



PSEG Long Island 2022 Emergency Restoration Plan

July 27, 2022

PSEG LONG ISLAND EMERGENCY RESTORATION PLAN

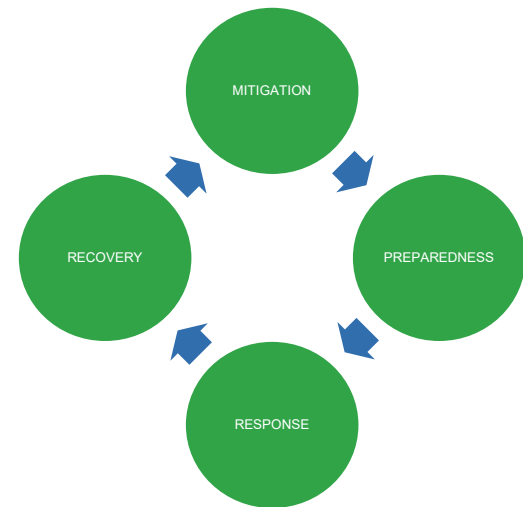
Plan Updates

- Emergency Restoration Plan (ERP) required by Public Service Law NYCRR §105
- The revised plan is filed annually with the Department of Public Service (DPS) in mid-December
- Comprehensive document delineating strategic emergency response across all functions of the organization (Communications, Operations, Logistics, Planning, Finance)
- PSEG Long Island personnel are trained and drilled annually on plan components
- ERP should be simple, flexible, scalable, and easily adaptable to specific emergency events
- Uses Incident Command System (ICS) for coordinated preparation and response

PSEG LONG ISLAND EMERGENCY RESTORATION PLAN

Annual Update and Approval Process

- Emphasis on enhancing overall storm restoration processes and communications before, during, and after storm events
- Integrates lessons learned from after action reviews, seek opportunity to improve
 - Input solicited throughout the year from key stakeholders and process owners
 - On-going measurement of key performance statistics to identify improvement opportunities
- Updates are incorporated and reviewed by:
 - Storm Process Owners
 - PSEG Long Island Senior Leadership
 - LIPA staff
 - DPS staff



PSEG LONG ISLAND 2022 ERP SUBMISSION TIMETABLE

- PSEG Long Island's 2022 ERP was filed with DPS on December 15, 2021
 - *Note: LIPA was not provided adequate time to review and comment prior to submission to the DPS.*
- DPS staff provided mid-year comments on April 12, 2022
 - PSEGLI emergency preparedness staff, LIPA, and DPS met virtually to review DPS comments on May 2, 2022
 - Revised ERP was submitted to DPS and LIPA on May 26, 2022
- The final ERP filed with DPS on May 31, 2022
- Certification Letter filed with NYS Division of Homeland Security and Emergency Services (DHSES) Commissioner on June 1, 2022 as per PAL 1020-f(cc)(3)

NOTEWORTHY CHANGES TO 2022 ERP

- **Added language detailing PSEG LI development of annual ERP and ICS (Incident Command System) on-line training for all employees (Chapter 1)**
- **ETR Procedure (Chapter 8)**
 - Updated section to include new three-hour ITR for Branch line outages in-line with ETR Accuracy Metric
 - Updated ETR Protocol section to align with DPS updated ETR Protocol
- **Joint NYS Utility/DPS Collaborative Items:**
- **Updated Semi Annual Stress Testing language (Chapter 10)**
 - Change now allows for more time to submit test reports – 20 days for Stress Test report; 30 Days for failed stress test remediation report and 90 days to complete retest.
- **Updated Language on Coordination Meetings with State, County and NYC OEM representatives (Chapter 13)**
 - Clarifies the requirement for the bi-annual meetings which now allows first meeting to be held In-person/Virtual and second midyear check-in to review Critical Facilities list and Personnel Contacts to be reviewed via email/telephone.
- **Continued Life Support Equipment (LSE) Process Enhancements (Chapter 14)**
 - Clarified minimum LSE Contact Requirements using Uniform language from Joint NYS Utility/DPS Collaborative including definition of an LSE “contact” (phone vs. in-person) for consistency across all NYS utilities.
 - Added third-party vendor utilization to LSE operations to assist on Wellness checks.

