



OCC's Recommendations in Storm Docket

In June, the Office of Consumer Counsel (OCC) filed a comprehensive brief and reply brief in Docket No. 11-09-09, *PURA Investigation of Public Service Companies' Response to 2011 Storms*. OCC has made many recommendations, including:

- (i) the need for better communication and coordination between utilities and municipalities to establish town priorities, including public safety, road clearance and restoration of power at key facilities;
- (ii) the need for better utility pre-storm planning, training, and drills;
- (iii) the need to monitor and review electric line worker staffing; and
- (iv) the need for coordinated utility pole administration, including more clarity as to which utility will be responsible for pole repair and replacement obligations. The absence of such coordination created confusion between towns and utilities, as well as some needless delays.

Specifically as to CL&P, OCC asked PURA to make some findings of imprudence. First, OCC asked that CL&P be found imprudent for repeatedly claiming that power would be restored after the October snowstorm to 99% of customers by midnight on Sunday, November 6. CL&P continued to indicate to the public that this goal was reasonably achievable long after CL&P knew or should have known that it was highly unlikely. Testimony in the record indicated that many relied on the 99% restoration claim in making key decisions, including about the sufficiency of their home resources (food, ice, fuel for generators, etc.), whether to book hotels or relocate to stay with relatives, planning for the needs of those at emergency shelters, school closures, and Election Day planning. When CL&P fell tens of thousands of customers short of meeting the 99% restoration standard by Sunday at midnight, it created an additional and unwelcome surprise and further burdens for distressed customers.

Second, OCC asked PURA to find that CL&P's Town Liaison program was imprudently designed, implemented, and managed, as it did not facilitate effective communication and coordination between CL&P and the towns it served.

Third, OCC asked that PURA find CL&P to have been imprudent for not accelerating the implementation of mobile data terminals in its line trucks, so that accurate information about damage and restoration can be conveyed immediately. Instead of having mobile data terminals, CL&P continued to rely in part on paper updates filed at the end of shifts.



As to telephone and telecommunications issues, OCC is seeking that AT&T develop a more accurate system for estimating outages, and is seeking that AT&T and Verizon update their emergency plans so that they contain Connecticut-specific provisions and annual live drills. OCC also asked PURA to continue to consider the need for back-up power generation at cellular telecommunications towers. Because many customers have become so dependent (or even completely reliant) on cell phones, it has become increasingly important to ensure reliability of cell towers so that customers can convey outage or safety messages to utilities. The request described above for coordinated pole administration also impacts the telecommunications companies, who share pole ownership with the electric utilities.

PURA is scheduled to issue a draft decision on July 17 and, after hearing oral argument, will issue a final decision on or around August 1.