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January 5, 2015

The Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, Newfoundland & Labrador
A1A 5B2

Attention: Ms. Cheryl Blundon
Director Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro - the Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System: Supplementary Response in Relation to PUB-NLH-462

In its response to the Board's Request for Information PUB-NLH-462, Hydro indicated that additional documentation would be provided to the Board when the related work was completed. In this regard, please find enclosed the original and 12 copies of the following:

- Customer Service Business Continuity Plan

We trust the foregoing is satisfactory. If you have any questions or comments, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Geoffrey P. Young
Senior Legal Counsel

GPY/jc

cc: Gerard Hayes – Newfoundland Power
Paul Coxworthy – Stewart McKelvey Stirling Scales
Thomas Johnson – Consumer Advocate
Danny Dumaresque
ecc: Roberta Frampton Benefiel – Grand Riverkeeper Labrador

Customer Service

Business Continuity Plan

The contents of this document are subject to review and revision. This document is owned and maintained by the Customer Service Department within the Corporate Relations Division. Questions about this document should be directed to tonylye@nlh.nl.ca

Requested By

Requestor	Tony Lye	**Department**	Customer Service	**Project Name**	Business Continuity Plan

Prepared By

Name	Ron Lane
	Customer Communications & Billing Administrator

Approved By

Customer Service Manager			
	Tony Lye	(signature)	(date)

Revision History

Version	Date	Summary of Changes	Name
1.0	12-Dec-14	Document Creation	Ron Lane

Table of Contents

Preface

This document provides an overview of the process to follow in the event of a severe disruptive incident and to ensure that the Customer Service department has the ability to continue to provide services and fulfil its customer obligations.

1. Introduction

The objective of this Business Continuity Plan is to ensure that the Customer Service (CS) Department has the ability to continue to provide services and fulfil its customer obligations during a disruptive incident. This plan therefore considers risks to the services and the impacts they might have, and then considers and plans for actions to reduce the potential impact, taking in to account the interests of our customers and staff.

1.1 Recovery Strategy

Delivery of the services from St. John's will be maintained by existing CS staff working from remote locations or an alternative work site located within St. John's or a neighbouring community. The approach will vary depending upon tasks required, time and magnitude of incident and scope of work required to be completed in relation to the impact of the disruption.

1.2 Scope

This plan covers the activities of the Customer Service Department and the business continuity arrangements to ensure that in the event of an incident the impact to the business is minimized.

Our Customer Service Department is comprised of five different functions; Call Center, Billing, Meter Reading, Technical Support and Revenue Metering & Quality Assurance.

The Customer Service Department operates within the hours of 8am to 4pm Monday to Friday. Our Call Center is opened from 8:30am to 4pm for billing and general account inquiries and from 8:00am to 4:00pm for outage calls. Outside of these normal business hours outage related calls are presently handled by the Energy Control Centre.

1.3 Risk Assessment

The table below provides examples of the type of risks that could affect Hydro Place for the three defined categories

Risk To	Description
Site	Extreme weather may be a factor that would close our site. There have been instances of large snow falls that have closed our site in previous winters. In each of the instances we closed the site due to severe weather, there was no impact to the building and technology and the site was re-opened the next business day.
People	Extreme weather would pose problems for people getting into work. In these situations CS managers or supervisors would help our employees

	arrange transportation so they can get into work safely. A Pandemic would be another scenario that would pose a threat to our work place if workers were unable to come to work.
Technology	Power outages, phone and internet connectivity, loss of IT infrastructure that support our applications and tools.

1.4 Business Impact Analysis

The table below outlines the critical tasks for all Customer Service functions. The table also includes the maximum tolerable period of disruption and recovery time objective for each of the tasks.

Maximum Tolerable Period of Disruption (MTPD) – this is the maximum time that the Business could continue without this activity being available. After this time customer satisfaction and other departments' work get impacted, loss of reputation, etc.

Recovery Time Objective (RTO) – this is the planned time that the service will be available after disruption. This time will be a combination of the recovery steps and other dependencies. Agreement should be made with the department or supplier responsible for the restoration of dependent services confirming their recovery time.

The Customer Service Department is dependent on other internal service providers to ensure equipment and infrastructure is restored to deliver service to Hydro's customers.

A high level list of activities performed by our Customer Services Department are identified below.

