

**IN THIS ISSUE**

**Communicating with Vulnerable  
Customers during Severe Weather  
Outages**

**NOTE TO READERS**

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**Severe Weather Outages:  
Communications with Residential and  
Vulnerable Customers**

The discussion below provides information on ways in which utilities have engaged in storm response and storm preparedness actions specifically as those actions relate to public communication with residential customers. Providing adequate communication during storm events is generally found to be a customer service obligation of a state's utilities.<sup>1</sup>

The discussion is based on a White Paper prepared by Fisher, Sheehan & Colton for the Pennsylvania Office of Consumer Advocate ("OCA") in response to a Proposed Policy Statement issued on September 26, 2013 by the Pennsylvania Public Utility Commission ("PUC" or "Commission"). In its Proposed Policy Statement, the Pennsylvania Commission stated that it was seeking to "identify further best practices in an effort to achieve continuous improvement" and to "continue to enhance its policies as these best practices are further developed and defined." According to the Commission, the Proposed Policy Statement was intend-

<sup>1</sup> See, e.g., New Jersey Administrative Code, Sec. 14:3.3.3(c) (2013). ("If a customer's service is likely to be affected by peculiar or unusual circumstances, the public utility shall inform the customer as to how the customer can minimize the effect of such circumstances in order to secure sufficient and satisfactory service from the utility's system.") See also, Investigation by the Department of Public Utilities on its Own Motion into the Preparation and Response of NSTAR Electric Company to Tropical Storm Irene (August 2011) and the October 29, 2011 snowstorm. Docket No. 11-85-B / 11-119-B, Massachusetts Department of Public Utilities, Order, at 86 (December 11, 2012) ("The ERP Guidelines require electric companies to have an ERP designed to restore service in a safe and reasonably prompt manner. 220 C.M.R. § 19.03(3). Electric companies' obligation to communicate with stakeholders falls within this restoration requirement.")

ed to “memorialize a number of the best practices that were identified in the review, as well as other initiatives that would be of benefit.”

Utilities and their regulators can learn from the actions of their counterparts not merely from around the state, but also from around the nation. Accordingly, FSC’s White Paper provided a review of communication with residential customers based on more than fifty (50) storm response assessments from around the United States. These storm response assessments have been prepared regarding a range of severe weather, including wind, rain, thunderstorms, hurricanes, snow, ice and similar events.

### 1. The Use of Outbound Auto-Dialers

In many states, auto-dialers are viewed as the “best available technology” and are seen to be a cost-effective and efficient means of reaching residential customers before, during and after a storm event. Virginia utilities, for example, developed and operate what they call “COINS” (“Customer Outbound Information Notification System”).<sup>2</sup> Through COINS, Virginia’s utilities automatically call customers as service to geographic areas is restored. The COINS call is to verify that the customers who the utilities expect to have had service restored do, in fact, have their service restored.

Empire District Electric Company (Missouri) does not call *all* customers in the geographic area thought to be restored (as it is restored). Nonetheless, EDE operates an outbound calling protocol with similar objectives. Following restoration of service, EDE calls customers near the end of the line to verify that restoration is complete.<sup>3</sup> EDE engages in the assumption that if service at the end of the line has been restored, service to each of the customers along the line

<sup>2</sup> Virginia State Corporation Commission Staff (August 18, 2010). *Preparation for and Response to the December 2009 Snowstorm*, at 52.

<sup>3</sup> Missouri Public Service Commission Staff (June 17, 2008). *Report on the Empire District Electric Company, Final Report on Storm Preparation and Restoration Effort*, Docket No. EO-2008-0215, at 29.

has been similarly restored. So, too, did the South Carolina commission staff recommend that outbound automatic calls, both relating to Estimated Times of Restoration (“ETRs”) and to actual restoration of service, be expanded beyond medical needs customers.<sup>4</sup>

Auto-dialers around the nation, however, are not used exclusively to communicate the restoration of service. Kansas City Power and Light Company places an automatic return phone call to all customers reporting outages through the Company’s IVR system.<sup>5</sup> The customers receive the following prerecorded message: “As an automated service from Kansas City Power & Light, this call confirms we have received the outage report submitted for this address. Crews are currently working to restore service. Thank you for your patience and cooperation as we work to restore your electrical service.” The calls received by the Company’s IVR system are forwarded to a third-party contractor in 30-minute intervals and the customers reporting their outage to TFCC receive a confirmation phone call within 30 minutes.

