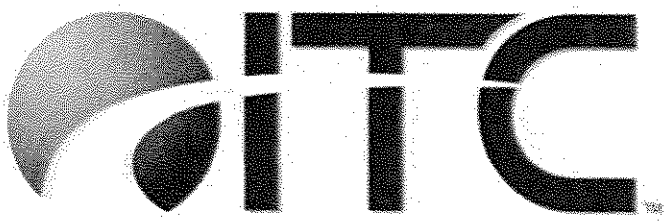
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Joint Application of Entergy Arkansas, Inc., Mid South TransCo LLC, Transmission Company Arkansas, LLC and ITC Midsouth LLC for Approval of Transfer of Assets and Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions	))))))))	File No. EO-2013-0396

EXHIBIT JEJ-10

DISASTER RECOVERY PLAN



ITC Holdings Corp.

Disaster Recovery Plan

Version 003
Effective Date 8/10/10

Table of Contents

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Introduction

On October 16, 2001, a Presidential Executive Order was signed requiring protection against the disruption of operation of information systems that are critical to protect the people, economy, essential human and government services, and national security of the United States. The protection mechanisms implemented are to be designed to ensure that any disruptions that occur are infrequent, of minimal duration, manageable, and cause the least damage possible.

ITC*Transmission*, Michigan Electric Transmission Company, and ITC Midwest (wholly owned subsidiaries of ITC Holdings Corp., hereafter referred to as "ITC") operate, maintain, and invest in electrical transmission infrastructure to enhance system integrity and reliability, and to relieve transmission constraints. ITC is regulated by the Federal Energy Regulatory Commission (FERC) and transmits electricity from generating stations to local distribution facilities in a number of Midwestern states.

The company depends heavily on a properly functioning information network, which includes the data flow between data centers in Ann Arbor and Novi, Michigan, and in Cedar Rapids, Iowa, and their associated substation locations. Without a functioning telecommunications system, network access, and proper business data, ITC cannot meet customer needs or regulatory requirements.

Due to the critical nature of ITC's business, the loss of certain technology or facilities introduces the risk that a serious disruption of power to millions of people in its service areas could occur. This Disaster Recovery Plan (hereafter referred to as "the Plan") is designed to mitigate that risk by providing the processes and procedures needed to recover the critical business functions affected by a disaster.

Executive Summary

Document Organization

The Plan is organized into seven sections: Purpose, Scope, Definitions and Assumptions, Plan Overview, Disaster Recovery Procedures, Business Continuity Procedures, and Attachments.

The first three sections provide background information on reasons for the plan, its intended functions, and the assumptions used in formulating plan actions. These sections also describe the philosophy and approach used for Disaster Recovery Planning at ITC, as well as the Business Impact Analysis used in producing this Plan.

The Plan Overview section describes the disaster recovery organization, facilities, initiating events, implementation, necessary communications, and data continuity requirements. It also describes critical path actions, including general disaster recovery and business continuity plan actions, and the process for returning to normal business operation.

Disaster Recovery Procedures in Section 5 provide detailed plan implementation steps, disaster response actions by work group, response flowcharts, emergency facility activation details, and disaster communications guidelines.

Business Continuity Procedures in Section 6 include actions necessary to maintain business functions using alternate facilities and equipment for extended periods during restoration of damaged facilities, equipment, and systems.

Work tasks in the Disaster Recovery and Business Continuity Procedures sections include the steps required to implement these processes, including assessing the damage caused by an event, declaring a disaster, preparing the Alternate site(s), and implementing actions to recover the affected business functions. Actions described in these sections and in Attachment 1, CIP-084 Critical Asset Recovery Plan, provide the steps necessary to restore the Information Technology (IT) infrastructure, ensuring the company's ability to operate and control its Critical Assets, as well as supporting recovery of other important business processes.

The Plan attachments include Critical Asset Recovery procedures, detailed descriptions of disaster response team roles and responsibilities, emergency facilities, emergency communications, personnel assignments, supporting procedures, damage assessment, and other information to be used during disaster recovery and business continuity plan implementation. In addition, Attachment 13, ITC Midwest Disaster Recovery Addendum, incorporates response information specific to the ITC Midwest (ITCMW) organization and facilities, and is designed to be used as part of, and in conjunction with, disaster response and business continuity procedures described in the main Plan and its other attachments, as applicable to ITCMW.

Personnel Requirements

Several major groups are necessary for proper implementation of the Plan, including:

- The Emergency Management Team (EMT).
- Disaster Response Teams / Task Forces.
- Departmental Work Groups.

The EMT has the overall responsibility for implementing the Plan and managing disaster response and recovery efforts by coordinating the actions of:

- Disaster Response Teams during initial and follow-up disaster response activities.
- Departmental Work Groups during extended operation under Business Continuity Procedures.

Michigan team details can be found in Attachment 2, Disaster Management and Response Team Descriptions, and Attachment 3, Business Continuity Plan Roles and Responsibilities. ITCMW team composition information is located in Attachment 13, ITC Midwest Disaster Recovery Addendum.

Disaster Recovery Plan

1. Purpose

The purpose of the Disaster Recovery Plan is to provide a mechanism for restoration of critical, essential, necessary, and ancillary business processes to ensure continuation of services to ITC customers, protect stakeholder interests, and satisfy regulatory requirements following a disaster. It provides direction on disaster preparation and response, as well as management of safe, effective disaster recovery efforts. The Plan describes restoration of the IT infrastructure supporting "critical" business processes within sixty (60) minutes, and "essential" business processes within twenty-four (24) hours. The Plan also provides guidance necessary to restore the IT infrastructure supporting

"necessary" business processes as soon as possible after the initial twenty-four (24) hours of the disaster recovery effort, and to subsequently restore "ancillary" business processes.

2. Scope

This Plan is written for the company's major infrastructures, including the Headquarters building, Operations Control Room (OCR), and data center in Novi, Michigan, the Backup Control Room (BCR) and data center facility in Ann Arbor, Michigan, the two primary ITC Midwest business facilities in Cedar Rapids and Dubuque, Iowa, and the company field locations associated with each. It provides the guidance necessary to expedite recovery of systems, applications, and other resources required to restore the critical, essential, necessary, and ancillary business processes supported in those locations (see NOTE below).

In addition, this Plan addresses recovery from a catastrophic event of natural or man-made cause which results in the partial or complete blackout of the Bulk Electric System. Since the highest priority of ITC staff during a system emergency situation is to protect the transmission system and restore service while ensuring public safety, use of the Plan in conjunction with the System Restoration Plans developed by Operations for transmission system recovery provides an additional tool for management of these events.

The Plan should be used, as necessary, for disaster management and business continuity guidance in response to short-term events, or during extended periods for which major infrastructure restoration efforts are required.

NOTE: This document primarily addresses the effects of disasters on the Novi, Michigan Headquarters facilities, and/or either of the primary business locations in Cedar Rapids and Dubuque, Iowa; however, it assumes continued availability of alternate work locations and recovery sites for disaster response and business continuity work. In the event that one or more of the alternate facilities, but not the Novi facility in Michigan or the Cedar Rapids and Dubuque facilities in Iowa, is affected by a disaster, actions must be initiated as soon as possible to either restore the affected location(s) or make alternate work site arrangements in order to regain the full disaster response capabilities described in this Plan.

3. Definitions and Assumptions

Definitions

Disaster

A "Disaster" is defined as a man-made or natural occurrence that disrupts the ability of the company to perform its critical business functions. The disruption may include the loss of personnel, information, or property. A disaster may be declared when the loss of any of these items prevents the company from operating its business and necessitates immediate corrective actions. A disaster may include a complete system blackout.

Crisis

A "Crisis" is defined as a short term disruption of service or business functionality. A crisis can include an accident, an incident of work place violence, a labor dispute, lawsuit, or an instance where the company is cited for a regulatory violation. Such situations may not initially be deemed a crisis, but do

pose a risk of increasing in intensity to the point where they may come under close media scrutiny and result in damage to the company's public image or its finances. A crisis differs from a disaster in that during a disaster, physical damage is done to property, equipment, or personnel.

Business Processes

To ensure the company's ability to satisfy the goals of this Plan, ITC commissioned the performance of a Business Impact Analysis (BIA) that identified the most important processes necessary to sustain its business. The analysis was intended to support disaster recovery planning efforts, and to build upon ITC's strategic initiative to protect its critical business processes. To prioritize disaster restoration efforts, the BIA identified the four classes of business processes defined below:

Critical Business Processes

Business processes which, if lost, could cause a major impact to the survival of the company, and potentially violate regulatory requirements. Critical business processes relate to operation of the Bulk Electric System and must be restored within sixty (60) minutes of a disaster in accordance with North American Electric Reliability Corporation (NERC) requirements. In order to meet NERC requirements, ITC maintains a redundant and automated failover system between data center locations in Novi, Michigan and Ann Arbor, Michigan.

Essential Business Processes

Business processes important to the revenue generation and profitability of the business. These processes must be restored within twenty-four (24) hours of a disaster.

Necessary Business Processes

Business processes used as part of normal operations but can wait for 24 -48 hours before they are restored following a disaster.