Critical Activities	Maximum Tolerable Period of Disruption			Recovery Time Objective
	<36 hrs	Up to 5 days	2 weeks	Hours
Handling of Customer Outage or Service Calls	MAX			< 12 hrs
Handling of Customer Billing Inquires		MAX		* 48 hrs
Request for New Service/Transfer of Service		MAX		* 48 hrs
Process Billing (Residential)		MAX		96 hrs
Process Billing (Industrial)		MAX		96 hrs
Radix (Preparing Handhelds)		MAX		72 hrs
AMR Meter Readings		MAX		72 hrs
Reading Meters	MAX			24 hrs
Process request for Contribution In Aid of			MAX	72 hrs

Critical Activities	Maximum Tolerable Period of Disruption			Recovery Time Objective
	<36 hrs	Up to 5 days	2 weeks	Hours
Construction (CIAC)				
Preparing Meters for Shipping			MAX	96 hrs
Meter Calibrations			MAX	96 hrs
Generation and Mailing of Bills		MAX		96 hrs
* *Dependent on Information Systems (IS) ability to restore service*				

1.5 Service Interdependencies

The Customer Services Department rely upon Hydro Place being opened to perform the following functions.

Services delivered from Hydro Place	Service Owner
Call Centre Operations	Ron Lane
Residential Billing	Ron Lane
Industrial Billing	Ron Lane
Technical Support	Jim Wiseman
Radix Support	Ron Lane
Revenue Metering and Quality Assurance	Rick Smith
Generation and Mailing of Bills	Glenn Whiffen
External Services	**Location (s)**
Meter Reading	Various
New Customer Connections	Various
Customer Disconnects	Various
Other sites that Rely on Services delivered from Hydro Place	**Location (s)**
Transmission and Rural Operations Central (TROC)	Bishop's Falls
Transmission and Rural Operations Northern (TRON)	Port Saunders
Transmission and Rural Operations Labrador (TROL)	Labrador and Happy Valley-Goose Bay

1.6 Department Teams

The table below identifies functions within Customer Service and the contact information for leaders of each of the functions. The Full Time Equivalent (FTE) numbers show the usual staff complement delivering the service, the number of workspace positions required initially, e.g.

within 36 hours, and the minimum number of positions to deliver a best effort service in the short term.

The table is organised in the priority of the importance of service restoration. The exact priority will depend on the timing of the incident and whether or not staff can work from home or alternate locations. For example, Managers and Supervisors could work from home with laptops whereas billing functions cannot, so they have a greater restoration priority.

			HEAD COUNTS			
FUNCTION	CONTACT	TEL: MOBILE	USUAL	<36HR	5DAY	2WKS
Call Centre	Ron Lane	[redacted]	6	6	6	6
Billing	Ron Lane	[redacted]	3	0	3	3
Meter Reading	Jim Wiseman	[redacted]	14	14	14	14
Technical Support	Jim Wiseman	[redacted]	2	0	2	2
Revenue Metering and Quality Assurance	Rick Smith	[redacted]	3	1	3	3
		TOTALS	**28**	**21**	**28**	**28**

2. Department Incident Management Team (DIMT)

The Customer Service DIMT will have an overall incident commander and primary and secondary contact for each departmental function.

Department Incident Management Team Contact Details

Name	Function/Role	Tel: Mobile	Tel: Home
Tony Lye	**Incident Commander**	[redacted]	[redacted]
Ron Lane	Secondary	[redacted]	[redacted]
Ron Lane	**Call Centre Lead**	[redacted]	[redacted]
Tracy Maynard	Secondary	[redacted]	[redacted]
Ron Lane	**Billing Lead**	[redacted]	[redacted]
Sandra Sheppard	Secondary	[redacted]	[redacted]
Jim Wiseman	**Meter Reading Lead**	[redacted]	[redacted]
Marcus O'Keefe	Secondary	[redacted]	[redacted]
Jim Wiseman	**Technical Support Lead**	[redacted]	[redacted]
Murray Collier	Secondary	[redacted]	[redacted]
Rick Smith	**Revenue Metering and Quality Assurance Lead**	[redacted]	[redacted]
John O'Reilly	Secondary	[redacted]	[redacted]

DIMT Support Roles and Contact Details

Name	Role	Tel: Mobile	Tel: Home
Erin Squires	**Corporate Communications**	[redacted]	[redacted]
Glen Whiffen	**Facility Management**	[redacted]	[redacted]
Simone Brown	**HR Support**	[redacted]	[redacted]
Elaina Janes	Secondary	[redacted]	[redacted]
IS Help Desk	**Information Systems**	[redacted]	[redacted]
Dean Parsons	Secondary	[redacted]	[redacted]
Network Center	**Network Services**	[redacted]	[redacted]
Shane LaCour	Secondary	[redacted]	[redacted]

2.1 Department Contact List

In the event of a disaster and teams need to be contacted CS manager/supervisor will follow the imbedded call tree to notify our team members.

