



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 10-02-A

April 20, 2010

Investigation by the Department of Public Utilities on its own Motion to Establish Guidelines for Electric Companies' Emergency Response Plans.

ORDER ON FINAL EMERGENCY RESPONSE PLAN GUIDELINES FOR ELECTRIC COMPANIES

I. INTRODUCTION

On February 16, 2010, the Department of Public Utilities (“Department”) issued an Order opening an investigation to establish guidelines for emergency response plans (“ERPs”) for electric distribution and transmission companies (“Companies”),¹ which included a proposed set of ERP Guidelines (“Guidelines”).² ERPs are to be designed for the safe and reasonably prompt restoration of service associated with an Emergency Event. G.L. c. 164, § 85B; 220 C.M.R. § 19.04(1). Pursuant to G.L. c. 164, § 85B, Companies are required to submit an ERP by May 15 each year to the Department for review and approval.³ 220 C.M.R. § 19.04(3). The purpose of the ERP Guidelines is to provide, to the extent possible, uniform content and formatting requirements for the Companies. See ERP Guidelines, D.P.U. 10-02, at 1 (2010).

II. BACKGROUND

On November 12, 2009, Governor Patrick signed into law St. 2009, c. 133, An Act Relative to Public Utility Companies (“2009 Act”). Among other provisions, the 2009 Act amends G.L. c. 164 by adding two new sections, §§ 1J and 85B. Section 1J requires the

¹ The four investor-owned electric companies doing business in the Commonwealth are Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, NSTAR Electric Company, Fitchburg Gas and Electric Light Company d/b/a Unitil, and Western Massachusetts Electric Company.

² The Guidelines do not apply to gas companies, which are subject to a comprehensive system of existing federal and state requirements and guidelines for handling outages and Emergency Events. See 49 U.S.C. §§ 60101- 60125; 49 C.F.R. Part 192; G.L. c. 164, § 105A; 220 C.M.R. § 69.00 and 220 C.M.R. §§ 100.00 through 113.00.

³ Each Company currently has an ERP in place. Once these Guidelines are finalized, Companies will be required to file ERPs that are consistent with the Guidelines.

Department to promulgate rules and regulations to establish standards of acceptable performance for emergency preparation and restoration of service for electric and gas companies doing business in the Commonwealth. Section 85B requires that electric distribution, transmission and natural gas companies submit annually an ERP for review and approval by the Department.

On February 2, 2010, the Department issued Emergency Preparation and Restoration of Service Regulations, D.P.U. 10-01, an Order adopting emergency regulations 220 C.M.R. § 19.00: Standards of Performance for Emergency Preparation and Restoration of Service for Electric Distribution and Gas Companies. After receiving comments and holding a public hearing, the Department revised the regulations and issued an Order adopting final regulations on April 16, 2010. D.P.U. 10-01-A (2010).⁴ The regulations create standards that require Companies to ensure that they (1) are adequately and sufficiently prepared to restore service to their customers, and (2) restore service in a safe and reasonably prompt manner during all Service Interruptions and outages. 220 C.M.R. § 19.03. As part of the standards, Companies are required to implement all applicable components of their ERPs for preparation for and restoration of service during Emergency Events. Id. The regulations also establish minimum requirements for the ERPs, based on G.L. c. 164, § 85B. 220 C.M.R. § 19.04.

In the Order opening this investigation, the Department strongly encouraged the Companies to work together to provide joint comments and proposed revisions to the

⁴ The final regulations were submitted to the Secretary of the Commonwealth for publication in the Massachusetts Register on April 30, 2010, at which time they will go into effect.

Guidelines in order to create ERPs that are as consistent as possible across all Companies.

D.P.U. 10-02, at 3. The Department received joint initial comments on the Guidelines on March 3, 2010 from the Companies (“Initial Comments”). On March 8 and 10, 2010, the Department held two technical sessions during which the Department, the Companies, the Attorney General and the Department of Energy Resources discussed the Guidelines. Based on the discussion at the technical sessions, the Companies submitted a joint set of reply comments on March 22, 2010 (“Reply Comments”), which included a red-lined version of the Guidelines.

III. CHANGES TO THE PROPOSED GUIDELINES

During the technical sessions, the Department and the participants responded to questions raised by the Guidelines and the Initial Comments, and clarified their respective concerns about the ERPs and their implementation. The Reply Comments reflect those discussions. Thus, the Department will focus here on the Reply Comments, in which the Companies raise three main concerns and make several minor recommendations.

