

Vaughn L. McKoy
General State Regulatory Counsel

Law Department
80 Park Plaza, T-5, Newark, New Jersey 07102-4194
tel: 973.430.8325 fax: 973.430.5983
email: Vaughn.McKoy@pseg.com

September 20, 2012



VIA REGULAR AND ELECTRONIC MAIL

Honorable Kristi Izzo, Secretary
State of New Jersey
Board of Public Utilities
44 South Clifton Avenue – 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: **PSE&G's Comments: Performance Review of EDCs in 2011 Major Storms**

Dear Secretary Izzo:

Attached are comments of Public Service Electric and Gas Company ("PSE&G") to the report prepared by Emergency Preparedness Partnerships ("EPP") dated August 9, 2012 and entitled, *Performance Reviews of EDCs in 2011 Major Storms*. PSE&G thanks the Board for the opportunity to comment on both the Global and PSE&G specific recommendations, some of which have been completed or are underway. PSE&G is committed to working with the Board to ensure reliable service to customers and the safety of our employees and communities we serve. As such, PSE&G concurs with the Global and PSE&G specific recommendations, except in the limited circumstances noted in the attached comments. Some of the recommendations can be implemented without delay, while others require more analysis through working groups that we understand will be established after the comment period. PSE&G looks forward to working with Board staff in addressing those recommendations.

If you have any questions or comments regarding this matter, please feel free to contact Donald W. Weyant, Manager – Regulatory Compliance at (973) 430-6730.

Very truly yours,

A handwritten signature in blue ink that reads "Vaughn L. McKoy".

Vaughn L. McKoy

Attachment

C J. P. Giuliano, Director (Email only)
J. May, Director (Email only)

PSE&G's COMMENTS
FINAL REPORT
"PERFORMANCE REVIEW OF EDCs IN 2011 MAJOR STORMS
AUGUST 9, 2012"

PSE&G's comments on the above referenced Report by Emergency Preparedness Partnerships (EPP) are as follows:

I. FACTUAL ERRORS

The following factual errors were observed:

- Page 39 – Please add Burlington County to the Counties served by PSE&G.
- Page 89 – In the chart under “Employees” and “Emails”, there should be a “yes” for PSE&G.
- Page 101 – On October 29th, 30th, and 31st PSE&G requested 500 FTEs (linemen), not 340.
- Page 113 – To clarify, Scotch Plains Substation was not shut down due to flooding at the site. Flooding caused the shutdown of Cranford Substation which interrupted the 26-kV supply to Scotch Plains Substation.
- Page 202 – The Call Center staffing figures for August 27th and for all the dates during the October Snow Storm only included PSE&G associates. They should also include agents from ERS, PSE&G's Third Party Call Center whose agents were included for the dates of August 28 – September 4th during Irene. The corrected figures are as follows:

August 27 – 106, not 92
October 29 – 140, not 121
October 30 – 176, not 162
October 31 – 376, not 314
November 1 – 420 not 366
November 2 – 428, not 387
November 3 – 413, not 372
November 4 – 327, not 297
November 5 – 91, not 80

II. PSE&G COMMENTS

A. Global Recommendations

1-G-2 – PSE&G concurs but would like more clarity regarding this Recommendation. A Working Group to address this issue is appropriate.

11-G-1 – PSE&G would like more clarity regarding this Recommendation. A Working Group to address this issue is appropriate.

B. PSE&G Specific Recommendations

7-PSE&G-2 – PSE&G disagrees with this Recommendation. A Working Group to address this issue is appropriate.

9-PSE&G-2 – PSE&G concurs with this Recommendation but will also pursue additional mutual aid agreements.

13-PSE&G-1 – PSE&G disagrees with this Recommendation as assignments are worked with the safety of our employees and the public being the highest priority.