The United Illuminating Company

Emergency Response Plan

July 1, 2020

REVISION HISTORY

Revision	Release Date	Remarks
0	8/10/11	Draft plan for review by UI team
0.1	9/27/11	Revised plan for review by UI team
0.2	10/31/11	Final draft for review by UI team
0.3	11/14/11	Updated final draft incorporating input from UI team
0.4	11/15/11	Updated final draft incorporating input from UI team
0.5	11/21/11	Updated final draft incorporating input from UI team
0.6	07/20/12	Include language for Public Act 12-148
0.7	07/30/12	Include more specific make safe language and updated Event Levels
0.8	09/17/12	Changes in response to Docket 12-06-11 Final Decision 08/31/12 Added text to indicate EPP would be invoked for different causes of the emergency Added language conveying UI has plans for dealing with non-electric emergencies Added language to indicate UI will file plan bi-annually, unless reasons to do so require more frequent filings (III.A.B.2.a) All Hazards reference (III.A.1 and III.A.2) All Hazards reference (III.A.1 and III.A.2) and 24x7 contact requirement (V.B.14) Added Major Storm language (Docket 86-12-03) Added language on two additional Activation Levels (Monitoring and Alert), based customer percentages on May 1, 2012 customer counts, and adjusted Level 4 and 5 by adding a day to restoration estimates to cover make safe/road clearing. Additional EPP changes are noted in each of the Appendices following this Plan, specifically Appendix 8 - HR, Training, and Safety, which covers adequacy of staffing levels (III.B.2.c and d) and Appendix 10 – Logistics, which covers equipment review (III.B.2.b and d).
0.9	10/03/2012	Removed language indicating EPP would be invoked for different causes of emergencies and that UI has plans for dealing with non-electric emergencies. The EPP deals with electric emergencies only.
.10	3/15/2013	Changed Incident Manager to Incident Commander throughout document. Changed Emergency Preparedness Plan to Emergency Response

		Plan in the document header and throughout document. Changed the acronym EPP to ERP throughout document. Included statement on page 32 - Section 4.e - PURA reporting requirements regarding mutual assistance group membership. Included statement about using ICS guidelines to manage additional resources on page 39. Changed 'Finance and Admin' to Finance. Updated Event Level Classification, Figure 6.1, added Event Level Weather Predictors table, added Staffing Needs by Event Level table, and updated Plan Activation Matching Guidance table. Added Operations Regions graphic.
.11	7/30/13	Updated all Organizational Charts Added information on the National Response Event criteria.
.12	8/10/15	Changed event levels – they are reversed to reflect FEMA levels
.13	6/3/16	Minor edits for clarity.
.14	7/1/17	Updated all Organizational charts to be in alignment with Avangrid ERP titles Avangrid Area Command Structure included Escalation matrix revised for winter weather Crew resources updated The Planning Section updated due to Operational Excellence Initiatives Tools
.15	7/1/18	Escalation matrix revised for tornado Planning Section Revisions: •Revised/added wording defining roles to participate in annual training •Revised wording for all roles responsibilities to create, maintain and file Activity forms •Added - IT to Planning Team Chief checklist to notify IT in advance to setup additional ADMS workstations in 213, 214 •Added – to ensure tracking of iPads and associated equipment •Enhanced wording when Damage Assessors are standing by downed wires. •Updated table Section 4 "Staffing Levels by Event" to reflect DA Drivers to accompany the Damage Assessors •Removed reference to specific computer applications.
.16	7/1/19	Organizational changes to align with Incident Command Structure (ICS)
.17	7/1/2020	Added a Deputy Incident Commander to oversee all internal and external communications. Revised organizational charts to further align with ICS and Avangrid operational roles. Revised the organizational structure of the Transmission & Substation Branch to align with day to day operations of the system.

INSERT PROMULGATION LETTER

THE UNITED ILLUMINATING COMPANY
EMERGENCY RESPONSE PLAN

EXECUTIVE SUMMARY

BACKGROUND

The United Illuminating Company (UI) Emergency Response Plan (ERP) is designed to provide a systematic approach to plan for, identify, assess and recover from the effects of an emergency in the safest and most efficient manner possible. The plan serves as a guide to assist management and response personnel in identifying the resources, materials and steps required for a safe and efficient restoration process. This plan provides the high level strategy and consolidates coordination of procedures for the emergency preparedness, communications, and response and restoration process.

PLAN ORGANIZATION

The ERP is separated into three key sections: Organization and Functions, Operating Guidelines and Appendices. The Organization and Functions section includes an overview of the Emergency Response organization, provides a description of the key functions, and describes the restoration organization. The Operating Guidelines section is comprised of pre-event preparations, plan activation and event level classification. The Appendices section, which is located as a separate document, is comprised of specific position guides, procedures and checklists related to event and post event activities.

INCIDENT COMMAND SYSTEM

The ERP is based on the Incident Command System (ICS), which is a nationally recognized system for managing incidents. The ICS is the foundation of the National Incident Management System (NIMS) and the National Response Framework (NRF). The use of this system is required by government regulation for hazardous materials and environmental response incidents and is the form of response for federal, state and local first responders. It is also a requirement for utilities to operate under this system by CT PURA.

The ICS organization is built around the major functions that are applied to any incident, large or small. The system provides a centralized management structure to enhance communication and coordination between decision-makers. The ICS provides the ability to fill only those parts of the organization that are required to respond to the event or incident. ICS establishes lines of supervisory authority and temporary formal reporting relationships and maintains a manageable span of control in each section of the organization.

EMERGENCY RESPONSE PLAN OVERVIEW

The ERP defines the management structure and outlines response activities for extensive emergency incidents. Responsibilities are based on a functional approach to provide the appropriate skill sets required to most effectively support response activities. The ERP develops in a modular fashion based on the nature and size of the emergency. This permits responses that are flexible enough to control incidents of any

size and provides for efficient integration of diverse response activities. All or part of the ERP will be activated based on the severity, classification, and assessment of the incident. At the Avangrid level there is an area command structure that can be utilized depending on the size of the event.

PLAN IMPLEMENTATION

Implementation of the ERP relies on pre-identified pools of employees that are available to support the needs of the company during an emergency. All UIL Holding Company employees will have a role in the outage restoration process, regardless of their day-to-day responsibilities. Employees may fill positions within the ERP organization that are different than their day-to-day job. Personnel filling a role within the ERP are part of a temporary management structure that is activated during the response efforts.

Service restoration priorities may vary based upon the magnitude of the system damage, duration of the storm, and field conditions. The general sequence of service restoration is as follows:
- Immediate Life Threatening Situations, Public Health and Safety
- Substations, Transmission Lines, Primary Distribution Feeders
- Single and Three-Phase Laterals
- Distribution Transformers and Services

In order to facilitate communication and response efforts, events have been classified into eight levels. These levels are based upon the incident severity, electric system damage, outages reported, resource requirements, and the restoration strategy. When an incident is assigned a level, response personnel will have an understanding of the severity of an event and be able to respond in an appropriate manner.

Typically the Manager of Operational Readiness determines the initial activation level. The implementation of the ERP then becomes the responsibility of the Incident Commander. Once the Incident Management Team is activated, the Incident Commander assumes responsibility to evaluate the situation and determine the appropriate level of staffing for the supporting organizations.

TRAINING, EXERCISES AND POST EVENT REVIEWS

The successful implementation of the ERP requires that many employees shift from their normal business activities to assume a different set of roles and responsibilities. Employees need to participate in training and exercises in order to become proficient at these roles. Post event evaluations contribute to continuous ERP improvements. Response performance is most likely to improve when feedback recommendations are linked and incorporated into the plan along with revised or new departmental support procedures soon after the actual event or exercise.

SECTION 1 - ORGANIZATION AND FUNCTIONS

1. INTRODUCTION

    a. Plan Overview

The United Illuminating Company (UI) philosophy provides the basis for the emergency response and restoration strategy: to safely and efficiently restore electric service in a minimum amount of time. The Emergency Response Plan (ERP) uses this principle to establish guidelines for pre-incident preparedness, pre-incident planning, incident assessments, incident response, communications, and return to normal operations.

The ERP provides guidelines to ensure timely communication and coordination between company organizations, departments, operations personnel, and key decision makers. It also outlines the coordination required between UI and various outside agencies to ensure a timely and effective response to an outage restoration related emergency.

The ERP describes the Incident Command System (ICS), whose structure and principles are used to manage an incident or emergency. This allows the organization to effectively expand or contract to fit the needs of the emergency.

The purpose of this plan is to provide an overview of: pre-event preparations; the response organization; the assessment and restoration process following an event; and to document the linkages to related functional processes, procedures, checklists, and job aids.

    b. Plan Scope

The ERP is designed to provide a systematic approach to recover from the effects of an emergency in the safest and most efficient manner possible. It is intended to maintain flexibility so that specific details of service restoration can be tailored to address varying incidents. The plan provides guidance to assist management and response personnel in identifying resources, materials, and priorities required for an efficient restoration process. The plan also outlines the process for communicating with key stakeholders.

Function specific roles and descriptions in support of this plan with detailed instructions for restoration are covered in Appendices 2 through 10 (which are not part of this document). This plan provides the high level strategy and consolidates coordination of procedures for the emergency preparedness, response, and restoration process.

In the event of multiple incidents or a complex large-scale single incident, corporate support may be required to assist the emergency response efforts. The ERP defines the management structure and outlines response activities for extensive emergency incidents. Responsibilities are based on a functional approach to provide the appropriate skill sets required to most effectively support response activities.

While many events can necessitate the need for an emergency response, the most common is severe weather. As such, the initial incident analysis usually takes the form of evaluating weather forecasts. The company maintains contracts with multiple professional meteorological service vendors to provide tailored weather forecasts and detailed meteorological information. Publicly available weather information is also used to provide further validation. For a significant weather event, field deployment will take place as soon as it becomes safe for UI personnel to travel or perform the assigned work tasks according to OSHA regulations and guidelines.

Other incident types are defined in Table 1.1 below but these definitions do not encompass the full range of incidents that could potentially affect UI electric system operation.

Table 1.1

Type of Event	Description
Storm Event	Forecasted Weather Event In the event that a severe weather forecast is received from a weather forecast, the Manager of Operational Readiness will disseminate the information as appropriate. The Manager of Operational Readiness will be responsible for determining if a conference call with the appropriate Incident Management Team members should be conducted to determine the extent of pre-event preparations based on the forecasted severity of the approaching weather. The Manager of Operational Readiness will gather additional information on the forecast using any other available weather related resources. Based on the information received, the Manager of Operational Readiness referring to the event level matrix will determine the initial storm response level. Unanticipated Weather Event When initial reports from the Customer Care Center or incoming calls to the System Operator indicate that some portion of the electric system's infrastructure has sustained damage, the System Operator will notify the on call Incident Commander (or their designee). The Incident Commander will inform other Incident Management Team members as to weather conditions and damage to facilities. At this time it will be mutually agreed as to what resources are required. If the damage is considered severe enough, the Incident Commander will make a recommendation to activate the ERP in its entirety to the Vice President, Electric System Operations.
UI System Event	The United Illuminating Company System Blackout Events or circumstances may occur that lead to partial or total system collapse. This type of restoration is carried out under the direction of

Type of Event	Description
	CONVEX.
	Substation Events The loss of a substation(s) resulting in the loss of customer load.
	Transmission Events The loss of multiple transmission lines or a facility resulting in the loss of customer load.
	Distribution Event The loss of multiple distribution feeders or bus sections resulting in the loss of customer load.
CONVEX System Emergency	Load Shed CONVEX-initiated emergency resulting in the loss of customers. CONVEX and UI publish specific emergency procedures to address UI's responsibilities to respond to CONVEX-initiated emergencies, see UI OP-E07. This procedure is carried out under the direction of CONVEX.