2023 EMERGENCY RESTORATION PLAN

The 2nd A&R OSA now requires LIPA's review and approval prior to submitting 2023 ERP to DPS following the timeline below:

August 15, 2022 - PSEGLI Submission to LIPA

October 15, 2022 - LIPA Review and Comments to PSEGLI

October 31, 2022 – PSEGLI / LIPA discussion and agreement on changes

November 15, 2022 – PSEGLI submits to LIPA the final draft for approval and signature

December 1, 2022 – LIPA submits signed approval of 2023 ERP

December 15, 2022 – PSEGLI files with DPS the LIPA Approved ERP



125 East Bethpage Road, Plainview, NY 11803
www.dps.ny.gov/longisland

July 22, 2022

Via Email and U.S. Mail

Honorable Mark Fischl, Vice Chairman
Board of Trustees
Long Island Power Authority
333 Earle Ovington Blvd.
Uniondale, New York 11553
boardoftrustees@lipower.org

Re: Matter No. 21-02415: DPS Recommendations Regarding PSEG Long Island's
2022 Emergency Response Plan.

Dear Vice Chairman Fischl:

In accordance with the LIPA Reform Act (LRA), the New York State Department of Public Service (DPS or the Department) reviews and makes recommendations regarding the Emergency Response Plan (Plan or ERP) of the Long Island Power Authority (LIPA or Authority) and PSEG Long Island (PSEG LI or Service Provider). Accordingly, DPS recommends adoption of the amended ERP filed on May 31, 2022.

The LRA contains numerous provisions intended to improve the transmission and distribution of electric service and the restoration of service after emergency events for customers on Long Island and the Rockaways. To that end, the LRA requires that DPS annually review the ERP of the Authority and its Service Provider to determine the Plan's consistency with applicable requirements of the Public Service Law (PSL), Public Service Commission (PSC or Commission) regulations, and PSC orders, and recommend modifications as necessary.¹

On December 15, 2021, consistent with the requirements of the LRA, PSEG LI filed its ERP.² Following the December filing, DPS Staff (Staff) reviewed the ERP to ensure that it conformed with the requirements set forth in PSL §66(21) and 16 NYCRR. Part 105. As part of the review, Staff recommended modifications, as appropriate, and worked collaboratively with PSEG LI to implement the modifications to strengthen its ERP. PSEG LI addressed Staff's concerns in its amended ERP filed on May 31, 2022, therefore, DPS recommends the amended ERP be adopted.³

¹ Public Service Law §3-b(3)(c).

² Matter 21-02415, PSEG LI - ERP, PSEG LI Emergency Response Plan (filed December 15, 2021).

³ Matter 21-02415, supra, PSEG LI Emergency Response Plan (filed May 31, 2022) (PSEG LI ERP).

PSEG LI's ERP is consistent with the applicable areas of law and the regulations and PSC Orders promulgated thereto. Generally, the Department's review of the ERPs focuses on incorporating best practices, clarifying roles and responsibilities, improving the crew mobilization and demobilization processes, and resource tracking.

Additionally, while reviewing the initial ERP filing, Staff recommended numerous specific changes or updates to be included in PSEG LI's ERP, which relate to customer communications, information technology, outreach to government representatives, and support for Life Support Equipment (LSE) Customers. The specific changes are discussed below.

Press Releases

Customers rely on their utility company to provide them with crucial information during an emergency event. This information is even more important to customers who are experiencing an outage. One of the key tools that utility companies can use to widely disseminate information during an emergency event is a press release. A detailed press release that has been disseminated through multiple communication mediums can increase the exposure that this critical information gets. Further, increasing the exposure of this information makes it more likely that customers will receive the information that they need during an emergency event.

In its recent Order, the Commission noted that the strength of a utility company's message strategy depended on coordination between their operational and communications department.⁴ Further, the Order also referenced the fact that certain IOUs updated their press release templates to include "more targeted language that illustrates the coordination between operations and communications in message crafting that will lead to the inclusion of more detailed and localized content into press releases."⁵

A press release can contain several types of information, which are vitally important to customers during a storm event. Examples of important storm related information that PSEG LI lists in its ERP for incorporation into its press releases include: 1) storm information; 2) the service areas impacted; 3) instructions for reporting an outage; 4) estimated restoration time; 5) dry ice or bottled water locations; and 6) shelter locations.⁶ While this type of detailed information can help ensure the safety of PSEG LI's electric customers, it is also possible for the Company to tailor these communication methods to specific customers.

