

**PUBLIC UTILITIES REGULATORY AUTHORITY
REVIEW OF THE PUBLIC SERVICE COMPANIES'
RESPONSE TO 2011 STORMS
DOCKET NO. 11-09-09
DIRECT TESTIMONY OF
ALICE A. MILLER,
DONNA M. DEVITO,
AND MICHAEL W. TOWNSLEY
ON BEHALF OF THE
OFFICE OF CONSUMER COUNSEL
APRIL 11, 2012**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Alice Miller. I am a consultant affiliated with Townsley Consulting Group,
3 LLC. My business address is 9 Brookline Drive, Clifton Park, New York 12065.

4

5 My name is Donna DeVito. I am a consultant affiliated with Townsley Consulting
6 Group, LLC. My business address is 95 South Main Avenue, Albany, New York 12208.

7

8 My name is Michael Townsley. I am the Principal and sole owner of the Townsley
9 Consulting Group, LLC. My business address is 2 Fox Hill Road, Old Saybrook, and
10 Connecticut 06475.

11

12 **Q. PLEASE SUMMARIZE YOUR EDUCATION AND BUSINESS EXPERIENCE?**

13 A. **(Miller)** In 2010, I retired from the New York Department of Public Service where
14 I was Chief of Consumer Advocacy in the Office of Consumer Policy, dealing primarily
15 with service quality, consumer protection, and low income issues. As part of that job, I
16 oversaw utility communication with customers, including communication during major
17 service disruptions, and prepared reports on utility performance in the aftermath of major
18 outages. I also supervised staff that provided expert testimony on consumer issues in all
19 major rate cases. Over the course of my career I have participated in dozens of prudence
20 and/or audit cases (including Consolidated Edison's Washington Heights' outage report

1 and reports to the Governor on restoration of utility service in the aftermath of the World
2 Trade Center collapse).

3
4 In 2011, the Connecticut Office of Consumer Counsel hired me to provide expert
5 testimony in two cases. These involved review of the electric and gas utilities' energy
6 efficiency proposals and an examination of Connecticut Light and Power's smart grid
7 proposal.

8
9 My 30 years of experience with the utility industry has primarily been in the areas of
10 review of utility operations, evaluation of consumer issues, prudence reviews, energy
11 efficiency, renewable energy, tariff and rate analysis, retail access, and strategic planning.

12 Over a period of twenty years I was a section chief at the New York Department of
13 Public Service in various capacities, including management responsibilities in the Office
14 of Consumer Policy (Consumer Advocacy), Office of Energy Efficiency and the
15 Environment (Energy Efficiency Design and Implementation), and Office of Electricity
16 and Environment (Energy Efficiency and Renewables). I hold a B.A. (with highest
17 distinction) and an M.A. from the University of Iowa and an M.B.A. from SUNY-
18 Albany.

19
20 My resume is included as Exhibit __ (TCG-1-1).

1 **(DeVito)** In 2011, I retired from the New York Department of Public Service (DPS),
2 where my most recent position was Utility Consumer Program Specialist IV in the Office
3 of Energy Efficiency and the Environment, evaluating utility efficiency program process
4 and impact evaluations, and reviewing program compliance of New York State utilities.
5 In my thirty-one years at DPS and three years at the New York State Consumer Protection
6 Board (CPB), I worked in the areas of utility accounting, energy efficiency, consumer
7 services, customer outreach and advocacy programs, and reviewing utility management
8 practices.

9
10 In the last fifteen years, I have provided expert testimony in over ten major New York
11 State utility rate cases and testified before the Public Service Commission on consumer
12 issues in the areas of service quality performance and measurement; utility low income
13 program design and rate impact; economic development program oversight; and customer
14 related emergency preparedness program protections, oversight, and compliance. With
15 over thirty-four years of utility experience, I have worked and supervised in the following
16 areas: oversight of utility service performance and consumer protection compliance;
17 impact analysis of tariff incentives for economic development programs; dispute
18 resolution as a business advocate in such areas as consumer protection issues, billing
19 disputes, tariff application, franchises disputes, and stray voltage complaints;
20 development and implementation of statewide DPS customer education programs,
21 including preparation and presentation of major electric outage evaluation reports; and
22 comprehensive utility management and operational audits. In addition, I was a utility

1 accountant for seventeen years in the DPS's Accounting Division. I have a Bachelor's
2 Degree in Accounting from Siena College.

