

September 19, 2013

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza,
Albany, New York 12223-1350

**Re: Case 13-E-0140 – Proceeding on Motion of the Commission to Consider Utility
Emergency Performance Metrics**

Dear Secretary Burgess:

In response to the Notice Soliciting Comments issued August 19, 2013 in the above matter, Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the “Joint Utilities”) respectfully submits for filing the attached joint comments.

Thank you for your time and attention.

Respectfully submitted,

Patric R. O'Brien

Patric R. O'Brien

Attachment

cc: Paul A. Colbert
Martin Heslin
Jeffrey A. Rosenbloom

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

PROCEEDING ON MOTION OF THE
COMMISSION TO CONSIDER UTILITY
EMERGENCY PERFORMANCE METRICS

Case No. 13-E-0140

JOINT COMMENTS OF THE NEW YORK STATE UTILITIES

**CENTRAL HUDSON GAS & ELECTRIC CORPORATION,
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.,
NEW YORK STATE ELECTRIC & GAS CORPORATION,
NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID,
ORANGE AND ROCKLAND UTILITIES, INC., AND
ROCHESTER GAS AND ELECTRIC CORPORATION**

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Dated: September 19, 2013

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Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the “Joint Utilities”) submit the following joint comments in response to the Notice Soliciting Comments issued August 19, 2013 in the above matter (the “August Notice”).

BACKGROUND

On April 24, 2013, the New York State Public Service Commission (the “Commission”) issued a Notice Soliciting Comments in the above proceeding (the “April Notice”). The April Notice sought comment on a draft Scorecard developed by Department of Public Service Staff (“Staff”) that would be used to evaluate the performance of the electric utilities following a significant outage. The April Notice also sought comment on five questions related to the Scorecard.

On June 10, 2013, the Joint Utilities filed comments in response to the April Notice (the “June Comments”). While the Joint Utilities were supportive of the Scorecard, the June Comments raised a number of concerns, including that the

measurement criterion for many of the performance measures were unclear, not truly quantitative, and not aligned with the electric emergency plans. The Joint Utilities incorporate the June Comments herein as if they were fully restated.

Thereafter, Staff held several meetings with the Joint Utilities as well as the City of New York, which also submitted comments. On August 19, 2013, the Commission issued a revised Scorecard along with an “Emergency Response Performance Measurement Guide” (the “Guide”) and solicited comments on both documents. The revised Scorecard is divided into three categories, “Preparation,” “Operational Response,” and “Communications.” Each category contains several performance measures, or “Areas of Interest,” with an accompanying “Definition of Measure,” “Measurement Criteria,” and “Points” for each measure. The Guide contains additional information about the performance measures and measurement criterion.

The Joint Utilities continue to support the Commission’s efforts to create a tool to measure the electric utilities’ restoration performance. The Joint Utilities appreciate the efforts of Staff in meeting to discuss the Scorecard and believe that significant improvements have been made to the earlier version. As will be discussed, the Joint Utilities have proposed a number of revisions to the Scorecard and Guide. The overall purpose of these revisions is to further clarify and provide clear, objective, and measurable criterion that can be used by the Commission, Staff, and the Joint Utilities to quantitatively assess performance, consistent with the intent of this proceeding.¹ The Joint Utilities have also proposed modifications to the overall scoring philosophy of the Scorecard.

¹ As stated in the April Notice, “[t]his proceeding was instituted to consider the development of a tool for the quantitative assessment of New York State electric utility performance in restoring power to customers after a significant outage.” April Notice, at 1.

The Joint Utilities note that there is at least one performance measure, “Restoration Times,” that is still undefined. In addition, it is still unclear how the Scorecard will be utilized, including how points under the Scorecard will correspond with a potential penalty. It is also unclear as to how the “Accuracy of Estimated Times of Restoration” measure will be calculated. While the Joint Utilities urge the Commission to adopt the revisions and comments proposed herein, we believe that further meetings with Staff will be beneficial to help further refine the Scorecard and Guide. Adoption of the Joint Utilities’ recommendations by the Commission and further meetings with Staff will help ensure that the measures are appropriate and that all parties have a clear understanding of how the Scorecard, including scoring and the data that will be required, will be utilized.

Section I discusses the Joint Utilities’ proposed revisions to the Scorecard and Guide. Section II discusses the proposed revisions to the overall scoring philosophy.

I. PROPOSED REVISIONS TO THE SCORECARD AND GUIDE

Attachment 1 is a redlined version of the Scorecard and Guide. The revisions were made to:

- Align the performance measures with the Commission-approved electric emergency plans and existing statutory and regulatory requirements, to the greatest extent possible;
- Add quantifiable criterion to measure performance;
- Add clarity; and
- Eliminate subjectivity to make the measures objective and quantitative, consistent with the intent of this proceeding.

It is the Joint Utilities position that the measures and, in particular, the criterion on which performance will be evaluated, should be based on the requirements of the individual utility's Commission-approved electric emergency plan. Substantial time and effort has been invested by the utilities to create emergency plans that are intended to guide the utilities' emergency response. The recently amended Public Service Law requires the electric utilities to follow their emergency plans or be subject to a civil penalty.² In Case 13-E-0198,³ the Commission recently approved the emergency plans of the Joint Utilities subject to certain modifications, emphasizing that "[e]ach utility is expected to carry out restoration efforts in compliance with its emergency plan."⁴

In some instances, however, the Scorecard and Guide contain measures and measurement criterion that do not align with the approved electric emergency plans. For example, the "Event Anticipation" performance measure requires preparation activities to begin following a weather alert. The recently approved plans, however, do not require an alert as the trigger for preparatory activities in response to a potential emergency. Similarly, the criterion for measuring performance under the "LSE Customer Contact" measure would require the Joint Utilities to respond differently under the Scorecard than under the recently approved emergency plans. This creates an anomaly where the Joint Utilities could be in full compliance with their approved emergency plans, which the Commission has stated "will serve as the foundation for enforcement action by the

² New York Public Service Law § 66(21).

³ Case 13-E-0198, In the Matter of 2013 Electric Emergency Plan Review, *Order Approving Electric Emergency Plans* (issued and effective August 16, 2013).

⁴ *Id.* at 2.

Commission,”⁵ but could potentially receive no points under the Scorecard and, therefore, be subject to a penalty.

Accordingly, it is critical that the criterion for each of the performance measures be consistent with the specific requirements contained in the emergency plans. The Commission has stated that the Scorecard “represents an effort to establish standards that will promote effective emergency response.”⁶ The Commission’s goal can only be realized if the utilities are measured based on what is contained in their approved plans. Measuring against a different standard would result in confusion, may hinder critical storm response activities and compromise safety, increase costs to customers, and would conflict with the Public Service Law. Moreover, the Joint Utilities evaluate their own performance based on their approved electric emergency plans. The Scorecard is intended to help the electric utilities measure their performance, as well. Therefore, the requirements of the emergency plans should govern and the measurement criterion must be conformed to those plans.