The concept of operations for how the ERP will be carried out will focus on the following preparedness, response, restoration and recovery functions:

- Outline pre-event preparations.
- Development of an overall strategy for dealing with the event.
- Establish an organizational structure that provides centralized oversight of outage restoration activities.
- Establishment of the UI Emergency Operations Center (UI EOC).
- Obtain an overall assessment of the scope of the event and the impact on the company.
- Support of restoration and recovery efforts through the procurement and allocation of personnel, equipment, materials, and other resources, particularly those from unaffected areas and outside resources.
- Optimize the use of corporate assets.
- Designation of employees responsible for activating and participating in the emergency response and restoration process, specifying their area of responsibility, and identifying back-up personnel.
- Provide for a centralized dissemination of information, both internally and externally, to stakeholder groups.
- Ensure communications with the public, customers, media, regulatory agencies, and federal, state, and local governments operate effectively in order to exchange accurate and timely information on system conditions and restoration activities.
- Ensure that restoration progress updates are reported in a timely manner by field personnel.
- Identify guidelines for training, drills, and evaluations to continually refine procedures and improve outage restoration performance.

- Ensure that there are enough qualified personnel to fill all necessary positions.
- Gather information necessary to complete all post incident reports.
- Coordinate with telecommunications companies to provide timely and effective service restoration to their critical facilities (i.e. cellular phone towers, etc.).

c. Planning Assumptions

Safety is the core value – for our personnel, our customers, and our communities.

The safe and timely restoration of utility services will be of the utmost importance to mitigate damage to UI infrastructure, financial health, and the local economy.

All UI employees will have a role in the outage restoration process, regardless of their day-to-day responsibilities. That means that employees may fill positions within the ERP organization that are different than their day-to-day job. Employees may be assigned to different ERP positions depending upon the nature of the emergency and the needs of the organization.

Effective communications with internal and external stakeholders, including the media, governmental and regulatory authorities, and the financial community will be essential to assist stakeholder groups in their response to the emergency

Timely and accurate reports from the field are an essential component of the emergency restoration process.

Performing damage assessment and restoration activities utilizing available technology throughout the storm restoration process is an essential component of the emergency restoration process.

Emergency response position training and succession planning is vital to an effective emergency preparedness program.

During a major disaster or emergency that has large scale and wide-spread effects throughout the region on customers, communities, employees, and facilities, UI may manage an extensive restoration and recovery operation that will require the coordination and integration of federal, state and local agency assets into the response efforts.

UI resources, such as equipment and personnel, may be supplemented with private resources and perhaps by federal, state and local resources in order to address the demand for restoration of electrical service.

If a major event is forecasted to have a significant impact on the service territory, UI may need to commit to external contractor resources, and start the communications process to obtain mutual assistance resources, well in advance of the event in order to ensure that estimated external resource needs can be met. UI will notify the Connecticut

Public Utility Regulatory Authority of its strategy to solicit for mutual assistance resources.

In a major event, damage to transportation infrastructure components may cause shortages of critical supplies, such as food, water, and fuel and may require alternate delivery methods.

d. Plan Format

This plan is divided into three key sections: **Organization and Functions**, **Operating Guidelines and Appendices**. The **Organization and Functions** section includes an overview of the emergency response organization, provides a description of the key functions and is comprised of the following:

- Introduction
- Response Leadership and Responsibilities
- Restoration Organization
- Compliance

The **Operating Guidelines** section is comprised of the following:

- Pre-Event Preparations
- Activation and Event Level Classification

The **Appendices** are comprised of specific position guides, procedures and checklists related to event and post event activities. The Appendices are located in a separate document.

e. Plan Development and Maintenance

The Manager of Operational Readiness has overall responsibility for the maintenance of this plan (including appendices) and for ensuring that necessary changes and revisions to the plan and appendices are prepared, coordinated, approved, and distributed. The Manager of Operational Readiness will also ensure that the plan is reviewed and updated on an on-going basis as needed based on identified opportunities for improvement through exercises, changes to the operating environment, and items identified during actual implementation of the plan. Plan reviews and updates will be made as warranted during the year, but no less than annually. Emergency response and outage restoration personnel assignment needs will also be updated annually, or as needed during the year.

The ERP is developed and tested in coordination with appropriate internal departments and public agency stakeholders. It includes references to various department specific and governmental plans and these referenced plans will be maintained by the specific department or public agency.

UI will submit its ERP to the PURA for review of the emergency plans every two years, on or before July 1st, pursuant to the General Statutes of Connecticut (Conn. Gen. Stat.) §16-32e. UI will also file the ERP in full when there have been any material changes in the ERP.

      f.   Plan Distribution

The ERP will be available on the UI Intranet site with hard copies available as needed. It will be filed with the State of Connecticut Public Utilities Regulatory Authority (CT PURA) minimally on a biennial (every 2 years) basis in accordance with the required filing dates, as major changes are made to the plan, or as regulations require. It will also be made available to the following State of Connecticut agencies:

- Department of Energy and Environmental Protection (DEEP)
- Department of Emergency Services and Public Protection (DESPP)
- Division of Emergency Management and Homeland Security (DEMHS)
- Local Municipalities

The plan will also be made available to any telecommunications company served by UI upon request.

This plan is confidential and shall not be shared with any organization outside of UI, other than those identified above, without the approval of the Vice President Electric System Operations and the General Counsel.

2. RESPONSE LEADERSHIP AND RESPONSIBILITIES

a. Officers, Directors, Managers and Supervisors

All officers, directors, managers and supervisors ensure compliance with the Company's ERP within their respective organizations. They also ensure that appropriate Incident Management Team positions are filled and staffed when needed. The implementation of the ERP requires that employees shift from their normal business activities to assume a temporary set of roles and responsibilities. Leadership recognizes that employees need to receive training and opportunities to practice in order to perform these activities in a safe and effective manner during a real emergency.

During an emergency, the role of executive leadership is to provide strategic and policy oversight, approve large expenditure requests, act as a statesperson to key stakeholder groups (employees, investors, board of directors, etc.) and act as a media or regulatory spokesperson, when necessary. Executive leadership will provide support to the Incident Commander and Incident Management Team members, when requested, to enable them to perform their duties as outlined in this plan.

The role of directors, managers and supervisors is to ensure that personnel are released from their day-to-day responsibilities to fill roles within the Emergency Response Plan. The Incident Commander will convene the Incident Management Team members, transition to the role of Incident Commander and oversee the emergency restoration event.

b. Employee Staffing Requirements

Effective emergency or outage restoration response requires that all employees be prepared to assume their assigned role and work extended hours in the event of an emergency. It is expected that all UI employees will have an emergency assignment and will be prepared to report for emergency or outage restoration duty as soon as it is safe to do so or in advance of an event if prior warning is received.

Estimated staffing levels for each event level can be found within the respective team appendix (Appendix 2 through 10). Staffing level estimates by event level are intended to be a guideline for use as a resource planning tool. Due to the varied nature of emergency events, actual resource needs can vary and will be determined on a case by case basis. Therefore the estimates contained in these appendices are not intended to be a required level of resources, nor should they be interpreted as such.

Each employee will be assigned an emergency storm response role or roles based upon their background and experience, the needs of Incident Management Team leaders, and the associated plans. The emergency storm assignment list will be compiled and stored in a centralized location. The Director of Electric Systems and the Manager of Operational Readiness, working with subject matter experts, will be responsible for development and maintenance of the emergency storm assignment list.

c. On-Call Responsibilities

Each Section Chief or designee will maintain up-to-date call-out procedures and employee rosters to ensure adequate staffing levels can be achieved for the appropriate emergency level.

UI will adhere to appropriate collective bargaining unit agreements regarding call-out of bargaining unit personnel for augmentation of resources.

d. Call-Out Procedures

Call-outs will be made by ARCOS for those personnel covered by the system. All other personnel will be called out by their respective supervisor or Incident Management Section Chief or Officer (i.e. Deputy Incident Commander, Safety, Planning, Finance, Operations, and Logistics). In the event that an employee does not have a specific assignment, the Manager of Operational Readiness will be responsible for identifying and notifying those personnel of their assignment.

e. Extended Assignments

If employees are expected to be away from home for an extended period of time, supervisors are expected to remind their employees to have an adequate supply of prescription medication, clothing and other personal items; and that employees have developed a communications plan for contacting family members during disasters.

f. Emergency Facilities – Locations

Following is a list of facilities or incident management locations that may be activated.

			**INCIDENT MANAGEMENT LOCATION ACTIVATION CHART**
LOC.	**ROLE / FUNCTION**	**LOCATION**	**EVENT LEVEL**
			5	**4**	**3**	**2**	**1A**	**1**
1	Crisis Management	180 Marsh Hill Rd Orange, CT 06477				✓	✓	✓
2	UI Emergency Operations Center	100 Marsh Hill Road Orange, CT 06477	✓	✓	✓	✓	✓	✓
3	System Operation Center	100 Marsh Hill Road Orange, CT 06477	✓	✓	✓	✓	✓	✓
4	Media	180 Marsh Hill Road Orange, CT 06477	✓	✓	✓	✓	✓	✓
5	Fleet Services	100 Marsh Hill Rd., Orange, CT 06477		✓	✓	✓	✓	✓
6	Warehouse	100 Marsh Hill Rd., Orange, CT	✓	✓	✓	✓	✓	✓
7	Orange Work Center	100 Marsh Hill Rd., Orange, CT 06477	✓	✓	✓	✓	✓	✓
8	North Haven Substation	485 Washington Ave North Haven, CT 06473			✓	✓	✓	✓

LOC.	ROLE / FUNCTION	LOCATION	EVENT LEVEL					
9	Annex Property	491 Washington Ave North Haven, CT 06473			✓	✓	✓	✓
10	Primary Staging Location B	Trumbull Mall 5065 Main Street Trumbull, CT 06611			✓	✓	✓	✓
11	Primary Staging Location C	Quinnipiac University 3159 Whitney Ave Hamden, CT 06518			✓	✓	✓	✓
12	Primary Staging Location D	Milford Mall 1201 Boston Post Rd Milford, CT 06460			✓	✓	✓	✓
13	Secondary Staging Location A	Eisenhower Park			✓	✓	✓	✓
14	Secondary Staging Location B	179 Old Gate Lane Milford, CT			✓	✓	✓	✓
15	Secondary Staging Location C	UIL Gas Utility Facility Trumbull, CT			✓	✓	✓	✓
16	Secondary Staging Location D	Site specific areas found near damaged facilities.			✓	✓	✓	✓
17	Service Location	100 Marsh Hill Rd., Orange, CT 06477	✓	✓	✓	✓	✓	✓

Table title: **INCIDENT MANAGEMENT LOCATION ACTIVATION CHART**

g. Event Record Keeping

Accurate record-keeping is needed to effectively document the response and restoration efforts. Written records will assist in developing effective post-event After-Action reviews.