In New York, Consolidated Edison updates its ETRs on a daily basis. Customers now receive an automatic call-back whenever an ETR has been assigned or modified.<sup>6</sup> In fact, in June 2012, the New York State Department of Public Service reported that New York’s “utilities continue to expand their use of new technology to communicate with their customers during storm emergencies. During Irene and Lee, many utilized automatic outbound dialing. . .”<sup>7</sup> Of the

<sup>4</sup> South Carolina Office of Regulatory Staff (January 31, 2007). *Review of Duke Energy Carolinas December 2005 Ice Storm Recovery*, at 24.

<sup>5</sup> *Final Report on Kansas City Power and Light Company’s Storm Outage Planning and Restoration Effort following the Ice Storm on December 10 and 11, 2007*, at 31, Case No. EO-2008-0219, Public Service Commission Staff Report (June 17, 2008).

<sup>6</sup> Vantage Consulting (October 24, 2007). *Final Report, Independent Audit of Consolidated Edison Company, Electric Emergency Outage Response Program*, for the New York State Department of Public Service, at 153.

<sup>7</sup> New York State Department of Public Service, *Utility Performance Report Following Hurricane Irene and Trop-*

state’s electric utilities, the New York State DPS reported the following using automatic outbound dialing.<sup>8</sup>

Consumer Outreach Methods Used by New York Electric Utilities	
Company	Automated Dialing
Central Hudson	Yes
Con Edison	Yes
National Grid	Yes
NYSEG	Yes
Orange and Rockland	Yes

## 2. Public Safety and Communications with Special Needs Customers

The residential customer class is not a uniform, monolithic group of customers for whom traditional communications mechanisms can be relied upon to protect public safety. There are special needs residential populations for whom utilities may need to take special care in ensuring adequate communications before, during and after a storm event. Special needs residential populations extend beyond customers who have medically-necessary electric equipment. Special needs populations include, also, the aged, the disabled, the infirm, and others for whom traditional communications may not be adequate and who can reasonably be expected to exhibit particular identified or reasonably foreseeable vulnerabilities in the event of a storm event. The policy need for protection arises from the potential, if not probable, public safety hazards resulting from the loss of service.

Some utilities in the nation focus their use of auto-dialers on special needs customers. New York’s electric utilities, for example, are required to maintain lists of vulnerable customers. Not only do New York utilities make pre-storm calls, but New York utilities also make daily follow-up calls throughout the event and service

restoration period.<sup>9</sup> Vulnerable customers are either scheduled for field visits by New York electric utilities or are referred to a third party contractor to make follow-up contacts.

Maine, too, requires specific proactive action by that state’s utilities directed toward special needs customers. The Maine Commission stated in a 2002 Docket, “[d]uring Winter Storm 2002, both [Bangor Hydro and Central Maine Power] employed reactive policies regarding their customers with pre-existing medical emergencies and their customers with life support designations. We find such a reactive policy unacceptable. . .”<sup>10</sup> The PUC said “both BHE and CMP must implement proactive policies regarding life-support customers whenever they are aware that a lengthy outage is likely to occur, regardless of how the utility categorizes the storm.”<sup>11</sup>

A number of Massachusetts electric utilities use a proactive, inter-active, outbound calling program to reach vulnerable customers. Specifically:

- Western Mass Electric Company’s (WMECO) Emergency Response Plan (“ERP”) requires the company to contact “life support customers” (“LSC”) through an automated dialer before, during and after weather events that could involve significant outages.<sup>12</sup> One primary message communicated through

<sup>9</sup> *Utility Performance Report Following Hurricane Irene and Tropical Storm Lee*, supra, at 61.

<sup>10</sup> Maine Public Utilities Commission, Docket 2002-151, Investigation into the Adequacy of Utility Services in Maine During Power Outages, Examiner’s Report, at 73 – 74, August 29, 2003. The recommendations of the Examiner’s Report were subsequently adopted by the Commission with limited changes not related to those cited here. Docket 2002-151, Order, at Ordering Paragraph 28 (November 14, 2003).

