

ENERGY AND TECHNOLOGY

CCM Testimony Storm Response Informational Hearing

September 8, 2020

Municipal officials were given a challenging test by Mother Nature – once again – a test they have been preparing for and one they thought the public utilities had been preparing for as well or at least so they had thought. CCM and its membership would like to first acknowledge the tremendous efforts undertaken by our local public works departments and first responders in the days, weeks, and months prior to this storm, the efforts during the storm and the tedious cleanup work that followed. We are grateful to all of our dedicated staff who protected our residents during this storm.

CCM thanks the Co-Chairs and Ranking Members of the General Assembly’s Energy and Technology Committee for putting together this draft legislation and for hosting this listening session today.

On behalf of our entire membership, we appreciate the opportunity to submit this testimony in the spirit of working together as local and state partners to ensure that Connecticut’s public utilities are better prepared when future natural disasters come our way again.

Comments on the working draft, “An Act Concerning Emergency Response by Electric Distribution Companies and Revising the Regulation of Other Public Utilities” (LCO 3916).

CCM supports LCO 3920 as currently drafted. This working draft provides the transparency and recourse necessary to improve our storm response and recovery in the State.

While we support the bill overall, we wanted to highlight specific points that we believe are critical to fixing our broken system and enforcing public utility compliance.

- The requirement that the Public Utilities Regulatory Authority (PURA) evaluate the performance and service of the utility companies and establish performance metrics and standards, which also includes consideration for municipal engagement.
- The requirement in that the utility companies submit a baseline report that recaps, based on specific analyses outlined in the section, the past five level 3,4, or 5 storms.
- The requirement that the utility companies establish regional service centers run by Connecticut-based grid and powerline staff and managed by a permanent Connecticut incident command management team. **Language should be added in this section to require some level of municipal and/or Council of Government coordination to ensure that these regional service centers and the communities they represent are in continual communication and coordination.**
- The requirement that the Department of Energy and Environmental Protection (DEEP), without consultation by the utility companies, perform an assessment of the State’s energy and capacity to determine whether the current wholesale market structure is supporting the Department’s policy objectives.
- Expansion of the current microgrid grant program, through DEEP, to include funding and technical assistance to municipalities for resilience projects. Providing priority to those communities with the most vulnerable populations.

- The requirement that the DEEP in collaboration with PURA, the Office of Consumer Counsel (OCC) and the Energy and Technology Committee, review the Northeast Utilities and N-Star merger settlement agreement to ensure that any commitments to the state were kept. There has been much discussion since this most recent storm related to the stark difference in customer service and municipal engagement since the merger.
- The establishment of an Independent Consumer Advocate within the OCC. Such Advocate is automatically made a permanent member of the utility companies Board of Directors.
- Section 22 re-establishes the Energy Conservation Management Board.

CCM would request that the draft be amended to provide for municipal representation on such Energy Conservation Management Board.

In addition to the changes proposed in the working draft, CCM offers the following suggestions for process improvements by the utility companies. Most of you will remember that CCM offered these suggestions in 2011 and 2012 and then again in 2017. We are encouraged by this hearing, the working draft and the Committee's commitment to improving the system, however, we lack confidence in the public utilities to act in good faith with regard to resilience planning, and storm response and recovery. As such, CCM would ask that these suggestions be mandated in the proposed draft.

Improvements of the Current Process for Consideration:

Overall coordination/communication between municipality and utility needs improvement:

- Utility liaison program failed during this most recent storm. In particular:
 - Liaisons lacked autonomous decision-making and command authority over line crews;
 - Municipal and utility coordination in regards to "vital areas for restoration" are agreed to, however, they are not acted upon during an event;
 - Providing a process for the submission of reports (utility liaison to utility EOC) when emails and phones are not working; and
 - In many instances, responsiveness in sharing restoration, priority, and GIS data with local officials was not timely and inaccurate.
- **Prioritizing "make safe" operations**, to clear the roadways of downed wires and downed trees with wires in them, should be at the top of the utility companies list when a storm of this magnitude hits. This is work that local municipal road construction crews are not permitted to do unless accompanied by a qualified utility line crew. The utility companies failed to support "make safe" operations in favor of restoring power where easily accomplished.
- There is a growing concern amongst municipal officials that utility crews are not prepared to complete work once they are in the town or city. Crews should be in place to be prepared to perform service immediately when they are in town and the weather event has diminished.

- Better coordination between utilities/municipalities/State DOT on road clearing. Many towns found that local integration of utility crews with local public works crews were effective, but were unsure how successful integration was between utility crews and State DOT crews.

Additional suggestions for improvement:

- **Strengthen real-time communication, between individual municipal CEOs and their corresponding recovery crews (utility crew supervisors, tree removal crews, local Public Works and utility line crews). Additionally, improving the information that Municipal Liaisons have to share with their municipalities while also giving them more authority on the ground.** A common concern was the inability for these different disciplines of restoration to communicate among each other. This inability was cited as one of the main causes for delays in the restoration of local services. Particularly the lack of authority given to the Municipal Liaisons.
- **Establish a “strike team” model of communication that (1) deploys restoration assets (the various field crews) and outlines a definitive chain-of-command within in the field, (2) equips designated leaders in the field with adequate communication capabilities (interoperable radios), and (3) conducts regularly scheduled reports directly to local EOCs.** Such a recommendation could build off the “utility liaisons.” In addition, utility liaisons’ authorities and responsibilities should be more clearly defined in order to be more effective. Utility liaisons should also be included earlier in the local emergency management planning process – from preparation to response to recovery.
- Provide more effective communication that is specific, timely and accurate. Officials see the need to **improve the collection and dissemination of local utility data, possibly via GIS mapping capabilities** (i.e., the location of major circuits/substations in relation to local priority restoration points – correlated with the specific causes and locations of power outages). Local officials’ real-time access to such information could provide their field crews with a concrete game plan for restoration. If such a blueprint were in place – combined with the ability to communicate among all field disciplines – then local recovery efforts could be more efficient, and information to residents on the progress (or lack thereof) could be more effective.

Overall, true partnerships need to be strengthened between the state, local officials and their private utility counterparts so together, as a team, we are better prepared to protect the residents of Connecticut. The old adage rings true today more than ever before that the time to exchange business cards is not at the scene of an emergency.

As Connecticut’s statewide association of towns and cities, CCM is willing and ready to help facilitate a strengthening of these partnerships among all local, regional, state and private sector officials.

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