The Companies’ central concern is that the Guidelines require ERPs to apply to preparation for and restoration of service associated with all outages, instead of applying only to Emergency Events (Reply Comments at 3-5).⁵ The Companies also raised this concern with regard to the emergency regulations. In the final regulations, the Department explicitly

⁵ To maintain consistency among these Guidelines, the Department’s regulations, and Service Quality Guidelines, the Department has added the term “Service Interruption” to the Guidelines to make it clear that the Guidelines apply to loss of service to customers, not solely equipment breakdowns. See 220 C.M.R. § 19.02; see also Service Quality Guidelines, D.P.U. 04-116-C Appendix at 3, 5 (2007).

defined an ERP as a plan that prepares a company to respond to an Emergency Event.

220 C.M.R. § 19.02. In addition, the Department refined the focus of the preparation standard established in the regulations from *outage* preparation to *emergency* preparation, and clarified that Companies are only required to implement their ERPs for Emergency Events.⁶

D.P.U. 10-01-A at 4-5 (April 16, 2010). The regulations form the basis for the Final Guidelines and therefore, these changes, among others, are reflected in the Final Guidelines as well.

The other two main concerns raised by the Companies address the mechanics of implementing the ERPs. One concern is that, while uniformity among the Companies' ERPs has certain benefits, the Department should not require uniformity across the industry at the expense of operational uniformity within a multi-jurisdictional company (Reply Comments at 2, 5-6). The other main concern is that the Guidelines' reporting requirements related to restoration activities and conditions should not be so onerous as to impede the actual restoration activities (Reply Comments at 2, 5-6). The Department has made changes to the Guidelines to accommodate the Companies' general concerns while still preserving the Department's ability to assess the adequacy of the Companies' emergency preparation and restoration of service performance and to have timely access to information. Specifically, the Department has amended the Guidelines to allow for differences in the Companies' operational

⁶ The Department did not change the restoration of service standard in the regulations and thus, that standard applies to restoration of service during all Service Interruptions and outages, including Emergency Events. D.P.U. 10-01-A at 4-5 (April 16, 2010).

structures and has changed the frequency of some of the reporting requirements. See, e.g., Final ERP Guidelines, § VII.B.2.

Among the other less significant changes recommended by the Companies, the Companies expressed concern about their role as defined in the Guidelines in assisting Life Support Customers (“LSCs”) and other customers with limitations (Reply Comments at 10-12). The Companies state that they are not equipped to do more than warn the self-identified LSCs of the potential of an imminent Emergency Event and to direct them and other customers with limitations to seek assistance from public safety officials and human services agencies (id. at 10-11). The Department has addressed this concern in the Final Guidelines by acknowledging that the appropriate role for the Companies is to refer LSCs to such external resources. Final ERP Guidelines, § V.E.4. In addition, the Companies express concern about the requirement that they conduct table-top exercises to prepare for non-storm emergencies, such as loss of business continuity, that are not likely to cause or be related to widespread outages (Reply Comments at 11-12). The Department has revised the Guidelines to require table-top exercises that prepare the Companies for other types of emergencies, like loss of business continuity, if they were to occur concurrently with an Emergency Event that resulted in widespread outages or Service Interruptions. Final ERP Guidelines, § VI.C2. Finally, when revising the Guidelines, the Department took into account the other technical recommendations made by the Companies.

IV. CONCLUSION

Accordingly, the Department adopts the Final Emergency Response Plan Guidelines for Electric Companies attached to this Order. In accordance with G.L. c. 164, § 85B, 220 C.M.R. § 19.04, and this Order, the Companies are required to file ERPs consistent with these Guidelines, as amended from time to time, by May 15 each year for Department review and approval.

FINAL EMERGENCY RESPONSE PLAN
GUIDELINES FOR ELECTRIC COMPANIES

OUTLINE OF GUIDELINES

- I. Purpose
- II. Definitions
- III. Event Classification
- IV. Incident Command System
- V. Key Functions
- VI. Advance Planning and Training
- VII. Reporting Requirements
- VIII. Filing of Emergency Response Plan
- IX. Attachments

I. PURPOSE

The purpose of Emergency Response Plans (“ERPs”) is to ensure that each electric company is adequately and sufficiently prepared to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. 220 C.M.R. § 19.00 et seq. The purpose of these Guidelines is to establish, to the extent reasonable, uniform content and formatting requirements by which each electric company shall structure its ERP, consistent with the requirements of G.L. c. 164, § 85B and 220 C.M.R. § 19.00 et seq.

II. DEFINITIONS

Department refers to the Department of Public Utilities, Commonwealth of Massachusetts.

Emergency Event means an event where widespread outages or Service Interruptions have occurred in the service area of a Company due to storms or other causes beyond the control of a Company. An Emergency Event is an event classified as a Level III, IV or V event in a Company’s ERP.

Company refers to an investor-owned electric distribution or transmission company conducting business in the Commonwealth.