It is also important that the metrics be clear and the measurement criterion objective and quantifiable. As the August Notice states, this proceeding was instituted to consider the development of a tool “for the quantitative assessment” of the electric utilities.⁷ Accordingly, the Joint Utilities have made revisions to the Scorecard and Guide in Attachment 1 to comport with the Commission’s request for quantitative standards. Specifically, the Joint Utilities have made revisions to the Scorecard and Guide to add detailed criterion that sets forth explicitly what will be required by the electric utilities to satisfy each performance measure. Importantly, the Joint Utilities tied

⁵ *Id.*

⁶ April Notice, at 2.

⁷ August Notice, at 1.

each measurement criterion to the corresponding specific action required in the emergency plans. In this way, each criterion is readily quantifiable, subjectivity is removed, and the inconsistencies inherent in having different requirements in a scorecard from those in the emergency plan are avoided.

Using the “Utility Coordination” performance measure as an example, the criterion in the Guide provides: “Evaluation of compliance will include the review of steps taken to communicate with other utilities, the use and the effectiveness of liaisons, and the ability to integrate concerns raised into restoration activities.” This criterion is subjective rather than quantitative, however, and does not specify how the utilities might satisfy the measure. Therefore, the Joint Utilities revised the criterion to include the specific actions required under their emergency plans to coordinate with utilities. The revised criterion is quantifiable, aligns with the approved emergency plans, and provides all parties with a clear understanding of exactly what is expected and how performance will be assessed. If the Joint Utilities meet these requirements, they receive points under the measure.

In addition, the Joint Utilities have removed subjective assessment language, such as “effective” and “highly effective,” throughout the measurement criterion because this language is contrary to the intent of providing the Commission with a quantitative assessment tool. It is unclear how “effective” and “highly effective” will be measured in a way that does not result in a potential arbitrary application.

In the sections that follow, the Joint Utilities summarize the major revisions made to the Scorecard and Guide. A full list of the revisions, made for the reasons discussed above, is found in Attachment 1. The Joint Utilities submit that the proposed revisions

help the Scorecard to become a more effective, quantitative tool to assess utility performance. Accordingly, the Joint Utilities respectfully request that the revisions be adopted.

Because each utility plans its emergency response and trains its employees based on its approved emergency plan, in the event that the Commission does not adopt the proposals herein and requires the utilities to be measured against metrics that are not aligned with the actions required in the approved plans and are subjective, the Joint Utilities respectfully request that those measures not take effect until the new emergency plan is filed the following year. This will provide the utilities with time to incorporate the new requirements into their emergency plans and train and drill their employees.

A. Preparation Category

Event Anticipation Area of Interest

In the Preparation section of the Scorecard, the Joint Utilities propose revising the definition of the “Event Anticipation” measure to eliminate the reference to an alert from the National Weather Service or private weather service as the trigger for when preparatory activities begin. As discussed above, the change is proposed to align the measure with the requirements of the approved electric emergency plans. Under the plans, an alert may or may not be the trigger for when a utility begins emergency preparation activities. The Joint Utilities receive weather alerts often (*e.g.*, thunderstorms) but such alerts do not necessarily have the potential to interrupt service or require the detailed preparation activities required under the Scorecard. In addition, the definition should reflect that there are certain events that arise with little or no warning

(ex. tornados), and as such, it may not be possible to perform the preparation activities required by the Scorecard.

The Joint Utilities therefore propose eliminating the reference to alert and replacing it with language to clarify that preparation should begin, where practicable, in response to weather forecasts or other indications of circumstances that are likely to result in a storm with an outage duration of three days or more. The proposed change also aligns the definition with the language in page 1 of the Guide, which states that the Scorecard will be applied to an event with an outage duration lasting more than three days.

Employees/Contractors Planning and Press Releases Issued/Text Messages/Emails Sent Measures

In the Guide, the Joint Utilities made edits to the “Press Releases” measure to align the definition to their emergency plans. The Joint Utilities also added new criterion to both measures based on the requirements of the emergency plans. The Joint Utilities submit that this new criterion better provides a quantitative assessment of performance and clarifies exactly what is expected under the Scorecard for these measures.

Municipal Conference Calls Measure

As discussed above, the Joint Utilities propose eliminating the subjective assessments of “highly effective” and “effective.” Performance should be assessed on whether the Joint Utilities complied with the requirements of the measure absent any subjective assessment.

LSE Customer Alerted and Critical Customers Notified Measures

The intent of these two measures appears to require utilities to attempt to provide advanced notice to LSE and critical customers of a potential outage. This is consistent

with the approved emergency plans. However, as drafted, the first sentence creates ambiguity because it appears to require verification of actual contact with these customers. Specifically, the criterion in the Guide for both measures states that utilities “must make contact” with these customers. This would imply follow up contacts and/or field visits to verify that contact was made, which is more appropriate with post-storm notifications, not pre-storm notifications.

Pre-storm notifications are conducted through outbound calls to LSE and critical customers. Text and emails are not used as the Joint Utilities have found that outbound calls are a more effective means of providing advanced notification. These calls target all LSE and critical customers in the affected area to alert them of the storm and the potential for outages. Once the storm has passed, the utilities conduct post-storm notifications, which involve follow-up phone calls and field visits. Because storms sometimes occur on short notice, it would be unrealistic for the utilities to be able to verify that pre-storm contact was made above and beyond the requirement of making outbound calls to potentially impacted customers. Accordingly, the Joint Utilities propose revising these two measures to require utilities to attempt to provide advance notice to potentially impacted LSE and critical customers through the use of outbound calls. The Joint Utilities agree to discuss with Staff the inclusion of text messages/e-mail alerts in future approved electric emergency plans.

Training Measure

The Joint Utilities propose deleting this performance measure. As discussed in the June Comments, training is an ongoing process that is not conducted in association with the specific storm being reviewed. Moreover, the quality and effectiveness of a

utility's training program will shape a company's storm response in most of the areas of interest and will be inherent in the scoring for these areas. Thus, training program compliance, as it impacts preparation, operational response, and communications during the event being assessed, is appropriately captured in the scoring of various measurement criteria assessing event performance and should be deleted. The Joint Utilities are required pursuant to Public Service Law § 105 to submit storm drill training annually. It is the Joint Utilities position that this requirement in the Public Service Law properly captures training requirements and that the measure should be removed from the Scorecard.⁸

Materials/Stockpiles Measure

The Joint Utilities propose revising this measure to require that if critical inventory levels of emergency supplies are below the levels required in the emergency plan, the utilities must, within 24 hours, develop and begin implementation of a plan designed to correct the situation. This change is proposed because there may be circumstances beyond the utilities control where they cannot correct the situation within 24 hours despite best efforts. For example, the utilities could order supplies but the vendor may not deliver them on time. Therefore, the proposed change is more appropriately within the utilities control and should be adopted.

B. Operational Response Category

Down Wires Measure

The Joint Utilities revised this measure to make it consistent with the requirements of the recently amended Public Service Law. Under Public Service Law §

⁸ The Joint Utilities have not redistributed the points for this measure. Should the Commission adopt the proposal, the Joint Utilities recommend discussing with Staff during the proposed meetings how best to redistribute these points.

