteria.
- During an event, municipal calls will be held in Divisions that are impacted by a Class III event or a Class II event that is expected to be 48 hours or longer and impacting greater than 10% of the customers in the Division.
- In accordance with the ETR Protocols, municipal conference calls will be scheduled within 12 hours of the start of restoration and will be conducted within 24 hours of the start of restoration and continue at least daily until 90% of the affected customers have been restored.
- Municipal call invitations are sent via e-mail by **Public Liaison Officer Support** at the direction of the **Assistant Area Commander-Public Liaison Officer**. A sample municipal call invitation template is found in Appendix A: Additional Material.
- Invitations are sent with as much advance notice as possible given the type, severity and timing of event impacts and will include the date/time of the call, the conference bridge number, agenda, channels to report specific municipal issues and ways to access update through the outage maps or liaisons. Municipal calls will require:
    - Roster of attendees including name and organization
    - A recording of the call
    - A controlled question and answer period

- Acceptable means of conducting Municipal calls will include:
  - Operator assisted
  - Virtual meeting platform such as TEAMS, Webex, Zoom

Government & Community Relations is responsible for maintaining a list of contact names and numbers to be invited to the calls in a central database that is located on the Companies' *StormCenter* SharePoint site. The Director of Government & Community Relations (or designee) will also coordinate with the Director of Federal Governmental Affairs (or designee) to ensure federal government personnel are included in communications and call invitations. Contact information is maintained in a secure municipal contact portal that each municipal contact has access to. Contact information can be updated on an ongoing basis, or as changes occur, Additionally, semi-annually (usually in January and July) the Director of Government & Community Relations (or designee) formally requests municipal contacts review their information and make required updates in accordance with 16 NYCRR §105.4(b) (5).

- Phone calls, text messages and emails may be used to respond to questions and issues from officials regarding the remaining power interruptions.
- **Public Liaison Officers** and/or **Liaisons County/Local** will contact municipal officials in the hardest hit areas to provide updates and address any issues prior to municipal conference calls to the extent possible.
- The **Assistant Area Commander – Public Liaison Officer** will designate an individual from **Public Liaison Officer Support** to document all unresolved questions raised during the conference call in the Municipal Issues Log so they can be tracked through resolution.
- Additionally, **Public Liaison Officers** participate in any county-level emergency management calls that are scheduled and make appropriate contacts with municipal officials in areas likely to be most severely impacted.

8.7.2.1 Sample Municipal Call Agendas:

Municipal Call Pre-Event Agenda

Introductions and ground rules for participation – Public Liaison Officer or designee

- Questions from the participants will be taken at the end of the call
- Questions or comments should be general in nature and that would benefit all participants. Questions regarding specific issues should be directed to your Public Liaison Officer or Local/County Liaison after this call.

Weather Update – Incident Commander or designee

- Weather update and potential impact of weather

Information for the event for the overall service area - Incident Commander or designee

- Overall number of crews being staged including mutual assistance, contractor, service crews, surveyors, etc.
- Coordination of road clearing activities

Health, Wellness and Safety Information – Public Liaison Officer or designee

- The following information can be found on our website:
  - ETR - Estimated Time of Restoration
  - Known shelter locations
  - Dry ice and bottled water locations
  - Press releases
- Safety message

PLO Contact Information
Date, time and call in information for the next briefing – Public Liaison Officer or designee.
Question and Answer Session - Public Liaison Officer or designee

Municipal Call During Event Agenda

Introductions and ground rules for participation – Public Liaison Officer or designee

- Questions from the participants will be taken at the end of the call
- Questions or comments should be general in nature and that would benefit all participants. Questions regarding specific issues should be directed to your Public Liaison Officer or Local/County Liaison after this call.

