



Marissa Paslick Gillett, Chairman
John W. Betkoski III, Vice-Chairman
Michael Caron, Commissioner
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

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Filed electronically PURA.information@ct.gov

Re: TESTIMONY for Docket Numbers 20-01-01 and 20-08-03 on Eversource Rate increases and preparation for and response to Tropical Storm Isaias

Dear Chairman Gillett, Vice-Chairman Betkoski and Commissioner Caron:

The Greenwich Tree Conservancy has worked with and watched Eversource for over a decade. Many conversations, workshops, testimony and attempts at partnering have transpired. Yet, we continue to be alarmed at their lackluster performance. If the past serves as a predictor of the future, then the State of Connecticut, a coastal state already impacted by climate change, needs to implement immediate changes to our energy sourcing and management. There is no reason why trees and infrastructure cannot coexist. Mature, healthy trees are the backbone of our ecosystem and are essential to mitigate the severe weather which will recur due to climate change. We must balance the needs of the utilities with the measurable benefits provided by trees to our communities.

Eversource is quoted as saying that the impacts brought on by Tropical Storm Isaias were an "act of nature." (<https://www.nbcconnecticut.com/news/local/power-out-for-400-eversource-customers-nine-days-after-tropical-storm-isaias/2318296/>) It strikes us that prolonged outages and the related devastating impacts to our municipalities, economy and residents were not solely an act of mother nature, but also of human nature. In 2012, PURA slammed Connecticut Light & Power in a decision analyzing the utility company's response to two storms, calling it "deficient and inadequate." (<https://patch.com/connecticut/wilton/pura-wants-to-penalize-clp-for-deficient-response-to-a0b81b9fa4>) Despite the passage of 8 years and reported efforts to strengthen the grid and its storm responses, the successor's response remains inadequate and deficient. They did not have a well-crafted restoration plan and the crews they did have were not allocated in an efficient manner. Many towns did not see crews for many days.

FERC Ruled on December 28, 2015:

"...that ISO-New England's Transmission, Markets, and Services Tariff is unjust, unreasonable, and unduly discriminatory or preferential. Tariff lacks adequate transparency and challenges procedures with regard to the formula rates for ISO-NE Participating Transmission Owners. In addition... we find that the ISO-NE PTOs' current Regional Network Service and Local Network Service formula rates appear to be unjust, unreasonable, unduly discriminatory or preferential, or otherwise unlawful. The formula rates appear to lack sufficient detail in order to determine how certain costs are derived and recovered in the formula rates."

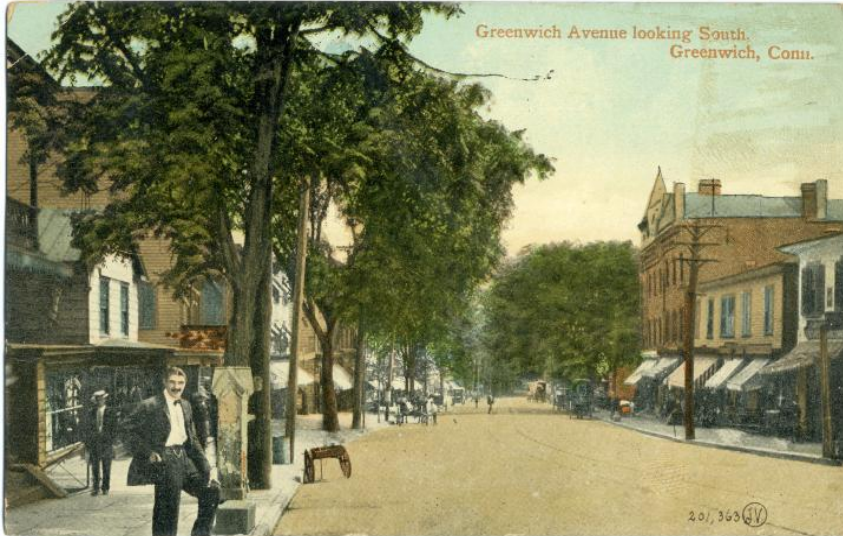
PURA must demand accountability. Eversource has spent increasing amounts of money on replacing poles and cutting down trees and passing the cost on to the ratepayer. Did this approach improve reliability? We urge our State officials and PURA as the regulating authority to look beyond Eversource's "act of nature" response, to the broader elements of the quality of

their response, the recognition of new weather patterns, and the current financial structure under which Eversource operates.