Ancillary Business Processes

Business processes that are important to the long-term management of the organization, but are not required for satisfying customer or regulatory requirements within forty-eight (48) hours following a disaster.

Assumptions

The Plan is based on the validity of the assumptions listed below, and a worst-case disaster situation is assumed; however, the Plan can also be activated and used effectively in less than worst-case scenarios.

Disaster

- A disaster will be declared and data processing will be restored at the recovery site when an outage is expected to exceed recovery time objectives for critical processes.
- Plan copies will be available, as needed, to the necessary personnel at the necessary locations.
- The disaster occurs at the worst possible time for business.
- All records, files, and materials at the affected location have been destroyed.

- The disaster is localized to the Novi, Ann Arbor, Cedar Rapids, Dubuque, or specific field facility geographical areas.
- One, but not both, of the Novi and Ann Arbor buildings in Michigan, or Cedar Rapids and Dubuque buildings in Iowa, may be destroyed or is otherwise inaccessible.
- The facilities, as well as the data center, have been affected by the disaster situation.
- All equipment and communication lines in and out of the affected site have been destroyed.
- For a transmission system disaster, the entire system in Michigan has been de-energized and external interconnections are not available.
- Those who initially discover the disaster will notify ITC management and the proper civil authorities such as police and fire departments.
- The initial observer, his/her supervisor, or the civil authorities will dispatch emergency medical assistance to the disaster site as required.
- The Emergency Management Team (EMT) Communications Lead will coordinate communication to media, staff, and vendors during the recovery effort.

Personnel

- The Plan is designed to be implemented by personnel who are familiar with the functions and operations of the company. Personnel from other ITC locations may be available to aid in the recovery efforts.
- At least the minimum number of personnel necessary for Plan implementation can be notified of the disaster and report to the affected site(s) and the recovery facility to perform critical damage assessment, processing, recovery, and restoration activities.
- Personnel can get to the recovery facility; transportation in the local area of the recovery facility to be used has not been affected other than delays resulting from inclement weather.
- Damage assessment deadlines are relative to the arrival time of the personnel at the scene to account for varying travel times resulting from weather, distance, and accessibility.
- Personnel participating in the recovery effort have the technical skills necessary to complete their recovery functions.
- Personnel and organizations which support ITC processes outside of Novi and Ann Arbor for Michigan events, or Cedar Rapids and Dubuque for ITCMW events have not been affected by the disaster.

Recovery

- An alternate facility for personnel to perform the recovery operations has been established in advance.
- The recovery facility has the necessary power and Uninterruptible Power Supply (UPS) capacity to support the infrastructure.
- The recovery facility has telecommunications and Internet connection service established in advance.
- All recovery equipment will be properly powered and wired. The recovery facility will have the appropriate number, lengths, and types of cabling or the raw cable materials necessary to re-establish all systems, if required, to ensure continuity during disaster recovery.
- All configurations and settings for infrastructure devices are completely documented and can be duplicated at the recovery facility, or applicable field location.
- The recovery facility has pre-established connections to the ITC core Wide Area Network (WAN) accessing both Novi and Ann Arbor facilities. These connections will facilitate all communications from the recovery facility network to all other ITC networks.

- The recovery facility has the proper environmental controls for the servers to function properly.
- Off-site storage of backup media and other materials survives the disaster and the necessary information is readily available to the recovery facility.
- An adequate supply of supplies for thirty (30) days of business is stored off-site and readily available to the recovery facility.
- Recovery will be performed in accordance with approved departmental and Disaster Recovery Plan procedures.
- Entities external to the company, such as customers, vendors, government agencies, and others, will be reasonably cooperative during the recovery period.

4. Plan Overview

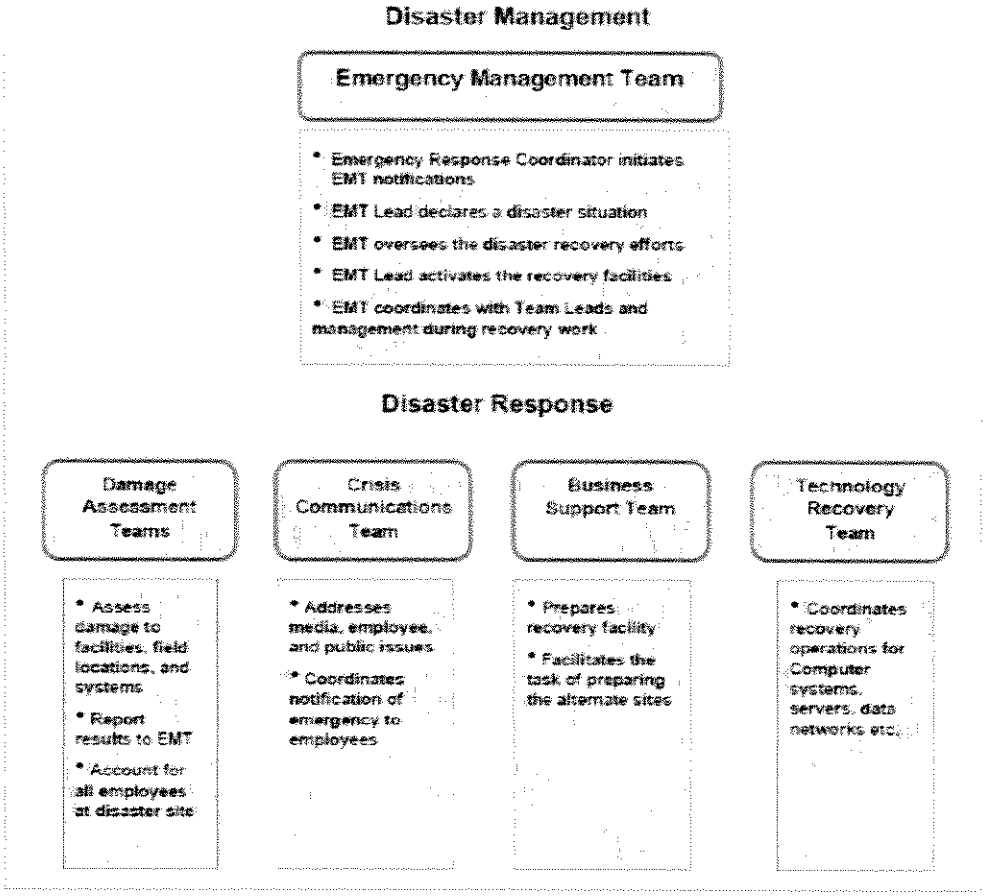
Plan Initiators

The Plan may be implemented as the result of disaster declarations due to weather-related events, physical attacks, Bulk Electric System disturbances (including those on ITC systems or on interconnected systems that affect ITC), and cyber attacks. The Plan may also be initiated anytime management feels that Plan initiating conditions may occur, or in preparation for uncertain events or conditions.

Disaster Recovery Organization

Attachment 2, Disaster Management and Response Team Descriptions, describes the teams involved in disaster response and recovery in detail. The disaster recovery organization is structured to provide the necessary management and response for any of the events addressed in the Plan. The Emergency Management Team (EMT) is responsible for managing all response and recovery efforts, and relies on four disaster response teams to implement disaster recovery strategies, while the EMT coordinates all activities. The four Disaster Response Teams are: the Damage Assessment Team (DAT), the Technology Recovery Team, the Crisis Communication Team, and the Business Support Team. The chart shown below summarizes the organization and the general responsibilities of each group involved.

Disaster Recovery Organization



See Attachment 13, ITCMW Disaster Recovery Addendum, for detailed information on ITCMW emergency management and response teams.

Disaster Notification

Initial response to emergencies or other incidents at ITC facilities will be managed using the applicable corporate or departmental procedures. As events escalate to the "disaster" level, personnel identifying potential Plan initiating events will follow the notification process in Section 5, Disaster Recovery Procedures. In general, the disaster notification process will be initiated by the person(s) or entity that first becomes aware of a Plan entry condition. The Security Command Center should be made aware of the situation. SCC will then notify the Emergency Response Coordinator (ERC) who will immediately notify the Emergency Management Team Lead and activate the Damage Assessment Team(s). The EMT Lead will direct notifications of other EMT members and will contact the CEO, and also make the determination to activate the rest of the call tree as necessary.

Disaster Declaration and Response

Following notification of a disaster by the ERC, and review of initial Damage Assessment Team results (expected within one hour of DAT arrival, and preferably within one hour of the event), the EMT Lead will make the disaster declaration, and direct implementation of the Plan. If the available information is not sufficient for Plan activation, the EMT Lead will await more detailed information from the Facilities and/or Field Damage Assessment Team(s) (DAT) to determine the impact of the disaster. If damage assessment information is then sufficient for Plan activation, the EMT Lead will make the disaster declaration and implement the Plan.

Disaster declaration and subsequent approval to initiate the Plan come from the Emergency Management Team Lead (the Chief Operating Officer) or the Emergency Response Coordinator (Vice President - Operations) if the Chief Operating Officer (COO) is not available. In the absence of both the COO and ERC, any other member of the Emergency Management Team may activate the Plan, if necessary.