Detailed information contained in a press release, which is tailored to specific parts of the utility's service territory can be incredibly useful, especially when the company utilizes multiple communication methods to distribute the information. This practice maximizes the size of the target audience. In response to discussions with Staff, PSEG LI revised its ERP to ensure that its departments within PSEG LI work together to draft press releases, which provide information

⁴ Case 21-E-0567, In the Matter of December 15, 2021, Electric Emergency Response Plan Review (2022 Plan), Order Approving Certain Utilities' Amended Electric Emergency Response Plans (issued May 12, 2022) p. 7. (PSC 2022 Order).

⁵ Id.

⁶ PSEG LI ERP, pp. 61-62.

that is specifically tailored to the current situation, and the needs of its customers.⁷ PSEG LI's ERP contains provisions that align their press releases to the news cycle, which ensures that its customers are more likely to access this information.⁸ In addition, PSEG LI ensures that municipal officials receive tailored information.⁹ While the level of detail contained in a press release and the scope of its dissemination are important components of PSEG LI's communication strategy, its usefulness is diminished if customers do not receive this information when they need it.

The timeliness of information is critical, and even comprehensive information is not useful if it is outdated. To ensure that the information it releases is useful, PSEG LI must provide its customers, and public officials, with detailed and tailored information in a timely fashion. PSEG LI's now amended ERP provides a timeline for the release of press releases during an emergency event, which ensures that customers and government officials receive the information they need, at the time they need it. For outages expected to last less than or equal to 48 hours, PSEG LI's ERP specifies that it will issue a press release within the first 12 hours of the restoration period with information about the estimated time of restoration.¹⁰ Also, within the first 24 hours of the restoration period, PSEG LI will consider issuing a press release for the next news cycle.¹¹

For outages expected to last more than 48 hours PSEG LI's ERP requires a more comprehensive communication strategy.¹² Initially, PSEG LI will issue a press release prior to the weather event. Then, PSEG LI's ERP states that it will issue a press release within the first six hours of the restoration period, which indicates the likelihood of extended outages. Finally, PSEG LI will issue a press release within the first 12 hours of the restoration period based on the predetermined time periods contained in its emergency plan.

These enhancements to PSEG LI's ERP will provide its customers, and government officials with more detailed and targeted information during emergency events.

Website Accuracy

Another key communication tool is PSEG LI's website, which it uses to disseminate important information during an emergency event and is updated regularly. The utility company website provides customers with the most comprehensive source of information regarding their electric service. During an emergency event it's critical that the Utility update its website to provide customers with the latest information pertaining to service outages and restoration efforts. The Commission Order stated that requiring the IOUs to update the timestamps on their websites on a regular basis "reaffirms the validity of the information" to the public.¹³ To ensure

⁷ PSEG LI ERP, p. 201.

⁸ PSEG LI ERP, p. 116.

⁹ Id., pp. 162-163.

¹⁰ Id., p. 116.

¹¹ Id.

¹² Id., p. 117.

¹³ PSC 2022 Order, p. 8.

its customers receive timely and accurate information, PSEG LI's ERP states that it will require that its communication applications are time stamped "no less than" every eight hours.¹⁴

During an emergency event, utility customer's health and safety may depend on the accuracy and timeliness of the information on the utility company website. An updated time stamp provides customers with verification that the information on the company's website is accurate, and up to date. Also, this verification can help limit the number of questions that customers direct to local government officials, as well as the utility company itself. Examples of critical information that may be listed on the utility company website include the estimated time of restoration, shelter locations, and hours of operation. As a result, it is vitally important to ensure that the utility website is updated regularly.

Due to the importance surrounding website accuracy, Staff engaged in discussions with the Joint Utilities and PSEG LI to ensure that its ERP reflected the need to provide timely and accurate information to its customers during an electric emergency. Based on these discussions PSEG LI will continue to update the timestamps on its event related event-related website every 8 hours. Further, PSEG LI's ERP states that it will time stamp its communication applications approximately every eight hours when there are no updates.¹⁵ These provisions will ensure that PSEG LI's customers have ready access to important and up-to-date information during an electric emergency.