66(21)(a)(xi), utilities are required to develop plans to secure down wires within 36 hours of notification of their location from a municipal emergency official. The current measurement's requirement of 18 hours is inconsistent with the Public Service Law. In addition, the Joint Utilities disagree that the arrival of a supervisor does not mitigate the down wire situation. To the contrary, a supervisor acts as a wire guard, thereby mitigating the condition.

Damage Assessment Measure

The Joint Utilities added new criterion to assess this measure based on the requirements of the emergency plans and current operational practice. Specifically, the Joint Utilities conduct preliminary damage assessments by designating certain portions of the electric feeder to survey and inspect. The new criterion clarifies that performance will be measured based on what the utility has identified to survey.

Crewing

The Joint Utilities added language to clarify that the measure should not apply to requests for assistance outside of the North Atlantic Mutual Assistance Group or to a National Response Event.

Publication of Estimated Times of Restoration Measure

As explained above, the Joint Utilities propose eliminating the subjective assessment of "exceeds" expectations. The Joint Utilities also propose including definitions for global, regional, and local/municipal estimated times of restoration to provide clarity. Revisions were also made to the Scorecard to align the measurement criterion to the Estimated Time of Restoration Protocol.

Accuracy of Estimated Times of Restoration Measure

The Joint Utilities propose adding that the criterion will be considered satisfied if 90 percent of interrupted customers are restored in accordance with the most recently published estimated times of restoration. This change is proposed to align the measure with the Estimated Time of Restoration Protocol, which states that estimated times of restoration “should be applicable to at least 90 percent of the affected customers in the reported level (global, local, etc.).”⁹ In Case 13-E-0198, the Commission ordered the electric utilities to incorporate the Estimated Time of Restoration Protocol into their revised emergency plans.¹⁰

In addition, while the Joint Utilities agree in concept with this measure, it is still unclear how the data will be used to calculate the measure. The Joint Utilities propose to meet with Staff to discuss how the measurement will be calculated to ensure that all parties have a common understanding of how this measure will work.

Municipal, County EOC, and Utility Coordination Measures

The Joint Utilities submit that the current measurement criterion for these measures is open ended and subjective. Accordingly, the Joint Utilities propose including the specific requirements for municipal, county EOC, and utility coordination from the emergency plans as the measurement criterion. This provides for an objective, quantitative assessment of performance and avoids the potential arbitrary application that could otherwise occur. As stated, for the Scorecard and Guide to be successful, all parties must have a clear understanding of what is expected. The criterion proposed by

⁹ Estimated Time of Restoration Protocol, at 11 (a copy of the Protocol is attached to the August Notice).

¹⁰ Case 13-E-0198, In the Matter of 2013 Electric Emergency Plan Review, *Order Approving Electric Emergency Plans* (issued and effective August 16, 2013), at 15.

the Joint Utilities specifies the requirements necessary to satisfy these measures, thereby achieving the Commission's goal of providing quantitative, objective criterion to assess performance. In addition, the Joint Utilities propose including language to clarify that road clearing involves electric hazards and not, for example, snow or ice removal.

Safety

As drafted, the Scorecard requires that no employees or contractors sustain any type of injury during restoration work. While safety is of the upmost importance to the Joint Utilities, a zero injury rate is highly unrealistic despite the utilities' best efforts. Under the proposed measurement criterion, utilities would receive zero points if there was a single injury, no matter how minor the injury and whether or not the utility was at fault. The Joint Utilities submit that a more realistic rate would be to set the measurement criterion at a level not to exceed two times the individual utility's Operations safety performance record from the prior year. This proposal takes into consideration the conditions present during storm restoration work (*e.g.*, snow and ice) over which the utility has no control. In addition, there is no industry standard for storm related safety statistics. For these reasons, the Joint Utilities submit that their proposal is appropriate and should be adopted. Recognizing the importance of safety, however, the Joint Utilities would like to work with Staff to research and develop a safety measure specific to storm response activities that can be used in the future.

C. Communications Category

Call Answer Rate

The measure states utilities should be able to answer over 80 percent of calls within 90 seconds. If the utilities meet this measure, they receive 20 points. If the

utilities exceed performance, however, they receive 30 points. This point differential is unreasonable. Indeed, more points are awarded for exceeding the measure than for meeting it. The utilities should receive a full score of 50 points for meeting this challenging measure. Additional points should not be awarded for exceeding performance.

Municipal Calls and Customer Communications Measures

Similar to the Municipal, County EOC, and Utility Coordination measures, the Joint Utilities have added quantitative criterion to the Municipal Calls and Customer Communications measures based on the specific actions required in the approved emergency plans. In addition, the Joint Utilities have aligned the definition of the measures to the requirements of the emergency plans.

Web Availability

The Joint Utilities propose modifying this measure to require the availability of the website 23 hours per day. This change is proposed because increased website traffic during outages requires downtime for maintenance. Additionally, the Joint Utilities propose eliminating the need for hourly updates to the website because this is too frequent to provide customer benefits, especially early during an event.

LSE Customers Measure

The Scorecard and Guide require utilities to contact LSE customers within 12 hours from the start of the event. The Joint Utilities propose modifying this measure by eliminating this requirement and instead basing the measurement criterion on the procedures in the individual utility's emergency plans, which contain more robust requirements for contacting LSE customers. The Joint Utilities can contact LSE

customers within 12 hours from the start of the event through the use of outbound calls; however, to the extent that the measure requires utilities to make field visits to customers within 12 hours, the Joint Utilities respectfully submit that such a requirement imposes undue safety risks on the utilities and its employees. Specifically, depending on the timing of the storm, the requirement to contact within 12 hours from the start of the event could result in utility employees being on the road in the middle of treacherous weather conditions. It may also force utility employees to go door to door in the middle of the night to verify contact in hazardous conditions in areas without lights.

The Joint Utilities submit that a more appropriate measurement criterion is to follow the requirements in the emergency plans for post-storm LSE customer notifications. The plans contain a more detailed process for contacting LSE customers than the process contained in the Scorecard and Guide and should be adopted. As drafted, the measurement criterion in the Guide requires only that LSE customers be contacted within 12 hours and that all LSE customers be contacted or referred to an emergency agency within 24 hours. The emergency plans, however, are more robust. Under the plans, the Joint Utilities are required to attempt to contact LSE customers on a daily basis until their power has been restored. If contact cannot be made, the plans require field visits and referrals to emergency services. The Joint Utilities respectfully submit that the detailed procedure for LSE customer notification as contained in the approved emergency plans are the appropriate criterion to use to measure performance under this measure. Accordingly, revisions have been made to align the measure and criterion to the plans. As discussed above, the Scorecard and Guide should not contain

different requirements, as this only results in confusion and could potentially hinder critical response services.

