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

Question:

(STORM ERP ACTIVATION VS. IMPLEMENTATION) Does the Company distinguish between an ERP activation versus implementation? If yes, please explain how the Company determines which is applicable. Include all relevant citations to the Company's ERP. Further provide all Company policies and procedures outlining when each designation is applicable. Separately identify whether each storm event provided in Ex. CLP-STORM-2 had "activated" or "implemented" the Company's ERP.

Response:

The Company has used the terms "declared," "activated," and, at times, "implemented" in communications regarding its Emergency Response Plan. These terms are sometimes used interchangeably without intending to convey different operational thresholds. However, the Company's formally tracked operational milestone is the declaration (activation) of the ERP by the Incident Commander.

An ERP is activated through the Incident Commander's declaration that emergency conditions are imminent or have occurred. That declaration serves as the operational start time for the event and is the time maintained for operational and reporting purposes.

Following activation, the Company implements the portions of the ERP that are appropriate based on the circumstances. Depending on how conditions evolve, implementation may range from a limited response to full deployment of the ERP organization. If anticipated conditions do not materialize, portions of the ERP organization may be stood down without full implementation of the expanded response.

Prior to the onset of storm conditions, all steps taken to be adequately prepared for a storm response are taken without any knowledge of what the actual circumstances will be. In the sequence of steps taken to prepare for an oncoming storm event, the pre-staging of crews is an important decision that is undertaken based on a number of considerations.

Pursuant to Section 2.5 of the Company's ERP, Readiness Conditions, "activation" of the ERP occurs in "Emergency Conditions" (Section 2.5.4). 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.

In the six events identified in the question, the ERP was "activated" with a declaration of the ERP Event by the Incident Commander, in advance of the onset of actual weather conditions, and when the emergency was "imminent," as required by the ERP. However, once the actual weather conditions materialized (or failed to materialize at all), the circumstances did not call for the Company to execute its response as an implementation of the ERP organization, i.e., the Company's electric operations group was able to manage response and restoration activities while standing down the full ERP organization. If an emergency event does not materialize to the originally projected ERP level, then "implementation" of the expanded ERP organization is unnecessary.