Semi-Annual Meetings with County Representatives

An important component of emergency planning is regular meetings between utility company personnel, county emergency management personnel, police, and fire officials. These meetings provide the participants with the opportunity to review and discuss emergency coordination, response planning, delineate responsibilities during an emergency, exchange updated contact information and review critical facility information. As a matter of fact, our current technological capabilities enable more frequent and direct communication between these parties.

Frequent and collaborative communication is critical when coordinating efforts to prepare for emergency response efforts to eliminate hazards to the public. Further, in-person, or virtual meetings can ensure that the appropriate emergency response and utility company staff engage in clear and direct discussions regarding their individual roles, and shared responsibility. To that effect, PSEG LI provides municipalities with several helpful communication channels, such as virtual communications and municipal dashboards where municipal officials can go online to report hazardous conditions, outages, blocked roads, and to track outages in their areas. As a result, PSEG LI and County representatives are able to communicate efficiently and effectively either in-person or via virtual communication channels.

PSEG LI's ERP calls for semi-annual meetings with representatives from all levels of government. PSEG LI states that it will meet with state, county, and local government officials

¹⁴ PSEG LI ERP, p. 199.

¹⁵ PSEG LI ERP, p. 199.

“in person or through virtual platform (not a conference call).”¹⁶ These meetings will be used to discuss planning and procedures related to restoration, critical facility identification, contact information, critical roads, and dry ice distribution locations. Further, PSEG LI will offer these officials a second meeting, which will be provided either in-person or through a virtual platform.¹⁷ Finally, if the government officials decline the second meeting, PSEG LI will provide the Emergency Operations Center with a contact person to discuss issues pertaining to critical facilities, or answer any questions.

Staff and PSEG LI representatives worked together to revise the ERP so that it would provide a similar level of flexibility as the changes accepted by the Commission in its recent ERP Order. In that Order, the Commission noted that some County representatives believed that “requiring two in-person meetings every year... takes an inordinate amount of time.”¹⁸ PSEG LI’s revised ERP, now offers the option of in-person and virtual meetings, which provides greater flexibility to the utility and government representatives who need to attend them, while ensuring that this critical planning and communication process takes place. PSEG LI’s ERP demonstrates that it is committed to a constructive dialogue with its government and emergency management counterparts. These additional enhancements to PSEG LI’s ERP foster stronger and more collaborative efforts between PSEG LI and its municipal counterparts.

Communication with Governmental and Municipal Officials

During an emergency event, utility companies are an important source of information for State, local and municipal officials. Municipal and government officials rely on the utility companies to conduct update calls that provide them with critical information related to the emergency event, which they can relay to their constituents. These calls are important because constituents rely on their government officials as a trusted source of information during emergencies. Moreover, utility companies conduct numerous calls during electrical emergencies, and it is important to have an accurate record of these calls that parties can use as a reference. In certain instances, transcripts have been made of these calls, but they have often failed to capture all the information discussed in the calls.¹⁹ To bridge this gap, the Commission addressed this issue in its recent Order.

In its Order, the Commission discussed the importance of regular update calls between utility companies and government officials during an outage event. Further, the Order noted that elected officials rely on these calls to keep updated and relay important information back to their constituents.²⁰ However, the current methodology for documenting the content of these discussions limits the ability of utility staff to engage in proper follow up activities to address the concerns raised by government officials.²¹ Due to these concerns, it was important for the parties to find a solution.

¹⁶ Id., p. 152.

¹⁷ Id.

¹⁸ PSC 2022 Order, p. 9.

¹⁹ Id., p. 10.

²⁰ Id.

²¹ Id., p. 11.

Staff held discussions with the IOUs and PSEG LI about this issue. Based on these discussions, the parties determined that a new method was needed to adequately document the content that was discussed during the calls between utility company representatives and government officials. For this reason, PSEG LI's ERP has been updated to include language which specifies that it will record all calls with municipal officials pertaining to emergency events.²² This update aligns PSEG LI with the IOUs who also updated their ERPs to indicate that they will record these municipal calls.²³ These recordings will ensure that the relevant parties have an accurate reference tool which they can utilize to ensure that they are conveying the correct information to their constituents.