Outgoing Message Measure

The Joint Utilities propose eliminating the requirement that the upfront message contain the same information as the press release. This change is proposed because the information that can be included in the upfront message is limited. The purpose of the upfront message is to provide customers with a general overview of the restoration efforts, whereas press releases are more detailed. Up front messages that contain too much detail will be cumbersome and limit the amount of time it takes for a customer to reach a service representative. Accordingly, it does not make sense for the up front message to contain the same information as a press release. The Joint Utilities also added a definition of the up front message for clarity.

D. Definitions in the Guide and Timing of Data

Outage Duration Definition

In the Guide, the Joint Utilities propose revising the definition of “outage duration” to align it with Part 105. The Guide states that the Scorecard will be applied to any event during which the outage duration lasts more than three days. “Outage duration” is defined as the time period between the start of the event and customer restoration. However, this definition is inconsistent with Part 105, which requires the utilities to file a storm report for events where the restoration period exceeds three days, which is measured based on the time between the start of restoration and the completion of restoration.¹¹ The Joint Utilities submit that the determination of when the Scorecard should apply should be the same as the storm performance report. Specifically, the time

¹¹ 16 NYCRR § 105.4(c).

period should begin to be measured based on the start of restoration and not the start of the event. This definition is consistent with current operational practice and also best supports employee safety, as it takes into account the time when crews can safely proceed. Further, as discussed below, the Joint Utilities are proposing that the data for Scorecard purposes be submitted as an attachment to the storm performance report; therefore, it would make sense that both operate based on the same time periods.

Critical Customer Definition

The Joint Utilities recommend that the definition of “critical customer” be based on the definition contained in the emergency plans. This change is proposed because each of the Joint Utilities has slightly different definitions of “critical customers” in their respective emergency plans. This difference is largely due to the different customers and critical infrastructure in each utility’s respective service territories. The Joint Utilities propose that the definition currently in the Guide be used as a general definition and that the emergency plans be referenced for a specific definition of “critical customer.”

Baseline Information Definition

The Joint Utilities propose deleting the reference to number of crews activated in the definition of “baseline information.” While the Joint Utilities support the concept of requiring certain baseline information in communications, the number of crews activated is not always available or can be inappropriate to share depending on the circumstances. For example, during the preparation phase, crew counts and crew activation numbers change frequently and the Joint Utilities are concerned that communicating changing numbers could result in confusion. There is also a concern that publication of the number

of secured crews early in an event could create an unnecessary competition for resources among utilities once they see other utilities securing crews.

The Joint Utilities have also added “if available” in reference to “baseline information” because during the preparation phase of an event, for example, the utility will not necessarily have information on the number of customers out of service to include in a communication. Therefore, the definition should be based on information that is available.

Submission of Data to Staff

The Guide requires that the utilities submit data to complete the Scorecard within 30 days of the completion of customer restoration. The Joint Utilities submit that this is too ambitious a timeframe and would create an undue burden on the electric utilities. As discussed in the June comments, the same individuals who would be responsible for compiling the data for the Scorecard not only would have just returned from storm work (which, in many cases, involves work around the clock), but are also responsible for post-storm activities, such as restocking, compiling mutual aid and vendor invoices, conducting internal lessons learned reviews, and making permanent repairs to the system. In addition, these individuals are also responsible for putting together the post-storm report required under Part 105. The data for the Scorecard is in many instances the same data required to complete the post-storm report.

Part 105 recognizes that gathering information following a significant outage is time consuming and, therefore, allows 60 days following completion of restoration to file the post-storm report. Submission of the data for the Scorecard should be held to the same timeline. Under the Joint Utilities proposed revision, the data for the Scorecard

would be included as an appendix to the Part 105 storm report. In this way, the Commission and Staff will have both the report and data at the same time.

The Joint Utilities would also like the opportunity to continue discussing with Staff the data that is required to support the particular measures so that there is a clear understanding of what is expected beforehand.

II. PROPOSED REVISIONS TO THE SCORING PHILOSOPHY

In the June comments, the Joint Utilities identified concerns with several aspects of scoring under the Scorecard. The Joint Utilities reiterate those concerns and propose certain modifications to address them.

First, the Joint Utilities do not believe that points should be awarded based on “exceeding” expectations. Staff has developed a Scorecard and Guide that contains requirements for utilities to follow and be judged on. Some of the measures in the Scorecard, however, provide only partial points for meeting performance. The Joint Utilities can only receive the full point total for these measures if it “exceeds” expectations. Specifically, 255 points or more than 25 percent of the available points in the Scorecard are reserved for exceeding performance.¹² Thus, if the utilities meet each of the requirements established in the Scorecard, meaning they complied with their Commission approved emergency plan, they would still fall short of the total 1000 points that could be allocated under the Scorecard. For example, a total of 100 points are available under the “Preparation” category. If the utilities meet expectations, they receive only 85 points. The utilities have to exceed expectations to receive the full 100 points. This is unreasonable.

¹² These measures are evaluation of municipal calls held (15), global (60), regional (60), and local (60) ETR issuance, call answer rates (30) and municipal call information (30).

As explained in the June comments, the Joint Utilities have an obligation to respond appropriately to emergencies. Performance should be measured on whether the Joint Utilities met the measures. As indicated in Section 1 above, “exceeded” expectations or “highly effective” evaluations are subjective assessments that are contrary to the Commission’s intent of creating a quantitative tool to assess utility performance. To the extent a utility exceeds expectations, the achievement is properly considered in the overall assessment of performance.¹³ Because the April Notice indicates that the Scorecard will be used to determine whether a utility should be assessed a civil penalty, it is important that all 1000 points should be allocated based on meeting the performance measures. The results of the Scorecard will likely be made public; therefore, allocating points based on exceeding expectations creates the impression that, even if the utility met each measure, it somehow fell short in its efforts because full points were not awarded. Further, creating a Scorecard that embeds more than 25 percent of its overall scoring on exceeding the requirements of the approved emergency plans could result in unintended consequences, as utilities attempt to meet an artificially high standard, which is inconsistent with their plans and statutory and regulatory requirements.

Second, the Joint Utilities recommend that the point distribution be changed to Preparation (200 points), Operational Response (600 points), and Communications (200 points).¹⁴ Because preparation lays the foundation for a successful storm response, more points should be afforded to this important measure. The Joint Utilities have not

¹³ The Joint Utilities also reiterate their concern that because the Scorecard does not indicate the level at which a penalty may be assessed, it is unknown as to how much the point differential between meeting and exceeding performance relates to the point threshold at which a civil penalty could be assessed.

¹⁴ As currently drafted, the point distribution is Preparation (100 points), Operational Response (600 points), and Communications (300 points).

proposed how to reweight the measures to arrive at the proposed point distribution, but note that points could be redistributed from the measures requiring the utilities to exceed performance. The Joint Utilities recommend that the reweighting of points be discussed as part of the proposed meetings with Staff.

Third, some of the measures provide partial points. The Joint Utilities propose that partial scoring be extended to all the measures, because partial measurement recognizes the complexity inherent in storm restoration efforts and will assist with providing data toward benchmarking performance. The Joint Utilities recommend discussing how best to award partial points for each of the measures in the proposed meetings with Staff.

