

**STATE OF CONNECTICUT  
PUBLIC UTILITIES REGULATORY AUTHORITY**

INVESTIGATION INTO ELECTRIC : DOCKET NO. 20-08-03  
DISTRIBUTION COMPANIES' :  
PREPARATION FOR AND RESPONSE TO :  
TROPICAL STORM ISAIAS : AUGUST 11, 2020

**FIRST SET OF INTERROGATORIES SUBMITTED BY  
WILLIAM TONG, ATTORNEY GENERAL FOR  
THE STATE OF CONNECTICUT, TO  
THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A  
EVERSOURCE ENERGY AND THE UNITED ILLUMINATING  
COMPANY**

William Tong, Attorney General for the State of Connecticut, hereby requests that The Connecticut Light & Power Company d/b/a Eversource Energy (“Eversource”) and the United Illuminating Company (“UI”) answer all of the following interrogatories no later and the United Illuminating Company than **August 31, 2020**. In the event that the information requested herein has been provided in this proceeding, the response need only specifically identify where the responsive data or information is located in the record.

**I. DEFINITIONS**

**A.** As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

**B.** As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

**C.** As used in these interrogatories, "include" and "including" mean "including but not limited to."

**D.** As used in these interrogatories, "concern" and "concerning" mean "relate," "relating," "refer," referring," "reflect," "reflecting," "about," "constitute" or "constituting."

**E.** As used in these interrogatories, "document" means all materials and tangible forms of expression in each company's possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, e-mails, messages, bulletins, personal digital assistants (PDA's), smartphones (e.g., "Blackberry's," "iPhone," "Droid") and other mobile electronic devices, or other electronic, social or industrial web-based media (e.g., Facebook®, Twitter®, LinkedIn®) within your control, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices, advertisements and including all metadata in all electronic documents.

**F.** "You," "your," or "your company" shall mean Eversource or UI as appropriate.

**G.** "Communicate" or "communication" means every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of ideas or information, whether orally, by document, or electronically, or whether face-to-face, by telephone, mail, personal delivery, electronic transmission, or otherwise.

**H.** "Identify," "identity," or "identification," (1) when used in reference to a natural person, means to state his or her full name and present or last-known address, present or last-known position and business affiliation and each position with you, social security numbers, and telephone numbers for residence and business; (2) when used in reference to any other person means to state its full name, present or last-known address, and telephone number; (3) when used in reference to a document means to state the type of document (i.e., letter, memoranda, chart, handwritten notes, calendar (electronic or paper), spreadsheet, sound reproduction, report, computer inputs or outputs, etc.) , the location where maintained, your identifying marks and code, the subsidiary, division, or department where prepared and sent, the document date, the author and persons to whom copies were sent or persons initialing or reading or approving the document, and the name and address of each of the present custodians of the document; (4) when used in reference to an event or instance means to identify each natural person involved in the event, to state when and where the event occurred, to state a description of the nature and substance of the event, and to identify any document related to the event; (5) when used in reference to a communication means to state each communication, the persons involved in the communication, where the communication took place, and a brief description of the substance of the communication, and to identify any document related to the communication.

## **II. INSTRUCTIONS**

The response to these interrogatories shall be submitted in the following manner:

**A.** Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the company's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct, and complete copies of the original documents.

**B.** Number each box and mark each box with corporate identification and the name(s) of the person(s) whose files are contained in that box. Documents shall be submitted in sturdy cartons not larger than 1.5 cubic feet. Cartons shall be filled completely.

**C.** Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

**D.** Documents should be produced as they are maintained in the normal course of business, and thus if documents are maintained in electronic form, they should be produced in electronic form. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document. Documents that have been electronically scanned should be produced in a .tif (TIFF image format) files, with an Opticon load file and a Concordance database with beginning and ending page, and numbers of pages noted. If a Concordance database is not attainable, a .csv (Comma Delimited Text) file with the same information is acceptable, with a caret (^) used to separate multi-value fields. If the OCR data is provided in individual text (.txt) files and there is no text for a text file, the following should be inserted in that text file; "Page intentionally left blank." If your documents are maintained electronically in an OCR (Optical Character Recognition) format, produce OCR text as well. Moreover, this production must include all objective coding for the production, to the extent it exists.

**E.** For electronic mail, please provide all responsive emails and if applicable, email attachments and any related documents, in a Concordance database format with .tif images, an Opticon load file, and an OCR (Optical Character Recognition) file. If a Concordance database is unattainable, please provide the data in a .pst (Outlook personal folder) file.

**F.** Produce deposition, proceeding, and trial transcripts in manuscript form, with a word index, and electronically on CD or DVD. The electronic version of the transcripts should be in Live notes PTF (Portable Transcript Format), PCF (Portable Case Format), or Plain Text format.

**G.** Documents to be produced include all documents in the possession, custody or control of Public Power, wherever located, including documents in the possession, custody or control of Public Power’s directors, officers, employees, representatives, or agents. Without limitation on the term “control,” a document is deemed to be in your control if you have the right to secure that document or a copy thereof from another person.

No agreement by the Attorney General of the State of Connecticut purporting to modify, limit, or otherwise vary these interrogatories shall be valid or binding on the Attorney General of the State of Connecticut unless confirmed or acknowledged in writing by a duly authorized representative thereof.

### **CLAIMS OF PRIVILEGE**

If you contend that any answer to any Interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

### **SCOPE**

Except where otherwise indicated, this set of Interrogatories covers the period from August 1, 2020 through the completion of each utility’s complete system restoration.

If subsequent to your initial compliance with these interrogatories you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) produce any additional responsive documents that come into your possession, custody or control or (b) notify the Attorney General of the State of Connecticut, or his designee, and serve supplemented, corrected, and sworn responses upon the Attorney General of the State of Connecticut, or his designee.

