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Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(STORM) Explain whether Eversource has any after-action process to determine whether pre-staging was excessive, and whether any costs have ever been excluded from storm recovery because forecasted impacts did not materialize.

Response:

The concept of evaluating pre-staging on a hindsight basis as "excessive" is not a valid concept. The concept of an "excessive" pre-staging would mean that the Company pre-staged more crews than it actually needed, which is information that it does not have until after the event has actually occurred. The Company does not have a crystal ball to determine what is going to happen as a result of information it receives about an upcoming weather event. Instead, the Company prepares for and respond to threats to the electric system based on the best available information at the time, taking into account the best-case and worst-case scenario, while erring on the side of caution and conservative implementation of its Emergency Response Plan. Finding out, after the fact, that a particular event did not occur as forecast, is not a "lessons learned."

Rather, it reflects the very challenge of storm planning, which is that actual circumstances are unknown until they occur and actions are taken to scale response. After action reviews and any informal lessons learned are intended to improve the safety and efficiency of storm response and restoration where the Company has a reasonable expectation that the same or similar circumstances will happen again, which is a concept that could never apply to the evaluation of a randomly occurring weather event – each of which is completely unique.