MANAGEMENT & OPERATIONS AUDIT IMPLEMENTATION PLAN PROGRESS REPORT

LONG ISLAND POWER AUTHORITY and PSEG LONG ISLAND

Department of Public Service Matter No. 16-01248

June 24, 2021





I Introduction

On August 5, 2016, the New York State Department of Public Service (the Department or DPS) solicited proposals from independent consulting firms to perform a comprehensive and regular management and operations audit of the Long Island Power Authority (LIPA) and its Service Provider, PSEG Long Island LLC. The audit was conducted under the LIPA Reform Act of 2013, see Public Service Law (PSL) §3- b(3)(d) and the Public Authority Law (PAL) §1020-f(bb), which provide the audit commence on December 15, 2016, conclude by June 2018, and be re-conducted thereafter every five years.

As provided for in PSL §3-b(3)(d), DPS elected to engage an outside auditing firm, NorthStar Consulting Group, (NorthStar), following a procurement and selection process conducted by DPS, funded by LIPA and approved by the New York State Office of State Comptroller (OSC). Except for review and approval by the OSC, the process of selecting NorthStar and conducting the audit under supervision of DPS staff was the same as management audits of investor-owned utilities (IOUs) in the State. See PSL §66(19).

DPS directed NorthStar to focuse on fourteen areas of operations and management against the Authority's duty to set rates at the lowest level consistent with standards and procedures provided in PAL §1020-f(u). The audit commenced with NorthStar's submission of the first 188 data requests (DRs) to LIPA and PSEG Long Island in January 2017. Between January 2017 and March 2018, LIPA and PSEG Long Island provided NorthStar and DPS staff over 4 terabytes of data consisting of 5,000 individual documents in response to a total of 1,018 DRs. In addition to records, NorthStar auditors conducted over 220 interviews that the NorthStar auditors and DPS staff conducted with LIPA and PSEG Long Island management, staff and LIPA Trustees.

On June 29, 2018, NorthStar's Final Report was released with 49 recommendations. The Report further identified certain recommendations from NorthStar's previous audit in 2013, that because of the broad changes to the Authority's role in operations, reconfiguration of its Board, and transition to a new Service Provider, the auditors recommended should be reviewed jointly with DPS staff to determine the relevance for further implementation.

On July 25, 2018, every audit recommendation was adopted by the Board, which then directed LIPA and the Service Provider to develop and present an implementation plan to the Board for approval within 90 days, following procedures identical to those applicable to investor-owned utilities in New York State. See PAL §1020-f(bb). Following consultation with DPS, LIPA and PSEG Long Island set forth their implementation plan to the LIPA Board on October 24, 2018.

A. <u>Summary of Recommendations and Audit Implementation Plan</u>

NorthStar's 49 recommendations and the status of implementation plans are summarized in the table below. LIPA and PSEG Long Island formed teams within each organization to coordinate the development of plans for each recommendation following a common format used by IOUs.

Each team considered the findings and conclusions supporting each of NorthStar's recommendations as provided in the Final Report. Each implementation plan names at least one designated team leader responsible for carrying out each plan and a member of executive management to whom the leader(s) report. Where appropriate, implementation plans are assigned to joint LIPA-PSEG Long Island members and executives. Individual plans are organized to set forth the objectives and assumptions for each recommendation, followed by specific steps or deliverables, with due dates, that will be taken in the coming months and years to implement each recommendation. Finally, each recommendation includes a Cost Benefit Analysis to summarize projected additional expenditures needed, if any, to carry out implementation; projects benefits, if any, for customers that will be achieved through implementation; and, potential risks that may impede full implementation of a recommendation as envisioned by NorthStar.

Since 2018, LIPA and PSEG Long Island have also coordinated with staff at DPS by providing regular progress reports, additional supporting documentation and written responses to questions as implementation plans were completed. DPS has also provided substantive comments and recommendations on certain audit recommendations deemed completed by PSEG Long Island, and LIPA Internal Audit has issued its set of findings and recommendations simultaneous with this progress report. Revisions requiring changes in expected completion dates, or significant modification requiring additional or revised implementation steps, will be reported in future progress reports to the Board and DPS.

Audit Recommendations and Status as of February 24, 2021.

The table below summarizes the implementation status of all management audit recommendations. The status terms are defined as follows:

<u>Completed</u>: the audit recommendation has been implemented in full and no further action is required.

<u>Recurring</u>: the audit recommendation has been implemented subject only to periodic or recurring activity, reporting or filing requirements set forth in the recommendation.

<u>In-Progress</u>: the implementation plan continues to be executed and is expected to be completed on time notwithstanding possible revisions to due dates of interim steps.

<u>Revised</u>: the anticipated completion date of an audit recommendation has been revised for reasons set forth in the commentary section of that implementation plan.

	LIPA Background and Prior Audit	Status
1	LIPA and PSEG Long Island should work with the DPS to determine which of the outstanding recommendations from the 2013 are still relevant and should be implemented.	Completed

2	LIPA and PSEG Long Island should develop an implementation plan for all audit recommendations (new recommendations and outstanding recommendations that LIPA, PSEG Long Island and DPS determine remain relevant) within 90 days of the Final Audit Report acceptance and submit the implementation plan to the LIPA Board of Trustees and the DPS. The Report could take the form required of the IOUs.	Recurring
3	 LIPA Internal Audit should perform a comprehensive audit of the implementation status of all audit recommendations annually until the next DPS audit is performed. The results of LIPA's audit should be submitted to LIPA executive management, the LIPA Board of Trustees, PSEG Long Island, and the DPS. Within each LIPA audit: An evaluation of progress performance should be included. A progress tracking document should show activities completed to date and those in process. Any revisions to completion targets should be highlighted for management review. 	Recurring
	Executive Management and Governance	Status
4	LIPA Financial Oversight should formally document the results of its PSEG Long Island oversight activities and assessment process annually with submission to LIPA and PSEG Long Island executive management as well as DPS.	Recurring
5	LIPA should formally request appointments or confirm extensions to Board member term periods at least six months prior to term expirations.	Recurring
	Enterprise Risk Management (ERM)	Status
6	LIPA and PSEG Long Island should continue to develop an effective, comprehensive ERM process.	In Progress
	Budgeting and Financial Reporting	Status
7	 Continue to develop and implement the SOS capital program optimization model. Implement improvements identified by PSEG Long Island and LIPA Internal Audit, including: Review and adjust the project description questions. Add a demographic category for "permitting required", which can act as a flag of sorts when running optimization scenarios. Flag projects that are necessary to remediate a violation or to prevent a violation. Review the scoring criteria for each business area when setting up a new project in SOS. Identify any biases toward certain types of projects. Refine the Strategic Objectives and the Success Criteria. Consider including Success Criteria not used for the 2018 budget, such as NPV and the financial risk of deferral. Expand the use of SOS to other business areas, including IT and Customer Operations. Include a step in the SOS optimization process to calibrate value and risk scoring across business units that develop capital projects such as Network Strategy Planning group, Electric Operations, and Reliability Management. IDA should lead a process to review the scoring of projects with similar risk values to ensure the projects are scored on a comparable basis. Similarly, IDA should ensure the different organizations use comparable bases for value scoring the projects using the Strategic Objectives and the 	Completed

	Success Criteria.	
8	Provide LIPA-specific capital budget versus actual expenditure variance data to the BOT in each F&A Committee package.	Completed
9	Update the PSEG Long Island budget procedure to include the determination of incremental O&M expenses associated with new construction.	
10	Complete the process of upgrading LIPA's financial system.	Completed
11	Determine the feasibility and cost of establishing interfaces between PSEG Long Island's MicroStrategy, PCM, and SAP systems to eliminate the need for manual data transfer processes. If cost effective, implement processes to allow electronic data transfer between the systems.	Completed
	Debt Management	Status
12	LIPA should build on its recent success in "homogenizing" groups of debt covenants to increase consistency among other debt instruments.	Completed
	Load Forecasting, System Planning and DSP Development	Status
13	 Develop evaluative criteria or other measures to assess the effectiveness of the planning process. Effectiveness should be measured based on specifics, for example: Number and timeliness of system studies Timeliness of development of PJDs Quality of PJDs (e.g., do they contain all requisite information?) Relative accuracy of conceptual level estimates 	Completed
14	Perform detailed cost-benefit analyses consistent with Transmission Planning's analyses for projects related to thermal overload.	Completed
	Transmission and Distribution (The most important recommendation for improving PSEG Long Island's T&D operations, preventive maintenance and continued improvement require workload resource quantification and can be found in Chapter X – Work Management)	Status
15	Continue implementing the vegetation management program to meet annual targets. Complete the mainline hardening program.	Completed
16	Complete the Emergency Response Training for all employees as required.	Completed
17	Improve Emergency Response Training in the ERP to identify type of training and frequency by position.	
18	Complete development of the CMMS.	In-Progress
19	Continue monitoring SAIFI both from a system and cause basis. Continue targeting and prioritizing programs that address reliability.	Completed

	Program and Project Planning and Management	Status
20	 Perform all policies, procedures and control functions that are currently and formally required. PSEG Long Island should conduct all audits as required in the A&R OSA. Adhere to formal document control policies and procedures. PSEG Long Island should follow the PMP Playbook and its procedures 	Completed
21	The URB management processes and controls should be audited annually until the next DPS Management Audit, to confirm adherence to its charter and control policies and procedures.	Completed
22	Develop and implement procedures related to quality assurance and quality controls for capital programs and projects.	Completed
23	 Address the deficiencies in project estimating by making organizational and process improvements and creating a capital project estimating function/organization equipped with appropriate tools. Establish an organizational group of professional estimators for transmission and distribution that will develop estimates for planning, engineering and construction. Use these internal estimators to set and validate baseline estimates established for contractors. Assess the process used to develop and update estimates for completion. Establish project estimating tools such as a formal data base of project estimates and support tools such as software and develop and manage an estimating data true-up process. Review and document inflation and escalation factors and analyses used to predict project completion costs for each project estimate. Review project budget numbers and cost reporting information to determine whether they represent the most currently approved budget and cost data. Determine whether cost and schedule systems are integrated and whether the project master schedule is appropriately integrated with the approved project budget. Formally document project cost reviews at each level of estimate in detail and at various stages of project completion as called for in Project Cost Management (Procedure TD-PM-002-0004). Review project guidelines for performing trend analyses and exception reporting. Evaluate how trends were identified, analyzed, brought to management's attention, and how they were resolved. Determine whether cost control systems, forecasting and trend analyses directed attention to bulk rates, commodities and productivity to reveal above/below average performance. 	Completed
24	 Utilize a WBS in the initial phases of the project justification and conceptual estimating and continue their refinement as the project progresses. Develop well-defined work packages that can be used to track, and measure project performance based on earned value. Plan work in logical work groupings or packages and subdivide into smaller work groupings. Ensure that activities required to perform the 	Completed

	 work in each group are identified, defined, and dependent relationships established. Formalize the use of WBS elements by all project participants in their respective areas of responsibility and as an identification tool for project management performance measurement. Use the WBS in procurement/contracting activities and specify the WBS in contractor Requests for Proposals. Use the WBS for project costing and as a means to assess the impact of programmatic changes in funding levels on work content, schedules, and contractual support. Prepare cost estimates for each WBS element to assist budgeting and project validation. Integrate the WBS with PSEG Long Island's accounting systems, project cost management systems and schedule management systems. Integrate master work plans and detailed contractor schedules / activities to the WBS to permit integration of schedule information and to facilitate review of status reports and change proposals. Refine detailed project estimates initially prepared by WBS element and follow the manner in which the project work was planned, scheduled, estimated, funded and executed. 	
25	 Formalize and incorporate contingency management in capital project cost estimating and cost management. Formally report the expenditure of contingency funds separately from project estimates rather than inflate total project budget amounts. It is critical that reliable project budgets include contingency funds based on baseline estimates and their relative risks. In addition to project specific contingency elements, a contingency should also be established to address project scope changes and the need for unforeseen administrative or legal support. In order to audit contingency management, the following activities should be included: Review the project budgets and individual budget elements including management, design, construction and project specific contingencies. Determine whether contingency levels were appropriately evaluated and reviewed in each evolution of project estimating and each project stage. Relate contingency levels with recognized uncertainty and risks at specific levels of planning, design and construction. Evaluate project design for unforeseen conditions that might arise or be discovered during the design process and whether these conditions fall within the original project scope (i.e., the program requirements initially articulated by the user in the project definition stage). Establish and formalize project cost contingency to cover additional project detail such as unforeseen site conditions, interference, delays or other circumstances that would not have been known at initiation and expanded or changed project scope not identified during the scope definition phase. 	Completed
26	 Define and report project management performance measures that focus on the effectiveness of cost estimation, earned value and schedule management. Project progress reports should be timely and contain all information which is pertinent for their target audience. Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made. Have project managers actively monitor overall project progress against the baseline schedule and review cost versus progress and budget. Formalize project management performance reporting to LIPA and PSEG Long Island. 	Completed

	• Integrate cost and schedule systems with the project master schedule and the	
	approved project budget.	
	• Develop a baseline schedule for every capital project showing the logical relationships, duration, and timing of the WBS elements for engineering and	
	construction.	
	 Establish processes for systematic schedule preparation, review and analysis. 	
	 Periodically, perform analyses of the initial establishment of 	
	operation/completion dates.	
	 Construction delivery strategy – whether plans were developed and defined 	
	for construction contracting and long lead item equipment procurement.	
	 Phasing requirements – determining the proper sequence and phasing of all 	
	proposed construction work on the project to ensure that construction was	
	accomplished in the most economical manner while minimizing impact to	
	operations.	
	• Integration of design, procurement and construction activities - once phasing	
	was determined, whether all activities concerned with design, procurement,	
	construction, start- up and operation, and the entire scope of work was clearly	
	defined and integrated.	
	• Milestones – identification of important milestone dates establishing a basis	
	for the implementation of the project work plan.	
	Periodically reassess processes used to obtain actual project schedule data	
	used to determine the status of the project against key milestones, and the	
	accuracy of information on the progress of individual/critical project	
	elements.	
	• Formalize processes to address proposed and actual revisions to the project	
	schedule and use of the scheduling system to identify possible solutions for	
	schedule recovery.	
	 Highlight: Project cost variances 	
	- Project cost variances - Schedule variances	
	- Committed costs and actual costs to date	
	- Estimated costs and detail costs to date	
	- Capital budget impact	
	- Trends	
	- Pending and approved scope changes	
	- Earned value, or other measurements of cost and schedule	
	performance.	
	Work Management and Outside Services	Status
27	Develop an integrated a work management system covering all PSEG Long Island	
	operations, maintenance and construction resources that are based on engineered	
	time standards and cover routine operations, repetitive maintenance activities,	
	planned work, support requirements, and provide continuous feedback on workforce	
	effectiveness. The system should be in an easy-to-use format expressed in man-	
	hours, along with the combined employee and contractor capacity available to	
	perform the work, supported by real time reporting of capacity utilization. The	In-Progress
	system should include:	
	Documentation of work level versus resource histogram development and work plan process	
	work plan process.	
	 Enhanced methods to calculate workforce capacity and utilization. Expanded workforce capacity in reports. 	
	 Expanded workforce coverage in reports. Decumpentation of processing for establishing workforce levels 	
	 Documentation of processes for establishing workforce levels. Documentation of aritaria for adding contractor consolity. 	
	Documentation of criteria for adding contractor capacity.	

	• Establish real time variance reporting for O&M and project costs.	
	Additional decision-making information to work plan	
28	Fill gaps in the current management information reporting and organizational	
	reporting relationships to support an integrated work management system.	
	• Develop formal reports on trends in work load levels, workforce	
	productivity and utilization. The analysis of these trends identifies areas	
	that are performing well, where improvements are needed, and is a	
	foundation for the development of strategies to improve work force	
	performance.	
	 Establish formal processes to use work management data for annual 	
	resource planning as part of the annual business planning activities of	
	PSEG Long Island operations and maintenance.	
	Develop formal work management practices for PSEG Long Island	
	engineering and design functions. The work management systems should	
	have appropriate system tools to support the various individual and distinct	In-Progress
	engineering functional processes. Elements that should be formalized	
	include:	
	- Scheduling	
	- Prioritization and planning	
	- Resource allocation and leveling	
	- Performance measurement	
	- Budget planning and control	
	 Vendor tracking Document/drawing control 	
	- Records management	
	- Procurement management	
	- Time reporting	
29	Develop overtime targets for PSEG Long Island operations and maintenance	
2)	organizations based on economic analyses and verified industry norms.	Completed
	organizations based on economic analyses and vermed measury norms.	completed
30	Add KPIs for management positions. Review the design of monitoring and	
	controlling reports to improve their usefulness.	Completed
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	Customer Operations	Status
31	At the time of the next bill redesign, revise bill formats to include missing	
51	information required by 16 NYCRR Parts 11 and 13 (e.g., definition of kW, late	Completed
	payment date line and an explanation as to how the bill can be paid).	Completed
32	Issue denial of service notices as required by 16 NYCRR Parts 11 and 13. Offer	
52	payment arrangements, as required by Part 11.	Completed
	payment analysinents, as required by rate 11.	completed
33	Revise the processes used by PSEG Long Island to respond to complaints received by	
	the DPS as follows:	
	• Create a case file checklist to include in case files to ensure documentation	
	is complete.	
	• Develop an integrated program management approach to ensure customers	
	are provided information on all programs available to them. One approach	
	would be to create customer profile worksheet with cross reference to	Completed
	applicable programs and/or relevant protections.	
	• Eliminate practice of hand calculations and implement use of excel	
	template calculators. Modify the "DPS Complaint Response Form" to	
	include:	
	- Time and date customer complaint was created	
	- Applicable customer contact timeline (e.g. 2-hour, next day etc.)	

	 Time and date customer was contacted Any special protections or customer assistance programs the customer was referred to Date form submitted to DPS. Implement a process to ensure PSEG Long Island includes copies of the DPS customer close out letters in the case files. 	
34	 Modify the CTS system to improve DPS complaint tracking and reporting ability. Add data fields including: The original source of complaints referred by DPS (i.e., direct from customer, Consultant, Government Official/Executive Correspondence). Customer contact deadline. Closeout deadline. Resolution status field to differentiate between cases that are "Resolved and Closed" vs "Unresolved and Closed" Indication the case is "Pending completion of future work" to allow for active follow-up. Modify the Date Opened field to allow for capturing of time of day a case is created. Modify Date Contacted field (default time of day set at 0:00) to force user to adjust time. Adjust internal processes to ensure data entry into this field. 	Completed
35	 Implement a Quality Assurance Program in Customer Relations. Recommended items for review include: Data is entered in CTS CAS diary entry includes the time customer contact occurred Case files are completed Appropriate tools and methodology are being used to calculate adjustments Consistent treatment of customers with similar issues Customers complaint concerns appropriately addressed DPS Complaint Response Form is used to track response to DPS cases. 	Completed
	Outreach and Communications	Status
36	Measure the effectiveness of capital-project outreach, media relations and external affairs programs, to determine whether outreach efforts are cost- efficient, on target, and achieving results. Potential measurement options include surveys, focus groups, a media clip index, or attendance at public meetings.	Completed
37	On a pilot basis, evaluate the potential use and effectiveness of text messages and phone calls to customers on scheduled tree trim routes.	Completed
38	Measure the effectiveness of energy efficiency and low-income program outreach and marketing efforts.	Completed
39	Develop a more formalized process for determining the outreach budgets for capital projects, particularly Tier 3 and high scoring Tier 2 projects.	Completed
40	Update the External Affairs Handbook to reflect recent lessons learned, the findings in NorthStar's report, the items cited below, and the other recommendation cited in this chapter. • Expand the discussion of project scoring.	Completed

45	Develop and adhere to a schedule for completion of the annual metric identification and target setting process that provides for a final list of approved metrics at the beginning of the measurement year. Tier 1 Metrics, definitions, weightings and targets should be set no later than February 28. There should be a final sign-off on	Recurring
4-7	Performance Management	Status
44	 Increase the specificity of capital project-related outreach: Include more specific, detailed project information on public information meeting letters and notices. All outreach materials (i.e., fact sheets and customer letters) resulting in additional poles, pole changes, a shift from underground to overhead cables should indicate such and provided detailed description. Consider increased use of pictures and renderings in outreach materials, particularly the reliability web pages. Add a link to PSEG Long Island's reliability web page on all outreach materials, particularly customer letters. Include dates materials were added to the reliability project pages of PSEG Long Island's website. Consider an icon for "Upcoming projects in your neighborhood" or the equivalent to the www.psegliny.com landing page. Include community/public meeting presentations on the reliability pages of PSEG Long Island's website. 	Completed
43	Document meetings (date, attendees, topics discussed, takeaways) with impacted officials as required by the External Affairs Handbook.	Completed
42	 Develop formal public outreach plans for each Tier 3 project (i.e., not a spreadsheet). At a minimum the plans should include the following, and should be updated as the project or anticipated outreach requirements change: Description of the project, including timeline and key milestones Checkpoints to identify any significant changes in project scope or timing Scoring sheets and a discussion of key concerns and how to mitigate them Discussion of alternatives considered Project budget and detailed outreach budgets Anticipated frequency of communications/timeline planned outreach activities and materials. 	Completed
41	 For all Tier 3 projects, update constituents as the project approaches its start date, or if there are significant project changes (e.g., scope, schedule, location/route, duration, or other item likely to impact the community such as overhead versus underground, pole heights, additional poles, traffic, outages). This is in addition to the annual update on the 5-year capital plan. Formalize the External Affairs training and enhance it to include the following: Outreach expectations and requirements (e.g., frequency and information to be communicated) Scoring methodology and application of the scoring rubric in a consistent, objective manner Documentation requirements The External Affairs Handbook and other policies and procedures Communication with the DPS When various outreach activities/communications methods are required or should be employed Developing budgets for capital project outreach. 	Completed

	all of the aforementioned elements. Note: This is not intended to imply that the metric book must be completed by February 28; however, it should be done in an expeditious manner.	
46	 PSEG Long Island and LIPA should streamline its process to facilitate the establishment and measurement of meaningful operational metrics to monitor performance, incorporating DPS staff input, and potentially bifurcating the Tier 2 metrics. This might expedite the finalization of the Tier 1 metrics. Examples include: Establish a smaller group of Tier 2 metrics used to test metrics for possible inclusion as a Tier 1 metric or to continue to monitor performance when a Tier 1 metric has been moved to a Tier 2 metric. Establish a separate classification of metrics to be used to monitor performance in specific areas or for operational reporting. These metrics would not be tied to compensation and could then be used to address such items as the following: Changes in regulatory requirements or NYS initiatives (e.g., Reforming the Energy Vision, Clean Energy) Elements of LIPA's Strategic Plan, Utility 2.0 or the IRP. AMI implementation status Issues identified by internal or external audits, including performance deficiencies identified by NorthStar's audit. Operational changes or revised priorities. Tracking new initiatives or sub-elements of existing initiatives. As examples, a number of the Tier 2 metrics used over time would more appropriately have been part of this category: social media followers, staffing levels permanent, percent of financial management reports delivered to LIPA. 	Completed
47	LIPA and PSEG Long Island should continue to evaluate how to best incentivize service provider performance (Tier 1 metrics), drive continuous improvement and align the metrics with the focus of LIPA and PSEG Long Island's long-term strategy/operational needs and industry best practices.	Recurring
48	Define the metric calculation methodology to specify whether service restorations completed in exactly two hours should be included in the ETR Accuracy performance metric. NorthStar found the specified calculation methodology open to some interpretation. Currently, PSEG Long Island does not include restoration times of exactly two hours. This should be reconciled between PSEG Long Island and LIPA.	Completed
	Fuel and Purchased Power	Status
49	Memorialize the process regarding PSEG Long Island conflict of interest in regional market activities (discussed in Section 4.18 of the A&R OSA) in the Contract Administration Manual (CAM).	Completed
	Pension and OPEB	
	None	
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B. Tracking and Close-out of 2013 Audit Recommendations

Part of the scope of NorthStar's audit was a review of progress towards implementing 83 recommendations made in its June 2013 audit report, which was issued nearly simultaneously with passage of the LIPA Reform Act and prior to finalization of the Amended & Restated Operations Services Agreement (A&R OSA) with PSEG Long Island, which became effective on January 1, 2014. Recommendation No. 1 of the Final Report provides: "LIPA and PSEG [Long Island] should work with the DPS to determine which of the outstanding recommendations from the 2013 [Final Report] are still relevant and should be implemented."

