

2018 Winter and Spring Storms Recommendations Implementation Plan

Orange and Rockland Utilities, Inc.
Case 19-E-0108

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I EXECUTIVE SUMMARY

On March 3, and March 7, 2018, two consecutive nor'easters (*i.e.*, Winter Storms Riley and Quinn, collectively referred to as the "March Winter Storms") significantly impacted Westchester, Rockland, Orange, Putnam, and Sullivan counties. These two storms resulted in approximately 84,000 customer outages in Orange and Rockland Utilities, Inc.'s ("O&R" or the "Company") New York service territory, making it the Company's third largest restoration effort, behind Superstorm Sandy and the October 2011 snow storm.

Soon after the March Winter Storms, O&R established a Storm Assessment Team to conduct an after-action review to evaluate preparation and restoration performance, and identify strengths, as well as areas for improvement. The Company then evaluated areas for improvement and determined the best way to address the issues identified. As a result, the Company proactively made enhancements to a number of processes and applications. Improvements include:

- **Smart Meter Technology**
 - Installation of more than 136,000 smart meters throughout O&R's service territory, with completion scheduled for 2020.
 - Those smart meters will be able to communicate with the Outage Management System ("OMS") by June 2019.
 - That ability will improve O&R's response to storm restoration efforts in the future by facilitating faster acknowledgement of power outages, allowing determination of nested outage conditions earlier in the restoration process, enabling more strategic restoration for single service outages (using ability to ping each single service outage prior to dispatch), supporting more impactful use of field forces during restoration (crews dispatched to confirm power outages), and aiding confirmation of power restoration once field work is complete.
- **Storm Hardening and Resiliency Investments**
 - Since Superstorm Sandy, O&R has made incremental investments in its electrical delivery system, spending \$45.3 million on targeted hardening and resiliency projects.
 - Updated electric distribution design standards to reflect O&R's commitment to reducing outage impact.
 - Targeting higher exposure areas to implement hardened system construction, selective undergrounding, and smart grid solutions to reduce outage exposure.
- **Addressing Hazardous Trees**
 - Improving communications about tree trimming and awareness of hazardous trees (*i.e.*, dead or dying trees) on private property in proximity to our facilities. Removal of these hazardous trees will minimize customer outages.
 - In a pilot program, O&R has identified hazardous trees on private property in Wallkill and is working with certified arborists, the municipality, and property owners to allow O&R to remove these trees, as necessary. To date, 925 trees have been removed.
- **Strengthening Community Response Team ("CRT")**
 - The CRT will be provided with a work plan twice daily that includes the crew locations and restoration activities planned for the 12-hour operational period.
 - The CRT will conduct tabletop exercises with county and municipal Offices of Emergency Management that will include CRTs not normally assigned to that location to enhance cross-training and to build relationships.

- O&R's Outage Map will be upgraded in the fall of 2019, and once available, training will be offered to our municipal partners on the new features.
 - To address locations that are hit hard, but are not a "predesignated CRT location," a criteria has been developed and will be used to evaluate the impact and need for a CRT in those areas.
 - To enhance the CRT's effectiveness, the CRT Share Point portal used by all CRT personnel during a storm will be streamlined to improve the CRT user experience, and ability to quickly access key municipal information.
- **Improved Estimated Time of Restoration ("ETR") Process**
 - Developed a new ETR strategy to provide more timely and accurate restoration times for storm-affected customers.
 - Working to establish and communicate two restoration timeframes: one for vast majority of customers and another for the remaining customers.
- **Enhanced Customer Communications**
 - Increasing enrollment in texting for outage and restoration communications through ongoing advertising and promotion through press releases and social media.
 - Establishing a formal process for obtaining key information such as ETRs, the day's work sites, and number of customers expected to be restored in specific locations for employees to better answer questions from customers, municipal leaders and the media.
 - Produced site safety signs to better identify employees in the communities, and restoration guide brochure for field employees to have available for customers post-storm.
- **Improving Logistics**
 - Updating all staging area maps with details and added a new site in Woodbury Commons.
 - Identified and established additional strategic areas for on-site materials storage that can be used during an event.
 - Established list of employees and contractors needed to operate these staging areas, and strategic material storage areas.
 - Developed complete lists of materials needed for storms and pre-loaded crates in advance of a storm event.

O&R submitted an Emergency Response Scorecard, and its Report on Preparation and System Restoration Performance ("Part 105 Report") for the Riley/Quinn winter storms. The New York State Department of Public Service ("DPS") issued an investigation report on April 18, 2019, titled "2018 Winter and Spring Storms Investigation; Case 19-M-0285 – In the Matter of Utility Preparation and Response to Power Outages During the March 2018 Winter and Spring Storms" ("Investigation Report"). The 170-page Investigation Report included 94 recommendations for improving storm preparation and restoration performance. Of the 94 recommendations, 67 were applicable to O&R.

On April 18, 2019, the NYS Public Service Commission ("Commission") issued an order directing all Utilities Companies¹ to show cause why they should not implement and incorporate the Investigation Report's recommendations into their Emergency Response Plan ("ERP").

As described in more detail below and in the Appendices, the Company has also developed a robust process

¹ Consolidated Edison Company of New York, Inc. ("Con Edison"), O&R, Central Hudson Gas & Electric Corporation ("Central Hudson"), New York State Electric & Gas Corporation ("NYSEG"), Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid"), Rochester Gas and Electric Corporation ("RGE"), and PSEG Long Island ("PSEG-LI"), (collectively the "Utility Companies")

to respond to the Investigation Report’s recommendations, is implementing most of them and has already completed many of them. The Company also proposes herein minor modifications to a small number of the Investigation Report’s recommendations. Through its prior actions and its response herein, the Company is demonstrating its commitment to improving and enhancing its storm response and restoration process.

A. Overall Process

Over the course of two weeks, various subject matter experts and members of the Company’s Emergency Preparedness group reviewed and addressed all 67 recommendations. Implementation plans for all 67 recommendations are included in this report.

B. Recommendations

The 67 recommendations contained in the Investigation Report applicable to O&R are distributed across the three Focus Areas and 17 Action Topics set forth in the table below.

Focus Area	Action Topic	# of Items
Operations	Road Clearing and Downed Wires	6
	Resource Acquisition and Mutual Assistance	2
	Damage Assessment	2
	Outage Management Systems	4
	Estimated Time of Restorations (ETR)	5
	Restoration Process	10
	Restoration of Critical Facilities	5
Communications	Mass Communications	8
	Municipal Liaisons	3
	Municipal Calls	6
	Utility Websites	2
	Call Center Operations	3
	Life Support Equipment (LSE) Customers	5
	Dry Ice Distribution	2
	Customer Reimbursements	1
System Improvements	Hardening the Electric System	1
	Tree Management	2
Total		67

C. Organization Structure and Process for Implementation

The Company established a project management approach as described within this Implementation Plan to evaluate and address each of the 67 recommendations. To facilitate this process, the Company assigned each recommendation to subject matter experts, with at least one executive sponsor assigned to oversee

each recommendation’s implementation plan development and execution.

O&R addressed the 67 recommendations in an integrated and comprehensive manner, so as to achieve operating efficiency and consistency for the benefit of customers. O&R’s Vice President of Operations has overall responsibility for implementing this Implementation Plan.

D. Goals of Implementation

O&R’s implementation of the recommendations is an effort that includes active participation and engagement from employees at all levels of the Company, with the full support and leadership of the Company’s executive management. Consistent with the Company’s commitment to customer focus, operational excellence, safety and continuous improvement in its business processes, the Implementation Plans will result in improvements that will provide more effective and efficient processes within the Company’s operations, continue to build on the Company’s culture of inspiring customer-centric thinking and engagement, identify and apply best practices, and promote the delivery of reliable, safe and quality services to our customers at a reasonable cost. By leveraging this sharing of information, the Company can maximize efficiency and consistency in the way we do business and provide service to our customers.

The Company acknowledges that all 67 recommendations require thorough review, analysis, and consideration, in order to identify and implement the best solutions.

II IMPLEMENTATION PLAN

The Company recognizes that it needs to routinely re-examine its planning and operating processes to achieve improvements to outage restoration performance and efficiency and to achieve long-term success.

The table in Appendix A provides the numbering sequence, chapter reference, recommendation, and status regarding the implementation of each recommendation.

A. Status of Recommendations

Each of the Company’s subject matter experts has individually examined the Investigation Report’s statements of relevant findings, conclusions, and the associated recommendation(s). Appendix A to this Implementation Plan reflects the status regarding the implementation of each recommendation. Each was assessed under one of the following two status categories:

- Accept: Investigation Report’s identification of relevant finding(s), conclusion(s), and recommendation(s) has been reviewed and will be incorporated into the Company’s policies, procedures, or operations, to meet the recommendation as written.
- Modify: Investigation Report’s identification of relevant finding(s), conclusion(s), and recommendation(s) has been reviewed, but the Company considers modification(s) to be warranted.

Many recommendations are deemed “complete” and require no further action by the Company, or regular

actions (e.g., ongoing training or document review), as stated in the implementation plans. All others have been given a projected timeframe for completion in one of the following three categories:

- Short: within one month
- Medium: within six months
- Long: greater than six months

Appendix B provides each recommendation's individual implementation plan. It provides information, including but not limited to, recommendation description, timeframe for completion, status, work plan, inclusive of deliverables and milestones with associated dates, and a summary of customer-benefit and risk analysis, where applicable.

B. Customer Benefit and Risk Analysis

The Company is committed to a customer-centric focus and keeping customer value at the forefront of its business decisions. As such, a guiding principal throughout all qualitative and/or quantitative analyses is customer cost, benefit, and risk. The Company will evaluate the costs, benefits and risks of implementation actions where appropriate, in order to determine whether implementation would be beneficial. These calculations are expected to be preliminary in the initial stages of the evaluation and developed further as efforts progress and more information becomes available. In addition, for some recommendations, a tangible cost benefit analysis will not be feasible. In such cases, the Company will require that qualitative measures indicate adequate customer benefits to warrant implementation.

Each recommendation will be evaluated by the Company in the context of cost, customer value and feasibility. In cases where the Company's evaluation supports the implementation of a recommendation, the Company will act to implement the recommendation. Similarly, should evaluation of a recommendation show that the identified benefits will not materialize to an extent appropriate to justify actions, the Company will suggest an alternative in accordance with the guidance provided by the Commission.² If analysis shows that further action to address an ongoing initiative will not be beneficial, the Company will change course accordingly to avoid negative impacts. These evaluations will be reflected in the Company's Implementation Plan updates to the Commission.

III CONCLUSION

The Company recognizes that the findings, observations, and recommendations of this Investigation Report represent an opportunity for effecting improvements for the benefit of customers. The Company and its executive leadership are committed to collaborating with the Commission, NYS DPS and other stakeholders on implementation activities. The Company has, and, as appropriate, will continue to assess each of the recommendations carefully and looks forward to implementing those recommendations that will result in short-term and long-term benefits to our customers.

² Case 19-E-0108, *Proceeding on Motion of the Commission Investigating Utility Preparation and Response to Power Outages During the 2018 Winter and Spring Storms for Orange and Rockland Utilities, Inc.*, Order Instituting Proceeding and to Show Cause (issued April 18, 2019), see, Ordering Clause 4.