When detailed information on damage to facilities, technologies, and business processes is available, the Facilities Damage Assessment Coordinator will make a recommendation to the EMT as to whether offsite recovery facilities should be activated. Based on this recommendation and the information collected by the DAT(s), the EMT Lead will make the decision for the type of disaster response.

Disaster Information Releases

The Crisis Communication Team will coordinate all disaster communications with the EMT, and is responsible for all public presentations to the news media including status updates, press releases, casualties, and injury specifics. The Crisis Communication Team is also responsible for providing notification and updates to ITC staff throughout the event via the Emergency Hotline (1-866-860-1881).

Disaster Recovery Strategies

The company's disaster recovery strategy revolves around satisfying three main principles:

- Ensuring personnel availability.
- Maintaining critical technology.
- Providing procedural guidance for recovery and business continuity actions.

The Plan's disaster recovery strategy is designed to ensure network and internet connectivity for ITC's primary and/or backup locations within a reasonable amount of time following an event. To accomplish these goals, the Plan designates required response personnel and prioritizes the actions necessary for recovery of the systems, applications, and other resources required to restore critical, essential, necessary, and ancillary business processes at the affected locations. Services will be restored in order of importance based on Recovery Time Objectives (RTO's) using Section 5, Disaster Recovery Procedures, and maintained as described in Section 6, Business Continuity Procedures.

If a disaster results in a partial or widespread blackout of the transmission system, System Restoration Plans provide the strategies used by the Operations Control Room to recover and re-energize the affected transmission system(s).

Operations Data Strategy

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Operations Data Strategy

- If a disaster prevents the Novi facility from performing its critical functions, Operations will temporarily relocate to the Ann Arbor location.
- If the Novi Network is unavailable, a contingency/fallback procedure is in place whereby data clustering and mirroring is backed up at the Ann Arbor Warm Site.
- As an additional precautionary measure, daily backups of critical data are sent to an Iron Mountain offsite facility in Wixom.

Operations Control Room Recovery Strategy

The Operations Control Room (OCR) is staffed on a 24/7 basis. There are several pre-established processes in place to support disaster recovery efforts, including dual Transmission Management System (TMS) systems running in Novi and in Ann Arbor to provide maximum flexibility in how the system is recovered. The Senior Transmission System Coordinator (TSC) will coordinate with the ERC in determining facility status and the need to relocate OCR operations. The Senior TSC is also authorized to independently declare an emergency and initiate recovery of Control Room operations (only) at the Ann Arbor backup facility, if necessary. Notification of EMT members will occur in accordance with this Plan in the event of any emergency declaration.

- If Operations evacuation from Novi to the Ann Arbor Backup Control Room (BCR) is required, it can begin immediately, since the Ann Arbor facility is normally unoccupied. The Ann Arbor backup location is fully equipped and ready to operate in the event that the Novi Control Room is unavailable.
- As required by NERC, the Operations Control Room must record and log real time events for continuity and auditing. If the OCR is not accessible to retrieve this real time documentation, system events covering the period of inaccessibility must be recaptured. In anticipation of this need, the Ann Arbor backup TMS monitors and records all real-time events in parallel with the primary system in Novi. This enables relocation and recommencement of operations from the BCR and availability of all OCR real-time information in less than 60 minutes from the time the OCR is evacuated.

Voice Communications Strategy

- To minimize the impact of a phone line interruption, the Novi facility has an AT&T Sonet Ring setup consisting of two independent lines coming from two different locations that connect to the Novi communications system equipment only after the lines enter the facility.
- All critical telephone numbers for the ITC Novi location can be rerouted to the Ann Arbor facility phone switch. If the damage is limited to the Novi Voice Over Internet Protocol (VOIP) system, the VOIP will be repaired or replaced.
- Cell phones may be used, if service is available, as a temporary means of communications for OCR personnel during the relocation transition to the Backup Control Room in Ann Arbor, or vice-versa. Due to the lack of recording capability, however, no system operation communications (e.g. switching, tagging, system operating directions, etc) are to be conducted via cell phones during these transition periods.
- Satellite phones, where available, may also be used as an alternate means of communications. Satellite phone conversations between field locations and the Novi OCR or Ann Arbor BCR are recorded using the installed Novi and Ann Arbor recording systems, so operational communications for switching/tagging or other system operations can be conducted without restriction. For disasters affecting ITC Midwest, satellite phones are a

primary means of communication at field locations and throughout the ITCMW system when normal phone service and/or cell phone service are unavailable and are provided at all critical stations and facilities.

- If the Novi VOIP is unavailable, OCR personnel will utilize analog communications through the hard-wired (analog) power failure phones provided in the OCR. In the event that the primary VOIP and analog voice communication strategy are both unavailable, the Last Resort Voice Communications Strategy below will be used.

Last Resort Voice Communications Strategy (Michigan Only)

Under emergency conditions only, if neither VOIP nor analog phone systems are available, Michigan Public Service Communications System (MPSCS) radios may be used to communicate with local distribution companies, field operators and other key stakeholders. MPSCS radios can only communicate with other MPSCS radio locations, but might also be used as a relay for notification of disaster to state authorities or emergency services requests (ambulance, fire, etc.).

- The MPSCS is managed and operated by the Michigan State Police. There are numerous units throughout Michigan at key locations/substations. In addition, many members of management have a handheld radio, and many ITC vehicles are equipped with a unit. See Attachment 11 for a list of MPSCS phone locations and holders.
- MPSCS units are also installed in the Consumers Energy and Detroit Edison control rooms with limited talk groups. This functionality provides one common talk group to be used between utilities.

As an additional means of radio communication between the Consumers Energy and Detroit Edison control rooms and ITC, each of those companies has provided their own radio system equipment for use by ITC Operations personnel in both the Novi OCR and the Ann Arbor BCR.

LAN and Desktop Strategy

- Following a disaster declaration affecting the Novi facility, the LAN supporting the business units will be activated at the Ann Arbor facility. The appropriate client applications can then be opened to allow resumption of operations. All supporting peripheral devices such as network printers will be available on the LAN.
  - For events affecting the ITCMW facility in Cedar Rapids, network equipment will be set up in Dubuque to restore LAN and application functionality.
  - Events affecting Dubuque do not require any network changes, since the ITCMW network servers are located in Cedar Rapids.
- Relocating business unit teams to alternate locations will be performed as shown in Attachment 4, Emergency and Recovery Facilities, and Attachment 7, Alternate Work Site Plan. Similar information is provided for ITCMW in Attachment 13, ITCMW Disaster Recovery Addendum.
- Copies of all client software, licenses, and configurations as saved per the Back Up and Restoration Plan will be used for the restoration purposes.

Business Continuity Strategy

During any extended event affecting significant portions of the company's infrastructure, ITC must be able to maintain operation of its critical business functions. Section 6, Business

Continuity Procedures, and Attachment 13, ITCMW Disaster Recovery Addendum, describe how the critical business functions within the company will resume operation at alternate locations once networks and systems have been recovered. Business Continuity Procedures outline the staffing requirements, skill sets, backup resources, work space, and tools needed to expedite the transition to new work sites during restoration of damaged infrastructure.

Return to Normal Business Operation

The Disaster Recovery Procedures and Business Continuity Procedures will be used to maintain corporate business functions in operation to the greatest extent possible. As infrastructure restoration occurs following a disaster, a planned and controlled change in department and corporate operations will be used to return the company to its normal business functions and facilities as soon as possible.

Critical Path Objectives

The Business Impact Analysis identified the company's business processes and prioritized them by how quickly those processes must be restored. This timeframe is called the Recovery Time Objective (RTO) and represents the amount of time the company can tolerate an outage of a business process. The Expected Recovery Point (ERP) is the point at which data recovery is expected as defined by the ITC business process leads.

RECOVERY TIME OBJECTIVE (RTO)	
CRITICAL (<60 MINUTES)	
ESSENTIAL (< 24 HRS)	
NECESSARY (24-48 HRS)	
ANCILLARY (>48 HRS)	

The following table represents the RTO & ERP as requested by business process leads, in priority order, for the critical business processes covered in the business impact analysis. Recovery time objectives (RTO's) are expressed in business hours or days and Expected Recovery Points are expressed in hours.

