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April 7, 2010

**VIA OVERNIGHT MAIL**

Mr. James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, Pennsylvania 17120

Re: Proposed Policy Statement Regarding Utility  
Service Outage Public Notification Guidelines  
Docket No. M-2008-2065532

Dear Secretary McNulty:

Enclosed for filing are an original and fifteen (15) copies of Duquesne Light Company's  
Comments in the above-referenced proceeding.

Sincerely yours,

Vernon Edwards  
Regulatory Compliance Supervisor

Enclosures

cc via E-mail:  
Elizabeth Barnes

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Proposed Policy Statement Regarding  
Utility Service Outage Public Notification  
Guidelines

Docket No. M-2008-2065532

**COMMENTS OF  
DUQUESNE LIGHT COMPANY**

At its Public Meeting of April 30, 2008, the Commission adopted the Commission's Bureau of Conservation, Economics and Energy Planning and Office of Communication's investigative report<sup>1</sup> which summarized the findings of the investigation and recommended revisions to existing regulations and the adoption of a new policy statement. On that same date, the Commission adopted a Joint Motion of Vice Chairperson Tyrone J. Christy and Commissioner Kim Pizzingrilli to initiate a rulemaking proceeding to revise existing regulations on Service Outages and reportable incidents, as well as directing that a Policy Statement be issued.

Duquesne Light Company appreciates the opportunity and hereby submits these comments in response to the Pennsylvania Public Utility Commission's ("Commission's") Proposed Policy Statement Order adopted November 6, 2009 and published in the Pennsylvania Bulletin on March 6, 2010, at Docket No. M-2008-2065532. Subsequently, the Energy Association of Pennsylvania sought and received a two-day extension of time until April 7, 2010 for itself and member companies to file

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<sup>1</sup> Adopted at Docket Number M-2008-2065532

comments in the instant proceeding. Duquesne's comments on the specific sections of the Proposed Policy Statement, are set forth below.

### Introduction

The purpose of the Proposed Policy Statement is to help ensure that actual, timely notice to customers is provided by electric utilities whenever an event disrupts service or potentially endangers public safety. The Proposed Policy Statement provides guidance to the industry and contains a series of acceptable methods for improving the timeliness and effectiveness of notice to customers during an outage.

Duquesne's comments on the specific sections of the Proposed Policy Statement Regarding Utility Service Outage Public Notification Guidelines are set forth below.

### Title 52 §69.1901. Statement of Scope

The Commission is requesting comments on whether the policy statement should apply to all utilities in the telephone, electric, gas, water/wastewater industries<sup>2</sup>. It's Duquesne's position that the Proposed Policy Statement should apply to all utility industries. Duquesne believes that, while clearly there are operational differences across the industries, unusual events occur in each industry which brings about utility service disruptions. As such, having solid processes and effective communication plans which provide clear and concise communications to customers on the utility's efforts to restore disrupted service are universal.

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<sup>2</sup> Order at Page 7

## Title 52 §69.1902 Notification Guidelines

### Subsection 69.1902(a): Acceptable methods of public notification

The Commission's Proposed Policy Statement lists six communication methods acceptable for public notifications in the event of a service interruption. Those acceptable methods include (1) facsimile/electronic mail; (2) websites, emergency phone lines and integrated voice response system; (3) an automated dialer system; (4) doorknob flyers; (5) text messaging; and (6) the emergency alert system. Duquesne Light believes this is an appropriate list of acceptable communications methods, and uses many of these methods to communicate with its customers today.