Accordingly, project management staff at LIPA and PSEG Long Island met with DPS beginning in August 2018 to exchange views on the best way to track and close out the remaining 2013 findings. Both LIPA and PSEG Long Island viewed most of the remaining 2013 items as overlapping with recommendations in the 2018 audit. DPS reviewed additional documentation provided since conclusion of the audit and agreed with respect to recommendations 5.4.2 and 5.4.3 in the 2013 audit that those recommendations have been or are near completion. Accordingly, they will be regarded as closed and not reported further. As for the remaining 2013 recommendations, DPS has reviewed and approved the table below subject to on-going progress review and comment. Accordingly, the remainder of the 2013 recommendations identified by NorthStar will be addressed by reference to 2018 implementation plans as follows:

2013 Audit Recommendation No.	Recommendation	NorthStar 2018 Comments	Implemented under 2018 Recommendation No.
9.4.2	To the extent practical the system planning function should justify capital improvement projects based on cost/benefit analysis in addition to and engineering needs analysis.	Ongoing: Only a certain number of capital improvement projects can be quantified on a cost/benefit analysis.	14 Completed
10.4.4	Define project management performance measures focusing on the effectiveness of cost estimation and scheduling. Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made.	Ongoing: PSEG Long Island continues to develop and implement performance measures focusing on the effectiveness of cost estimates and project scheduling.	26 Completed
10.4.5	Utilize a Work Breakdown Structure (WBS) in the initial phases of the project justification and conceptual estimating and continue their refinement as the project progresses.	Ineffective: PSEG Long Island does not use an industry accepted WBS.	24 Revised

Summary of 2013 Findings with Reference to 2018 Implementation Plans

10.4.6	Address the deficiencies in project estimating by making organizational and process improvements and creating a capital project estimating function/organization equipped with appropriate tools.	Ongoing: PSEG Long Island is improving the process but presently does not accurately estimate projects. Poor estimating results in poor project management decisions.	23 Completed
10.4.7	Develop a capital project cost forecasting/trending capability.	Ongoing: As noted above.	26 Completed
10.4.8	Incorporate contingency management in capital project cost estimating and cost management.	Ineffective: Poor project estimates are increased with a risk and contingency factor ranging from 40 percent for an office level estimate to 10 percent for a definitive estimate. These factors artificially inflate project estimates as the factors appear unsubstantiated.	25 Completed
10.4.10	Improve periodic capital progress reporting.	Ongoing: The procedures developed to date address many components of capital project delivery and will continue to support project management and control.	26 Completed
10.4.11	Improve capital project document control.	Ongoing: Procedures developed to date identify [documentation] but implementation will continue.	20 Completed
10.4.12	Perform capital project schedule management.	Ongoing: PSEG Long Island's project schedule management will continue to improve.	26 Completed

12.4.2	Develop and implement a rigorous procedure that requires a thorough analysis and direct comparison of the costs of repairing versus replacing T&D system equipment. While other factors, such as system reliability, should be analyzed as well, LIPA should be aware of the cost- effectiveness of each project or program, and the impact it will have on customer costs.	Ongoing: PSEG Long Island has a reasonable approach to repair/replace decision- making, but it does not yet include cost-benefit analyses.	18 In-Progress
12.4.3	Establish an asset management model that supports the LIPA T&D preventive maintenance program.	Ongoing: PSEG Long Island recently created an Asset Strategy group in late 2016 to provide increased support to the preventative maintenance programs. Full implementation is expected in 2020.	18 In-Progress
13.4.1	Develop an integrated work management system that formalizes planned work, support requirements, and provides continuous feedback on workforce effectiveness.	Ineffective: PSEG Long Island does not yet use work management systems to effectively plan, monitor and control the work of major work force groups.	27 In-Progress
13.4.2	Fill gaps in the current management information reporting and organizational reporting relationships to support an integrated work management system.	Ineffective: PSEG Long Island does not yet use work management systems to effectively plan, monitor and control the work of major work force groups.	28 In-Progress
15.4.4	Develop a comprehensive, coordinated communications, government and public affairs strategy and associated policies/procedures.	Ongoing: Communications are performed by a number of organizations. External Affairs developed a handbook for reliability projects and adopted a more proactive approach; however, additional improvements are possible as discussed in [the Final] Report.	42 and 44 Completed

15.4.5	Communicate issues of significance to customers regularly and in a timely manner.	Ongoing: Improvements are warranted in the area of capital projects.	40 and 44 Completed
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C. <u>Prioritization, Status and Progress Reporting</u>

Besides its final report, NorthStar prepared and issued an Appendix A consisting of its own preliminary Cost-Benefit Analyses of each of the 49 recommendations and ranked each as: High, Medium or Low. LIPA and PSEG Long Island adopted the following definitional criteria for each rank designation:

Priority	Description
Low Risk/Benefit	Requires routine management attention and largely utilizes existing practices and resources.
Moderate Risk/Benefit	Requires some additional management attention to implement new or enhanced practices or commit modest additional resources, and is anticipated to provide operational, fiscal or customer service benefits commensurate with the resource commitment.
High Priority Risk/Benefit	Requires significant management attention, process change or resources and is anticipated to result in quantifiable operational, fiscal or customer service benefits commensurate with the resource commitment.

Annual progress reports on all recommendations are to be filed with the LIPA Board of Trustees and DPS each September. <u>See</u> LIPA Board of Trustees Resolution, #1420, amended July 25, 2018. Additional interim reports are also made to the Board by LIPA staff. Finally, the instant progress report is issued publicly and to DPS pursuant to audit recommendation number 2, and in a format similar to reporting by IOUs. Progress reports are filed tri-annually each February, June and October.

Additionally, LIPA and PSEG Long Island provide DPS staff additional information regarding implementation as requested.

D. <u>Conclusion</u>

LIPA and PSEG Long Island recognize that effective implementation plans must remain flexible enough to evolve and improve as implementation efforts and circumstances may require. We continue to collaborate with DPS staff to evaluate each implementation plan, incorporate lessons-learned from ongoing implementation efforts, and modify plans as necessary. All modifications are reported to the Board of Trustees and DPS.

Recommendation:

LIPA and PSEG Long Island should work with the DPS to determine which of the outstanding recommendations from the 2013 are still relevant and should be implemented.

1

Assigned LIPA Staff:

James Miskiewicz, Deputy General Counsel

LIPA Executive:

Anna Chacko, General Counsel

Objectives and Assumptions of the Recommendation:

The Management Audit Report found that 17 of the 83 recommendations made during the 2013 audit remained in progress. The current recommendation from the 2018 report recognized that not all of the outstanding recommendations remain relevant given intervening developments such as the LIPA Reform Act and changes to the operating models and responsibilities of LIPA and PSEG Long Island. Accordingly, the purpose of this recommendation is to document completion of all recommendations remaining from the 2013 management audit wherever still relevant in view of DPS, the Authority and PSEG Long Island. By working with DPS staff, LIPA and PSEG Long Island will evaluate and jointly come to agreement which 2013 recommendations remain in need of further progress to be reported upon separately and/or which action plans are better addressed through new 2018 recommendations.

Deliverable:

The initial implementation plan to be filed with the LIPA Board of Trustees and DPS on October 24, 2018 will specify which 2013 recommendations are deemed still relevant, include timetables for completion, and/or identify those which will be shifted for incorporation into action plans to implement 2018 recommendations

Deliverables/Milestones	Due Date	Status	Comments
LIPA and PSEG Long Island meet	8/15/2018	Completed	DPS staff have agreed that all
with DPS staff and present proposal			remaining 2013 audit
on how to address outstanding 2013			recommendations were either
recommendations within the context			completed, or would be
of 2018 implementation plans			implemented through new 2018
	-		recommendations as set forth
			above at pages xiii through xvi:
			"Summary of 2013 Findings
			with Reference to 2018
			Implementation Plans" (Table).
PSEG Long Island and LIPA senior	9/17/2018	Completed	
leadership meet to review, revised			
action plans for all remaining 2013			
recommendations			
	_		

Assigned PSEG Staff:

Andrea Elder-Howell - Executive Sponsor; Michael Ennis - Team Leader

Ranking:

Moderate

Item Status Completed

	10/1/2019 Committeed
Revised draft implementation plans	10/1/2018 Completed
submitted to DPS staff for review	
and comment	
LIPA and PSEG Long Island senior	10/11/2018 Completed
leadership meet to discuss revisions	
to plans	
DPS to make final comments on	10/12/2018 Completed
previously-submitted proposals to	
incorporate 2013 recommendations	
into 2018 implementation plans.	
Any 2013 matters deemed more	
appropriately addressed separately	
will be broken out, reported and	
tracked separately.	
Action plan for all 2018 and	10/24/2018 Completed
outstanding 2013 recommendations	
publicly filed with LIPA Board and	
DPS	

LIPA and PSEG Long Island estimate that costs to determine current relevance of previous audit recommendations will be nominal whereas the benefit will be to better focus on and clarify implementation of current recommendations.

Recommendation:

LIPA and PSEG Long Island should develop an implementation plan for all audit recommendations (new recommendations and outstanding recommendations that LIPA, PSEG Long Island and DPS determine remain relevant) within 90 days of the Final Audit Report acceptance and submit the implementation plan to the LIPA Board of Trustees and the DPS. The Report could take the form required of the IOUs.

Item Status Recurring reports

2

Assigned LIPA Staff:	Assigned PSEG Staff:
James Miskiewicz, Deputy General Counsel	Andrea Elder-Howell - Executive Sponsor; Michael Ennis - Team Leader
LIPA Executive:	Ranking:
Anna Chacko, General Counsel	Moderate

Objectives and Assumptions of the Recommendation:

The objective is to develop and maintain a system to contemporaneously document development of implementation plans for each recommendation in the management audit and to track progress in implementing each recommendation in the 2018 audit as well as those deemed active from the 2013 audit. The system assigns team leaders for each recommendation, assesses scope, objectives and cost-benefit analyses, projected timetables and milestones for achievement of completion and serves as a measure of overall progress. The system will form the basis of periodic progress reporting to the LIPA Board of Trustees and DPS, and ultimately serve as a record for implementation for future management audits as required by the Public Authorities Law.

Deliverable:

File implementation plan with the LIPA Board of Trustees and DPS on October 24, 2018. File implementation plan progress reports pursuant to the Board's Audit Relationships Policy as implementation action plans require.

Deliverables/Milestones	Due Date	Status	Comments
LIPA & PSEG Long Island meet	7/16/2018	Completed	
and agree on implementation plan			
format			
Brief LIPA Board and submit	7/25/2018	Completed	
resolution to implement audit			
recommendations			
Implementation plan & tracking	7/30/2018	Completed	
schedule finalized			
All draft LIPA & PSEG Long Island	9/7/2018	Completed	
implementation plans due on LIPA			
SharePoint platform today			

PSEG Long Island and LIPA senior	9/17/2018 Completed
leadership meet to discuss approval	· ·
and/or revisions to draft	
implementation plans	
Revised implementation plans due	10/1/2018 Completed
on SharePoint tracker	· ·
LIPA & PSEG Long Island senior	10/11/2018 Completed
leadership approve implementation	· ·
plans for each 2013 and 2018	
recommendation	
Comments on draft implementation	10/12/2018 Completed
plans received from DPS staff	
Implementation Plan "book"	10/12/2018 Completed
compiled, disseminated to Board of	· ·
Trustees and DPS	
Management Audit Implementation	10/24/2018 Completed
Plan publicly presented to Board	
and DPS; posted on websites	
Progress reports submitted to LIPA	9/30/2019 Completed See also Recommendation No. 3
Board of Trustees, posted on LIPA	
website and filed with DPS	
Progress reports submitted to LIPA	9/30/2020 Completed
Board of Trustees, posted on LIPA	
website and filed with DPS	
Progress reports submitted to LIPA	9/30/2021 Recurring
Board of Trustees, posted on LIPA	reports
website and filed with DPS	
Progress reports submitted to LIPA	9/30/2022 Recurring
Board of Trustees, posted on LIPA	reports
website and filed with DPS	
Progress reports submitted to LIPA	9/30/2023 Recurring
Board of Trustees, posted on LIPA	reports
website and filed with DPS	

The cost to develop an implementation plan is nominal. The development of a plan will ensure the audit recommendations will be implemented in a timely manner. Documentation and tracking of progress, in conjunction with regularly reporting to the Board, DPS and the public serves the Authority and PSEG Long Island's values of transparency to stakeholders. The system will also aid in producing records of implementation more efficiently for the next management audit.

Item Status Recurring reports

Recommendation:

LIPA Internal Audit should perform a comprehensive audit of the implementation status of all audit recommendations annually until the next DPS audit is performed. The results of LIPA's audit should be submitted to LIPA executive management, the LIPA Board of Trustees, PSEG Long Island, and the DPS. Within each LIPA audit:

• an evaluation of progress performance should be included.

• a progress tracking document should show activities completed to date and those in process.

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• any revisions to completion targets should be highlighted for management review.

Assigned LIPA Staff:	Assigned PSEG Staff:
Kathleen Mitterway, Senior Advisor for Audit	Rocky Shankar, Internal Audit Manager
LIPA Executive:	Ranking:
Kathleen Mitterway, Senior Advisor for Audit	High

Objectives and Assumptions of the Recommendation:

The objective of this recommendation is to ensure that the 2013 & 2018 NorthStar Recommendations and Management Action Plans have been effectively implemented.

Consistent with the LIPA Board of Trustee's Policy on Audit Relationships, LIPA Internal Audit will perform a comprehensive audit of the implementation status of all audit recommendations annually until the next DPS audit is performed. The results of this analysis will be submitted to LIPA executive management, the LIPA Board of Trustees, PSEG Long Island, and the DPS.

Within each LIPA audit: an evaluation of progress performance will be included; a progress tracking document will show activities completed to date and those in process; any revisions to completion targets will be highlighted for management review.

The Authority's Chief Executive Officer, together with PSEG Long Island, will submit an annual report to the Oversight Committee of the Board and the Department of Public Service of the status of the implementation plan and the results of the annual audits.

That annual report will include a summary of the activities completed to date and any revisions to completion targets. The annual report will be reviewed by Internal Audit for completeness prior to submission. The Oversight Committee will report significant matters to the Board.

Internal Audit will review the effectiveness of the implementation plan in addressing each audit recommendation after the completion of the plan for that recommendation.

Deliverable:

Annual Report to the Oversight Committee of the Board and the Department of Public Service of the status of the implementation plans and the results of the annual audits. After each annual

audit, LIPA Internal Audit will review any audit observations relative to the implementation plans for consistency between the plans and the Management Audit findings and recommendations.

Deliverables/Milestones	Due Date	Status	Comments
Authority's CEO, together with	9/30/2019	Completed	
PSEG Long Island, will submit an			
annual report to the Oversight			
Committee of the Board and the			
DPS of the status of the			
implementation plan and the results			
of the annual audits			
Authority's CEO, together with	9/30/2020	Completed	
PSEG Long Island, will submit an			
annual report to the Oversight			
Committee of the Board and the			
DPS of the status of the			
implementation plan and the results			
of the annual audits			
Authority's CEO, together with	9/30/2021	Recurring	
PSEG Long Island, will submit an		reports	
annual report to the Oversight			
Committee of the Board and the			
DPS of the status of the			
implementation plan and the results			
of the annual audits			
Authority's CEO, together with	9/30/2022	Recurring	
PSEG Long Island, will submit an		reports	
annual report to the Oversight			
Committee of the Board and the			
DPS of the status of the			
implementation plan and the results			
of the annual audits			
Authority's CEO, together with	9/30/2023	0	
PSEG Long Island, will submit an		reports	
annual report to the Oversight			
Committee of the Board and the			
DPS of the status of the			
implementation plan and the results			
of the annual audits			

There are no direct cost or benefits associated with the audit of the implementation of recommendations. Each recommendation has specific benefits as specified in the individual CBAs.

4 **Item Status** Completed

Recommendation:

LIPA Financial Oversight should formally document the results of its activities and annual assessment with presentation to PSEG Long Island and LIPA executives and Department of Public Service (DPS)

Assigned LIPA Staff:	Assigned PSEG Staff:
Donna Mongiardo, Vice President - Controller	0 - None
LIPA Executive:	Ranking:
Ken Kane, Senior Advisor to Operations Oversight	Moderate

Objectives and Assumptions of the Recommendation:

The objective of this task is to improve the documentation of work performed by LIPA Financial Oversight staff. This documentation will also improve the lines of communication and understanding of outcomes between LIPA and PSEG Long Island.

Deliverable:

Annual report summarizing LIPA Financial Oversight work performed and outcome or agreement with PSEG Long Island of such projects.

Deliverables/Milestones	Due Date	Status	Comments
Form a LIPA oversight SharePoint	9/30/2018	Completed	
documentation team			- -
Coordinate annual oversight report	12/31/2018	Completed	Completed on the revised due
format including details such as			date of 4/30/2019.
work product and timeline, with			
team			
Provide year end summary of 2018	12/31/2019	Completed	
annual report to DPS, LIPA and			
PSEG Long Island management			
teams			
Distribute draft report for 2018 to	12/31/2019	Completed	
Senior Management at LIPA and			
PSEG Long Island and DPS for			
review			
Issue subsequent years report to	4/30/2021	Completed	
DPS, LIPA and PSEG Long Island			
management teams			

Additional time of LIPA staff will be required as a more coordinated effort of documentation will be necessary. In addition, consistent formatting and development of a template will require additional modifications to SharePoint.

The benefit of this implementation plan is improved transparency and communication.

LIPA should formally request appointments or confirm extensions to Board member term periods at least six months prior to term expirations.

Assigned LIPA Staff:	Assigned PSEG Staff:
Jason Horowitz, Assistant General Counsel and Assistant Secretary to the Board	0 - None
LIPA Executive:	Ranking:
LIPA Executive: Bobbi OConnor, Chief Administrative Officer & Board Secretary	Ranking: Low

5

Objectives and Assumptions of the Recommendation:

The LIPA Board of Trustees has nine members. Five are appointed by the Governor, two by the Speaker of the Assembly, and two by the Senate Majority Leader. The objective of this recommendation is to reduce the potential for vacancies or expired terms on the LIPA Board of Trustees by sending the appointing authorities notice of an expiring Trustee term at least six months prior to the expiration. The appointing authorities also track Trustee terms.

Deliverable:

Deliverables/Milestones	Due Date	Status	Comments
Prepare schedule of trustee term	6/29/2018	Completed	
expiration dates			·
Trustees review the competencies	10/24/2018	Completed	
and expectations to be sent to the			
appointing authorities by the Board			
Chair, per the Board's Policy on			
Governance and Agenda Planning			
Board Chair sends letter to	6/30/2019	Completed	Documentation sent 6/14/2019.
appropriate appointing authority for			
Trustee terms expiring 12/31/2019			
Board Chair sends letter to	6/30/2020	Completed	
appropriate appointing authority for			
Trustee terms expiring 12/31/2020			
Board Chair sends letter to	6/30/2021	Recurring	
appropriate appointing authority for		reports	
Trustee terms expiring 12/31/2021			
Board Chair sends letter to	6/30/2022	Recurring	
appropriate appointing authority for		reports	
Trustee terms expiring 12/31/2022			

Cost Benefit Analysis:

The costs to implement this recommendation are nominal and consistent with prior practice.

Recommendation:

LIPA and PSEG Long Island should continue to develop an effective, comprehensive ERM process.

6

Assigned LIPA Staff:

Corey Horowitz, Director of Risk Management

LIPA Executive:

Bobbi OConnor, Chief Administrative Officer & Board Secretary

Objectives and Assumptions of the Recommendation:

The ERM Team prepared an action plan road map to implement this recommendation. Since the recommendation is broad and subject to interpretation of what an "effective" and "comprehensive" ERM process is, the ERM Team based its plan on the Committee Of Sponsoring Organizations ("COSO") framework and included an annual maturity assessment from an external consulting firm (e.g. Corporate Executive Board or "CEB"). The assessment will provide a measure of progress and identify areas of opportunity for further enhancement of our ERM program based on best-in-practice recognized industry standards. The action plan should reduce any subjectivity during future DPS Management Audits on the progress achieved.