All departments and personnel involved in the planning, response and restoration efforts should follow the appropriate UI record keeping procedures to record up-to-date information in a timely manner. All Company reporting, record keeping and record retention requirements should be followed according to corporate policy. The types of records to be collected and retained are:

- Event Description
- Impact Summary
- Outage History
- Damage History
- Resource Utilization History
- Activity Logs
- Completed Checklists
- Restoration and Recovery Costs
- After-Action Reviews

The Manager of Operational Readiness and/or each Section Chief or Officer will convene their respective groups to conduct and document their respective teams After-Action report. Each group After-Action Report (AAR) will then be submitted to the Manager of Operational Readiness for use in compiling the final event report. The Post Event After-Action reporting process is described in Appendix 12.

3. RESTORATION PHILOSOPHY AND ORGANIZATION

a. Corporate Restoration Philosophy

The goal of the restoration process is to safely restore electric service to the largest number of customers in a minimum amount of time, as efficiently as possible. Therefore, public safety issues are the highest priority followed by damage to substations, transmission lines, and major circuits / feeders. Power is then restored to groups of customers, and then individual homes and businesses.

Service restoration priorities may vary based upon the magnitude of the system damage, duration of the storm and field conditions. The general sequence of service restoration will be as follows:

First Priority – Immediate Life Threatening Situations, Public Health and Safety
- Public safety requires the de-energizing or cutting down of downed primary voltage distribution lines and clearing roads.
- Restoration of service to previously designated public emergency service institutions such as major hospitals, evacuation centers, as prioritized by municipal officials.
- After the storm has passed to allow for the safe operation of aerial devices (≤ to 30 mph), UI may establish city/town make safe crews (line and tree crews paired up) and have them muster with the municipal public works department or police / fire department representatives to cut clear all electrical conductors leaning on wires in order to open roadways.

Second Priority – Substations, Transmission Lines, Primary Distribution Feeders
- Service restoration to a maximum number of customers in a minimum amount of time using available work forces, usually involves the removal of trees and limbs (see above), bypassing some damaged equipment and re-energizing primary distribution lines. In some cases, circuit ownership may be established from the source to mainline. Then crews can then go back and work on the side taps. Crews could be paired up with tree trimmers to facilitate more rapid restoration.

Third Priority – Single and Three-Phase Laterals
- The repair and restoration of equipment and lines serving groups of customers.

Fourth Priority – Distribution Transformers and Services

- Although the restoration of service lines to individual homes or buildings is designated as Priority Four, in some cases these may be done at the same time as other higher priority work. This is accomplished by using UI crews not normally associated with distribution restoration work.

For outages expected to last several days due to extensive infrastructure damage, UI may move to a circuit based restoration process in order to facilitate coordination and increase customer restoration estimation accuracy.

Restoration efforts by field response personnel will not commence until safe conditions exist.

Effective, timely and accurate communications with internal and external stakeholder groups is a critical part of the restoration process. The Company strives to communicate timely, accurate and useful estimated restoration times to the public.
Timely and accurate restoration reports from all personnel in the field are an essential component of the emergency restoration process. Field personnel will provide detailed damage reports and estimated work time updates once they arrive on site, and will report completed jobs as soon as they are done.

Once the supply system has been returned to normal, feeders and equipment still out of service and customers previously dropped will be restored based on priorities established by System Operations.

Based upon the specific impact of a major storm event, the Company will determine the best method to recover to normal configuration. This may include the evaluation and implementation of new designs or the re-establishment of existing designs.

Based upon the impact of a major storm event, the Company may choose to decentralize into the four operating regions depicted below:
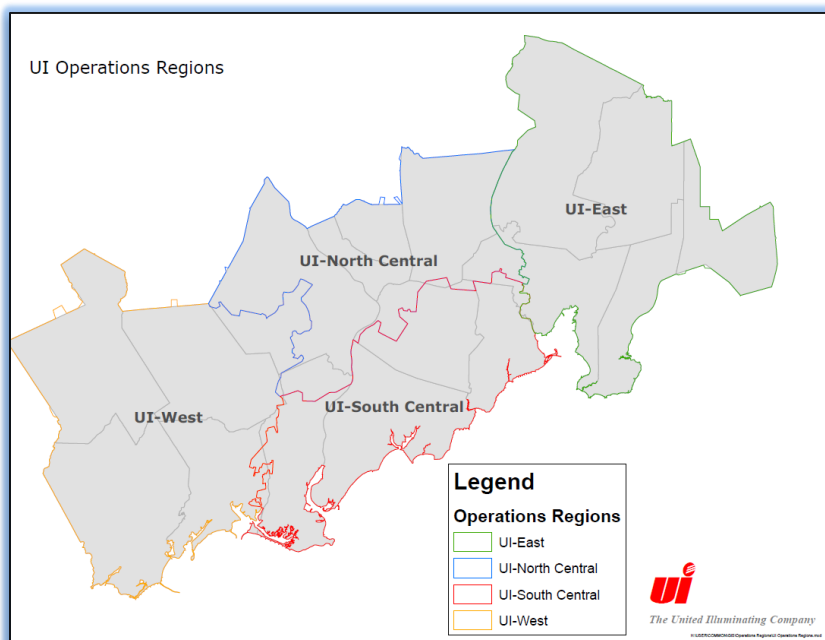
Post storm, depending upon the extent and type of system damage incurred, the Company may decide to patrol all or some percentage of the circuits for additional damage and identify locations of temporary repairs.

b. Organization

The ERP is based on the Incident Command System (ICS), which is a nationally recognized system for managing incidents. The ICS is the foundation of the National Incident Management System (NIMS) and the National Response Framework (NRF). The use of this system is required by government regulation for hazardous materials and environmental response incidents and is the form of response for federal, state and local first responders. This system provides a centralized management structure to enhance communication and coordination between decision-makers. It is also a requirement for utilities to operate under this system by CT PURA. The ICS organization is built around the major functions that are applied to any incident, whether large or small. The ICS provides the ability to utilize only those parts of the organization that are required to respond to the event or incident. ICS establishes lines of supervisory authority and formal reporting relationships and maintains a manageable span of control in each section of the organization.

The ERP develops in a modular fashion based on the nature and size of the emergency. This flexibility allows the Company to respond to incidents of any size and provides for efficient integration of diverse response activities. All or part of the ERP will be activated based on the severity, classification, and assessment of the incident. This is based upon the management, coordination and response needs for that incident.

ICS team members are part of a temporary management structure during the response efforts; they do not relinquish authority, responsibility or accountability unless relieved by the appropriate leader. Existing departmental organizations and reporting structures are modified to accomplish sustained incident response with support from the ERP.

Implementation of the UI ERP relies on pre-identified pools of employees that are available to support the business requirements of the company during an emergency. Employees will be pre-assigned incident response roles, also known as Emergency Storm Assignments. Exceptions are those employees whose Emergency Storm Assignments are also their primary job (example: line personnel). Emergency Storm Assignments may be pre-activated to match the needs of an event that provides advance warning. Depending on the scale of the event Avangrid Area Command may be initiated to assist in managing the event.

Organizational charts and position responsibilities for the Section Chief or Officer roles are found in Section 3.h of this plan. Position checklists are located in the respective Appendix sections. Position responsibilities for supporting positions within each of the functional areas are located in the appendices corresponding to each of these functional areas.

c. Interagency Coordination

The goal of coordinating with federal, state, county, telecommunications companies and local agencies within the service territory is to improve the effectiveness of coordination and partnership between all these groups in the event of a major event. Interagency coordination assists all stakeholder groups by establishing open and ongoing communications. This will require coordination with the State of Connecticut, the Public Utilities Regulatory Authority and representatives of the seventeen towns served. This process is described in the Connecticut Emergency Support Function #12—All Hazards Energy and Utilities Annex. This Annex describes the multi-agency coordination that will take place under the Connecticut State Response Framework, specific to the utility organizations, and can be reviewed at the following link:

http://www.ct.gov/demhs/lib/demhs/eppi/esf_12_all-
hazards_energy_and_utilities_annex_final_draft_july_2012.pdf

Contact information for each of these groups is maintained by the Liaison Team.

Professionalism between external stakeholder group employees and UI employees will be maintained at all times with a constant focus on maintaining a productive work environment. In order to ensure our employees safety, UI will take all necessary steps to address any verbal or physical threats. This could include removal of employees from the threatening environment until the issue is resolved. This is outlined in the Municipal Liaison Code of Conduct.

Coordination of efforts with the natural gas utilities following severe weather events will better align restoration activities to ensure the safety of customers who have both electric and natural gas service.

d. Communications

Emergency events dramatically increase the demand for both speed and volume in communications. During an emergency event, UI will utilize a structured approach to communicate with key stakeholders. The organizational structure is scalable to adapt to events of varying size. The plan provides guidelines to ensure timely communication and coordination between company subject matter experts and the various internal stakeholders and outside agencies to ensure that communications are relevant to the stakeholder audience.

The Public Information Appendix (Appendix 3) provides a comprehensive approach for communicating with customers, public officials, governmental entities, media, employees and other stakeholders. It includes multiple strategies and tactics with an understanding that it is as important to provide information during an emergency event as it is to respond to such an event.

Delivering messages to a broad range of audiences will be coordinated by the Public Information Officer and channeled through the approval processes to make sure that they are in line with the overall messages and approved by UI for release. Messages can be released through a variety of means and messengers and at various time frames, depending on the level of the emergency. Consideration is given to the 24-hour news cycle, which informs customers, regulators and public officials. See Appendix 3 – Public Information, for the chart which is also included as Attachment 1 to this document showing the method and timing of communications messages.

One individual will be designated as the primary spokesperson to represent the Company, make official statements and answer media questions throughout the crisis. A back-up to the designated spokesperson will be identified to fill the position in the event that the primary spokesperson is unavailable. Individuals who may serve as technical experts or advisors will be designated depending upon the nature of the crisis.

In addition to the UI designated spokespeople and experts, other parties involved in the emergency will likely have a spokesperson (police, fire department, health officials, etc.) It's important to identify those individuals as soon as possible to coordinate statements and contacts with the media.