Customer Service
Call Tree_Oct2014.pc

2.2 Department Incident Management Team Meeting

If a disaster or another event occurs that may cause disruption to the business all members of the DIMT team will meet in person for a meeting. In the event that we are unable to gain access to Hydro Place our DIMT will meet in alternate meeting location or use a conference bridge.

2.3 Alternate Meeting Coordinator Sites

A list of alternate meeting coordinator sites is maintained in the Hydro Place DRP. In the event that Hydro Place is not accessible the Customer Service team will rely on Facilities Management (see contacts above) to procure a meeting location.

2.4 Conference Call Details

In the event of a significant disruptive incident the conference bridge will be open during the duration of the incident with regular schedule updates provided.

Dial In – [redacted]
Passcode – [redacted]
Host Passcode - [redacted]

3. Business Recovery Actions

The table below identifies the recovery action list that is required to restore Customer Service operational business services

ACTION
WHEN THE INITIAL CALL IS RECEIVED
The person taking the BCP initial call should gather all known facts: ● Location and time of the incident. ● Where staff are assembled, if during business hours. ● Scope and severity of damage, if known. ● Any known impacts, e.g. no site access ● Status of all response activity.
Advise DIMT Incident Commander or Secondary if the initial call was taken by another person.
NOTIFY THE DEPARTMENT INCIDENT MANAGEMENT TEAM (DIMT)
Identify the most appropriate meeting venue and confirm its availability and accessibility if out of normal business hours.
The DIMT Incident Commander or Secondary to arrange a time for the initial DIMT meeting.
The DIMT Incident Commander or Secondary to contact other DIMT members and provide briefing, time and location of initial team meeting. NOTE: Minutes must be kept of all DIMT meetings
DIMT team administration ● Check roles are assigned and understood. ● Determine DIMT working times, and if required, arrange shift coverage through all members. ● Determine the best form of communication based on available facilities and services. ● Agree to checkpoint meeting frequency and use of conference calls. ● Agree to a schedule of status/progress reports from recovery teams to the DIMT and reporting to CERP team and/or VP of Corporate Communications ● Arrange hotels, catering, etc.
Engage Hydro Place Facilities Management on alternate work locations, workspace setup, etc.
Contact Information Systems (IS) on computer setup and Network Services on phone setup

ACTION
If required, work with Corporate Communications to complete communications plan to internal and external audience and stakeholders.
SCENARIO - SITE NOT AVAILABLE
Assess the situation and impact to business.
Activate Closed IVR Message. Outage Calls will overflow to ECC.
Notify all supervisors and activate CS call tree.
Try to determine length of time that the site will be unavailable.
Identify key offline processes and functions that need immediate attention.
SCENARIO - PEOPLE NOT AVAILABLE
Assess the situation and impact to business. (Is it a pandemic?)
Activate Closed IVR Message. Outage Calls will overflow to ECC.
Notify applicable supervisors, staff and other stakeholders.
Try to determine the time CS will be without resources, level of resources required, etc.
Re-route calls where applicable as this will vary by type of call.
Identify key offline processes and functions that need immediate attention.
SCENARIO - TECHNOLOGY OR POWER NOT AVAILABLE
Assess the situation and impact to business.
Activate Closed IVR Message. Outage Calls still overflow to ECC.
Notify applicable supervisors, staff and other stakeholders.
Try to determine the time CS will be without power or technology.
Re-route calls where applicable as this will vary by type of call.
Identify key offline processes and functions that need immediate attention.
SCENARIO - SITE DESTRUCTION (IMMEDIATE ACTIONS)
An event of this magnitude will be managed by the Corporate Emergency Response Plan(CERP)
Link to CERP online documentation - http://grid/CorporateIntranet/Safety/SafetyIntranet.nsf/0/8E693C940FC64548A32578780063B4B7/$file/CERP-V1.6%20.pdf?OpenElement

4. Communications

It is important that a consistent message is provided for distribution to our staff, customers, media and other stakeholders. The Corporate Communications team will be responsible for all external communications and will direct members of the CS DIMT on the communications protocol for internal communications. A member of the Corporate Communications team will be an extension of the CS DIMT and be involved with planning and communications.

