

Philadelphia Gas Works

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VIA ELECTRONIC FILING AND FIRST CLASS MAIL

ATTN: James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg , PA 17105-3265

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

Dear Secretary McNulty:

Enclosed for filing please find the Comments of Philadelphia Gas Works in the above referenced docket.

Please contact me at the above number if you have concerns.

Very Truly Yours,

Denise Adamucci

cc: Elizabeth Barnes (Via email; ebarnes@state.pa.us)

Enclosure

**BEFORE THE
PENNSYLVANIA UTILITY COMMISSION**

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

COMMENTS OF PHILADELPHIA GAS WORKS

I. INTRODUCTION

Philadelphia Gas Works (“PGW”) respectfully submits these Comments to the Pennsylvania Public Utility Commission (“Commission”) in response to the Proposed Policy Statement Regarding Utility Service Outage Notification Guidelines (“PS”) published in the Pennsylvania Bulletin on March 6, 2010 (40 Pa.B. 1210). The purpose of the PS is to help ensure that actual, timely notice to customers is provided by electric distribution companies whenever any event disrupts service or potentially endangers public safety. The Commission has also invited comment on whether the PS should apply to natural gas companies. While PGW offers suggestions and feedback on some of the proposals set forth in the PS, it does so without waiving its rights to assert that a proposed policy is a violation of law. PGW appreciates this opportunity to provide the Commission with its comments.

II. COMMENTS

(a) § 69.1901 and 1902

PGW respectfully submits that it is not necessary to include gas utilities in the scope of the PS. Larger scale or recurrent gas outages have not been a problem. Thus the burdens of some of these new requirements, including but not limited to potential monetary burdens, do not match a corresponding need of natural gas customers. In addition, PGW has trained a significant

number of its supervisors, managers, and executives in the principles of the National Incident Management System (NIMS) (including management employees to the level of ICS-400) and would utilize the NIMS Incident Command System (ICS) when managing a widespread service outage/interruption.

Assuming gas utilities are included in the scope of this PS, PGW comments as follows. In accordance with ICS, PGW's communication methods would differ depending on the type and severity of an interruption – for this reason all of the acceptable methods of notification under this PS should be utilized at the discretion of the utility. Further, PGW believes it is essential that public notifications be somewhat limited until sufficient information has been gathered by the utility, in order to ensure that incorrect information is not reported to the media or customers.

(b) § 69.1902(a)(1)

While PGW agrees that media updates should be provided throughout the duration of an event (depending on its severity), instead of a fixed schedule of updating the utility should provide updates when it obtains new, material information.

(c) § 69.1902(a)(2)

PGW does not have the current systems or capability to report interruptions on a number of customer basis. For example, in the event of an outage in a low pressure system area, PGW would only have knowledge of the area affected and an estimated number of customers affected. In addition, given that gas interruptions are generally smaller in scale it is likely more manageable and beneficial for the utility to provide personalized updates to customers who call by phone. Absent a larger scale, longer term outage, customers may prefer to call PGW and obtain such information by phone communications.

(d) § 69.1902(a)(3) and (5)

PGW does not have an automated outbound dialer system or email/text messaging notification system which could be utilized in the manner proposed in these subsections. Given that larger scale outages would be unusual for PGW, PGW does not believe that incurring the costs of purchasing such systems would be prudent.

(e) § 69.1902(a)(4)

In the context of the PS, PGW believes that doorknob fliers are generally not as effective or practical as other methods of communication, particularly given the time required for printing flyers and dissemination (in a situation which may be rapidly changing).

(f) § 69.1902(c)(2)

While PGW would provide information to customer service representatives and others who are likely to come in contact with the public during a larger scale outage, PGW submits that it should not provide linepersons with information designed for public communication and distribution. Such workers' focus must remain on remedying the outage on a timely basis. Additionally, it could be unsafe for linepersons to engage in communications with consumers and the media while working on an outage. In accordance with NIMS and ICS, Public Information Officers (as defined under ICS) would be established. Customers and media on the street should be referred to such persons.

III. CONCLUSION

PGW appreciates the opportunity to present comments to this proposed PS.

Respectfully Submitted,

/s/ Denise Adamucci_____

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