Duquesne Light believes that a comprehensive communication plan incorporates a customer education process that is not limited for use during the storm itself. Duquesne believes the key is to educate customers before storms or other major events occur so that they know how to prepare and react when a storm hits. With that, Duquesne also leverages print media, such as our customer newsletter, to communicate useful information such as tips on how to efficiently report service interruptions through Duquesne's automated Integrated Voice Response (IVR) as well as offering general safety and preparedness tips, each aimed at assisting customers prepare in advance of severe weather and potential interruptions. When severe weather hits and interruptions occur, Duquesne currently leverages newer technology to communicate updated repair status information and restoration time estimates with our customers. For example, Duquesne activates and maintains a dedicated webpage for longer outages which provides regularly updated information on restoration activities

and estimated times of restoration. Most recently, Duquesne has been exploring other communication tools and has expanded the use of web-based applications, such as “Twitter”, an internet-based social networking and micro-blogging service that enables its users to send and read messages, to keep our customers and the local media well informed of restoration efforts.

Over the last few years, Duquesne has expended great effort tailoring its inbound-call IVR technology to our customer’s needs based on their feedback. As a result, the vast majority of our customers today use Duquesne’s inbound IVR to report outages or to receive restoration time updates because it provides a quick, cost effective, and easy-to-use tool for our customers. Once the customer reports their outage or specific case of trouble, the IVR provides each caller with available circuit-specific outage information including the circuit-specific restoration time. Customers who call a second or subsequent time are provided the most recently updated information related to their specific circuit outage.

Duquesne Light does not currently have the ability to implement an outbound calling feature or process in which customers could be called back and provided outage updates due to existing system limitations. The implementation of a new technology platform to support such a feature would be a major, multi-year resource and financial undertaking for Duquesne. Duquesne sees this recommendation as cost prohibitive for the limited benefit. However, as new technology becomes available, and our customers’ interest in other technology grows, Duquesne will continue to explore implementing cost effective alternatives to use for communicating outage efforts and restoration time estimates.

The Proposed Policy Statement also states the Commission proposes development of a webpage whereby EDCs could upload outage information on a regular basis<sup>3</sup>. Duquesne supports the Commission's development of such a website, and believes that this could serve as an additional information source for customers experiencing an outage. Also, Duquesne agrees with the Commission that this new functionality should only be activated for long-term outages, such as those lasting longer than 6 hours. Duquesne respectfully suggests that the Commission clarify that the new proposed website would not be activated for short term events, but rather, reserved for use during major outages with significant restorations. Duquesne supports providing the PUC with restoration updates as it comes available and at the same time it updates outage restoration information on its own website. We would propose that the same information Duquesne posts on its website be the same information to be posted on the PUC website. This will assure a consistent message and reduce work during critical restoration times and extended service restoration periods.

In the Proposed Policy Statement, the Commission requests comments to define the thresholds for "long term outages"<sup>4</sup>. Duquesne suggests the definition thresholds for "long term outages" and "number of customers affected" thresholds should be the same as is used in 52 Pa. Code Chapter §67.1 (b), whereby reporting and notification requirements begin "when 2,500 or 5%, whichever is less, of their total customers have an unscheduled service interruption in a single event for 6 or more projected hours". These definitions have worked well and seem balanced. Also, the utilities have gauged their operations around these existing thresholds.

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<sup>3</sup> Order at Page 8

<sup>4</sup> Order at Page 8

#### Subsection 69.1902(b): NIMS Standards

This subsection states that utilities should strive to adopt National Incident Management System and its Public Information System that would organize all information throughout the utility into one, unified message. Duquesne supports this section of the Proposed Policy statement, and has in place today a centralized process to ensure consistency in all external communications is provided. In addition, Duquesne Light uses a single designated media contact to provide that message.

#### Subsection 69.1902(b)(1): Crisis Communications Plans

The Proposed Policy Statement states crisis communication plans should be in writing and follow approved NIMS standards. Duquesne supports this section of the Proposed Policy statement, and has a written crisis communication plan, which closely follows approved NIMS standards.

#### Subsection 69.1902(b)(2): Coordination

The Proposed Policy Statement states that if more than one EDC is affected in the same geographic region, strong consideration should be given to implementing a NIMS-based Joint Information System/Joint Information Center. While Duquesne fully agrees that Electric Distribution Company's (EDCs) could serve an invaluable support component for a NIMS-based Joint Information System/Center following a major event, Duquesne does not support a requirement for Pennsylvania EDCs to implement a NIMS-based Joint Information System/Center.