<sup>11</sup> *Id.*, at 75, citing Section 7(C), Chapter 810, Code of Maine Regulations.

<sup>12</sup> Investigation by the Department of Public Utilities on its Own Motion into the Preparation and Response of Western Massachusetts Electric Company to the October 29, 2011 Snowstorm, Docket No. DPU-11-119-C, at 103 (December 11, 2012).

*ical Storm Lee*, at 28.

<sup>8</sup> *Id.*, at 29.

WMECO's communication to LSCs is the necessity to call public officials for help; the messaging also provides the way to make such contacts. WMECO provides lists to public officials of LSCs who may benefit from local attention. Finally, WMECO engages in daily calling to all LSCs who are confirmed to be without power until power is restored.

- National Grid in Massachusetts places manual daily "well-being" calls to affected LSCs before, during and after a storm event to determine if they need emergency assistance and to connect them with public officials if necessary.<sup>13</sup> These calls continue until the company confirms that the LSC has power or has power restored. The company provides field visits, or notice to public officials, if company staff cannot reach an LSC live or by voicemail.
- NSTAR, an electric and gas utility in Massachusetts, maintains an up-to-date list of LSCs with whom the company makes contacts before, during and after a storm event.<sup>14</sup> NSTAR's communication protocol provides that: (1) a day ahead of the storm, the company initiates an automated outbound calling to indicate that a storm is approaching, outages are possible, and the customer should make plans. Between 12 and 24 hours ahead of the storm, NSTAR provides a list of LSCs to local officials (names, addresses, phone numbers). Not more than one day after a storm

event begins, NSTAR provides another outbound home call. During the restoration period, there is a periodic live monitoring of LSCs to determine whether they are without power. Notice is given to local officials of all LSCs without power.

In addition to utility-initiated communication efforts, utilities in St. Louis, Missouri, work with a community-based partnership called "Operation Weather Survival" ("OWS").<sup>15</sup> Through OWS, the utilities work to disseminate outage information, as well as to monitor special needs customers, through a network of neighborhood watch groups organized through a joint effort of the utility and the community groups.<sup>16</sup> Created in 1982, OWS is a network involving community groups, utilities, educators, public officials, and the business community.

The use of third party partnerships is also similar to the Missouri-based Empire District Electric Company's "EASE" program (Empire Action to Support the Elderly).<sup>17</sup> Through EASE, Empire allows customers to preregister in a "special needs registry" for the elderly and disabled. Before a storm event presenting the probability of substantial outages, Empire makes outbound phone calls to inform customers in the registry of what storm preparations to make; the Company also informs registrants of shelter locations and other critical storm-related information. In making these calls, Empire uses company personnel that are familiar with local resources to

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<sup>13</sup> Investigation by the Department of Public Utilities on its Own Motion into the Preparation and Response of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid to Tropical Storm Irene (August 2011) and to the October 29, 2011 Snowstorm, Docket No. DPU-11-85-A / 11-119-A, at 134.

<sup>14</sup> Investigation by the Department of Public Utilities on its Own Motion into the Preparation and Response of NSTAR Electric Company to Tropical Storm Irene (August 2011) and the October 29, 2011 Snowstorm. Docket NO. DPU-11-119-B, at 102 – 103.

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<sup>15</sup> Utility partnerships with OWS involve all of the St. Louis utilities, not merely the electric utility. Operation Weather Survival also provides information throughout the community during extreme hot and cold weather conditions. Those efforts are beyond the scope of this discussion.

<sup>16</sup> Missouri Public Service Commission Staff (November 17, 2006). *Report on AmerenUE's Storm Outage Planning and Restoration Efforts Following the Storms of July 19 and 21, 2006*, at 7; see also, Rhode Island Division of Public Utilities and Carriers (Feb. 2012). *Review of National Grid Storm Preparedness, Response and Restoration Efforts*, at 62 – 53.