Transmission and Distribution Systems

The questions that come to mind:

- How does the current above ground pole distribution system in Greenwich compare to that designed a century ago? One need only look at images of Greenwich from the early 1900s to see the lack of progress.



system to withstand storms while accommodating the weight of cable, transformers, coils of wire, internet and phone?

- How has Eversource strengthened the pole distribution system to withstand storms while accommodating the weight of cable, transformers, coils of wire, internet and phone?
- How many more storms, money spent in storm impacts, and post storm assessment reports are required before we provide for the gradual conversion of overhead wires to underground wires where geographically feasible? Years ago, our Town requested an undergrounding trial for Field Point Road from Railroad Avenue (the site of the new power substation) to Greenwich Library and Hospital. There were discussions with Eversource but Eversource never followed through.

We also need to explore microgrids, energy storage and decentralized generation in anticipation of continued and increasing severe weather. We urge PURA to join with municipalities in seeking alternatives to antiquated pole distribution systems.

Severe Weather

There is a broad consensus that storms will be increasing in intensity and frequency. Isaias was not a hurricane. We had two documented tornados touch down in Litchfield County the weekend *before* this storm hit, and two tornados that occurred in Fairfield County during the storm. In this most recent storm, the majority of trees that came down in the Town of Greenwich were healthy, so it is not a question of managing our trees, it is a question of managing our utility company.

Superstorm Sandy and Storm Irene were reportedly “lessons learned.” Yet, if lessons were learned and meaningful changes made, why did it take 8 days for Greenwich’s power to be fully restored? How would Greenwich have fared if the \$100 million on the new substation had been allocated instead to a \$50 million upgrade of the existing substation and \$50 million spent on meaningful upgrades to the distribution system?

Also, after Sandy, a need was determined to employ smart technologies; the National Association of Electrical Manufacturers published in 2013:

“Rebuilding after any major storm is a formidable challenge. The core principal of any major reconstruction effort should be to “rebuild smart,” ensuring that reconstruction funds maximize the deployment of technologies to mitigate future power outages, save

lives, and protect property. Rather than spending money on antiquated infrastructure that can come down with the next storm, why not consider other alternatives like Microgrids, Energy Storage, and Decentralized Generation that can make power systems safer, reliable, resilient, and more readily restored following a disaster.” (NEMA The National Electrical Manufacturers Association • www.NEMA.org/Storm-Reconstruction)

- How much has it cost the state, municipalities, and the utility to deal with the impacts of this storm? In looking back 20 years, how much has been paid both directly (tree trimming, storm clean-up) and indirectly (business loss) by the utilities, municipalities, State and businesses? How does that compare to the cost of undergrounding densely populated areas? It is time for utilities to make grid resiliency a priority, including undergrounding wires in densely populated areas.
- Has PURA looked at Eversource’s Budget, P&L or Balance sheets to determine their expenditures for tree trimming/removal plus how much they spend on cleanup, replacing damaged poles/ lines and power restoration, then compare those combined costs to what it would be to put powerlines underground?

Financial Structure

Reportedly, Eversource’s second-quarter profits totaled \$252 million, up significantly from the same quarter a year ago. Eversource has raised rates yet has had the worst response to a storm in years. In addition to looking at the antiquated electric power distribution, and the need to significantly upgrade the system to withstand more severe and frequent storms, officials should closely assess how the financial structure promotes lack of accountability and reliability during times of crisis.

- Why is Eversource granted a guaranteed rate of return rather than a return contingent upon performance?
- Why aren't incentives placed by PURA that will promote undergrounding of wires where appropriate? If poles are truly the only option, then how can they be replaced based upon 21st century demands of a system to ensure electricity and communications systems?
- Is the regulatory financial structure providing incentive to "trim" trees and pay for storm damage rather than burying the lines? Does the higher rate of return for transmission projects discourage investments in distribution projects? Does their financial structure need to be thoroughly evaluated to determine whether it promotes tree trimming and repeated storm recovery costs shouldered by ratepayers rather than resiliency investments which would perform better under severe weather conditions?

The Greenwich Tree Conservancy asks PURA to demand answers from Eversource to these questions. Tropical Storm Isaias caused significant damage to the power grid and downed trees were blamed. Eversource needs to stop blaming nature and put a plan in place for CT, using 21st Century solutions.

The Greenwich Tree Conservancy also believes a different incentive program is necessary that rewards innovative technological solutions. Eversource has shown that they will not do what is cost effective and innovative unless it is mandated by PURA.

Respectfully submitted,

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