Duquesne Light does not feel there is sufficient outage-specific information common to multiple EDCs during a major outage event that could be provided by a Joint Information System/Center implemented by the EDCs (other than the universal generic messages to ensure safety and/or generic tips for dealing with longer-term power outages). As such, Duquesne feels implementing a Joint Information System/Center would consume resources better spent on other emergency customer and communication facilities. Storms affect different service territories differently. If there is utility specific information provided by the utility and state-wide information provided by the PUC (as noted above), Duquesne does not see a useful purpose in further adding a regional layer. In the alternative, Duquesne would suggest the NIMS-based Joint Information System/Center would be better implemented state-wide by an agency such as the existing Pennsylvania Emergency Management Agency (PEMA). The stated purpose of the National Incident Management System is to provide “a systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property and harm to the environment”<sup>5</sup>. PEMA currently manages and provides information from a variety of public service sectors. With that, Pennsylvania residents would be afforded a Joint Information System/Center that could provide customers involved in large-scale events information and timely updates on all event-related efforts and areas of assistance available from agencies including Federal, State and local government, police, fire and disaster relief agencies (American Red Cross) etc., as

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<sup>5</sup> <http://www.fema.gov/emergency/nims/AboutNIMS.shtm>



opposed to only the limited and very generalized information which could be provided and common to the EDCs.

#### Subsection 69.1902(b)(3): Public Notice Templates

This section of the Proposed Policy Statement states that “the EDCs should have public notice templates prepared in advance to be available when needed to avoid wasting critical time developing materials when confronted with an emergency situation”<sup>6</sup>. Duquesne supports this proposal. Duquesne has in place today a solid customer communication plan that includes pre-prepared information, such as a press release template, prepared outage messages for use in the Customer Service area which can be quickly tailored based on the individual event, and Operational checklists and forms for internal use to insure information is available and communicated to customers quickly. However, for clarity, Duquesne Light does not have public notice templates which are intended for direct distribution to customers, such as door hangers or pamphlets. That would be a very inefficient method for communicating with the public. Rather, you want your resources restoring service and outage information being disseminated from a central point person and telephone.

#### Subsection 69.1902(c): Contact Information

Subsections (c) and (c)(1) of the Proposed Policy Statement states utilities should consider having a knowledgeable contact person stationed in the area of the outage during the emergency to communicate to the public and media, and that a single point of contact should be established as the sole media spokesperson for the utility for

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<sup>6</sup> Order at Page 15

that time period. Duquesne Light supports this provision of the Proposed Policy Statement, and has in place today an employee who is Duquesne's single point of contact for all media requests.

During the restoration efforts following the September 14, 2008 wind storm, Duquesne's Media and Public Relations Supervisor conducted approximately 35 television, 30 radio, and 70 newspaper interviews in an effort to keep the media and public well informed of our restoration efforts. Outage and restoration information was communicated to our customers and the media every two hours for the first three days following the storm, and updates after that followed the media news cycles (5 a.m. 6 a.m. Noon, 4 p.m., 5 p.m., 6 p.m., 10 p.m. and 11 p.m.). Duquesne supports Subsection 69.1902(c) of the Proposed Policy statement.

#### Subsection 69.1902(c)(2): Talking Points and Informational Sheets

The Proposed Policy Statement states that "talking points" and "informational sheets" should be provided to customer service representatives, linemen, and all others who may come in contact with the public during the course of the outage striving toward consistency of the message. Duquesne agrees with the intent of this subsection to strive toward delivery of a consistent message, and has in place today a process whereby public notification updates on restoration efforts are created by Duquesne's Media and Public Relations Supervisor and distributed to all Customer Service personnel. With that, Duquesne can be assured that information a customer hears from an agent in the Call Center is the exact same information they hear on the television or radio.