Emergency Operations Center (“EOC”) means the physical location at which the coordination of information and resources to support incident management activities takes place.

Incident Commander (“IC”) means the individual appointed by each Company’s senior executive management who has overall responsibility for the Company’s response in an Emergency Event.

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Incident Command System (“ICS”) refers to the coordinated and collaborative incident management construct specifically designed and made a part of the National Incident Management System (“NIMS”) under the Federal Emergency Management Agency. ICS enables effective, efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure, designed to aid in the management of resources during incidents.

Life Support Customers (“LSCs”), also known as medical priority customers, means those customers who have provided documentation to the electric distribution Company of their medical conditions necessitating electric service.

Mutual Assistance Agreement means an agreement among a Company and other utilities, both inside and outside the state, that details specifics for obtaining or lending resources, including, but not limited to, material, equipment, and trained personnel, when internal resources are not sufficient to ensure the safe and reasonably prompt restoration of service during an Emergency Event.

Pre-Event Stage means the period of time between when (1) a Company first identifies an impending Emergency Event, and (2) the Emergency Event first causes damage to the system resulting in Service Interruptions.

Post-Event Stage means the period of time immediately following restoration of service to all customers after an Emergency Event.

Service Interruption means the loss of service to one or more customers connected to an electric distribution company’s distribution system.

Service Restoration Stage means the period of time between when an Emergency Event first causes damage to the system (resulting in Service Interruptions), and the time when service is restored to all customers.

Sub-Commander means the individual placed in charge of a region, division, area, district or other operational subdivision with responsibility to direct the Company’s emergency response within a defined geographic area.

III. EVENT CLASSIFICATION

Each Company shall classify its Service Interruption or outage events in its ERP as a Level I through V event, according to historical data on the severity of damage experienced by the Company during past events. As summarized in Table 1, each Company’s ERP shall describe the general characteristics and/or expected impact, based on historical data, typically associated

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with each level of event and identify: (1) the number of trouble locations typically experienced; (2) the number and type of crews typically required to respond, and whether external resources typically are required; and (3) the number of times in a year that the level of event would typically occur. Where appropriate, the Company may include in its event classification a range of values, rather than a single value.

TABLE 1

LEVEL	EVENT CHARACTERISTICS	EXPECTED % OF CUSTOMERS WITHOUT SERVICE	EXPECTED # OF TROUBLE LOCATIONS	EXPECTED # & TYPE OF CREWS REQUIRED	TYPICAL DURATION	TYPICAL EVENT FREQUENCY
I	Small Impact Event	< 2% of customers			< 12 hours	
II	Moderate Impact Event	2 - <5.0% of customers			12-24 hours	
III	Serious Impact Event	5.0 – 9% of customers			24-48 hours	
IV	Major Impact Event	> 9% of customers			36-72 hours	
V	Catastrophic Event	> 9% of customers			> 72 hours	

Each Company shall include a description of its procedures for transitioning from one event classification level to another, as warranted by escalating or diminishing conditions.

IV. INCIDENT COMMAND SYSTEM

A. General Requirements

Each Company shall have an emergency response organizational structure based on the Incident Command System (“ICS”) to prepare for and respond to Emergency Events. Each Company shall identify in its ERP: (1) its specific hierarchical structure in accordance with

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ICS, at each organizational level with operations responsibility, from the highest level of operations authority (e.g., total company or total system) to the lowest, most local operations level; and (2) the incident command level activated and actions taken for each Event Classification Level listed in Table 1.

Each Company shall be responsible for ensuring that (1) the ERP is up to date, (2) all positions are adequately and sufficiently staffed, (3) all assigned personnel are adequately and sufficiently trained, (4) ERP drills and exercises are conducted as scheduled in Section VI(C), and (5) the Company has adequately and sufficiently stocked all materials, vehicles, and communications equipment necessary to support its response effort.

Each Company shall also describe its process for keeping its senior management apprised of Emergency Events, and the means by which its senior management provides strategic guidance to an Incident Commander.

B. System-level Command Structure

1. Incident Commander

Each Company shall establish and identify in its ERP the position of Incident Commander, who upon activation of the ERP shall be responsible for directing and coordinating the various aspects of the Company's response efforts.

The ERP shall identify the responsibilities of the Incident Commander which shall include, but not be limited to:

- 1) determining which components of the ERP shall be initiated by an event, based upon the event level associated with the event;
- 2) determining the resources required to respond to an event, and directing the efforts to (i) obtain the required resources, and (ii) allocate available resources on a system-wide basis;
- 3) coordinating the efforts of the Sub-Commanders within a Company's ICS organizational structure;
- 4) providing restoration response status information, as warranted and appropriate, to senior management;
- 5) implementing the ERP demobilization process; and
- 6) implementing the post-event review process.

