

**STATE OF CONNECTICUT  
HOUSE OF REPRESENTATIVES**



**HOUSE DEMOCRATS OFFICE  
LEGISLATIVE OFFICE BUILDING, ROOM 4100  
HARTFORD, CONNECTICUT 06106-1591**

Ms. Kimberly Santopietro  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

Dear Ms. Santopietro:

Reliable utility service is essential to Connecticut's economy and our everyday life. Despite our great reliance on electricity, pole-mounted cable, phone, and internet, outages are increasing in terms of duration and the number affected customers. Connecticut recently experienced storms resulting in extended outages, causing whole towns to be without power, which puts the public at risk, causing businesses to lose revenue and causing schools to close. Millions of residents' lives have been disrupted.

Connecticut lagged behind other states in restoring power after the October Nor'easter and Hurricane Irene. Our neighboring states have legislatively set reasonable standards with respect to outage recovery. These states have lower electricity rates than Connecticut.

It is time to reassess Connecticut's weather-related predictive capability, storm preparation, ability to expeditiously effect power restoration, and communication between the utilities, state and local officials, and individual customers.

We are requesting the Public Utilities Regulatory Authority (PURA) at the Department of Energy and Environmental Protection to take two actions. First, we are requesting PURA to expand Docket 11-09-09 to specifically address items identified below. Second, we are asking PURA to engage a consulting firm with extensive experience in electric utility company management to audit Connecticut's electric utility companies' response to both Irene and the October Nor'easter. We ask you to report back to the Energy and Technology Committee by February 1, 2012 regarding legislative changes that may be necessary and the status of the docket progress.

## **PURA DOCKET**

We recommend PURA open a docket to establish performance benchmarks relating to system reliability and capability to effectively minimize and address outages. Reviewing practices and protocols in other jurisdictions, particularly those with significant storm related outage experience, and ordering an independent audit by a firm with experience in auditing electric company management, PURA should assess the ability of Connecticut's electric utilities to meet benchmarked standards, order changes to ensure appropriate capabilities, and determine appropriate steps when standards are not met. The docket results should be reported to the General Assembly's Energy and Technology Committee, and should include recommendations regarding any needed changes in state statutes, including any additional authority PURA may need to take action upon a declaration of a state of emergency by the Governor.

Current outage restoration practices should be reviewed, including:

- Pre-storm damage predictive capabilities;
- Post storm damage assessments;
- Post storm restoration management, including timely access to alternate resources (*e.g.*, regional and reciprocal aid contracts);
- Planning for at risk and vulnerable customers; and
- State and local official and customer communication policies, including individual customer restoration estimates and the accuracy of such estimates.

The utilities' infrastructure should be assessed regarding its ability to withstand various storm categories and severity, including whether:

- Facilities and equipment are in good repair;
- Facilities and equipment are capable of meeting operational standards;
- The utility is following industry best practice regarding operation and maintenance;
- The age and condition of the poles and their attachments;
- Maintenance has been deferred;
- There is adequate access to replacement equipment (poles, transformers, wire and switchgear) for substation, poles and wire damage.

The coordination efforts between the utilities and the telecommunication and cable companies should be assessed with a focus to ensuring adequate pre-storm planning, post storm restoration and plans for emergency generators and back up battery power where needed to restore and maintain essential communication.

Once current practices and conditions are reviewed, PURA should establish minimum prospective standards and a timeline for their implementation. These standards should include, but are not limited, to the following:

### **1) STAFFING**

Establish minimum staffing levels relative to numbers of customers, of outage planning and restoration personnel (including linemen, technicians and system engineers), tree trimming crews, and staff with responsibility for directing operations including directing outside crews, communications with officials and regional operations planning.

Determine necessary staffing levels for each critical purpose including those needed to direct operations during different storm levels.

Develop standards for restoration and recovery time based on various storm classifications, including estimates of the staff needed to meet such time by skill set including in-house restoration technicians, personnel to direct the work of foreign crews, communications with local officials, regional operations planning.