Depending upon the type of event, a Joint Information Center (JIC) may be established, and the Public Information Officer, or their designee, may be called upon to participate in the JIC.

e. Overall Incident Management Organization

```
                          Executive Team
                          Labor Relations
                        
  Legal Counsel                                    Joint Information Center
                                                          (Process)

                          Incident Commander
                                                    Documentation
                                                    Coordinator

                                                    Safety Officer

Deputy Incident    Operations Section   Planning Section   Logistics Section   Finance Section
   Commander            Chief               Chief              Chief              Chief
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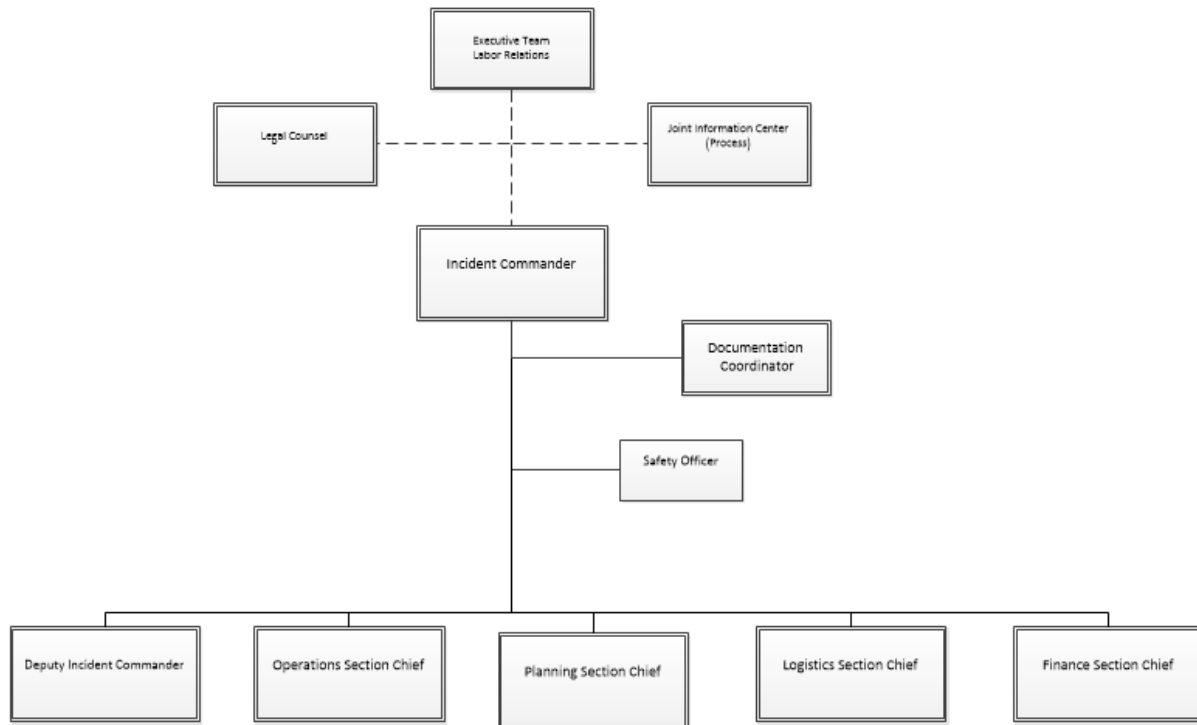
UI Incident Management Organizational Structure

f. Staffing

Personnel have been pre-assigned to specific Incident Management Team organization positions. This assignment list is maintained by the UI Emergency Management group.

g. Locations

A number of company locations may be activated to support and coordinate emergency response efforts by the multiple organizations involved during various levels of emergencies. A list of these locations in located in Section 2.f.

h. Roles and Responsibilities

Incident Commander
- Responsible for the overall management of the incident response. Conducts pre-event updates and initiates pre-event meetings and/or conference calls. Determines the need for activation of the UI Emergency Operations Center (UI EOC) and the initial reporting incident management team structure. They determine incident objectives and strategies and conducts ongoing restoration strategy meetings and briefings. He/she monitors the operating response and approves requests for additional resources or for their release consistent with the specific needs of the situation. He/she is responsible to approve the Incident action plan for a level 3 and above event unless otherwise requested then forward copy to PURA on a daily basis.
- The Incident Management Team consists of the members outlined in Figure below.
- Job descriptions, position checklists, forms and resources for the Incident Commander and his/her support personnel are located in Appendix 2 – Incident Commander.

    a. Safety Officer

      ° The Safety Officer is responsible for coordination and monitoring of employee and contractor safety. Coordinates safety needs with each operating team. Conducts training on technical, safety and operational skills. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.

    b. Documentation Coordinator
      ° The Documentation Coordinator is responsible for the organization and dissemination of all storm related

documents and the creation of storm advisories and IMT meeting minutes.
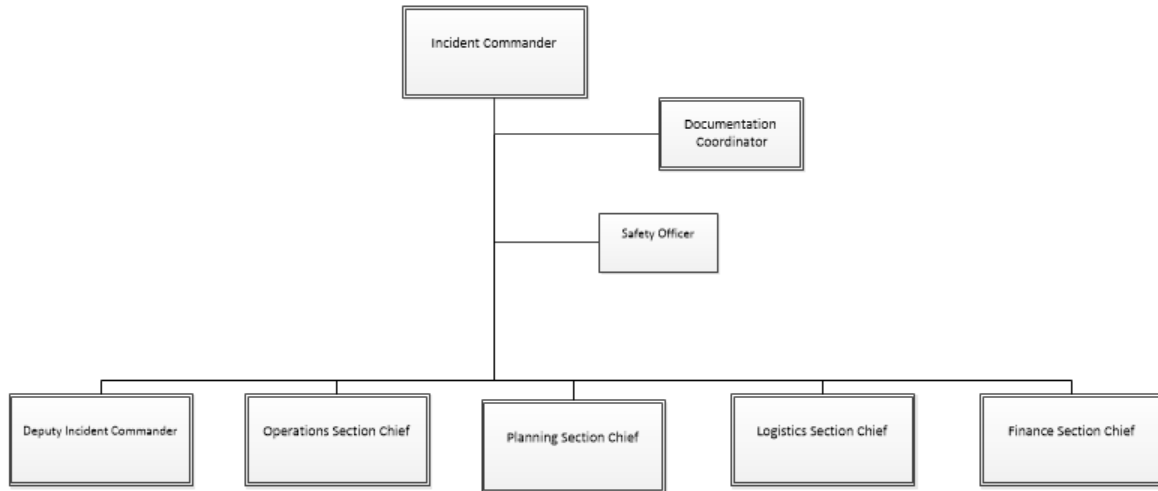
Incident Management Team

Deputy Incident Commander

- Responsible for overall management of internal, customer, and municipal communications, information technology, and customer needs
- The Deputy Incident Command team structure is summarized in Figure below.
- Job descriptions, position checklists, forms, and resources are also located in Appendix 3 – Deputy Incident Command
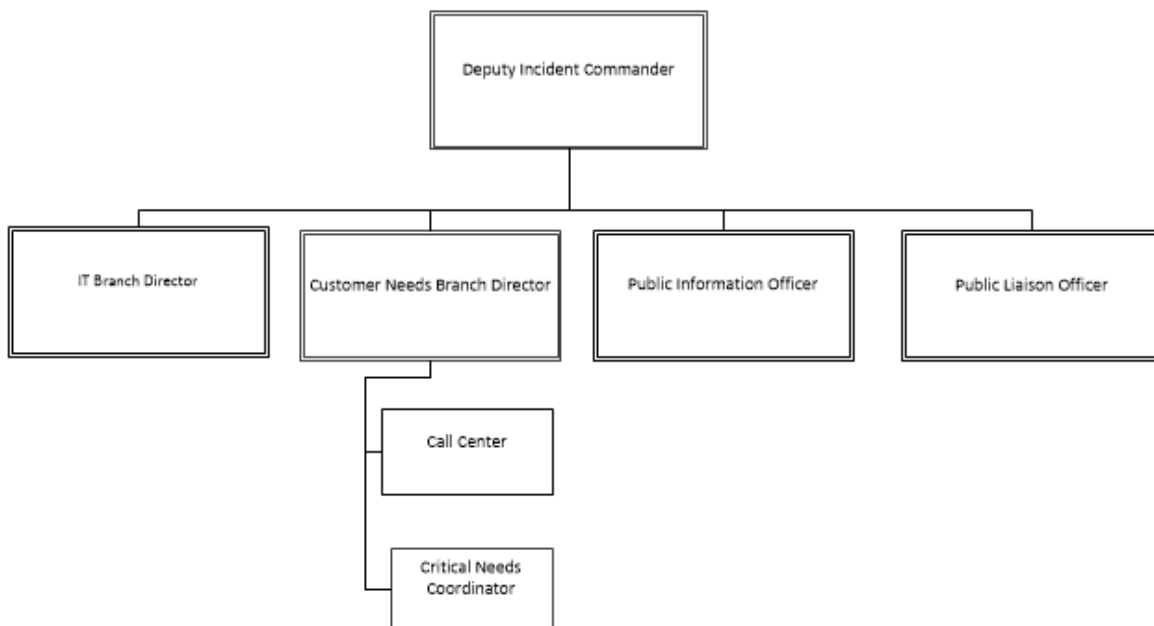
Deputy Incident Commander Team

Public Information Officer

- The Public Information Officer is the clearinghouse for all communications – internal and external. Responsible for media management for the storm restoration incident, develops statements to the media and external publics, conducts interviews with the media, and oversees all employee communication efforts. Provides talking points to internal stakeholder groups. Coordinates approval of all communication messages. Coordinates field filming, interviews and briefings. Informs media and conducts media briefings. Develops material for use in media briefings. Coordinates communication needs with each operating area, as appropriate. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.
- The Public Information Team organizational structure is summarized in Figure below.
- The Public Information Officer will be supported by the members outlined in Appendix 3 – Public Information.
- Job descriptions, position checklists, forms and resources are also located in Appendix 3 – Public Information.

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                    ┌─────────────────────────┐
                    │ Public Information Officer│
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                                 │
     ┌───────────────┬───────────┴───────────┬───────────────┐
┌─────────────┐ ┌─────────────┐ ┌─────────────┐ ┌──────────────────────┐
│  Investor   │ │ Information  │ │Internal/    │ │Assistant Public      │
│ Relations   │ │ Support      │ │External     │ │Information            │
│Representative│ │ Specialist  │ │Communications│ │Leader               │
└─────────────┘ └─────────────┘ └─────────────┘ └──────────────────────┘
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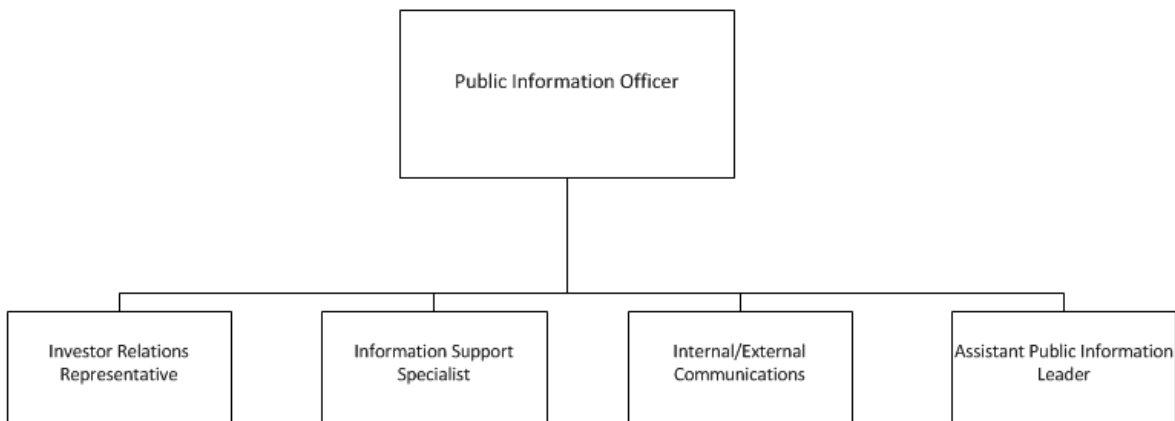
Public Information Team Overview

Public Liaison Officer

- Responsible for all activities that involve communication and coordination with external municipalities and agencies. Represent UI with the PURA and at the State EOC. Manage relationships between external agencies (federal, state and local) and UI. Represent UI with municipalities and process municipal requests. Maintains an awareness of active and developing situations that require communication with outside agencies. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.
- The Public Liaison Officer will be supported by the members outlined in Appendix 4 – Liaison.
- Job descriptions, position checklists, forms and resources are also located in Appendix 4 - Liaison.

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                        ┌─────────────────────────┐
                        │  Public Liaison Officer  │
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┌──────────────┐ ┌──────────────┐ ┌──────────────┐ ┌──────────────┐
│ State EOC     │ │ PURA         │ │ Major Account│ │ Municipal    │
│ Liaison Team  │ │ Representative│ │ Coordinator  │ │ Liaison Team │
│ Coordinator   │ │              │ │              │ │ Coordinator  │
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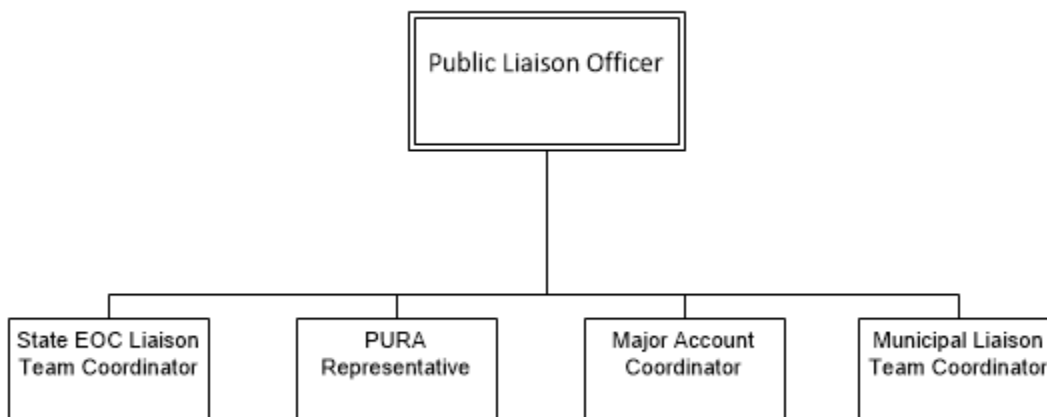
Public Liaison Officer Overview

IT Branch Director

- ▪ Responsible for coordinating all IT and Telecommunications support during the incident response and outage restoration efforts. Provides and maintains SCADA, telephone and radio systems. Provides critical IT operations and applications, support resources and personnel. Maintains OMS application and all associated and interfaced applications and technology. Ensure that all key system vendors are notified of the impending event, and are staffed appropriately to support UI on a 24x7 basis. Recommends scale up or scale down of incident management structure for the IT and Telecom team when conditions warrant. Ensures that the IT and Telecommunications positions are fully staffed with qualified individuals. Ensures that the roles and responsibilities of each individual are defined and communicated. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.
- ▪ The IT and Telecom Team organizational structure is summarized in Figure below.
- ▪ The IT Section Chief will be supported by the members outlined in Appendix 5 – IT and Telecom.
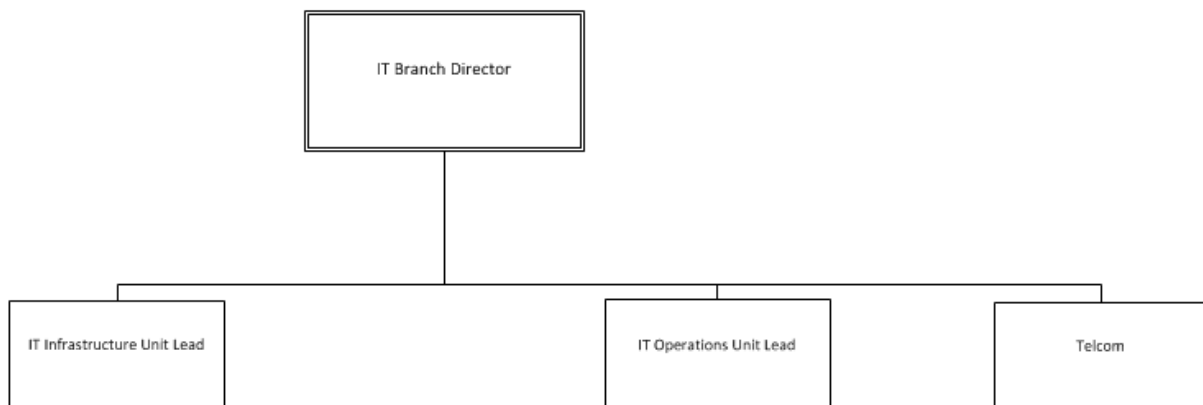- ▪ Job descriptions, position checklists, forms and resources are also located in Appendix 5 – IT and Telecom.

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                    ┌─────────────────────┐
                    │  IT Branch Director  │
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                              │
        ┌─────────────────────┼─────────────────────┐
┌──────────────────┐  ┌──────────────────┐  ┌──────────────────┐
│ IT Infrastructure │  │  IT Operations   │  │      Telcom      │
│    Unit Lead      │  │    Unit Lead     │  │                  │
└──────────────────┘  └──────────────────┘  └──────────────────┘
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IT Overview

Operation's Section Chief

- Responsible for directing and coordinating all tactical operations associated with electric system restoration. Responsible to ensure that the dispatch and management of field resources is done in order to accomplish the electric system restoration. Responsible for managing the police and fire calls, wire down response and ensuring that the customer care center is staffed appropriately. Assesses the effect of emergency operations on non-emergency work assignments and any other long-term effects on operations. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.
- The Operations Team organizational structure is summarized in Figure below.
- The Operations Team Leader will be supported by the members outlined in Appendix 9 – Operations.
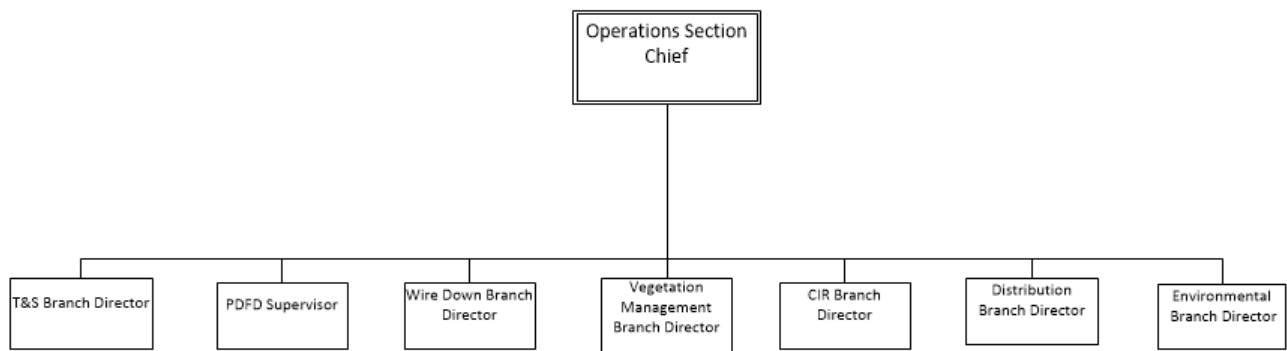- Job descriptions, position checklists, forms and resources are also located in Appendix 9 - Operations.


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                        ┌──────────────────┐
                        │ Operations Section│
                        │      Chief        │
                        └──────────────────┘
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| T&S Branch Director | PDFD Supervisor | Wire Down Branch Director | Vegetation Management Branch Director | CIR Branch Director | Distribution Branch Director | Environmental Branch Director |

Operations Team Overview

Planning Section Chief
- Responsible for analyzing and prioritizing restoration efforts. Works closely with the incident management team members to assess the level of effort needed to restore customers and develop appropriate plans. Responsible for the preparation of the overall incident response plan. Estimates resource needs and develops projections. Provides estimated time for restoration, and a glide path for restoration efforts on an on-going basis throughout the duration of the event. Collects, analyzes and displays incident information. Coordinates the damage assessment process. Determines resource allocation for damage assessment resources and determines resource needs for field personnel staffing assignments. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains an activity log.