Deliverable:

Deliverables/Milestones	Due Date	Status	Comments
Perform a periodic ERM Maturity	7/31/2018	Completed	
Assessment Review - Initial		~	I
Review, and if necessary, propose	9/27/2018	Completed	
revisions to the LIPA ERM Board			
Policy Statement	10/21/2010		
Identify a risk liaison per line of	12/31/2018	Completed	LIPA and PSEG Long Island
business to help increase risk			VP/Executives assigned an individual from their
awareness (identify Risk Liaisons			department/line of business to
for LIPA Departments and PSEG			assist the ERM team in
Long Island lines of business -			coordinating and facilitating
Customer Operations, Electric			ERM risk discussion meetings.
Operations, Power Markets, and			Each risk liaison assists in
Business Services)			organizing meeting dates and
			attends ERM department
			meetings.
			incenings.

Assigned PSEG Staff:

Item Status In Progress

Laurent Pommier - Executive Sponsor; Ted Repetti - Team Leader

Ranking:

Moderate

Establish process to integrate ERM	2/15/2019 Completed	The integration of ERM
information/findings into the LIPA		information into LIPA's
Strategic Planning process.		Strategic Planning Process was
	· · · · · · · · · · · · · · · · · · ·	completed.
Review of the LIPA/PSEG Long	6/30/2019 Completed	1
Island joint ERM Procedures		
Manual (internal document)		
Develop prioritized portfolio view	6/30/2019 Completed	1
of all enterprise/corporate risks		
Review risk profile with each	6/30/2019 Completed	1
department V.P. for consensus		
Establish a framework and identify	6/30/2019 Completed	1
emerging risks		
Develop risk reporting framework	6/30/2019 Completed	E E E E E E E E E E E E E E E E E E E
for department, organization, and		
Board reporting (frequency and		
depth)		
Perform second annual ERM	7/31/2019 Completed	Completed Gartner/CEB ERM
Maturity Assessment - Review		Maturity Assessment
Introduce velocity as an additional	12/31/2019 Completed	E E E E E E E E E E E E E E E E E E E
component in assessing risk		
Perform deep-dive analysis on key	6/20/2020 Completed	1
enterprise/corporate risks		
Document response strategy and	6/30/2020 Completed	1
current mitigation actions for top		
enterprise/corporate risks		
Perform third annual periodic ERM	7/31/2020 Completed	ERM Team from LIPA and
Maturity Assessment Review		PSEG Long Island completed
-		the 3rd ERM Maturity
		Assessment via Gartner on June
		17, 2020.
Establish a framework to monitor	12/31/2020 Completed	1
and measure the effectiveness of		
risk mitigation/reduction efforts		
Perform fourth annual periodic	7/31/2021 Not Started	
ERM Maturity Assessment Review		
Integrate updated and revised risk	7/31/2022 In Progress	s On-going process.
data into the business planning		
cycle to help prioritize O&M,		
capital and resource allocations		
Perform fifth annual periodic ERM	7/31/2022 Not Started	
Maturity Assessment Review		

ERM has been an on-going effort since 2015 and so there are no additional costs associated with implementing this recommendation. Moreover, as the ERM program matures, risk management will become a routine part of the organization's operations. It is difficult to quantify the benefits of ERM. While many potential risks have a financial impact, and ERM may contribute to avoided costs by mitigating risks, these costs are not easily quantified. As these ERM activities were planned and on-going prior to the audit, there is no material additional cost to implementing the recommendation.

Item Status Completed

Recommendation:

Continue to develop and implement the SOS capital program optimization model.

7

- Implement improvements identified by PSEG Long Island and LIPA Internal Audit, including:
- Review and adjust the project description questions.
- Add a demographic category for "permitting required", which can act as a flag of sorts when running optimization scenarios.
- Flag projects that are necessary to remediate a violation or to prevent a violation.
- Review the scoring criteria for each business area when setting up a new project in SOS.
- Identify any biases toward certain types of projects.
- Refine the Strategic Objectives and the Success Criteria. Consider including Success
- Criteria not used for the 2018 budget, such as NPV and the financial risk of deferral.
- Expand the use of SOS to other business areas, including IT and Customer Operations.
- Include a step in the SOS optimization process to calibrate value and risk scoring across business units that develop capital projects such as Network Strategy Planning group, Electric Operations, and Reliability Management. IDA should lead a process to review the scoring of projects with similar risk values to ensure the projects are scored on a comparable basis. Similarly, IDA should ensure the different organizations use comparable bases for value scoring the projects using the Strategic Objectives and the Success Criteria.

Assigned LIPA Staff:

Assigned PSEG Staff:

Cicalo - Team Leader

Ranking: Moderate

John O'Connell - Executive Sponsor; Joe

Michael Simione, Director of Transmission and
Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective is to improve the value of selected investments through improved use of the Spend Optimization Suite (SOS) system, which is a software application provided through an outside consultant. The recommendation aims to implement the recommendations from the 2017 LIPA audit of the SOS process, as well as further improvements in the SOS system and process. This implementation plan also addresses Recommendation 9.4.2 of the 2013 audit.

Deliverable:

Review and implement, as described below, the following enhancements of the SOS system/process:

- Review and adjust the project description questions.
- Add a demographic category for "permitting required, "which can act as a flag

of sorts when running optimization scenarios.

- Flag projects that are necessary to re-mediate a violation or to prevent a violation.
- Review the scoring criteria for each business area when setting up a new project in SOS.
- Identify any biases toward certain types of projects.
- Refine the Strategic Objectives and the Success Criteria. Consider including Success Criteria not used for the 2018 budget, such as NPV and the financial risk of deferral.
- Expand the use of SOS to other business areas, including IT and Customer Operations.
- Include a step in the SOS optimization process to calibrate value and risk scoring across business units that develop capital projects such as Network Strategy Planning group, Electric Operations, and Reliability Management. Investment Delivery Assurance (IDA) should lead a process to review the scoring of projects with similar risk values to ensure the projects are scored on a comparable basis. Similarly, IDA should ensure the different organizations use comparable bases for value scoring the projects using the Strategic Objectives and the Success Criteria.
- Analyze the potential to expand the use of SOS to other business areas, including Power Markets and Utility 2.0. Provide recommendation.

Deliverables/Milestones	Due Date	Status	Comments
Review and adjust the project	6/30/2018	Completed	
description questions; category for			
"permitting required"; flag projects			
necessary to re-mediate or prevent			
violation			
Identify any biases toward certain	7/31/2018	Completed	
types of projects			
Review the scoring criteria for each	7/31/2018	Completed	
business area when setting up a new			
project in SOS			
Refine the Strategic Objectives and	8/31/2018	Completed	
the Success Criteria. Consider			
including Success Criteria not used			
for the 2018 budget, such as NPV			
and the financial risk of deferral			

Include a step in the SOS	5/31/2019	Completed
optimization process to calibrate		
value and risk scoring across		
business units that develop capital		
projects such as Network Strategy		
Planning group, Electric		
Operations, and Reliability		
Management		
Expand the use of SOS to other	6/30/2019	Completed
business areas, including IT and		
Customer Operations		
Analyze the potential to expand the	7/1/2019	Completed
use of SOS to other business areas,		· · ·
including Power Markets and		
Utility 2.0		

Internal resources and the UMS group (SOS vendor) consultants were utilized in order to satisfy the implementation of the recommendation. PSEG Long Island has a software support services agreement with UMS group. There is an annual fee of \$35,000 for this service agreement. Projected costs were significantly reduced for the Spend Optimization Suite (SOS) enhancements by using PSEG Long Island Investment Delivery Assurance (IDA) resources and UMS consultants to utilize the hours for the software support services agreement.

There are many qualitative benefits by extending the use of SOS to the other business areas. It will provide consistency and transparence in the project selection process across all business areas. Also, it will allow the entire organization to make smarter project selection decisions, primarily through rationalization and alignment of spend to strategic and operational value and management of risk.

Risk Analysis:

There will a learning curve from the other business areas before SOS can be in full operation. At least one budget cycle might be necessary for a full implementation and final adjustment.

Customer Benefit Analysis:

Successful completion of this item will improve the quality of the capital budget process. This will improve the quality by optimizing the use of funds which will translate into less of a bill impact as funds are more effectively deployed. Therefore, it will provide more transparency for the customers and all the stakeholders.

Recommendation:

Provide LIPA-specific capital budget versus actual expenditure variance data to the Board of Trustees in each Finance and Audit Committee package.

Assigned PSEG Staff: Assigned LIPA Staff: Donna Mongiardo, Vice President - Controller 0 - None **LIPA Executive: Ranking:** Low Ken Kane, Senior Advisor to Operations Oversight

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Objectives and Assumptions of the Recommendation:

Provide Finance and Audit Committee of the Board of Trustees with LIPA-specific capital spending during the year.

Deliverable:

Capital spending for LIPA included in the monthly Finance and Audit Committee presentation.

Deliverables/Milestones	Due Date	Status	Comments
Include LIPA capital spending	9/24/2018	Completed	
versus actual in Finance and Audit			
Committee book			

Cost Benefit Analysis:

There is no additional cost of this addition to the Finance and Audit Committee book. The benefit is improved transparency related to LIPA capital spending and the status of proposed projects.

Item Status Completed

Recommendation:

Update the PSEG Long Island budget procedure to include the determination of incremental operations and maintenance (O&M) expenses associated with new construction.

Assigned LIPA Staff:	Assigned PSEG Staff:	
Gerard E. Ring, Director of Budget and Financial	Margaret Keane - Executive Sponsor;	
Oversight	Markus Ramlall - Team Leader	
LIPA Executive:	Ranking:	
Donna Mongiardo, Vice President - Controller	Moderate	
Objectives and Assumptions of the Recommendation:		

Identify the O&M associated with planned capital projects to ensure that new requirements will be included in the annual budget.

Deliverable:

Each year, PSEG Long Island budget staff will work with each business area to obtain a list of Capital Projects. The PSEG Long Island budget and operating staff will review the list of projects and identify projects with a potential O&M impact and complete a Capital Project O&M Assessment Analysis. This analysis will be shared with LIPA. These projects will likely be large projects that either result in the implementation of new technology or system expansion. The Capital Project O&M Assessment Analysis will be factored into the current year budget development and multi-year O&M and capital financial plan projections.

PSEG Long Island will revise its current Budget Policy and Procedures to include the evaluation of capital projects and development of the Capital Project O&MAssessment Analysis as part of the development process. The analysis of the capital program and capital projects in terms of their impact to O&M funding will be incorporated into future budgets.

Deliverables/Milestones	Due Date	Status	Comments
Revise current Budget Policy and	12/31/2018	Completed	
Procedures to include evaluation of		-	<u>^</u>
capital projects and development of			
a Capital Project O&M Assessment			
Analysis as part of the budget			
development process			

Item Status Completed

9

This recommendation will require nominal incremental costs. Determining projected O&M costs associated with capital projects and including them in the O&M budget has minimal impact on the project estimating process and compilation of O&M budget data.

Reduction in costs is not expected. However, the inclusion of incremental operations and maintenance costs of new capital budgets will improve the accuracy of the O&M budget projects and reduce the risk that needed O&M might have to be forgone due to the realization of unexpected costs related to new capital projects.

The risk of excluding incremental operations and maintenance costs associated with capital projects may cause that portion of the annual budget to be understated. If spending starts to exceed the budget, management may have to defer other vital work.

The customer benefit will be that the operations and maintenance budget will be planned with more accuracy aiding in stronger budget management. This upfront planning may negate a potential negative impact to work plans.

Recommendation:

Complete the process of upgrading LIPA's financial system.

Assigned LIPA Staff:	Assigned PSEG Staff:
Mujib Lodhi, Chief Information Officer and	0 - None
Senior VP of Customer Experience, Donna	
Mongiardo, Vice President - Controller	
LIPA Executive:	Ranking:

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Item Status Completed

Ken Kane, Senior Advisor to Operations Oversight High

Objectives and Assumptions of the Recommendation:

A new Enterprise Resource Planning (ERP) system will improve the functionality of financial reporting and include modules not currently available in LIPA's existing ERP system such as treasury and procurement. The new system will allow for automatic integration of systems currently manually maintained eliminating potential for human error and reducing reliance on manual labor.

A new LIPA ERP system will generate improved reporting and integrate ERP capabilities with PSEG Long Island's ERP to enhance availability of data and provide greater predictive analytics to potentially detect patterns and improve decision making processes. It will allow the Authority to effectively track more detailed data, which can enhance processes, productivity and quality of reporting.

Deliverable:

New LIPA ERP system with accounts payable, general ledger, procurement and human resources modules. The new ERP system will be able to upload information from the PSEG Long Island SAP system.

Deliverables/Milestones	Due Date	Status	Comments
Complete acquisition for Project	5/4/2018	Completed	
Management Services			
Complete acquisition for System	12/31/2018	Completed	
Implementation Services			
Complete Project Initiation and	3/31/2019	Completed	
Planning Phase			
Perform the System Configuration	9/30/2020	Revised	Implementation has required
and Integration/Data Conversion			extending completion of this
and Verification/System			step from its original 5/31/2020
Testing/Training			due date.
Go live and post-implementation	10/30/2020	Revised	Revised pursuant to extension
support			of testing step.

LIPA estimates that it will incur incremental costs to develop a new ERP system totaling approximately \$3 million to \$5 million. On-going annual maintenance costs are estimated to range from \$150,000 to \$250,000. There may be some additional costs associated with a new ERP system, which may be identified prior to moving ahead with the effort.

The project work will be completed primarily with outsourced resources, and is estimated to require approximately 7,600 hours. There will be additional internal resource hours needed for implementation and training.

Benefits are dependent on the implementation of specific best practices. Benefits will include (1) ability to do improved analytical work (2) easier access to PSEG Long Island data and (3) automation for journal entry uploads. Overall benefits will be to improve the current process, enhance reporting and auditing capabilities. Labor savings will be de minimis.

The risk of implementing a new ERP system include data conversion error and implementation issues, which can be minimized with a controlled implementation. The risks of not completing this recommendation include missed opportunities for knowledge transfer, reduction of manually intensive activities, and implications of manual errors due to lack of interfacing systems.

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Recommendation:

Determine the feasibility and cost of establishing interfaces between PSEG Long Island's MicroStrategy, Profitability and Cost Management (PCM), and SAP systems to eliminate the need for manual data transfer processes. If cost effective, implement processes to allow electronic data transfer between the systems.

Assigned LIPA Staff:

Donna Mongiardo, Vice President - Controller, Mujib Lodhi, Chief Information Officer and Senior VP of Customer Experience

Assigned PSEG Staff:

Margaret Keane - Executive Sponsor; Faisal Bhatti and Markus Ramlall - Team Leaders

LIPA Executive:

Ranking: Low

Ken Kane, Senior Advisor to Operations Oversight

Objectives and Assumptions of the Recommendation:

The objective of the audit recommendation is to automate the current manual process of uploading budget data from Profitability and Cost Management (PCM) system into the SAP financial system to reduce the possibility of errors and improve the efficiency of PSEG Long Island's budget preparation process

Deliverable:

PCM is the existing Enterprise budget system used by PSEG and all the affiliates, including PSEG Long Island. The budget data in PCM is uploaded into SAP Enterprise financial system so that budget and actual data can be analyzed. However, currently it is a manual process to upload budget data from PCM to SAP.

Both systems are in consideration for replacement and active projects are underway to select the new system and implement accordingly. PSEG's SAP system is a lifecycle replacement candidate as SAP plans to sunset their ERP platform in 2025 while the PCM budget system needs to be upgraded prior to December 2021.

Due to the timing of the replacement these systems for PSEG, PSEG Long Island will include the requirements for developing interfaces with the systems identified by the audit into the planning and design of the replacement systems.

However, since 2017, PSEG Long Island has taken the following actions to mitigate the risks identified in the audit:

• Beginning in October/November of 2017, PSEG Long Island is using PCM for planning only headcount and labor. It is no longer being used to budget for Non- Labor components. All fringes and non-labor expenses are planned directly into the SAP system.

In regards to the labor, to confirm that all records are transferred from PCM to the SAP system, PSEG Long Island has implemented the following checks and balances to ensure accuracy:

- Previously, multiple analysts were able to upload data from PCM to SAP. Now, there is one dedicated PSEG Long Island SAP analyst who has the ability to access the export / import transaction codes in PCM and SAP.
- The analyst generates an output file from PCM and then uses Win shuttle scripts (templates designed to upload into SAP) to perform the upload function to SAP. This file contains capacity hours, labor dollars, and headcount information.
- Once SAP is fully loaded with PCM labor data, the analyst performs a reconciliation comparing SAP with PCM. In addition, each planning and budget analyst further reviews the labor to check their assigned line of business by running the scheduled / plan transaction code in SAP and compares the data to the capacity report in PCM. Once all labor is confirmed correct in SAP, the next phases of the budget process begin directly in SAP and PCM is no longer utilized.

Deliverables/Milestones	Due Date	Status	Comments
Reconciliation process has been	10/1/2017	Completed	
developed to compare SAP with			
PCM Once all labor is confirmed			
correct in SAP, the next phases of			
the budget process begin directly in			
SAP and PCM is no longer utilized			
Win Shuttle scripts have been	10/1/2017	Completed	
developed to automate the upload of			
PCM files			
Established one dedicated PSEG	10/1/2017	Completed	
Long Island SAP analyst who has			
the ability to access the export /			
import transaction codes in PCM			
and SAP			
All fringes and non-labor expenses	10/1/2017	Completed	
are planned directly into the SAP			
system			

Up until 2017, Labor, Non Labor and Fringes were planned and input into PCM to be uploaded into SAP, thus requiring reconciliation in SAP to make sure the data was transferred accurately. The reconciliation process for the Non-labor and Fringes took approximately 3 days for each of the 12 team members (288 man hours). Since late in 2017, the process changed and Non Labor and Fringes were directly input into SAP for the 2018 planning process and therefore reconciliation is no longer required for these components. Therefore, an overall savings of 288 man hours has been achieved for the organization as a result of this change in the planning process.

Risk Analysis: Eliminate errors due to manual processing.

Customer Benefit Analysis: N/A

Recommendation:

LIPA should build on its recent success in "homogenizing" groups of debt covenants to increase consistency among other debt instruments.

Assigned LIPA Staff:	Assigned PSEG Staff:
Christopher DiGilio, Manager Treasury	0 - None
LIPA Executive:	Ranking:
Ken Kane, Senior Advisor to Operations Oversight	Low

Objectives and Assumptions of the Recommendation:

NorthStar recognizes that LIPA has taken steps to "homogenize" its debt covenants. For instance in 2017, when establishing lines of credit with four banks, LIPA successfully negotiated with each to have each agreement conform to a single, "homogenized" set of terms and covenants and to allow proactive reporting on its website rather than individual paper filing thus streamlining and saving resources. A similar process was undertaken to standardize agreements in 2015. The objective of this recommendation is to encourage LIPA to continue this strategy of conforming future agreements to a single set of terms and covenants.

The recommendation is only actionable as agreements come up for renewal.

Deliverable:

Deliverables/Milestones	Due Date	Status	Comments
Homogenizing Letter of Credit	3/22/2019	Completed	
agreement Bank Revolver renewal		-	2
Homogenizing Letter of Credit	5/1/2020	Completed	
agreement with US Bank renewal		-	^
Homogenizing Letter of Credit	6/29/2021	Completed	
agreement with TD Bank renewal		-	

Cost Benefit Analysis:

The recommendation reflects existing practices and does not result in additional costs or benefits.

Recommendation:

Develop evaluative criteria or other measures to assess the effectiveness of the planning process. Effectiveness should be measured based on specifics, for example:

- Number and timeliness of system studies
- Timeliness of development of [Project Justification Documents] PJDs

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- Quality of PJDs (e.g., do they contain all requisite information?)
- Relative accuracy of conceptual level estimates

Assigned LIPA Staff:

Assigned PSEG Staff:

John O'Connell - Executive Sponsor;

Anie Philip - Team Leader

Item Status Completed

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets Ranking: Moderate

Objectives and Assumptions of the Recommendation:

The objective is to implement evaluative criteria so that the effectiveness of planning process can be measured and improved.

Deliverable:

This initiative will deliver a list of measures that will be published on a periodic basis to indicate the effectiveness of the planning process.

Deliverables/Milestones	Due Date	Status	Comments
Solicit feedback from various	10/29/2018	Completed	
internal and external stakeholders,			
including LIPA and the DPS			
Develop proposed criteria and	11/15/2018	Completed	
measures			
Hold meeting with internal and	12/14/2018	Completed	
external stakeholders, including		-	
LIPA and the DPS to review the			
proposal			
Obtain Executive Approval and	1/15/2019	Completed	
finalize criteria and measures			
Implementation	5/1/2019	Completed	
Confirm effectiveness of criteria	12/31/2019	Completed	
and measures.			

Costs are not significant. Improvements in planning effectiveness can yield appreciable savings.

Risk Analysis: No risk expected with this recommendation.

Customer Benefit Analysis:

Improvements in the planning process will create improvements in system performance and will also improve effectiveness of approved budgets.

Recommendation:

Perform detailed cost-benefit analyses consistent with Transmission Planning's analyses for projects related to thermal overload.

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Assigned LIPA Staff:

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Our objective is to assure that the all projects receive an appropriate level of cost benefit analysis. Key assumptions are that different types of projects require different levels of cost benefit analysis, and that achieving the appropriate level of cost benefit analysis will assure optimal selection of projects, thereby optimizing overall investment results.

Deliverable:

Clear guidance on what types of projects will receive which types of cost benefit analysis, and implementation processes to deliver results in accordance with the guidance. Guidance will include which type of cost benefit analysis will be required for various repair/replace scenarios.

Note that this action plan will also address completion of 2013 recommendations 9.4.2.

Deliverables/Milestones	Due Date	Status	Comments
Identify internal and external	12/31/2018	Completed	
stakeholders, including LIPA and			
the DPS			
Solicit feedback from T&D and	1/31/2019	Completed	
stakeholders to determine which			
types of projects will receive which			
types of CBAs. The PSC's BCA			
framework order will be considered,			
and where reasonable and			
applicable, applied. Create a			
document summarizing decisions.			
Review cost/benefit analysis	2/1/2019	Completed	
approach and compare to approach			
recommended in first deliverable.			
Determine gaps.			