Develop standards for prioritizing crew deployment and power reinstatement on a regional basis, ensuring safety and with consideration for at risk customers and vulnerable populations.

Review opportunities to expand storm response capabilities by:

- Development of standards for reciprocal aid contracts between Connecticut utilities and utilities outside of the state and region to accelerate timely deployment of needed staff;
- Development of emergency response contracts between Connecticut utilities and electrical contractors and tree trimming contractors within and outside the state and region to accelerate timely deployment of needed staff.
- Utilizing interested utility company contractors with the skills to address aspects of outages, such as HES vendors.

Determine standardized definitions of the crews used for various purposes related to addressing outages.

Require utility personnel to be independently certified and have appropriate training for their responsibilities during storm events.

Consider assignment of utility tree trimming crews to local EOC's and public works departments immediately after the storm for effective coordination of rapid road clearing and mitigation of safety issues.

## **2) COMMUNICATION**

Develop protocols for utility communications and coordination with state and local officials and EOC commanders, roads clearing, and establishment of restoration priorities. Protocols should be filed with PURA, reviewed by PURA staff, and either adopted as regulations or reflected in PURA orders to the utility, or both.

In addressing extended outages, require daily conference calls between utility officials and state and local officials and EOC commanders to provide updates and coordinate the outage response. Utility personnel on such conference calls must be required to have authority to adjust restoration priorities to facilitate needed action related to public health and safety.

Require utilities to submit proposals to PURA to expedite GIS overlaying of the utility distribution system (34KV or less), including with streets and roads.

Consider development and use of such mapping technology to provide updated detailed information to state and local officials and the public regarding restoration status and crew assignments to facilitate coordinated responses.

Require utilities to use NIMS FEMA incident command protocols during storm events.

### **3) PURA STAFFING, TRAINING AND REVIEWS**

During extended outages, establish procedures where PURA directly monitors the effectiveness of coordination and emergency related protocols.

Ensure PURA staff receives basic training in the National Incident Management System and act as observers in major utility EOC's to track progress and monitor effectiveness of the power restoration.

Establish procedures for PURA review of extended outages to make appropriate modifications to protocols to improve effectiveness.

### **4) TREE TRIMMING**

Connecticut's tree trimming policy should be assessed and appropriate standards developed. Tree trimming clearance standards must reduce future incidents of tree/wire conflict, including not permitting trees to overhang circuits.

In developing appropriate standards, PURA should:

- Determine the percentage of outages resulting from Hurricane Irene the October 2011 snow storm caused by trees outside the current trim area.
- Determine the amount each utility spent in the last five years for tree trimming, the amount the utility sought for this purpose, and the amount allowed by the DPUC/PURA.
- Determine the tree related SADI including major storms (number on minutes of outage per customer).
- Determine the impact of extending the area around power lines that require trimming, including the cost to utility ratepayers, and the extent to which this is likely to avoid damage to utility equipment and outages.

Require utilities to submit to towns a list of all trees impeding lines both on public and private property

### **5) UTILITY ACCOUNTABILITY**

Utility revenue adjustment mechanisms should be established for use when restoration standards are not met. These mechanisms may vary with the length of an outage, the percentage of customers affected, and safety factors.

Billing adjustments should be considered to mitigate costs incurred by customers as the result of an outage.

Reimbursement methods for compensating customers for food losses after extended outages should be developed.

Utility executive compensation that is borne by ratepayers should be tied to performance with appropriate metrics developed.

The assessment of monetary penalties for failure to meet designated benchmarks up to a percentage of transmission and distribution revenues should be enacted.



Christopher G. Donovan  
Speaker of the House



Vickie O. Nardello  
Energy and Technology, Chair

cc: Hon. Dannel P. Malloy, Governor

cc: Hon. Elin Swanson Katz, Consumer Counsel, Office of Consumer Counsel

cc: Hon. Daniel C. Esty, Commissioner, Department of Energy and Environmental Protection

cc: Hon. J. Brendan Sharkey, House Majority Leader, Connecticut General Assembly