Priority	Business Unit	Critical Business Process	RTO (hours/days)	ERP (hours)
1	Operations	Real Time Operating	60 min	< 24
2	Operations	Real Time Monitoring	60 min	< 24
3	IT & Facilities	Physical Security	24 hrs	< 24
4	Operations	Day Ahead Operational Planning	24 hrs	24
5	Engineering	Operational Support (Relay)	24 hrs	48
6	Engineering	Engineering Maintenance (Field Support)	24 hrs	48
7	Engineering	General Design	48 hrs	24
8	Engineering	Project Engineering	48 hrs	48
9	IT & Facilities	Data Exchange and Reporting	5 days	> 48
10	Accounting	Accounts Payable	5 days	> 48
11	Human Resources	Human Resources	5 days	24
12	Accounting	Property Taxes	5 days	24
13	Accounting	Payroll	5 days	> 48
14	Legal	Legal	5 days	> 48
15	Accounting	Financial Statements	10 days	> 48
16	Operations	Network Modeling	10 days	> 48
17	Engineering	Engineering Design (Relay)	10 days	24
18	Engineering	Supply Chain, Inventory & Procurement	15-20 days	> 48
19	Accounting	Accounts Receivable, General Ledger	15-20 days	> 48
20	Business Strategy	Community Relations	15-20 days	> 48
21	Operations	Long Term Studies	15-20 days	> 48
22	Finance	Treasury	15-20 days	> 48

5. Disaster Recovery Procedures

Operations Team

Since the Operations Control Room (OCR) is staffed on a 24/7 basis, it is highly probable that control room personnel will be the first to respond to most of the disaster/crisis event categories described below. Operations responses will initially be based on procedurally-required actions for any of these events if action is initiated by the OCR, and will be based on management directives for event responses not initiated by the OCR.

General Operations Team Actions – All Event Categories:

The OCR will immediately notify the Emergency Response Coordinator (ERC) of an event. Notification will include:

- Event description, including impact on system operation, expected changes, and immediate support required.
- OCR evacuation procedure status, if applicable.
- External notifications completed, and procedural actions taken.

If the OCR was not involved in initial event response and Plan implementation, OCR personnel will perform external notifications and damage assessment as directed by the ERC, and stand by for additional direction following Plan implementation.

During emergency conditions affecting transmission system reliability, including activation of this Plan, the Emergency Response Coordinator may direct suspension of the Federal Energy Regulatory Commission Standards of Conduct to ensure all necessary steps can be taken to prevent damage to system facilities/equipment, and to ensure continues system operation. Refer to procedure CMN-006, Standards of Conduct Violations, for details on the process and notifications required to implement a waiver to the Standards of Conduct.

On activation of the Plan, the Operations Lead will assemble with the EMT, and will determine the availability of additional personnel for performance of extended assessment, control, and recovery work.

Operations Control Room personnel will be directed to:

- Perform damage assessment as directed by the ERC/EMT, including evaluation of normal and backup computer systems necessary for system monitoring and control.
- Coordinate with the ULC Field Operations Lead and ITC Project and Design Engineering Field Damage Assessment representatives to assess system damage and determine necessary corrective actions.
- Provide event updates, including OCR evacuation status, as required.
- Verify and report updates to computer control and monitoring system availability.
- Update Operations Lead personnel of procedural actions taken, in progress, or anticipated.

Operations Engineering personnel will:

- Assist OCR personnel with damage assessment, as required.
- Provide engineering analyses of system events, outage impacts, and forecasted recovery actions.
- Coordinate with interconnected system and/or MISO engineering personnel as necessary to facilitate system restoration.

Since Operations Control Room personnel will remain focused on transmission system operations work throughout any type of disaster, they are not considered to be a part of the Damage Assessment Team. OCR personnel will, however, coordinate with Damage Assessment Team members and the Emergency Response Coordinator to ensure that the effects of a disaster on system operations and facilities are identified as soon as possible.

Field Operations and Restoration Team

Activation of the Field Operations and Restoration (FOR) Team

The Emergency Response Coordinator (ERC), OCR Senior TSC, ULC Senior Management or affected area ULC General Foreman can activate the Field Operations and Restoration Team. The initiating call to activate the FOR will go to Lee Ellis, Rod LeBeau (for ITCT or METC) or Wayne Kenniker (for ITC MW), in that order. ULC Management will determine the Field Operations and Restoration Team Lead. The FOR Team Lead will lead the conference call.

FOR Team Lead will determine extent of damage in affected area to evaluate:

- Need for a large scope conference call
- Resource requirements
- Operations / Restoration priority
- Public Relations/Community Relations needs

Conference Call Initiation Process:

FOR Team Lead will notify parties by use of following pre-established E-Mail distribution lists and by text message or phone as appropriate:

- **"Michigan Emergency Contacts"** for ITC*Transmission* or METC events
- **"Midwest Emergency Contacts"** for ITC Midwest events

In addition, each contact is responsible to notify his or her appropriate parties depending on the scope, extent of damage and areas affected.

Conference Call Agenda Items:

- Roll call by FOR Team Lead to identify those with direct participation in the call
  - Other participants need not be identified and are not expected or anticipated to participate unless they have something immediate to contribute
- Equipment / Lines affected and extent of damage
- Weather forecast / safety concerns or issues
- Restoration priority from Operations
  - Estimated Restoration Times
- Resources needed for restoration
- Material needs and location
  - Additional Vehicle / Equipment / Fuel needs
  - Hotel / Food arrangements if needed
- Community Relations / Media Relations / Stakeholder Relations involvement

FOR Team Lead will initiate the Plan, Begin Mobilization of Resources, Equipment and Schedule Subsequent Conference Calls.

Initiating Events

Initiating event categories include three general scenarios which may occur individually, or in any combination:

- Facilities or equipment have been damaged
- Facilities and equipment have been destroyed

- Personnel are unavailable for immediate disaster response

Potential response actions are dependent on the type of scenario involved and may vary widely, but should be initiated as expeditiously as possible to provide for prompt restoration of the facilities, equipment, and other assets affected by any of these events.

Weather-Related Events

Examples of weather-related events that may require activation of the Disaster Recovery Plan include:

- Ice storms
- Tornadoes
- Blizzards
- Thunderstorms
- Flooding

Weather-related events will, in general, necessitate minimal travel by backup personnel, management, and disaster response teams until conditions allow. The potential inability of responders to perform their assigned duties until weather permits safe transit should be considered when directing recovery work to ensure personnel safety during implementation of the Plan.

Physical Attacks

Examples of physical attacks that may require Disaster Recovery Plan activation include:

- Terrorism
- Sabotage
- Bomb Threats
- Direct physical attacks

It is essential to immediately involve ITC Security personnel in response to these events, and to request additional assistance, if required, from local law enforcement agencies as soon as possible.

Cyber Attacks

Cyber attacks that may require activation of the Disaster Recovery Plan include:

- Action to disable equipment necessary to monitoring and control of critical Bulk Electric System components.
- Attacks designed to disable the Operations Control Room (OCR), Backup Control Room (BCR), or systems/equipment critical to system restoration plans.
- Intrusion into, or takeover of, corporate computer systems performing system control or reliability-based data exchange.

Actions to control and recover from attacks on, or damage to, Critical Cyber Assets should be implemented in accordance with Attachment 1, CIP-084 Critical Cyber Asset Recovery Plan.

Disturbances on ITC System(s)

Disturbances resulting in partial or complete blackouts on any ITC system will be managed in accordance with Transmission System Emergency procedures and System Restoration Plans.

Disturbances on Interconnected Systems Affecting ITC

Interconnected System Disasters may include:

- System disturbances, including blackouts, on adjacent transmission systems that affect ITC.
- Physical or cyber attacks on interconnected systems that result in loss of control of interface components, telecommunications, or data exchange systems necessary for system reliability.
- Loss of critical equipment control that could affect ITC systems by an interconnected system entity.

Disturbances on interconnected systems that affect the ITC system operation will be managed in accordance with Transmission System Emergency procedures, and supported in accordance with Interconnection Agreements with the affected external system(s).

Management Directives

The Plan may be activated anytime at management discretion whether or not any of the above entry conditions have been satisfied. Examples of discretionary initiators include:

- Anticipation of possible initiating events.
- Desire to implement the Plan for managing specific business function failures or damage.
- Precautionary implementation of Plan procedures as a conservative action during events that are not expected to meet Plan entry criteria.

Disaster Notifications

If an outsider is the first person to find out about a disaster involving Novi facility and assuming the outsider notifies Novi police, Novi police that has the number to ITC Security Command Center will make the call to the Security Command Center. In the event that the Security command Center is unresponsive Novi police has Facilities Director, Joe Bennett's number to call.

Notifications to the EMT and the response team and other personnel will be facilitated through use of a basic "call tree" as indicated below

- Initiator will contact the Security Command Center (SCC) and notify them of the disaster.
- SCC will immediately contact the Emergency Response Coordinator (ERC).
- The Emergency Response Coordinator will promptly notify the Emergency Management Team (EMT) Lead.
- The Emergency Response Coordinator and EMT Lead will determine the method and timing for notifying additional members of the EMT.
- The EMT Lead will determine the appropriate time to communicate to the CEO.
- EMT members, or their administrative assistants, will contact their respective Team Leads / Department leads / Managers / Supervisors.

- Team Leads / Department leads / Managers / Supervisors will notify their respective team members
- The Crisis Communication Team will update the emergency hot line information and coordinate with the EMT to provide media, customer, government, regulatory, and vendor notifications, as well as providing instructions for employees who are not part of the disaster recovery effort.