Each Company's ERP shall include (1) a full description of the duties and responsibilities of the Incident Commander (see Attachment 1 for format), and (2) a checklist of all actions (with associated forms and documents) to be taken during the (i) Pre-Event Stage, (ii) Service Restoration Stage, and (iii) Post-Event Stage, as applicable, for each event level.

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2. Key Positions

Each Company shall establish positions that will be responsible for overseeing the following key functions at each ICS organizational level with operations responsibility during an Emergency Event:

- 1) Service Restoration;
- 2) Environmental Response;
- 3) Worker Health and Safety;
- 4) Customer Communications;
- 5) Communications with Government Officials;
- 6) Logistics and Field Support; and
- 7) Finance and Administration.

Each Company's ERP shall provide a full description of these key functions, as described in Section V of these Guidelines.

3. Organizational Chart

Each Company's ERP shall include an organizational chart that identifies (1) the Incident Commander and other key positions in each ICS organizational level with operations responsibility during Emergency Events, and (2) the job title(s) within the Company that upon activation of an ERP would fill each key position.

C. Sub-level Command Structure

1. Sub-Commanders

Each Company shall establish and identify in its ERP the position of Sub-Commander for each ICS organizational level with operations responsibility, who shall be responsible for directing and coordinating the Company's emergency response efforts within that level during an Emergency Event. Each Sub-Commander shall report directly to the Incident Commander and shall assist the Incident Commander in executing his or her responsibilities.

Each Company's ERP shall include (1) a full description of the duties and responsibilities assigned to the Sub-Commander(s) (see Attachment 1 for format), and (2) a checklist of all actions (with associated forms and documents) to be taken during the (i) Pre-Event Stage, (ii) Service Restoration Stage, and (iii) Post-Event Stage, for each event level.

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2. Key Positions

Each Company shall establish and identify in its ERP positions that will be responsible for overseeing at each ICS organizational level the key functions identified in Section V during an Emergency Event.

3. Organizational Chart

Each Company's ERP shall include an organizational chart that identifies for each ICS organizational level with operations responsibility (1) the Sub-Commander and other key positions in each organizational sub-level command structure, and (2) the ICS support position(s) within the Company that upon activation of an ERP would fill each key position.

V. KEY FUNCTIONSA. General Requirements

Each Company's ERP shall include a full description of how it addresses each of the key functions described below. The description shall include (1) an organizational chart that identifies the positions for these key functions at each ICS level of the organization with operations responsibility during an Emergency Event, (2) a full description of the duties and responsibilities assigned to each position responsible for a key function (see Attachment 1 for format), and (3) a checklist of all actions (with associated forms and documents) to be taken by each position during the (i) Pre-Event Stage, (ii) Service Restoration Stage, and (iii) Post-Event Stage, for each event level.

B. Service Restoration

Each Company's ERP shall establish and describe in detail the procedures by which it will address service restoration issues that arise in the course of an Emergency Event, including, but not limited to, procedures for:

- 1) Event Evaluation
 - a. establishing the level of ERP activation based on the event level
 - b. determining when centralized versus decentralized control is appropriate
 - c. coordinating internal resources
- 2) Damage Assessment
 - a. describing the methods for making, within 24 hours, broad-scale preliminary assessments of the nature and extent of system damage based on rapid surveys of damaged areas and other data sources, and for making, within 48 hours, more detailed estimates of system damage based on systematic field surveys

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- b. compiling, analyzing, and evaluating damage assessment and other pertinent and available trouble data
 - c. describing the methods and means that will be used to communicate with damage survey crews and service restoration crews
- 3) Crew Resources
- a. estimating necessary crew, material, and other resource needs
 - b. evaluating and documenting the need for mutual assistance (prior to and during the event)
 - c. interpolating the results of damage assessment in order to make reliable projections of the personnel, equipment, materials and time that will be needed to rapidly and safely achieve service restoration goals in all damaged areas
 - d. providing the procedures for deploying company, mutual aid, and contractor crews to work assignment areas, monitoring crew activity, reassigning crews as necessary and releasing crews, under both centralized and decentralized command modes
- 4) Restoration Priorities and Coordination
- a. identifying restoration priorities to ensure that restoration time is minimized, while considering the needs of customers on the “critical facilities” list and Life Support Customers
 - b. identifying the procedures for coordinating Company restoration procedures with those of other Companies’ restoration efforts and with state and local emergency management and public works agency efforts

C. Environmental Response

Each Company’s ERP shall describe in detail the procedures by which it responds to environmental incidents that arise in the course of an Emergency Event, including, but not limited to, procedures for:

- 1) assessing incidents to determine the appropriate level of response;
- 2) identifying hazardous conditions;
- 3) evaluating and securing spill response resource needs;
- 4) establishing and maintaining communication with spill response personnel; and
- 5) reporting conditions to the Incident Commander.