Fourth, as discussed in the June Comments, the Joint Utilities respectfully submit that the Scorecard results should not be employed to compare the performance of the utilities in response to a specific event. Because systems vary, and the same storm may impact one area of the State more or less severely than another part of the State, the results of the Scorecard should not be used to compare performance, including assessing a penalty against one utility versus another.

Finally, also as discussed in the June Comments, the Joint Utilities submit that the score under the Scorecard should not be the only factor the Commission will consider in deciding whether to commence penalty proceedings and, further, that the score itself should not necessarily dictate a penalty. In addition, the Joint Utilities propose that the Commission provide the opportunity for an evidentiary hearing, consistent with the recently amended Public Service Law, before any penalty is imposed. At the hearing, the utility should have the opportunity to submit evidence disputing any potential penalty.

CONCLUSION

For the foregoing reasons, the Joint Utilities respectfully request that the Commission adopt the proposed revisions to the Scorecard and Guide discussed herein, as well as in the June Comments.

Respectfully submitted,

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Dated: September 19, 2013

ATTACHMENT 1

DRAFT EMERGENCY RESPONSE PERFORMANCE MEASURES

PREPARATION (10% of Total)

Area of Interest	Definition of Measure	Measurement Criteria	Points
1. Event Anticipation	In accordance with the company's approved Electric Emergency Plan, for an event expected to impact the company's service territory, complete steps to provide timely and accurate emergency event preparation, where practicable, in response to NWS or the company's private weather service forecasts or other indication of circumstances that are likely to result in a storm with an Outage Duration of three days or more.	1.1 Employees/Contractors planning	10
		1.2 Press Releases issued / text messages / emails sent	15
		1.3 Municipal Conference Calls held	25
		1.4 LSE customers alerted	10
		1.5 Critical Customers alerted	10
		1.6	10
		1.7 Participation in all pre-event mutual assistance calls	10
		1.8 Verify Materials / Stockpiles level based on forecast. If critical inventory levels are below the required amounts, the company shall, within 24 hours, develop and begin implementation of a plan designed to correct the situation.	20

TOTAL 100

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OPERATIONAL RESPONSE (60% of Total)

Area of Interest	Definition of Measure	Measurement Criteria	Points
2. Down Wires	Response to downed wires reported by Municipal Emergency Official.	< 36 hours	60
3. Preliminary Damage Assessment	Completion of preliminary damage assessment	< 24 hours from start of restoration	30
4. Crewing	80% of the forecast crewing committed to the utility	< 48 hours from the start of restoration	30
5. Estimated Time of Restoration (Made available by utility on web, IVR, to CSR's, etc)	Publication of Global ETR in accordance with <u>ETR Protocol</u>	Event < 48 hrs < 12 hrs	60
		Event < 48 hrs < 36 hrs < 5 days	
		Event > 5 days < 48 hrs	
	Publication of Regional/County ETRs in accordance with <u>ETR Protocol</u>	Event < 48 hrs < 12 hrs for those available	60
		Event < 48 hrs < 36 hrs < 5 days	
		Event > 5 days < 48 hrs	
		< 36 hrs for those Regions/Counties expected to be restored in less than 5 days	
	Publication of Local/ Municipal ETRs in accordance with <u>ETR Protocol</u>	Event < 48 hrs < 18 hrs	60
		Event < 48 hrs < 48 hrs < 5 days	
		Event > 5 days Beyond the first 48 hrs	

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OPERATIONAL RESPONSE (continued)

Area of Interest	Definition of Measure	Measurement Criteria	Points
6. ETR Accuracy	Global ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 24 hours <u>90%</u>	40
	Regional ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 12 hours (3-5 day restoration) <u>90%</u> Accurate within +/- 24 hours (> 5 day restoration) <u>90%</u>	40
	Local ETR accuracy as published in accordance with ETR requirement time	Accurate within +/- 12 hours <u>90%</u>	40
7. Municipality Coordination	Coordination w/ Municipalities regarding <u>electric hazards impeding</u> road clearing, down wires, critical customers, etc.	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	20
8. County EOC Coordination	Coordination with County EOCs	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	20
9. Utility Coordination	Electric Utility Coordination with other Utilities (Electric, gas, communications, water)	Execution of Coordination Protocols pursuant to Commission Approved Emergency Plan	20
10. Safety	Measure of employee or contractor injured doing hazard work during storm/ outage and restoration.	<u>Injury rate not to exceed two times the individual company's Operations safety performance record from the prior year.</u>	100
11. Mutual Assistance	Crew requests made through all sources of mutual assistance	Crew requests made within: 36 hrs (3-5 day restoration) 48 hrs (> 5 day restoration)	20
12. Restoration Times	Time it takes utility to restore power to 90% of customers affected	TBD	---

TOTAL 600

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COMMUNICATION (30% of Total)

Area of Interest	Definition of Measure	Method of Measurement Criteria	Points
13. Call Answer Rates	Customer calls answered by properly staffing call centers	▼	▼
		80% to <90% calls answered within 90 sec.	50
14. Municipal Calls	Municipal call must be properly managed and <u>held in accordance with the company's approved Electric Emergency Plan</u>	▼	▼
		Municipal calls held ▼	30
		Successful implementation of an operator assisted calling system (if required)	10
15. Web Availability	Company's web site must be available <u>23 hours per day or an average availability of 95% through the duration of the event</u> , and must be <u>regularly</u> updated until restoration is complete.	Websites should include the baseline restoration information, all press releases issued during the event, a complete list of safety tips, an outage location map of affected areas, summaries of outages and ETRs by municipality and county, and the locations and times of dry ice distribution.	40
16. LSE Customers	LSE customer contact	<u>LSE customers contacted in accordance with the company's approved Electric Emergency Plan</u>	30
		▼	▼
		100% affected LSE customers contacted or referred to an emergency services agency within 24 hours	20

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Deleted: provide, at minimum, baseline information (outages, ETRs, contact information, etc.), road clearing activities, and allow for Q&A.

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COMMUNICATION (continued)

17. PSC Reporting	Provide storm event information to PSC in accordance with Electric Outage Reporting System (EORS) guideline requirements	All reporting on time, including at a minimum information required by existing EORS guidelines	40
18. Customer Communications	Press releases / text messaging / email / social media	Issue daily messages through the stated communications vehicles for each day of the utility restoration <u>in accordance with the company's approved Electric Emergency Plan</u> ▼	60
19. Outgoing message on telephone line	Recorded message providing callers with outage information is updated within two hours of communication releases.	Message must <u>be updated</u> with <u>in two hours of press</u> releases	20
20. PSC Complaints	Number of storm/outage related PSC complaints received	≤ 20 per 100,000 customers affected	20
		≤ 40 per 100,000 customers affected	10

TOTAL 300

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Emergency Response Performance Measurement Guide

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

This scorecard will be applied to any event during which the outage duration, as defined below, lasts more than three days. The Commission may require the scorecard to be applied to assess company performance for other events in which the Commission determines to be necessary.