Assigned PSEG Staff:

John O'Connell - Executive Sponsor; Joe Cicalo - Team Leader

Ranking:

Moderate

Item Status Completed

Hold meeting to review proposal with internal and external stakeholders, including LIPA and the DPS.	3/1/2019	Completed	
Create new analysis templates and training materials.	3/31/2019	Completed	
Train relevant personnel and implement new procedure.	5/1/2019	Completed	

Costs to develop cost benefit guidelines are minimal. Costs to create enhanced cost benefit materials, in line with the new guidelines, will be moderate. It is expected that benefits associated with optimized project selection will offset implementation costs. Benefits include optimized value from budgeted funds and selected projects.

Risk Analysis:

Failure to strike the proper balance of number and scope of cost benefit analysis will lead to less than optimal results.

Customer Benefit Analysis: Improvement in project alternative analysis.

Recommendation:

Continue implementing the vegetation management program to meet annual targets. Complete the mainline hardening program.

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Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

PSEG Long Island will continue implementing the vegetation management ("VM") program to meet annual targets and complete the mainline hardening ("MLH") program. Existing VM policies and procedures will be reviewed in order to meet annual targets. Existing mainline MLH program policies and procedures will be reviewed in order to complete the program. Monitoring and reporting will be enhanced and corrective action plans implemented as needed.

Deliverable:

The deliverables for this recommendation include program goals, tracking processes, and annual reporting for the main line hardening and vegetation management programs.

Deliverables/Milestones	Due Date	Status	Comments
Verify mainline hardening (MLH)	10/1/2018	Completed	
schedule. Implement any necessary			
changes to meet targets.			
Identify the Vegetation	11/1/2018	Completed	
Management goals for 2018, 2019,			
2020 and 2021 program.			
Design and establish tracking	12/31/2018	Completed	
criteria, and frequency and forum			
for reporting of Vegetation			
Management goals.			
Design and establish tracking	12/31/2018	Completed	
criteria, and frequency and forum			
for reporting of mainline hardening			
goals.			

Assigned PSEG Staff:

John O'Connell - Executive Sponsor; Mark Cerqueira - Team Leader

Ranking:

High

Item Status Completed

Mainline hardening total program costs are \$729 million. The program was previously authorized based on storm outage reductions and storm damage cost reductions.

The vegetation management program costs are expected to total approximately \$30-40 million annually. Benefits from the program will include improvements to blue sky and storm SAIFI, SAIDI and MAIFI, as well as improvements to Customers Experiencing Multiple Interruptions (CEMI). Storm cost savings will also be realized.

Not completing the Mainline Hardening and Vegetation Management programs could potentially result in a decline in performance related to SAIFI, SAIDI, MAIFI and CEMI and would result in loss of federal funding. Factors external to the MLH and VM programs can impact annual spend levels and timing of completions of both programs.

Implementation will result in customer benefits in the form of improvements to blue sky and storm SAIFI, SAIDI and MAIFI, as well as improvements to CEMI and storm cost savings.

Recommendation:

Complete the Emergency Response Training for all employees as required.

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Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Continual training, in conjunction with periodic exercises and performance of duties during actual emergency events, is a critical element of the emergency preparedness process and an effective means to refresh and reinforce skills in preparation for restoration events. The purpose of this action plan is to ensure that all employees receive the appropriate level of emergency response training.

Deliverable:

The Emergency Restoration Plan (ERP) will be modified to more accurately describe the restoration training program. This will include a clarification of language in ERP that defines training requirements, clearly differentiating between those with traditional and non-traditional storm roles and includes language that defines training completion requirements (i.e., complete 90% planned training per year) to ensure clear definition of compliance. Include updated language in 2019 ERP Plan Filing (due to DPS December 15, 2018) and commence application of compliance with 2019 training plan.

Deliverables/Milestones	Due Date	Status	Comments
Define the tracking criteria, the	12/1/2018	Completed	
frequency and forum for status			
reporting to oversee delivery of the			
training. Implement tracking			
system.			
Clarify language in ERP that	12/1/2018	Completed	
defines training requirements,			^
clearly differentiating between those			
with traditional and non-traditional			
storm roles.			

Assigned PSEG Staff:

John O'Connell - Executive Sponsor; Louis Debrino - Team Leader

Ranking:

Low

Storm role training will have a minimal cost impact and will help promote more effective storm response.

Risk Analysis: No appreciable risks.

Customer Benefit Analysis:

Well trained staff capable of performing assigned roles during storm periods will contribute to overall positive response and customer experience.

Recommendation:

Improve Emergency Response Training in the ERP to identify type of training and frequency by position.

Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The purpose of this action plan is to ensure the restoration training program accurately depicts the training requirements (i.e., type and frequency) and status of training for PSEG Long Island employees with non-traditional restoration roles.

Deliverable:

The Emergency Preparedness Department will review the Emergency Restoration Assignment Database to verify the number of employees serving in traditional versus non-traditional storm roles. Those employees assigned to traditional storm roles are not required to attend separate emergency restoration training, as they perform their regular blue-sky role during restoration events. Non-traditional storm roles will then be broken down by title (i.e., Damage Assessor, Crew Guide, etc.) to ensure training, if necessary, exists for each distinct role identified. Once complete, Emergency Preparedness will confirm when each employee last attended the appropriate restoration training to which they were assigned. Lastly, utilizing the identified training cycle, a training matrix will be developed and training will be tracked to ensure that employees complete their required training (either Initial or Refresher) at the appropriate frequency. The Emergency Preparedness Department will also modify the Emergency Restoration Plan (ERP) to clearly depict the above activities.

Deliverables/Milestones	Due Date	Status	Comments
Prepare a document identifying	12/1/2018	Completed	
training requirements by position,			
including training type (i.e., on the			
job training, workshop, classroom,			
etc.) and recommended training			
frequency.			

Item Status Completed

John O'Connell - Executive Sponsor; Louis Debrino - Team Leader

Ranking:

Low

Identifying emergency role training requirements will have a minimal cost impact and will create a very small benefit in employee qualifications.

Risk Analysis: No appreciable risks.

Customer Benefit Analysis:

Well trained staff capable of performing assigned roles during storm periods will contribute to overall positive response and customer experience.

Recommendation Number: Recommendation:

18

Complete development of the CMMS.

Assigned LIPA Staff:

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Operations Oversight

Item Status In Progress

Assigned PSEG Staff:

John O'Connell - Executive Sponsor John Mccumiskey - Team Leader

Ranking:

Moderate

Objectives and Assumptions of the Recommendation:

The Computerized Maintenance Management System (CMMS) software platform has been launched and is presently being utilized by Asset Management (AM) to better understand the health and performance of key T&D assets such as station transformers and load tap changers. Additional enhancements and modifications to the platform are planned and were communicated within the audit process. The action plan below identifies the high-level activities necessary to enhance the existing platform and complete the development of the CMMS tool.

Additionally, beyond CMMS, there is an objective to establish broad AM components that, in conjunction with CMMS, will improve system performance and reduce system costs.

Deliverable:

To satisfy the audit recommendation, PSEG Long Island will:

- Create a schedule indicating the deliverables required to complete the development of CMMS
- Create a schedule indicating the deliverables required to complete the development of PSEG Long Island AM
- Create a document summarizing the forum, frequency and content of CMMS and AM status updates
- Complete the deliverables from the CMMS and AM schedules

CMMS schedule will focus on implementing more powerful analytics to further enable benefits associated with condition based maintenance.

To complete closure of 2013 recommendation 12.4.3, an asset management road map has been developed to cover other asset management items, beyond CMMS. The Supplement Recommendation #18 addresses the 2013 North Star 12.4.2 recommendation detailing specific deliverables through 2022. Within each deliverable specific asset management personnel are engaged to assure actions and initiatives are being progressed to completion as these items are

goals and objectives within the performance plans for these employees. Specific progress reporting cycles have also been with periodic assessments performed by Asset Strategy.

Deliverables/Milestones	Due Date	Status	Comments
Document format, timing and forum for	12/1/2018	Completed	
providing status updates to CMMS and Asset			
Management schedule			
Update the current CMMS / Asset	12/1/2018	Completed	
Management schedule indicating deliverables			
and milestones for full implementation of			
CMMS and Asset Management.			
Complete all Milestones associated with	5/22/2020	Completed	
Phase 1 of the Asset Management / CMMS			
implementation plan.			
Specific Phase 1 Milestones include; Enhance			
Transmission Inspection Program with			
Digital Photography, Expand OSP (ATO's &			
ACR's) maintenance plans within SAP,			
Assess data availability and quality for each			
asset class, Establish process to validate data,			
Transformer diagnostic data in CMMS (CO2			
/CO, Duval Triangle, Roger Ratio), Enhance			
GIS mapping tool as the asset registry for			
outside plant by adding outside plant asset			
real time demographic and health data (i.e.			
2019 pole inspections, reinforcements) into			
GIS, Create DGA algorithm using IEEE			
C57.104, Expand new maintenance activities			
for UG Transmission (X-Ray and DGA),			
Improve oversight of Inside Plant			
maintenance programs, Install monitors on			
remaining >100 MVA transformers,			
Implement 10 year program to install			
communications network to support			
substation monitoring, and Define average			
life expectancies for each asset class			

Complete all Milestones associated with	12/31/2021	In progress	
Phase 2 of the Asset Management / CMMS			
implementation plan.			
Specific Phase 2 Milestones include;			
Create Asset Class Specific Repair/Replace			
Strategies (2013 Recommendation 12.4.2),			
Initiate 10 year Program to Install monitors			
on 539 transformers (<100 MVA),			
Implementation of non-operational data into			
condition assessment (Circuit breakers),			
Initiate Long Term Capital Investment Plans,			
Pilot Program to Install Bushing Monitors on			
Select Transformers, Production of a			
comprehensive Asset Management Policy			
document and associated Asset Class			
Specific Plans (2013 Recommendation			
12.4.3), and Implementation of non-			
operational data into condition assessment			
(UG transmission cables)			
Complete all Milestones associated with	5/31/2022	In progress	
Phase 3 of the Asset Management / CMMS			
implementation plan.			
Specific Phase 3 Milestones include;			
Repair / Replace Algorithms (Power			
Transformers), Repair / Replace Algorithms			
(Circuit Breakers), Repair / Replace			
Algorithms (UG Transmission), and			
Implementation of non-operational data into			
condition assessment (Power transformers)			

Costs to Implement: The cost for this effort will be incurred in both capital and O&M related expenses. Capital costs will include direct system hardware and software purchases and licensing costs as well as labor for both external IT contractors/consultants and internal labor costs. Total expected capital cost to complete the development of CMMS is approximately \$6.5 million. O&M costs will be incurred and will include employee training on new systems and applications, IT operational and maintenance costs as well as T&D support costs. One time O&M costs are estimated at \$1.0 million. Ongoing annual O&M cost is approximately \$1.0 million. Actual costs to complete the system will be validated prior to project spending approval.

Benefits from Implementation: The primary benefit from this implementation will be the improved care for critical assets that support the Transmission and Distribution system. A

movement from frequency based maintenance of critical assets to a condition based program will allow for more efficient use of resources and an eventual reduction in annual maintenance costs for both preventive and corrective maintenance activities. The implementation of the CMMS and Asset Management systems will also improve system reliability. Benefits will be quantified in detail as part of the funding approval process.

Risk Analysis:

The implementation will span multiple years and requires support from IT as well as internal T and D organizations to identify requirements and assure the system meets business needs within each of the defined deliverables. Any dependencies to other IT investments will need to be defined and understood within the overall scope of this implementation.

Customer Benefit Analysis:

Implementation of this recommendation will result in increased system reliability by improving the performance of critical substation assets such as station transformers and breakers. Understanding when assets have reached end of life and planning for replacement prior to failure will result in less impact to customers and reduce risk for extended system outages. For LIPA, as the asset owner, this implementation will provide for more efficient use of capital and O and M budgets as replacement of critical assets will be made based on asset health data that will extend the life of these assets.

Recommendation:

Continue monitoring SAIFI both from a system and cause basis. Continue targeting and prioritizing programs that address reliability.

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Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Our objective is to drive ongoing improvement to SAIFI and related metrics through prioritized targeted system improvement work. Our assumption is that appreciable reliability improvements can be realized through targeted prioritized investments.

Deliverable:

Develop an approved document for summarizing annual plans for SAIFI, communicating results, and short term/long term planning to support scorecard metrics.

Deliverables/Milestones	Due Date	Status	Comments
Summarize the key aspects of	11/1/2018	Completed	
SAIFI program including programs			
approaches goals and program			
management practices and			
implement according to plan.			
Define the tracking criteria, the	3/15/2019	Completed	
frequency and forum for status			
reporting to oversee delivery of			
program goals. Implement tracking			
system.			

Assigned PSEG Staff:

Item Status Completed

John O'Connell - Executive Sponsor; Wayne Baldassare

Ranking:

High

Prioritized targeted system improvement work should lead to improved SAIFI performance. Additional costs or savings are not expected as the recommendation continues existing programs.

Risk Analysis:

If not completed, there may be a reduction in SAIFI performance.

Customer Benefit Analysis:

Benefits include better understanding of system conditions and weaknesses and the development of proactive targeted programs to improve reliability and improve asset health condition.

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Item Status Completed

Recommendation:

Perform all policies, procedures and control functions that are currently and formally required. •PSEG Long Island should conduct all audits as required in the A&R OSA.

•Adhere to formal document control policies and procedures.

•PSEG Long Island should follow the PMP Playbook and its procedures.

Assigned	LIPA	Staff:
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Assigned PSEG Staff:

Kathleen Mitterway, Senior Advisor for Audit Margaret Keane - Executive Sponsor; Rocky Shankar - Team Leader LIPA Executive: **Ranking:** Moderate

Kathleen Mitterway, Senior Advisor for Audit

Objectives and Assumptions of the Recommendation:

The purpose of the recommendation is to ensure audits required per the A&R OSA are performed, that policies and procedures are adhered to, and that the Project Management Plan (PMP) Playbook and its procedures are followed. Observation #5 noted that "PSEG Long Island's procedures developed to date address many components of capital project, but as yet have not evolved to fully support project management and control." (Page IX-18) PSEG Long Island will develop updated procedures that address the major components of capital project delivery and ensure that all functions are being performed to fully support effective project management and controls.

Additionally, these deliverables will also address the 2013 Recommendation 10.4.11, to improve capital project document control.

Deliverable:

• The A&R OSA stipulates PSEG Long Island will provide LIPA on an annual basis: i) an annual audit of capital improvement made in the prior contract year. The audit scope shall include the accuracy of plant records, maps, and asset maintenance databases. ii) Physical inventory of all capital assets from time to time. Starting in 2019, PSEG Long Island Project Management Office, Training Support & Contract Services, and the Electric East & West Divisions will prepare a list of capital projects implemented in the prior year. Internal Audit will select a sample of projects from the listings and test to ascertain they are properly reflected in the appropriate systems. PSEG Long Island Internal Audit will conduct testing to determine the business' adherence to documented control policies and procedures as part of its testing of internal controls annually and during its performance of internal audits and reviews.

• Projects and Construction (P&C) Observation #6 noted that "PSEG Long Island has not fully adopted and implemented the PMP and the seven procedures to deliver capital project." As a result of the above observation, PSEG Long Island will review the existing procedures listed below to determine the major components of capital project delivery, if any, that are not addressed.

- Project Management Play Book TD-PM-001-0003
- •Project Execution Plan TD-PM-002-0001
- •Project Authorization TD-PM-001-0001
- •Status Reporting TD-PM-002-0006
- •Project Scope Management TD-PM-001-0004
- •Document Management TD-DM-001-0001
- •Project Cost Management TD-PM-002-0004
- •Construction Management and Contract Administration TD-CM-001-0001
- •Project Scheduling TD-PM-002-0002
- •Invoice Management TD-CM-001-0002

Following review of the procedures, PSEG Long Island will revise the existing procedures and/or develop new procedures, implement and train all key personnel.

Deliverables/Milestones	Due Date	Status	Comments
Review existing procedures to	10/5/2018	Completed	
determine major components that			
are missing			
Revise and/or develop procedures	12/3/2018	Completed	
Train relevant Projects &	2/1/2019	Completed	
Construction personnel and key			
stakeholders			
Implementation of the revised or	3/29/2019	Completed	
new procedures			
PSEG Long Island Internal Audit	6/30/2019	Completed	
will select a sample of projects from			
the listings and test to ascertain they			
are properly reflected in the			
appropriate systems			
PSEG Long Island Internal Audit	1/31/2020	Completed	
conducts testing to determine the			
business' adherence to documented			
control policies and procedures as			
part of its testing of internal controls			
annually and during its performance			
of internal audits and reviews			

• Internal Audit: Conducting annual audits of capital improvements made in the prior year and testing of control policies and procedures are sound business practices to ascertain fraudulent activities are not occurring and that employees are adhering to company policies and procedures.

• P&C: Updating the procedures that address the major components of capital project delivery will better document roles, responsibilities and processes, which will result in the effective use of capital and increased project management performance.

Risk Analysis:

The risk of not accounting for capital improvements made in the prior year and testing of control policies and procedures may lead to the occurrence of inaccurate records or fraudulent activities.

Customer Benefit Analysis:

Confirming that our asset records are accurate helps to properly account for LIPA's assets and that PSEG Long Island is not over/under stating the assets which could impact revenue requirements and ultimately the customer bill.

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Item Status Completed

Recommendation:

The URB management processes and controls should be audited annually to confirm adherence to its charter and control policies and procedures.

Assigned LIPA Staff:

Kathleen Mitterway, Senior Advisor for Audit

LIPA Executive:

Assigned PSEG Staff:

Ranking:

Margaret Keane - Executive Sponsor; Rocky Shankar - Team Leader

Kathleen Mitterway, Senior Advisor for Audit

Objectives and Assumptions of the Recommendation:

The purpose of the recommendation is to ensure the Utility Review Board (URB) Charter is upto-date, that URB meeting minutes are documented and actions are tracked, and that capital project change requests contain specific and detailed information to enable the URB to make an informed decision to either approve or deny the request.

Deliverable:

PSEG Long Island Internal Audit: a) Recently completed a URB Audit (July 2018). While some observations were identified, the URB process has improved since the Review conducted in 2016. In addition, most of the findings cited in the NorthStar Management Audit Report are no longer applicable, as they were addressed prior to the PSEG Long Island Internal Audit.

PSEG Long Island Internal Audit will conduct future URB Audits on a bi-annual basis.

Deliverables/Milestones	Due Date	Status	Comments
Issuance of PSEG Long Island	7/31/2018	Completed	
Internal Audit report on the URB			
process			

Conducting periodic internal audits will lend itself to evaluating the effectiveness of controls and adequacy of documentation within the URB process. Potential risks within the URB process could include:

• Pertinent information is inaccurate or omitted from the project documentation submitted for URB review, resulting in incorrect project funding.

- Capital projects not sufficiently scrutinized by the URB may lead to incorrect project funding.
- Unauthorized project costs are incurred, resulting in potential excessive expenditures.

• Property, Plant and Equipment balances are misstated if project costs are recorded incorrectly. Budget variance analysis is based on inaccurate information.

• Variance analysis is compromised due to inaccurate information.

The periodic audits will mitigate these risks.

Recommendation:

Develop and implement procedures related to quality assurance and quality controls for capital programs and projects.

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Assigned LIPA Staff:

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff: Margaret Keane - Execu

Item Status Completed

Margaret Keane - Executive Sponsor; Anthony Stallone - Team Leader

Ranking:

Moderate

Objectives and Assumptions of the Recommendation:

A well-developed QA/QC program will monitor effective capital project delivery and assure that all functions are being performed to fully support project management and control.

Observation #12 notes that "PSEG Long Island does not have a capital program and project quality assurance and quality control (QA/QC) program." PSEG Long Island will update and enhance its existing QA/QC procedures as set forth below.

Deliverable:

The work plan includes the following major activities:

- Develop updated procedures as noted under Recommendation
- Define the QA/QC function and methodologies
- Define roles and responsibilities (senior management, managers, and supervisors)
- Establish a QA/QC Program Leader within the PMO organization
- Develop and implement the QA/QC Program procedures and supporting processes

Deliverables/Milestones	Due Date	Status	Comments
Define the QA/QC function and	2/1/2019	Completed	
methodologies			
Establish a QA/QC Program Leader	3/1/2019	Completed	
within the PMO organization			
Develop updated procedures as	4/1/2019	Completed	
noted under Recommendation			
Number REC0020 (Procedures)			
Define roles and responsibilities	6/1/2019	Completed	
(senior management, managers,			
supervisors)			

Develop the QA/QC Program	6/1/2019 Completed
procedures in accordance with	
industry best practices and in	
compliance with all applicable	
government policies.	
Train all PMO and Projects &	9/1/2019 Completed
Construction personnel and	
implement new procedures and	
processes.	

The cost to achieve the process change will be absorbed across the spectrum of Project Management Office functions; however we anticipate the addition of one (1) FTE (\$150,000) to act as overall QA/QC program oversight.

Developing the QA/QC program and procedures that address the major components of capital project delivery will better document roles, responsibilities and processes which will result in the effective use of capital and increased project management performance.

Risk Analysis:

The lack of a QA/QC program will decrease efficiency on the capital projects and will diminish use of the capital budget.

Customer Benefit Analysis:

Implementing a rigorous QA/QC program may increase the effectiveness in the use of capital and project management performance.

Item Status Completed

Recommendation:

Address the deficiencies in project estimating by making organizational and process improvements and creating a capital project estimating function/organization equipped with appropriate tools.

• Establish an organizational group of professional estimators for transmission and distribution that will develop estimates for planning, engineering and construction.

