LUMA's Response to Hurricane Fiona

NEPR-MI-2022-0003

Response: RFI-LUMA-MI-2022-0003-20221118-PREB-B001

SUBJECT

Restoration Stage Reports – Within First 6 Hours

REQUEST

Within the first six hours of the restoration period:

a. Explain why LUMA did not provide the Energy Bureau with notification of the start time of the Restoration Period.

b. Indicate at what time and what date the Restoration Period started.

RESPONSE

a. LUMA's ERP is a plan, tool, and framework for LUMA's response to all potential emergencies. No two emergencies are identical, and it would not be prudent to respond in the exact same manner. For situations that the ERP does not fully contemplate, LUMA uses the ERP as a guideline and relies on situational awareness and industry expertise to restore the T&D system as safely and efficiently as possible.

   Please see Table 16 from Annex A of the ERP below which suggests that within the first six hours of the restoration period, "The utility shall indicate that it will be a multi-day event (i.e., greater than 48 hours). The notification shall be made to regulatory authorities and will state what LUMA has defined as the start of the restoration period."

Type 1 and 2 Events expected to last greater than 48 hours

Within the first 6 hours of the restoration period
• The utility shall indicate that it will be a multi-day event (i.e., greater than 48 hours). The notification shall be made to regulatory authorities and will state what LUMA has defined as the start of the restoration period. • Provide a public statement indicating the likelihood of extended outages and make this information available via customer representatives, IVR systems, and websites. • In certain situations (e.g., nighttime events), only limited information may be available within the initial six-hour window. In these situations, the expectation is that the companies will inform regulatory authorities of the delay in determining the initial outage duration within six hours and the notification will occur in an expedited manner as information becomes known. Following a nighttime storm, the determination of whether the restoration period will be greater than 48 hours will be communicated as soon as possible, but no later than noon the following day. Any delay in establishing the initial storm expectations will not affect the time requirements below.

Table 16: Restoration activities for events greater than 48 hours

LUMA communicated daily to the Energy Bureau and P3A since the storm made landfall, that the restoration period would be a multi-day event and provided updates regarding assessment. In LUMA's first report to the Energy Bureau following landfall LUMA states, "Given the size and scope of the outage, as well as ongoing impacts of Hurricane Fiona, full power restoration could take several days. We are coordinating with PREMB and other agencies and will continue to keep our customers updated."

At the official start of the restoration period LUMA was focused on communicating global ETRs with the Energy Bureau, P3A, and the public on September 18, 2022, since the statement above was communicated in the first report following landfall. Due to the focus global ETRs were able to be delivered to all at 1300 hours on September 25, 2022, ahead of the deadline. This was within the six hour timeframe in question. Please refer to Figure 3-1 in theIntroduction document for a timeline of events.

b. In accordance with the timeline defined in the Introduction document, the restoration period began at 0700 hours on September 25, 2022.

While Hurricane Fiona restoration activities were initiated as soon as it was safe to do so following the emergency event, the restoration period does not begin until after the preliminary damage assessment is complete. In the case of a Type 1 Catastrophic Event, as per Table 3 from Section 7.1.8 in Annex A of the ERP, the reasonable amount of time to complete the preliminary damage assessment is approximately 120 hours.

Preliminary DA Reasonable Time		
Event Type	**Duration of Event**	**Response Time**
Type 3 or 2 – High Alert or Emergency Conditions	3 to 5 days	36 hours
Type 2 – Emergency Conditions	5 to 10 days	72 hours
Type 1 – Catastrophic	Greater than 10 days	120 hours

Table 3: Reasonable time for preliminary damage assessment