The scorecard has been divided into three categories:

- | | |
|-------------------------|------------|
| 1. Preparation | 200 points |
| 2. Operational Response | 600 points |
| 3. Communication | 200 points |

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Maximum Available Points 1000

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

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COMMON DEFINITIONS:

Start of Event – The time when more than 5,000 customers are interrupted within a division for more than 30 minutes or more than 20,000 customers are interrupted companywide for more than 30 minutes. If the event affects less than the customer counts listed, the start time shall be the earlier of the peak level of interruptions or start of utility restoration.

Customer Restoration – For the purposes of the scorecard, customer restoration will be considered complete when for each customer service has been restored or service is available but would be unsafe to restore due to damage with customer-owned equipment or a compromised structure (e.g., condemned).

Outage Duration – The time period between the start of utility restoration and the completion of customer restoration for all customers affected by the storm.

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Start of Utility Restoration – The start of utility restoration will be considered the point in time when field personnel are able to be dispatched without unacceptable safety risks from continued severe weather conditions (where adverse weather conditions are applicable) and when the potential additional damage to the electric system from the storm would be low in proportion to the expected level of damage already sustained. The start of the restoration period may be

different for distinct areas where the effect of a storm limits access to facilities (e.g., severe flooding).

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

Life Support Equipment Customers (LSE customer) – A customer who had documented their need for essential electricity for medical needs (i.e., a customer or a resident of the customer's premises who suffers from a medical condition requiring utility service to operate a life-sustaining device with certification by a medical doctor or qualified official of a local board of health). Every utility shall maintain a special file on such residential customers and an appropriate identification on the meters of such customers.

Critical Customer – Critical customer shall be defined as in the company's Electric Emergency Plans. In general, a critical customer is a customer that provides critical care and/or services that are needed in times of emergency, including hospitals, police, and fire departments.

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Baseline Information – The following list of information to be included in communications (if available): safety tips associated with downed wires, geographic areas impacted, number of customers out of service, how to report an outage and check for outage status, estimated times of restoration per operational guidelines, and means available to contact the company (phone, web, e-mail, social media, text messaging, etc.).

Deleted: number of crews activated,

Electric Outage Reporting System (EORS) – EORS is a mapping and reporting system that allows DPS Staff to receive, process, analyze, and report outage data quickly and in a uniform format. EORS is used to process data automatically submitted by utility companies and generate a range of maps illustrating the geographical extent of impact and customer outages outage by municipality, county, and company boundaries. The system can also estimate the affected population for each outage level.

PREPARATION

The preparation measures are intended to score utility performance with respect to activities and communications performed in accordance with the company's approved Electric Emergency Plan, prior to forecasted storms and in response to National Weather Service or a utility's private weather service forecasts or other indication of circumstances that are likely to result in a storm with an Outage Duration of three days or more. For events with limited warnings, thereby making certain measures impractical to implement, as deemed by DPS, the 200 points for those measures will be evenly distributed among the remaining measures.

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EMPLOYEE CONTRACTOR PLANNING

Measure: Appropriate planning for Employees/Contractors

Definition: Evaluation of compliance will include the review of steps taken to comply with emergency plans and communicate with employees/contractors regarding activation, including storm duty assignments and mobilization requirements.

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Criterion: 1. Internal communication notifying employees of pending activation.

2. Storm Response Organizations properly staffed per the company's approved Electric Emergency Plan.

3. Contractors notified of their need for service.

PRESS RELEASES/TEXT MESSAGING/EMAIL/SOCIAL MEDIA

Measure: Pre-storm communications through Press Releases, Text Messaging, E-Mail, and Social Media

Definition: Companies are to issue pre-storm messages through the stated communications vehicles to alert customers of the potential for loss of service in accordance with the company's approved Electric Emergency Plan. Text messages and/or emails should be issued to all customers for whom company has customer addresses on file. Evaluation of compliance will include a review of the information contained in press releases, emails, text messages and the use of Facebook, Twitter, and other means of social media during the restoration. Contents of the communications should include the type and severity of the storm, the affect it may have on the utility, action being taken to prepare for the event, and available methods to contact the company (phone, web, e-mail, social media, text messaging, etc.). It will be acceptable to provide a link to such information on the company's website to manage character limit restrictions.

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Criterion: 1. Press release issued consistent with the requirements of the company's approved Electric Emergency Plan.

2. Website updated with pre-event information.

3. Social media incorporated in communications.

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MUNICIPAL CONFERENCE CALL

Measure: Pre-storm call held.

Criterion: Municipal call will be held prior to the storm and provide information relating to the type and anticipated severity of the storm, the affect it may have on the utility and expected level of system damage, activities being taken to prepare for the event, and processes for communicating with companies throughout the event. ▼

Deleted: and determined to be highly effective or effective

Deleted: To determine call effectiveness, consideration will be given to whether the time of the municipal call was communicated to all stakeholders, whether the previously stated information was communicated, how the call was managed, and whether the call allowed for sufficient Q&A and how the Company responded to questions posed.¶

LSE CUSTOMERS ALERTED

Measure: All LSE customers alerted

Criterion: Utilities shall make an outbound call in an attempt to provide advance notice to potentially impacted customers who the utility knows are LSE customers prior to the expected onset of an outage event. ▼

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Deleted: The alerts are to be made by phone and by text messages/emails for those critical customers who have provided contact information.

CRITICAL CUSTOMERS ALERTED

Measure: All critical customers alerted

Criterion: Utilities shall make an outbound call in an attempt to provide advance notice to potentially impacted critical customers prior to the onset of an outage event. ▼

Deleted: TRAINING¶

Measure: Compliance with training program as specified in approved emergency plans.¶

Criterion: All personnel identified for use during the utility restoration must be trained in accordance with the guidelines specified within the Company's emergency plan. Training provided prior to dispatch will qualify provided it meets the normal course curriculum.¶

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Deleted: whether storm stocking levels exist based on forecasted level.

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MUTUAL ASSISTANCE CALLS

Measure: Participate in all pre-event mutual assistance calls

Criterion: Utilities are required to have at least one employee participate in all pre-event mutual assistance calls.

MATERIALS/STOCKPILES

Measure: Maintain critical inventory levels of emergency supplies according to the requirements of the company's approved Electric Emergency Plan.

Criterion: Companies must verify critical inventory levels of emergency supplies. If critical inventory levels are below the required amounts, the company shall, within 24 hours, develop and begin implementation of a plan designed to correct the situation.

OPERATIONAL RESPONSE

The operational response measures are intended to score utility performance with respect to its response and ability to effectively mobilize personnel. ETRs furnished by utilities should be appropriate to the distribution of the communication vehicle; e.g., ETRs in press releases should reflect the area where press release is distributed, ETRs on municipal calls should be appropriate to the area where municipal call is held.

Deleted: Accurate and timely Estimated Time of Restoration (ETRs) continues to be an area in which the utilities need to improve.

DOWN WIRES

Measure: Response to downed wires that are reported by municipal emergency officials within 36 hours.