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- Use these internal estimators to set and validate baseline estimates established for contractors.
- Assess the process used to develop and update estimates for completion.
- Establish project estimating tools such as a formal data base of project estimates and support tools such as software and develop and manage an estimating data true-up process.
- Review and document inflation and escalation factors and analyses used to predict project completion costs for each project estimate.
- Review project budget numbers and cost reporting information to determine whether they represent the most currently approved budget and cost data.
- Determine whether cost and schedule systems are integrated and whether the project master schedule is appropriately integrated with the approved project budget.
- Formally document project cost reviews at each level of estimate in detail and at various stages of project completion as called for in Project Cost Management (Procedure TD-PM-002-0004).
- Review project guidelines for performing trend analyses and exception reporting.
- Evaluate how trends were identified, analyzed, brought to management's attention, and how they were resolved.
- Determine whether cost control systems, forecasting and trend analyses directed attention to bulk rates, commodities and productivity to reveal above/below average performance.
- Continuously verify the accuracy of estimates versus the actual project cost and maintain a record of updates to the estimating database.

Assigned LIPA Staff:	Assigned PSEG Staff:
Michael Simione, Director of Transmission and Distribution System Oversight	Margaret Keane - Executive Sponsor; Anthony Stallone - Team Leader
LIPA Executive:	Ranking:
Rick Shansky, Senior Vice President of Power	High

Objectives and Assumptions of the Recommendation:

The objective of establishing a capital project estimating function/organization is to improve the accuracy of forecasting and decision-making and to enable better allocation of available capital.

Deliverable:

PSEG Long Island's estimating group function was established in 2017 and the majority of the recommended process improvements were implemented at the same time the Audit took place (between February 2017 and March 2018). Therefore, the audit findings were not based on the new estimating function and process improvement implementation.

The new estimating software/database mentioned in the recommendations was implemented in July 2018 (expected to take full effect by the end of 2018). This implementation was after the audit report was finalized.

The work plan for cost and schedule integration is covered in the response to Recommendation 24.

The following findings and recommendations were addressed between February 2017 and March 2018. These deliverables also addressed the 2013 Recommendation 10.4.6, deficiency findings in project estimating by making organizational and process improvements and creating a capital project estimating function/organization equipped with appropriate tools.

- Establish an organizational group of professional estimators for transmission and distribution that will develop estimates for planning, engineering and construction: The Estimating group is now staffed with two estimators and one estimating group leader. Additional estimators positions to be filled in 2018-2019.
- Use these internal estimators to set and validate baseline estimates established for contractors: The internal estimators now provide cost estimate for development of the bid strategy.
- Assess the process used to develop and update estimates for completion: There is a defined process for updating estimates at specific stages through the project lifecycle.
- Establish project estimating tools such as a formal data base of project estimates and supports tools such as software and develop and manage an estimating data true-up process: Sage estimating software was delivered July 2018, and is expected to be in full production by December 31, 2018.
- Review and document inflation and escalation factors and analyses used to predict project completion costs for each project estimate: An inflation / escalation factor is now applied to each project estimate.
- Review project budget numbers and cost reporting information to determine whether they represent the most currently approved budget and cost data: The review of budget numbers and cost reporting is implemented and being used as a part of the URB process
- Formally document project cost reviews at each level of estimate in detail and at various stages of project completion as called for in Project Cost Management (Procedure TD-PM-002-0004): The project cost reviews at each level of estimate are implemented and are now incorporated into the URB

process.

• Evaluate how trends were identified, analyzed, brought to management's attention, and how they were resolved: The Estimating group performs the trend analysis and report to management. As an example in 2018, OH construction cost was identified to be higher than anticipated due to out of state labor constraints.

The following findings / recommendations will be addressed as indicated and noted in the deliverable table below.

- Determine whether cost and schedule systems are integrated and whether the project master schedule is appropriately integrated with the approved project budget: The implementation of the cost and schedule integration will be executed in two phases. Phase 1: Manually match cost and schedule; Phase 2: Work with IT to evaluate methodology to integrate to cost and schedule software. Implementation date for Phase 2 will be developed upon review with IT and Business.
- Review project guidelines for performing trend analyses and exception reporting: See Recommendation No. 26 (Project Management Performance Measures).
- Determine whether cost control systems, forecasting and trend analyses directed attention to bulk rates, commodities and productivity to reveal above/below average performance: See Recommendation No. 26 (Project Management Performance Measures)
- Continuously verify the accuracy of estimates versus the actual project cost and maintain a record of updates to the estimating database: The implementation of this recommendation is in progress. Material cost is being monitored against historical cost and the estimating database is being updated (part of the current estimating process). Contractor cost monitoring is improving and internal labor cost validation is still in progress.

Deliverables/Milestones	Due Date	Status	Comments
Review and document inflation and	6/1/2017	Completed	
escalation factors and analyses used			
to predict project completion costs			
for each project estimate			
Assess the process used to develop	10/1/2017	Completed	
and update estimates for completion		-	<u>^</u>
Use these internal estimators to set	10/30/2017	Completed	
and validate baseline estimates			
established for contractors			
	-		

	10/01/0017 0 1 1
Formally document project cost	12/31/2017 Completed
reviews at each level of estimate in	
detail and at various stages of	
project completion as called for in	
Project Cost Management	
(Procedure TD-PM-002-0004)	
Review project budget numbers and	12/31/2017 Completed
cost reporting information to	
determine whether they represent	
the most currently approved budget	
and cost data	
Establish an organizational group of	4/30/2018 Completed
professional estimators for	
transmission and distribution that	
will develop estimates for planning,	
engineering and construction	
Evaluate how trends were	6/1/2018 Completed
identified, analyzed, brought to	
management's attention, and how	
they were resolved	
Establish project estimating tools	7/24/2018 Completed
such as a formal data base of project	
estimates and support tools such as	
software and develop and manage	
an estimating data true-up process	
Establish a process for ongoing	9/1/2018 Completed
verification of the accuracy of	
estimates versus the actual project	
cost and maintain a record of	
updates to the estimating database	
Determine whether cost and	4/1/2019 Completed
schedule systems are integrated and	
whether the project master schedule	
is appropriately integrated with the	
approved project budget	
Determine whether cost control	9/1/2019 Completed
systems, forecasting and trend	- · - · · I · · · · · · · ·
analyses directed attention to bulk	
rates, commodities and productivity	
to reveal above/below average	
performance	

Review project guidelines for	9/1/2019 Completed
performing trend analyses and	
exception reporting	

The cost of the above-mentioned implemented actions is following:

- Cost of three full time employees: \$450,000 per year (2 positions are filled, one position remaining to be filled)
- Cost of Sage implementation project: \$500,000 (one-time cost incurred July 2018); \$130,000 (annual software and system maintenance cost).

Risk Analysis:

With regards to cost and schedule systems integration, PSEG (Enterprise) is evaluating the replacement of the existing SAP system at its end of life in 2025, and integration analysis will be included into that review.

Customer Benefit Analysis:

Improving estimates will allow PSEG Long Island to better prioritize capital investments which will ultimately improve the reliability of the electric system.

Item Status Completed

Recommendation:

Utilize a WBS in the initial phases of the project justification and conceptual estimating, and continue their refinement as the project progresses.

• Develop well-defined work packages that can be used to track and measure project performance based on earned value.

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• Plan work in logical work groupings or packages and subdivide into smaller work groupings. Ensure that activities required to perform the work in each group are identified, defined, and dependent relationships established.

• Formalize the use of WBS elements by all project participants in their respective areas of responsibility and as an identification tool for project management performance measurement.

- Use the WBS in procurement/contracting activities and specify the WBS in contractor Requests for Proposals.
- Use the WBS for project costing and as a means to assess the impact of programmatic changes in funding levels on work content, schedules, and contractual support.
- Prepare cost estimates for each WBS element to assist budgeting and project validation.

• Integrate the WBS with PSEG Long Island's accounting systems, project cost management systems and schedule management systems.

• Integrate master work plans and detailed contractor schedules / activities to the WBS to permit integration of schedule information and to facilitate review of status reports and change proposals.

• Refine detailed project estimates initially prepared by WBS element and follow the manner in which the project work was planned, scheduled, estimated, funded and executed.

Assigned LIPA Staff:

Assigned PSEG Staff:

Ranking: Moderate

Margaret Keane - Executive Sponsor;

Anthony Stallone - Team Leader

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Effective capital project management uses a hierarchical Work Breakdown Structure (WBS) to organize project elements into logical bundles of functional work representing discrete work activities that enable scheduling, resource loading and objective progress measurement. The WBS provides the basic framework to plan, execute, and manage the project. WBS coding permits precise identification of project elements to allow accurate project management, budgeting, communication, cost reporting, scheduling and performance.

Effective, January 1, 2015, PSEG Long Island implemented a WBS that subdivides the phases of the project life cycle by project scope, deliverables and resources into manageable parts for which cost and time can be defined, estimated and managed. Its key features include: (1) tailored to the FERC capital asset accounting requirements in that each project is subdivided into major components based on the scope of work---inside plant installation (substation),

outside plant installation (circuit or segments of circuits), withdrawals or removals (substation and circuits) and salvage; (2) segregated by transmission and distribution scope of work and ultimately the corresponding assets of each; (3) each WBS in the structure has a unique fixed assets settlement rule which points the costs incurred against that specific WBS to the fixed assets financial system (Power Plant); and (4) allows the flexibility to place in service the major components of the project at different times where appropriate.

The purpose of the action plan is:

Internally review the existing WBS and identify near term enhancements or improvements that can be made in order to align the scope of work, estimating, scheduling and forecasting into more meaningful, quantifiable and measurable elements of work or deliverables while, at the same time, maintaining compliance with fixed assets capital accounting requirements.
Review industry best practices and identify additional modifications or tools that will support further refinement of the application and format of the WBS

• Utilize the enhanced or improved WBS to support the objectives of Recommendation IX-26 Project Management Performance Measures which is to report project management performance measures that focus on the effectiveness of cost estimation, earned value and schedule management.

Additionally, these deliverables will also address the 2013 Recommendation 10.4.5, to utilize a Work Breakdown Structure (WBS) in the initial phases of the project justification and conceptual estimating, and continue their refinement as the project progresses.

Deliverable:

An internal review of the established WBS is in progress to address any immediate gaps or corrective measures required while maintaining alignment with our financial system and capital accounting requirements. PSEG Long Island will identify and develop enhancements or improvement to the existing WBS that is used within the PSEG Long Island financial system for new 2019 projects.

PSEG Long Island will engage a consultant to optimize the review current best practices relative to other utilities and provide guidance on specific optimization plans with a particular focus on the following specific recommendations:

• Develop well-defined work packages that can be used to track and measure project performance based on earned value.

• Plan work in logical work groupings or packages and subdivide into smaller work groupings. Ensure that activities required to perform the work in each group are identified, defined, and dependent relationships established.

• Formalize the use of WBS elements by all project participants in their respective areas of responsibility and as an identification tool for project management performance measurement.

• Use the WBS in procurement/contracting activities and specify the WBS in contractor Requests for Proposals.

• Use the WBS for project costing and as a means to assess the impact of programmatic changes

in funding levels on work content, schedules, and contractual support.

• Prepare cost estimates for each WBS element to assist budgeting and project validation.

• Integrate the WBS with PSEG Long Island's accounting systems, project cost management systems and schedule management systems.

• Integrate master work plans and detailed contractor schedules / activities to the WBS to permit integration of schedule information and to facilitate review of status reports and change proposals.

• Evaluate the feasibility of automated capital project cost management software for tracking the projects and the use of WBS to allocate costs and relationships to budgets/funding sources for projects.

• Refine detailed project estimates initially prepared by WBS element and follow the manner in which the project work was planned, scheduled, estimated, funded and executed.

PSEG Long Island will utilize the enhanced or improved WBS to support the objectives of Recommendation IX-26 Project Management Performance Measures which is to report project management performance measures that focus on the effectiveness of cost estimation, earned value and schedule management. Following completion of the above key steps, PSEG Long Island will train appropriate personnel and implement the enhanced or improved WBS.

Deliverables/Milestones	Due Date	Status	Comments
Internal review to modify existing	12/28/2018	Completed	
WBS and modify the existing WBS			
that is used within the PSEG Long			
Island financial system to support			
future enhanced reporting			
capabilities as recommended			
Identify consultant with expertise in	5/1/2019	Completed	
utility project management and			
WBS best practices			
Engage consultant and identify	9/1/2019	Completed	
industry best practices and specific			
recommendations to improve PSEG			
Long Island process/ systems and			
issue a formal report with			
recommendations for improvement			
Implement best practices	1/1/2020	Completed	

The estimated cost to engage a consultant and supporting internal resources to conduct an industry best practice evaluation and implement specific process improvements is \$100,000.

Risk Analysis:

The lack of an effective WBS structure will make management of project deliverables challenging, obscure the costs of individual project components and diminish the effectiveness of overall project management.

Customer Benefit Analysis:

Potential benefits of implementing cost-effective WBS improvements could result in a more efficient use of capital that could help advance additional capital projects to improve reliability.

Recommendation:

Formalize and incorporate contingency management in capital project cost estimating and cost management. Formally report the expenditure of contingency funds separately from project estimates rather than inflate total project budget amounts. It is critical that reliable project budgets include contingency funds based on baseline estimates and their relative risks. In addition to project specific contingency elements, a contingency should also be established to address project scope changes and the need for unforeseen administrative or legal support. In order to audit contingency management, the following activities should be included:

- Review the project budgets and individual budget elements including management, design, construction and project specific contingencies.
- Determine whether contingency levels were appropriately evaluated and reviewed in each evolution of project estimating and each project stage.

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- Relate contingency levels with recognized uncertainty and risks at specific levels of planning, design and construction.
- Evaluate project design for unforeseen conditions that might arise or be discovered during the design process and whether these conditions fall within the original project scope (i.e., the program requirements initially articulated by the user in the project definition stage).
- Establish and formalize project cost contingency to cover additional project detail such as unforeseen site conditions, interference, delays or other circumstances that would not have been known at initiation, and expanded or changed project scope not identified during the scope definition phase.

Assigned LIPA Staff:

Assigned PSEG Staff:

Ranking: Moderate

Margaret Keane - Executive Sponsor;

Anthony Stallone - Team Leader

Michael Simione, Director of Transmission and Distribution System Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

PSEG Long Island views this recommendation as having been fully implemented for the reasons described below.

Deliverable:

In January 2018, changes were implemented to the calculations of Risk and Contingency (R&C) and Levels of Estimate for capital projects. The previous level of estimates and R&C was very conservative and would tie significant amount of the budget in reserve. A more granular approach will lower the funds encumbered by R&C while maintaining the appropriate level of risk management.

The changes to the method of calculation are applied to specific estimate elements at each Level of Estimate for each project. The following method is now used when developing revised Risk and Contingency guidelines:

- Project Management: highly predictable and relatively unaffected by changing scope
- Design & Engineering: highly predictable cost and moderately impacted by scope changes
- Licensing & Permitting: relatively low percentage of project cost
- Equipment & Materials: moderately predictable cost and significantly impacted by scope changes
- Land & Land Rights: highly predictable cost and moderately impacted by scope changes
- Construction: moderately predictable cost and significantly impacted by scope and schedule changes

The above described method responds to each of the audit findings / recommendations identified below. Additionally, these deliverables also addressed the 2013 Recommendation 10.4.8, to incorporate contingency management in capital project cost estimating and cost management.

The following parts of the recommendation are addressed below:

- Review the project budgets and individual budget elements including management, design, and construction and project specific contingencies: Each of the budget elements as described above was reviewed and are included in the new Risk & Contingency Guideline Table below.
- Determine whether contingency levels were appropriately evaluated and reviewed in each evolution of project estimating and each project stage: Contingency levels are being evaluated at each project stage, and the Risk & Contingency Guideline Table is used to apply contingency amounts to estimated costs.
- Relate contingency levels with recognized uncertainty and risks at specific levels of planning, design and construction: The new Risk & Contingency Guideline Table (see below) relates the contingency with recognized uncertainty and risks at each level of estimate and for each cost element (project management, design and engineering, licensing and permitting, equipment and materials, land procurement and construction)
- Evaluate project design for unforeseen conditions that might arise or be discovered during the design process and whether these conditions fall within the original project scope (i.e., the program requirements initially articulated by the user in the project definition stage): The unforeseen conditions that might arise or be discovered during the design process is covered by the project cost contingency under Construction and Equipment & Materials cost elements throughout each project stage (level of estimate) see Risk &

Contingency Guideline Table below.

• Establish and formalize project cost contingency to cover additional project detail such as unforeseen site conditions, interference, delays or other circumstances that would not have been known at initiation, and expanded or changed project scope not identified during the scope definition phase: The project cost contingency for any unforeseen site conditions, interference, delays or other circumstances that were not known at initiation of a project is covered under Construction cost element throughout each project stage (level of estimate) – see Risk & Contingency Guideline Table below. This recommendation has been completed.

Risk and Contingency Guideline Table

Description	order of magnitude	conceptual estimate	design estimate	definitive estimate
Project Mgmt/Admin	10%	10%	5%	5%
Design and Engineerin	g 20%	15%	10%	5%
Licensing and Permitti	ng 30%	20%	10%	5%
Equipment and Materia	al 40%	20%	10%	5%
Land and Land Rights	20%	15%	10%	5%
Construction	40%	35%	30%	20%
Design and Engineerin Licensing and Permitti Equipment and Materia Land and Land Rights	g 20% ng 30% al 40% 20%	15% 20% 20% 15%	10% 10% 10% 10%	5% 5% 5% 5%

Deliverables/Milestones	Due Date	Status	Comments
Establish and formalize project cost	1/18/2018	Completed	
contingency to cover additional			
project detail such as unforeseen			
site conditions, interference, delays			
or other circumstances that would			
not have been known at initiation			
Evaluate project design for	1/18/2018	Completed	
unforeseen conditions that might			
arise or be discovered during the			
design process and whether these			
conditions fall within the original			
project scope			
Relate contingency levels with	1/18/2018	Completed	
recognized uncertainty and risks at			
specific levels of planning, design			
and construction			
	_		

Determine whether contingency	1/18/2018	Completed	
levels were appropriately evaluated			
and reviewed in each evolution of			
project estimating and each project			
stage			
Review the project budgets and	1/18/2018	Completed	
individual budget elements			
including management, design,			
construction and project specific			
contingencies			

Improving the project risk contingency levels and the application will lead to better allocation of the capital budget. The cost of the above-mentioned implemented actions are embedded in the cost to achieve improvements in our estimating process as noted in response to Recommendation 23 and is the following:

- Cost of three full time employees: \$450,000 per year (2 positions are filled, one position remaining to be filled)
- Cost of Sage implementation project: \$500,000 (one-time cost incurred July 2018); \$130,000 (annual software and system maintenance cost).

Risk Analysis:

The lack of an effective contingency management process will inflate the costs of individual capital projects and will diminish the effectiveness of the overall capital program.

Customer Benefit Analysis:

Improving risk and contingency levels will allow PSEG Long Island to better prioritize capital investments which will ultimately improve the reliability of the electric system.

Recommendation:

Define and report project management performance measures that focus on the effectiveness of cost estimation, earned value and schedule management. Project progress reports should be timely, and contain all information which is pertinent for their target audience. Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made.

- Have project managers actively monitor overall project progress against the baseline schedule and review cost versus progress and budget.
- Formalize project management performance reporting to LIPA and PSEG Long Island.
- Integrate cost and schedule systems with the project master schedule and the approved project budget.
- Develop a baseline schedule for every capital project showing the logical relationships, duration, and timing of the WBS elements for engineering and construction.
- Establish processes for systematic schedule preparation, review and analysis.
- Periodically, perform analyses of the initial establishment of operation/completion dates.
- Construction delivery strategy whether plans were developed and defined for construction contracting and long lead item equipment procurement.
- Phasing requirements determining the proper sequence and phasing of all proposed construction work on the project to ensure that construction was accomplished in the most economical manner while minimizing impact to operations.
- Integration of design, procurement and construction activities once phasing was determined, whether all activities concerned with design, procurement, construction, start- up and operation, and the entire scope of work was clearly defined and integrated.
- Milestones identification of important milestone dates establishing a basis for the implementation of the project work plan.
- Periodically reassess processes used to obtain actual project schedule data used to determine the status of the project against key milestones, and the accuracy of information on the progress of individual/critical project elements.
- Formalize processes to address proposed and actual revisions to the project schedule, and use of the scheduling system to identify possible solutions for schedule recovery.
- Highlight:
- Project cost variances
- Schedule variances
- Committed costs and actual costs to date
- Estimated cost at completion

- Capital budget impact
- Trends
- Pending and approved scope changes
- Earned value, or other measurements of cost and schedule performance.

Assigned LIPA Staff:	Assigned PSEG Staff:
Michael Simione, Director of Transmission and Distribution System Oversight	Margaret Keane - Executive Sponsor; Anthony Stallone - Team Leader
LIPA Executive:	Ranking:
Rick Shansky, Senior Vice President of Power	High
Supply and Wholesale Markets	

Objectives and Assumptions of the Recommendation:

Project progress reports should be timely and contain all information which is pertinent for their target audience. Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made. PSEG Long Island will enhance its project management process to build upon its existing capabilities.

Deliverable:

The key steps of the work plan are as follows:

• Define project management performance measures, which highlight project cost variances, schedule variances, committed costs and actual costs to date, estimated cost at completion, capital budget impact, trends, pending and approved scope changes, earned value, or other measurements of cost and schedule performance.

- Evaluate reporting tools, source data and opportunities for integration.
- Develop reporting tool and performance measurement dashboard.
- Develop guidelines and/or procedures.
- Implement performance measurement for all capital projects and programs.

• Train applicable Project Management Office (PMO) and Projects& Construction personnel and key stakeholders.

Additionally, these deliverables will also address the 2013 Recommendations: 10.4.4, to define project management performance measures focusing on the effectiveness of cost estimation and scheduling. Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made; 10.4.7, to develop a capital project cost forecasting/trending capability, 10.4.10, to improve periodic capital progress reporting; 10.4.12, to perform capital project schedule management.

PSEG Long Island will define project management performance measures that direct focus on the effectiveness of cost estimation, earned value and overall project performance, including schedule management and reporting.

• Cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made. (This also addresses the portion of the 2013 Recommendation 10.4.4, for cost estimates and schedules developed for preliminary plans should be evaluated when a project is complete to determine where further enhancements to project estimating can be made).

• The implementation of measures to verify the accuracy of estimates versus the actual project cost and maintain a record of updates to the estimating database is in progress.

• Material cost is being monitored against historical cost and the estimating database is being updated (part of the current estimating process).

• Contractor cost monitoring is improving and internal labor cost validation is still in progress.

