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Witness: Brendan J. O'Brien, Garrett J. Murray, Jeffrey M. Pugliese and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT FEES) Please refer to the Response to OCC-70, where the Company states, "The purpose of the Company's membership with these organizations is to facilitate a mutual assistance network among member utilities, which enables companies to mobilize personnel and equipment to support major restoration efforts."

a. Is the Company stating in this Response that membership in these organizations is necessary for mutual aid?
b. Do these organizations contribute to storm restoration in any manner other than mutual aid from other utilities? If so, please describe.
c. For the test year, please indicate for each storm if the Company relied on these organizations in its storm response and describe how.

Response:

a. No. The Company is not stating that membership in these organizations is required in order to receive mutual assistance. Rather, the Company's participation in organizations such as the Edison Electric Institute (EEI) and the associated regional mutual assistance networks provide an established framework and coordination process through which electric utilities can efficiently request, offer, and deploy restoration resources during major outage events.

   The mutual assistance program is a voluntary partnership among electric companies that facilitates the sharing of skilled personnel, contractors, and specialized equipment when significant restoration efforts are required.

b. Yes. In addition to facilitating the exchange of mutual assistance resources, organizations such as EEI support storm restoration preparedness and response by:

   - Developing and managing mutual assistance procedures, applications, and agreements that enable rapid resource requests and deployment.
   - Coordinating communication between affected and assisting utilities before, during, and after major events, including situational awareness and information sharing regarding storm impacts, resource availability, and travel restrictions.

- Maintaining regional networks that allow utilities to identify available crews, equipment, and contractor resources.
- Conducting industry emergency management forums, preparedness activities, exercises, and post response assessment efforts that help improve future restoration operations.

c. For the 14 storm events that occurred during the test year, the Company did not secure restoration resources through the mutual assistance process facilitated by the Edison Electric Institute (EEI) or its affiliated regional network, the North Atlantic Mutual Assistance Group (NAMAG.)

The Company actively participated in NAMAG coordination and situational awareness activities before, during, and after significant weather events. Specifically, the Company participated in mutual assistance and situational awareness conference calls associated with the January 9th storm, the April 3rd – 4th storm, and the August 9th severe weather event. The Company also participated in industry calls related to Hurricane Helene and Hurricane Milton, which created significant restoration demands across multiple regions of the United States and affected the nationwide availability of utility and contractor resources.