3
4 My resume is included as Exhibit __ (TCG-1-1).

5
6 **(Townesley)** In 2011 I retired from the New York Department of Public Service (DPS) as
7 a Deputy Director. In my career at DPS I worked in the Offices of: Industry and
8 Governmental Relations, Energy Efficiency and the Environment, and Electricity and the
9 Environment.

10 During my work at DPS I provided oversight and guidance to Staff investigations such as:
11 extended power outages in Westchester County, New York; an assessment of failures and
12 the rebuilding of the Queens, New York, Long Island City (LIC) network following an
13 extensive power outage; and a management audit of Consolidated Edison Company of
14 New York, Inc.'s (Con Edison) electric emergency outage response program. I was also a
15 member of the DPS staff's LIC network outage prudence case settlement negotiations
16 team.

17
18 I have over 40 years of utility industry experience working in both the public and private
19 sectors serving in management and consulting roles. Areas of professional experience
20 include: strategic business and operational planning; power system facilities planning and
21 design; retail regulatory processes; deregulated (competitive) and regulated retail energy

1 markets; market planning; market management; financial and cost of service analysis; and
2 research & development portfolio planning and management. My professional experience
3 includes working in utility management positions within two large utility holding
4 company systems and working for an engineering and design consulting firm whose
5 clients were mainly utilities and industrial concerns with large electric demands. I have
6 testified before state public service commissions in Connecticut, Massachusetts, New
7 Hampshire, and New York and before state siting councils, legislative bodies, and other
8 state agencies.

9
10 My educational background includes a Master of Business Administration from
11 Rensselaer Polytechnic Institute and a Bachelor of Science Degree in Electrical
12 Engineering from Purdue University.

13
14 My resume is included as Exhibit __ (TCG-1-1).

15
16 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

17 A. We are testifying on behalf of the Office of Consumer Counsel (OCC), which hired
18 Townsley Consulting Group LLC (TCG) to assist in its review in Docket 11-09-09,
19 “PURA Investigation of Public Service Companies’ Response to 2011 Storms.”

1 **Q. PLEASE DESCRIBE THE SCOPE OF YOUR REVIEW.**

2 A. OCC retained the Townsley Consulting Group, LLC to review the actions of
3 Connecticut's public service utilities during Tropical Storm Irene (Storm Irene) and the
4 October 2011 snowstorm (October Nor'easter) and to make recommendations to improve
5 overall performance in the future. We have evaluated all materials presented in Docket
6 11-09-09 and conducted surveys and interviews to assess Connecticut utilities'
7 communication efforts with customers in anticipation of Storm Irene and the October
8 Nor'easter and in their aftermath.

9
10 More specifically, TCG developed and administered a survey of the town governments
11 served by the Connecticut Light & Power Company (CL&P) and the United Illuminating
12 Company (UI) regarding their experiences in communication with the utilities during the
13 storm restoration efforts associated with Storm Irene and the October Nor'easter. TCG
14 and OCC Staff also met with municipal officials, representing over twenty towns
15 throughout the state, to hear first-hand about their individual experiences. TCG
16 consultants also met with representatives from both utilities who were actively
17 engaged in communicating with customers and local governments during the storm
18 restoration processes. TCG reviewed and analyzed over 1,000 customer complaints
19 submitted in this proceeding and reviewed reports prepared by Witt Associates, the
20 Governor's Two Storm Panel, and Davies Consulting.

21
22 Our testimony focuses on areas where improvement efforts are likely to be most
23 beneficial in creating a complete record in this docket, and that have not been adequately

1 developed on the record in this docket. Insofar as there are issues that have already been
2 adequately developed in the evidentiary record, and thus did not require the submission
3 of testimony to further develop the record, OCC will provide further analysis and
4 recommendations with respect to those issues in its brief.