IV APPENDICES

Appendix A: Table of Recommendations and Status

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
1	All electric utilities create a new code for their OMS that indicates a road(s) closure with no ingress or egress.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	In Progress	Medium
2	All electric utilities and telecommunication providers establish a joint written plan of procedures and protocols with counties to establish a Road Clearing Task Force. The written plan should include a contact list and be exercised annually through tabletop drills or other mechanisms.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	In Progress	Medium
3	All electric utilities assign at least one Utility Field Coordinator to the Road Clearing Task Force.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	Complete	N/A
4	All electric utilities establish a Road Clearing crewing level matrix based on the severity of a storm. The matrix shall be shared with DPS Staff, the counties and be included in ERPs.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	Complete	N/A
5	All electric make-safe crews and tree crews assigned to the Road Clearing Task Force are required to have sufficient tools, to test and remove downed cables and tree debris.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	Complete	N/A
6	All electric utilities should make every effort to use make-safe contractor crews for the Road Clearing Task Force.	4.1 Road Clearance & Downed Wires 4.1.1 Road Clearing Efforts	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
11	The electric utilities request NAMAG calls be held during the evening or early morning to allow for better planning and faster arrival of resources.	4.2 Resource Acquisition and Mutual Assistance	Modify	Complete	N/A
12	The electric utilities file a joint report with the Department within 90 days addressing proposals to improve the NAMAG process and securing external contractors considering, but not limited to: holding FTEs for sister utilities; allocating contractors through NAMAG or a separate organized process; requesting resources as a State versus individual utilities; better transparency into crew availability and allocation process; and improving communications with the host utility while traveling.	4.2 Resource Acquisition and Mutual Assistance	Accept	In Progress	Medium
17	All electric utilities improve the procedures to prioritize and dispatch wire guards to timely relieve damage assessors guarding downed wires to minimize the adverse impacts on the damage assessment activity.	4.3 Damage Assessment	Accept	Complete	N/A
18	All electric utilities develop a minimum staffing matrix and have adequate numbers of trained damage assessors available in each division/region that are ready to be dispatched if needed. The ERPs will reflect these improvements.	4.3 Damage Assessment	Accept	Complete	N/A
19	All electric utilities develop appropriate error messages that will inform customers when there is an issue due to its OMS or other IT applications and direct them to alternate ways to report an outage or obtain additional information. The ERPs will incorporate this change.	4.4 Outage Management Systems	Accept	In Progress	Medium

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
20	All electric utilities establish a mechanism—which will include additional monitoring resources and, if feasible, automatic error flagging—to alert operators of lockups or other anomalies and validate data between various systems during a storm event.	4.4 Outage Management Systems	Accept	In Progress	Medium
21	All electric utilities run diagnostic testing and stress tests of their OMS and create backup procedures to check that OMS is accurately providing updated information. The stress tests shall incorporate the maximum allowed users and account for the increased data flow between OMS and smart meters, SCADA system, and all other applications and databases simultaneously.	4.4 Outage Management Systems	Accept	In Progress	Long
22	All electric utilities modify their ERPs to require, on a semi-annual basis, a stress test be performed, the OMS logic rules are reviewed, and training requirements for OMS users occurred.	4.4 Outage Management Systems	Modify	In Progress	Medium
23	All electric utilities develop procedures to have prominent language displayed on its outage map website that explains to customers what is meant by a global, regional, local, and job-specific ETR.	4.5 Estimated Time of Restoration	Modify	In Progress	Medium
24	The electric utilities update ERPs to provide regional ETR information on a county basis and provide local ETR information on a town/municipality basis.	4.5 Estimated Time of Restoration	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
25	For outages expected to last longer than 48 hours, all electric utilities will provide regional and local ETRs applicable to 95 percent or more of the affected customers and eliminate references to communicate the global ETR once all regional ETRs have been issued. The ERPs will reflect this modification.	4.5.1 Customers represented within an ETR	Accept	Complete	N/A
26	All electric utilities develop a post restoration review process to assess the accuracy of ETRs provided and implement corrective measures that may result from the review.	4.5.2 Accuracy of Estimated Restoration Times	Accept	Complete	N/A
28	The electric utilities update their ERPs and procedures to denote the implementation of a daily predetermined timeframes for when ETRs will be reviewed and updated.	4.5.2 Accuracy of Estimated Restoration Times	Accept	Complete	N/A
31	During emergency restoration all field crews report directly to their assigned work location after receiving their job briefings and assignments.	4.6.1 Processing and Deployment Activities	Accept	Complete	N/A
32	To minimize delays in getting work packages to crews, all electric utilities use field support resources to deliver work packages to external crew foremen at their hotels in the early morning and crew guides provide job briefings to mutual assistance and contractor crews at the work locations.	4.6.2 Resource Management	Accept	Complete	N/A
34	All electric utilities identify the feasibility to contract with third parties that can perform crew guide functions and modify their ERPs on how to access these resources.	4.6.2 Resource Management	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
36	All electric utilities have readily available crewing information for all circuits being worked each day.	4.6.3 Utilization of Resources	Accept	Complete	N/A
37	All electric utilities identify what work is occurring on a town/municipality basis to enable municipal liaisons to have better visibility on the restoration progress, which will improve communication and coordination with local officials and other stakeholders.	4.6.3 Utilization of Resources	Accept	Complete	N/A
38	All electric utilities develop best practices to ensure that tree crews are better aligned with line crews to minimize delays in clearing hazards prior to restoration activities.	4.6.4 Coordination of Tree Crews	Accept	Complete	N/A
39	The electric utilities and telecommunications providers develop templates and other aids to ensure appropriate detailed information is shared during a storm event, including the contact information for individuals activated during the event.	4.6.5 Coordination with Telecommunications Providers	Accept	In Progress	Medium
40	The electric utilities modify their ERPs to clarify when representatives from telecommunications providers should be co-located in their EOCs and the process for communicating such a request as well as the reporting location(s) and the names and contact information of the assigned electric utility representative(s) located within the EOCs. Telecommunications providers also need to develop or modify their procedures to identify personnel to be co-located and ensure such action is taken.	4.6.5 Coordination with Telecommunications Providers	Accept	In Progress	Medium

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
41	The electric utilities and telecommunications providers develop a process to practice the communications and pole installation process as part of drills or other exercises and perform after actions and lessons learned reviews to identify process improvements.	4.6.5 Coordination with Telecommunications Providers	Accept	In Progress	Medium
42	All electric utilities, except PSEG LI as it does not have borderline customers, ensure borderline customers are easily distinguished in OMS and review their procedures related to communicating outages to and obtaining ETRs from neighboring utilities. Modifications to the ERPs shall be made accordingly.	4.6.6 Restoring Borderline Customers	Accept	Complete	N/A
43	All electric utilities meet with county officials semi-annually, at a minimum, to review critical facilities lists and circuit maps to verify their completeness and accuracy. All modifications (additions, deletions) shall be captured and incorporated into revised lists, which will be provided to the county. The ERPs shall incorporate this requirement.	4.7 Restoration of Critical Facilities	Accept	In Progress	Medium
44	Each electric utility coordinate with county officials to identify residential developments with large elderly populations or other similarly vulnerable establishments and code them as priority level 3 critical facilities.	4.7 Restoration of Critical Facilities	Accept	In Progress	Medium

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
45	All electric utilities coordinate with county officials to prioritize the restoration sequence of critical facilities during a major storm event. Communications with counties should be on a structured time schedule to allow these jobs to be included in work packages for the next day. Additionally, this prioritization should be part of future exercise and incorporated into the ERPs.	4.7 Restoration of Critical Facilities	Accept	Complete	N/A
46	For outages that are escalated by a county, either through the liaisons or the other contact, utilities must be prepared to provide direct communications between decision-makers and counties to enable coordinated response efforts.	4.7 Restoration of Critical Facilities	Accept	Complete	N/A
47	All electric utilities investigate historical outage information and circuit maps to identify potential investments that will increase reliability to critical facilities that counties consider essential.	4.7 Restoration of Critical Facilities	Accept	In Progress	Long
48	All electric utilities develop and document within their ERPs pre-determined time periods for press release issuance and dissemination that coincides with local news cycles.	5.1.1 Press Releases	Accept	Complete	N/A
49	All electric utilities develop a process that permits press releases and related information updates outside of normal media cycles, only as events warrant; for example, a change in the global ETR. This shall be incorporated into their ERPs.	5.1.1 Press Releases	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
50	All electric utilities, and NYSEG/RGE in particular, delineate and clearly state which part(s) of its service territory, including counties affected, is being addressed in all press releases and on social media, especially for utilities with a large or multi-state presence, such as Avangrid (parent company of NYSEG and RGE), National Grid and Orange & Rockland. The ERPs will incorporate this modification.	5.1.1 Press Releases	Accept	Complete	N/A
51	For regional press releases issued by all electric utilities, particularly NYSEG, clearly state the regions and counties covered by each press release.	5.1.1 Press Releases	Accept	Complete	N/A
54	Orange & Rockland cease from issuing excessive numbers of press releases with stale or information that was included in a previous/recent release, or issue press releases with only safety tips.	5.1.1 Press Releases	Accept	Complete	N/A
55	Orange & Rockland issue New York-specific press releases or, in the alternative, clearly state what information in each press release applies to New York or New Jersey. Orange & Rockland's ERP will incorporate this modification.	5.1.1 Press Releases	Accept	Complete	N/A
56	As a best practice, all electric utilities develop a process that captures customer feedback and frequent questions through social media and the call center so the PIO can incorporate this information in subsequent press releases during an event. The ERPs will incorporate this modification.	5.1.1 Press Releases	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
57	Con Edison and Orange & Rockland's blast emails contain narrative text with event-related and utility contact information in the body of the email as well as an embedded link referring to the utilities' storm page on its website. Con Edison and Orange & Rockland's (ERP?) will incorporate this modification.	5.1.3 Email and Text Alerts	Accept	Complete	N/A
59	All electric utilities provide their respective municipal liaisons with information necessary to support effective communication between the utility and the counties.	5.2.2 Effectiveness of Liaisons	Accept	In Progress	Long
60	To ensure liaisons are aware of the area they are representing, all electric utilities establish a packet of local information including circuit maps, contact information for EOCs and municipal officials, and lists of critical facilities and LSE customers that can be provided to liaisons. The ERPs will incorporate this modification.	5.2.2 Effectiveness of Liaisons	Accept	In Progress	Long
61	The electric utilities' exercises involving liaisons should endeavor to include liaisons who are not typically located in that region. The ERPs will incorporate this modification.	5.2.2 Effectiveness of Liaisons	Accept	In Progress	Medium
63	All electric utilities improve communication with municipalities by encouraging municipal officials to report specific issues to their county EOCs, leaving the municipal calls to serve as brief updates for the affected area(s) as a whole and leaving individual issues to be addressed using other communication avenues, including, but not limited to, municipal liaisons.	5.3 Municipal Calls	Modify	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
64	During municipal calls, all electric utilities discuss, at a high-level, the hardest- hit areas, what has been accomplished since the last call, and the workplan for the following day. The ERPs will incorporate this modification.	5.3 Municipal Calls	Modify	Complete	N/A
65	All electric utilities include in the call invitation a detailed agenda covering what will be discussed in each call, any information regarding the correct venues or channels to report municipal-specific issues, and ways to access updates through outage maps or liaisons. The ERPs will incorporate this modification.	5.3 Municipal Calls	Accept	Complete	N/A
66	All electric utilities exclusively use operator-assisted systems with line-muting capability for the municipal calls to minimize disruptions and to streamline the calls, specifically for the roll call and question-and-answer session. The ERPs will incorporate this modification.	5.3 Municipal Calls	Accept	Complete	N/A
68	The electric utilities semi-annually update municipal and elected official contact lists on prescribed dates and provide a document to officials detailing the methods to contact the utility if any information changes in the interim. The ERPs will incorporate this modification.	5.3 Municipal Calls	Accept	Complete	N/A
69	All electric utilities survey the municipal leaders and elected officials to determine if the Municipal Calls are useful, if there is a better method to distribute information, and what information is required. The ERPs will incorporate all agreed upon changes.	5.3 Municipal Calls	Accept	In Progress	Medium

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
70	All utilities establish a website banner noting any known deficiencies or issues related to ETRs and when updated information can be expected. The ERPs will incorporate this modification.	5.4 Utility Websites	Accept	Complete	N/A
72	All storm-related website pages include a timestamp indicating when the information was posted and updated. If no new information is available over an eight hour period, the electric utilities need to revise the timestamps on applicable pages to clearly show the public that the information is accurate. The ERPs will incorporate this modification.	5.4 Utility Websites	Accept	Complete	N/A
73	All utilities update their methods of tracking call center staffing during events to reflect the actual number of incoming telephone lines being serviced on a 30-minute interval basis.	5.5.1 Call Answer Performance	Accept	In Progress	Medium
74	All utilities identify a person or group to monitor and resolve any instances of high abandon rates or reports of busy signals on its incoming call center telephone lines. The ERPs will incorporate this modification and future reports need to reflect abandon rates and busy signals.	5.5.1 Call Answer Performance	Modify	Complete	N/A
76	All utilities develop proactive measures to ensure that concise, comprehensive, and accurate information is being provided in all IVR messaging. The ERPs will incorporate this modification.	5.5.2 Interactive Voice Response	Accept	Complete	N/A

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
78	All utilities ensure procedures direct CSRs who speak with an LSE customer to update the customer's contact information, after addressing their concern.	5.6 Life Support Equipment Customers	Accept	Complete	N/A
79	All utilities should strive to have a minimum of two alternate emergency contact telephone numbers for each LSE customer account.	5.6 Life Support Equipment Customers	Accept	Complete	N/A
80	All utilities certify that the LSE customer lists and information have been updated and verified at least twice a year.	5.6 Life Support Equipment Customers	Accept	Complete	N/A
81	All electric utilities provide improved procedures in their ERPs, designed to eliminate the critical failures in their OMS system, as well as LSE customer notifications and site visits going forward.	5.6.2 Contact Requirements for Affected LSE Customers	Accept	Complete	N/A
84	NYSEG, Central Hudson, Orange & Rockland, and PSEG LI develop detailed procedures to accurately track and log LSE customer contacts.	5.6.4 Dedicated LSE Customer Call Numbers and Procedures	Accept	Complete	N/A
85	All electric utilities begin distributing dry ice within 24 hours of the start of restoration when outages are anticipated to last more than 48 hours. The ERPs will incorporate this modification.	5.7 Dry Ice Distribution	Accept	Complete	N/A
86	All electric utilities consult with county EOCs to develop geographically appropriate locations for dry ice distribution. This includes establishing a list of potential distribution locations before an event. The ERPs will incorporate this modification.	5.7 Dry Ice Distribution	Accept	In Progress	Medium

Rec #	Recommendation Details	PSC Report Section	Response	Status	Timeframe
87	All electric utilities develop and implement a transparent process that includes acknowledgment of a claim and sets a reasonable timeframe for reimbursement disposition.	5.8 Customer Reimbursements	Accept	In Progress	Medium
88	All electric utilities submit an actionable plan by July 1, 2019, which details future storm hardening measures including a budget, timeline, and major performance benchmarks.	6.1 Hardening the Electric System	Accept	In Progress	Long
93	All electric utilities submit a report to Staff, detailing all efforts that have been made with the towns and/or municipalities to improve public education regarding danger tree removal on private property.	6.3.3 Future Coordination	Accept	In Progress	Medium
94	All electric utilities immediately begin sharing the list of customers that refuse removal of danger trees with the appropriate municipal officials. These lists should be shared at least on a semi-annual basis.	6.3.3 Future Coordination	Accept	In Progress	Short

Appendix B: Individual Implementation Plans

Recommendation Number: 1

Recommendation: All electric utilities create a new code for their OMS that indicates a road(s) closure with no ingress or egress.

