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## General Comment

ETE updates should be done every three to five years or at the request of the state or local authorities. The current guidance is too subjective and leaves the determination of when to up-date the ETE to the utility regardless of state requests. We have just completed an up-date to an ETE and seeing a 27% increase in population at this time. That is too big of an increase in population to be seen between ETE updates.

The guidance should require the utility to annually update the population in the EPZ and conduct a full update of the ETE whenever there is a 5% increase in population since the last ETE.

The FEMA REP manual is requiring pets to be included into the evacuation planning and if this ends up being required the ETE must be required to include pets in the assessment and evacuation time estimate models.

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