System information – Incident Commander or designee

- Type of event and geographic areas affected
- Total number of customers affected at the peak of event
- Total number of customers currently without service
- Estimated restoration time of event
- Weather update and impact of weather on restoration

Information for the event for the overall service area – Incident Commander or designee

- Number of customers affected at peak of event by division
- Number of customers restored by division
- Number of customers still out by division
- Final estimated restoration time of event by division
- Overall number of crews being utilized including mutual assistance, contractor, service crews, surveyors, etc.
- Coordination of road clearing activities
- Areas where crews are working (high level, hardest hit areas)
- Areas where crews will be sent next (high level, hardest hit areas)
- Type and extent of damage found in hardest hit areas– number of poles and wires down, worst locations, etc.

Health, Wellness and Safety Information – Public Liaison Officers or designee

- Known shelter locations
- Dry ice and bottled water
- Outreach with Life Support Equipment and Critical Facility customers
- The storm restoration information will conclude with an appropriate safety message to the participants.

PLO Contact Information
Date, time, and call-in information for the next briefing – Public Liaison Officer or designee.
Question and Answer Session – Public Liaison Officer or designee

8.7.3 Media Contacts

Establishing effective communications with news outlets is crucial to response efforts. Every effort is made to provide media contacts with accurate, detailed information. Communications concerning restoration of service will generally be handled by a Company spokesperson. These functions are the responsibility of the local **Public Information Officer** working in conjunction with the **Area Commander – Public Information Officer**, as appropriate. Pursuant to the requirements set forth in the Public Service Commission's regulations (16 NYCRR §105.4(b) (5)), the Companies will update at least semiannually all the contact data included in the Plan. For communications with the media, the Companies may choose to use an external vendor to maintain the list of contacts.

The Companies' website(s) provide a link to their media contacts page on both the "News" and "Contact Us" portions of websites to ensure that all media representatives understand how to contact the Companies' **Public Information Officer(s)**. The **Public Information Officer** contact numbers are available through the Companies' media hotline or by contacting the **Assistant Area Commander – Public Information Officer's** direct phone numbers, which are posted on news releases and the Companies' websites.

8.7.3.1 Development of News Releases and Content:

A portfolio of news release templates has been created and pre-approved by the **Senior Vice President of Corporate Communications**. The templates are stored on the Companies' *StormCenter* SharePoint site in the **Area Commander – Public Information Office** section, and a sample template is provided in Appendix A: *Additional Material*. The **Area Command – Deputy** or designee will review and provide final approval of all news releases provided by the **Assistant Area Commander – Public Information Officer** or designee.

These templates serve as foundational documents and are intended to expedite the development of news releases during an event, with the understanding that event-specific information will be customized by event. News releases will, as determined by the **Area Commander – Public Information Officer**, contain information related to:

- Social media links/handles,
- Details of the storm or event and damage anticipated, occurring or occurred,
- Area-specific restoration information, ETR, affected number of customers, affected areas (clearly stating the regions and counties covered),
- Outage reporting instructions,
- For the areas that remain without power, communicate how many customers are without power and highlight what work is taking place to restore power, including any special difficulties being faced.
- Safety precautions pertaining to downed wires and other damaged electric facilities,
- Contact numbers to report outages and downed wires,
- 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 personnel dedicated to storm response efforts,
- The names of any other utilities or regions that are providing assistance,
- Information about the type of ice (dry or wet) and/or bottled water distribution sites and where to find information regarding emergency shelter locations, if available,
- Information about frozen pipes and the 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 and,
- Media contacts and who to call for media inquiries related to the release.

Additionally, the Public Information Officer, or designee, will gather storm impact and restoration information from Operations and others on the Area and/or Incident Command team through methods such as participating in storm strategy calls and one-on-one communications. This information is used to develop consistent messaging for press releases and other communication channels. When events occur in non-contiguous portions of the service area (for example the Lancaster and Brewster Divisions), the Companies will issue separate news releases as appropriate. Once Regional and local ETRs are issued, reporting of the Global ETR will terminate.

