



**Testimony
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President, COST
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Before the Energy & Technology Committee
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RE: TROPICAL STORM ISAIAS RESPONSE AND JULY 2020 ELECTRIC UTILITY RATE INCREASES

Thank you for the opportunity to comment on this important issue. The Connecticut Council of Small Towns (COST) appreciates the Energy & Technology Committee's initiative in addressing concerns regarding the electric utilities' storm preparation and response efforts.

Given projections that Connecticut may be faced with a significant number of storms this hurricane season, COST urges swift action to ensure that Eversource and United Illuminating immediately implement measures to improve storm response and preparation.

Make Safe Protocols

The biggest concern that our towns have raised is that their electric utility failed to adhere to well-established "Make Safe" protocols to address life safety issues. As part of the Make Safe protocols, electric utilities are required to work with municipal officials to: 1) mitigate electrical hazards caused by downed wires; 2) identify blocked roads that were impassible to vehicles; and 3) assign resources to clear blocked roads working from highest to lowest priorities until all blocked road locations were addressed. Clearing blocked roads in rural areas is particularly critical because there may not be detours available to residents and emergency vehicles, leaving them without any way of accessing food, water, or medical care.

Numerous towns have submitted comments and/or requested party status in PURA's docket 20-08-03 to highlight concerns that electric utilities abandoned make safe protocols, jeopardizing the health and safety of residents. The following are some of the responses that COST received in response to a recent survey:

1. Failure of Eversource to provide even the most rudimentary of Safe Road services-- certifying that lines are de-energized so that we could remove the trees that were trapping residents in their homes. Here is an example: a 75-year-old woman living alone, with cancer, husband in a nursing home, with a tree on wires blocking her (and only her) in at the end of a dead-end road. Two days of phone calls to my liaison, who was as powerless as she was sympathetic, and even more ignorant of just how an electric grid works.



2. Lines down causing brush fire reported on 8/4, not resolved until 8/5. With active fire burning next to a lumber yard and hay farm. Lines with branches smoking from the 4th until the 10th so the fire department was getting called there sometimes twice a day. Roads blocked enough that rescue vehicles could not get down until the 9th.
3. We had multiple locations with wires and/or trees in wires hanging across or in roads blocking access to residential areas not only for residents but for emergency vehicles that went unattended or unchecked for six days
4. We had difficulty getting make safe crews for several days so we could open blocked roads, some of which were dead ends.
5. At no time during the event did "Make Safe" crews enter our town, despite repeated requests for them, sometimes up to once every hour. The first request for a Make Safe crew was made when we opened our EOC at 0800 on Tuesday, prior to the beginning of the storm.
6. There were significant delays in response to Priority 1's and Make Safe operations. There were times that an Eversource representative advised that a line was safe despite having a tree against it, hours later the tree brought the line down causing an additional power outage and power surge and damage to a nearby business.
7. It took several days to clear a blocked road with the only access being an 8-mile loop around. There was delay in bringing a 16-unit apartment back on like even though they had no water.
8. Multiple roads with downed wires in trees. First "make safe" crew not assigned until Friday, Aug 7 and the first road cleared at 11:30pm. Last road reopened Monday, Aug. 10 at 4am.
9. Eversource did not make someone available to "make safe" until 24 hours AFTER the storm had ended. Additionally, after telling us someone would help us with "make ready" at 6:00 am the following morning, they failed to let us know that this would not occur and, further, did not inform us that one would be available until 2 hours before they showed up.

Failure to adhere to make safe protocols is inexcusable and put our residents, including individuals with medical conditions and the elderly, in grave danger for prolonged periods of time.



In addition to these issues, electric utility companies must address the following to adequately prepare for and respond to storm events:

Communication

- Develop a comprehensive communications outreach plan to improve coordination of restoration efforts with town officials, including the dispatching of crews to ground downed wires;
- Provide towns with emergency contact information to ensure that town officials can get in contact with utilities to ensure that crews are dispatched immediately to respond to dangerous or life-threatening situations;
- Establish a centralized contact point for town officials to communicate with utility officials to better coordinate efforts between utility work crews and public works departments;
- Utilize a portal system, such as WebEOC, to enable municipal officials to input data on blocked roads and other life safety issues;
- Continue to utilize municipal liaisons to improve communication between town officials and electric utilities but ensure that liaisons are empowered to work with higher ups;
- Ensure that municipal liaisons have accurate and timely information on power restoration efforts to relay to towns; and
- Provide accurate timeline for restoration efforts.

Utility Preparation and Response Efforts

- Ensure that Eversource and United Illuminating identify critical facilities, including hospitals, nursing homes, police and fire stations, and water and wastewater treatment facilities and prioritize restoration to those facilities;
- Require Eversource and United Illuminating to work with town officials to identify areas that serve vulnerable populations, such as elderly housing, as priority areas in restoration efforts, even if they are not in densely populated areas;
- Require Eversource and United Illuminating to work with town officials to identify key access roads in small towns that are vital to obtain food, water, and health care services or to evacuate residents;
- Improve coordination between assessing storm damage and beginning restoration efforts so that restoration efforts are not delayed;
- Review Eversource's efforts to project storm events and potential impacts and recommend the use of modeling to improve projections;
- Require electric utilities to compensate residents for food spoilage if outages last beyond a certain period of time; and
- Maintain a database of municipal priorities for power restoration rather than compile such data during each power outage.



Utilization and Management of Crews

- Determine whether the current management and compensation structure of Eversource and United Illuminating is adequate to maintain a sufficient number of line crews and tree crews necessary to respond to extensive power outages;
- Incorporate into any response plan procedures for employing sufficient staffing levels in the event of widespread outages, including customer service representatives and work crews;
- Following a storm event with significant power outages, immediately assign one line crew to each town to work with town officials to identify what needs to be done to render areas safe and to restore or repair power;
- Communicate directly with town officials regarding the number and location of crews assigned to a town;
- Better manage crews once they arrive on site, particularly out of state crews that must wait for direction; and
- Enable liaisons to keep track of field crews directly through the use of GPS.

What is particularly troubling, however, is that these are the very same issues that plagued power restoration efforts following Storms Sandy and Alfred in 2011. In response to concerns raised following these storm events, PURA ordered electric utilities to implement measures to ensure adequate storm preparation and response. In addition, lawmakers adopted measures to address electric utility emergency restoration efforts.

We urge lawmakers to ensure that these issues are addressed.

Thank you for the opportunity to comment.