- The Planning Team organizational structure is summarized in Figure below.
- The Planning Section Chief will be supported by the members outlined in Appendix 7 – Planning.
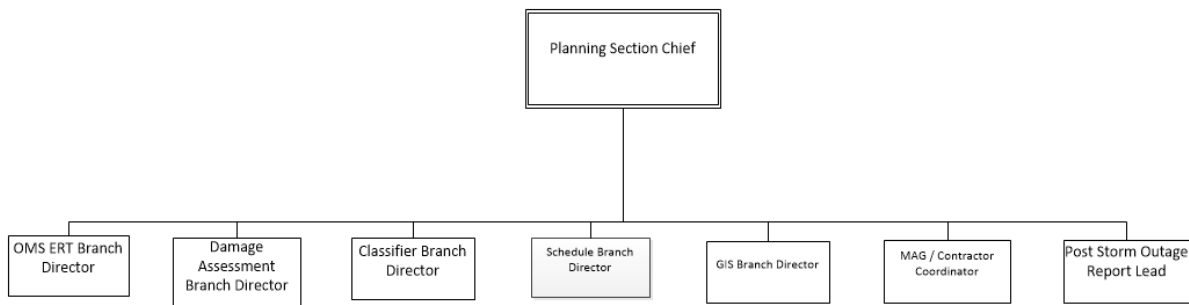- Job descriptions, position checklists, forms and resources are also located in Appendix 7 - Planning.
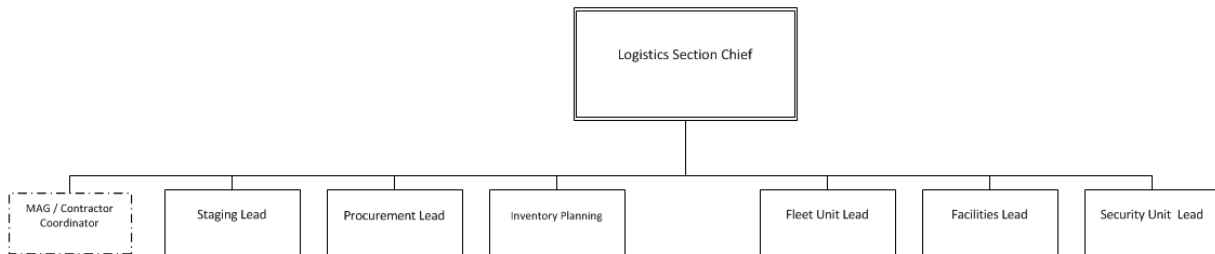

Planning Team Overview

Logistics Section Chief

- Responsible for all aspects of logistical support including the management and delivery of materials, the acquisition of materials, services, vehicle and fleet support, temporary lodging and facilities support. Coordinates food for all resources, internal and external. Monitors, identifies and develops plans to deal with facility and security related issues associated with the emergency. Develops plans for the protection and continued ability to operate company facilities. Activates the establishment of Staging Areas (as required). Activates emergency contracts with vendors if required. Coordinates and processes requests for additional materials, support service and contractor resources. Evaluates emergency site security and oversees emergency transportation issues. Monitors and reviews emergency material usage with Incident Commander. Arranges for emergency employee housing as required. Serves as coordinator for emergency material needs with vendors, outside utilities, etc. Arranges for housing and vehicle support for mutual assistance resources. Arranges for vehicle support for auxiliary incident processes. Ensures that all action plans and checklists are complete and updated. Maintains an activity log.
- The Logistics Team organizational structure is summarized in Figure below.
- The Logistics Team Leader will be supported by the members outlined in Appendix 10 – Logistics.
- Job descriptions, position checklists, forms and resources are also located in Appendix 10 - Logistics.
-

Logistics Team Overview

Finance Section Chief

- Responsible for all aspects of financial support including the management of accounting procedures and policies, emergency fund disbursement, and administrative support. Responsible for providing financial information (i.e. storm cost projections) to incident management team members, as requested. Ensure proper invoicing by vendors until payment authorization is finalized. Establishes emergency accounting procedures as required. Coordinates emergency funds, including petty cash requirements. Coordinates insurance issues with the company insurance claim representative as required. Ensures accurate and timely accounting for storm restoration expenses. Communicates any changes in company policy that affect emergency accounting procedures. Ensures that all action plans and checklists are complete and updated. Provides status information for briefings. Maintains and activity log.
- The Finance Team organizational structure is summarized in Figure below.
- The Finance Section Chief will be supported by the members outlined in Appendix 8 – Finance.
- Job descriptions, position checklists, forms and resources are also located in Appendix 8 – Finance.

Finance Team Overview
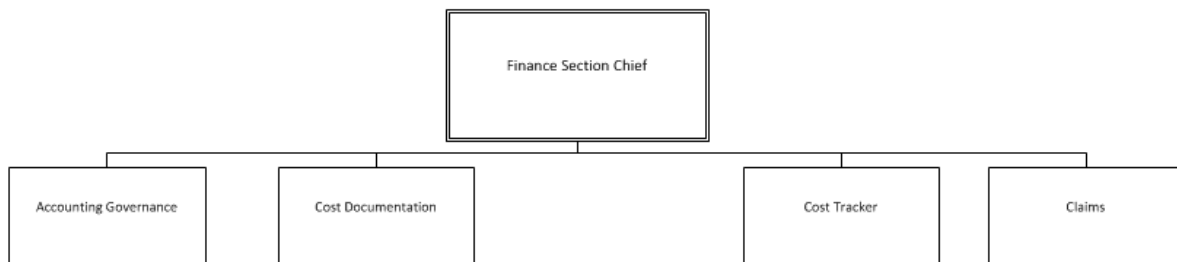
4. COMPLIANCE

a. Emergency Response and Restoration Training

The implementation of the ERP requires in many instances that employees shift from their normal business activities to assume a different set of roles and responsibilities. Leadership recognizes that employees need to receive training and opportunities to practice to perform these activities in a safe and effective manner.

b. Internal Training Program

Trained personnel are essential for successful execution of restoration duties. Since incident restoration involves personnel performing tasks that may be different from their normal jobs, training will be conducted annually. This training can take the form of attending a class, participating in an exercise and/or review of associated job aids. Training should be coordinated with the review of Emergency Storm Assignments to ensure that all the required positions have enough adequately trained personnel.

The three essentials of effective training are:

1. Job Task Analysis: The skills, knowledge and procedures required for satisfactory job performance.
2. Instruction: Lectures, simulation, drills or team training.
3. Performance Evaluation: Training effectiveness is evaluated based on performance during an incident. Revisions and/or enhancements to the training program will be incorporated as needed based upon feedback from actual performance.

Additional training requirements may be identified as a result of debriefings following an actual emergency event or exercises / drills. Where appropriate, training is to include a review of systems and software used during incident response activities (OMS, GIS, AVL, AMR, etc.). Training may also include safety, technical and process training refreshers.

The Manager of Operational Readiness, is responsible for developing and maintaining the ongoing training program related to the ERP roles, responsibilities and procedures to ensure that emergency response procedures are well understood. Training records will be turned over to the Avangrid Human Resources Department for tracking and compliance purposes.

c. External Training Program

UI will respond to and provide training to any municipal and/or state EOC / first responder group upon request. Annually, the Liaison Team will conduct a presentation for municipalities that will include the following; an overview of the ERP, the wires down process, substation safety and the restoration priorities.

    d. Exercises and Drills

Exercises and drills are designed to promote emergency preparedness; test and/or evaluate restoration operations, policies, or procedures; and train personnel for secondary duties. Exercises are used to review and evaluate operations of the overall ERP and interactions between internal and external entities. Drills are used to support training and to test response capabilities of specific components. Exercises and drills are conducted to review emergency plans, roles and responsibilities, communications methods, lines of authority, training success and to resolve any issues of coordination.

The Facilities Department, in conjunction with the Manager of Operational Readiness, will conduct an annual full load test of all emergency power to ensure that the auxiliary power generators are functioning properly and that designated computers, printers and communications equipment in the UI EOC function correctly on auxiliary power. Facilities will also verify the auxiliary generator full load running times, fuel supplies and source locations.

The Manager of Operational Readiness will be responsible for scheduling, conducting and evaluating an exercise relative to this plan. It is important that all participants take part in restoration exercises and drills to become familiar with their duties. The nature and extent of drills is determined by the feedback from training and post event evaluations. Also, UI will participate in training exercises as directed by the Commissioner of Emergency Services and Public Protection.

UI will conduct an exercise using the procedures set forth in this ERP. If UI uses the plan during such 12 month period in responding to an actual emergency event, then UI will have the option to complete an exercise within 18 months. The exercise evaluation will be provided to the PURA within 60 days after the exercise.

UI will provide no less than ten days prior notice of its annual exercise to the PURA, the Department of Emergency Services and Public Protection, the chief elected official of each municipality in its service territory, any state-established emergency office(s) for the region(s) in which the exercise is to be performed, and to appropriate local authorities.

Every three calendar years, UI will conduct or participate in a comprehensive emergency exercise to test and evaluate major components of its plan. This large-scale exercise should consider the highest level event covered in the ERP, with a high percentage of its customers suffering an extended outage. UI will invite a cross-section of the following, or their representatives, located within the UI's service territory, to the exercise:
- Chief elected official and other elected officials
- County/regional emergency management directors
- Fire and police departments
- Community organizations such as the American Red Cross
- Other organizations, as appropriate

- PURA
    e. PURA Requirements

The ERP will conform to the guidance set forth in the Connecticut Emergency Support Function #12—All Hazards Energy and Utilities Annex. This Annex describes the multi-agency coordination

that will take place under the Connecticut State Response Framework, specific to the utility organizations.

UI operates a 24/7 operation, and as such, personnel can be reached at all times.

UI will notify the PURA of the mutual aid groups to which it belongs and whether there have been changes in the membership of those groups or material changes in the rules of those groups within the previous 12 months. This will be done annually by July 1st.

    f. Communication Success Measures

Within the ERP and its appendices, UI sets expectations to communicate key storm restoration information to designated government entities on the State and local municipal level on a frequent and regular basis. The communication actions are integrated throughout the ERP, with external communication to a predetermined list of State and local agencies discussed in Section 3.d Communications, 3.h.vi Public Information and 3.h.vii Liaison. Section 5.c. Pre-event Communications Preparedness UI believes the best measure of success is to fulfill these commitments as described.

    g. Post Event Reports and Critiques

Post event evaluations contribute to continuous ERP improvements. Response activities are most likely to improve when feedback recommendations are linked and incorporated into the plan and departmental support procedures.

Upon declaration that the emergency recovery is over, and as soon as practical, a post-emergency debrief meeting will be conducted by the Restoration Team or designee to identify lessons learned from the event. Each area of the Incident Management organization is also responsible for conducting a post-incident performance review of their area of responsibility. This review should assess response activities and opportunities for improvement.

A combined After-Action Review (AAR) Report will be generated from the finalized notes of the debrief meeting and the input from each responsible area by the Restoration Team. This should be accomplished within sixty days after the conclusion of the event.

