File G.O. 166

Mountain Utilities

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October 31, 2008
California Public Utilities Commission
Energy Division
505 Van Ness Avenue,
San Francisco, CA 94102

Re: General Order 166 response for the period ending June 30, 2008

Attention: Messrs. Brian Schumacher and Werner Blumer

Dear Sirs:

Mountain Utilities (MU) is the smallest electric utility subject to the Commission's jurisdiction. It is therefore subject to requirements of the General Order 166 (GO), which includes compliance with the following standards:

- 1. Prepare an emergency response plan and update the plan annually.
- 2. Enter into mutual assistance agreements with other utilities.
- 3. Conduct annual emergency training and exercises using the utilities emergency response plan.
- 4. Develop a strategy for informing the public and relevant agencies of a major outage.
- 5. Coordinate internal activities during a major outage in a timely manner.
- 6. Notify relevant individuals and agencies of an emergency or major outage in a timely manner.
- 7. Evaluate the need for mutual assistance during a major outage.
- Inform the public and relevant public safety agencies of the estimated time for restoring power during a major outage.
- 9. Train additional personnel to assist with emergency activities.
- Coordinate emergency plans with state and local public safety agencies.
- 11. File an annual report describing compliance with these standards.
- Be subject to a restoration performance benchmark for major outages (Over 500,000 customers).
- Be subject to a call center performance benchmark for major outages (Over 500,000 customers).

In accordance with Standard 11, Mountain Utilities (MU) is enclosing its 2008 Annual Report. In particular, MU's updated Emergency Response Plan (PLAN), which is required by Standard 1, is enclosed for the use of the Commission and its staff.