Timeframe for Completion: Medium

Company Response: Accept

Status of Recommendation: In Progress

ORU will design a new code within the OMS and associated applications for ingress/egress issues indicated by Municipalities, Emergency Personnel, etc.

Electric ERP revision? No

Work Plan:

- Design new code within the OMS and associated applications.
- Update all upstream systems (CSR Desktop, Muni Portal, etc. to be able to input code)
- Update all downstream systems (Outage Map, Road-closures Dashboard, CRMS Dashboards) to display and consume new code
- Test all systems end-to-end
- User training for process changes around the use of new code – electric operations, emergency preparedness and customer operations

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Design New code	5/1/19	5/31/19
Current State Analysis		
Update all systems (lower environments)	5/31/19	7/31/19
User Training	6/30/19	7/31/19
End to End Testing	7/31/19	8/31/19
Design & Implementation		
Deployment	8/31/19	9/30/19

Summary of Costs:

There are minimal incremental costs associated with implementing this recommendation. There is a minimal amount of development to update all systems, as well as end user training.

Recommendation Number: 2

Recommendation: All electric utilities and telecommunication providers establish a joint written plan of procedures and protocols with counties to establish a Road Clearing Task Force. The written plan should include a contact list and be exercised annually through tabletop drills or other mechanisms.

Timeframe for Completion: Medium (< 6 months)

Company Response: Accept

Status of Recommendation: In Progress

Meetings with telecommunication companies are in the process of being established.

Electric ERP revision? TBD, will determine whether to include language in the next annual filing

Work Plan:

- The Company is scheduling meetings with the telecommunication companies.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Meetings with telecommunication companies	May 1, 2019	June 30, 2019
Current State Analysis		
Design & Implementation		
Update plan and procedure		July 31, 2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 3

Recommendation: All electric utilities assign at least one Utility Field Coordinator to the Road Clearing Task Force.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Priority Response Group (PRG) facilitates the coordination and communication with municipalities regarding electric hazards or utility equipment impeding road clearing, down wires, critical facilities. The Company currently utilizes the PRG as the Road Clearing Task Force. ERP Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide, currently includes field coordinators.

Key Protocols / Procedures:

- ERP Attachment 13, Priority Response Group (PRG) Response and Recovery Guide

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 4

Recommendation: All electric utilities establish a Road Clearing crewing level matrix based on the severity of a storm. The matrix shall be shared with DPS Staff, the counties and be included in ERPs.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

In accordance with December 15, 2018 ERP, Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide, the Company currently utilizes the PRG as the Road Clearing Task Force.

The PRG facilitates the coordination and communication with municipalities regarding electric hazards or utility equipment impeding road clearing, down wires, critical facilities. PRG staffing encompasses Damage Assessors, Line Crews, Tree Crews and administrators to conduct direct municipal and county liaison efforts with field support crews.

Per the ERP, the PRG function will mobilize in accordance with the Storm Classification and Staffing Matrix.

Key Protocols / Procedures:

- ERP Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 5

Recommendation: All electric make-safe crews and tree crews assigned to the Road Clearing Task Force are required to have sufficient tools, to test and remove downed cables and tree debris.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

All electric make-safe crews assigned to the PRG are required to have sufficient tools, to test and remove downed cables. All tree crews assigned to the PRG are required to have sufficient tools, to remove dangerous tree conditions involving electric facilities. *Please note: Tree crews are not authorized to test or remove wires.

Key Protocols / Procedures:

- ERP Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 6

Recommendation: All electric utilities should make every effort to use make-safe contractor crews for the Road Clearing Task Force.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Key Protocols / Procedures:

- Emergency Response Plan ('ERP'), Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide

In accordance with the December 15, 2018 ERP, Attachment 13 – Priority Response Group (PRG) Response and Recovery Guide, the Company currently utilizes the PRG as the Road Clearing Task Force. Staffing matrices applicable to PRG currently within ERP.

Company protocols employ Company make-safe crews upon initial mobilization and will supplement with make-safe contract crews for PRG road clearing efforts as needed to comply with matrix level staffing.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will incur no incremental costs in implementing this recommendation.

Recommendation Number: 11

Recommendation: The electric utilities request NAMAG calls be held during the evening or early morning to allow for better planning and faster arrival of resources.

Timeframe for Completion: N/A

Company Response: Modify

Status of Recommendation: Complete

NAMAG calls are held based on a number of factors which includes the timing of the event, the location of the requesting company in the storm track, as well as timing for release of crews. Where it is feasible, NAMAG calls will be held during the early morning or evening.

Electric ERP Revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 12

Recommendation: The electric utilities file a joint report with the Department within 90 days addressing proposals to improve the NAMAG process and securing external contractors considering, but not limited to: holding FTEs for sister utilities; allocating contractors through NAMAG or a separate organized process; requesting resources as a State versus individual utilities; better transparency into crew availability and allocation process; and improving communications with the host utility while traveling.

Timeframe for Completion: Medium

Company Response: Accept

Status of Recommendation: In Progress

The Company and the other NYS utilities will address this recommendation and file the joint report within the 90-day period.

Electric ERP Revision? No

Work Plan: N/A

Deliverables/Milestones: The Company and the other NYS utilities will file the requested joint report within the 90-day period.

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 17

Recommendation: All electric utilities improve the procedures to prioritize and dispatch wire guards to timely relieve damage assessors guarding downed wires to minimize the adverse impacts on the damage assessment activity.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company has updated Emergency Response Plan (ERP) Plan Attachment 6 - Downed Wires Guideline, to reflect "Relief of Company (O&R) Damage Assessment crews" to the Priority 3 table. The Company also updated ERP Attachment 5 - Site Safety Response and Recovery Guide.

Electric ERP revision? Yes

- Attachment 5 - Site Safety Response and Recovery Guide
- Attachment 6 – Downed Wires Guideline

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 18

Recommendation: All electric utilities develop a minimum staffing matrix and have adequate numbers of trained damage assessors available in each division/region that are ready to be dispatched if needed.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Emergency Response Plan (ERP) Attachment 12 – Storm Classification and Staffing Matrix reflects the Company’s minimum staffing for Damage Assessors.

The Company will update Section 4.3 – Damage Assessment and Wire Guarding in the May 20, 2019 ERP to reflect: “The Company will maintain an adequately trained workforce to meet damage assessor staffing requirements as per the ERP. Annually, the Company will train 30 internal Damage Assessors.”

Electric ERP revision? Yes

- Section 4.3 – Damage Assessment and Wire Guarding

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 19

Recommendation: All electric utilities develop appropriate error messages that will inform customers when there is an issue due to its OMS or other IT applications and direct them to alternate ways to report an outage or obtain additional information. The ERPs will incorporate this change.

Timeframe for Completion: Medium (< 6 months)

Company Response: Accept

Status of Recommendation: In Progress

In the event of OMS or other Information Technology applications being affected, customers will be notified via The Company’s corporate web site as to the nature of the impact. If ORU's corporate web site should become unavailable, the customer shall be redirected to a new informational webpage that will list alternate ways to report an outage or obtain additional information regarding their outage. In addition, the Company has developed a backup web page to display outage counts if the outage map is affected. The Company will enhance this backup web page to include additional information on reporting outages.

Electric ERP revision? Will be added to the ERP in the next annual filing.

Work Plan:

- Enhance the backup web pages to include additional information on reporting outages.
- Test and deploy new web pages.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Design new backup web pages	5/1/19	6/30/19
Current State Analysis		
End to End Testing	7/1/19	8/31/19
Design & Implementation		
Deployment (in conjunction with planned release cycle)	9/1/19	9/30/19

Summary of Costs:

There are minimal incremental costs associated with implementing this recommendation. There is a minimal amount of development to update all systems, as well as end user training.

Recommendation Number: 20

Recommendation: All electric utilities establish a mechanism—which will include additional monitoring resources and, if feasible, automatic error flagging—to alert operators of lockups or other anomalies and validate data between various systems during a storm event.

Timeframe for Completion: Medium (< 6 months)

Company Response: Accept

Status of Recommendation: In Progress

The Company in response to winter storms Riley and Quinn has corrected systems and reporting architectures so that all reports are using the same original data set. In addition, the Company has expanded and deployed additional monitoring systems. These include heartbeat alerts from key OMS processes, data frequency alerts to customer facing systems and internal dashboards, and data divergence alerts based on percentage of values on internal versus external dashboards displaying outage counts.

In addition, ORU has a Quality Control Team that monitors the Customer Facing tools so that they are working and in synchronization. There are remediation processes in place for when discrepancies are discovered. While this process worked correctly during the winter storms, ORU is pursuing the deployment of a dashboard that monitors internal and external outage counts and other key metrics so that all systems are displaying the same information in an effort to replace the manual process.

Electric ERP revision? No

Work Plan: There is a minimal amount of development to update all systems, as well as end user training.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Design Dashboard	5/1/19	5/31/19
Current State Analysis		
Develop Interfaces/API	5/31/19	6/31/19
User Training	6/30/19	7/31/19
End to End Testing	7/1/19	7/31/19
Design & Implementation		
Deployment	8/1/19	8/30/19

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 21

Recommendation: All electric utilities run diagnostic testing and stress tests of their OMS and create backup procedures to check that OMS is accurately providing updated information. The stress tests shall incorporate the maximum allowed users and account for the increased data flow between OMS and smart meters, SCADA system, and all other applications and databases simultaneously.

Timeframe for Completion: Long-term

Company Response: Accept

Status of Recommendation: In Progress

Under the OMS hardening project, the Company initiated end-to-end testing for all OMS applications. Under this program, the Company is developing a new end-to-end test environment that will run in parallel to production systems to enable end-to-end stress testing. This is a multiyear project where the Company has partnered with a testing vendor to increase the maturity of the testing practices through automating test cases and utilizing new testing tools. The Company will modify the stress testing process to include enhanced testing to simulate concurrent maximum usage for users and data.

Electric ERP revision? No

Work Plan:

As part of this enhanced testing, the Company will develop new test environments, deploy new software testing tools, and implement new back-up procedures so that OMS applications operate accurately during major storms.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Draft Test Plan	3/25/19	7/31/19
Current State Analysis		
Implement parallel test environment for NMS system	11/30/18	4/30/19
AMI Integration Stress Testing	6/1/19	12/31/19
Downstream OMS Systems Stress Testing	1/1/20	12/31/20
Design & Implementation		
E2E Testing Phase 1	6/1/19	12/31/19
E2E Testing Phase 2	1/1/20	12/31/20

E2E Testing Phase 3	1/1/21	12/31/21
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Summary of Costs:

To implement this recommendation, the Company needs a separate environment where simulations of storms can be simulated. This will require additional hardware and software licenses and labor to develop and maintain such environment. There is an associated line item in the OMS Enhancements Capital Project to account for this work, however there may be additional costs based on this recommendation.

Recommendation Number: 22

Recommendation: All electric utilities modify their ERPs to require, on a semi-annual basis, a stress test be performed, the OMS logic rules are reviewed, and training requirements for OMS users occurred.

Timeframe for Completion: Medium

Company Response: Modify

Status of Recommendation: In-Progress

The Company is enhancing the stress testing processes to include comprehensive end-to-end system testing. As part of the enhanced testing processes, the Company will conduct stress tests of core systems at minimum annually and plan for additional stress tests in conjunction with major enhancements for OMS.

The Company is undertaking a comprehensive OMS hardening work plan beginning in 2018 through 2022. As part of this work plan, major system enhancements are planned over the next few years that require additional stress tests. This will allow the Company to satisfy this recommendation by conducting at least two stress tests over a 12-month period. The OMS logic rule validation will be added to the stress test scenario.

The Company will refresh the annual e-learning training for OMS users. In addition, all OMS users will receive additional training as part of the deployment of OMS enhancements over a 12-month period.

Electric ERP revision?