<sup>17</sup> Empire District Electric (Missouri), *supra*, at 37.

inform these high risk customers of locally-available emergency resources.<sup>18</sup>

So, too, in Washington D.C. does PEPCO use third party partnerships. As PEPCO noted in 2011, “[t]he Company is considering establishing partnerships/task forces with organizations whose primary focus and capability is geared toward re-establishing a level of normalcy in a community to utilize best practices and leverage resources.”<sup>19</sup> PEPCO had previously reported to the D.C. Commission that alternatives considered for improving communications included: (1) contacting local “Neighborhood Advisory Commissions” (“ANCs”) “in affected areas so ANCs can serve as a vehicle to disseminate outage information to their constituents;” and (2) using ANC “listservs” as a means to disseminate outage information.<sup>20</sup>

### 3. “Blue Sky” Communications with Residential Customers

Working with community-based organizations also occurs on a “Blue Sky” basis. Much storm

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<sup>18</sup> Kansas City Power and Light (KCP&L) uses its Customer Relations Department to serve as a point of contact for vulnerable customers and/or the organizations that serve them. KCP&L targets the customer groups within the Customer Relations Department and provides a communication channel to the Commission and external “helping organization” by providing information. During the December 2010 ice storm in Missouri, KCP&L’s target groups included, but were not limited to: 1) medical needs customers, 2) gatekeeper customers, 3) assistance agencies / senior centers, 4) nursing homes and hospice organizations, and 5) elderly customer referrals. *Final Report on Kansas City Power and Light Company’s Storm Outage Planning and Restoration Effort following the Ice Storm on December 10 and 11, 2007*, at 40, Case No. EO-2008-0219, Public Service Commission Staff Report (June 17, 2008).

<sup>19</sup> D.C. Public Service Commission, “PEPCO Response to Commission Order 16426,” at 15, Formal Case 982, In the Matter of the Investigation of Potomac Electric Power Company Regarding Interruption of Electric Service, August 9, 2011.

<sup>20</sup> D.C. Public Service Commission, “Report of the Productivity Improvement Working Group in Response to Order Nos. 15179 and 15220,” at 3 and 4, Formal Case 982, In the Matter of the Investigation of Potomac Electric Power Company Regarding Interruption of Electric Service, (April 7, 2009).

preparedness communication occurs outside the context of a specific storm event. This between-storm effort focuses on communicating individual household storm preparedness. Empire District’s Blue Sky efforts educate residential customers on what customers might do, as individual households, to prepare for storm-related outages.

In particular, FEMA has two ongoing programs, both of which are specifically designed to advance household preparation in the event of a storm outage (or other emergency). The first program is FEMA’s “Resolve to be Ready” initiative; the second is FEMA’s “Pledge to Prepare” initiative. Local utilities are in a uniquely positive position to help communicate these preparedness campaigns.

- Through the FEMA “Resolve to be Ready” initiative, households are encouraged to prepare (and be ready to implement) a “Family Emergency Plan” (a template for which is available through [www.ready.gov](http://www.ready.gov)). The “Resolve to be Ready” initiative promotes household preparedness ranging from building family emergency kits (one for the home and one for the car), to encouraging placing a “smart phone” in an emergency kit, to arranging for an out-of-state emergency contact through and with whom the family can communicate in the event that local sources of information are unavailable.
- The “Pledge to Prepare” initiative is similar in many ways to “Resolve to be Ready.” Through “Pledge to Prepare,” however, individuals may not merely take individual actions, but may attend trainings on local disaster preparedness; may help organize community events; may help in organizing educational events or drills; and may engage in other public processes through the National Preparedness Coalition.

A second type of “Blue Sky” communication/education effort pursued by utilities involves communication regarding the delineation of responsibility between the utility and the customer with respect to service restoration. After a storm event, a customer may be without power either due to problems with the utility infrastructure or due to problems that exist on the customer side of the electric system. When customers do not understand that it is not the utility’s responsibility to repair household-specific problems, the failure of a customer to have power restored to a home may be unjustly “blamed” on the utility. Not only does this failure give rise to customer dissatisfaction, but in addition, to the extent that the dissatisfied customer communicates with the utility, it may divert scarce utility resources from resolving those problems that are within the province of the utility to correct.

Some utilities periodically communicate to their customers where the line of repair responsibility lies. In particular, customers are told that, particularly if neighbors and immediate abutters have power but the customer’s power is still “out,” it is possible that there is damage to the customer’s electric system. On the other hand, a utility might facilitate customer repair efforts to respond to these problems. New Hampshire and Maine utilities, for example, post on their web sites non-endorsed electricians that can respond to household-specific outage problems along with the geographic service territories that these electricians serve.