### **III. INTERROGATORIES**

AG-1) Please provide a copy of your current Emergency Response Plan (“ERP”) together with all supporting documents.

AG-2) Please provide a high-level summary of the Company’s management of Tropical Storm Isaias (the “Storm”) that occurred during the period August 2, 2020 up to and through complete system restoration and repair. Include the following:

- a. A detailed timeline and description of the steps the Company took to prepare for the Storm, including what efforts were made when to solicit assistance from contractors and mutual assistance from other utilities;
- b. Identify any factors unique to the Storm that hindered service restoration efforts;
- c. Any factors that constrained resource deployment during restoration efforts; and
- d. Descriptions of the methods the Company used to track, prioritize and repair outages during and after the Storm period. Include a detailed description of the methods the Company employed to efficiently coordinate its own crews, crews acquired by mutual assistance, contractors and town emergency response resources such as tree removal crews working for municipalities.

AG-3) Please provide an accounting of the number of line crews and other personnel assigned to storm restoration duties (referred to herein as “work crews”) from August 3, 2020 through the completion of the restoration effort. Include at least one data point every eight hours throughout the Storm and restoration period. Provide this data differentiated by the smallest possible geographical level of detail. Include the Company’s own personnel, contractors, and line crews obtained through mutual assistance from other utilities. Additionally, state the maximum current number of Company field staff available for service restoration in Connecticut,, differentiated by job function.

AG-4) Please describe all advance preparations for the management, supervision and oversight of the work crews identified in response to AG-3.

AG-5) Describe the management, supervision and oversight of the work crews identified in response to AG-3. Please include in this response:

- a. any organizational charts reflecting the management structure responsible for the supervision of the work crews and other personnel assigned to storm duties;
- b. the ratio of managers to work crews;
- c. the criteria used to assign and re-assign work crews throughout the state;

- d. a description of any systems in place to coordinate the management and assignment of work crews throughout the Company's service territory; and
- e. a description of any systems in place to facilitate communications between management and the work crews.

AG-6) Describe the number of work crews assigned to storm duties in each work center, municipality, or other geographical designation applied by the Company during the storm response and restoration. Include at least one data point for every eight hours throughout the storm and restoration period.

AG-7) Identify the managers and/or management groups that were responsible for the management, supervision and oversight of work crews in each work center, town, or other geographical designation applied by the Company during the storm response and restoration.

AG-8) Provide a copy of the weather forecast(s) that was/were relied on by the Company for forecasting its lineworker staffing needs, for each day from August 1, 2020 through the end of the restoration effort.

AG-9) For the period August 4, 2020 through the end of the restoration effort, separately identify the number of customers believed to have been without service, total and by town. Provide at least one data point every eight hours throughout this period.

AG-10) Provide copies (in color) of the Outage Map (as presented on the Company's website) as it existed during each day of the Storm period, from August 4, 2020 up to and through complete system restoration and repair.

AG-11) Provide copies of all system status reports issued during the period from August 4 through the end of the restoration effort, including damage assessments.

AG-12) Did the Company limit overtime or other compensation to its field staff during or after Storm? How? If so, explain the factors that led to that decision, and when that decision was made.

AG-13) Please describe all Company policies concerning restrictions on line and tree crew shift lengths during the period August 4, 2020 up to and through complete system restoration and repair.

AG-14) Please describe all Company policies concerning crew changes or crew relief at work sites.

- AG-15) Please provide a high-level summary of the performance of all third-party vendors or contractors the Company engaged to assist with all aspects of the Company's Storm management during the period August 2, 2020 up to and through complete system restoration and repair. Describe in detail any vendor or third party's performance that hindered or impeded the Company's restoration efforts, communications or any other aspect of Storm management.
- AG-16) Provide the communications plan concerning interaction with public officials and emergency response agencies during a major storm service outage.
- AG-17) Provide all documents concerning the distribution and application of this communications plan from August 2, 2020 up to and through complete system restoration and repair.
- AG-18) Describe whether and how the communications plan was implemented and applied from August 2, 2020 up to and through complete system restoration and repair.
- AG-19) Identify all dedicated utility staff whose function it is to communicate with public officials and emergency responders and the communications duties and responsibilities assigned to these dedicated staff.
- AG-20) Describe when the criteria for initiating contacts with public officials and emergency first responders were satisfied from August 2, 2020 up to and through complete system restoration and repair.
- AG-21) Describe when contact with public officials and emergency first responders began concerning the Storm.
- AG-22) Describe any failures to initiate contact with public officials and emergency first responders during the as called for in the emergency response plan and describe the reasons for any such failures.
- AG-23) Describe all efforts to establish and maintain communications with news media and customers in the affected areas from August 2, 2020 up to and through complete system restoration and repair.
- AG-24) Please describe the performance of the company's telephone and internet services to customers for both reporting outages by customers and for informing customers and the public of the status of restoration efforts.
- AG-25) Please describe the frequency and nature of all simulation (field, tabletop or other) exercises you perform with your storm preparation protocols, including your internet and phone

customer response systems, as well as the maximum number of outages these simulations are designed to prepare for. Please provide all results from these exercises.

AG-26) Please provide the numbers of full time trained lineworkers employed by the Company on January 1 for the years 2010 through 2020. Provide the numbers that were budgeted in the Company's relevant rate proceedings for those years. Please provide an explanation for any discrepancies in those numbers.

Respectfully submitted,  
WILLIAM TONG  
ATTORNEY GENERAL

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I hereby certify that a copy  
of the foregoing has been mailed,  
electronically filed, and/or  
hand-delivered to all known  
parties and intervenors of record on  
the above referenced date.

/s/ John S. Wright  
John S. Wright  
Commissioner of the Superior Court