D. Worker Health and Safety

Each Company’s ERP shall describe in detail the procedures by which it ensures the health and safety of workers in the restoration effort during an Emergency Event, including but not limited to procedures for:

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- 1) identifying hazardous situations associated with an event;
- 2) exercising emergency authority to stop and prevent unsafe acts or correct unsafe conditions;
- 3) providing human resource support to impacted employees and their families;
- 4) reporting conditions to the Incident Commander; and
- 5) notifying senior management of any significant employee/labor issues.

E. Customer Communications

Each Company's ERP shall establish and describe in detail the procedures by which it will communicate with customers during an Emergency Event, including, but not limited to, procedures for:

- 1) ensuring that the Company responds to customer calls in a timely manner, including ensuring sufficient staffing levels to handle the extraordinary volume of customer calls that are normally placed during significant events;
- 2) developing Public Service Announcements to ensure unity of message regarding status of service interruptions, projections for service restoration, and other pertinent information;
- 3) contacting Life Support Customers; and
- 4) referring Life Support Customers, and individuals with special needs, to contact public safety officials.

F. Communications with Government Officials

Each Company's ERP shall establish and describe in detail the procedures by which it will communicate with Department staff, Massachusetts Emergency Management Agency ("MEMA") personnel, state and local public safety officials, and/or their designees, during an Emergency Event, including, but not limited to, procedures for:

- 1) providing advance notice to the officials described above, establishing a dedicated line of communication and providing restoration effort information during an Emergency Event, as discussed in Section VII, below;
- 2) receiving and processing calls from Department staff, MEMA personnel, public safety officials, and/or their designees and providing frequent and timely feedback;
- 3) meeting regularly with Department staff, MEMA personnel, public safety officials, and/or their designees to discuss emergency response, as discussed in Section VI.B below; and
- 4) ensuring unity of message.

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G. Logistics and Field Support

Each Company's ERP shall establish and describe in detail the procedures by which it will provide logistical and field support during an Emergency Event, including, but not limited to, procedures for:

- 1) securing external resource requirements (e.g., line crews, crew guides, wires down standby personnel, damage assessors, and tree crews), including resources acquired through Mutual Assistance Agreements;
- 2) maintaining on-hand inventory;
- 3) procuring and distributing materials and supplies;
- 4) managing vehicle assignments;
- 5) administering and mobilizing vendor contacts;
- 6) overseeing the mobilization, operation and demobilization of staging areas; and
- 7) securing lodging, meals, and other alternate housing arrangements.

H. Finance and Administration

Each Company's ERP shall establish and describe in detail its financial and administrative procedures during an Emergency Event, including, but not limited to, procedures for:

- 1) processing financial, compensation, and claims-related matters; and
- 2) providing facility support and ensuring critical infrastructure remains operational.

VI. ADVANCE PLANNING AND TRAININGA. General Requirements

Each Company's ERP shall include a detailed description of the actions it will take to ensure that it adequately and sufficiently prepares to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. These actions shall include, but not be limited to, (1) meetings with Department staff, MEMA personnel, public safety officials, and/or their designees (2) conducting training and drill exercises, and (3) maintaining updated lists of personnel and entities that may assist in the Company's restoration efforts.

B. Meetings with Government Officials

Each Company shall hold one or more meetings, at least annually, with:

- 1) appropriate local elected and appointed officials of each of the cities and towns in which it provides service to ensure the effective and efficient flow of information between the Company and local elected and appointed officials during an Emergency Event;

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- 2) state and local public safety officials of each of the cities and towns in which it provides service to ensure the effective and efficient coordination between the Company and local public safety officials during an Emergency Event, including Company policies and procedures that will identify service locations of its LSCs and refer all requests by LSCs and other special needs customers to public safety officials for response; and
- 3) tree wardens or appropriate official of each of the cities and towns in which it provides service, to ensure the effective and efficient coordination between the Company and city or town regarding (i) the Company's annual vegetation management practices, and (ii) the Company's response during an Emergency Event.

Each Company shall provide sufficient advance notice to invitees of each of the meetings identified above to allow appropriate attendance and participation. Each Company shall provide, sufficiently in advance of each of the meetings identified above, an agenda and pertinent presentation materials to invitees of such meeting. A Company may schedule joint meetings with invitees.