Definition: For the purpose of this measure, municipal emergency officials will be defined as members of the 911 call center, police, fire, and office of emergency management (including Emergency Operations Center personnel). Response time will be measured from when the call is taken by the utility until time it takes the utility to arrive at the location with the intent to fix, make-safe, or stand by a downed wire. In the event the call is taken before utility restoration has commenced, the start time shall be equivalent to start of the utility restoration.

Criterion: Take appropriate safety precautions regarding electrical hazards, including plans to promptly secure downed wires within 36 hours of notification of the location of such downed wires from a municipal emergency official.

Deleted: less than 18 hours for events with 3 to 5 days customer restoration or less or in less than

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Deleted: for events with customer restoration over 5 days

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Deleted: Arrival of a supervisor or other personnel to assess the location does not meet these criteria unless the down wire is identified as a telecommunications, cable, or other non-utility owned equipment.

DAMAGE ASSESSMENT

Measure: Completion of preliminary damage assessment within 24 hours of the start of utility restoration

Definition: For the purpose of the scorecard, preliminary damage assessment will be an initial assessment of mainline circuits considered to be heavily impacted based on SCADA readings and/or OMS predictions as well as circuits serving critical infrastructure known to be without commercial power. Evaluation will be based on the ability to mobilize and deploy assessors effectively and record findings in a manner that allows for the development of work packages and ETRs.

Criterion: The utility may only designate certain circuits to be assessed. Therefore, the measurement of this metric will be based on what the utility has identified for assessment and whether or not the assessment was performed in accordance with the company's approved Electric Emergency Plan.

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CREWING

Measure: 80% of the forecast crewing committed to the utility within 48 hours from the start of restoration.

Criterion: For the purpose of this measurement a committed crew will be considered to be a utility, contractor, or mutual assistance crew on property or en route. Utilities will not be penalized for acquiring additional resources to assist the restoration as they are released by other utilities.

This metric does not apply to requests for assistance outside of the utilities that comprise the North Atlantic Mutual Assistance Group or to a National Response Event. A National Response Event is defined as an event that impacts a significant population and requires resources from multiple RMAGs or sources, requires resources that exceed the capacity of the impacted and adjacent regions in terms of level and capability, and/or requires coordination of federal, state, and local response.

PUBLICATION OF ESTIMATED TIMES OF RESTORATION

Measure: Publication of ETRs in accordance with the ETR Protocol.

Deleted: guidelines.

Definition: Global ETR – relating to or involving the entire area affected by the event with the same start of restoration time.

Regional/County ETR – An administrative area; typically, a sub-set of the entire area affected by the event. Either an aggregate of multiple counties or a single county.

Local/Municipal ETR – Of or relating to a city or town or particular area within the Region or County affected by the event.

Criterion: Time periods for evaluation will be measured from the utility restoration start time. ▼

Deleted: Publication of ETRs in advance of guideline expectations will be awarded additional points.

ACCURACY OF ESTIMATED TIMES OF RESTORATION

Measure: Accuracy of ETRs published in accordance with the ETR Protocol.

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Criterion: Accuracy of ETR will be determined based on the ETRs published closest to the expectation contained in the guidelines. For regional/county ETRs, an evaluation will be made for each region/county affected by the event and points will be awarded on a pro-rated basis (e.g. if five ETRs are issued and four are within a timeband, the utility will score 4/5 of the available points).

The criterion will be considered satisfied if 90 percent of interrupted customers are restored in accordance with the most recently published ETR.

MUNICIPAL COORDINATION

Measure: Coordinate with municipalities regarding electric hazards that are impeding road clearing, down wires, critical customers, etc. in accordance with approved emergency plans.

Definition: ▼

Municipal coordination shall consist of the designation of a dedicated contact (liaison) to the municipality. The contact may sit physically in the municipal EOC or be available through direct communication (i.e., telephone or email). Coordination may or may not result in the utility needing to reprioritize repairs.

Criterion: 1. Company designee assigned as a dedicated contact (liaison) to the municipality in accordance with the company's approved Electric Emergency Plan.

2. Company designee (liaison) is physically present in the municipal EOC or is available through direct communication (i.e., telephone or email).

Deleted: Criterion

Deleted: Evaluation of compliance will include the review of steps taken to communicate with municipalities, the use and the effectiveness of liaisons, and the ability to integrate concerns raised into restoration activities.

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COUNTY EOC COORDINATION

Measure: Coordinate with County EOCs regarding electric hazards that are impeding road clearing, down wires, critical customers, etc. in accordance with approved emergency plans.

Definition: ▼

County EOC coordination shall consist of the designation of a dedicated contact (liaison) to the county. The contact may sit physically in the county EOC or be available through direct communication (i.e., telephone or email). Coordination may or may not result in the utility needing to reprioritize repairs.

Criterion: 1. Company designee assigned as a dedicated contact (liaison) to the county in accordance with the company's approved Electric Emergency Plan.

2. Company designee (liaison) is physically present in the county EOC or is available through direct communication (i.e., telephone or email).

Deleted: Criterion

Deleted: Evaluation of compliance will include the review of steps taken to communicate with county emergency operation centers, the use and the effectiveness of liaisons, and the ability to integrate concerns raised into restoration activities.¹

UTILITY COORDINATION

Measure: Coordinate with other utilities (electric, gas, communications, water) regarding critical infrastructure and efficient restoration in accordance with approved emergency plans.

Definition:

Acceptable utility coordination shall consist of telephone communication, co-locating at an EOC, field meeting, or the assignment of other utility representatives to the company restoration center.

If a County or Municipal EOC is open and staffed, the preferred method of coordination shall take place at the County or Municipal EOC. Coordination activities shall consist of an exchange of critical facility information, restoration priorities, outage locations, and telecommunication generator locations. Coordination may or may not result in the utility needing to re-prioritize repairs.

Criterion: Completion of one or more of the following shall satisfy this measure:

1. Provide direct telephone number to other utilities for coordination purposes.
2. Co-locate/coordinate priorities at the County/Municipal EOC when opened.
3. Field meeting to coordination restoration priorities.
4. Provide opportunity for other utility to staff company emergency restoration center.

Deleted: Criterion

Deleted: Evaluation of compliance will include the review of steps taken to communicate with other utilities, the use and the effectiveness of liaisons, and the ability to integrate concerns raised into restoration activities.¹

SAFETY

Measure: Avoidance of employee or contactor injury occurring during hazard storm/outage and restoration work.

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Criterion: For the scorecard purpose, hazard work is defined as any assignments that are directly related with restoration activities.

The criterion for this measure will be an injury rate not to exceed two times the individual company's Operations safety performance record from the prior year.

MUTUAL ASSISTANCE

Measure: Request made through all sources of mutual assistance within 36 hours from the start of utility restoration for 3 to 5 day events and 48 hours from the start of utility restoration for events over 5 days.

Criterion: Evaluation of compliance will include the review of mutual assistance request related to line workers, vegetation workers, damage assessors, wire guards in comparison to peak work levels and emergency plan requirements.

RESTORATION TIMES

Measure: Time it takes utility to restore power to 90% of customers affected

Criterion: Measurement criteria is still being determined

The Joint Utilities recommend working in collaboration with Staff to define this measure and establish quantifiable measurement criterion.