The following table lists a basic call tree structure and must be used to the extent necessary:

Role	Primary Caller	Makes Calls to:	Back Up Caller
Disaster Information Receiver	Anyone	Security Command Center – (248) 380-2920	Anyone
Call Tree Initiator	Security Command Center	Novi Security (Bob Blickensdorf, Joe Bennett or Gregg Brandemihl	
	Novi Security (Bob Blickensdorf, Joe Bennett or Gregg Brandemihl	Elizabeth Howell, ERC	
Emergency Response Coordinator (ERC)	Elizabeth Howell	Jon Jipping, EMT Lead Erika Robinson, Administrative Assistant to Elizabeth Howell	Novi Security (Bob Blickensdorf, Joe Bennett or Gregg Brandemihl
EMT Lead	Jon Jipping	Joe Welch, CEO Administrative Assistant to CEO, Catherine Day Maria Beal, Administrative Assistant to Jon Jipping	Elizabeth Howell
Administrative Assistant to CEO	Catherine Day	Per instructions from EMT Lead/ERC call – - All of CEO's direct reports that are not on the EMT - All Executive Assistants that haven't been notified already including ULC representative Brenda Yaldo	Maria Beal
Administrative Assistant to Jon Jipping	Maria Beal	All EMT Members per instructions from the EMT Lead/ERC	Erika Robinson
Administrative Assistant to Jon Jipping	Maria Beal	All of Jon Jipping's direct reports	Jon Jipping
Administrative Assistant to Elizabeth Howell	Erika Robinson	All of Elizabeth Howell 's direct reports	Elizabeth Howell
Administrative Assistant to Linda Blair	Sandra Biggar	All of Linda Blair 's direct reports except for Denis DesRosiers	Linda Blair
Administrative Assistant to Denis DesRosiers	Diane Coskey	All of Denis DesRosiers' direct reports	Denis DesRosiers
Administrative Assistant to Gregory Ioanidis	Wanda Cassell	All of Gregory Ioanidis' direct reports	Gregory Ioanidis
Administrative Assistant to Tom Vitez	Virginia Roberts	All of Tom Vitez's direct reports	Tom Vitez
Administrative Assistant to Cameron Bready	Carol Ward	All of Cameron Bready's direct reports	Cameron Bready

Administrative Assistant to Daniel Ogrinsky	Denise Juras	All of Daniel Ogrinsky's direct reports except for Christine Mason Soneral's direct reports	Daniel Ogrinsky
Administrative Assistant to Christine Mason-Soneral	Linda Sweeney	All of Christine Mason-Soneral's direct reports	Christine Mason-Soneral
Administrative Assistant to Edward Rahill	Dorothy Golob	All of Edward Rahill's direct reports	Edward Rahill
Administrative Assistant to Lee Ellis	Brenda Yaldo	All Of Lee Ellis' Direct reports and whoever else from ULC that needs to be notified first	Lee Ellis

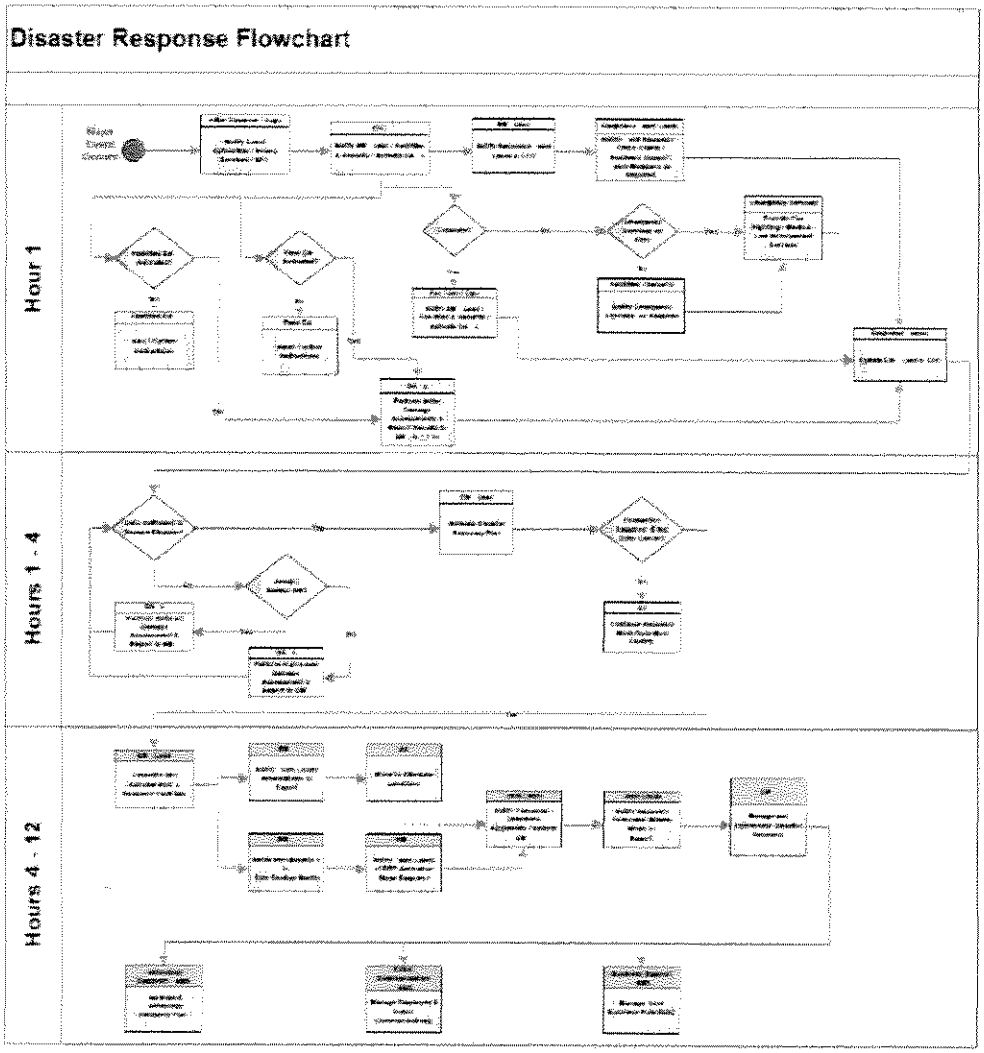
Refer to the ITC Organizational Chart on the DR shared drive for more information on organizational structure and for clarity on who calls who.

Updated personnel contact listings are maintained on the ITC network on the restricted access Disaster Recovery Shared drive for use in this Plan. The file is called Employee Information Spreadsheet MMDDYY.xls and is password-protected using the Disaster Recovery document password to restrict access.

Disaster notification and call tree detail for ITC Midwest is provided in Attachment 13, ITCMW Disaster Response Addendum.

Disaster Response

Response to the various initiating events will vary greatly depending on the physical areas affected, extent of damage, and effects on personnel. In all cases, response must ensure personnel safety and provide prompt action to restore important business processes as indicated in the flowchart below.



Required Actions

Required actions encompass the general responses indicated in the Response Flowcharts, as well as detailed procedural responses to the various initiating events described above, and should consider the following:

Weather-related events

Overall response to any of these events must consider:

- Implementation of actions required by Transmission System Emergency procedures, including coordination with interconnected systems and MISO as necessary to stabilize ITC system operation.
- Notification of the Emergency Response Coordinator and implementation of damage assessment actions, as required.
- Notification of the EMT Operations Lead to provide remote support as necessary until travel conditions allow reporting to the OCR, BCR, or an alternate location, if required.
- Evacuation of the OCR and relocation to the BCR if travel conditions allow; if not, notify operating personnel close to the BCR to report to the Ann Arbor facility and take over system operations as soon as possible.
- Relocation to a nearby facility and continuation of operations using laptop computers if travel to Ann Arbor is not possible. If neither control room is functional, request monitoring assistance, if possible, from Consumers Energy and Detroit Edison until ITC systems have been restored or until an alternate facility is available. Assistance may be requested from Alliant West for ITCMW disasters.
- Implementation of all available alternate communications methods if communications systems are affected, power failure phones, backup radios, satellite phones, and as a last resort, Michigan Public Service Communications System (MPSCS) radios.
- Notification of the Utility Lines Construction (ULC) on-call dispatcher to obtain estimates of personnel availability for field operations, if/when travel is possible.

If travel is not possible to enable support and management personnel to report to Novi, Ann Arbor, or an alternate location, the Senior TSC will act as the on-site disaster coordinator and will:

- Maintain communications with the ERC or an EMT member, as available, and direct the implementation of any actions deemed necessary until an EMT member is able to report for duty and implement the DRP.
- Document all damage assessment work and maintain a written log of all actions and damage assessment information for use by the EMT on arrival.
- Notify the ULC on-call dispatcher and request field assistance as necessary.

Physical attacks

In the event of a physical attack affecting transmission system control or data center facilities, perform the following actions, as required:

- Implement all applicable emergency procedures to ensure security and stability of the transmission system.
- Verify that Security is aware of the attack and is implementing necessary corrective actions per Security procedures.
- Notify the ERC and initiate damage assessment actions as directed.
- Relocate to Ann Arbor, if necessary. If neither control room is functional, request monitoring assistance, if possible, from MISO, Consumers Energy, and Detroit Edison until ITC systems have been restored or until an alternate facility is available.
  - Assistance may be requested from Alliant West for ITCMW disasters.
- Notify all interconnected entities and MISO.
- Notify the ULC on-call dispatcher and request field assistance as necessary.