• Formalize project management performance reporting to LIPA and PSEG Long Island. (Addresses the portion of the 2013 Recommendation 10.4.4- to define project management performance measures focusing on the effectiveness of cost estimation, scheduling; 2013 Recommendation 10.4.7- to develop a capital project cost forecasting/trending capability; and 10.4.10- to improve periodic capital progress reporting.)

• PSEG Long Island has implemented tier II LIPA reporting metrics for Capital Project management. These include individual metrics for budget forecast accuracy and schedule accuracy based on scheduled milestones achieved.

• In 2018, an additional metric has been added to track and measure estimate accuracy.

• Integrate cost and schedule systems with the project master schedule and the approved project budget.

• PSEG Long Island currently uses SAP for cost management, SAGE for estimating and Primavera P6 for scheduling. Evaluate and determine the feasibility of software capabilities of automating the integration of cost, estimating and schedule systems.

• Develop a baseline schedule for every capital project showing the logical relationships, duration, and timing of the WBS elements for engineering and construction.

• Effective in 2018 major capital projects have a well-defined baseline schedule showing the logical relationships, duration, and timing of the WBS elements for engineering and construction.

• PSEG Long Island established processes for systematic schedule preparation, review and analysis.

• Establish processes for systematic schedule preparation, review and analysis. (Addresses the portion of the 2013 Recommendation 10.4.12- to perform capital project schedule management.)

• Project schedules are created in Oracle P6 software using a standard WBS template and are updated as needed with each revision archived as a pdf.

• Formalize processes to address proposed and actual revisions to the project schedule, and use of the scheduling system to identify possible solutions for schedule recovery.

• PSEG Long Island has in place Oracle P6 Scheduling Software for schedule management. Project schedules and associated activities are updated monthly in Oracle P6 scheduling software to determine activity status, percent completed, actual man-hours, schedule recovery and activity closeout. These schedules are archived to the project folder.

Deliverables/Milestones	Due Date	Status	Comments
PSEG Long Island has in place	6/1/2018	Completed	
Oracle P6 Scheduling Software for			
schedule management. Project			
schedules and associated activities			
are updated monthly in Oracle P6			
scheduling software to determine			
activity status.			
Effective in 2018 major capital	6/1/2018	Completed	
projects have a well-defined			
baseline schedule showing the			
logical relationships, duration, and			
timing of the WBS elements for			
engineering and construction. PSEG			
Long Island established processes.			
Material cost monitored against	9/1/2018	Completed	
historical cost and the estimating			
database updated.			
Implement tier II LIPA reporting	9/1/2018	Completed	
metrics for Capital Project			
management, including individual			
metrics for budget forecast accuracy			
and schedule accuracy based on scheduled milestones achieved.			
	10/21/2010	<u> </u>	
Add tier II LIPA reporting metric	12/31/2018	Completed	
for Capital Project management to track and measure estimate			
accuracy.			
Evaluate improved reporting tools,	8/1/2010	Completed	
source data and opportunities for	0/1/2019	Completed	
integration.			
Define/enhance project	8/1/2019	Completed	
management performance measures	0/1/2017	Completed	
by reviewing existing Tier II metrics			
Develop improved guidelines	8/30/2019	Completed	
and/or procedures.	0/30/2017	completed	
Contractor cost monitoring is	9/1/2019	Completed	
improving and internal labor cost	7/1/2017	completed	
validation is still in progress.			
Train applicable PMO and Projects	9/30/2019	Completed	
& Construction personnel and key	7/30/2017	Compicióu	1
stakeholders.			
	1		

Implement performance	10/25/2019	Completed
measurement for all capital projects		
and programs.		
Evaluate and determine the	12/31/2019	O Completed
feasibility of software capabilities		· · ·
of automating the integration of cost		
and schedule systems.		
Determine effectiveness, conduct	12/31/2019	O Completed
lessons learned and identify		
corrective measures.		

New and enhanced performance measurement measures will result in additional activities and potentially require additional software and systems. As the detailed implementation plans are being developed, it is premature to estimate the cost to achieve.

Benefits: Implementing new and enhanced performance measurement measures will result in the more effective use of capital and increased project management performance and measurement, including:

- Enhanced project scheduling and execution
- Improved estimating tools
- Identification and implementation of best-practices and lessons learned thereby improving performance
- Better project management and oversight
- Improved collaboration of team members
- Better project cost and schedule control
- Better risk management
- Improved standardized reporting capabilities for project team and utility management

Risk Analysis:

Lack of performance measurement will reduce control of capital budget resources and will degrade project management performance.

Customer Benefit Analysis:

Performance measurement will provide better control and use of capital budgets and will improve project management performance resulting in the benefits noted above.

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Item Status In Progress

Recommendation:

Develop an integrated a work management system covering all PSEG Long Island operations, maintenance and construction resources that are based on engineered time standards and cover routine operations, repetitive maintenance activities, planned work, support requirements, and provide continuous feedback on workforce effectiveness. The system should be in an easy-touse format expressed in man-hours, along with the combined employee and contractor capacity available to perform the work, supported by real time reporting of capacity utilization. The system should include:

•Documentation of work level versus resource histogram development and work plan process.

•Enhanced methods to calculate workforce capacity and utilization.

•Expanded workforce coverage in reports.

•Documentation of processes for establishing workforce levels.

- •Documentation of criteria for adding contractor capacity.
- •Establish real time variance reporting for O&M and project costs.

•Additional decision-making information to work plan.

Assigned LIPA Staff:	Assigned PSEG Staff:
Michael Simione, Director of Transmission and Distribution System Oversight	John O'Connell - Executive Sponsor; Joseph Cicalo - Team Leader
LIPA Executive:	Ranking:
Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets	High

Objectives and Assumptions of the Recommendation:

This implementation plan covers recommendations #27 and #28 and is identical to the plan for #28.

PSEG Long Island will identify and document existing and future management information/reporting and work management processes/systems, including potential near term and longer term enhancements. The overall objective is to achieve cost-effective improvements in efficiency. Our assumption is that efficiency improvements will allow us to complete required work at an overall reduced cost.

Deliverable:

Three stages of enhancements (short-term, mid-term and long-term) will be provided to three key areas:

- -Information and reports -Processes and
- -Systems

Currently PSEG Long Island utilizes CMMS for managing assets, Primavera (P6) for scheduling, SAP work management and SAP financials for costs and SAGE for estimating. We will review the current use of these systems and look for enhancements that will improve

overall efficiency within the business. Key deliverable components include time (productivity) standards, organizational effectiveness measures and capacity analysis (visibility to desired work vs. available resources). Additionally, deliverables will provide insight into the drivers of inefficiency.

Enhancements in visibility and reporting will occur in the following areas:

- Employee planned availability vs. actual availability
- Contractor planned availability vs. actual availability
- Work level vs. resource histograms
- Capacity utilization reporting
- Workforce effectiveness measures
- Workload level trending
- Unit cost reporting
- Timely GIS updates of fixed asset records
- Electronic completion records
- Electronic inspection records

Document formal work management practices for:

- Scheduling
- Prioritization and planning
- Resource allocation and leveling
- Performance measurement
- Budget planning and control
- Vendor tracking
- Document/drawing control
- Pertinent records management

This action plan addresses item #27 and #28, as well as 2013 audit items 13.4.1 and 13.4.2.

Deliverables/Milestones	Due Date	Status	Comments
Identify and document existing	1/1/2019	Completed	
management information, work			
management processes, and work			
management systems, and future			
required management information.			
Identify mid-term enhancements	7/1/2019	Completed	
that can be implemented by			
7/1/2020 and prepare of list of			
targeted enhancements. Create a			
milestone schedule for			
implementation. Cost benefit			
analysis to be provided.			

Implement short-term	7/1/2019 Completed
enhancements by 7/1/2019 and	
prepare summary of changes	
implemented.	
Identify long term enhancements	7/1/2020 Completed
that can be implemented by	
7/1/2021 and prepare a list of	
targeted enhancements. Create a	
milestone schedule for	
implementation. Cost benefit	
analysis to be provided.	
Implement mid-term enhancements	7/1/2020 Completed Completed
by 7/1/2020 and summarize	
implemented enhancements.	
Implement long term enhancements	7/1/2021 Not Started
by 7/1/2021 and summarize	· · · ·
implemented enhancements.	

The cost to develop and implement an integrated work management system will be significant. Expenditures of the magnitude of \$20,000,000 could be required. Given the large capital and O&M expenditures in the company, small improvements in efficiency can quickly pay back investments of this magnitude and greater.

Actual cost and benefit amounts will be developed for individual components of the proposed solutions and will guide approvals and implementations.

Risk Analysis:

Risk will be mitigated by striking the correct balance between too little or too much work management focus. Under delivery will not achieve optimal benefits. Over delivery will not optimize the cost of overall efforts.

Customer Benefit Analysis:

Improved efficiency will result in the required work occurring at lowest reasonable cost, thereby mitigating billing impacts to the customer. Additionally, enhanced work management information will allow for better scheduling and communication of customer driven work.

A detailed Cost Benefit Analysis will be provided when investment decisions are made for each of the short, medium, and long-term enhancements described above.

Item Status In Progress

Recommendation:

Fill gaps in the current management information reporting and organizational reporting relationships to support an integrated work management system.

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•Develop formal reports on trends in work load levels, workforce productivity and utilization. The analysis of these trends identifies areas that are performing well, where improvements are needed, and is a foundation for the development of strategies to improve work force performance.

Establish formal processes to use work management data for annual resource planning as part of the annual business planning activities of PSEG Long Island operations and maintenance.
Develop formal work management practices for PSEG Long Island engineering and design functions. The work management systems should have appropriate system tools to support the various individual and distinct engineering functional processes. Elements that should be formalized include:

-Scheduling

- -Prioritization and planning
- -Resource allocation and leveling
- -Performance measurement
- -Budget planning and control
- -Vendor tracking
- -Document/drawing control
- -Records management
- -Procurement management
- -Time reporting

Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

John O'Connell - Executive Sponsor; Joseph Cicalo - Team Leader

Ranking:

High

Objectives and Assumptions of the Recommendation:

The Implementation Plan for Recommendation 27 also addresses Recommendation 28.

Deliverable:

See Recommendation 27.

Cost Benefit Analysis:

See Recommendation 27.

Recommendation:

Develop overtime targets for PSEG Long Island operations and maintenance organizations based on economic analyses and verified industry norms.

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Assigned LIPA Staff:

Donald J. Schaaf, Senior Manager of Emergency Response Oversight

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective of this initiative is to establish overtime targets with a basis from economic analysis and industry norms. Our assumption is that establishing overtime targets in this fashion will yield optimal cost benefit from the overtime hours worked.

Deliverable:

Deliverables are:

•Benchmark information on overtime levels.

- •Financial analysis indicating optimal levels of overtime from a financial perspective.
- •Proposed overtime level targets including when such targets should be effective.

Deliverables/Milestones	Due Date	Status	Comments
Establish team to review PSEG	1/31/2019	Completed	
Long Island overtime rates and			
perform market research.			
Identify industry norms for overtime	4/30/2019	Completed	
rates through comparison of			
industry peers.			
Perform cost/benefit analysis of	6/30/2019	Completed	
adjusting workforce to adjust			
overtime rates.			
Identify and develop appropriate	7/15/2019	Completed	
target.			
Establish the target and create an	8/31/2019	Completed	
implementation schedule			
Implement Schedule	12/31/2019	Completed	

Assigned PSEG Staff:

Item Status Completed

John O'Connell - Executive Sponsor; Joseph Cicalo - Team Leader

Ranking:

Moderate

The cost to make recommendations from financial modeling and industry modeling is estimated at \$250,000. Given the large amounts of overtime expended, as well as the large labor pool at PSEG Long Island, we expect that benefits will offset costs.

Risk Analysis:

The risk of not optimizing overtime is a risk of not realizing potential cost reductions.

Customer Benefit Analysis:

The customer will benefit from optimized overtime costs.

Recommendation:

Add KPIs for management positions. Review the design of monitoring and controlling reports to improve their usefulness.

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Assigned LIPA Staff:

Barbara Ann Dillon, Esq., PHR, Director of Human Resources & Administration

LIPA Executive:

Bobbi OConnor, Chief Administrative Officer & Board Secretary

Objectives and Assumptions of the Recommendation:

A KPI (Key Performance Indicator) is a measurable value that demonstrates how effectively the utility is achieving key business objectives. Organizations use KPIs at multiple levels to evaluate their success at reaching targets.

Our objective is to cost effectively establish the right mix of KPIs and associated reporting within PSEG Long Island.

Deliverable:

- A list of which positions will have KPIs, and the KPIs for those positions
- A list of which positions will not have KPIs with the accompanying rationale
- A list of what level of reporting will exist for positions with KPIs
- Implemented reporting in accordance with deliverable due 9/30/19 (review existing KPIs and existing job descriptions.)

Deliverables/Milestones	Due Date	Status	Comments
Review existing reporting capabilities and identify reporting that can support KPI reporting at manager and supervisor levels	1/1/2019	Completed	Reviewed current T&D tier 1 and 2 goals and reporting capabilities. Identified potential level for cascading scorecard measures to supervision/management levels.
Identify and list all management positions. Indicate any that already have KPIs	1/1/2019	Completed	Listed all MAST positions and reviewed sample of 27 MAST positions for KPIs in current requisition.
Review existing KPIs and existing job descriptions and identify which job descriptions will receive new KPIs and which job descriptions will receive KPI level reporting	9/30/2019	Completed	

Item Status Completed

Assigned PSEG Staff:

Ranking: Low

John O'Connell - Executive Sponsor;

Nicholas Nolau - Team Leader

List those management positions	10/1/2019 Completed
that KPIs were not added to and an	
explanation why they were not	
included for those roles (summary)	
Add KPIs to job description,	10/1/2019 Completed
communicate to impacted	
employees and begin KPI level	
reporting	

Establishment of KPIs for appropriate positions will have nominal/minimal cost. PSEG Long Island will review reporting enhancements, which could have significant cost, and determine the appropriate level of reporting based on expected cost/benefit.

Risk Analysis:

Not implementing the appropriate level of KPIs will result in less than optimal performance and results.

Customer Benefit Analysis:

Implementation of this recommendation will result in the following benefits: Improved performance, potential improvements in employee morale associated with increased communication.

Item Status Completed

Recommendation:

At the time of the next bill redesign, revise bill formats to include missing information required by 16 NYCRR Parts 11 and 13 (e.g., definition of kW, late payment date line and an explanation as to how the bill can be paid).

Assigned LIPA Staff:

Theresa Bonavolonta,

LIPA Executive:

Assigned PSEG Staff:

Richard Walden - Executive Sponsor; Brigitte Wynn - Team Leader

Ranking:

Low

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

A review of the customer bill revealed three missing data points that are required by NYCRR Parts 11 and 13.

• Late payment line and date to be added to TOU (MRP1) bills

• kW definition to be added to definition section

• New bill message by customer service center area will be added and appear on each bill identifying the customer center in the customers area

Deliverable:

The recommendations for three items to be added to the bill have been reviewed and have been placed into the Customer Accounting System (CAS) Continuous Improvement Project to be completed in 4Q 2018. These are not complex changes.

Deliverables/Milestones	Due Date	Status	Comments
Bill Changes Reviewed / Scheduled	7/20/2018	Completed	
Development	11/15/2018	Completed	
User Acceptance Testing	11/21/2018	Completed	
Sign Off	11/28/2018	Completed	
Go Live Production	11/30/2018	Completed	

The cost of enhancements is \$75,000. There are no direct cost benefits; however, including this new information on customer bills will ensure compliance with HEFPA.

Risk Analysis:

The project is dependent on the timely completion of the annual rate change as both projects will utilize the same technical resources and bill print modules.

Customer Benefit Analysis: N/A

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Recommendation:

Issue denial of service notices as required by 16 NYCRR Parts 11 and 13. Offer payment arrangements as required by Part 11.

Assigned LIPA Staff:

Theresa Bonavolonta,

LIPA Executive:

Assigned PSEG Staff: Richard Walden - Executive Sponsor;

Brigitte Wynn - Team Leader

Ranking:

Low

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective of this recommendation is to ensure that PSEG Long Island is consistently offering payment agreement plans, in writing, to applicants owing money on previous accounts in the Denial of Service notice procedure as HEFPA requires. Issue a "Denial of Service" to applicants in situations when they are told that they must go to the office and provide additional information.

Deliverable:

HEFPA section 11.3(b) requires that customers be given a written notice when their application for service is denied.

The notification must state the reason(s) for the denial, what the applicant must do to qualify for service and the customer's right to appeal to DPS.

PSEG Long Island's project team created a procedure requiring that a "denial of service" notification be sent to every customer that is "denied" service.

Deliverables/Milestones	Due Date	Status	Comments
Project team established.	7/10/2018	Completed	
Project team reviewed PSEG Long Island current Denial of Service notice as well as notices used by other utilities (Con Ed and National	7/13/2018	Completed	
Grid).			
New Denial of Service notice, that includes payment plan information, was drafted by the project team and sent to Marketing for formatting and branding.	7/27/2018	Completed	

Draft of Denial of Service Notice	8/3/2018 Completed
and process document were sent to	· · ·
Legal for review.	
Project team drafted a process	8/4/2018 Completed
document for the Denial of Service	· · · ·
notices for representatives to follow.	
Updated Denial of Service Notice	8/8/2018 Completed
and process implemented.	· · ·

There are no direct cost benefits. Implementation of this recommendation is required to comply with HEFPA.

Risk Analysis: None

Customer Benefit Analysis:

Customers will benefit from the implementation of this recommendation as documenting the payment agreement option on the notice will more clearly define all options available to the customer in support of their application for service.

Item Status Completed

Recommendation:

Revise the processes used by PSEG Long Island to respond to complaints received by the Department of Public Service (DPS) as follows:

- Create a case file checklist to include in case files to ensure documentation is complete.
- Develop an integrated program management approach to ensure customers are provided information on all programs available to them. One approach would be to create customer profile worksheet with cross reference to applicable programs and/or relevant protections.
- Eliminate practice of hand calculations and implement use of excel template calculators. Modify the "DPS Complaint Response Form" to include:
 - Time and date customer complaint was created
 - Applicable customer contact timeline (e.g. 2-hour, next day etc.)
 - Time and date customer was contacted
 - Any special protections or customer assistance programs the customer was referred to
 - Date form submitted to DPS.

• Implement a process to ensure PSEG Long Island includes copies of the DPS customer close out letters in the case files.

Assigned LIPA Staff:

Theresa Bonavolonta,

Assigned PSEG Staff:

Ranking: Low

Richard Walden - Executive Sponsor; Brigitte Wynn - Team Leader

LIPA Executive:		
Rick Shansky, Senior Vice President of Power		

Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective of this recommendation is to improve the process for documenting and resolving customer complaints that are reported to the DPS.

Deliverable:

To implement this work plan, subject matter experts from the PSEG Long Island Customer Relations team and Quality Assurance teams will work together to review the audit recommendation and develop an action plan to ensure that it is implemented in a timely manner. The action plan will be reviewed by the Director of the Customer Experience for accuracy and thoroughness prior to implementation.

Hand calculations are only the notes taken in the field. Excel calculators are then used to work up the final figures.

Deliverables/Milestones	Due Date	Status	Comments
Establish project team	7/9/2018	Completed	
Review audit finding and develop	7/12/2018	Completed	
version 1 of action plan			
Modify "DPS Complaint Response	7/16/2018	Completed	
Form" to include new data fields as			
requested in audit recommendation			
Create case file checklist	7/16/2018	Completed	
Finalize action plan (i.e. action	7/29/2018	Completed	Step reworded to clarify action
plan is completely defined)			item
Train Customer Relations team on	7/29/2018	Completed	
new case file checklist, modified			
DPS complaint response form, and			
close out letters (where applicable)			
DPS close out letters	8/21/2018	Completed	July 30, 2019 Update:
			This step is no longer
			applicable.
Create customer profile worksheet	8/21/2018	Completed	
Create file checklist	8/21/2018	Completed	
Create excel spreadsheet template	10/29/2018	Completed	The Customer Relations team
to calculate billing adjustments		-	has been trained on all required
where applicable			documentation for all
	-		calculations.
Train Customer Relations team on	10/29/2018	Completed	The excel spreadsheets were
all required documentation for all			created and implemented
calculations			

There are no additional costs. Implementation of this recommendation is required to comply with DPS regulations.

Risk Analysis: None.

Customer Benefit Analysis:

Customers will benefit from the implementation of this recommendation as follows:

- More consistent application of the issue resolution process (resulting from the implementation of checklists for each case file to ensure thorough documentation of the process).
- Possibly access to more programs, protections, and options (resulting from the implementation of a cross-reference worksheet).
- Better case documentation throughout the process should there be a need to refer back to the customer file as a result of an escalated complaint or future inquiry on the same case.

Recommendation:

Modify the CTS system to improve DPS complaint tracking and reporting ability. Add data fields including:

• The original source of complaints referred by DPS (i.e., direct from customer, Consultant, Government Official/Executive Correspondence).

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- Customer contact deadline.
- Closeout deadline.
- Resolution status field to differentiate between cases that are "Resolved and Closed" vs "Unresolved and Closed"
- Indication the case is "Pending completion of future work" to allow for active follow-up.
- Modify the Date Opened field to allow for capturing of time of day a case is created.
- Modify Date Contacted field (default time of day set at 0:00) to force user to adjust time. Adjust internal processes to ensure data entry into this field.

Theresa Bonavolonta.

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective of this recommendation is to ensure that the Complaint Tracking System (CTS), used by the Customer Relations team to document and work customer complaints reported to the DPS, has the functionality needed for optimal work flow and reporting.

Deliverable:

To implement this work plan, subject matter experts from the PSEG Long Island Customer Relations team, Information Technology team, and Quality Assurance teams will work together to review the audit recommendation and develop an action plan to ensure that it is implemented in a timely manner. The action plan will be reviewed by the Director of the Customer Experience team for accuracy and thoroughness prior to implementation.

The work plan was completed on 9/28/2018.