- TBD, will determine if edits need to be incorporated into the next annual ERP filing

Work Plan:

- Refresh e-learning module for OMS – 9/30/19
- Initiate tracking of annual stress testing
- Update procedures on major upgrades to include stress testing

Deliverables/Milestones: Stress testing will be tracked annually and as part of major system enhancements

Summary of Costs:

To implement this recommendation, the Company needs a separate environment for stress testing. This will require additional hardware and software licenses and labor to develop and maintain such environment. There is an associated line item in the OMS Enhancements Capital Project to account for this work, however there may be additional costs based on the increased frequency of stress tests under this recommendation.

Recommendation Number: 23

Recommendation: All electric utilities develop procedures to have prominent language displayed on its outage map website that explains to customers what is meant by a global, regional, local, and job-specific ETR.

Timeframe for Completion: Medium

Company Response: Modify

Status of Recommendation: In Progress

While the Company agrees with Staff's recommendation that efforts should be made to reduce customer confusion about ETRs, the Company believes the specific modifications included in this recommendation will not be helpful to customers after it makes upcoming enhancements to the outage map tool, described in greater detail below.

- The outage map display will be changed so that the user sees an ETR based on the geographic area that they are viewing, rather than the global, regional and local ETRs that the Company reports which rely on rigid municipal boundaries. This dynamic scaling of ETRs to correspond to the specific areas being viewed will allow customers to understand the latest time (*i.e.*, the last ETR) that the Company predicts for the area that they choose. As customers zoom to smaller and smaller areas, the ETRs will become more and more specific. The display will include text explaining what the ETR shown means.
- Based on customer research the Company will avoid using the term 'global ETR' when communicating with customers and the public, and instead will refer to an ETR for the "vast majority of customers," which is more reader-friendly. Customers viewing the entire service territory on the outage map will see this language.
- The Company will not provide job-specific ETRs on the outage map moving forward. Instead, a prominent link will be provided for customers to view their personal ETRs along with text encouraging them to report their outage(s).

Taken together these enhancements will make the outage map tool more intuitive and provide a clearer pathway to information on customer-specific ETRs. In light of these changes to the outage map tool Con Edison changed its response to this recommendation from "Accept" to "Modify."

Electric ERP revision? No

Work Plan:

- Develop easily visible links and text leading customers to report their outage and check their specific status
- Develop language explaining ETRs shown on the dynamically scaling map
- Update the map system to show the latest ETRs at every level

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Language Creation	2/1/19	4/1/19
Current State Analysis		
Link review and updates	2/1/19	6/1/19
Design review	3/1/19	6/15/19
Design & Implementation		
Map System upgrade	1/29/19	12/31/19

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 24

Recommendation: The electric utilities update ERPs to provide regional ETR information on a county basis and provide local ETR information on a town/municipality basis.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

This methodology is currently in place with the Company's updated ETR process. Once the work plans are developed and OMS is updated with more specific ETRs, the Regional and Local ETRs will be available on the Company Dashboard (internal), the Company Outage Map (external) and will be available for regulatory reporting.

Electric ERP revision? Yes

- ERP Section 2.4 Estimated Time of Restoration ("ETR"); Paragraph 3

Added content: The Incident Commander will review and approve a Corporate Restoration Target for the event for communication to both internal and external stakeholders. All ETRs will be communicated using the ETR Protocol as defined in Attachment 3. As more detailed and relevant information becomes available the Corporate Restoration Target will be refined for the customers that represent the top 90% of the customers affected (Global ETR). The Global ETR will be updated in the Company's OMS. As restoration work plans are developed in conjunction with SERT personnel, Regional (County), Local (Town/Municipal) and customer specific ETRs are determined for the top 95% of customers affected. These ETRs are then updated in the Company's OMS and are then available on the Company's Internal (OMS) Dashboard (internal) and the Company Outage Map (external). Once all Regional ETRs have been populated, all references to the Global ETR will be eliminated.

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 25

Recommendation: For outages expected to last longer than 48 hours, all electric utilities will provide regional and local ETRs applicable to 95 percent or more of the affected customers and eliminate references to communicate the global ETR once all regional ETRs have been issued. The ERPs will reflect this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

This methodology is currently in place with the Company's updated ETR process. The Global ETR is communicated first. After the work plan is developed and ETRs have been updated in OMS, the Regional and Local ETRs are communicated via the Outage Map. The ERP will be updated to provide clarification.

Electric ERP revision? Yes

- ERP Section 2.4 Estimated Time of Restoration ("ETR"); Paragraph 3:

Added content: The Incident Commander will review and approve a Corporate Restoration Target for the event for communication to both internal and external stakeholders. All ETRs will be communicated using the ETR Protocol as defined in Attachment 3. As more detailed and relevant information becomes available the Corporate Restoration Target will be refined for the customers that represent the top 90% of the customers affected (Global ETR). The Global ETR will be updated in the Company's OMS. As restoration work plans are developed in conjunction with SERT personnel, Regional (County), Local (Town/Municipal) and customer specific ETRs are determined for the top 95% of customers affected. These ETRs are then updated in the Company's OMS and are then available on the Company's Internal (OMS) Dashboard (internal) and the Company Outage Map (external). Once all Regional ETRs have been populated, all references to the Global ETR will be eliminated.

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 26

Recommendation: All electric utilities develop a post restoration review process to assess the accuracy of ETRs provided and implement corrective measures that may result from the review.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

For Storm Classification Category 2A (Serious) and above, the Company has an established process in place post-restoration to assess the accuracy of ETRs provided.

Post-restoration, the Company's ETR/IAP Branch review all ETRs, to assess accuracy and determine opportunities for improvement and implement corrective actions.

Electric ERP revision? Yes

- ERP Section 2.4 Estimated Time of Restoration (“ETR”)
- ERP Attachment 15 ETR_IAP Response and Recovery Guide

The above documents will reflect language as follows:

Post restoration, the ETR/IAP group will review all ETRs, to assess their accuracy and determine opportunities for improvement and implement corrective actions.

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 28

Recommendation: The electric utilities update their ERPs and procedures to denote the implementation of a daily predetermined timeframes for when ETRs will be reviewed and updated.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

As part of the updated ETR process, early morning (4:00 am) and afternoon (4:00 pm) planning meetings between the Planning branch (ETR, Work Plans) and the Operations branch takes place. ETRs are discussed and plans are made to make any necessary ETR updates. Actual ETR updates take place after the planning meetings (within three hours). The Company has updated Section 2.4 Estimated Time of Restoration (“ETR”).

Electric ERP revision? Yes

- ERP Section 2.4 Estimated Time of Restoration (“ETR”); Paragraph 6:

Added content: During the course of restoration, the Company will refine ETRs and communicate them through updates to incidents within the Outage Management System. As part of the updated ETR process, early morning (4:00 am) and afternoon (4:00 pm) planning meetings between the Planning branch (ETR, Work Plans) and the Operations branch takes place. ETRs are discussed and plans are made to make any necessary ETR updates. Actual ETR updates take place after the planning meetings (within three hours). These updated ETRs are then conveyed in communications via CSRs, the IVR, text messages, and the Company Outage Map.

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 31

Recommendation: During emergency restoration all field crews report directly to their assigned work location after receiving their job briefings and assignments.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company has an established practice to have field crews report directly to their assigned work location after receiving job briefings and assignments during emergency operations.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 32

Recommendation: To minimize delays in getting work packages to crews, all electric utilities use field support resources to deliver work packages to external crew foremen at their hotels in the early morning and crew guides provide job briefings to mutual assistance and contractor crews at the work locations.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company uses either a lead from within the Crew Guide storm function or Mutual Aid Support Staffing to collect/distribute work packages directly to the Crew Guides at their hotels/work-out locations.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 34

Recommendation: All electric utilities identify the feasibility to contract with third parties that can perform crew guide functions and modify their ERPs on how to access these resources.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company utilizes a third-party vendor to provide qualified individuals as crew guides and to assist with managing mutual assistance crews (ERP Section 5.13). Section 4.2 of the May 20, 2019 ERP will be revised to include such language.

Electric ERP revision? Yes

- Section 4.2: System Emergency Restoration Team (SERT), Mutual Assistance Coordination

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 36

Recommendation: All electric utilities have readily available crewing information for all circuits being worked each day.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

This is currently a reporting/sorting feature in the Company's outage management system.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 37

Recommendation: All electric utilities identify what work is occurring on a town/municipality basis to enable municipal liaisons to have better visibility on the restoration progress, which will improve communication and coordination with local officials and other stakeholders

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

OMS currently has the capability to sort the work that is occurring on a town/municipality basis, thereby providing the visibility necessary for communications and coordination with local officials and other stakeholders.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 38

Recommendation: All electric utilities develop best practices to ensure that tree crews are better aligned with line crews to minimize delays in clearing hazards prior to restoration activities.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company's outage management system currently provides the ability to denote tree crew requirements on a job level basis. Job are dispatched and aligned to include various crewing requirements.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 39

Recommendation: The electric utilities and telecommunications providers develop templates and other aids to ensure appropriate detailed information is shared during a storm event, including the contact information for individuals activated during the event.

Timeframe for Completion: Medium (within six months)

Company Response: Accept

Status of Recommendation: In Progress

The Company is in the process of scheduling meetings with telecommunication companies to discuss this recommendation.

Key Protocols / Procedures:

- ERP Attachment 11: Joint Use Response and Recovery Guide

Key Constraints:

- The Company cannot guarantee the telecommunication providers participation and/or acceptance

Electric ERP revision? No

Work Plan:

Meetings are being scheduled with the telecommunication companies to review and potentially update the existing Joint Use Response and Recovery Guide.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Meetings with telecommunication companies	May 1, 2019	June 30, 2019
Current State Analysis		
Design & Implementation		
Updated plan and procedure		July 31, 2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 40

Recommendation: The electric utilities modify their ERPs to clarify when representatives from telecommunications providers should be co-located in their EOCs and the process for communicating such a request as well as the reporting location(s) and the names and contact information of the assigned electric utility representative(s) located within the EOCs. Telecommunications providers also need to develop or modify their procedures to identify personnel to be co-located and ensure such action is taken.

Timeframe for Completion: Medium (within six months)

Company Response: Accept

Status of Recommendation: In Progress

Currently communication between utilities is handled via conference calls and email. The Company is in the process of scheduling meetings with telecommunication companies to discuss this recommendation. The goal of these meetings is to reach an agreement with telecommunication companies on when to utilize co-location and where that location may reside. In past discussions, telecommunication companies have been reluctant to co-locate due to resource issues. If we cannot reach an agreement, at a minimum the Company will invite representatives of the telecommunication companies to the EOC during storms and let them determine whether they can send such representatives.

Key Constraints:

- Reaching agreement with telecommunication companies on an update to the Joint Use Response and Recovery Guide

Electric ERP revision? Yes

- Attachment 11: Joint Use Response and Recovery Guide

Work Plan:

- Convene scheduled meetings with telecommunications companies.
- Reach agreement on co-location of resources during storms, if achievable.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Meetings with telecommunication companies	May 1, 2019	June 30, 2019
Current State Analysis		
Design & Implementation		
Updated Attachment 11		July 31, 2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 41

Recommendation: The electric utilities and telecommunications providers develop a process to practice the communications and pole installation process as part of drills or other exercises and perform after actions and lessons learned reviews to identify process improvements.

Timeframe for Completion: Medium (within six months)

Company Response: Accept

Status of Recommendation: In Progress

The Company is in the process of scheduling meetings with telecommunication companies to discuss this recommendation.

The Company's Joint Use Group also meets with the telecommunication companies multiple times per year, and will review adding an exercise component to the meeting(s).

Key Constraints:

- Attendance of telecommunication companies at scheduled exercises.

Electric ERP revision? No

Work Plan: Scheduling meetings with the telecommunication companies.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Meetings with telecommunication companies	May 1, 2019	June 30, 2019
Current State Analysis		
Design & Implementation		
Include telecommunication companies in Annual Emergency Operations Exercises.		

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 42

Recommendation: All electric utilities, except PSEG LI as it does not have borderline customers, ensure borderline customers are easily distinguished in OMS and review their procedures related to communicating outages to and obtaining ETRs from neighboring utilities. Modifications to the ERPs shall be made accordingly.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

- Reviewed circuit denotation for borderline customers in OMS, checked for accuracy.
- Distribution Control Center operators reviewed procedures related to communicating outages to and obtaining ETRs from neighboring utilities.
- Added language in Section 2.10 of the May 20, 2019 ERP

Key Protocols / Procedures:

- Distribution Control Center Guide: G-10-DCC-1 Borderline Customers
- Customer Assistance Department: Training Document, Borderline Accounts
- ERP Section 2.10

Electric ERP revision? Yes

- Section 2.10, Communication and Coordination between Utilities

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 43

All electric utilities meet with county officials semi-annually, at a minimum, to review critical facilities lists and circuit maps to verify their completeness and accuracy. All modifications (additions, deletions) shall be captured and incorporated into revised lists, which will be provided to the county. The ERPs shall incorporate this requirement.

