



Rockland Electric Company

Rockland Electric Company  
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September 20, 2012

**VIA EMAIL AND REGULAR MAIL**

Honorable Kristi Izzo  
Secretary  
State of New Jersey  
Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

**Re: Performance Review of EDCs in 2011 Major Storms**

Dear Secretary Izzo:

Rockland Electric Company (“RECO” or the “Company”) has reviewed the Performance Review of EDCs in 2011 Major Storms (“Storm Report”) prepared by Emergency Preparedness Partnerships for the Board of Public Utilities (“Board”). RECO supports the ongoing process of improving the preparedness for severe weather events, enhancing the electric distribution companies’ (“EDCs”) ability to communicate accurate and timely information effectively to customers and local authorities, and bolstering the effectiveness of recovery operations. RECO has addressed and will continue to address both the generic and Company specific recommendations set forth in the Storm Report. Where applicable, the Company has or will modify its respective emergency plans. In addition, we have reviewed the Storm Report’s recommendations to the other New Jersey EDCs and will incorporate those recommendations into our emergency plans, protocols, and employee training where appropriate.

RECO would note that it has implemented and/or is in the process of implementing various process enhancements including those described below.

**Additional Call Center System/Technology Enhancements**

Consistent with Recommendation 23-RE-1, in the first quarter of 2012, the Company contracted with a third-party vendor, Twenty First Century Communications (“TFCC”), to provide call handling solutions for high call volume activity resulting from major storms or other emergency events. The Company’s Call Center now has the ability to activate the TFCC service on a 24/7 basis and route all calls coming into the Company’s toll-free number to TFCC in cases of high or anticipated high call volume. TFCC’s automated call handling system will route the calls to its Interactive Voice Response (“IVR”) platform. The IVR will provide customers with a recorded message with information about the event including Estimated Restore Time (“ERT”) information as such information becomes available. Customers also will be able to report their outages to the Company on a real time basis.

The Company has enhanced and expanded its internal communications infrastructure. The revised network design will offer greater functionality and flexible toll-free routing for increased customer calling capacity during storm or emergency events. Specifically, the Company expanded its toll-free network by 60% by increasing the total number of circuits into the Company's Spring Valley Call Center, from 230 to 368. Along with this increase, overflow routes have been developed which could provide an additional 120 circuits for routing to customer care agents should the enhanced Spring Valley capacity levels become congested.

### **Expanding the Use of Newer Communications Technologies**

The Company recognizes the importance of incorporating the use of social media to complement its traditional communications activities with its customers. The Company has established Facebook and Twitter accounts that are primarily used to provide customers with an alternative way to obtain important information such as storm damage, outage and restoration progress information, safety tips, energy efficiency tips and other Company news. The Company also maintains a YouTube account that generally illustrates storm damage and recovery efforts.

### **Use of Contracted Damage Assessors**

The Company's updated Damage Assessment storm functional plan has incorporated the use of contractor resources when needed. The plan includes minimum staffing requirements which are used so that our internal damage assessor staffing is sufficient for quick initial response to weather events and, when necessary, for supplementing these resources with contract personnel. During predicted larger storm events, discussions concerning contractor staffing requirements will begin early in the preparation process. If additional damage assessment contractor crews are warranted, the Contractor Coordinator will contact the contractor companies to determine availability of trained resources and make arrangements for mobilization.

### **Obtaining Crews from Out of State**

In response to the difficulties obtaining overhead line crews to assist in restoring outages following Hurricane Irene, the Company has developed a database of overhead contractors. This database is sub-divided into four zones based on the location of the contractor's crews and the associated travel time to the Company's service territory. The database will be used in conjunction with the Company's process for obtaining mutual aid outside resources.

Consideration of rest time restrictions dictates the deployment of arriving mutual assistance/contractor crews to field operations. Those crews arriving in the morning will be processed (e.g., orientation, safety briefing, crew guide assignment) and assigned to field operations. Typically, crews arriving in the late afternoon or evening that have worked earlier in the day or traveled significant distances will be processed and directed to lodging facilities in preparation for work assignments the following day.