While Duquesne agrees with this subsection's intent to strive toward delivery of a consistent message, Duquesne is concerned and disagrees with the Proposed Policy Statement requiring that "linemen and all others who may come in contact with the public" be provided information to discuss with customers. For years, Duquesne has reinforced with our field repair crews that they should be referring any media inquiries to the company's Media and Public Relations Supervisor, or customer inquiries and discussions related to restoration efforts or restoration times to the Customer Service Representatives, and then go on with the specific repair work assigned to them. Duquesne does not support pulling these field repair crews off their assigned restoration service jobs, as would be required, so they could receive, review and familiarize themselves with the latest system-wide restoration efforts and talking points. Given the frequency of updates which were provided to the media described earlier in these comments (four updates within a six hour period), it is doubtful that field personnel would actually have time to perform system repair work. At the very least, it would be imprudent to remove linemen from their critical work to restore service to customers to brief them on such matters. Duquesne's position is that Subsection(c)(2) should be amended to exclude "linemen and others who may come in contact with the public" from the list of those to receive updated press releases, talking points and information sheets, and suggests it be reworded as "Talking points or informational sheets should be provided to customer service representatives and all others responsible for communicating restoration information to customers or the public during the course of the outage to strive toward consistency in the message".

## Cost Benefit Analysis Policy Statement Recommendations

As stated throughout Duquesne's comments, the vast majority of the recommendations made in the Proposed Policy Statement are in place today with Duquesne. However, Duquesne is concerned that a few of the proposals would not be cost effective. The purchase and implementation of an outbound autodialer system to provide all customers outage information updates would not be cost effective. Extremely preliminary and order of magnitude costs estimates to implement new technology platforms to support such functionality gives Duquesne Light great concern about the value of this recommendation at this time.

Duquesne is also concerned with the requirement to include linemen and other field personnel in the group of employees to receive talking points and outage response update information. This would greatly extend the actual system repair time, which Duquesne feels is an unacceptable result.

## Conclusion

Duquesne agrees with the Commission that clear and concise information provided to customers experiencing service interruptions minimizes their frustration. Duquesne generally supports the majority of the recommendations contained in the Proposed Policy Statement, and applauds the Commission for the guidance they provide to the electric industry on acceptable methods of public notifications for restoration information during extended service interruptions.

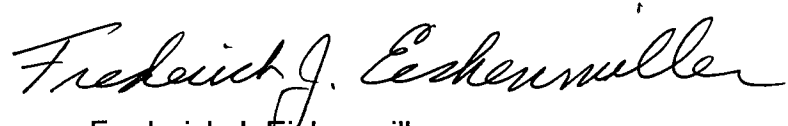
Duquesne supports the recommendations for the use of websites, IVRs, and newer internet-based technology to keep customers and local news media informed and updated on the most recent information available. Duquesne also supports and has in

place today crisis communications protocols as established within the NIMS communication standards to insure all information throughout the company is organized into one unified message, including having a single designated media contact.

Duquesne opposes the need to undertake major programming changes and the implementation of new technology platforms to enable outbound "autodialer" calls providing updated outage information to customers based on its estimated cost. Also, Duquesne does not support and respectfully suggests not including field repair, such as linemen personnel in the list of employees to receive talking points and restoration updates due to the disruption that would be created in making repairs to damaged facilities. Duquesne also does not support establishing a Joint Information Center to coordinate responses across multiple utilities in the same region affected by an incident, and recommends as an alternative providing support to existing organizations providing similar service today.

Duquesne Light appreciates the opportunity to comment on the Commission's proposed Policy Statement Order, to explain Duquesne's communication processes and to restate Duquesne's commitment to the restoration of service when outages occur.

Respectfully Submitted,



Frederick J. Eichenmiller  
Director, External Affairs  
Duquesne Light Company

Dated: April 7, 2010