Cyber attacks

If transmission system and/or control area operations are the target(s) of cyber attacks, the effects on operations may include inability to perform system monitoring and control functions, as well as inability to communicate those problems. To the extent possible:

- Implement all applicable emergency procedures to ensure security and stability of the transmission system.
- Notify all interconnected systems and MISO of the event and request remote monitoring of ITC systems, if possible.
- Verify that Security is aware of the attack and is implementing necessary corrective actions per Security procedures.
- Notify the ERC and implement control actions as directed.
- Initiate damage assessment actions to determine the effects of the attack on transmission system and control area monitoring and control systems, ITC network operation, building security systems, and external interconnected system networks.
- Relocate to Ann Arbor if Novi systems are affected and the BCR remains available, as directed by the Senior TSC. If neither control room is functional, request monitoring assistance, if possible, from MISO, Consumers Energy, and Detroit Edison until ITC systems have been restored or until an alternate facility is available. Assistance may be requested from Alliant West for ITCMW disasters.
- Notify the ULC on-call dispatcher and request field assistance as required.

Actions to control and recover from attacks on, or damage to, Critical Assets should be implemented in accordance with Attachment 1, CIP-084 Critical Asset Recovery Plan, in addition to the general actions shown above.

Bulk Electric System Disturbances

Disturbances on the Bulk Electric System, whether on an ITC system or an interconnected system affecting ITC, should be managed in accordance with the appropriate emergency operating procedures.

In general, the following actions may be required:

- Declaration of an "Emergency Black Light" condition by the Transmission System Coordinator (TSC).
- Notification of the Emergency Response Coordinator and potential activation of the Emergency Management Team, Emergency Operations Center, and all necessary DRP teams.
- Assessment of system damage as directed by the ERC or EMT.
- Relocation to the Ann Arbor BCR if the Senior TSC determines it to be necessary. If so, Operations Control Room evacuation procedures and backup control procedures will be initiated.
- Notifications of the "Emergency Black Light" condition to interconnected entities and MISO, along with requests for assistance, if deemed necessary by the Senior TSC.
- Notification of ULC on-call dispatch to send operators to designated Black Light Stations.
- Implementation of System Restoration Plan(s).
- Implementation of Disaster Recovery Plan actions based on damage assessments.

For interconnected system events, ITC actions will normally be those required to prepare for system damage that may result from the interconnected system problems and to provide any necessary support to the affected parties once the ITC system(s) operations are re-stabilized.

Plan Implementation

Emergency Management Team

The Emergency Management Team (EMT), led by the Chief Operating Officer, is responsible for declaring a disaster and managing the response and recovery effort throughout all phases of the disaster. The EMT is comprised of management staff, including the Emergency Response Coordinator, and functional lead representatives for: IT and Facilities, Operations, Engineering, Asset Management, Communications/HR, Financial, Legal, and Field Operations. A dedicated Administrative Support Task Force is also assigned to the team.

The EMT is responsible for activation of both the Emergency Operations Center and the Recovery Facility locations. The EMT also provides support and direction to all other Recovery Response Teams, and decides which personnel to activate based on the geographic location of the affected facility. Attachment 6, Work by Critical Path, should be used as a supplementary guide to disaster response by the EMT.

In tandem with the on-going efforts to recover business functions, the EMT is also responsible for maintaining Control Room Operations and managing all immediate support issues.

Detailed information on individual EMT member roles and responsibilities is provided in Attachment 2, Disaster Management and Response Team Descriptions. In general, members of the Emergency Management Team are responsible for implementing the following actions to the extent required to manage the event:

- Declare a disaster and activate applicable portions of the Disaster Recovery Plan.
- Assemble Emergency Management Team leaders and teams.
- Activate the Emergency Operations Center and notify the Recovery Facility Preparations Task Force of the intent to occupy the alternate work site(s).
- Provide guidance and oversight of any or all actions necessary to ensure fast restoration and recovery from a disaster.

Disaster Response Teams

The Disaster Response Teams perform the actions of restoring or recreating services during the recovery process. These teams execute the Plan and instructions provided by the Emergency Management Team. The four Disaster Response Teams are: Damage Assessment Team, Technology Recovery Team, Crisis Communication Team, and the Business Support Team.

Detailed information on individual Disaster Response Team member roles and responsibilities is provided in Attachment 2, Disaster Management and Response Team Descriptions, and Attachment 13, ITCMW Disaster Response Addendum, for ITC Midwest.

Damage Assessment Team

The Damage Assessment Team (DAT) consists of two separate sub-teams: the Facilities DAT and the Field DAT. The Facilities Damage Assessment Team (DAT) evaluates the level of damage to the ITC facilities in Novi or Ann Arbor in the aftermath of the disaster. The Field Damage Assessment Team, if activated, evaluates the level of damage to the transmission system infrastructure, and will focus on the assessment of damage to towers, lines, and field locations. Initial field assessments will most likely be initiated by Operations Control Room personnel as part of system emergency procedures.

The Damage Assessment Teams are comprised of a Facilities Damage Assessment Coordinator, Field Damage Assessment Coordinator, and personnel representing Technology, Facilities, Physical Security, Human Resources, Field Damage Assessment, and Safety.

Actions to assess damage to Critical Cyber Assets by both DAT's should be implemented in accordance with Attachment 1, CIP-084 Critical Asset Recovery Plan, Form F1, in addition to other damage assessment actions indicated below.

Facilities Damage Assessment Team actions include the following:

- Reporting initial findings on the extent of facilities damage to the EMT within the first hour following a disaster.
- Providing the Facilities Damage Assessment Coordinator with information necessary to complete the Damage Assessment Checklists for subsequent submittal to the EMT for review and evaluation within four hours of a disaster declaration.
- Providing additional damage assessment information to the Facilities Damage Assessment Coordinator for subsequent use in providing the EMT with recommendations for offsite recovery facility activation.
- Continuing assessment actions until a complete estimate is available of which facilities, systems, and equipment are salvageable and which are irreparable to allow a complete damage evaluation and formulation of necessary actions by the EMT.
- Coordinating with the EMT to provide information for media releases and other communications based on damage evaluations.
- Providing staff contact information to the EMT to aid in timely disaster response.
- Ensuring personnel safety during all damage assessment activities and providing status information to the EMT.
- Maintaining physical security of facilities, equipment, and systems to the maximum extent possible.

The Field Damage Assessment Team is comprised of the Field Damage Assessment Coordinator, Field Damage Assessment Representatives, and personnel representing ULC, Engineering Maintenance, Project Engineering, and Relay Engineering, as needed.

Field Damage Assessment Team actions include the following:

- Reporting initial findings on the extent of field location damage to the Field DAC for submittal to the EMT within the first hour after arriving at a damaged site following a disaster.
- Providing the Field Operations Lead on the EMT with information necessary to complete the detailed Damage Assessment Checklists for subsequent submittal to the EMT Lead for review and evaluation within four hours of a disaster declaration.
- Continuing assessment actions until a complete estimate is available of which field locations, associated facilities, systems, and equipment are salvageable, and which are irreparable to allow a complete damage evaluation and formulation of necessary actions by the EMT.

- Coordinating with the EMT to provide information for media releases and other communications based on damage evaluations.
- Providing ITC and ULC field staff contact information to the EMT to aid in timely disaster response.
- Ensuring personnel safety during all damage assessment activities and providing status information to the EMT.
- Maintaining physical security of ITC field locations, equipment, and systems to the maximum extent possible.

Technology Recovery Team

The Technology Recovery Team, led by the VP – IT and Facilities & Chief Information Officer (CIO), coordinates the recovery and support operations for the servers, personal computers, laptops, and data communications equipment. This team is comprised of four functional areas with corresponding leads: Corporate Network and Data Center Lead, TMS Lead, Financial/PeopleSoft Lead, and Field Technology Lead / Engineers.

The Technology Recovery Team actions include the following:

- Obtaining backup data from off-site storage, delivering it to the restoration site, and performing data restoration, if necessary, using the "Tape Backup and Restoration Process" on the DR shared drive.
- Obtaining the necessary hardware, software, and network equipment necessary to restore the critical servers and the network architecture.
- Restoration and testing of Transmission Management System equipment and applications.
- Restoration and testing of financial systems and applications.
- Ensuring that physical security systems are in place and functional at alternate data center and business office locations.
- Ensuring that IT-related systems in data center locations and field locations are functional.
- Notifying the EMT when recovery facilities are ready for employee use.

Actions to control and recover from attacks on, or damage to, Critical Cyber Assets should be implemented in accordance with Attachment 1, CIP-084 Critical Asset Recovery Plan in addition to the general technology recovery actions shown above.

Crisis Communication Team

The Crisis Communication Team, led by the Chief Business Officer (CBO), is responsible for maintaining relations with the outside world when a disaster arises by handling communications with news media, customers, partners, government officials, and employees. In addition, this team provides instructions for all personnel who are not a part of the disaster recovery effort. The team is comprised of three functional areas: Internal and External Communications, Legal, and Administrative Support.