COMMUNICATIONS

The communications measures are intended to score utility performance with respect to its ability to receive and disseminate information related to the impact of the storm/outage and restoration activities. The need for communicating with customers, general public, news media and local officials is very important during emergency conditions, such as storms. Therefore, the sharing of information will be measured with respect to several communication vehicles (calls, press releases, social media, etc.). During an extended power outage, it is important that timely and accurate information be provided as widely as possible. Periodic reports, whether through press releases, e-mails, text messages or on social media websites should be accurate and timely, and avoid misleading the public with optimistic or unrealistic statements.

CALL ANSWER RATES

Measure: Percent of customer calls answered within 90 seconds.

Criterion: By properly staffing call centers, utilities should be able to answer over 80 percent of calls within 90 seconds. ▼ The call answer time will be measured on a daily basis from the start of the event through customer restoration. Performance points will be issued on a pro-rated basis.

Deleted: Additional points will be given if the call answer rate is over 90 percent.

MUNICIPAL CALLS

Measure: Municipal (or Community Leader) calls are held daily in compliance with the company's approved Electric Emergency Plans.

Deleted: and determined to be highly effective or effective.

Definition: Municipal calls should be held daily until 90% of the affected customers have been restored. An alternative municipal contact method should be in place to respond to questions and issues from officials regarding the remaining scattered single outages once the calls are no longer required. The first municipal call can be held at the utilities discretion but must be held within the first 36 hours from the start of the utility restoration. ▼

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Criterion: Municipal calls will be held in compliance with the company's approved Electric Emergency Plan. The call will provide summary level information relating to the progress of restoration to key stakeholders, community leaders, and invited participants. To satisfy this measure, the following topics shall be reviewed on the call:

Deleted: To determine call effectiveness, consideration will be given to whether the time of the municipal call was communicated to all stakeholders, how the call was managed, if baseline information and status of road clearing activities were provided, whether the call allowed for sufficient Q&A and how the Company responded to questions posed, and the successful use of an operator assisted calling system to assist in managing the call.

1. Number of customers affected by peak of event

2. Number of customers restored

3. Number of customers that remain without service

4. ETR information that is available consistent with ETR Protocol

5. Number of crews being utilized including mutual assistance, contractor, service crews, surveyors, etc.
6. Areas where crews are working
7. Areas where crews will be sent next
8. Type and extent of damage found, pole down, wire down, worst locations, etc.
9. Weather update and impact of weather on restoration
10. Known open shelter locations

Additional points will be awarded for the successful implementation of an operator assisted calling system to assist in managing the call, if such a system is required. If not, those points will be reallocated to this measure.

WEB AVAILABILITY

Measure: Websites are accessible, remain available 23 hours per day or 95 percent of the time through the duration of the event, and contain appropriate storm related information

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Criterion: During a storm event, utilities' websites must be available 23 hours per day or an average availability of 95% through the duration of the event, and must be regularly updated, until restoration is complete. The websites should include the baseline restoration information, all press releases issued during the event, a complete list of safety tips, an outage location map of affected areas, summaries of outages and ETRs by municipality and county, and the locations and times of dry ice distribution.

Deleted: around the clock,

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LSE CUSTOMERS

Measure: LSE customers contacted in accordance with the company's approved Electric Emergency Plan,

Deleted: Percent of affected

Criterion: ▼

Using the start of restoration as the initial reference point

1. The company shall attempt to contact LSE customers affected by the emergency on a daily basis until their electrical power has been completely restored. The objective is to inform them of the scope of the interruption and the restoration forecast.

2. If the LSE customer cannot be reached, attempt to call a 3rd party contact, if information is available.

3. An unsuccessful contact list will be generated every 24 hours identifying those LSE customers that could not be reached.

Deleted: within 12 hours, if at least two attempts were made within 12 hours for those unable to be contacted, and whether all of the affected LSE customers were contacted or referred to an emergency service agency within 24 hours.

Deleted: Utilities will be evaluated on their ability to contact 80% of the affected LSE customers within 12 hours from the start of the event and whether 100% of the affected LSE customers contacted or referred to an emergency service agency was done within 24 hours. Utilities must make at least one additional attempt, within the same 12 hour period, to contact any LSE customer who was not contacted on the first attempt.

4. The company shall coordinate with local emergency services to check on the welfare of the LSE customer who could not be reached and report back as to the status.

Partial scoring will be awarded for the initial attempt, provided all customers had received at least one phone call. Within 24 hours of the start of the event, LSE customers must have been either (a) directly contacted by the utility, or (b) referred to an emergency services agency (e.g., police or fire department) for emergency assistance. Utilities must maintain records of LSE customer contacts, including any customers who the utility was unable to reach.

PSC REPORTING

Measure: Reports to the PSC are complete and submitted on time.

Criterion: Evaluation will consist of a review and the content of reports provided to staff and outage submissions. Reports are due from each utility to DPS by 7am, 11am, 3pm, and 7pm or as defined by Staff.² Based on the specific conditions of the event and the number of electric customer outages remaining, DPS Staff will notify each utility when reporting is no longer necessary. The reports should include, at a minimum, summary of outages, crewing information on site and en-route, planned crew relocation and mutual assistance activity, discussion of major damage, estimated restoration times, summaries of work plans for restoring customers, listing of critical and LSE customers affected, and a summary of dry ice/bottled water distribution activities.

Customer Communications

Measure: Daily communications through Press Releases, Text Messaging, E-Mail, and Social Media

Criterion: Companies are required to issue daily messages through the stated communications vehicles for each day of the utility restoration in accordance with the company's approved Electric Emergency Plan. Text messages and/or emails should be issued daily to all customers for whom company has customer addresses on file. Evaluation of compliance will include a review of the information contained in press releases, emails, text messages and the use of Facebook, Twitter, and other forms of social media, as applicable, during the restoration. Contents of the communications, at a minimum, should include the following information whenever possible and the character limitations of some communication vehicles will be taken into account when reviewed for content.

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1. Safety tips associated with down wires

² The utilities are reminded that additional reporting may be requested based on the severity of the event.

2. Geographic areas impacted by the emergency

3. How to report an outage and check for outage status

4. ETRs per operational guidelines

5. Means available to contact the company (phone, web, e-mail, social media, text messaging, etc.)

OUTGOING MESSAGE

Measure: Outgoing messages on telephone line must be updated within two hours following communication releases

Definition: The outgoing message is the “up front” message that customers hear when they call the Company prior to reaching a customer service representative.

Criterion: Evaluation for compliance will be determined based on whether the outgoing messages were updated within two hours following a press release.

Deleted: communication

Deleted: and the new message coincides with information contained in the releases

PSC COMPLAINTS

Measure: Number of storm/outage related PSC complaints received per 100,000 customers affected.

Criterion: Data from the Department's call center will be evaluated to determine the number of storm/outage related complaints received. Storm related complaints will also reflect complaint related to improper application of customer protection measures defined under Case 13-M-0061.