Further, PSEG LI has updated its ERP to ensure that government and municipal officials receive important information during and after an emergency event. PSEG LI's ERP contains new language which states that it will ensure "that municipal leaders and elected officials have relevant recovery information to educate their constituents and respond to their inquiries."²⁴ These changes to PSEG LI's ERP will improve communication between the company and its State, local and municipal counterparts, which will enable these government officials to better serve the needs of their constituents.

Life Support Equipment Customers

Utility companies are required to contact customers on Life Support Equipment (LSE) daily during a storm event. LSE customers are defined in 16 NYCRR §105.4(b)(9) as those customers who require electrically operated equipment to sustain basic life functions. Additionally, LSE customer accounts have a special code, and their meters have a special seal to prevent disconnection. While LSE customers are required to certify annually, they will not lose their certification status if they do not recertify. To ensure the safety of LSE customers during large scale storm or electric emergencies, 16 NYCRR Part 105 contains extensive outreach requirements that the IOUs must follow, and PSEG LI has also incorporated these requirements into its ERP.

Due to their vulnerable status, PSEG LI is required to contact, via a personal phone call, at least 80% of their LSE customers that are impacted by outages within 12 hours of the start of the event. Then, PSEG LI is required to make a second contact attempt within 12 hours if they were unable to reach the LSE customer during the first attempt. Further, PSEG LI is required to contact or refer to an emergency center 100% of its affected LSE customers within 24 hours each day.²⁵ Finally, PSEG LI must ensure that within 24 hours of the start of the event, LSE customers who have lost power must have been either: 1) contacted by a utility representative; 2) visited by a utility representative; 3) referred to emergency services; or 4) restored within that time period.²⁶

²² PSEG LI ERP, p. 155.

²³ PSC 2022 Order, p. 11.

²⁴ PSEG LI ERP, p. 155.

²⁵ PSEG LI ERP, p. 168.

²⁶ Id.

During non-storm conditions, PSEG LI is required to contact its LSE customers on a semi-annual basis to inform them about: 1) the potential for power outages that could impact the life-saving equipment that they rely on; 2) the importance of planning and preparation to deal with potential storms; 3) LSE enrollment and annual recertification; and 4) the need for accurate contact information. Additionally, PSEG LI customer service representatives will remind LSE customers that their designation as an LSE customer does not afford them restoration priority.²⁷

Although LSE customers do not receive restoration priority, they are afforded certain protections when affected by power outages due to their medical vulnerability. PSEG LI will prioritize an outage with an LSE customer over an outage without an LSE customer. Also, PSEG LI has outreach plans to ensure that these customers are contacted “before, during, and after a large-scale storm or electric system emergency when extended outages are expected to last more than 48 hours.”²⁸

After discussions with Staff, PSEG LI updated its ERP to incorporate a common definition of “contact” to align it with the changes to LSE outreach that were approved in the Commission’s Order.²⁹ The new definition of contact, in reference to LSE customers, includes a personal phone call in which the LSE customer or guardian/representative/person in residence is directly spoken to, a field visit by a utility representative or third-party in which a person in residence is directly spoken to, or an automated phone call or text message with the necessary interactive features.³⁰ Additional changes include providing LSE customers with the opportunity to opt-out from additional contact attempts for a storm or electric emergency event.³¹ These changes provide PSEG LI with greater flexibility to initiate contact with LSE customers, and they also enable LSE customer to take charge of the outreach efforts conducted by the utility company. Moreover, the Commission stated that “some LSE customers feel the frequency of contacts during restoration is excessive.”³² Accordingly, if an LSE customer believes that they do not require further outreach from the utility company, then they can choose to opt out of future outreach.

These changes to PSEG LI’s ERP provide more flexibility to PSEG LI and LSE customers while ensuring that sufficient outreach protocols remain in place to ensure the well-being of this vulnerable population.

Semi-Annual Stress Testing

PSEG LI and Staff held discussions concerning updates to the section of its ERP which pertains to semi-annual stress testing of the Company’s Outage Management System (OMS). Among the changes to this section, PSEG LI is required to submit a report, within 20 business days of the stress test, to the DPS Director of the Office of Resilience and Emergency Preparedness (OREP), which details the results of the stress test. Also, PSEG LI stipulated that

²⁷ Id., p. 167.