Timeframe for Completion: Medium

Company Response: Accept

Status of Recommendation: In Progress

Key Protocols / Procedures:

- ERP Section 1.3: Planning Compliance and Responsibilities
- ERP Attachment 4: Restoration Priorities Matrix
- ERP Attachment 13: Priority Response Group (PRG) Response and Recovery Guide

In accordance with the December 15, 2018 ERP, Section 1.3 Plan Compliance and Responsibilities; under Annual Review and Updates, the Company completes a semi-annual outreach to all Offices of Emergency Management and municipalities requesting updates of all critical facilities.

The results of the outreach are incorporated into a revised list. The critical facilities are categorized in accordance with ERP, Section 2.5 Trouble Call Process (Critical Facility Types).

In addition, the PRG in conjunction with the Regional and Community Affairs team conducts meetings and outreach sessions with municipalities throughout the service area requesting updates of critical facilities. As a result of these meetings, the PRG has captured and compiled municipal contact information, which the Company will use to exchange priority information requests and updates during a significant weather event.

The Company will be coordinating with county officials to determine the best utilization of county maps.

Electric ERP revision? Revisions will be included in the next annual filing in the following areas:

- Section 1.3: Planning Compliance and Responsibilities
- Attachment 4: Restoration Priorities Matrix
- Attachment 13: Priority Response Group Response and Recovery Guide

Work Plan: N/A

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
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Planning		
Meet with County Officials	May 20, 2019	November 20, 2019
Current State Analysis		
Design & Implementation		
Inclusion in PRG Work Plans	May 20, 2019	November 20, 2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 44

Recommendation: Each electric utility coordinate with county officials to identify residential developments with large elderly populations or other similarly vulnerable establishments and code them as priority level 3 critical facilities.

Timeframe for Completion: Medium (Within six months)

Company Response: Accept

Status of Recommendation: In Progress

The Company will coordinate with county officials, within the Company’s service territory, to identify residential developments with large elderly populations or other similarly vulnerable establishments and code them as priority level 3 critical facilities.

Electric ERP revision? Yes

- TBD upon completion of the Work Plan
 - Add sub-bullet to Critical Facility Level 3 (Section 2.5) defining “residential developments with large elderly populations or other similarly vulnerable establishments.”

Work Plan:

- Meet with county officials to identify residential developments with large elderly populations or other similarly vulnerable establishments.
- Update Company database (Customer Information Management System “CIMS”) to code as priority level 3 critical facilities.
- Update ERP Section 2.5.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Meet with County Officials	5/20/2019	11/20/2019
Current State Analysis		
N/A	N/A	N/A
Design & Implementation		
Update CIMS	5/20/2019	11/20/2019
Update ERP	5/20/2019	11/20/2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 45

Recommendation: All electric utilities coordinate with county officials to prioritize the restoration sequence of critical facilities during a major storm event. Communications with counties should be on a structured time schedule to allow these jobs to be included in work packages for the next day. Additionally, this prioritization should be part of future exercise and incorporated into the ERPs.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Key Protocols / Procedures:

- Emergency Response Plan Section 2.7 - Restoration Strategy
- Emergency Response Plan Attachment 13 - Priority Response Group (PRG) Response and Recovery Guide

In the ERP filed on May 20, 2019, the Company will revise the above procedures to clarify and/or incorporate language such that the Company will coordinate, on a structured time schedule, with county officials to prioritize the restoration sequence of critical facilities during a major storm event (Storm Classification: Serious 3A and above) to allow these jobs to be included in work packages for the next day.

In addition, the above procedures will be revised to incorporate language regarding this process being included in the future exercises (*e.g.*, the annual exercise).

Electric ERP revision? Yes

- Attachment 13 - Priority Response Group (PRG) Response and Recovery Guide (Page 7, FUNCTION 2 - PRIORITY RESTORATION)
- ERP Section 2.7: Restoration Strategy (Paragraph 2)

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 46

Recommendation:

For outages that are escalated by a county, either through the liaisons or the other contact, utilities must be prepared to provide direct communications between decision-makers and counties to enable coordinated response efforts.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Currently, outages related to critical infrastructure that are escalated from the County (be it through a liaison or another contact) are communicated to the CRT Command Center who escalates the issue to the proper level of authority in the Incident Command Structure for a prompt response and coordination with the county. In addition, ORU's Emergency Preparedness storm function hosts daily calls with the County EOC Directors. These calls provide an avenue for escalated critical infrastructure issues to be addressed as well.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 47

Recommendation: All electric utilities investigate historical outage information and circuit maps to identify potential investments that will increase reliability to critical facilities that counties consider essential.

Timeframe for Completion: long term (> 6 months)

Company Response: Accept

Status of Recommendation: In Progress

ORU provides electric service to customers in Sullivan, Orange, and Rockland counties. Earlier this year, ORU received an updated list of critical facilities from each county. These locations have been identified in ORU’s GIS system and outage data is currently being collected. ORU will review the performance of the circuit/segment supplying each site to identify potential investments to improve reliability. The results of this review will be used to assist in project selection/prioritization in the upcoming budget cycle. Full implementation of the plan may occur through longer-term planning and over several budget cycles.

Electric ERP revision? No

Work Plan: See below

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Obtain critical facility list from each county	4/22/2019	4/23/2019
Associate premise numbers with each identified facility	4/23/2019	5/1/2019
Collect outage data	5/3/2019	5/31/2019
Review outage data to identify potential investments. Evaluate and recommend investments or accelerate planned investment where appropriate. Provide final project list with justifications.	6/1/2019	12/31/2019

Summary of Costs:

Internal Engineering resources will be used to obtain and evaluate the data and prepare recommendations. Additional / incremental capital resources will need to be approved and allocated for any recommended investments in the Company’s upcoming budget cycle. Full implementation of the plan may occur through longer-term planning and over several budget cycles.

Recommendation Number: 48

Recommendation: All electric utilities develop and document within their ERPs pre-determined time periods for press release issuance and dissemination that coincides with local news cycles.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will adopt this recommendation to develop and document within its ERP pre-determined time periods for press release issuance and dissemination that coincide with local news cycles. O&R will issue at least one morning and one evening press release each day during a storm event.

The following language has been incorporated into the ERP May 20, 2019:

“The Company will issue at least one morning and one evening press release each day during a storm event.”

Electric ERP revision? Yes

- ERP Section - 2.3 Communications – Public Information

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 49

Recommendation: All electric utilities develop a process that permits press releases and related information updates outside of normal media cycles, only as events warrant; for example, a change in the global ETR. This shall be incorporated into their ERPs.

Timeframe for Completion: N/A

Company Response: Accept


Status of Recommendation: Complete

The Company's current process allows for press releases and related information updates outside of normal media cycles as events warrant (e.g., if there is a change in the global ETR). The Company will incorporate this process into the ERP filing on May 20, 2019 by adding the following language:

"Additional press releases will be distributed as important changes occur or events warrant."

Electric ERP revision? Yes

- ERP Section - 2.3 Communications – Public Information



Media Relations
845-577-2430 (24 hours)

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Orange & Rockland
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FOR IMMEDIATE RELEASE | CONTACT: Media Relations

O&R: BIGGEST OUTAGE AREAS TO GET MOST POWER BACK BY MIDNIGHT

PEARL RIVER, NY, February 25, 2019 4:30 p.m. --- More than 10,500 O&R electric customers have lost power as a result of the severe windstorm that has pummeled the region since early last evening.

O&R has made repairs to return electric service to approximately 8,000 of those customers, and is working to restore power to the remaining nearly 2,500 who are still without power as the winds continue to roar.

O&R expects that the areas with the largest concentration of outages in each county O&R serves should see virtually all those outages returned to service by midnight tonight.

That means that in:

Orange County, with approximately 750 customers out, will see Florida, Tuvedo Park Village, Warwick Town, Deer Park, Walkkil and Monroe virtually all restored by midnight tonight.

Rockland County, with about 600 customers out, will see Stony Point, Ramapo, Clarkstown and Orangetown virtually all restored by midnight tonight.

Passaic County, with over 400 customers out, will see West Milford virtually all restored by midnight tonight.

Sullivan County, with about 330 customers out, will see Mamakating and Lumberland virtually all restored by midnight tonight.

Bergen County, with approximately 100 customers out, will see Mahwah virtually all restored by midnight tonight.

These figures are as of 3:45 p.m. today. For the latest storm outage numbers, please go to [O&R's outage map](#).

Weather forecasters expect that the storm's high winds will begin to taper off this evening.

To help its customers weather the storm, O&R offers these tips:





- For safety's sake, don't touch or approach any downed wire. Assume it is energized and dangerous. Call O&R immediately toll-free 1-877-434-4100. Depending on the situation, you may also want to call your local police to divert traffic until an O&R crew arrives.

- Maintain a distance of at least 50 feet from downed wires and anything they are in contact with including puddles of water and fences. Supervise your children so that they are not in the vicinity and keep pets on a leash or otherwise secure.
- If a fallen wire is draped over a car, do not approach the car and make rescue attempts. Remain a safe distance away and try to keep the occupant of the vehicle calm. If possible, emergency personnel should handle the situation.
- Pole-top transformers --- those small grey-colored metal drums attached to the wires at the tops of most utility poles --- also should be avoided when they have been knocked to the ground.
- Portable generators pose a serious hazard if used improperly. They should be used and installed according to the manufacturer's instructions. A wrong connection could feed electricity back through the lines and endanger our repair crews. Never plug a generator into a wall unit, use it indoors or set it up outdoors near open home windows or air-handling vents.
- When temperatures dip and you're without power, don't use a natural-gas-powered oven or range to heat a room, and do not use a charcoal grill inside your home. Doing so could create either a fire hazard or a life-threatening exposure to carbon monoxide gas.
- Have emergency equipment within reach --- portable radio, flashlights, spare batteries, first aid kit, cell phone and important medications. Keep O&R's toll-free number 1-877-434-4100 near the phone to report power outages.
- If you experience a power outage, don't assume that O&R automatically knows about it or that someone else will report it. To be sure the outage is reported, please call O&R toll-free at 1-877-434-4100 to let O&R know what happened. The more information you can provide, the more O&R can help you.
- Remember, if the base station of your cordless phone plugs into the wall, your phone will be unusable during a power outage.

There are several ways customers can report outages and check service restoration status:

- Go to the [O&R website](#) from any computer or web-enabled mobile device;
- Use the O&R mobile app from your iPhone, iPad or Android device;
- Text "OUT" to 69678 ([myORU](#)); or
- Call Customer Assistance at 1-877-434-4100

The following video describes the typical storm repair and power restoration process: https://youtu.be/JeGU8ID4_m0

2019
#16
Connect With Us:
   

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 50

Recommendation: All electric utilities, and NYSEG/RGE in particular, delineate and clearly state which part(s) of its service territory, including counties affected, is being addressed in all press releases and on social media, especially for utilities with a large or multi-state presence, such as Avangrid (Parent company of NYSEG and RGE), National Grid and Orange & Rockland. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will continue to follow guidelines in this recommendation to delineate and clearly state which part(s) of its service territory, including counties affected, is being addressed in all press releases and on social media. This process will be incorporated into the ERP filing on May 20, 2019 with the following language:

“All press releases and social media posts will clearly state which part(s) of its service territory - including counties - are affected.”

Electric ERP revision? Yes

- Relevant ERP Section – 5.9 Corporate Communications

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.



Orange & Rockland
a conEdison, inc. company

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FOR IMMEDIATE RELEASE

CONTACT: Media Relations
(914) 329-1999

O&R: POWER RESTORED TO ABOUT 5,100 CUSTOMERS FROM STORM

PEARL RIVER, NY, February 25, 2019 10:30 a.m. — O&R crews have repaired damage to restore electric service to approximately 5,100 customers whose power was knocked out by damage caused by the severe windstorm that began about 8 p.m. yesterday and is continuing through the day today.

At this hour, about 2,100 customers are without power and are due for repair. These figures are as of 9:45 a.m. today. For the latest storm outage numbers, please go to O&R's outage map.

Company and contractor overhead line crews and tree removal crews have been mobilized to Storm Alert status and are deployed, as are damage assessment, site safety, customer service operations and the wide array of O&R teams that support those functions.

In addition to its company crews, O&R has hired 52 additional overhead line technicians to supplement its own field forces to repair damage and restore service interruptions resulting from this event.

Weather forecasters expect that the storm's high winds will begin to taper off this evening.

O&R's Service Restoration Strategy

- Clearing downed power equipment for public safety and to help open major roads and restoring service to critical facilities like hospitals and police and fire stations are O&R's top restoration priorities.
- From there, O&R's overall service restoration strategy aims to get power back on safely to the largest number of customers in the shortest amount of time.
- That means substations and transmission lines are first,
- Then distribution lines, secondary lines and
- Finally service lines that restore power to individual homes.

Here are the outage numbers by county at 9:45 a.m. today. For the latest outage numbers, please go to O&R's Outage Map:

Orange – 493 (103,616 total served by O&R)
Sullivan - 5 (9,112 total served by O&R)
Rockland – 1,621 (117,243 total served by O&R)
Bergen – 20 ((58,677 served by Rockland Electric Co.)
Passaic – 1 (13,262 served by Rockland Electric Co.)
Sussex – 6 (337 served by Rockland Electric Co.)