Deliverables/Milestones	Due Date	Status	Comments
Establish project team	7/9/2018	Completed	
Review audit finding and develop	7/12/2018	Completed	
version 1 of IT requirements			
Review IT requirements for	7/16/2018	Completed	
additional clarity and refinement			

Item Status Completed

Ranking: Moderate

Assigned PSEG Staff:

Richard Walden - Executive Sponsor; Brigitte Wynn - Team Leader

Get delivery date from IT team	8/1/2018	Completed
Begin IT work	8/13/2018	Completed
End IT work	9/14/2018	Completed
Test IT changes made to CTS	9/21/2018	Completed
Complete action plan (i.e.	9/28/2018	Completed
recommendation fully implemented)		
Reserved time for IT rework and	9/28/2018	Completed
retesting (if needed)		

The cost of enhancements is \$6,500. There are no direct cost benefits. Implementation of this recommendation will improve compliance with with DPS regulations.

Risk Analysis: None

Customer Benefit Analysis:

Customers will benefit from better case documentation throughout the process should there be a need to refer back to the customer file as a result of an escalated complaint or future inquiry on the same case.

Recommendation:

Implement a Quality Assurance Program in Customer Relations. Recommended items for review include:

- Data is entered in CTS
- CAS diary entry includes the time customer contact occurred
- Case files are completed
- Appropriate tools and methodology are being used to calculate adjustments
- Consistent treatment of customers with similar issues
- Customers complaint concerns appropriately addressed
- DPS Complaint Response Form is used to track response to DPS cases.

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Assigned LIPA Staff:	Assigned PSEG Staff:
Theresa Bonavolonta,	Richard Walden - Executive Sponsor;
	Brigitte Wynn - Team Leader
LIPA Executive:	Ranking:
Rick Shansky, Senior Vice President of Power	Low

Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

The objective of this recommendation is to ensure that the processes for documenting and resolving customer complaints that are reported to the DPS are being followed and executed consistently across the Customer Relations Department.

Deliverable:

To implement this work plan, subject matter experts from the PSEG Long Island Customer Relations team and Quality Assurance teams will work together to review the audit recommendation and develop an action plan to ensure that it is implemented in a timely manner. The action plan will be reviewed by the Director of the Customer Experience team for accuracy and thoroughness prior to implementation.

The work plan was completed on 8/22/2018.

Deliverables/Milestones	Due Date	Status	Comments
Establish project team	7/9/2018	Completed	
Review audit finding and develop	7/12/2018	Completed	
version 1 of action plan			
Identify QA resource to begin	7/16/2018	Completed	
monthly QA audit process			
Develop QA checklist	7/16/2018	Completed	
Select files to be audited	7/18/2018	Completed	

Conduct QA audit to include all	7/20/2018 Completed
items in the "recommended items	
for review" list	
Prepare QA audit report	7/24/2018 Completed
Finalize implementation of action	7/29/2018 Completed
plan (i.e. action plan is completely	
implemented)	
Implement Quality Assurance	8/22/2018 Completed
program in Customer Relations	

There are no direct cost benefits. Implementation of this recommendation is required to comply with DPS regulations.

Risk Analysis: None

Customer Benefit Analysis:

Customers will benefit from the implementation of this recommendation as follows:

- Better case documentation throughout the process should there be a need to refer back to the customer file as a result of an escalated complaint or future inquiry on the same case.
- Opportunities for additional training of Customer Relations personnel should the Quality Assurance process identify inconsistencies in the issue resolution process.

Recommendation:

Measure the effectiveness of capital-project outreach, media relations and external affairs programs, to determine whether outreach efforts are cost-efficient, on target, and achieving results. Potential measurement options include surveys, focus groups, a media clip index, or attendance at public meetings

Assigned LIPA Staff:

Sid Nathan, , Michael Deering, Senior Advisor for External Affairs

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

Christopher Hahn - Executive Sponsor; Joanna Weissman - Team Leader

Ranking:

Low

Objectives and Assumptions of the Recommendation:

The objective of measuring outreach, media relations, and our external affairs programs is to enhance timely and accurate communications to our customers and stakeholders. PSEG Long Island monitors the effectiveness of our communications efforts through a range of indicators, including but not limited to customer and government official feedback; customer satisfaction as measured through the JD Power survey; ongoing monitoring of media coverage and maintenance of a media clip index; ongoing monitoring and tracking of media sentiment; customer focus groups and interviews on targeted subjects including infrastructure communications; and review of formal complaints to the Department of Public Service.

To more regularly measure the effectiveness and cost-effectiveness of our capital project and external affairs communications efforts, PSEG Long Island seeks to implement a recurring, targeted set of measurement tools that will be folded into a scorecard that evaluates whether outreach efforts are cost-efficient, on target, and achieving results. These recurring targeted measurements will enable the external affairs and communications teams to gauge the effectiveness of ongoing improvements in our communications to our customers. The scorecard will be based on discussions with key external affairs stakeholders and will be implemented after a pilot period to allow for learning and confirmation of effectiveness of measurement tools.

Deliverable:

A team of PSEG Long Island External Affairs staff will identify a set of stakeholders in the capital project outreach process. These stakeholders will be comprised of internal and external representatives, and may include state and local elected officials or their designees; New York State agencies and/or authorities; customers; other utilities, and PSEG Long Island staff from a range of business areas. The External Affairs team will garner feedback about how stakeholders describe a successful outreach campaign and seek recommendations about how to measure outreach success and cost effectiveness. Based upon feedback gathered through the interviewing process, External Affairs will develop and pilot an Outreach Scorecard measuring

Item Status Completed

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the performance of outreach campaigns on the selected metrics. After a six-month pilot, the External Affairs team will review the effectiveness of the pilot scorecard. The team will improve upon scorecard metrics based upon lessons learned during the pilot. The Outreach Scorecard will be fully implemented in early 2020.

Deliverables/Milestones	Due Date	Status	Comments
Meet with stakeholders to gather	3/15/2019	Completed	
input into outreach goals and			
potential measures of outreach			
effectiveness			1
Develop a template scorecard	6/15/2019	Completed	
containing metrics on outreach			
effectiveness, cost-efficiency, and			
appropriateness of outreach			
targeting			1
Implement outreach scorecard for a	12/15/2019	Completed	
six-month pilot period commencing			
June 2019 and ending December			
2019			
Finalize public outreach scorecard	3/15/2020	Completed	
based on findings from pilot period,			
summarize pilot findings			

Cost Benefit Analysis:

The project will be fully implemented using in-house labor. Implementation is anticipated to take 300 hours to develop both tools at a cost of \$118 per hour, for a total of approximately \$35,400.

No direct cost benefits are associated with this initiative. Customers will ultimately benefit through improvements in project communications and outreach.

Risk Analysis:

Without a comprehensive set of measures of outreach effectiveness, PSEG Long Island may miss strategic opportunities for process improvement that may in turn expand customer awareness of capital investments.

Customer Benefit Analysis:

Assessing the effectiveness of our capital project outreach and media communications will reveal opportunities to improve outreach efforts. Improved outreach will improve customer awareness of our reliability efforts and planned work in the community; will help to mitigate potential concerns about projects; and will foster PSEG Long Island's relationship with customers and stakeholders in the community.

Recommendation:

On a pilot basis, evaluate the potential use and effectiveness of text messages and phone calls to customers on scheduled tree trim routes.

Assigned LIPA Staff:

Sid Nathan, , Michael Deering, Senior Advisor for External Affairs

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Our objective is to determine the value of text and phone based customer notifications for scheduled tree trimming.

Deliverable:

A pilot program that quantifies cost and benefits and recommends future use of this option for customer notification.

Deliverables/Milestones	Due Date	Status	Comments
Set up a process for text	1/29/2019	Completed	
notifications			
Manage the process for a period of	7/31/2019	Completed	
time and evaluate the pros and cons.			
Make decision for future	9/1/2019	Completed	
implementation.			

Cost Benefit Analysis:

Cost of the pilot is nominal / minimal. Cost and benefit of full deployment will be determined via the pilot.

Risk Analysis: Risk of this pilot is nominal / minimal.

Customer Benefit Analysis:

The customer will benefit from improved communication.

John O'Connell - Executive Sponsor; Mark Cerqueira - Team Leader

Item Status Completed

Assigned PSEG Staff:

Ranking:

Low

Recommendation:

Measure the effectiveness of energy efficiency and low-income programs, and outreach and marketing efforts.

Assigned LIPA Staff:	Assigned PSEG Staff:		
Sid Nathan, , Michael Deering, Senior Advisor for External Affairs	Richard Walden - Executive Sponsor; John Miro- Team Leader		
LIPA Executive:	Ranking:		

Objectives and Assumptions of the Recommendation:

The purpose of the action plan is to (1) measure the effectiveness of low income program communications and outreach amongst PSEG Long Island's low-income population, and (2) to leverage learnings to improve the outreach effort.

The objective of the plan is to increase low-income customer's awareness and understanding of applicable low-income programs.

Deliverable:

The plan will be implemented through collaboration between various areas and subject matter experts (SMEs) that touch our low-income customer base. The team will work to identify target populations of eligible program participants and deploy a baseline survey to prospects. A bi-annual survey will be conducted to measure impact and effectiveness of communication efforts.

Metrics:

In order to measure the effectiveness of the proposed 2019 communication effort to raise lowincome customer awareness of our energy efficiency and low income programs, the following metric and milestones are being developed/tracked:

1.Baseline awareness survey – this survey will be conducted among a sample population of the low-income customer base to determine a baseline target of customer awareness of our programs. The survey will ask customers about their awareness of these programs, how they consume information from their utility and through what communication channels. Milestone: initial survey results -10/29/2018

2.Mid-year awareness survey – this survey will take place after communications have been in market over the first half of 2019 to measure changes/improvements to the baseline awareness metric. The goal at the mid-year survey will be to increase awareness by 5% over the baseline target.

Milestone: 7/08/2019

3. Year-end awareness survey - this checkpoint survey will again measure changes /

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improvements in low-income customer awareness versus the baseline survey. The goal at the year-end survey will be to increase awareness by 10% over the baseline target. Milestone: 11/08/2019

Deliverables/Milestones	Due Date	Status	Comments
Establish project team, hold kick-	8/2/2018	Completed	
off meeting			
Develop program-eligible customer	8/24/2018	Completed	
prospect profiles			
Cross reference profiles with	9/24/2018	Completed	
existing one million customer			
database & 3rd party data to identify			
eligible program participants			
Identify best low income customer	10/29/2018	Completed	
communications channels			
Develop and execute baseline	11/9/2018	Completed	
awareness study – report findings			
Create communications plan based	11/30/2018	Completed	
on survey feedback, channel			
selection and target populations			
Communications collateral &	12/21/2018	Completed	
material development			
Begin communication plan	1/14/2019	Completed	
execution			
Develop, execute mid-year	7/8/2019	Completed	
awareness evaluation survey, report			
findings			
Develop, execute year end	11/8/2019	Completed	
awareness evaluation survey, report			
findings	ļ,		
Develop and modify annual	11/29/2019	Completed	
communication plan as necessary,			
evaluation survey, report findings			

Better/more effectively targeted marketing efforts could reduce the costs of the current marketing activities. Increased market penetration and understanding of saturation levels could potentially lead to higher program participation. Better recall of PSEG Long Island's marketing efforts could increase customer satisfaction and raise JD Power scores.

Risk Analysis: None

Customer Benefit Analysis:

Raising awareness of our low income programs would allow qualifying customers to take advantage of programs that could help them lower their energy costs.

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Item Status Completed

Recommendation:

Develop a more formalized process for determining the outreach budgets for capital projects, particularly Tier 3 and high scoring Tier 2 projects

Assigned LIPA Staff:

Assigned PSEG Staff:

Ranking: Low

Christopher Hahn - Executive Sponsor;

Joanna Weissman - Team Leader

Sid Nathan, , Michael Deering, Senior Advisor for External Affairs

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Accurate estimating of capital expenditures can facilitate better planning of capital investments. Major capital projects that are complex in nature may generate concern in the communities they will be located, and as such, require a greater outreach effort. Extensive outreach campaigns tend to be more costly in both labor and non-labor expenses. PSEG Long Island's current practice is to estimate labor hours associated with planned capital projects. PSEG Long Island has not in the past developed detailed estimates of non-labor expenses associated with outreach for planned capital projects. Developing and implementing a process to estimate the full cost of outreach for major capital projects will improve the overall accuracy of project cost estimates.

Deliverable:

In-house resources from the PSEG Long Island External Affairs and Estimating & Permitting departments will partner to expand upon existing project estimating processes. The project team will develop an Outreach Cost Matrix that estimates costs for resources frequently used during capital project outreach, including labor and non-labor resources. Project outreach budgets will be established for each construction project using the Outreach Cost Matrix that will be updated at estimate levels throughout the development of capital projects.

Due Date	Status	Comments
7/30/2018	Completed	
7/30/2018	Completed	
9/30/2018	Completed	
12/31/2018	Completed	
	7/30/2018 7/30/2018 9/30/2018	7/30/2018 Completed 7/30/2018 Completed 9/30/2018 Completed

Refine Outreach Cost Matrix based	1/15/2019 Completed
on pilot findings and move into	
production; summarize pilot	
findings	

The project was completed with in-house resources. To develop an Outreach Cost Matrix, the cost was approximately \$9,400 (80 hours at approximately \$118 per hour). To implement the Outreach Cost Matrix on an ongoing basis, the project is estimated to take approximately 100 hours per year at a cost of approximately \$118 per hour, for a total estimated annual cost of \$12,000.

While no direct cost benefits are associated with this initiative, implementation of the Outreach Cost Matrix will result in more accurate cost estimating and variance analysis.

Risk Analysis:

Without implementation of the Outreach Cost Matrix, outreach costs will continue to be approximated at a high level, resulting in additional variance in project cost estimates.

Customer Benefit Analysis:

Implementing a process to estimate the full cost of outreach for major capital projects will improve the overall accuracy of project cost estimates and will, in turn, enable PSEG Long Island to develop more accurate capital budgets and will improve the transparency of the capital planning and outreach processes.

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Item Status Completed

Recommendation:

Update the External Affairs Handbook to reflect recent lessons learned, the findings in

- NorthStar's report, the items cited below, and the other recommendation cited in [Chapter XII].
- Expand the discussion of project scoring.
- For all Tier 3 projects, update constituents as the project approaches its start date, or if there are significant project changes (e.g., scope, schedule, location/route, duration, or other item likely to impact the community such as overhead versus underground, pole heights, additional poles, traffic, outages). This is in addition to the annual update on the 5-year capital plan.

Assigned LIPA Staff:	Assigned PSEG Staff:
Sid Nathan, , Michael Deering, Senior Advisor for External Affairs	Christopher Hahn - Executive Sponsor; Joanna Weissman - Team Leader
LIPA Executive:	Ranking:
Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets	Low
	. •

Objectives and Assumptions of the Recommendation:

Public outreach regarding planned infrastructure investments allows community members and stakeholders an opportunity to learn about planned work in advance of construction start and provides community members with an opportunity to share feedback about projects. PSEG Long Island has developed and implemented a robust capital project outreach program. The program, described in the External Affairs Outreach Handbook, relies on External Affairs team members to review and score planned construction projects on a range of criteria, including:

- Project Need;
- Community Impacts;
- Government Dynamics;
- Media Environment;
- Permitting and Regulatory Requirements;
- Aesthetic Impacts;
- Environmental Impacts;
- Historical and Cultural Impacts; and
- Construction Considerations.

Recent regulatory and legislative changes have enhanced the outreach requirements for highvoltage transmission projects. While most of these new requirements are consistent with outreach practices that were historically completed at the External Affairs District Managers' recommendations, PSEG Long Island will be expanding upon and substantially revising the Outreach Handbook to formalize outreach practices consistent with these new requirements.

In addition, it is the current practice of External Affairs District Managers to update project scorecards, update outreach plans, and inform community stakeholders of significant changes to

earlier communications in the event that project designs or project schedules change. This practice will be formalized in the next version of the Outreach Handbook.

Finally, the Outreach Handbook will be updated to include additional modifications to outreach planning and execution, such as detailed non-labor outreach budgeting and web site maintenance. Accordingly, the Outreach Handbook will remain a consistent reference for the External Affairs team. The updated Outreach Handbook will also continue to provide regulators and community stakeholders with a transparent guide to PSEG Long Island project outreach practices. These enhancements will further document PSEG Long Island's strategy to communicate issues of significance to customers regularly and in a timely manner, particularly for Tier 3 projects, as recommended in the 2013 NorthStar audit item 15.4.5.

Deliverable:

The PSEG Long Island External Affairs team will work with an outside vendor to review and update the Outreach Handbook consistent with recommendations in the NorthStar report and recent lessons learned.

Deliverables/Milestones	Due Date	Status	Comments
Hold in-depth kick-off and review	12/15/2018	Completed	
session on existing and			^
recommended policies of the			
Outreach Handbook			
Vendor to prepare first draft of	2/28/2019	Completed	
updates to Outreach Handbook to			
reflect recommendations in Chapter			
XII as well as a discussion of			
compliance with recent regulatory			
and legislative changes			
Conduct review of first draft with	3/31/2019	Completed	
internal stakeholders			1
Vendor to prepare second draft of	5/15/2019	Completed	
Outreach Handbook consistent with			
review comments			
Conduct review of second draft	6/15/2019	Completed	
with internal stakeholders			
Vendor to prepare final draft of	7/15/2019	Completed	
revised Outreach Handbook			
consistent with review comments			
External Affairs team to review and	8/15/2019	Completed	
implement revised Outreach			
Handbook			

The project was completed by an outside vendor with guidance from in-house resources. Outside vendor costs were approximately \$75,000 over the nine-month timeline. In addition, the project took approximately 100 hours of in-house guidance and over site at approximately \$118 per hour, for an approximate cost of \$12,000.

Benefits include greater transparency and consistency around capital project outreach efforts.

Risk Analysis:

A clearly documented and regularly documented outreach process minimizes risk of loss of knowledge in the event of staff changes and also ensures that newly hired staff is provided with a comprehensive tool on departmental objectives and goals. This, in turn, ensures that customers will benefit from consistent, informative, and timely project outreach.

Customer Benefit Analysis:

Robust outreach in advance of planned system investments in the community enhances customer and stakeholder understanding of the importance of planned system investments. Outreach also allows stakeholders to express concerns in advance so PSEG Long Island can identify opportunities to mitigate community concerns.

Recommendation:

Formalize external affairs training program and enhance to include the following:

• Outreach expectations and requirements (e.g., frequency and information to be communicated)

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- Scoring methodology and application of the scoring rubric in a consistent, objective manner
- Documentation requirements
- The External Affairs Handbook and other policies and procedures
- Communication with the DPS
- When various outreach activities/communications methods are required or should be employed
- Developing budgets for capital project outreach.

Assigned LII A Stan.
Michael Deering, Senior Advisor for External
Affairs, Sid Nathan,

LIPA Executive:

Assigned I IDA Staff.

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Through a robust, consistent outreach process, External Affairs District Managers seek to provide timely, accurate information to customers and stakeholders in the communities we serve. External Affairs District Managers are the lead point of contact for PSEG Long Island communications with elected officials and their staffs on Long Island and the Rockaways. When District Managers are hired, they receive training that covers topics such as utility operations, the electric grid, storm response, vegetation management, and capital projects. As the work plans in this document are implemented, External Affairs team members will be trained on additional policies, procedures, and practices.

Deliverable:

Subcommittees of the PSEG Long Island External Team will develop training modules and conduct training for the full External Affairs team. Several recommended training will be developed once the subject matter is finalized, as described in other recommendation plans and as noted in the deliverables chart below.

Deliverables/Milestones	Due Date	Status	Comments
Hold Kick-Off Meeting and Assign	8/8/2018	Completed	
Training Modules to Subcommittees			
Establish Project Team	8/8/2018	Completed	
Develop Module 4: Communication	9/30/2018	Completed	
with the DPS Subcommittee			
develops draft Module 4			
	_		

Item Status Completed

Assigned PSEG Staff:

Christopher Hahn - Executive Sponsor; Joanna Weissman - Team Leader

Ranking:

Low

Develop Module 3: Documentation	10/31/2018 Completed
requirements. Subcommittee	· · · · ·
develops draft Module	
3	
Internal Stakeholder Review of	10/31/2018 Completed
Module 4	
Changes Incorporated and Module 4	11/15/2018 Completed
Finalized	
Internal Stakeholder Review of	11/30/2018 Completed
Module 3	
Develop Module 2: Scoring	11/30/2018 Completed
methodology and application of the	
scoring rubric in a consistent,	
objective manner. Subcommittee	
develops draft Module 2	
Conduct Training on Module 4	11/30/2018 Completed
Develop Module 1: Outreach	12/31/2018 Completed
expectations and requirements (e.g.,	
frequency and information to be	
communicated), When various	
outreach activities/communications	
methods are required or should be	
employed. Subcommittee develops	
draft Module 1	
Internal Stakeholder Review of	12/31/2018 Completed
Module 2	
Changes Incorporated and Module 3	12/31/2018 Completed
Finalized	
Changes Incorporated and Module 2	1/31/2019 Completed
Finalized	
Conduct Training on Module 3	1/31/2019 Completed
Subcommittee develops draft	2/15/2019 Completed
Module 5; developing outreach	
budgets for capital projects	
Internal Stakeholder Review of	2/15/2019 Completed
Module 1	
Internal Stakeholder Review of	2/28/2019 Completed
Module 5	
Conduct Training on Module 2	2/28/2019 Completed
Changes Incorporated and Module 5	3/15/2019 Completed
Finalized	

Changes Incorporated and Module 1	3/15/2019	Completed
Finalized		
Conduct Training on Module 5	4/15/2019	Completed
Conduct Training on Module 1	4/15/2019	Completed
Subcommittee develops draft	10/15/2019	Completed
Module 6; External Affairs		
handbook and other policies and		
procedures		
Internal Stakeholder Review of	11/15/2019	Completed
Module 6		
Changes Incorporated and Module 6	11/30/2019	Completed
Finalized		
Conduct Training on Module 6	12/31/2019	Completed

The project will be completed with in-house resources. To develop and train on the full set of training modules identified in the Northstar recommendations, the project is estimated to take 420 hours at approximately \$118 per hour, for a total estimated cost of \$50,000. The below chart reflects estimated labor hours to develop each module:

Training Module	Estimated Labor Hours
Module 1: Outreach Expectations and Requirements	100 hours
Module 2: Project Scoring	60 hours
Module 3: Documentation Requirements	60 hours
Module 4: Communication with the DPS	20 hours
Module 5: Outreach Budgets	60 hours
Module 6: External Affair Handbook and Procedures	s 120 hours

While no direct cost benefits are associated with this recommendation, formal training of the External Affairs team helps to provide a consistent approach to external outreach activities.

