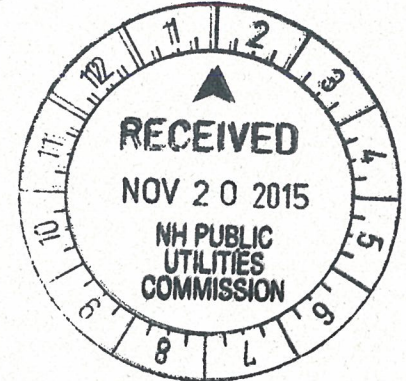




Mark Dean
Attorney

November 17, 2015



Debra A. Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit Street
Concord, NH 03301-24229

RE: IR 15-047 Electric Utilities, November 2014 Snowstorm After Action Review

Dear Director Howland:

Pursuant to the Commission's October 20, 2015 secretarial letter in this docket, New Hampshire Electric Cooperative, Inc. ("NHEC") provides the following comments concerning the September 29, 2015 report filed by the Commission's Staff ("Staff").

General Comments

NHEC has participated in each of the Commission's after-action storm response reviews. NHEC sees these reviews as complimentary to NHEC's own self-assessment activities and as valuable opportunities to share and be informed by the lessons learned from statewide experiences and perspectives.

As was the case in previous after-action reviews, the efforts and diligence of the Staff throughout this detailed and complex process have been commendable, and the resultant report informative. NHEC is actively working to take advantage of the lessons learned in the review process and highlighted in the Staff's September 29, 2015 report. NHEC is in the process of updating its Emergency Response Plan for Outage Restoration accordingly.

There are, however, a few items within the Staff report, specific to NHEC, which require clarifying comments.

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Clarifying Comments

1. NHEC does not fully agree with the report's characterization of the jurisdictional basis of NHEC's participation in this after-action review, contained in footnote 4 on page 2 of the report. NHEC believes that the specific language of the MOU cited in that footnote most fully and accurately describes the basis for NHEC's participation in the instant proceeding. NHEC makes specific reference to Paragraph 2 - *Participation in After Action Reviews* and the related footnotes 1 and 2, at page 2, of the MOU.
2. NHEC believes it may not have provided Staff sufficiently detailed information concerning NHEC's weather forecasting resources to accurately inform the report's description of those resources at pages 33 and 80.

Beginning in the year 2013, NHEC contracted for weather forecasting services with North Winds Weather located in Sandwich, New Hampshire and Portland/Grey, Maine. In conjunction with North Winds Weather, additional weather services are provided to both North Winds Weather and NHEC by Precision Weather Service located in Portland, Maine.

Depending on the weather event and potential impact to the NHEC's service territory, forecasts provided to NHEC by these services are communicated on a New Hampshire regional geographic basis (north, south, east, west, and central). In some circumstances these forecasts are refined down to the NHEC district office location and the NHEC territory served by that district.

NHEC continues to utilize these services along with the other readily available local and national services, which are monitored on a 24 hour basis by the NHEC Incident Command as well as NHEC's 24-hour, 365 day per year control/dispatch center located in Plymouth, NH.

After storm impact/damage information is downloaded from NHEC's Outage Management system, it is shared on a regular basis with North Winds Weather to continually build the data base concerning the types of weather events and the expected impacts that NHEC may anticipate in its service territory. By this process, NHEC is working with North Winds Weather towards developing a NHEC-specific predictive model.

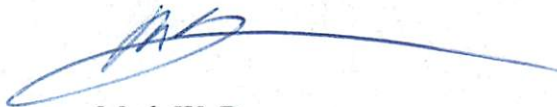
3. The first paragraph of section B, page 59, of the report implies that NHEC is not a member of NAMAG (formerly NEMAG) and therefore has not made arrangements for the possible utilization of additional restoration resources through that group. In fact, NHEC is a long-standing member of NAMAG (and its predecessor NEMAG) and has the same access to restoration resources through that organization as do the three regulated electric companies.

4. Bullet item 2, page 78, of the report indicates uncertainty concern whether or not NHEC currently incorporates certain weather related factors into its impact indices. The report correctly observes that this detail is not stated in NHEC's current ERP. To clarify, NHEC does currently incorporate these factor in it its impact indices. NHEC is revising its ERP to capture this detail.

Thank you for your attention to this matter. If you have any questions concerning these comment please do not hesitate to contact me.

Electronic versions of these comments have been provided to the service list and an electronic version has been emailed to you separately.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MWD', with a long horizontal flourish extending to the right.

Mark W. Dean