Recommendation Number: 51

Recommendation: For regional press releases issued by all electric utilities, particularly NYSEG, clearly state the regions and counties covered by each press release.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will continue to follow guidelines in this recommendation to state clearly the regions and counties covered by each press release. The Company will align actions it takes to meet this recommendation with those covered in recommendations 50 and 55.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.



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O&R has made repairs to return electric service to approximately 8,000 of those customers, and is working to restore power to the remaining nearly 2,500 who are still without power as the winds continue to roar.

O&R expects that the areas with the largest concentration of outages in each county O&R serves should see virtually all those outages returned to service by midnight tonight.

That means that in:

Orange County, with approximately 750 customers out, will see: Florida, Tuxedo Park Village, Warwick Town, Deer Park, Walkill and Monroe virtually all restored by midnight tonight.

Rockland County, with about 600 customers out, will see: Stony Point, Ramapo, Clarkstown and Orangetown virtually all restored by midnight tonight.

Passaic County, with over 400 customers out, will see West Milford virtually all restored by midnight tonight.

Sullivan County, with about 330 customers out, will see Mamakating and Lumberland virtually all restored by midnight tonight.

Bergen County, with approximately 100 customers out, will see Mahwah virtually all restored by midnight tonight.

These figures are as of 3:45 p.m. today. For the latest storm outage numbers, please go to [O&R's outage map](#).

Weather forecasters expect that the storm's high winds will begin to taper off this evening.

Recommendation Number: 54

Recommendation: Orange & Rockland cease from issuing excessive numbers of press releases with stale or information that was included in a previous/recent release, or issue press releases with only safety tips.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will adopt this recommendation to reduce the number of press releases issued each day. O&R will issue at least one press release in the morning and one in the evening each day during a storm event. Those releases will be crafted to provide the freshest storm-related information possible.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 55

Recommendation: Orange & Rockland issue New York-specific press releases or, in the alternative, clearly state what information in each press release applies to New York or New Jersey. Orange & Rockland's ERP will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will adopt this recommendation to state clearly in each press release what information applies to New York and what information applies to New Jersey. ORU will revise the ERP to incorporate the following modification in the May 20, 2019 filing:

“All press releases will clearly state what information applies to New York and what information applies to New Jersey.”

Electric ERP revision? Yes

- Relevant ERP Section – 5.9 Corporate Communications

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 56

Recommendation: As a best practice, all electric utilities develop a process that captures customer feedback and frequent questions through social media and the call center so the PIO can incorporate this information in subsequent press releases during an event. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company currently canvasses its Social Media managers and will additionally canvass Call Center Supervisors for guidance on issues that are sources of significant numbers of postings/phone calls. If appropriate, the Company will use a subsequent press release so that the public is aware of the issue(s) that the Company is addressing.

This process shall be incorporated into practice, and drafted into the ERP by the May 20, 2019 filing with the following language:

“Corporate Communications will coordinate with O&R’s social media and call center departments to review significant customer issues that have emerged. These issues will be addressed in the next scheduled press release, if needed.”

Electric ERP revision? Yes

- Relevant ERP Section – 5.9 Corporate Communications

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 57

Recommendation: Con Edison and Orange & Rockland's blast emails contain narrative text with event-related and utility contact information in the body of the email as well as an embedded link referring to the utilities' storm page on its website. Con Edison and Orange & Rockland's ERP will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company has updated its email blasts. New email blasts include more information for the customer including informing them that they need to report their outage, a clear call to action to report, and several methods of contacting us including app, web, and phone. The Company conducted post-storm customer research that enabled it to refine email blast content and length to align to customer needs.

This process will be incorporated into the ERP by May 20, 2019 with copy to read as follows:

"All storm Email blasts will include the following information for customers: informing them that they need to report their outage, a clear call to action to report, and several methods of contacting us including app, web, and phone."

Electric ERP revision? Yes

- Section 5.9: Corporate Communications

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

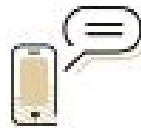


Before Severe Weather Strikes, Be Prepared

Make sure you know what to do if you lose power.

[Report an Outage](#) →

Stay away from downed power lines. Always assume they are live.



We're keeping watch and staying ready, and want you to be ready, too.

To receive updates about power outages at your home or business, you must report them yourself. Contact us even if you think we already know.

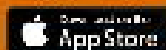
- ✓ Sign up to receive text message alerts on outages that affect your electric service. Register now by logging in to [My Account](#) and selecting User Preferences.
- ✓ If you do lose power, report outages at [onu.com](#), text DUT to 69678 (myORU), or call 1-877-434-4100.
- ✓ [Check your status](#) online and see what's happening in your neighborhood with our [outage map](#).
- ✓ Have special needs? [Make sure we know](#).

Get a checklist on how to prepare for major outages, step-by-step directions for dealing with a power outage, and details about how we restore power.

[Learn More Now](#) ⓘ

You may receive emergency text alerts from us. If you no longer wish to receive these text notifications, text STOP to 69678. Message and data rates may apply to text messages.

Manage your account on the go. Download the Orange & Rockland app.



Recommendation Number: 59

Recommendation:

All electric utilities provide their respective municipal liaisons with information necessary to support effective communication between the utility and the counties.

Timeframe for Completion: Long Term

Company Response: Accept

Status of Recommendation: In Progress

In order for the municipal liaisons to have the information necessary to support effective communication, O&R has a SharePoint site dedicated to this storm function. The SharePoint site contains municipal contact information, a critical Infrastructure list for all municipalities, a municipal liaison "To Do" List and the Storm Restoration Matrix. In addition, liaisons are trained and have access to ORU's OMS Dashboard, NRG Mapping, On-line Trouble Order reporting and the ORU Outage Map (links are included). Throughout a storm event, liaisons receive every blast e-mail of press releases sent to municipal officials and are invited to listen to every municipal conference call.

The liaisons are required to take five on-line training courses each year on the Roles and Responsibilities of the CRT (liaison), the OMS Dashboard, NRG Mapping, the ORU Electric Distribution System and Gas Distribution System. Every liaison is required to complete classroom training each year and complete three "At-Your-Desk" exercises that test their knowledge of the OMS Dashboard and NRG Mapping System.

In order that liaisons have the information they need, the Company will reorganize and streamline the SharePoint site to be more efficient in the way information is presented. This will make for a better user experience by the liaisons which will assist them in timeliness of their response to inquiries.

The liaisons will be provided with a copy of the daily work plan at 5:00 AM and 5:00 PM that provides the areas that will be restored in the operational period. The liaison will disseminate this information to the municipal officials by one of the following means: a briefing, a telephone call or a blast e-mail.

Pursuant to Recommendation 60, the Company will develop an information packet for each of the CRT predesignated locations (which includes the counties).

The ORU Outage Map is currently undergoing an upgrade that will be completed in September 2019. Training sessions will be held with the liaisons so they understand the outage map enhancements.

Electric ERP revision? No

Work Plan:

- Review and revise current CRT Share Point Site
- Develop a process for the liaisons to distribute the Daily Work Plan
- Develop information “packets” – Details and costs will be in ORU’s response to Recommendation 60

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Evaluate current CRT Share Point Site	May 20, 2019	June 20, 2019
Develop criteria for distribution of the Daily Work Plan	May 20, 2019	June 20, 2019
Develop training on outage map enhancements	September 30, 2019	October 30, 2019
Current State Analysis		
NA		
Design & Implementation		
Complete CRT Share point Site reorganization	June 20, 2019	September 20, 2019
Share process with liaisons for distribution of daily work plan	June 20, 2019	July 20, 2019
Completed training on outage map enhancements	October 30, 2019	December 31, 2019

Summary of Costs:

ORU’s incremental costs associated with the implementation of this recommendation will be less than \$1,000 for training materials.

Recommendation Number: 60

Recommendation:

To ensure liaisons are aware of the area they are representing, all electric utilities establish a packet of local information including circuit maps, contact information for EOCs and municipal officials, and lists of critical facilities and LSE customers that can be provided to liaisons. The ERPs will incorporate this modification.

Timeframe for Completion: Long term

Company Response: Accept

Status of Recommendation: In Progress

In order that municipal liaisons are aware of the areas they are representing, the Company has a SharePoint site dedicated to this storm function. The SharePoint site contains municipal contact information and a critical Infrastructure list for all municipalities. In addition, the liaisons have real time access to O&R's OMS Dashboard. The Dashboard displays information about outages including the circuit that the customers are fed from and a list of all LSE customers without power, which is sortable by municipality.

The Company will develop an electronic packet of information for each of the pre-designated liaison locations (Community Response Team - CRT) that will contain the specific municipal contact information, critical infrastructure, a CRT "To Do" list, a geographic map and the circuit maps. The maps will provide a high level view of the substations and circuits that serve each area.

Electric ERP revision? Yes

- Attachment 14 – Regional & Community Affairs – Section 2.3

Add the following language: "The CRT will have a packet of information specific to the assigned CRT location that will include, but is not limited to, municipal contacts, critical infrastructure, circuit maps and CRT 'To Do' list for use as reference tools to communicate with municipal officials."

Work Plan:

- Determine if there is customer relationship software that is available so the data can be housed in one database that can be updated on a regular basis.
- Purchase software
- Hire an Information Technology contractor to program, populate database and create the packets.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Research possible suitable software solutions	May 20, 2019	August 20, 2019

Develop packet information sources	May 20, 2019	August 20, 2019
Purchase Software (if feasible)	August 20, 2019	November 20, 2019
Identify and hire IT contractor	November 20, 2019	January 20, 2020
Current State Analysis		
N/A		
Design & Implementation		
Build out of Packets	January 20, 2020	April 20, 2020
Training liaisons in use of circuit maps	April 20, 2020	June 20, 2020

Summary of Costs:

If a suitable software solution can be identified the potential cost could exceed \$75,000. The cost of the IT Contractor is anticipated to be \$30,000.

Recommendation Number: 61

Recommendation:

The electric utilities' exercises involving liaisons should endeavor to include liaisons who are not typically located in that region. The ERPs will incorporate this modification.

Timeframe for Completion: Medium (< six months)

Company Response: Accept

Status of Recommendation: In Progress

As part of the Company's on-going efforts to work closely with its municipal partners, each year the Company holds a number of table top exercises with County EOCs and at O&R pre-designated Community Response Team ("CRT") locations. The Rockland County EOC Tabletop drill was conducted on January 16, 2019. In addition, the Company plans to complete tabletop exercises at the Orange and Sullivan County EOC's, the Port Jervis OEM, the Haverstraw Police Department and the Highland Falls Police Department. Based upon the Company's CRT matrix, on average there are 6-8 employees assigned to each location. All personnel will be invited to participate in the tabletop. In addition, the Company will invite CRT members normally assigned to other CRT locations in that respective County (the Company has multiple locations in each County) who normally would not staff that respective location.

Electric ERP revision? Yes

- Attachment 14 – Regional & Community Affairs Response and Recovery Guide, Section 5.6 - Training Plan and Drill

Work Plan:

- Schedule CRT Tabletop Exercises
- Invite CRTs not normally assigned to that location from the same county the location is located in
- Track attendees through attendance sheets

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Scheduling of tabletop exercises	June 1, 2019	December 1, 2019
Current State Analysis		
N/A	N/A	N/A
Design & Implementation		
Completion of tabletop exercises (see attached presentation)	June 1, 2019	December 1, 2019
Tracking of attendees (Attendance	June 1, 2019	December 1,

sheets)		2019
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Summary of Costs:

The Company's incremental costs associated with implementing this recommendation will be approximately \$1,000.00 for employee mileage.

Recommendation Number: 63

Recommendation:

All electric utilities improve communication with municipalities by encouraging municipal officials to report specific issues to their county EOCs, leaving the municipal calls to serve as brief updates for the affected area(s) as a whole and leaving individual issues to be addressed using other communication avenues, including, but not limited to, municipal liaisons.

Timeframe for Completion: N/A

Company Response: Modify

Status of Recommendation: Complete

The Company would suggest that the recommendation be modified for utilities to encourage municipalities to report specific issues to the liaison (Community Response Team member – CRT at O&R) and the CRT Command Center (O&R specific) prior to the municipal calls. Historically, ORU has found that since New York is a home rule state, municipalities will operate independent of the County EOCs. To address specific issues prior to the municipal calls, the Company includes contact information in every blast e-mail sent to the municipalities. The Company also has modified the municipal call invitation to reflect the contact information for the CRT Command Center. The modified invitation language also encourages municipalities to report critical issues to their County EOCs.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 64

Recommendation:

During municipal calls, all electric utilities discuss, at a high-level, the hardest- hit areas, what has been accomplished since the last call and the work plan for the following day. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Modify

Status of Recommendation: Complete

Currently, the Company provides information on the hardest hit areas, along with high level information on the work plan in the current operations period. The Company requests that this recommendation be modified to reflect its current way of doing business. Rather than the call providing the work plan for the following day, the Company provides a high level overview of the work plan for the next 12-hour operational period. The reason for this is that the operator assisted municipal conference calls are typically held in the early afternoon and the actual planning for the following day's work is done on the overnight shift. The Company would be providing more accurate information on what would be planned on the next operational period which typically is from 5 AM – 5 PM and 5 PM – 5 AM. Essentially, we provide the work plan for the upcoming overnight (5 PM – 5 AM) period.