Risk Analysis:

Consistent training ensures that new External Affairs team members will conduct outreach and liaison with elected officials and their staffs in a manner that is consistent with established policies, procedures, and practices. Customers and stakeholders, in turn, will benefit from consistent and timely information about PSEG Long Island activities and initiatives.

Customer Benefit Analysis:

Consistent, robust outreach about PSEG Long Island initiatives and programs provides an opportunity for customers and community stakeholders to provide PSEG Long Island with feedback. Thorough training enables the External Affairs team to conduct outreach in a uniform, well-informed manner.

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Recommendation:

Develop formal public outreach plans for each Tier 3 project (i.e., not a spreadsheet). At a minimum the plans should include the following, and should be updated as the project or anticipated outreach requirements change:

•Description of the project, including timeline and key milestones

•Checkpoints to identify any significant changes in project scope or timing

•Scoring sheets and a discussion of key concerns and how to mitigate them

•Discussion of alternatives considered

•Project budget and detailed outreach budgets

•Anticipated frequency of communications/timeline, planned outreach activities and materials.

Assigned LIPA Staff:	Assigned PSEG Staff:
Sid Nathan, , Michael Deering, Senior Advisor for External Affairs	Christopher Hahn - Executive Sponsor; Joanna Weissman - Team Leader
	~
LIPA Executive:	Ranking:

Objectives and Assumptions of the Recommendation:

A robust public outreach process provides an opportunity for our customers and community stakeholders to learn about planned infrastructure investments in their community, and to provide feedback about any concerns about planned work. The PSEG Long Island External Affairs team has developed and implemented a defined approach for organizing, planning, and executing its outreach activities to align with planned capital investments and potential community response.

This approach is documented in the External Affairs Outreach Handbook. To date, External Affairs District Managers have maintained an abbreviated form to document planned outreach activities. The form currently in use does not document the thorough project evaluation, alternatives review, budgeting process, or detailed communication strategy developed and implemented by the External Affairs team during the course of project outreach.

Development and implementation of a formal, detailed Outreach Plan will allow for greater transparency around planned outreach endeavors, particularly with respect to oversight agencies such as the DPS and LIPA. In 2013, in item 15.4.4, NorthStar recommended that PSEG Long Island develop a comprehensive, coordinated communications, government and public affairs strategy and associated policies and procedures.

In 2018 NorthStar identified improvements made by PSEG Long Island and suggested opportunities for further enhancements. The development of comprehensive outreach plans continues upon the improvements PSEG Long Island has already made in the area of capital project communications.

Deliverable:

A Draft Outreach Planning Template will be developed with in-house resources. The plan will include:

- Description of the project, including timeline and key milestones
- Checkpoints to identify any significant changes in project scope or timing
- Scoring sheets and a discussion of key concerns and how to mitigate them
- Discussion of alternatives considered
- Project budget and detailed outreach budgets
- Anticipated frequency of communications/timeline, planned outreach activities and materials.

The External Affairs team will pilot the Draft Outreach Planning Template for a calendar quarter before finalizing and implementing across the project portfolio.

Deliverables/Milestones	Due Date	Status	Comments
Establish Project Team and Hold	8/30/2018	Completed	
Kick-Off Meeting			
Project Team to Develop Draft	10/15/2018	Completed	
Outreach Planning Template			
including description of project,			
including key milestones;			
checkpoints; scoring sheets; discussion of alternatives			
considered; anticipated frequency of			
communications			
External Affairs team pilots Draft	12/31/2018	Completed	
Outreach Planning Template			
Hold review session to gather	1/31/2019	Completed	
feedback on Draft Outreach			
Planning Template			
Finalize Outreach Planning	2/15/2019	Completed	
Template, incorporating feedback			
from pilot and appending Outreach			
Cost Matrix	0/15/0010	<u> </u>	
Train External Affairs team on	3/15/2019	Completed	
finalized Outreach Planning			
Template			

The project was completed with in-house resources. To develop an Outreach Planning Template, the project cost approximately \$19,000 (160 hours at approximately \$118 per hour). To implement the Outreach Planning Template on an ongoing basis, the project is estimated to take approximately 150 hours per year at a cost of approximately \$118 per hour, for a total estimated annual cost of approximately \$18,000.

While no direct cost benefits are associated with this initiative, implementation of the Outreach Planning Template will result in more consistent documentation of outreach activities across the project portfolio.

Risk Analysis:

Consistent and comprehensive outreach planning and implementation will ensure that customers and key stakeholders receive timely, accurate information about construction activities in their communities before planned work commences, and will provide them with an opportunity to share feedback.

Customer Benefit Analysis:

Consistent, robust outreach about PSEG Long Island initiatives and programs provides an opportunity for customers and community stakeholders to provide PSEG Long Island with feedback. Comprehensive documentation of planned outreach activities will facilitate consistent outreach and will enhance coordination with the DPS and LIPA.

Supply and Wholesale Markets

Recommendation:

Document meetings with impacted officials as required by the External Affairs Handbook.

Assigned LIPA Staff:Assigned PSEG Staff:Sid Nathan, , Michael Deering, Senior Advisor for
External AffairsChristopher Hahn - Executive Sponsor;
Joanna Weissman - Team LeaderLIPA Executive:Ranking:
Low

Objectives and Assumptions of the Recommendation:

PSEG Long Island has assigned External Affairs District Managers to four distinct geographic areas, allowing elected officials and their staff to foster relationships with designated PSEG Long Island representatives. The External Affairs District Managers maintain robust communications with elected officials regarding PSEG Long Island initiatives pertinent to their jurisdictions. Documentation of communications with elected officials and memorializing take-aways from these interactions enhances PSEG Long Island's ability to address any issues arising during the course of ongoing communications

Deliverable:

As of August 2017, the PSEG Long Island External Affairs Director has developed and implemented a weekly tracker for recording meetings, emails, and phone communications with elected officials.

Deliverables/Milestones	Due Date	Status	Comments
Establish documentation log and	8/6/2017	Completed	
train External Affairs team on usage		-	
Implement weekly communication	8/7/2017	Completed	
tracking		<u>.</u>	

Cost Benefit Analysis:

This has already been implemented. Approximate labor is 4 hours per week of internal labor costs at approximately \$118 per hour, for a total annual cost of approximately \$25,000.

No direct cost benefits are associated with this initiative.

Risk Analysis:

Documentation of communications reduces the risk that either party to a communication will fail to recall commitments.

Customer Benefit Analysis:

Documentation of meetings and briefings with elected officials will facilitate consistent followup on external commitments.

Item Status Completed

Assigned PSEG Staff:

Ranking: Low

Christopher Hahn - Executive Sponsor;

Joanna Weissman - Team Leader

Item Status Completed

Recommendation:

Increase the specificity of capital project-related outreach:

• Include more specific, detailed project information on public information meeting letters and notices.

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- All outreach materials (i.e., fact sheets and customer letters) resulting in additional poles, pole changes, a shift from underground to overhead cables should indicate such and provided detailed description.
- Consider increased use of pictures and renderings in outreach materials, particularly the reliability web pages.
- Add a link to PSEG Long Island's reliability web page on all outreach materials, particularly customer letters. Include dates materials were added to the reliability project pages of PSEG Long Island's website.
- Consider an icon for "Upcoming projects in your neighborhood" or the equivalent to the <u>www.psegliny.com</u> landing page.
- Include community/public meeting presentations on the reliability pages of PSEG Long Island's website.

Assigned LIPA Staff:

Sid Nathan, , Michael Deering, Senior Advisor for External Affairs

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Enhancing project-specific details in outreach communications and facilitating access to project information on customer communications and on PSEG Long Island's website will increase customer awareness and understanding of planned system investments. These improvements will expand upon PSEG Long Island's comprehensive, coordinated communications, government and public affairs strategy recommended by NorthStar in 2013 audit item 15.4.4 and identified as an area with opportunities for improvement in 2018. More specific customer notices and enhanced content regarding capital projects will expand PSEG Long Island's regularly, timely communications of issues of significance to customers, as recommended by Northstar in audit item 15.4.5 in 2013 and also identified as an area with opportunities for improvement in 2018.

Deliverable:

In-house resources in the External Affairs and Corporate Communications departments will partner to enhance outreach communications and web site information.

Deliverables/Milestones	Due Date	Status	Comments
Include community/public meeting	11/5/2015	Completed	
presentations on the reliability		· · · · · · · · · · · · · · · · · · ·	
pages of PSEG LI's website			

Increase use of pictures and	8/1/2018	Completed
renderings on reliability web pages		
Include more specific, detailed	8/1/2018	Completed
project information on public		
information meeting letters and		
notices		
Add a "Current Projects"	8/1/2018	Completed
promotional section and		
accompanying link to		
www.psegliny.com homepage		
Develop revised letter and fact sheet	8/7/2018	Completed
templates		
Train SMEs from External Affairs	8/8/2018	Completed
to maintain reliability web pages as		
customer letters are mailed out		
Implement revised letter and fact	8/16/2018	Completed
sheet templates containing		
reliability web page URL		
Add "date posted" to reliability	9/16/2018	Completed
project pages of PSEG Long Island		
web site for future postings		

Implementation costs are anticipated to be minimal. All work will be performed with in-house labor and represents a nominal change from current practices. No direct cost benefits are associated with this initiative.

Risk Analysis:

Clear, accessible and recurring presentation of information about planned capital work will reduce the risk that affected customers will not learn about work in their area before construction commences.

Customer Benefit Analysis:

Enhanced communications and web site content regarding reliability communications will improve customer awareness and understanding of planned reliability improvements.

Recommendation:

Develop and adhere to a schedule for completion of the annual metric identification and target setting process that provides for a final list of approved metrics at the beginning of the measurement year. Tier 1 Metrics, definitions, weightings and targets should be set no later than February 28. There should be a final sign-off on all of the aforementioned elements. Note: This is not intended to imply that the metric book must be completed by February 28; however, it should be done in an expeditious manner.

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Assigned LIPA Staff: Michael Quinn, Senior Manager of Performance Assessment & Contract Admin

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

Margaret Keane - Executive Sponsor; Nicholas Nolau - Team Leader

Ranking:

Moderate

Objectives and Assumptions of the Recommendation:

Define a timeline for mutual agreement of performance metrics, definitions, weightings and targets by Feb 28th of each year, with presentation of those metrics to the LIPA Board at the annual March meeting.

Deliverable:

Final 2019 Performance Metrics letter signed-off by LIPA and PSEG Long Island by no later than February 28, 2019. Sign-off for each subsequent year to occur no later than February 28th.

Deliverables/Milestones	Due Date	Status	Comments
Gather NYS DPS Metric	9/30/2018	Completed	
Suggestions.			^
Conduct and Complete Initial	10/12/2018	Completed	
Internal Discussions (LIPA and			
PSEG Long Island).			
Align Metric Benchmarks and	1/31/2019	Completed	
Target Setting Using Year-End Data			
and Benchmarks.			
Finalization of 2019 Performance	2/15/2019	Completed	Additional time required for
Metrics			technical review of targets for
			Energy Efficiency, Net Write-
			Offs and OMS integration.
			(Completed 3/14/2019)
LIPA and PSEG Long Island	2/28/2019	Completed	Completed on the revised date
Performance Metrics Letter Signed			of 3/15/2019.
Presentation of Performance	3/31/2019	Completed	
Metrics to LIPA Board			

LIPA and PSEG Long Island 2020	2/28/2020 Completed
Performance Metrics Letter Signed	
LIPA and PSEG Long Island 2021	2/28/2021 In Progress
Performance Metrics Letter Signed	
LIPA and PSEG Long Island 2022	2/28/2022 Not Started
Performance Metrics Letter Signed	· · ·

There are no additional direct costs, but successful implementation should drive performance improvements.

Item Status Completed

Recommendation:

LIPA and PSEG Long Island should streamline its process to facilitate the establishment and measurement of meaningful operational metrics to monitor performance, incorporating DPS staff input, and potentially bifurcating the Tier 2 metrics. This might expedite the finalization of the Tier 1 metrics. Examples include:

- Establish a smaller group of Tier 2 metrics used to test metrics for possible inclusion as a Tier 1 metric or to continue to monitor performance when a Tier 1 metric has been moved to a Tier 2 metric.
- Establish a separate classification of metrics to be used to monitor performance in specific areas or for operational reporting. These metrics would not be tied to compensation and could then be used to address such items as the following:
- Changes in regulatory requirements or NYS initiatives (e.g., Reforming the Energy Vision, Clean Energy)
- Elements of LIPA's Strategic Plan, Utility 2.0 or the IRP.
- AMI implementation status
- Issues identified by internal or external audits, including performance deficiencies identified by NorthStar's audit.
- Operational changes or revised priorities.
- Tracking new initiatives or sub-elements of existing initiatives.
- Metrics intended to address efficiency and effectiveness.
- As examples, a number of the Tier 2 metrics used over time would more appropriately have been part of this category: social media followers, staffing levels permanent, percent of financial management reports delivered to LIPA.

Assigned LIPA Staff:	Assigned PSEG Staff:
Michael Quinn, Senior Manager of Performance	Margaret Keane - Executive Sponsor;
Assessment & Contract Admin	Nicholas Nolau - Team Leader
LIPA Executive:	Ranking:

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Objectives and Assumptions of the Recommendation:

Streamline the metric setting process to facilitate the establishment and measurement of meaningful operational metrics to monitor performance, incorporating DPS staff input. This will be captured in the Contract Administration Manual, specifically CAM-BPE-F1 "Performance Metric Definition and Adjustment Process".

Moderate

Deliverable:

Complete update of Contract Administration Manual CAM-BPE-F1 "Performance Metric Definition and Adjustment Process"

Deliverables/Milestones	Due Date	Status	Comments
Form LIPA and PSEG Long Island	10/30/2018	Completed	
working group to review CAM-		-	
BPE-F1 "Performance Metrics			
Definition and Adjustment Process"			
Complete Initial Mark-Up of CAM-	12/14/2018	Completed	
BPE-F1			
Completion and Sign-Off to	2/28/2019	Completed	Final draft executed following
Updated CAM-BPE-F1			revised date. CAM-BPE-F1
"Performance Metric Definition and			signed-off by Rick Shansky and
Adjustment Process"			Peggy Keane on 9/25/2019.

There are no additional direct costs, but successful implementation should drive performance improvements.

Recommendation:

LIPA and PSEG Long Island should continue to evaluate how to best incentivize service provider performance (Tier 1 metrics), drive continuous improvement and align the metrics with the focus of LIPA and PSEG Long Island's long-term strategy/operational needs and industry best practices.

Assigned LIPA Staff:

Michael Quinn, Senior Manager of Performance Assessment & Contract Admin

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

Margaret Keane - Executive Sponsor; Nicholas Nolau - Team Leader

Ranking:

Moderate

Objectives and Assumptions of the Recommendation:

The primary objective is to incentivize the service provider to become a first quartile performer across all metric categories of customer satisfaction, technical and regulatory and financial, while focusing on operational and strategic needs and understanding, aligning and targeting performance that is consistent with industry best practices.

Deliverable:

Alignment of performance metrics with long-term strategy/operational needs and industry best practices will continue and be accomplished with the completion of the 2019 performance metrics and targets process. However, this is an ever changing and ongoing effort that will continue to be addressed each year via the annual metrics negotiation process. Furthermore, and where applicable, the Authority will rely on and utilize audits and assessments conducted by LIPA, PSEG Long Island and outside parties to identify specific areas of weakness or opportunity that can be addressed via the creation of new metric(s) and associated target(s).

Deliverables/Milestones	Due Date	Status	Comments
Gather Metrics Suggestions From	8/31/2018	Completed	
DPS			
Identify Potential Performance	8/31/2018	Completed	
Metrics Resulting From LIPA's			
Enterprise Risk Management			
(ERM) Review Process			
Identify Potential Performance	9/28/2018	Completed	
Metrics Stemming From LIPA's			
Internal Audits			
Identify Potential Performance	10/31/2018	Completed	
Metrics from J.D. Power Annual			
Assessment and Oversample Data			

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No significant incremental costs are anticipated beyond the typical budget for third party consultant and audit services. The benefit will be realized through various performance improvements, however, specific costs and benefits cannot be ascertained at this time.

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Item Status Completed

Recommendation:

Define the metric calculation methodology to specify whether service restorations completed in exactly two hours should be included in the ETR Accuracy performance metric. NorthStar found the specified calculation methodology open to some interpretation. Currently, PSEG Long Island does not include restoration times of exactly two hours. This should be reconciled between PSEG Long Island and LIPA.

Assigned LIPA Staff:

Michael Quinn, Senior Manager of Performance Assessment & Contract Admin

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

Margaret Keane - Executive Sponsor; Nicholas Nolau - Team Leader

Ranking:

Low

Objectives and Assumptions of the Recommendation:

The recommendation is to clarify the calculation methodology and metric definition for ETR accuracy performance metric and how a restoration time of exactly two hours is calculated.

Deliverable:

LIPA and PSEG Long Island agreed to alter the metric definition and metric calculation for the ETR accuracy metrics to clarify what is considered achieving the targeted results.

The current definition states:

Estimated Time of Restoration (ETR) Accuracy is the ability to provide ETR estimates (including Initial ETR (ITR) and up to 2 ETR changes (ETR 1 and ETR 2)) that are achieved at or in advance of the predicted restoration time (ITR) or within two hours or less of the final projected ETR for a customer (ETR 1 and ETR 2). Excludes any data that meets PSC exclusion criteria.

The current calculation is:

[Number of outages restored within ETR tolerance]/[Total number of ETRs provided for ITR, ETR 1 and ETR 2]. Tolerance is defined as no greater than ITR or no more than 120 minutes prior to ETR 1 and ETR 2. More than 2 ETR changes (i.e., ETR 3) is defined as a "FAIL".

The new agreed upon definitions and calculations for the metrics are stated below and will be reflected in the July 2018 scorecard.

New definition states:

Estimated Time of Restoration (ETR) Accuracy is the ability to provide ETR estimates

(including Initial ETR (ITR) and up to 2 ETR changes (ETR 1 and ETR 2)) that are achieved at or in advance of the predicted restoration time (ITR) or within two hours or less of the final projected ETR for a customer (ETR 1 and ETR 2). Excludes any data that meets PSC exclusion criteria. Any restoration that is exactly two hours is considered achievement of the metric and will not be counted as a "FAILED" ETR.

New calculation is:

[Number of outages restored within ETR tolerance]/[Total number of ETRs provided for ITR, ETR 1 and ETR 2]. Tolerance is defined as no greater than ITR or no more than 120 minutes prior to ETR 1 and ETR 2. More than 2 ETR changes (i.e., ETR 3) is defined as a "FAIL". Any restoration that is exactly two hours is considered achievement of the metric and will not be counted as a "FAILED" ETR.

Deliverables/Milestones	Due Date	Status	Comments
Calculation in the August 2018	9/1/2018	Completed	
scorecard package to clarify the			
metric definition and calculation			

Cost Benefit Analysis:

Not applicable

Risk Analysis: Not applicable

Customer Benefit Analysis: Not applicable

Item Status Completed

Recommendation: Memorialize the process regarding PSEG Long Island conflict of interest in regional market

activities (discussed in Section 4.18 of the A&R OSA) in the Contract Administration Manual (CAM).

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Assigned LIPA Staff:

David C. Clarke, Director of Wholesale Market Policy

LIPA Executive:

Rick Shansky, Senior Vice President of Power Supply and Wholesale Markets

Assigned PSEG Staff:

Paul Napoli - Executive Sponsor ; Peter Andolena - Team Leader

Ranking:

Low

Objectives and Assumptions of the Recommendation:

PSEG Long Island, under the Amended & Restated OSA with LIPA is required to provide Regulatory Support, Reporting and Policy Recommendations for all Regulatory Markets that LIPA is active in. This essentially requires representation on over 40 Committees in PJM, NYISO, and ISO-NE as well as coverage of certain PSC/DPS, FERC and NERC related matters. PSEG Long Island utilizes subject matter experts, attorneys and consultants, who attend and/or provide support for these meetings/matters and regularly report back via weekly policy and committee conference calls that occur with LIPA.

Section 4.18 of the Amended & Restated OSA is a "Conflicts of Interest" provision that allows PSEG Long Island to modify its role from that of "policy advocate" to "policy adviser" for LIPA if it is determined that a regulatory policy position that would favor LIPA is in potential conflict with a position taken by another PSEG Affiliate. In the reduced role of policy adviser, PSEG Long Island will still provide administrative and technical support to LIPA on these issues as required. In this role, however, PSEG Long Island removes itself from all voting matters and public advocacy, deferring to LIPA. All correspondence regarding these issues will be solely signed and submitted by LIPA.

Deliverable:

PSEG Long Island Power Markets will memorialize the process, working with members from its Process Documentation and Legal Departments, will develop a formal procedure that will be incorporated into its CAM to identify and address potential Conflicts of Business Interests as defined in this document and in the Amended & Restated OSA.

Deliverables/Milestones	Due Date	Status	Comments
Identify key PSEG Long Island	6/29/2018	Completed	
personnel and departments needed			
to address the issue.			
Hold a "Kickoff Meeting" to	7/10/2018	Completed	
identify key deliverables and		·	
milestones.			

Develop First Draft of CAM	7/20/2018	Completed	
Procedure. (Flowcharts,			
descriptions, etc.)			
PSEG Long Island Review and	7/30/2018	Completed	
Comment Period (Route - internal		· · ·	
review)			
Final PSEG Long Island Draft	8/6/2018	Completed	
Document (For submission to LIPA)			
Finalize LIPA and PSEG Long	11/30/2018	Completed	
Island Reviews and incorporate into	^		
the CAM.			

This is a documentation process which memorializes current procedures to resolve potential conflicts of business interests as defined in the Amended and Restated OSA in the CAM.

There are nominal incremental costs to document a procedure to address PSEG Long Island conflict of interest in regional market activities.