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Legislative Committee on  
Administrative Rules  
115 State Street  
Montpelier, VT 05633

Re: Rule Governing Outage Reporting Requirements for Originating Carriers  
and Electric Power Companies

Dear Committee:

Please accept this letter on behalf of Green Mountain Power (“GMP”) with respect to the proposed Rule Governing Outage Reporting Requirements for Originating Carriers and Electric Power Companies.

GMP appreciates efforts to identify gaps in 911 service – the safety of Vermonters is of number one importance to GMP, and to the extent that providing outage information is helpful, we are happy to provide that information. We have a couple suggestions to ensure that implementation of the Rule is efficient and useful.

First, the proposed Rule calls for reporting the addresses of outages. GMP suggests modifying the Rule to require identification of a street or section of a road, rather than each specific customer address, in order to protect customer privacy while providing enough detail to accomplish the purpose of the Rule.

Second, GMP suggests that the Rule include a provision for waiver or modification of the reporting requirements by the 911 Board in the future, if appropriate. For example, if the 911 Board determines that the reports submitted are not beneficial to the purpose of the Rule, or that less frequent reporting would be helpful, discretion to address those scenarios within the Rule itself could prove useful. For the same reason, GMP suggests that the 911 Board report annually with regard to how the information being provided in the outage reporting is being used and how it has proved helpful, and that consideration be given to adding a sunset provision in the Rule, where these reporting requirements would expire if legislative or administrative action is not taken. This approach could prove efficient for utilities and the 911 Board, should experience demonstrate that the required outage reporting does not prove useful in accomplishing the purpose of the Rule.

Thank you for your consideration, and please let me know if I can provide you with additional information.

Sincerely,

*Robert Dostis*

Robert Dostis  
Vice President of Stakeholder Relations  
cc: Barbara Neal, Executive Director, Vermont Enhanced 911 Board