C. Training Sessions and Drills/Exercises

Each Company shall use training sessions and drills/exercises to prepare for an Emergency Event, and to test the adequacy and effectiveness of its personnel performing job functions outside of their normal areas of responsibility in implementing the Company's ERP during an Emergency Event. Each Company shall conduct drills that correspond to each specified event level.

Each Company shall conduct:

- 1) training sessions, at least annually, for all employees to whom the Company has assigned responsibilities during an Emergency Event. The purpose of these training sessions is to ensure that these employees can effectively and efficiently perform their assigned responsibilities during such an event; and

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- 2) drills/exercises, at least annually, for all employees to whom the Company has assigned responsibilities during an Emergency Event. The purpose of these drills/exercises is to test the Company's ability to restore service to its customers in a safe and reasonably prompt manner during an Emergency Event. Each Company shall provide sufficient advance notice to (i) local elected and appointed officials, (ii) state and local public safety officials, and (iii) the Department to allow appropriate participation in the drills/exercises. Each Company shall include in its drills/exercises (i) simulations of all event response assignments and (ii) communication with outside agencies, local governments and others who would normally be included in service restoration responses. The Company shall include, as part of its drill/exercise activities, table-top exercises that address how the Company would respond to an Emergency Event that occurred coincidentally with (i) loss of business continuity, (ii) a national emergency, or (iii) a pandemic incident.

Each Company shall complete its training and drills/exercises prior to August 1 of each year. Each Company shall provide additional detailed training sessions, prior to November 1 of each year, to new Company staff or other staff who have been given new event response assignments.

D. Contact Information

Each Company shall maintain updated lists of contact persons for Emergency Events, with titles, addresses, phone numbers and other pertinent data as appropriate, for the following:

- 1) all utility personnel assigned event response positions;
- 2) mutual aid companies and contractors;
- 3) LSCs of record;
- 4) facilities on the Company's "critical facilities" list, including area hospitals and other state or municipal Level 1 critical care facilities;
- 5) print and broadcast media;
- 6) operators/managers of retained motels, restaurants and dormitories, etc.;
- 7) state, county and local elected officials, the Department of Energy Resources ("DOER"), law enforcement officials, and emergency management and response personnel within a Company's service territory; and
- 8) vendors.

Regarding LSCs, maintaining an updated list of these customers means that each Company shall (1) immediately add customers to the LSC list upon notification from customers of their medical need for electric service and (2) verify the contact information of those customers on the LSC list at least annually.

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VII. REPORTING REQUIREMENTSA. Advance Planning and Training Reports

As required by 220 C.M.R. § 19.03(4)(a), each Company shall submit a detailed report with supporting documentation to the Department for each meeting, training, and drill/exercise held pursuant to 220 C.M.R. § 19.03(2)(a)2.

1. Meetings with Government Officials

For each meeting identified in Section VI.B, above, each Company shall file with the Department a report that includes, but is not limited to, the following information:

(1) invitees, and their job titles; (2) attendees and their job titles; (3) the agenda; (4) all presentation materials; (5) minutes; (6) action items that result from the meeting; and (7) status of each identified action item. Each Company shall file this report by September 1 each year.

2. Training Sessions and Drills/Exercises

For each of the training session and drills/exercises identified in Section VI.C above, each Company shall file with the Department a report that includes, but is not limited to, the following information: (1) the date of the drill/exercise; (2) participants, their job titles, and their responsibilities during Emergency Events; (3) a full description of the type of event that is the subject of the drill/exercise; (4) a detailed evaluation of the performance of the Company in the drill/exercise, including lessons learned and action items that result from the drill/exercise; and (5) status of each identified action item. Each Company shall complete its drills/exercises by August 1 and file this report by September 1 each year.

3. Contact Information

Each Company shall file with the Department its updated list of contact persons identified in Section VI.D above in a report that includes, but is not limited to, the following information: contact persons; titles; addresses; phone numbers; and other pertinent data. Each Company shall file this report by September 1 each year.

B. Outage and Service Interruption Reports1. Outage and Accident Reporting Procedures

Each Company shall continue to report every sustained distribution and transmission interruption that occurs within or impacts its service territory as required by the Department's Outage and Accident Reporting Procedures set forth in Service Quality Guidelines, D.P.U. 04-116-C (2007) (Service Quality Guidelines, Section VIII.H). The content and format of these

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reports is shown in Attachment 2 to these Guidelines. In addition, each Company shall file annually with its ERP a compact disc that contains a compilation of the previous year's reports, in a working Excel spreadsheet format.