The Company has contacted these contractors and procured information on their capabilities, storm rates, liability insurance, union affiliation, and emergency contact information. Purchase orders have been established with several of these contractors.

### **Enhanced Use of Affiliate Resources**

Consistent with Recommendations 9-RE-1 and 22-RE-2, following the storms of 2011, the Company assembled a cross functional team to review the Company's response and performance during severe storms that cause extensive damage to the Company's distribution system. One of the primary areas of focus for this cross functional team was to improve the coordination of resources between Con Edison and RECO's corporate parent, Orange and Rockland Utilities, Inc. ("O&R"). This team's work resulted in a number of enhancements to the Company's Emergency Response Plan ("ERP"). Some examples of the enhancements include:

- Developed a new process to utilize Con Edison Customer Service Representatives to support O&R Customer Service representatives during peak call periods;
- Developed a new process for assessing mutual assistance and contractor requirements for both O&R and Con Edison during emergency responses and distributing the available resources between the two companies in the most effective manner;
- Revised the O&R ERP to incorporate the use of the Incident Command System ("ICS");
- Revised the O&R ERP to include participation in Con Edison's pre-storm conference calls; and
- Revised the O&R ERP to include participation in Con Edison's ICS calls during events.

### **Prioritization of Energized Wire Down Situations**

The Company prioritizes response to individual trouble calls based upon a restoration matrix developed subsequent to the October snow storm. The matrix provides specific guidance regarding the assignment of a priority rating of 1 to 4 (1 being the highest priority) to all incidents in the Company's outage management system. The matrix includes specific priority codes for calls involving a downed wire (WD1 – wire down priority 1; WD2 – wire down priority 2; and all other downed wire calls) Factors used to assign a wire down priority code include; voltage (primary or secondary); proximity to high pedestrian areas or schools; blocked roads; and access obstructions to critical municipal identified facilities.

### **Development of Localized ETRs**

In conformance with Recommendation 15-RE-1, the Company has developed a protocol for providing estimated times of restoration ("ETRs") based on available crews applied to a historically based algorithm that predicts the amount of work required to restore 90% of customers affected based on the number of incidents and type of storm damage.

Using historical data, the Company's algorithm takes into consideration the actual number of incidents during an event and the average incident duration of similar past events, to determine the Total Damage Hours ("TDH") of a particular event. The Company then divides the TDH by the available Total Working Hours ("TWH") of the known available crews to determine the ETR for any area.

The Company has developed an ETR guideline incorporating this process and such guideline will be implemented during future storm events.

### **Enhancements to the Logistics Management Process**

Enhancements to the Company's logistics process have been made and are continuing. With respect to staging area management, following the major storms of 2011 the logistics/lodging group has reevaluated their staffing requirements and the staffing levels for this storm function have been increased accordingly. We also have made arrangements to obtain dry ice to meet our obligations to customers.

Consistent with Recommendation 19-RE-1, since the 2011 storms our lodging/food coordinator has investigated and developed a comprehensive list of primary and secondary lodging and food locations throughout the Company's service area. The lodging and food list was developed with input from key personnel from our Electric Operations, Emergency Management and outside resources. This contact list is reviewed twice a year and is updated as needed.

### **Increased Use of the Retiree Workforce**

The Company is in the process of formalizing the use of its retiree workforce. This process involves:

- Maintaining a retiree storm participant list;
- Contacting retirees for mobilization as instructed by the Incident Command or Emergency Management personnel;
- Updating third party employment agency documentation for all retirees, as necessary, as they are mobilized for deployment to storm assignment;
- Providing refresher training to retirees on an annual basis prior to the hurricane season; and
- Working with the Safety Department so that all retirees receive the required "safety briefing" prior to deployment to storm assignment.

Please contact me if you have any questions regarding this matter.

Very truly yours,

*Francis W. Peverly* <sup>ged</sup>

Francis W. Peverly  
Vice President - Operations