8.7.3.2 Dissemination of News Releases

During emergencies, appropriate information is provided to the media. News releases and/or media statements will be provided within the first 12 hours of the start of restoration for outages expected to last longer than 24 hours, synchronized with accepted media cycles (7 am, Noon, 5 pm, and 11 pm) with another update provided within 24 hours. Additional media contact will be made according to available updates on event conditions or the Companies' response. Contacts with the media will be documented by the **Assistant Area Commander – Public Information Officer** or designee using the *Media Contact Log Sheet* where practical. The dissemination for news releases by the **Assistant Area Commander – Public Information Officer** or designee among other activities, will be documented via a digital copy of the news release and/or confirmation page.

As events warrant, there may be situations that necessitate additional communications in the form of news releases outside of the normal media cycles, as indicated above. Situations that necessitate additional communications include but are not limited to a change in the global ETR. If during the event, additional news releases are warranted, the **Public Information Officer** will draft the message and escalate approval up through the **Area Commander or Incident Commander** or designee (if Area Command not activated).

The **Assistant Area Commander – Public Information Officer** is responsible for maintaining a checklist of responsibilities and activities for the Public Information Officer group.

The **Public Information Officer** is responsible for following a daily *Public Information Officer Checklist*. The checklist describes activities relating to news releases, content accuracy, and social media messaging.

9. CONTINUITY OF OPERATIONS

The Companies maintain Business Continuity plans for all business areas. These plans detail actions to be taken by the respective areas in case of loss of technology or other resources. These plans are maintained by the Business Continuity Liaisons for each department and are filed in a centralized department within the Physical and Cyber Security business area. Included in these plans are actions taken by the Companies Information Technology and Operational Smart Grids organizations to restore technologies. Specific to the Companies' Emergency Response Plan, the business continuity plans address:

- Loss of telephony and software systems and buildings for the Energy Control and Customer Care Centers, including use of back-up Centers and backup systems, including non-electronic alternatives.
- Loss of telephony, radio and software systems and buildings for the Electric Field Operations including use of back-up locations and back-up systems, including but not limited to non-electronic alternatives for actions such as outage management, wires down management and collection and integration of damage assessment information. Loss of online access to data, including lists of critical facilities, life support customers and elected officials, municipal leaders and other governmental officials, and processes to manage communications to affected groups during an event.
- Loss of public-facing communications tools, such as the website, text alerts, IVR or social media sites and alternate ways to communicate critical information to affected stakeholders.

In cases of system losses, Area and Incident Command teams would reference their respective Business Continuity Plans to continue event readiness and response efforts.

10. AFTER AN EMERGENCY

Once restoration has been completed, the Companies conduct 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 will be conducted and documented. Depending on the size and scope of the event, multiple meetings may be held to ensure feedback is received from all pertinent groups for the event. These after event assessments include operational, communication and support organizations so that items are gathered from all groups, especially when items may involve multiple organizations. The purpose of the assessment is to discuss activities and to identify areas for possible improvement as well as best practices. The *After-Action Report* shall be used by the Companies based upon the results of the debrief, corrective measures may be implemented, and policies or procedures may be revised to improve performance during future events.

Within thirty days following completion of service restoration for any event lasting longer than 72 hours, the Companies' shall submit to the Public Service Commission (PSC) the necessary raw data to allow Staff to compile the *Utility Emergency Performance Metrics* report (i.e., The Scorecard) in compliance with *PSC Case 13-E-0140.*

Within sixty days following completion of service restoration, the Companies evaluate the 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' Emergency Preparedness Department with the Area and Incident Command leads will determine the effectiveness of procedures and gauge the need for revisions to the Plan, *Division Emergency*

Restoration Plans, *Incident Command System Position Guide*, or training needs, 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 a review of the Companies' performance, in compliance with *16 NYCRR §105.4(c)* (see Appendix B: *New York Regulations*).