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MHPUC 19NOV 15am 11:39

November 17, 2015

Via Electronic Mail and US Mail

Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301-2429

Re: IR 15-047; After-Action Report of November 26, 2014 Thanksgiving Snowstorm – New Hampshire's Regulated Utilities' Preparation and Response

Dear Ms. Howland:

On September 29, 2015, the Commission Staff filed its After-Action Report for the November 26, 2014, Thanksgiving snowstorm. The Commission's October 20, 2015, secretarial letter provided the utilities with the opportunity to comment on the Staff's report, with such comments due on or before November 29, 2015.

In its report, Staff noted on page 2, "This report does not focus on Liberty Utilities other than including data for total outages because this storm did not have significant effect on their service territory." Although much of the report focuses on the other New Hampshire utilities, Liberty Utilities ("Liberty") is providing comments on three items noted in the report.

Staff's General Findings Page 6

Staff recommended that the Commission form a committee to assist in developing a request for proposal (RFP) to provide an economic impact of wide scale storm events. Liberty is willing to participate in any committee formed by the Commission to develop such an RFP.

Staff Recommended Corrective Actions Regarding Utility Communications Page 20

1. To the extent this is not already being done, utilities shall provide their customer representatives with customer specific ETR information. Websites should provide real-time mapping that shows outage locations with numbers of customers affected at each location, as well as ETRs for each location.

At this time, Liberty performs a Phase 1 survey of damage as referenced in our Emergency Response Plan. Once this survey is complete, the Company's outage system is updated with information, which is then loaded into the outage map. When a crew is assessing the area, the map is updated to reflect that an assessment is in progress. When a crew has been assigned to the area, the map is updated with a note that a crew has been assigned. After the area has been assessed, a crew has

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been assigned, and the restoration time has been quantified, the outage management system is updated with an estimated time of restoration (ETR). Customer service representatives have full access to the outage map and are able to look at each area on the map in real-time to determine if an assessment has been completed, whether a crew is assigned, and if an ETR is available.

Appendix C – Status Report on the October 2011 Snowstorm After-Action Review Page 81

6. Given the competition for limited resources within the region, New Hampshire electric utilities shall explore mechanisms for pooling aggregate resource needs, especially field and line crews. Cost sharing mechanisms regarding resource attainment and allocation are to be explored and developed resulting in a report jointly filed by the four electric utilities describing the feasibility of such an arrangement, filed with the Commission by June 30, 2013.

Under the "Comments" section, it is noted that the "PUC Staff created an internal memo on October 2, 2013, showing the deficiencies regarding the NAMAG process." Liberty is requesting a copy of this internal memo from Commission Staff.

Thank you for your assistance with this matter. Please do not hesitate to contact me should you have any questions.

Sincerely,

Stephen R. Hall

Stephen R. Hall

cc: Service List