²⁸ Id.

²⁹ PSC 2022 Order, p. 12.

³⁰ PSEG LI ERP, p. 170.

³¹ Id., p. 171.

³² PSC 2022 Order, p. 12.

it would develop and provide a remediation plan to the DPS Director of OREP within 30 calendar days of a failed stress test. Further, PSEG LI clarified the language in this section to require a retest within 90 calendar days of a failed stress test. Finally, PSEG LI is required to notify the DPS Director of OREP if they are unable to complete the retest within 90 days.³³

Stress tests are an important component of a utility company's ERP because they require the company to assess its OMS under high pressure emergency conditions. In particular, utility company personnel are able to use the test conditions to identify any weaknesses within their system. Upon identification of any deficiencies, the utility company can take corrective action to address the problem. As a result of this testing process, PSEG LI should be better prepared to handle a real-world emergency event.

On-Going Processes and Collaborative Meetings:

Collaborative discussions between Staff and PSEG LI have led to significant progress during this annual review of PSEG LI's ERP, however, more work remains to be done. These discussions have ensured that PSEG LI's ERP is aligned with the requirements that the Commission has applied to the IOUs ERPs. To continue this progress and ensure that PSEG LI's ERP can meet future challenges, Staff and PSEG LI need to continue this collaborative dialogue. The Commission stated that additional discussions between the utilities and Staff are needed to create "a common event classification matrix that would apply to all of the Utilities and PSEG LI."³⁴ In addition, the Commission stated that parties should work to ensure that the integration of automated meters with outage management systems provide the utilities with better outage models, improved restoration efforts, and better communication with customers.³⁵

Thus, there is a need for the Department to continue to engage with PSEG LI to enhance the effectiveness of its ERP and to determine whether there are other ways to measure the efficacy of the Company's storm response and restoration efforts. The Commission also raised concerns about call center staffing levels during outage events, noting that the parties should continue to review how they are staffed during outage events. Further, the Commission stated that Staff and the utilities should discuss how abandoned call rates may be used to evaluate performance.³⁶

While PSEG LI's and the other New York State IOUs' ERPs reflect improvement, the topics discussed here should be explored through further collaborative discussions with Staff, the New York State IOUs, PSEG LI, and other stakeholders. The Department strongly recommends that PSEG LI meaningfully participate in any future collaborative meetings commensurate with the IOUs.

Conclusion:

³³ PSEG LI ERP, p. 136.

³⁴ PSC 2022 Order, p. 13.

³⁵ Id.

³⁶ Id.

After several rounds of discussion between Staff and PSEG LI, the final ERP represents an improvement over the initial version that was filed on December 15th. Although the process delineated within PSEG LI's ERP has been improved, the Company must still adhere to the preparation, communication, and restoration requirements contained within the ERP. As long as PSEG LI follows the requirements contained in its ERP, customers and government representatives can expect better communication from the Service Provider. Further, PSEG LI will be better prepared to face severe storms and any related outage events.

Both the Department and the people of Long Island look to PSEG LI to make constant improvements to the quality and level of its service. One way to ensure that PSEG LI meets this goal is for the parties to continue to have collaborative discussion about the requirements contained in the company's ERP. While the current changes to PSEG LI's ERP will improve the company's ability to meet its customers' needs during major outage events, the increasing number of major storm events require continuous modification and improvement to the ERP.

Overall, PSEG LI's ERP remains consistent with the applicable areas of law and the regulations and Commission orders promulgated thereto. The amended ERP has been enhanced to address specific issues and reflect best practices and incorporates the corrective actions identified in the Commissioner Order, and should, therefore, be adopted.

Respectfully submitted,



Rory M. Christian
Chief Executive Officer

CC: Thomas Falcone, LIPA Chief Executive Officer
Bobbi O'Connor, LIPA General Counsel and Secretary to the Board of Trustees
Dave Lyons, PSEG LI President and Chief Operating Officer
Carrie Meek Gallagher, DPS LIO Director
Kevin Wisely, DPS OREP Director
Nicholas Forst, DPS LIO Counsel
Peter Hilerio, DPS LIO Counsel