



September 7, 2020

**Re: Testimony to CGA Energy and Technology Committee in support of LCO No. 3920:
An Act Concerning Emergency Response by Electric Distribution Companies and Revising
the Regulation of Other Public Utilities**

The Greenwich Tree Conservancy, an 800 strong non-profit organization, whose mission is to preserve and enhance the tree and forest resources to benefit the community its health and its quality of life. We have worked with and watched Eversource for over a decade. In August, we submitted testimony to this Committee and to PURA to look beyond Eversource's "act of nature" response, to the broader elements of the quality of their systems and response, the recognition of new weather patterns, and the current financial structure under which Eversource operates.

Eversource is a critical infrastructure supplier that must manage, and be managed, more effectively. This comprehensive legislation addresses many of the questions that we raised as well as goes beyond to address other constituents' concerns. We would like to express support for those elements that relate to the "blame the trees" concerns and suggest a few modifications.

- We wholeheartedly support (Bill sections 1&2) requiring PURA to develop performance-based metrics of regulatory oversight, that the development of those metrics be tied to and consistent with the State's Integrated Resources and Energy Plans. We also support giving PURA the ability to "demystify" and scrutinize the components of proposed rate increases in light of a broad-based performance evaluation.
- We wholeheartedly conceptually support (Bill sections 3,9-12) incentives for improved performance and penalties for continued inadequate performance, particularly those penalties for inadequate performance during and after emergencies, having those funds collected as penalties allocated to ratepayers and not using those penalties as operating expense for future rate increases. We will defer to others with more expertise on the form of those incentives and penalties.
- We fully endorse requiring data gathering regarding past storm events, e.g, resources expended, damage and service outages, restoration management, etc. (Sec 13). However, in our view limiting the data gathering of the last 5 storm events categorized as level 3, 4 or 5 is insufficient. Isaias was a category 1 storm which would be missed by this measure. The severe storms that created the 5 CT tornados in August did not reach the threshold of categorization but resulted in significant impacts. Widespread damage occurs in events that are not hurricanes of 3, 4, or 5 and that data should be captured. We urge the legislature to consider other metrics such as time, e.g., storms since 2010 that have created widespread outages in a particular community or across the state.
- We support requiring regional service centers for increased responsiveness (Sec 14) as was practice in the past.

- We applaud the E&T Committee for recognizing the need for implementing resilience projects and proposing a grant and loan program to accelerate implementation of such projects (Section 19). Five tornados in one month is a sign of Connecticut's severe weather to come in our future. Damage to our antiquated distribution system is inevitable in 80+ mile hour winds. One need only look at images of Louisiana, with relatively few trees compared to Connecticut, and see the damage to the distribution system in the recent hurricane. We also recognize the need to start with critical facilities such as municipal centers, police and fire stations and hospitals.
- While we support requiring DEEP to work with the CT Academy of Science and Engineering regarding the study of options for the provision of reliable electric service, including undergrounding, we ask that it be made clear that projects applying for grants for undergrounding prior to the study's completion will not be downgraded or denied. Years ago, Greenwich asked Eversource for a pilot undergrounding project which would extend from Railroad Avenue to Town Hall to Greenwich Hospital (approximately 2 miles) and nothing happened. With new incentives and a grant and loan program this could provide the impetus for this pilot project.
- We also support water utilities filing plans for promoting water conservation (Section 2)

Additions and Changes to Bill:

- In relation to the above comment, the GTC further urges a more explicit statement of support for undergrounding of wires in critical areas now, not after the completion of the assessment report. Connecticut must not only modernize how we generate and use energy; we must modernize how we deliver it too. We should not be relying on century-old pole distribution technology to withstand storms while accommodating the 21st Century weight of cable, transformers, coils of wire, internet, and phone.
- GTC urges incorporation of recommendations from the 2012 State Vegetation Management Task Force report in particular providing funds to municipalities for their use in hazardous tree assessments and removals.
- Telephone company references need to more inclusive "communications technology company"
- Several cases where the years in the proposal seem like typos: lines 925 and 940 appears to be a typo in stating deadline of 2013 and assume the intent was 2023; Line 1004 reads 2012 assume should be 2022

We watched and listened to the PURA hearing and the first E&T Committee hearing and noted that Eversource said their reliability has improved dramatically in non-storm events. Reliability should be the rule in non-storm events – in a 21st century system we should not be experiencing outages due to squirrels being electrocuted on the lines, for example. It is storm response and recovery that must improve as Connecticut prepares for more frequent and severe storms in our future.

Respectfully Submitted,

Cheryl Dunson, GTC President

355 Taconic Road
Greenwich, CT 06831
treeconserv@optonline.net