2. Emergency Event Reporting

a. General Requirements

As required by 220 C.M.R. § 19.03(4)(b), each Company shall provide periodic reports to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, that contain detailed information related to emergency conditions and restoration performance for each affected city and town. Different event levels may trigger different levels of reporting detail; the ERP shall clearly describe the level of reporting for each event level. The ERP shall include at a minimum the reporting requirements in subsections b, c, and d, below.

b. Pre-Event Stage Reports

During the Pre-Event Stage, each Company shall provide, no less than every eight hours, the following information to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, and the DOER:

1. Weather forecasting and monitoring;
2. Planned storm conference calls (indicate date and time);
3. Pre-event communications with the public, municipal contacts, and elected officials (describe communication methods);
4. Pre-event notifications with regulators, MEMA and LSCs (describe communication methods);
5. Expected Event Classification Level (describe expected severity);
6. Resource readiness (indicate actions taken to ensure availability of crews and material resources indicating type and quantity of available crews);
7. Likelihood of EOC being opened (indicate date and time predicted to be opened or opened);
8. Problems anticipated or encountered in preparation for the anticipated Emergency Event; and,
9. Any other pertinent information.

c. Service Restoration Stage Reports

During the Restoration Stage, each Company shall provide periodic reports to the Department, appropriate regional MEMA representatives and municipal emergency managers, or their designees, and DOER that contain detailed information related to emergency conditions and

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restoration performance for each affected city and town. The content and format of the information to be included in these reports, as well as the required frequency of the reports, are shown in Attachment 3 to these Guidelines.

In addition, no later than seven days after the end of an Emergency Event, each Company shall provide a report to the Department that includes all necessary updates and corrections to its Service Restoration Stage reports.

d. Final Event Report

As required by 220 C.M.R. §19.03(4)(c), each Company shall submit a detailed report with supporting documentation to the Department on its restoration performance during a Level IV or V event, including lessons learned, no later than 30 days following such an event. The content and format of information to be included in this report is shown in Attachment 4 to these Guidelines. Upon Department request, a Company shall submit a report for a Level III event.

VIII. FILING OF EMERGENCY RESPONSE PLAN

Each Company shall file an ERP, which the Company has reviewed and updated within the previous twelve months, with the Department on or before May 15 each year, for review and approval. The filing shall include a copy of all written Mutual Assistance Agreements into which the Company has entered, and identify and describe any modifications to the ERP and Mutual Assistance Agreements since the previous ERP filed with the Department.
220 C.M.R. § 19.04(3).

IX. ATTACHMENTS

- Attachment 1: Duties and Responsibilities of Key Positions
- Attachment 2: Outage and Accident Reporting Procedures Requirements
- Attachment 3: Service Restoration Stage Report
- Attachment 4: Final Event Report

Attachment 1

Duties and Responsibilities of Key Positions

- A. Position Title:
- B. Reports to:
- C. Position Duties and Responsibilities:
- D. Pre-Emergency Preparations:
- E. Duties, Responsibilities, and Actions during an Emergency Event:
- F. Post-Emergency Event Responsibilities and Reports:
- G. Equipment Required:
- H. Position work location:
- I. Work period:
- J. Activation notification:

And some positions also contain:

- K. Major Event Activation:
- L. Additional Responsibilities during Major Events:
- M. Additional Equipment Requirements and
- N. Additional Staff Requirements:

Attachment 2 - Outage and Accident Reporting Procedures Requirements								Table A	
Each Company shall provide the information listed in Table A to the Department consistent with the Outage Reporting Protocol set forth in the Department's Service Quality Guidelines in D.P.U. 04-116-C.									
1	2	3	4	5	6	7	8	9	10
Incident ID	Date Filed	Company Name	District/ Division Name	Location of interruption (City/ Town Where Fault Occurred)	Street Name	Substation Name and ID	Circuit Number ID	Circuit Branch ID	Voltage Level to the Nearest (Transmission, 35kV, 25kV,12kV, 5kV, Secondary)
11	12	13	14	15	16	17	18	19	20
Circuit type (OH/UG/ Customer Owned)	Original Number of Customers Affected	Current Number of Customers Affected (show zero if restoration is completed)	Actual Duration (in hours)	Total Customer Interruption Hours	Date and Time Out	Date and Time In	Reason for Interruption (nature/ cause of interruption)	Failed or Damaged Device/ Equipment	Indicate if the Interruption was Planned/ Unplanned/ Intentional
21	22	23	24	25	26	27	28	29	30
Weather Condition	Primarily Affected Load Type (Residential/ Industrial/ Commercial/ Mix)	Whether the Interruption Affected a Critical Facility/ Customer (yes/no)	Whether the Interruption is Major Excludable Event (yes/no)	Whether an Injury Occurred as a Result of the Event (yes/no)	Name of the Person Responsible for Filling the Report	Time Restoration Commenced	Expected Duration	Town/City Official Notification (yes/no)	Name of Notified/ Contacted Person
31	32	33	34	35	36	37			
Telephone Number of Notified/ Contacted Person(s)	Official Notified Name 1	Official Notified Phone 1	Official Notified Name 2	Official Notified Phone 2	Report Type	Comments			