Electric ERP revision? Yes

- Section 4.6 – Regional & Community Affairs – Workflow

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 65

Recommendation:

All electric utilities include in the call invitation a detailed agenda covering what will be discussed in each call, any information regarding the correct venues or channels to report municipal-specific issues, and ways to access updates through outage maps or liaisons. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

ORU has modified the operator assisted municipal conference call agenda to reflect the multiple ways to report an outage and obtain restoration updates (*i.e.*, the liaison, the Community Response Team Command Center, the electronic trouble order form for municipal officials and the O&R website).

Electric ERP revision? Yes

- Section 4.6 – Regional & Community Affairs, Workflow

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 66

Recommendation:

All electric utilities exclusively use operator-assisted systems with line-muting capability for the municipal calls to minimize disruptions and to streamline the calls, specifically for the roll call and question-and-answer session. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company currently uses Intercall Services for operator assisted conference calls. This service allows for line muting capabilities and callers with questions must register with the operator and they are placed in the order received. The service provides an attendee list, options for a written or audio transcript and the ability for callers to request a replay (encore) presentation of the call.

During the March and May 2018 storms, the NYDPS monitored the calls and the Company submitted the documentation referenced above via its Part 105 report and subsequent interrogatories.

Electric ERP revision? Yes

- Section 4.6: Regional and Community Affairs – Workflow

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 68

Recommendation:

The electric utilities semi-annually update municipal and elected official contact lists on prescribed dates and provide a document to officials detailing the methods to contact the utility if any information changes in the interim. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company will complete the semi-annual update of municipal and elected official contact lists in February and August. The Company has modified the e-mail and contact information verification sheet to reflect that updates throughout the year can be sent directly to the e-mail address of the Associate Specialist in Strategic Partnerships or to the Regional & Community Affairs Manager.

Electric ERP revision? Yes

- Attachment 14 – Regional & Community Affairs Response and Recovery Guide, Section 6.4

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 69

Recommendation:

All electric utilities survey the municipal leaders and elected officials to determine if the Municipal Calls are useful, if there is a better method to distribute information, and what information is required. The ERPs will incorporate all agreed upon changes.

Timeframe for Completion: Medium (< six months)

Company Response: Accept

Status of Recommendation: In Progress

The Company will develop a survey using an electronic tool, such as Survey Monkey, to solicit feedback from municipal officials. The Company will implement the survey before June 30, 2019. The results will be reviewed and the best practices incorporated into Section 4.6 of the ERP.

Electric ERP revision? Will be incorporated in the next annual ERP filing

Work Plan:

- Design survey
- Implement survey
- Review results
- Identify best practices
- Modify ERP

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Develop survey	May 20, 2019	June 11, 2019
Current State Analysis		
Design & Implementation		
Conduct survey	June 20, 2019	July 15, 2019
Analyze data, identify best practice	July 15, 2019	August 15, 2019
Incorporate Changes in ERP	November 1, 2019	November 20, 2019

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 70

Recommendation: All utilities establish a website banner noting any known deficiencies or issues related to ETRs and when updated information can be expected. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company's Website (oru.com) and Outage Map both have existing banners that can be activated and updated by trained company personnel in local or remote locations. The ORU Outage Map banner has been used for this exact scenario to communicate errors and inconsistencies in the outage Maps ETR displays during a storm.

The Company will incorporate this process into the ERP by May 20, 2019 by adding the following language:

"A website banner will be displayed on ORU.com noting any deficiencies or issues related to ETRs or any other important information for customers."

Electric ERP revision? Yes

- Section 2.3: Outbound Communications Strategy

Work Plan: N/A

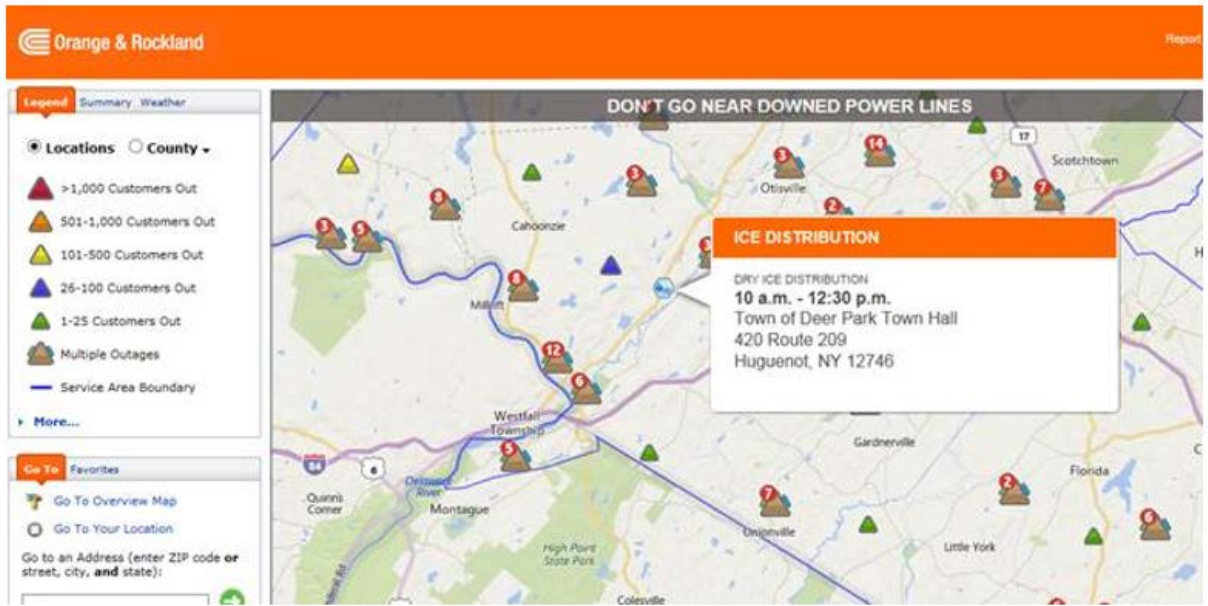
Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

March 10, 2018, 10 am

The screenshot shows a web browser window displaying the Orange & Rockland website. The browser's address bar shows the URL "Consolidated Edison Company of New York Inc [US] oru.com/en". The website features a red banner with two alerts: "ALERT: If you have not reported an outage, please contact us. REPORT AN OUTAGE" and "RESTORATION UPDATE: With approximately 10,000 customers remaining out of service, and over 950 field personnel deployed, we expect to have complete power restoration in Sullivan and Bergen counties, and the vast majority of Rockland customers restored by midnight Sunday night." Below the banner is a navigation menu with the Orange & Rockland logo and links for "Account & Billing", "Services & Outages", "Save Energy & Money", "Our Energy Future", "Search", and "Log In or Register". The main content area features a large image of a smiling utility worker in an orange shirt in front of a warehouse, and another image of a utility worker on a tower at night. The text "Pay Your" and "Your Outage Recovery" is overlaid on these images. The Windows taskbar at the bottom shows the search bar, taskbar icons, and system tray with the time "9:55 AM 3/10/2018".

March 4, 2018 – 12:30 am - Two Dry Ice Locations have also been added to the outage map.



Recommendation Number: 72

Recommendation: All storm-related website pages include a timestamp indicating when the information was posted and updated. If no new information is available over an eight hour period, the electric utilities need to revise the timestamps on applicable pages to clearly show the public that the information is accurate. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company provides timely storm-related information primarily in timestamped press releases. As new information becomes available, subsequent press releases will be posted on the website. Also, the outage map, available to the public, is updated every 15 minutes with timestamps. In addition, as the need warrants, the Company will produce additional storm-related pages which will be timestamped. If no new information is available over an eight-hour period, the Company will update applicable timestamps on storm-related webpages to assure customers that the information is accurate. In combination, the Company sees these as an efficient and clear approach to providing storm-related updates. The Company will update its ERP accordingly to reflect the need to show timestamps as specified above.

Electric ERP revision? Yes

- ERP Section 2.3.1 Communications: Outbound Communications Strategy

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.



Orange & Rockland
a conEdison, inc. company

Media Relations
845-577-2430 (24 hours)

Orange and Rockland Utilities, Inc.
One Blue Hill Plaza
Pearl River, NY 10965
www.oru.com

FOR IMMEDIATE RELEASE

CONTACT: Michael Donovan
845-577-2430

STORM UPDATE

O&R DELIVERS MORE DRY ICE TODAY TO FORESTBURGH

PEARL RIVER, NY Mar. 6, 2018 2:30 p.m. --- While O&R crews work to restore power to Sullivan County customers, the company today is delivering 6,000 pounds of dry ice for distribution to area residents.

O&R is delivering the bags of dry ice to the [Forestburgh Fire Department](#), 2539 Route 42, [Forestburgh, N.Y. 12777](#).

To make the dry ice available to a broader area, the [Forestburgh Fire Department](#) is splitting the dry ice with [Camp Simcha](#), 430 White Road, [Glen Spey, NY 12737](#).

The dry ice is [scheduled to arrive at the fire department](#) sometime late afternoon to early evening, and personnel from the department and the camp will coordinate the division of dry ice and the transport of [Camp Simcha's](#) share to its facility.

To confirm the delivery of the dry ice to both outlets, please call the [Forestburgh Fire Department](#) at (845) 794-7899.

O&R delivered 3,000 pounds of dry ice to the firehouse on Sunday.

For customers picking up dry ice, instructions for safe handling and disposal [are printed on the paper bag containing the ice](#). Dry ice is frozen carbon dioxide and [should be used only in well-ventilated areas](#). Keep children and pets safely away.

[MEDIA CONTACT:](#) (845) 364-4601

2018
#35

Connect With Us:



Outage Map, 030718, 4pm

View Outage Map | Orange | Orange & Rockland Sto x +

apps.coned.com/stormcenter_external_oru/default.html

Orange & Rockland Report a Power Problem / Check Status | Help

Legend Summary Weather

Outages by Area

Active Outages: 244
Affected Customers: 5,657

Go To Favorites

Go To Overview Map

Go To Your Location

Go to an Address (enter ZIP code or street, city, and state):

Go To Municipality

Last Updated: Mar 7, 4:00 PM
Information is updated every 15 minutes.

STAY AWAY FROM DOWNED POWER LINES

Outages by Area

This screen provides a list of customers served, customers without power, and an estimate of when power will be restored in each area. For each area, the estimated restoration time represents the longest duration outage within that region. Because a specific customer's estimated restoration time may be different from the area restoration time, customers are encouraged to [click here](#) to report a power problem or to check on the status of a previously reported electric service problem.

County-Municipality	State	Customers Affected	Customers Served	% Affected	ETR Type	Estimated Restoration
Bergen	NJ	1,406	58,471	2%	Global	Mar 7, 11:59 PM
Orange	NY	531	101,822	<1%	Global	Mar 9, 11:59 PM
Passaic	NJ	277	13,142	2%	Global	Mar 7, 10:00 PM
Rockland	NY	1,362	116,494	1%	Global	Mar 7, 11:59 PM
Sullivan	NY	2,070	8,884	23%	Incident Level	Mar 9, 11:59 PM
Sussex	NJ	11	336	3%	Incident Level	Mar 7, 10:00 PM

© 2018 HERE © 2018 Microsoft Corporation

4:07 PM 3/7/2018

Recommendation Number: 73

Recommendation: All utilities update their methods of tracking call center staffing during events to reflect the actual number of incoming telephone lines being serviced on a 30-minute interval basis.

Timeframe for Completion: Medium

Company Response: Accept

Status of Recommendation: In Progress

The Company will work with its vendor to develop the best tracking methods for this data for its internal resources.

Electric ERP revision? No

Work Plan:

Work with IVR Team and the Company's vendor, Altivon, to develop tracking methods for this data. The tracking method will be done through the phone system by looking at how many CSRs we have in "Available" or "On Call" status as these are the status' that indicate telephone lines being serviced. However, this granular detail may not be available for vendor resources.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Current State Analysis		
Develop reports for tracking staffing	4/29/19	6/30/19
Design & Implementation		

Summary of Costs:

The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 74

Recommendation: All utilities identify a person or group to monitor and investigate any instances of high abandon rates or reports of busy signals on its incoming call center telephone lines. The ERPs will incorporate this modification and future reports need to reflect abandon rates and busy signals.

Timeframe for Completion: N/A

Company Response: Modify

Status of Recommendation: Complete

The IVR team will continually monitor and work closely with AT&T Business Direct to investigate if there are any busy signals. These busy signals are reported to the ITP – Telecommunications Branch. High abandon rates will also be monitored and reported to Call Center management and adjustments will be made accordingly.

The Company requests a modification to the recommendation to change the word “resolve” to “investigate.”