Crisis Communication Team actions include the following:

- Prepare public, corporate statements regarding the disaster and the company actions taken.
- Coordinate with other internal teams regarding appropriate messages for customers, partners, and vendors.
- Communicate with state and local governments to support ITC disaster recovery efforts.
- Communicate with federal regulators and elected officials.

- Conduct media interviews, briefings, and phone inquiries.
- Monitor media coverage and public response to crisis.
- Maintain employee communications and provide direction as requested by the EMT.
- Continually update the employee Emergency Hotline.
- Provide legal advice pertaining to contracts, insurance, property, and real estate, etc. during recovery operations.
- Perform legal reviews of all planned internal and external communications.
- Assist in the notification and monitoring of regulatory reporting requirements during and following a disaster event.

Business Support Team

The Business Support Team is divided into three (3) separate task forces: the Recovery Facility Preparation Task Force, the Financial Support Task Force, and the Logistics Task Force. The team is responsible for ensuring that the recovery facility is ready for use. The Business Support Team Task Force actions include the following:

Recovery Facility Preparation Task Force

- Prepare for and coordinate occupation of the recovery facility, including providing utilities, furniture, telecommunications, equipment, and phone service, as required.
- Notify Crisis Communication Team and EMT that the recovery facility is ready for employees.
- Establish phone service as needed by other recovery teams.
- Coordinate site security with the physical security group.
- Notify the Technology Recovery Team when the recovery facility is ready for restoration of the data center.

Financial Support Task Force

- Provide any funds required to directly assist in the recovery effort.

Logistics Task Force

- Obtain any needed materials, equipment, or services as requested by the EMT and/or other task forces in preparation for Recovery Facility activation.
- Transport the Recovery Facility Preparation Task Force and any necessary equipment or items to the recovery facility.
- Order and deliver office supplies to the Recovery Facilities based on departmental requirements.
- Restore company internal mail and postal services at all Recovery Facilities.

Activation of the Emergency Operations Center

The responsibility for establishing an Emergency Operations Center (EOC) falls to the Emergency Management Team (EMT) Lead or, in the absence of the EMT Lead, the Emergency Response Coordinator. If both the COO and ERC are absent, any member of the EMT can activate the EOC. The location of the EOC is fluid, meaning that depending on the affected areas; the EOC may be located on the Novi campus, or the Ann Arbor location. Attachment 4, Emergency and Recovery

Facilities, describes the EOC locations. ITCMW EOC locations are described in Attachment 13, ITCMW Disaster Recovery Addendum.

Activation of a Designated Recovery Facility

The responsibility for directing activation of the designated recovery facility falls on the EMT Lead or, in the absence of the EMT Lead, the ERC. If both are absent, any other member of the EMT may activate the recovery facility. Damage to ITC field facilities, structures, and systems that leaves the Novi Headquarters and/or Ann Arbor facility intact will be managed from those locations, as appropriate.

Assuming the total destruction or inoperability of the Novi Headquarters or Ann Arbor facility in Michigan, and/or the Cedar Rapids or Dubuque facility in Iowa:

- Within four hours of the disaster, the EMT Lead, or an alternate, determines the prognosis for recovery of the damaged system(s) or area(s) at the affected location through consultation with the Damage Assessment Teams.
- If facility damage at the Novi Headquarters, Cedar Rapids, or Dubuque facility is estimated to take longer than 24 hours to repair or allow resumption of business operations, the EMT notifies the Recovery Facility Prep Task Force of management's intention to utilize alternate work sites. Attachment 4, Emergency and Recovery Facilities, contains more information about the pre-arranged recovery facilities in Michigan and Attachment 13, ITCMW Disaster Recovery Addendum contains Iowa facility information.

For less than worst-case disaster scenarios where relocation to the recovery facility may not be necessary, if damage is estimated to take less than 24 hours to recover, the EMT Lead may elect not to use some or all of the designated alternate work sites depending on the expected impact to ITC's business, and the event's effect on Critical Physical and/or Cyber Assets.

6. Business Continuity Procedures

This section of the Disaster Recovery Plan describes how critical business functions will resume functioning at alternate locations once company networks, information, and communication systems have been recovered.

Any information regarding contracts between ITC work groups and external entities, made to ensure business continuity in support of this Plan, must be maintained and available for reference in the restricted access Disaster Recovery shared drive on the ITC network. Each department Lead is responsible for ensuring that information regarding their vendors and any subsequent updates are provided to the Legal Department for incorporation in this document.

Alternate Work Site Plan

Since neither of the Michigan recovery facilities in Ann Arbor and Belleville can support a complete complement of personnel, an Alternate Work Site Plan (Attachment 7), has been established to provide detailed listings of alternate work locations and personnel assigned to each during an extended disaster recovery process. ITCMW recovery facilities and the associated Alternate Work Site Plan are described in Attachment 13, ITCMW Disaster Recovery Addendum.

To ensure a smooth transition from disaster recovery work to business continuity procedures, all work group Leads are responsible for pre-arranging facility access to alternate work locations, as applicable, for their staff members.

Departmental Procedures

During a disaster recovery effort, implementation of Business Continuity Procedures may be required to maintain business functions to the maximum extent possible and allow resumption of day-to-day operations. These procedures describe the actions necessary to support disaster recovery by functional group and provide a high-level process to help resume department functions once company systems, networks, and communications have been restored. Detailed descriptions of the work groups shown below, including strategies, resource plans, alternate work site needs, and other amplifying information are provided in Attachment 3, Business Continuity Plan Roles and Responsibilities. For ITC Midwest information, see Attachment 13, ITCMW Disaster Recovery Addendum. These procedures provide a working structure for the necessary activities until departments have returned to normal operation in a permanent facility with the full complement of staff.

All Departments

During Recovery:

During initial recovery efforts, the roles of all departments will be to:

- Coordinate with their EMT representatives/department heads, the EMT Lead, and the Emergency Response Coordinator to assist with disaster recovery efforts as described in Section 5, Disaster Recovery Procedures.
- All Managers/Supervisors with direct reports to contact their direct reports (both employees and contractors) to notify them of the disaster.
- Notify staff members when systems and networks are back in service, and when/where to report to work per the Alternate Work Site Plan.
- Contact critical vendors and/or contractors for assistance as described in current support contracts, if any.

Following Network and System Restoration:

Day 1

The first day after network and system restoration, the roles of each work group will include actions necessary to reestablish functionality and return to normal business to the maximum extent possible. To aid in that effort, each work group Lead will arrange a planning meeting with all, or a core team, of the group staff to:

- Ensure that all work group resources know what to do, how to communicate with each other, where to meet (if not co located), and how to coordinate tasks.
- Identify and prioritize current needs, other work in progress, and outstanding issues prior to the disaster to formulate an action plan for the group.
- Organize work, make assignments, establish schedules, and communicate that information to the work group staff.

- Notify other work groups how to communicate with the staff during the Business Continuity Plan transition.
- Implement contingencies if key staff is unavailable, or as work requires, including reassigning staff, providing access privileges to allow performance of key tasks, and so forth.

Business Strategy

Following network & system restoration: Days 2+

The Lead and Core Team will:

- Notify other Business Strategy staff when they should return to work and provide guidance on their priorities and activities, if not already done.
- Facilitate briefings and communications between members of the group.
- Determine whether a work-around process is required as the company resumes normal operation

Corporate and Financial Accounting

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Controller, in conjunction with Treasurer, will approve cash transfers/payments during recovery efforts.

Following network & system restoration: Days 2+

The Controller will:

- Oversee Corporate and Financial Accounting activities.
- Arrange for Accounting Department briefings and communications internally and externally, as appropriate.
- Direct notification of Corporate and Financial Accounting staff, internal ITC customers, and outside auditors regarding new phone/fax numbers when the Belleville offices are ready for use.
- Oversee resumption of staff activities.
- Determine whether a work-around process is required to process payments (outside of the disaster recovery process) as the company resumes normal operation.

To the extent necessary, accounting staff will manually record purchases, approvals, and tracking/payment of invoices.

Once Human Resources system inputs to the payroll processing system are restored, employee paychecks will again be processed normally. If necessary due to extended system unavailability, Accounting – Payroll may elect to pay employees based on their last regular paychecks and provide a "true-up" to those payments after complete system restoration.

Engineering Maintenance / Power Equipment

Following network & system restoration: Day 1+

- The Engineering Maintenance and Equipment lead will facilitate regular communications among Engineering staff, other work groups, and ULC regarding maintenance scheduling activities and coordination.
- Notify Maintenance and Power Equipment Engineers of the schedule for reporting to work at the Northeast Substation and assign work priorities.

Design Engineering

Due to its specialized area of expertise, the Design Engineering group has limited ability to assist with other work, but will provide recovery support to the maximum extent possible.

Following network & system restoration: Days 1+

The Design Engineering Lead will contact Black & Veatch and arrange for his group to work from their offices. Design Engineering Lead along with the document management resources will work from Ann Arbor. Black & Veatch will provide network access so the Design group members could VPN into the ITC network.

