

**STATE OF CONNECTICUT  
PUBLIC UTILITIES REGULATORY AUTHORITY**

**PURA PROCEEDING ON LCO No.  
3920. AAC EMERGENCY RESPONSE  
BY ELECTRIC DISTRIBUTION  
COMPANIES AND REVISING THE  
REGULATION OF OTHER PUBLIC  
UTILITIES**

:  
**: September 8, 2020**  
**: LCO No. 3920**  
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**Comments on the EMERGENCY RESPONSE BY ELECTRIC  
DISTRIBUTION COMPANIES LCO 3920**

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Chairperson Gillett, Commissioners Betkoski and Caron, Executive Secretary Gaudiosi, and PURA Staff, I appreciate the opportunity to comment on LCO 3920 AN ACT CONCERNING EMERGENCY RESPONSE BY ELECTRIC DISTRIBUTION COMPANIES AND REVISING THE REGULATION OF OTHER PUBLIC UTILITIES.

These comments are solely my own and are partially redundant of some previous comments/testimony on other related issues.

### **Forward**

It is my opinion that the most important function of government is to ensure the health, safety and security of its citizens. In justifying that these comments are relevant to this study, PURA has made it clear in other documents that health is considered to be a “Societal” value.. One [definition for security](#) reads, “...the state of being free from danger or threat.” This is with the understanding that security may contain not only elements of health but also resilience, reliability, safety, harm avoidance and, in one specific case, for meeting climate change adaptation goals.

That being said, in the latest (as well as past) iterations of LCO No, 3916/3920, I have failed to find any reference to cyberattacks as part of any disaster scenario in part or in whole. Whether alone or in combination with a storm or other natural events (what is termed a blended attack), this has the potential to greatly worsen conditions both during and after the event(s) and could lead to significantly more loss of life.

I would like to know if this was by purpose, design and, if the latter, what thought went into this decision if any. If this was just not even an afterthought, I would also be interested in the reasoning behind that as well.