#### 4. Multi-Lingual and Multi-Cultural Communications

The Pennsylvania State Data Center (Penn State—Harrisburg) reported in March 2011 that “Pennsylvania’s Hispanic population is the fastest-growing minority group in the state. . . The population (of any race) who is Hispanic or Latino grew by 82.6 percent between 2000 and 2010, an increase of 325,572 people. The Hispanic (or Latino) population now accounts for 5.7 percent of the state’s population.”<sup>21</sup> The

<sup>21</sup> Pennsylvania State Data Center (March 11, 2011). *Re-*

search Brief: *Census 2010 Shows Hispanic Population the Fastest Growing Minority Group in Pennsylvania.* . . . State Data Center subsequently reported that, by 2012, “Pennsylvania’s racial and ethnic composition continues to grow more diverse. The minority population in Pennsylvania increased by 115,664, or 4.5 percent, since the 2010 Census. According to the 2012 Population Estimates, the commonwealth’s minority population has eclipsed the 2.7 million mark.”<sup>22</sup>

North Carolina identified some best practices in reaching multi-lingual customers following a snow and ice storm in 2002.<sup>23</sup> As in Pennsylvania, that state has a large and growing non-English-speaking population. North Carolina’s review of utility responses to a 2002 ice storm reported that that state’s utility effort to communicate with its Spanish-speaking customers was “commendable.” Communication efforts that North Carolina’s utilities, most notably Progress Energy and Duke Power, made with respect to its non-English-speaking populations included:

- Establishing a unique toll-free number for Spanish-speaking customers, thus providing those customers an additional channel to access Spanish-speaking specialists and enabling them to hear the same storm information messages that English-speaking customers heard;
- Promoting the new toll-free number on radio stations targeted to Spanish-speaking customers;

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*search Brief: Census 2010 Shows Hispanic Population the Fastest Growing Minority Group in Pennsylvania.*

<sup>22</sup> Pennsylvania State Data Center (June 13, 2013). *Detailed State and County Population Estimates Released for Pennsylvania: State’s Elderly Population Surpasses Two Million; Minority Population Continues Growth.*

<sup>23</sup> North Carolina Utilities Commission and Public Staff (September 2003). *Response of Electric Utilities to the December 2002 Ice Storm, Report to the North Carolina Natural Disaster Preparedness Task Force*, at 32 – 35. See also, Dan O’Neill (May 10, 2006). *Regulatory Trends in Emergency Preparedness and Storm Restoration*, at 6 (“In these post-storm audits, there were common themes. . . inadequate multi-language media messaging and appropriately fluent service/field representatives.”)

- Utilizing Spanish-speaking company employees to provide translations, information and interviews to major Latino news outlets;
- Translating all storm restoration news releases into Spanish and distributing them to Spanish-language media outlets, while also including them on the company's website;
- Providing enhancements to the companies' automated outage reporting systems enabling Spanish-speaking customers to have the exact outage reporting functionality that is provided to English-speaking callers, including the option of receiving a Spanish-speaking callback. Progress Energy, for example, has in-place a callback functionality allowing customers to receive a callback confirmation message in the same language in which the outage was reported, even if the confirmation call is answered by an answering machine. Duke Power reported that it was considering incorporating a similar callback function into its Spanish Outage Reporting application.

References to “culturally appropriate” communications during storm events refer to the observation that effective communications must consider the medium as well as the message. Multilingual media messaging provides less benefit if used with communication channels that customers do not turn to for information. Enlisting and engaging the communication channels that are appropriate to the populations which the communication is intended to reach is one important aspect of storm-related communication.

## Conclusion

The areas discussed herein are based on a review of more than 50 assessments of severe weather responses by public utilities from around the country. Improved communication with customers, including targeted communication with vulnerable customers, should work to improve public safety.

For more information on utility communications with vulnerable customers during severe weather outages, please write:

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Fisher, Sheehan and Colton, Public Finance and General Economics (FSC) provides economic, financial and regulatory consulting. The areas in which FSC has worked include energy law and economics, fair housing, affordable housing development, local planning and zoning, energy efficiency planning, community economic development, poverty and telecommunications policy, regulatory economics, and public welfare policy.

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