4.1 To CS Staff

CS Staff must not speculate on possible outcomes from the incident. Communication with staff will be via their supervisor or manager.

In addition to the Customer Service Manager, staff will also be able to get updates via the employee information line at Hydro Place, which is 709-737-1401.

4.2 To Public/Customers

Keeping customers and the public updated pro-actively informed is vital to maintaining confidence. Our Corporate Communications Team will be responsible for these communications. The protocol for these communications is detailed within Hydro's Emergency Communication plan. Corporate Communications will follow our normal guidelines and be communicated via local media, social media and other applicable streams.

4.3 Media

There may be media interest in the incident, to ensure a consistent message please refer all questions to the Corporate Communications Team. The protocol for these communications is detailed within Hydro's Emergency Communication plan

4.4 Other Stakeholders

Depending upon the situation communications maybe required for other stakeholders (i.e.: regional offices, Government, etc.) Each situation should be reviewed in consultation with Corporate Communications. The protocol for these communications is detailed within Hydro's Emergency Communication plan.

5. Service Recovery

This section contains information on the arrangements that will be required to continue service if Hydro Place is not available.

5.1 Alternate Work Location

This will be determined and outlined in the overall Hydro Place site Disaster Recovery Plan.

5.2 Workspace Recovery

CS will need to secure office space that can accommodate our business needs for both short and long term disruption. Supervisors/Manager will have laptops. CS will require 6 workstations for call center and 3 for billing staff. CS will need computers and phones for each work station. Workstations will require connectivity to Hydro's IT network and the phones have to be linked to the Customer Service toll free number.

5.3 Work Methods/Procedures

Attached is a list of work process for each of the respective functions. The details for each process are located on the GRID which is on Hydro's network.


List of Processes_Oct2014.p

6. IT Business Continuity and Recovery

This section describes the IT infrastructure required for the Customer Services department and its functions and would be used in the event of a business continuity incident.

It should be noted that the Customer Service Department is dependent on other internal service providers to ensure equipment and infrastructure is restored to deliver service to Hydro's customers. Network Services are able to provide phone service to the Customer Service Department within 12 hours to allow Customer Service Representatives (CSR) the ability to answer customer calls. Information Services (IS) are working toward a three day restoration period for their own infrastructure. As a result of growth in the organization it could take longer than three days for some services to be made available to the Customer Service Department, thus this could have negative impacts on service delivery to our Customers.

6.1 Voice Overview

Network Services will be responsible for the telephone switch, IVR, call routing and CTI environment that handles calls for inbound phone calls. The CS requirement is that our toll free number (888-737-1296) be switched to our alternate location to ensure our Call Center is opened.

Depending on the incident and expected outage duration, CS may place an upfront message on IVR - providing information about situation, anticipated recovery and instructions to caller.

6.2 Systems Overview

Attached is a detailed list of system requirements for each of the roles identified within our CS department.

Desktop Requirements_Oct20

6.3 Network and Data Overview

All data and documentation for CS is either stored on the H: drive or the GRID. Access to both is critical for CS to perform its functions.

7. Support Services

Emergency support is available from many of internal departments and some external sources. This section highlights some services that would be available.

HUMAN RESOURCES

- Provide HR support to supervisors/managers.

CORPORATE COMMUNICATIONS

- Gather information to produce internal/external communications.
- Communication of consistent messages to staff, public, media, etc.
- Maintain internal/external communications channels.

FINANCE & PROCUREMENT

- Assistance with purchasing if required

FACILITIES

- Assist with alternate office facilities.
- Liaison with IT functions for data communications and telephony installation.

8. Appendices

8.1 Appendix A - Hydro's Outage Communication Protocol

This document provides the Outage Communication protocol for managing unplanned power outages. This document focuses on the expected communications from the beginning of the outage to the end of the event.

This document is also located at H: Customer Services\Business Continuity Planning

8.2 Appendix B - Checklist for Critical Weather Event

This document provides an overview of the process to follow in the event of a critical weather event. This is intended to be used by Customer Service leadership team and is a guide on what steps to follow to prepare our Customer Service team for a critical weather event. Contained in this document are steps to invoke the IVR Bypass if we had to reopen the Call Center.

This document is also located at H: Customer Services\Business Continuity Planning

8.3 Appendix C - BCP Testing

As a part of our ongoing DR/BCP planning CS will undergo semi-annual testing to ensure our plan continues to meet our department requirements. As these test are performed the scenarios used and results will be populated in this section.