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VIA FEDEX NEXT DAY

April 6, 2010

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

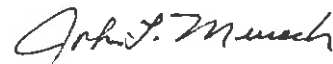
Re: Proposed Policy Statement Regarding Utility Service Outage Notification Guidelines;
Docket No. L-2008-2065532

Dear Secretary McNulty:

West Penn Power Company d/b/a Allegheny Power appreciates the opportunity to review and provide comments on the above-captioned Proposed Policy Statement.

This filing is filed by FedEx Next Day delivery and electronically and is deemed filed today.

Very truly yours,


✓John L. Munsch
Attorney

JLM:sac

Enclosures

cc: Elizabeth Barnes, Esquire (ebarnes@state.pa.us)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS OF WEST PENN POWER COMPANY d/b/a
ALLEGHENY POWER**

West Penn Power Company d/b/a Allegheny Power (“Allegheny Power” or “Company”) provides Comments on the Proposed Policy Statement of the Pennsylvania Public Utility Commission (“Commission”) concerning public notification guidelines for utility service outages. The Proposed Policy Statement was entered by the Commission November 10, 2009, and published in the March 6, 2010, *Pennsylvania Bulletin*.

Section 69.1902(a)(2)

With respect to the Guidelines’ recommendation that EDCs maintain a section of their websites dedicated to emergency restorations, Allegheny Power points out that it does post real-time outage information on its website twenty-four hours per day every day. When large outage events occur, the Company creates a new page on the website to provide additional information. Posting information (twice a day) to a proposed Commission website would not be necessary and could lead to redundant and sometimes conflicting information. Rather, Allegheny recommends that the Commission website be linked to the location where the Allegheny Power information would be available.

Section 69.1902(a)(5)

The Proposed Policy Statement and Section 69.1902(a)(5) of the proposed Guidelines recommend that utilities use best available technology to share information with the public, including electronic mail and text messaging. Allegheny Power presently does not have the capability to effectively and efficiently email or text message notification to affected customers. The Company's Smart Meter Implementation Plan, including the modernization of the Company's customer information system which is an integral part of enabling smart meter technology, will allow electronic notification to affected customers.

Section 69.1902(b)

The Commission recommends that EDCs apply the principles of the National Incident Management System ("NIMS") when managing widespread outages. Allegheny Power notes that its Crisis Communications Manual was updated to conform to its emergency operation manuals, which conform to NIMS standards.

The Company has reservations and issues relating to the application of NIMS standards under the policy statement. The NIMS standard is very broad and detailed and may direct a command authority outside of the particular EDC or may envision a restoration procedure that is not feasible. The Company is uncertain how detailed Allegheny Power's structure and processes should be to mirror the NIMS standards. More specific guidance from the Commission regarding expectations for implementing the NIMS standard within the Company would be helpful. A few examples of concern are as follows:

- The NIMS standard is a multi-agency approach. Is it the Commission's intent for the Company to apply NIMS principles only to its internal operations or to apply

NIMS principles to coordinate and operate with government and non-government agencies for each county? Coordination and operations through the NIMS standard approach with agencies such as county and township road departments, for example, would require significant effort. To comply with NIMS standards would require additional staffing and infrastructure investment.

- The NIMS preparedness cycle includes extensive training and drilling components (including drilling for mock events) to ensure NIMS compliance. What is the expectation of the Commission for the Company to train and drill outage events on an annual basis? Allegheny Power averages 20 to 30 restoration-of-service events each year. What would be the training and drill requirements, given this frequency of events on an annual basis?
- Allegheny Power has written procedural documents for preparedness. How will it know that these documents meet the Commission's expectations regarding compliance to the NIMS standard?
- The NIMS standard requires personal qualification and certification of employees. Is the Company's present classification of physical and non-physical employees adequate according to the Commission to meet this requirement?
- The NIMS standard requires that equipment be certified for mutual assistance use. This is not necessary for the Company's current practices for mutual assistance and everyday use. Does the Commission intend to implement a program to require equipment certification?

Section 69.1902(b)(2)

The Commission recommends that a joint information center be established when multiple utilities are affected by a widespread outage. If there is a widespread storm affecting western and central Pennsylvania, several utilities would have to collaborate in creating the joint

center, including Duquesne Light, Allegheny Power, PPL, UGI and the three FirstEnergy companies, Penn Power, Penelec and Met Ed. The joint information center could create a logistical problem for utilities and is certainly not practical on an ad hoc basis. A joint information center would clearly require significant organization prior to the emergency, including training, testing establishment of new communication procedures among the utilities.

It is also unclear in the recommendation which utility would take the lead in establishing a joint information center. The joint information system would also have to coordinate efforts closely with the Pennsylvania Emergency Management Agency and local emergency management agencies to avoid duplication of effort.

Section 69.1902(c)(1)

The Proposed Policy Statement recommends that utilities use a single point of contact within the company when communicating with the media during a widespread outage. Allegheny Power recognizes that designating a single spokesperson facilitates effective and consistent communication with the media, and Allegheny uses a single point to the extent practical. The Company notes, however, that more than one person may be required to respond to all of the media inquiries in a widespread outage event. With most storms and the associated power outages, the situation is fluid and different media outlets need different information and perhaps varying levels of expertise not residing in a single spokesperson. The Company also points out that, given its wide and diverse geographic service area, it may not be practical to have a single contact when different areas of the service area face different problems, and thus, flexibility is required.

Section 69.1902(c)(2)

The Proposed Policy Statement recommends that EDCs distribute a single set of talking points to all persons within the EDC who have contact with the public. Such a set of talking points could be prepared at the beginning of the day and placed on the Company's internal electronic site. This recommendation may be unworkable, however, given that emergency situations are dynamic and field personnel would have limited ability to receive updates during the day. Given that field crews communicate infrequently with the general public, the effort required to update field personnel during the day may be inefficient. In general the Company is concerned that restoration efforts may be delayed in order to ensure all employees have common talking points each morning or throughout the day as an outage event unfolds.

The Company also emphasizes that estimated restoration times constantly change and are inherently unpredictable. A common cause of unpredictability, and a major source of customer frustration, occurs when a damaged portion of an electrical circuit is repaired, but additional damage, downstream on the circuit and unknown at the time of the original estimate, prevents the circuit from being restored in the time originally estimated. Certainly messages should be coordinated, but it must be recognized that restoration predictions do change. Field personnel should be discouraged from providing information on estimated restoration times, other than the specific repair they are working on.

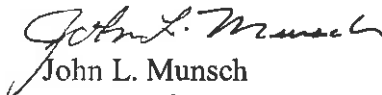
Conclusion

Allegheny Power emphasizes that widespread outage events require flexibility on the part of EDCs in their communication with the public, the media, and local and state emergency

agencies. The Commission should be cautious to avoid rigid guidelines that might hamper EDCs' decision-making flexibility in an emergency situation.

Respectfully submitted,

Date: April 6, 2010


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