The AAR Report will include the following:

- Identify potential plan and procedure modifications to the ERP, as necessary.

- Discuss the successes and lessons learned.
- Assign responsibility for follow up activities that were not immediately addressed.

The AAR report should address strengths, opportunities, trends, lessons learned and recommendations, as well as any significant action items assigned, including a timeline for completion. A sample After-Action Report table of contents is located in Appendix 12 – Post Event Activities and After-Action Reporting

The Manager of Operational Readiness is responsible for ensuring that these post-event critiques are completed, and that the ERP is updated as appropriate.

UI uses the $1 million expense threshold based on PURA's definition adopted from the Final Decision dated August 14, 2013, in Docket 13-01-19, to determine when the Company may seek recovery of extraordinary expenses.

UI will continue to utilize the 98.5 percentile methodology for the reporting of reliability statistics. When the number of restoration steps exceeds 98.5 percentile of all days in the most recent four years, all reliability data associated with interruptions beginning on that qualifying day would be excluded, even if the interruptions extend into subsequent days.

SECTION 2 - OPERATING GUIDELINES

5. PRE-EVENT

UI recognizes that a successful restoration and recovery process does not begin when the event passes – it starts well before during pre-event preparations, without appropriate pre-event preparations perhaps resulting in inefficient restoration.
Detailed pre-event activities organized by functional area of responsibility are located in the respective section of the Appendix. This section of the plan provides a general overview of the activities that are typically performed.

      a. Pre-Event Preparations

Advance notification of severe weather often provides enough time to conduct pre-incident preparations. In pre-incident preparation, UI will evaluate the projected severity of the incident in order to classify the storm response per the event level matrix, estimate potential damage, and determine required restoration resources. During this time, the incident has not impacted the electric system, but is likely to.

Pre-event preparations will be incorporated into the emergency response and restoration operations at every level of the organization. Appropriate proactive measures will be taken when identified triggers have been met or at the direction of the appropriate functional leadership as discussed in the ERP.

Some of the specific activities may include:
- Initial determination of the event level
- Initial Incident Management Team personnel activation levels
- Initial resource (personnel) requirements
- Activation notification to required personnel
- Identifying and staging required materials
- Communicating pre-incident plans to all appropriate parties
- Activation of NERC CIP compliant personnel who have an assignment that requires access to the System Operations Center.

Pre-event preparation may include pre-planning conference calls to review the status of preparations. These calls will be coordinated by the Manager of Operational Readiness or their designee.

Some incidents, such as a Nor'easter or tropical storm, will allow for advance outage restoration preparation. In cases where several days advance warning is possible, Pending Incident Preparation Checklists will be followed to ensure that UI is at the highest level of preparedness. These lists are developed considering Levels 5 Minor, 5 Moderate 4, 3, 2, 1A & 1 events. For these types of events, employee emergency storm assignments will be activated in advance.

Incidents such as approaching severe thunderstorms allow for some limited preparation because the extent of the damage can't be predicted with any certainty. Other weather conditions that may fit in this category include freezing rain, ice, or exceptionally cold or hot weather. This type of pending incident typically allows for less than 24 hours' notice and would normally be a Level 4 or 5 event. Actions that can be taken for this type of event include:

- Increase or delay the release of employees
- Review incident preparation list for number of staff needed
- Mobilize specific resources in advance, if warranted

Upon the internal announcement for areas to start preparing for a pending incident, an accountability process will be implemented to ensure compliance with the request. The Incident Commander (if already activated) will review the Pending Incident Preparation Checklist (located in Appendix 2) and ensure that the appropriate portion of the list has been completed (i.e. 96 hours prior to potential event portion). Any exceptions (items not completed) will be noted with the reason for the exception(s) and other specific actions being taken. Completion of these pre-event activities will continue until an incident occurs or the threat of the pending incident passes.

b. Weather Forecasts

Western Connecticut State University, DTN, ATMOS & the University of Connecticut's Outage Prediction Model provides regional forecasts provides for System Operations and the Manager of Operational Readiness. These updates contain temperature, wind (sustained and gust) directions and speed. Precipitation and a general weather description for a time period are also provided. The weather forecaster will also make note of any significant weather if it is expected. Publicly available weather information is also used to provide further validation.

The weather forecast is tracked for alerts. An email notification is issued internally to a predefined distribution list. A conference call or meeting will be conducted between the Restoration Team and Incident Management Team Leaders to determine a course of action. If appropriate, crews can be pre-staged, and trucks stocked.

c. Communications Preparedness

A well-informed and prepared customer population is better able to prepare for and cope with a severe storm or other emergency event and to understand UI's preparations and restoration efforts. At appropriate advance trigger points, the Public Information staff will contact all media outlets to remind them of appropriate UI information channels, phone numbers and contacts. Public Information (JIC if activated) will prepare and package practical consumer advice in print, audio, video and internet media formats. This packaged information will be available for release at appropriate trigger points (72 hours, 48 hours, 24 hours) depending on the severity of the expected storm and the duration of advance notice. Public Information will pro-actively offer to the

media "live" interviews with UI executives to demonstrate and signify the Company's sincere concern for its customers, as well as its expertise and preparedness for restoration.

Communication requirements for internal as well as external groups are identified in advance, planned for, and monitored for effectiveness during the restoration process. Accurate, timely and coordinated communications provide a vital link in the restoration response. Operational communications help coordinate field restoration activities. Conveying information regarding field activities to employees, executives, customers, and government agencies represents informational communications.

d. Internal Briefings / Conference Calls

Pre-event conference calls using the number specified by Incident Commander will be conducted according to the schedule identified in the ERP. These calls will provide an opportunity to communicate preparation status reports, identify resource needs, provide directives and outline the communications plans.

The Incident Commander or their designee will contact the predefined primary and secondary contacts for each group of support personnel, informing them of the time and number for a conference call to determine staffing requirements for the predicted event. The primary or secondary contact will then be responsible for mobilization of their respective support functions. The leaders of each team will determine staffing to accommodate the initial activation.

The conference calls are initiated and run by the Incident Commander. The minutes from the conference call are prepared by a member of the staff or assigned resource and distributed to participants within two hours after the call. Calls will be conducted using the Conference Call Agenda located in Appendix 2.

The following guidelines should be followed in order to conduct an effective and efficient conference call.

- Participants should call in several minutes before the call is scheduled to start.
- Calls should be made from a quiet location.
- Participants should mute their phone to minimize background noise. Un-mute phone only when speaking.
- Participants should not put the conference call on hold.
- Participants should not engage in side conversations or take phone calls while on the conference call.
- If several participants are located in the same building, they should meet in an office or conference room and call together, when social distancing is not required.
- When using a speaker phone, participants should sit close to the microphone and speak up.

- Participants should always identify themselves before they speak and stay on topic.
- Any reports provided should be succinct and to the point.
- Generic statements such as "we will continue to support" do not need to be reported on the call.
- Do not attempt to work issues on the conference call.
- If there is an issue that requires additional discussion from only a few of the conference call participants, an announcement should be made notifying participants that you will be taking up that discussion at the end of the call. When the end of the agenda has been reached, the balance of the participants can be released from the call to continue with the outstanding issues.
- Initiator of call will control the conference call.

e. Pre-Staging Resources

When appropriate based upon the predicted nature and severity of the event, crews and/or equipment may be pre-staged in areas expected to be most severely impacted. Local staging areas have been identified, and a plan for activating staging areas is the responsibility of the Logistics Team. The plan may also be activated in advance of the event should conditions warrant it.

f. Mutual Assistance / External Resources

