



COUNCIL ON ENVIRONMENTAL QUALITY

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July 25, 2019

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 19-01-25 - PURA 2019 Biennial Report To The General Assembly
Concerning Its Review Of Each Electric Distribution Company's Vegetation
Management Practices

Dear Mr. Gaudiosi,

The Council is writing to request a determination by PURA regarding whether a utility can forestall UPZ work in a town and only provide emergency trimming.

At yesterday's meeting of the Connecticut Council on Environmental Quality, a number of citizens raised concerns regarding the existing and proposed vegetative management (VM) practices by the United Illuminating (UI) in their service territory.

Residents of Fairfield alleged that UI is not performing routine trimming and removal of trees within the Utility Protection Zone (UPZ). As an alternative to this VM in the UPZ, they reported that UI proposes to primarily undertake what it terms Targeted Risk Management (TRM) and only prune or remove trees that are in direct contact with the conductors or have visible signs of burning, which may not be adequate to protect public safety and the environment. They contend that by invoking C.G.S. Sec 16-234(e), UI is able to conduct TRM without input from the Fairfield Tree Warden and notice to residents. Noting the two recent deaths in the town from fallen trees, the Fairfield residents stressed that they want to have UPZ trimming to proceed and want it to be done in coordination with the Tree Warden.

Another attendee, from Hamden, reported that in her town, UI was performing normal UPZ maintenance and is working in conjunction with the Tree Warden. That person expressed a concern that if the policy being implemented in Fairfield is allowed to stand it will become a precedent for tree maintenance in other towns as well.

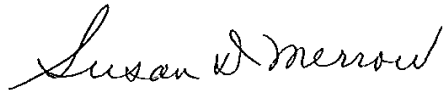
Eric Hammerling of the Connecticut Forest and Park Association expressed the opinion that there is a need to clarify whether a utility may reduce UPZ maintenance, substitute TRM and be in compliance with its regularly planned, ongoing VM responsibilities. The Fairfield residents expressed concern that Sec 16-234(e) is being used by UI in non-emergency situations to circumvent notice to abutters and tree warden consultations.

This is a matter of high importance. If in 2019, UI maintains the same number of completed VM miles per expended dollar as it did in 2018, the Council anticipates that approximately 160 miles of roadside VM will be completed. It is important that there be clarity on exactly how this will be conducted.

This degree of concern or confusion regarding practice and policy are evidence of a need to define to what extent a utility can forestall UPZ work in a town and only provide emergency trimming, if that is actually the case in Fairfield. Consequently the Council resolved to request from PURA clarification on this point.

Additionally, those in attendance reported that numerous other residents share their concern and will need more time to draft and submit comments regarding PURA's draft decision in this docket by the July 29 deadline. The Council resolved to include in this submittal a request that the comment deadline be extended in the interest of public accessibility.

Sincerely,



Susan D. Merrow
Chair

c. Katie Dykes, Commissioner Department of Energy and Environmental Protection.

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