Appendix: Final ERP Guidelines and Attachments

Attachment 4 - Outage and Accident Reporting Procedures Requirements								Table A	
Each Company shall provide the information listed in Table A to the Department consistent with the Outage Reporting Protocol set forth in the Department's Service Quality Guidelines in D.P.U. 04-116-C.									
1	2	3	4	5	6	7	8	9	10
Incident ID	Date Filed	Company Name	District/ Division Name	Location of interruption (City/ Town Where Fault Occurred)	Street Name	Substation Name and ID	Circuit Number ID	Circuit Branch ID	Voltage Level to the Nearest (Transmission, 35kV, 25kV, 12kV, 5kV, Secondary)
11	12	13	14	15	16	17	18	19	20
Circuit type (OH/UG/ Customer Owned)	Original Number of Customers Affected	Current Number of Customers Affected (show zero if restoration is completed)	Actual Duration (in hours)	Total Customer Interruption Hours	Date and Time Out	Date and Time In	Reason for Interruption (nature/ cause of interruption)	Failed or Damaged Device/ Equipment	Indicate if the Interruption was Planned/ Unplanned/ Intentional
21	22	23	24	25	26	27	28	29	30
Weather Condition	Primarily Affected Load Type (Residential/ Industrial/ Commercial/ Mix)	Whether the Interruption Affected a Critical Facility/ Customer (yes/no)	Whether the Interruption is Major Excludable Event (yes/no)	Whether an Injury Occurred as a Result of the Event (yes/no)	Name of the Person Responsible for Filling the Report	Time Restoration Commenced	Expected Duration	Town/City Official Notification (yes/no)	Name of Notified/ Contacted Person
31	32	33	34	35	36	37			
Telephone Number of Notified/ Contacted Person(s)	Official Notified Name 1	Official Notified Phone 1	Official Notified Name 2	Official Notified Phone 2	Report Type	Comments			

Attachment 4 - Final Event Reporting Requirements (Table B)

Each Company shall include the information listed below in its Final Event Report.

1	▪ Weather
	• Actual weather
	• Maximum winds experienced
	• Duration of incident
2	▪ Transmission Lines
	• List of transmission lines that became inoperative
	• Repairs made
	• Estimate for repairs
3	▪ Substations
	• List of substations which incurred damage
	• List of equipment damaged
	• Estimate of repairs
4	▪ Distribution Feeders
	• List of feeders affected
	• List of feeders locked out
	• Was backup to feeders sufficient
5	▪ Trouble Order System
	• Total Number of Customer Outages
	• Number of trouble orders
	• Did the system function as it was designed
	• Was there sufficient manpower available to operate the system
6	▪ Wire Down Operations
	• Total number of Priority wire down calls
	• Number of wire down trouble calls
	• Did the system function as it was designed
	• If de-centralization occurred did the system function as it was designed
7	▪ Pole Damage
	• Number of broken pole trouble calls
	• Number of broken poles replaced by location size and age of the old pole
8	▪ Wire Damage
	• Number of feet, type, and size of primary and secondary conductors replaced
	• Number of feet, type, and size of follow-up reconductoring to be done

Appendix: Final ERP Guidelines and Attachments

9	▪ Transformers damaged
	• Listing by size, type and age of damaged transformer
	• Availability of replacements
10	▪ Crew Supplements
	• Total number of Company crews and from which locations
	• Number and type of crews from outside the Company
	• Availability and use of wire down appraisers
11	▪ Food and Lodging
	• Listing of lodging and number of rooms and meals
	• Was food available and adequate
	• Was there provisions for noon meals at the job sites
12	▪ Equipment
	• Number and type of vehicles used
	• Type and number of equipment breakdowns
	• Type of equipment rented
13	▪ Helicopter
	• Were helicopters available
	• How were the helicopters used
	•
14	▪ Media
	• Was the Media kept updated and informed
15	▪ Public Officials
	• Was contact and cooperation maintained with municipal and state officials
16	▪ Stock/Materials
	• Was material adequate and readily available to make repairs
	• Were stock rooms properly equipped and staffed
17	▪ Vegetation Management
	• Were crews readily available and properly equipped
	• Numbers crews used by type, company and community
18	▪ Communication
	• Were the vegetation trouble calls handled by highest priority
	• Was communication follow smooth, detailed, accurate and timely
18	▪ Communication
	• Were there adequate, communication methods: radios, frequencies and cell phones
	• Was the communication with external resources adequate, timely, and detailed