When events occur (or are predicted to occur) within the UI service territory it may become necessary to augment internal resources with mutual aid or contractor resources. An Event Level 5 typically requires less than 24 hours to restore customers and does not generally require the aid of external resources. Event Level 5 may require the use of external resources, while Levels 4 through 1 will require a significant amount of outside assistance. UI will notify the Connecticut Public Utility Regulatory Authority of its strategy to solicit for mutual assistance resources.

When a significant weather event is forecasted to have a wide-spread regional impact, procurement of external resources may need to be done well in advance of the onset of the event. During this phase the Manager of Operational Readiness or his or her designee will participate in appropriate regional utility mutual assistance group conference calls to discuss resource availability and needs. The Edison Electric Institute (EEI) maintains a mutual assistance roster of major electric utilities and utility contractors in the United States, and appropriate EEI contractual arrangements will be utilized. UI is also a member of the North Atlantic Mutual Assistance Group (NAMAG).

In the event that additional contractor personnel are required beyond the level that companies currently working with UI can provide, the Incident Commander will request that the MAG Contract Coordinator contact qualified contractor firms and make the necessary arrangements to procure their services.

UI will follow the Incident Command System guidelines in the deployment of additional resources. An appropriate span of control will be maintained to ensure that personnel safety is ensured and that personnel are managed properly.

Mutual assistance personnel will be assigned based upon the same priorities as the internal crews. These priorities are described in Section 3.a, Corporate Restoration Philosophy.

g. Restoration Planning

The ERP outlines the planning and coordination issues. The Incident Management Team will confer to determine if any modification of previously agreed to restoration activities need be made and will then confer with their respective direct reports.

Pre-event restoration planning includes a process review to ensure readiness for:
- Event record keeping
- Activity logs
- Expenditure tracking
- Personnel readiness
- Material needs, fleet and lodging
- Resource needs

h. Response and Restoration Criteria

Utilizing available information and judgment, resources will be allocated to support established restoration priorities and recovery objectives outlined in Section 3 of the ERP. These priorities may be re-evaluated during the event to ensure optimal resource allocation, and are as follows:
- Make safe/road clearing, a line construction crew and a tree crew will be assigned to each municipality upon the municipality opening their EOC and requesting a municipal road clearing crew. This follows the guidance set forth within the State of Connecticut's ESF-12 annex.
- Assess damage
- Restore pre-identified critical municipal priorities
- Communicate in a timely and accurate manner, internally and externally (i.e. storm assessment, safety, restoration progress, etc.)
- Restore / repair

i. Prioritizing Guidelines

The overall objective of restoration is to safely restore customer service as quickly as possible while utilizing resources safely and efficiently. It is also to protect the integrity of the electric system. The highest priority is given to situations considered to be potentially life threatening such as assisting fire and police, responding to live wires down, and public health and safety facilities without service.

The Incident Management Team will confer on staffing priorities and allocate resources based on the restoration priorities. While some restoration will occur in parallel, depending on the available number of trained employees, there may be a need to assign resources to safety issues and damage assessment before restoration.

j. Storm Cost Allocation

The company will follow UI Operating Procedure OP-G61 Electric System Major Storm Accounting Procedure to properly identify and collect costs associated with major storms.

6. ACTIVATION AND INCIDENT LEVEL CLASSIFICATION

In order to facilitate communication and response efforts, it is effective to categorize incidents into levels. By assigning an incident a level, response personnel will immediately have an understanding of the severity of an event and be able to respond in an appropriate manner. Departments and areas within UI will know their expected response based on the incident level. Events are classified into six levels, and these are described in Figure 6.1. A minor and moderate level has also been defined.

Activation levels are governed by several factors, the predicted weather, incident severity, electric system damage, outages reported, resource requirements and the restoration strategy. The Manager of Operational Readiness determines the initial activation level. Once the Incident Management Team is activated and during the incident, the Incident Commander assumes responsibility to evaluate the situation and determine the appropriate level of staffing for the supporting organizations. The implementation of the Emergency Response Plan is then the responsibility of the Incident Commander.

After notification of a system incident and once it has been determined that there will be a need for mobilization of emergency storm response support personnel, the Incident Commander or his designee will contact the predefined primary and secondary contacts for each Section Chief or Officer group, informing them of the time and number for a conference call to determine staffing requirements for the predicted weather event. Each Section Chief or Officer will then be responsible for mobilization of their respective support functions. Staffing to accommodate the initial activation is determined by the leaders of each team using the Staffing Levels by Event Level chart contained in their respective appendix.

Through consultation with Section Chief or Officer, the Incident Commander will continuously monitor the Incident Management organization. He/she monitors the changes from one incident level to another and is responsible for assessing the impact of the incident level. Extended restoration during Level 5, 4, 3, 2, 1A, & 1 incidents will require the activation of the UI EOC.

a. Event Level Classifications

The event level is determined based upon the criteria described in Figure 6.1 below. Any single parameter does not establish the event level. Rather it is a combination of Category values, used in conjunction with additional incident information that determines the appropriate level of response. The Matrix estimates are based on historical events and outcomes/results may vary depending on actual resource availability and extent of sustained damage.

PARAMETER	EVENT LEVEL CLASSIFICATION							
	5 MINOR	5 MODERATE	5	4	3	2	1A	1
CUSTOMER OUTAGES	≤5,000	>5,000 - ≤10,000	>10,000 - <31,356	≥31,356- <95,799	≥95,800- ≤159,967	>159,967- ≤223,549	>223,549 - 287,421	>287,421
PERCENTAGE OF CUSTOMERS AFFECTED*	Up to 1.5%	≥ 1.5% - < 3%	≥ 3% - < 10%	≥10% - <30%	≥30% - <50%	≥50% - <70%	≥70% - < 90%	≥90% - 100%
FEEDER / CIRCUIT LOCKOUTS	-	Up to 5	>5	>10	>25	>50	>100	>200
OMS OUTAGE ORDERS	-	≥25 - <50	≥50 - <75	≥75 - <400	≥400 - <1,000	≥1,000 - <2,000	≥2,000 - <3,000	≥3,000
TROUBLE ORDERS (PARTIAL SERVICE / NON-OUTAGE ORDERS)	-	≥50	≥75 - <100	≥100 - <500	≥500 - <1,000	≥500 - <1,000	≥1,000 - <2,500	≥2,500
WIRE DOWN ORDERS	-	≥25	≥50 - <75	≥75 - <100	≥100 - <250	≥250 - <700	≥700 - <1,500	≥1,500
GLOBAL ESTIMATED RESTORATION TIME	<12 hrs.	≥12 hrs. - <24 hrs.	≥24 hrs. - <48 hrs.	>2 days – <5 days	≥5 - <7 days	≥7 - <9 days	≥9 - <14 days	≥14 days
SUBSTATION PROBLEMS	-	1	1	2	3	≥4 - <10	≥10 - <14	≥14

*Percent of customers affected is based on the total number of customers and corresponds to the percentage levels of 10, 30, 50, and 70 as defined in Public Act 12-148.

**Global Estimated Restoration Time is based on historical data and prior to completion of field verified damage assessments.

Figure 6.1 – Event Level Classifications

b. Event Level Weather Predictors

Typical event level weather predictors describe the event level that might be expected given the type of weather described in the table below. Any single weather indicator does not establish the event level. Actual damage, used in conjunction with additional incident information, will determine the appropriate level of response. Weather forecast information can be used as a guideline to predict an anticipated level of damage, but the actual damage caused by a weather event will determine the appropriate level of response.

WEATHER PREDICTORS	EVENT LEVEL							
	5 MINOR	5 MODERATE	5	4	3	2	1A	1
Rain and Wind with Foliage								
Sustained winds (mph)	-	25-35	35-45	40-50	40-50	-	-	-
Wind gusts (mph)	-	>40	>50	>50	>60	-	-	-
Rain (inches)	-	>1	>1	>1	>1	-	-	-
Thunderstorm								
Sustained winds (mph)	-	25-35	35-45	40-50	40-50	-	-	-
Wind gusts (mph)	-	>40	>50	>50	>60	-	-	-
Rain (inches)	-	>1	>1	>1	>1	-	-	-
DAX Index	-	>2000	>2500	>3000	>3000	-	-	-
Derecho								
Sustained winds (mph)	-	-	-	-	-	50-75	75-95	-
Wind gusts (mph)	-	-	-	-	-	>80	>100	-
Rain (inches)	-	-	-	-	-	>1	>1	-
DAX Index	-	-	-	-	-	>3000	>4000	-
Heat								
Days > 90 Degrees	3	4	5	-	-	-	-	-
Tornado								
Fujitsu Scale	-	-	-	1	2	>3	-	-
Tropical								
Sustained winds (mph)	-	-	-	-	39-49	50 -73	-	-
Wind gusts (mph)	-	-	-	-	45-55	56-85	-	-
Rain (inches)	-	-	-	-	2 to 4	2 to 4	-	-
Storm Surge	-	-	-	-	-	2 ft -to 4 ft	-	-
Hurricane Cat 1								
Sustained winds (mph)	-	-	-	-	-	-	74-95	-
Wind gusts (mph)	-	-	-	-	-	-	>100	-

WEATHER PREDICTORS	EVENT LEVEL							
	5 MINOR	5 MODERATE	5	4	3	2	1A	1
Rain (inches)	-	-	-	-	-	-	2 to 14	-
Storm Surge	-	-	-	-	-	-	4 ft to 6 ft	-
Hurricane Cat 2								
Sustained winds (mph)	-	-	-	-	-	-	-	96-110
Wind gusts (mph)	-	-	-	-	-	-	-	>110
Rain (inches)	-	-	-	-	-	-	-	2 to 14
Storm Surge	-	-	-	-	-	-	-	> 6 ft to 9 ft
Snow with Foliage								
Sustained winds (mph)	-	40-50	40-50	40-50	50-60	-	-	-
Wind gusts (mph)	-	>50	>50	>60	>70	-	-	-
Wet Snow (inches)	-	>2	>3	>4	>6	>9	>12	>14
Rain and Wind without Foliage								
Sustained winds (mph)	-	35-40	40-50	50-60	-	-	-	-
Wind gusts (mph)	-	>40	>50	>60	-	-	-	-
Rain (inches)	-	>2	>3	>4	-	-	-	-
Nor'easter								
Sustained winds (mph)	40-50	40-50	40-50	40-50	-	-	-	-
Wind gusts (mph)	>50	>50	>60	>60	-	-	-	-
Rain (inches)	>1	>1	>1	>1	-	-	-	-
Snow (inches)	>1	>1	>1	>2	-	-	-	-
Storm Surge	>4ft	>4ft	>4ft	>4ft	-	-	-	-
Blizzard								
Sustained winds (mph)	25-35	35-45	40-50	40-50	50-60	-	-	-
Wind gusts (mph)	>40	>50	>50	>60	>70	-	-	-
Powder Snow	>12	>18	-	-	-	-	-	-
Wet Snow (inches)	>3	>4	>5	-	-	-	-	-
Storm Surge	>4ft	>4ft	>4ft	>4ft	>4ft	>4ft	-	-
Ice								
Ice Storm (inches of ice)	<1/4	>1/4<1/2	>1/2-3/4	>3/4-1	1-1.5	1.5-2	>2-2.5	-
