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Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 61-62, 75. The Company concludes that its decision-making was reasonable under the circumstances and that the costs were necessary. Please identify any alternative resource plans considered and explain how cost, restoration time, and risk informed the plan selected.

Response:

The Company's decision making is guided by the Emergency Response Plan ("ERP"), which is the PURA-approved framework for emergency response and restoration. The ERP is founded on a principle of scalability to align with the nature and scope of the emergency event. Based on the best information reasonably available at the time, the Company develops an event-specific resource plan using the ERP Event Level Matrix ("ELM"). The ELM adheres to the National Incident Management System ("NIMS") event level classification structure to provide the Company with the ability to scale its emergency response appropriately to the forecasted and actual damage on the electric system. The Company incurs costs to prepare for an oncoming storm system; to respond to public-safety priorities; and to restore customer outages, among other activities for the benefit of customers and local communities. Please refer to Exhibit CLP-STORM-1, at 29-30.

Public Act 12-148, An Act Enhancing Emergency Preparedness and Response, requires that ERPs address plans for restoring power to 10%, 30%, 50% and 70% of EDC customers. Within the context of the ELM, a resource plan is developed and deployed. As stated in PURA Docket No. 12-06-09 PURA Establishment Of Performance Standards For Electric And Gas Companies – Final Decision, Appendix A, "[i]n addition to submitting its ERP to the PURA for reviews of emergency plans every two years, on or before July 1st, pursuant to the General Statutes of Connecticut (Conn. Gen. Stat.) §16-32e, each EDC will also file the ERP in full when there have been any material changes in the ERP."

The ERP and ELM do not prescribe a single, fixed resource plan for each emergency event. Rather, these guidelines provide a framework for developing an event-specific resource plan based on the information available concerning the anticipated or actual scope of damage, resource availability, and other circumstances. Depending on the circumstances, the Company may use varying levels of resources and, as additional information becomes available, the Company adjusts its resource deployment plan as appropriate and necessary.

In this context, meeting public-safety needs, minimizing restoration time, and risk assessment are considered together rather than independently. As discussed in the Company's response to OCC-556[i], when procuring external resources, the Company balances cost considerations with the paramount goal of restoring service safely, efficiently and as quickly as possible. The primary decision point is the number and deployment of field crews and support personnel, and there is only one resource plan that is created for purposes of a storm event, which is captured in the Incident Action Plans ("IAP"). However, to create the IAP, numerous decisional factors are involved, and the resource plan will continually evolve through the event based on those decisional factors. In essence, any alternative plan would simply involve fewer crews at a longer restoration time or more crews. Decision points include:

- Type, scale and timing of weather event expected
- Confidence level of forecast projections
- Availability of field crews and the presence of regional need.
- Skill sets, skill levels, reliability, capabilities and proximity of field crews
- Number, type and location of forecasted and actual outage and non-outage trouble events and public safety
- Logistical circumstances
- Weather circumstances and mobility during restoration
- Status of internal considerations identified for employees and company systems and equipment
- Status of external considerations identified by external stakeholders

The Company's decisions in response to the 2024-2025 Storm Events were made within the established ERP and ELM framework and incorporated consideration of the circumstances at the time of each decision. The costs incurred were associated with the resources determined to be reasonably necessary at the time to support safe, efficient, and timely restoration of electric service to the customers, taking into account expected restoration timelines, resource availability, and cost. Across all its decision making, risks such as an unsafe, inefficient or unreasonably prolonged restoration are constantly evaluated.

[i] OCC-556 Question:

Referring to Exhibit CLP-STORM-1 at 41. The Company states that it secures the closest available resources to minimize travel time and reduce cost. Please provide comparable rates for contractors, affiliates and mutual-aid crews, and explain how proximity and cost informed resource selection.

OCC-556 Response:

When the Company procures external crews to support storm restoration, it evaluates several interrelated factors. The relative importance of each factor depends on the specific circumstances of the storm event. Generally, these factors include:

1. **Whether the storm is a regional event**. When a storm affects a broader geographic region, utilities may face increased demand and competition for available contractor resources. This can affect both the availability and cost of external crews and may require the Company to make procurement decisions within a limited timeframe.

2. **The quantity and type of resources required**. The Company determines the quantity and type of external resources needed by considering weather forecasts, anticipated damage, current system conditions, available internal resources, and other relevant information at the time of procurement. The Company's resource requirements may change as more information about the storm and its impact becomes available.

3. **The location and availability of crews**. The Company evaluates the location of available crews in relation to its service territory and their ability to mobilize within the necessary timeframe. The proximity of available crews often plays a key role, as crews closer to the service area can typically mobilize faster and charge lower mobilization and demobilization costs.

4. **The unit rate and overall cost**. The Company considers the unit rate or other applicable pricing for each available crew but does not evaluate the unit rate in isolation. Instead, it considers the anticipated total cost of securing and deploying a crew, including mobilization, demobilization, travel, and other relevant costs.

When procuring external resources, the Company balances cost considerations with the importance of restoring service safely, efficiently, and as quickly as possible. Accordingly, the crew with the lowest unit rate may not always represent the lowest total cost or the most suitable resource overall. For example, the Company may secure a crew located closer to its service territory, even if that crew has a higher unit rate than one farther away. A nearby crew may have significantly lower mobilization and demobilization costs and can often begin restoration work sooner. When these factors are considered together, the total cost for the closer crew may be less than that of a more distant crew, despite the higher unit rate. Conversely, during a regional storm event when nearby resources are in high demand or unavailable, the Company may find it necessary or more reasonable to procure crews from farther away.

While the Company frequently will prioritize the closest available resources to minimize travel time and reduce costs, it does not select contractors based on a single factor. Instead, the Company reviews all available information and the unique circumstances of each storm event to identify the resource mix that best supports safe, efficient, and timely restoration while accounting for overall cost.