Project Engineering

Following network & system restoration: Day 1 +

- The Project Engineering Lead will notify Field Supervisors and Project Engineers to report to their alternate work sites.
- The Project Engineering Lead will facilitate a meeting with Principal Engineers to coordinate with Reed City (buyers, supply chain and warehouse), as well as ULC Dispatch/Field personnel, and the Operations Department regarding planned activities.
- Provide guidance regarding priorities and resumption of project activities.
- Identify any work-around procedures with Reed City, ULC or other groups if there is an interruption in connectivity or data access.

Relay Engineering - Relay Design / Relay Performance / SCADA

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Relay Engineering Lead will communicate recovery status and assistance needs to ULC and Hydaker-Wheatlake.

Following network & system restoration: Day 1+

The Relay Engineering Lead will

- Facilitate regular communications between engineering staff, other departments, ULC, and Hydaker-Wheatlake as staff works from the Northeast Substation.
- Provide direction and discuss work plans with the Senior Relay Design Engineer and the Senior Relay Performance Engineer to prepare work assignments for the remaining Relay Design and Performance Engineers.
- Notify Relay Design and Performance Engineers of the schedule for reporting to work at the Northeast Substation and Ann Arbor locations and assign work priorities.
- Communicate status and coordinate resources with the Director - Asset Management.

Days 3+

The Relay Engineering Lead will:

- Provide direction to Relay Design and Performance Engineers reporting for work at the Northeast Substation.

  Note: The Relay Design and Performance group may not need to report to work for several days following a disaster, depending upon the level of field work.

  The Relay Design and Performance group's work load following a disaster would primarily align with the level of active field work, which is largely driven by projects. This group maintains relay settings, often changed in real time, in CAPE/ASPEN and Asset Sentry, and can work off non-networked laptops to do studies while the ITC network is not available as long as the software key is available. In this case, the settings and setting templates currently saved on the server could be run off laptops and later updated to the servers.

Facilities

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Director – Facilities and Security will:

- Function as Facilities Damage Assessment Coordinator.
- Direct preparation of alternate work sites for use.
- Determine if additional, alternate space is needed for overflow due to company growth since the last plan update.
- Notify the night crew of the disaster and provide direction as to what the next steps are.

Following network & system restoration: Days 1+

The Director – Facilities and Security will:

- Facilitate planning discussions with the Facilities/Security group to determine the support needed at the alternate work sites.
- Communicate facility plans to other departments, particularly for groups that will have to continue working remotely until additional or permanent work sites are available.

Physical Security

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Security Manager will:

- Lead physical security disaster response and recovery efforts until physical security and monitoring systems are restored.
- Perform other activities governed by physical security policies, procedures and plans, such as:
  - Coordinating with emergency response and local authorities.
  - Arranging for additional physical security resources during response and recovery efforts.
  - Setting up access control systems and preparing alternate work sites for use, etc.

Following network & system restoration:

Day 1

The Security Manager will facilitate a planning session with the Security staff to:

- Set up access control for Belleville and revise access privileges for staff working at alternate sites.
- Deploy Security staff to various ITC locations to oversee security efforts on-site.

Days 2+

The Security Manager will:

- Provide direction to Security Coordinators and staff.
- Notify staff when other ITC personnel are set up to work in Belleville and other sites (as applicable) and provide new contact information.
- Assist with securing areas that require repair/reconstruction.

Information Technology: Information Security & IT Governance

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Information Security & IT Governance Lead will coordinate all actions required by Attachment 1, CIP-084 Critical Asset Recovery Plan.

If necessary, the Lead will direct backup tape data retrieval and restoration as described in the Tape Backup and Restoration Process.

Following network & system restoration:

Days 1+

The Lead will arrange and facilitate a meeting with key members of the group, including the IT Purchasing Lead, Telecommunications, and Applications Support personnel, to develop a plan for returning to normal operation. The meeting should include discussions on work necessary to change the focus from recovery to continuity efforts.

Information Technology: After the Fact Reporting

Following network & system restoration:

Days 1+

The group Lead will arrange and facilitate a planning discussion with key members of the After the Fact Reporting group, including the Production Lead and the Senior Systems Analyst to develop a plan for returning to normal operation. The meeting should include discussions on work necessary to change the focus from recovery to continuity efforts.

Information Technology: PeopleSoft

Following network & system restoration:

Day 1

The PeopleSoft Lead will arrange and facilitate a planning discussion with key members of the PeopleSoft team, including the System Analyst and Database Administrator, to develop a plan for returning to normal operation. The meeting should include discussions of work necessary to change the focus from recovery to continuity efforts.

Day 2+

The PeopleSoft Lead will notify additional PeopleSoft resources to resume work and will provide direction on the priorities and activities that need to be addressed.

Information Technology: TMS/SCADA

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Information Technology – TMS/SCADA Leads will coordinate TMS/SCADA actions required by Attachment 1, CIP-094 Critical Asset Recovery Plan.

Following network & system restoration:

Days 1+

The Leads for the TMS and SCADA groups will arrange and facilitate a planning discussion to develop a plan for returning to normal operation. The meeting should include identification of any tasks that can be performed remotely and assignment of required resources and identification of personnel who should plan to work from the Ann Arbor location.

Legal Department

Following network & system restoration:

Day 1

The General Counsel for Utility Operations will:

- Arrange and facilitate a planning session with the Legal Department attorneys to discuss the status and impact of recovery efforts.
- Identify appropriate points of contact/alternate points of contact to obtain the information the Legal Department needs to address the issues.
- Identify and prioritize legal issues related to recovery efforts, other work in progress, or outstanding issues prior to the disaster.
- Notify internal customers, legal service providers, and the EMT where the Legal Department will be operating and how to communicate with the group.

Days 2+

The General Counsel for Utility Operations will oversee Legal Department work, and:

- Provide direction to the support staff.
- Facilitate briefings and communications internally and externally, as appropriate.
- Notify Legal Department staff, internal customers, and outside counsel of new phone/fax numbers when relocating to Outside Counsel Offices like Dykema.

Real Time Operations (Does not include Shutdown Coordination) and Control Area Operations

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Real Time Operations and Control Area Operations Leads will coordinate Real Time Operations and Control Area Operations efforts to resolve any disruption to transmission system and Local Balancing Authority operations.

Following network & system restoration:

Days 2+

The Real Time Operations and Control Area Operations Leads will oversee and manage Operations work, such as:

- Providing direction to Transmission System Coordinators and System Reliability Controllers working in the Control Room.
- Providing direction to Operations Technicians working from home, including changes to substation one line diagrams that are maintained and accessed by field staff.

The following are general guidelines for Operations staff to return to work:

- Transmission System Coordinators and System Reliability Controllers will work out of Ann Arbor according to the schedules established for Operations.
- The Director - Real-Time Operations, Manager – Operations Control Room, Manager – Control Area Operations, and Supervisor – Control Area Operations will work out of Ann Arbor.

Shutdown Coordination and Operations Engineering

Following network & system restoration:

Days 2+

The Shutdown Coordination and Operations Engineering Leads will oversee and manage activities, such as:

- Providing direction to staff at each location if staff reports to multiple locations.
- Facilitating regular communications, since staff may be working at different locations, and arranging face-to-face meetings when appropriate.
- Notifying staff expected to work at the Ann Arbor location when the facility is ready for use.
- Notifying other work groups and partners of Ann Arbor phone/fax numbers.

The Operations Engineering Lead will also participate in the EMT as the Operations Lead and will act as the representative of the Real Time Operations, Control Area Operations, and Operations Engineering groups to provide recovery and restoration updates and coordinate OCR efforts with the EMT throughout the recovery efforts.

Safety

During recovery efforts:

In addition to the actions noted under "All Departments" above, the Safety Lead will:

- Perform other activities as governed by ITC safety policies, procedures and plans, such as:
  - Coordinating with emergency response and local authorities.
  - Facilitating emergency evacuations, assisting with and coordinating care for the injured, and working with Human Resources to notify families.
  - Coordinating additional safety resources for support response and recovery efforts.
  - Investigate any incidents involving Workers Compensation as soon as possible.

Following network & system restoration:

Day 1

The Safety Lead will arrange and facilitate a planning session with the Safety staff to deploy Safety staff to various ITC locations to oversee safety and security efforts at each site.

Days 2+

The Safety Lead will oversee and manage Safety efforts, such as:

- Providing direction to Safety Coordinators.
- Notifying staff when other personnel are set up to work in Belleville and other sites (as applicable) and providing new contact information.
- Ensuring work areas are safe, including those areas that require repair/reconstruction.

Other Department Work Groups

These groups include Compliance and Training, Long Term Planning, Supply Chain, Treasury & Investor Relations, Financial Planning & Analysis, Human Resources, Development, Federal Affairs, and any other groups not specifically identified.

Following network & system restoration:

Days 2+

The Lead for each group will:

- Notify other staff when they should start working out of the Alternate Work Site location and provide guidance on their priorities and activities.
- Facilitate briefings and communications, since all staff personnel will be working remotely.
- Determine whether a work-around process is required as the company resumes normal operation.