Sustained winds (mph)	-	20-30	20-30	20-30	20-30	20-30	20-30	-
Wind gusts (mph)	-	>40	>40	>40	>40	>40	>40	-

c. Staffing Needs by Event Level

Following is a summary of the estimated number of mutual aid and/or contractor FTE resources needed to restore customers within the time associated with the event level. These numbers represent a range, and specific resource needs would be determined based upon the actual damage sustained. Resource needs are not specific to a type of weather event, but are more closely aligned with the potential damage based upon the classification in Section 6.b – Event Level Weather Predictors, or based on the actual damage sustained during an event. Resource requirements are linked to the event level, regardless of the type of weather that caused the classification. Mutual assistance needs will be continually reassessed throughout the event, and scaled up or down as necessary.

Resource level needs by event level for all internal ERP positions are included in the respective Appendix section.

MUTUAL ASSISTANCE / CONTRACTOR FIELD RESOURCES	EVENT LEVEL							
	5 MINOR	5 MODERATE	5	4	3	2	1A	1
Overhead Line Construction	-	-	25-50	50-100	100-150	150-300	300-450	450-900
Line Clearance/Tree	-	-	10-30	30-80	80-170	170-320	320-470	470-920
Low Voltage Service	-	-	Up to 10	10-20	20-30	30-100	100-200	200-400
Damage Assessors	-	-	-	Up to 50	50-100	100-150	150-200	200-400

d. Plan Activation

Following is a chart describing the plan activation process. Due to the varied nature of emergency events, actual response activities and resource needs can vary significantly and these will be determined on a case by case basis. Therefore the guidance contained in this section is not intended to be an absolute requirement or a required level of resources, nor should they be interpreted as such. This information is intended to be used as a guideline to aid decision making.

EVENT LEVEL	INCIDENT RESPONSE	INCIDENT MANAGEMENT TEAM
5 Minor	Crews may be held. Storm Room staffing may or may not be used and will depend upon anticipated severity. Alert notification will indicate staffing levels.	
5 Moderate	Crews may be held. Storm Room staffing may or may not be used and will depend upon anticipated severity. Alert notification will indicate staffing levels.	
5	Locally assigned contract crews and Avangrid wide resources could be requested. Some UI Emergency Storm Assignments may be activated.	Incident Commander will be activated along with command and general staff as required.
4	Locally assigned contract crews and Avangrid wide resources could be requested. Some UI Emergency Storm Assignments will be activated.	Incident Commander will be activated along with command and general staff as required.
3	Locally assigned contract crews and Avangrid wide resources could be requested. Mutual assistance or off site contractors will likely be required. UI Emergency Storm Assignments will be activated.	Incident Commander will be activated along with command and general staff as required.
2	Locally assigned contract crews and Avangrid wide resources could be requested. Significant mutual assistance and off site contractors will be required. UI Emergency Response Assignments will be activated. 100 % of resource pool activated. Will likely need to commit to external resources well in advance of event in order to ensure that estimated resource needs	Corporate Response: Response expands to the full Incident Management structure, with a fully staffed Command Center, and Regional De-Centralized Dispatch as required. Staging areas may be required to house, feed and / or supply crews.

EVENT LEVEL	INCIDENT RESPONSE	INCIDENT MANAGEMENT TEAM
	can be met.	
1A	Locally assigned contract crews and Avangrid wide resources could be requested. Substantial mutual assistance and off site contractors will be required. UI Emergency Response Assignments will be activated. 100 % of resource pool activated. Will be necessary to commit to external resources well in advance of event in order to ensure that estimated resource needs can be met.	Corporate Response: Response expands to the full Incident Management structure, with a fully staffed Command Center, and Regional De-Centralized Dispatch as required. Incident Staging areas will likely be required to house, feed and / or supply crews.
1	Locally assigned contract crews and Avangrid wide resources could be requested. Substantial mutual assistance and off site contractors will be required. UI Emergency Response Assignments will be activated. 100 % of resource pool activated. Will be necessary to commit to external resources well in advance of event in order to ensure that estimated resource needs can be met.	Corporate Response: Response expands to the full Incident Management structure, with a fully staffed Command Center, and Regional De-Centralized Dispatch as required. Staging areas will be required to house, feed and / or supply crews.

Figure 6.2 – Plan Activation Matching Guidance

Responsibility

Incident Management Section Chiefs and Officers, along with their respective team members, will be activated as determined by the Incident Commander. All other personnel will be called out by their respective supervisor or Section Chief or Officer. In the event that an employee does not have a specific assignment, the Manager of Operational Readiness will be responsible for identifying and notifying those personnel of their assignment.

Triggers

The incident identification guidelines are outlined in Figure 6.1 with plan activation matching guidance in Figure 6.2.

Declaration / Notification / Coordination

The Manager of Operational Readiness, or their designee, is responsible for the declaration of the event.

Notifications of appropriate response personnel will be in accordance with the process described in Section 2.d.

Activated emergency locations

UI Emergency Operations Center is activated and support locations will vary depending upon the nature of the event. Locations are listed in Section 2.f.

e. National Response Event

The Edison Electric Institute (EEI) member CEO's established a task force to identify enhancements to the existing mutual assistance process for weather events that have the potential to cause widespread damage throughout more than one region of the country. These types of events have become more intense and frequent over the last several years.

When multiple Regional Mutual Assistance Groups (RMAGs) cannot adequately support the resource requirements of the requesting utilities, the CEOs (or designated officers) of the requesting utilities may initiate the National Response Event (NRE) process. More efficient resource allocation would improve public safety, accelerate restoration and avoid economic consequences.

A National Event would meet the following criteria:
- Significantly impacts the energy infrastructure resulting in widespread power outages, telecommunications outages and fuel shortages
- Impacts life, property and security of a significant population
- Requires resources that exceed the capacity of the impacted and adjacent regions, in terms of level and capability
- Requires coordination of the Federal, State and Local response

This process will be overseen by the National Response Executive Committee (NREC), comprised of senior-level utility executives from all regions of the country. During an NRE, the NREC will activate a National Mutual Assistance Resource Team (NMART) that will evaluate mutual assistance requests and assign available resources to affected utilities in coordination with the RMAGs.

The NRE framework allows the industry to efficiently coordinate and scale its restoration resources to create an industry-wide national response effort while retaining the current,

successful, and geographically based RMAG mutual assistance process for events that do not require a national response. The NRE framework is designed to help increase public safety, accelerate the industry's response during national events, and minimize economic consequences for consumers and the nation.

However, there are several factors that arise during severe events that cannot be addressed by the NRE process.

- The NRE process coordinates the allocation of restoration workers on a national scale, but it does not create a larger overall pool of qualified restoration workers. The industry is working on workforce development through the Center for Energy Workforce Development and with programs like Troops to Energy Jobs, but these efforts are designed to bring new workers into the industry over time.

- The NRE process is not designed to directly address infrastructure needs. There is no one solution to hardening the infrastructure or making the system more resilient to storms and other events. These decisions are made by utilities and regulatory bodies that determine the most cost-effective measures to strengthen the grid and make it more resilient.

EEI will represent the electric utility industry with Federal Agencies in the integration of utility response in large events.

7. EVENT AND POST-EVENT

Following an event, UI follows a process to transition from Incident Management back to normal operations. This process consists of the following key activities:
- Notify all Incident Management Team Personnel that the event is considered ended and all functions / personnel can return to normal except for Section Chief or Officer who must conduct an After-Action review for their areas.
- Collect checklists and activity logs from Team Leaders – Officers, Section Chiefs and Branch Directors.
- Request information from Section Chief or Officer on any items that were left in an abnormal state and should be followed up on.
- Notify all Incident commanders from other entities that UI is de-activating its role in the EOC.
- Collect and review all safety related reports.
- Normal operations are phased back in according to pre-defined resumption criteria.

A post incident review and debriefing is conducted following the end of the emergency event to assess preparedness, response and restoration activities. The objective of the review and debriefing is to promptly identify processes that were effective and should be

sustained; along with deficiencies observed in the process and provide recommendations for improvement.

Identified action items will be completed, and the plans updated as necessary. When plans are updated, changes are communicated to the appropriate team members and training is conducted.

An After-Action Report will be completed within 60 working days after the end of the event and submitted to PURA, as required.

Attachment 1: Communications Reporting Schedule

Storm Communication Timeline