Electric ERP revision? Yes

- ERP Section 4.4: Customer Assistance Center

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 76

Recommendation: All utilities develop proactive measures to ensure that concise, comprehensive, and accurate information is being provided in all IVR messaging. The ERPs will incorporate this modification.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company currently has a process in place that includes the following steps, which were added to the ERP for the May 20, 2019 filing in Section 5.9:

- A press release during a storm event will be initiated by the Corporate Communications group.
- Corporate Communications will add the DL – O&R Storm Quality Control group to the press release emails.
- Upon receiving the press release, O&R IVR Support team will reply to all with a confirmation e-mail that the press release was received.
- After 15 minutes time if a confirmation from O&R IVR Support is not received, Corporate Communications team will reach out to inform IVR Support that the press release has been sent.
- Once O&R IVR support has loaded the IVR with the latest press release a message will send notification to Corporate Communications and Quality Control team, noting date and time message was loaded to the IVR.
- Quality Control team will check and confirm that the press release was loaded to the IVR and that the message has the correct time stamp and press release.

Electric ERP revision? Yes

- Section 5.9: Corporate Communications

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 78

Recommendation: All utilities ensure procedures direct CSRs who speak with an LSE customer to update the customer's contact information, after addressing their concern.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

The Company has updated its LSE procedures to include the requirement to request the most up to date contact information for LSE customers when they call in. Training will be provided along with reminders to the CSRs.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 79

Recommendation: All utilities should strive to have a minimum of two alternate emergency contact telephone numbers for each LSE customer account

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Although the availability to record up to three phone numbers is available, the call center, along with Customer Support Operations (CSO), strives to collect up to three emergency contact numbers for existing LSE customers.

The Company strives to maintain updated records with each customer contact and during the annual LSE recertification process.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 80

Recommendation: All utilities certify that the LSE customer lists and information have been updated and verified at least twice a year.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

All Life Support Equipment customers currently receive from O&R a request to re-certify as part of the annual LSE classification renewal process. In addition, O&R will update its annual mailing to include a second re-certification form focusing on customers in the expired status. O&R will update its joint procedure to include the additional re-certification letter. O&R will email staff by February 1 of the following year confirming the completion of both annual re-certifications.

Key Protocols / Procedures:

- JP-0003-LSE

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 81

Recommendation: All electric utilities provide improved procedures in their ERPs, designed to eliminate the critical failures in their OMS system, as well as LSE customer notifications and site visits going forward.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

O&R's Life Support Equipment (LSE) customers who experience a loss of power are identified as LSE customers on O&R's OMS dashboard. During an event, the Special Response Team (SRT) uses an LSE Database to run outage reports for the LSE customers. SRT also uses the LSE Database and O&R's Customer Information Management System to track and log LSE telephone contact attempts and wellness visits. The telephone contact attempts and wellness visits made to the LSE customers are tracked in O&R's LSE Database. If OMS is unavailable, O&R can produce a report that does not rely on OMS data to provide a list of LSE customers that have reported an outage.

O&R updated the ERP and LSE Storm Procedure to include a more detailed narrative regarding the OMS and LSE storm customer notification process.

Key Protocols / Procedures:

- LSE Storm Procedure
- ERP Section 4.5, Special Response Team

Electric ERP revision? Yes

- Section 4.5, Special Response Team

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 84

Recommendation: NYSEG, Central Hudson, Orange & Rockland, and PSEG LI develop detailed procedures to accurately track and log LSE customer contacts.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

Customer Assistance currently has the ability to run a query of LSE calls that have come through the IVR or Medical Emergency line along with the reasons for the calls.

Electric ERP revision? No

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 85

Recommendation: All electric utilities begin distributing dry ice within 24 hours of the start of restoration when outages are anticipated to last more than 48 hours.

Timeframe for Completion: N/A

Company Response: Accept

Status of Recommendation: Complete

When outages resulting from anticipated events are expected to last than 48 hours, the Company will begin dry ice distribution within 24 hours of the start of restoration, contingent upon availability from vendors and upon accessibility of distribution centers due to issues such as road closures, down wires, or debris as well as appropriate time of day for dry ice distribution.

The Company will modify ERP Section 5.7 to include the following:

When outages resulting from anticipated events are expected to last more than 48 hours, the company will commence dry ice distribution within 24 hours of the start of restoration, contingent upon availability from vendors and upon accessibility of distribution centers due to issues such as road closures, down wires, or debris, as well as appropriate time of day for dry ice distribution.

Electric ERP revision? Yes

- ERP Section 5.7: Dry Ice

Work Plan: N/A

Deliverables/Milestones: N/A

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 86

Recommendation: All electric utilities consult with county EOCs to develop geographically appropriate locations for dry ice distribution. This includes establishing a list of potential distribution locations before an event.

Timeframe: Medium (< six months)

Company Response: Accept

Status of Recommendation: In Progress

The Customer Operations Officer and Liaison Officer along with the Logistics representatives will consult with the County EOCs and have them identify potential dry ice distribution points. Those locations will be reviewed by the Logistics team to verify that the sites are adequate.

The Company will modify ERP Section 5.7: Dry Ice as follows:
Dry Ice to reflect distribution change as follows, and will be incorporated in the next annual filing:

The Company's Customer Operations Officer and Liaison Officer will confer with local officials and County EOCs to establish distribution sites at the locations previously identified. The Information Officer will publish communications regarding distribution locations, dates, and times. Logistics will estimate the dry ice needs based on the customer count provided (typically each customer receives, on average, five to seven pounds of dry ice, which will maintain food for 18 to 24 hours). The Company's Customer Operations Officer, Liaison Officer and Logistics Chief will review the agreed upon distribution site listings for dry ice every two years with the Local officials and County EOCs.

Electric ERP revision? Will be edited as described above and incorporated into the next annual filing

Work Plan:

- Issue email to County EOCs requesting sites for distribution of dry ice.
- Logistics group to review and confirm listings as suitable locations.
- Finalize locations with County EOCs.
- Review distribution site listings every two years with local and County officials as initiated by Customer Operations Officer, Liaison Officer and Logistics Chief.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Send email notice to County EOCs for distribution locations for dry ice	4/23/19	4/23/19
Current State Analysis		

Awaiting reply from County EOCs	4/23/19	
Review listing received of locations	6/15/19	7/31/19
Design & Implementation		
Agree to locations and notify County EOCs	8/15/19	9/1/19

Summary of Costs: The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 87

Recommendation: All electric utilities develop and implement a transparent process that includes acknowledgement of a claim and sets a reasonable timeframe for reimbursement disposition

Timeframe for Completion: Medium (< six months)

Company Response: Accept

Status of Recommendation: In progress

Key Protocols / Procedures:

- This recommendation is consistent with Orange and Rockland’s tariff, PSC Number 3, leaf #120 – section 10.1 (Continuity of Supply)
- Orange and Rockland will develop a new procedure that outlines the work plan set forth below.

Electric ERP revision? No

Work Plan:

- Orange and Rockland will continue to pay claims consistent with its filed electric tariff, specifically PSC Number 3, Electricity, Leaf #120 – Section 10.1 - Continuity of Supply.
- Customers can file a claim for any reason listed in the tariff by completing and returning a signed form that will be available on Orange and Rockland’s website following the event. The form can be returned to the Company by email, fax, or regular mail.
- Orange and Rockland will acknowledge claims with email, or regular mail if no email is on record or received.
- Reimbursement disposition will be within an average timeframe of 30 days from receipt of the claim and all supporting documents, if necessary.
- Development of automation for email distribution will be required for email, and FAX responses.
- Obtain a P.O. Box for receipt of claims.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
	May 5, 2019	May 30, 2019
Current State Analysis		
	June 1, 2019	June 30,2019

Design & Implementation		
	July 1 , 2019	August 1, 2019

Summary of Costs: Orange and Rockland’s incremental costs for implementing this recommendation should be minimal (*i.e.*, no more than an estimated \$5,000).

Recommendation Number: 88

Recommendation: All electric utilities submit an actionable plan by July 1, 2019, which details future storm hardening measures including a budget, timeline, and major performance benchmarks.

Timeframe for Completion: Long term

Company Response: Accept

Status of Recommendation: In Progress

Following Superstorm Sandy in 2012, the Company identified/adopted certain storm hardening and resiliency techniques to improve both storm/non-storm system performance. Many of these storm hardening approaches and tactics became the new design standard. While this recommendation seeks to identify specific projects to further advance system resiliency, adoption of these post-Sandy methodologies (*e.g.*, minimize double circuit construction, undergrounded circuit exits and path diversity, spacer cable) has already produced real benefits (as described in the Part 105 Report the Company submitted after winter storms Riley and Quinn).

Therefore, as the Company works in conjunction with recommendations like hardening circuit paths to critical infrastructure, the Company's designs are more resilient than they would otherwise have been. Beyond these new design standards, the Company will review existing infrastructure and historical data to target areas where additional investment can further improve storm performance.

Future storm hardening projects in the following areas are currently being evaluated: SH - selective underground of distribution facilities, SH – overhead construction, SH – CSX West shore line transmission replacements, and transmission stabilization. Budgets, project schedules, and measurable performance benchmarks are being developed.

Electric ERP revision? No

Work Plan:

Storm Hardening - Selective Underground Distribution Facilities – The Company will review existing overhead double circuits for historical storm performance and system reliability. The Company will develop a prioritized plan of selected projects to replace overhead facilities with underground design/construction to provide storm hardening benefits.

Storm Hardening - Overhead Construction – The Company will review existing overhead system with historical storm performance issues and reduced system reliability. A prioritized plan of selected projects will be developed to replace standard overhead construction with storm resistant spacer cable design systems.

Storm Hardening - CSX West Shore Line Transmission Structure Replacements

The Company has completed the structural analysis of the wood poles for the transmission lines between the Lovett and West Nyack Substations, adjacent to the CSX West Shore Rail Line, and

identified the poles requiring replacement. Wood poles requiring replacement were evaluated for storm hardening due to their proximity to critical infrastructure and will be replaced with steel poles as an alternative to wood.

Stabilization

Inspections of transmission structures adjacent to lakes, brooks, streams and rivers have identified wood and steel structures that are in need of shoreline stabilization. In order to address persistent erosion the areas surrounding these structures will receive re-grading, fill placement and armoring of the shoreline with an engineered system potentially including shot rock, rip-rap, crushed stone, concrete blocks and filter fabric.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Develop Project Plan & Budget	May 1, 2019	July 1, 2019
Current State Analysis		
Design & Implementation		
Various SH Projects Design & Constructed over next 5 years	January 1, 2020	December 31, 2024

Summary of Costs:

The Company will develop budget costs after identifying the storm hardening projects along with project schedules for each year for the next five years.

Recommendation Number: 93

Recommendation: All electric utilities submit a report to Staff, detailing all efforts that have been made with the towns and/or municipalities to improve public education regarding danger tree removal on private property.

Timeframe for Completion: Medium

Company Response: Accept

Status of Recommendation: In Progress

Presently the following actions are already in progress with regard to fostering public education about Danger Tree removals:

- Meetings with various Municipalities detailing the Danger Tree program presented by Orange and Rockland Community Affairs and the Vegetation Management Group.
- Outreach with community and the public detailing the Danger Tree program presented by Orange and Rockland Community Affairs and Vegetation Management.
- Danger Tree awareness detailed in email sent to customers in selected areas and will be rolled out to additional areas.
- Danger Tree door hanger to be left for customers created and is in process if being printed.
- Danger Tree Program details available on ORU website.
- Communication between ORU Vegetation Management/representatives and local DPW groups detailing the Danger Tree Program.

Electric ERP revision? No

Work Plan: Develop Danger Tree removal Public Education report.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
	N/A	N/A
Current State Analysis		
In progress	N/A	N/A
Design & Implementation		
Develop Danger Tree removal Public Education report...	In-Progress	August 1, 2019

Summary of Costs:

The Company will not incur any incremental costs in implementing this recommendation.

Recommendation Number: 94

Recommendation: All electric utilities immediately begin sharing the list of customers that refuse removal of danger trees with the appropriate municipal officials. These lists should be shared at least on a semi-annual basis.

Timeframe for Completion: Short

Company Response: Accept

Status of Recommendation: In Progress

All Danger Tree locations are captured as well as the approval or refusal of the property owner regarding the removal of the identified Danger Tree, as well as state, municipality, nearest pole number, DBH, height, defect, and other data.

All data is currently available, a report of Danger Tree removal refusals by Municipality can be generated by the tracking system and a report sent to all affected municipalities semi-annual.

Key Constraints:

- Agreement by Municipality to accept Danger Tree removal refusal information for their municipality

Electric ERP revision? No

Work Plan:

- Generate semi-annual report, by Municipality, of all refusals by property owners, to have Danger Trees removed from their property.
- Send report to affected municipalities semi-annually.

Deliverables/Milestones:

Deliverable/Milestone	Start Date	Delivery Date
Planning		
Current State Analysis		
In progress	N/A	N/A
Design & Implementation		
Develop Danger Tree permission refusal report	July 1, 2019	Semi-Annual

Summary of Costs:

Costs for generating report are included in Danger Tree removal costs.