



**George Greenwood**  
Vice President  
Corporate Emergency Planning and Security

December 3, 2007  
By Hand Delivery

Hon. Jaclyn A. Brillig  
Secretary  
New York State  
Department of Public Service  
Three Empire State Plaza  
Albany, New York 12223

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EX  
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Re: Case 06-M-1078 - Proceeding on Motion of the Commission  
to Audit the Performance of Consolidated Edison Company  
of New York, Inc. in Response to Outage Emergencies.

Dear Secretary Brillig:

Enclosed for filing are the original and 5 copies of the Reply Comments of Consolidated Edison Company of New York, Inc. on the *Final Report – Independent Audit of Consolidated Edison Company Electric Emergency Outage Response Program for the New York State Department of Public Service* dated October 24, 2007. These comments are filed pursuant to your *Notice Inviting Comments*, issued October 25, 2007, in the referenced proceeding.

Very truly yours,

Enclosures

Cc. Benjamin Stein (by email)

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**CASE 06-M-1078 - Proceeding on Motion of the Commission to Audit the  
Performance of Consolidated Edison Company of New York, Inc. in  
Response to Outage Emergencies.**

**REPLY COMMENTS OF CONSOLIDATED EDISON COMPANY OF NEW YORK,  
INC. ON FINAL REPORT – INDEPENDENT AUDIT OF CONSOLIDATED EDISON  
COMPANY ELECTRIC EMERGENCY OUTAGE RESPONSE PROGRAM FOR THE  
NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE**

**Introduction**

On September 8, 2006, the Public Service Commission (“Commission”) instituted a proceeding to conduct an independent audit of Consolidated Edison Company of New York, Inc.’s (“Con Edison” or “the Company”) “operations, practices, and procedures related to emergency planning, response to outages, and restoration of service.”<sup>1</sup> On October 25, 2007, the Secretary to the Commission issued for comment the report on that audit titled, Final Report – Independent Audit of Consolidated Edison Company Electric Emergency Outage Response Program for the New York State Department of Public Service, dated October 24, 2007 (“Audit Report”).<sup>2</sup> Con Edison filed comments on the Audit Report on November 6, 2007.<sup>3</sup> These are Con Edison’s reply comments on the Audit Report.

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<sup>1</sup>Case 06-M-1078, *Con Edison Emergency Response Audit, Order Instituting Proceeding and Directing Audit and Confirming Order*, issued September 8, 2006, and September 20, 2006, respectively

<sup>2</sup> Case 06-M-1078, *Con Edison Emergency Response Audit, “Notice Inviting Comments”* (issued October 25, 2007).

The Company's initial comments provided an outline of the process that the Company has established for implementing the Audit Report's recommendations. The Company's reply comments provide an update of the Company's work plan.

### **Recommendation Implementation**

Con Edison's is committed to the principle of continuous improvement and recognizes the Audit Report as an opportunity to enhance its overall emergency management preparedness and response. The Company has established an organization and process to review and appropriately implement the recommendations, beginning with a comprehensive master plan, to bring more cohesion to the Company's existing emergency management efforts, and to strengthen its ability to anticipate, mitigate, and respond to emergencies.

As the Audit Report recommends, the recommendations have been organized into 14 discrete content areas, and 14 teams comprised of subject matter experts are assigned to develop the strategy and work plans for appropriate implementation of the respective content area recommendations. Each of the 14 teams report directly to the Company's Vice President of Emergency Planning and Security who coordinates team efforts and reports directly to the Emergency Management Steering Committee of senior Company executives who are overseeing the overall process. The team content areas are:

- corporate strategy and master plan (III R1-7)
- emergency management organizational structure (III R 8-19)
- incident command system refinements (III R20-22)
- comprehensive emergency response program effectiveness (IV R1-9)

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<sup>3</sup> Initial comments were also filed by the Western Queens Power for the People Campaign, the City of New York, Assemblyman Richard Brodsky, and the Office of the Attorney General. The Company's initial comments addressed the substantive issues raised by those parties' comments and we will not address them again here.

- emergency drill program expansion (V R1-4)
- trouble assessment process (V R5-6)
- workforce capability review (V R7-10)
- technical design criteria (V R11-20)
- customer communication (VI R1&5)
- call center capability testing (VI R2)
- estimated time of restoration methodology (VI R3-4)
- vegetation management program (VIII R1-2)
- financial and operational metrics (VII R3-4)
- best practice benchmarking (VIII R1-2)

The Corporate Strategy Team (recommendations (III R1-7)) is charged with developing the corporate strategy and master plan that will set the strategic framework to guide the work of the other teams. The Corporate Strategy Team has developed a draft corporate strategy consisting of an emergency management vision statement and an emergency management policy statement that establishes the Company's emergency management mission through guiding principles ("Emergency Management Principles").

The Corporate Strategy Team is also evaluating appropriate goals in the form of broad targets that would define how the Company will carry out the Emergency Management Principles over time.

Once goals for each of the Emergency Management Principles are established, objectives and action plans that support these goals will be developed by the 14 teams. These objectives and action plans will address Audit Report recommendations; initiatives already underway that are consistent with the corporate strategy, (i.e., System Emergency Assignments, tree trimming etc.); regulatory obligations and mandatory programs; reliability and customer service performance; etc.

Once these objectives and action plans are substantively identified the Emergency Management Organizational Structure Team (same as the Corporate Strategy Team) will begin to develop the organizational structure necessary to support the goals, objectives and action plans. The Company remains committed to keeping the Incident Command Structure (ICS) the cornerstone of the emergency response program.<sup>4</sup>

The Company will submit a copy of the updated emergency management master plan by March 2008. An interim progress report detailing the status of the team progress will be submitted by January 15, 2008.

Con Edison remains committed to continuing to improve its operations and provide customers the highest level of emergency preparedness, response, and service.

Dated: December 3, 2007

Respectfully submitted,

A handwritten signature in black ink that reads "George Greenwood" with a stylized flourish at the end.

George Greenwood  
Vice President  
Emergency Planning and Security

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New York, Inc.  
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<sup>4</sup> The importance of the Incident Command System is recognized in the Audit Report (p. 41):

*Many years ago, Con Edison made a pivotal and forward-thinking decision to adopt the Incident Command System (ICS) as its fundamental organizational approach to incidents of all kinds. This was a pioneering effort among utilities, and Con Edison remains as one of the few electric utilities making this commitment. ... This approach to responding to emergencies puts the Company at the forefront of the industry, and firmly in tune with the other emergency response organizations.*