Date Filed: September 28, 2026

Witness: Christopher E. Colorio and Mark P. Baldwin
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM REPORTING) Refer to Response to EOE-007. The Company's response included an attachment that referenced multiple filings within Docket No. 25-12-13 (i.e., EOE-57, EOE-75, and EOE-213). Identify the specific storm events from 2018 through 2023 where the Company did not file or could not locate a post storm event report as being filed with the Authority in accordance with Docket No. 86-11-18.

Response:

Post-event reports are required in certain circumstances pursuant to Order No. 6 Compliance issued in Docket No. 86-11-18, DPUC Review of Performance of UI, CL&P and SNETCO in Restoring Service After Storm Carl. The expectations have not changed from this decision to the present. Order No. 6 provides:

> Commencing from the date of the Decision, May 12, 1987, each of the Companies shall file a Report, including time series details of service restoration, to the Public Utilities Regulatory Authority within 14 days of complete restoral of customer service following the implementation at any level of its respective Emergency Plan.

Based on the language of Order No. 6, post-event reports are required only for those storm events where the Company "implemented" a level of its ERP. Thus, the Company is not required to file a 14-Day Report if the ERP is "activated" but never "implemented." This distinction between "activation" and "implementation" is incorporated into CL&P's ERP.

In the sequence of steps taken to prepare for an oncoming storm event, the decision to pre-stage crews is based on several considerations, including the requirement to comply with the minimum staffing requirement of the ERP. The Incident Commander activates the ERP by a "declaration," which is based on potential storm conditions and impacts to the electric distribution system. The "specific criteria" that must be met for pre-staging are that:

- CL&P's Incident Commander determines that circumstances warrant activation of the ERP;
- Pre-staging of resources is appropriate as part of the ERP activation to facilitate the efficient restoration of service to potentially affected customers;

- Pre-staging of resources will be required CL&P to incur incremental cost due to the circumstances at hand; and
- CL&P provides written notice to PURA informing PURA of: (1) the activation of the ERP; (2) the event classification declared; and (3) the decision to pre-stage resources with the potential to incur incremental cost.

Decision, December 17, 2014, Docket No. 14-05-06, Application by The Connecticut Light and Power Company to Amend its Rate Schedules, at 87 (referring to the "specific criteria" delineated in the Testimony of Company Witness Kenneth Bowes at page 50).

Pursuant to Section 2.5 of the Company's ERP, Readiness Conditions, "activation" of the ERP occurs in anticipation of "Emergency Conditions." Section 2.5.4 establishes that ERP activation occurs when "Emergency event conditions are imminent that will cause or have caused significant impact to the Electric System or one or more Eversource business units." Under Section 2.6 of the ERP, if an Emergency Event is likely and is expected to cause significant outages or damage to the distribution system, then the Incident Commander declares an ERP Event, indicating a formal initiation of the ERP.

This declaration constitutes the "activation" of the ERP Event by the Incident Commander, in advance of the onset of actual weather conditions, and when the emergency is "imminent," as required by the ERP. However, in some circumstances the actual weather conditions may be less impactful than anticipated (or may fail to materialize at all), in which case it is not, ultimately, necessary to "implement" the ERP expanded organization and, instead, the Company's electric operations group is able to manage response and restoration activities while standing down the full ERP organization. Mobilizing the full ERP organization creates costs and complications for the workforce both personally and in terms of performing their usual job functions. If costs, inefficiencies and inconveniences can be avoided because the storm is not as impactful as anticipated, then the most appropriate actions is to not undertake the "implementation" of the expanded ERP organization.

The Company did not file 14-Day Reports for storms MS18H, MS21M, MN21P, MS22A, MS22C, MS22D, MS22E, MS22F, MS22G, MN23B, MS23C, MN23T, and MN23AB, because an ERP was either not declared or implemented for these events.

The Company is not able to locate any record of filing a post-event report for storms MS21A and MS21L.