5
6 **OVERVIEW OF COMMUNICATIONS EFFORTS**

7 **Q. PLEASE IDENTIFY THE TOPICS THAT YOU WILL BE COVERING IN THIS**
8 **TESTIMONY.**

9 A. This testimony will examine the communications efforts of Connecticut's major utilities
10 with the public and with government officials associated with Storm Irene and the
11 October Nor'easter. There has been extensive review of these utilities' efforts during
12 Storm Irene and the October Nor'easter by a variety of entities [e.g. Witt Associates in
13 the report *Connecticut October 2011 Snowstorm Restoration Report*, dated December 1,
14 2011; the Two Storm Panel in its *Report of the Two Storm Panel*, dated January 9, 2012;
15 and Davies Consulting in the report *Connecticut Light and Power Company's Emergency*
16 *Preparedness and Response to Storm Irene and the October Nor'easter*, dated February
17 27, 2012. Our conclusions seek to expand upon the conclusions in those investigations
18 and are based on review of documents, including interrogatory responses and consumer
19 complaints filed in the docket; interviews; and the results of a survey with town officials
20 that we conducted. Our review examined the actions of electric, landline telephone,
21 cable, natural gas, and water utilities. This testimony focuses primarily on electric

1 utilities because their actions led to the largest number of customer and municipal
2 comments and concerns.

3
4 While this testimony addresses communication issues that arose with restoration of
5 electricity, telecommunications and water utility service, it primarily focuses on the
6 restoration efforts of Connecticut's electric distribution companies, The Connecticut
7 Light and Power Company (CL&P) and The United Illuminating Company (UI)
8 (collectively ("the EDCs")). Of these two utilities, CL&P received by far the most
9 complaints about its communication efforts and will be the focus of the majority of the
10 analysis that follows.

11
12 Testimony offered in the Storm Irene Legislative Hearings, held in September 2011,
13 highlights the magnitude of the communications effort undertaken by CL&P in the face
14 of widespread electrical outages across the state of Connecticut. CL&P made over 1.1
15 million automated phone calls to inform its customers of its preparations and to remind
16 them about safety precautions to take during a prolonged outage. In addition, the
17 company sent approximately 586,000 text messages to its customers (see response to
18 Interrogatory AG-9) and made 250,000 outbound calls to verify with customers that
19 their power had been restored. As a result of Storm Irene, approximately 671,700 CL&P
20 customers lost their electric service (see supplemental response to Interrogatory EI-21).
21 CL&P's call center handled approximately 1.03 million calls from customers in 10 days,
22 about 23% of the company's normal annual call volume (see response to Interrogatory
23 CSU-4).

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Less than two months later, CL&P faced an even more difficult outage event with the October Nor'easter. The heavy snow falling on trees that still had leaves led to extensive tree damage and many downed wires and utility poles, leaving 830,000 customers of CL&P's 1.2 million customers without power for up to eleven days (see CL&P's response to Interrogatory OCC-34 Attachment 1). CL&P's outage map on its website received more than five million hits (see response to CSU-38). Unlike Storm Irene, when warm temperatures during the restoration effort led CL&P to warn crews of the dangers of heat stress (see Storm Safety Message for 9/3/11 response to Interrogatory AG-6), during the restoration for the October Nor'easter many customers complained of cold temperatures in their homes that posed a potential danger, especially to the young and the elderly.

UI also faced a major communications challenge with Storm Irene. Outages lasted from August 28 through September 5, and more than 158,000 customers lost power, a substantial number for a utility with approximately 325,000 customers (from Storm Irene Legislative Hearings held on 9/19/11 with James P. Torgerson, Tony Vallillo, and John Prete testifying). UI's website received more than 201,000 views of its outage map (see response to Interrogatory CSU-7) and the company responded to 106 media inquiries (see response to Interrogatory CSU-8). However, during the October Nor'easter, the storm's impact on the UI territory was much less significant than in CL&P's territory; all of UI's customers had power restored within five days (see UI response to Interrogatory OCC-143-1). This large difference in the amount of time

1 customers went without power goes a long way in explaining why the reaction of CL&P
2 customers was so much more intense than that of UI customers.

3
4 During Storm Irene and the October Nor'easter, both electric utilities expanded the role
5 of utility "liaisons" working with municipalities (see CL&P and UI responses to
6 Interrogatory AG-8). The liaison program places utility employees within municipalities'
7 emergency control centers to facilitate communication about restoration efforts. This
8 system worked reasonably well for UI, which had been using the approach for many
9 years, but as a recently reintroduced program for CL&P, it did not work as well as hoped.
10 Details of these communication difficulties are included in this testimony.

11
12 As part of our analysis, TCG reviewed customer complaints filed in this docket. UI
13 experienced a more manageable number of outages, a shorter total outage time, and
14 received significantly fewer complaints than CL&P. The October Nor'easter became a
15 public relations nightmare for CL&P, largely because of frustration on the part of
16 customers who were out of service for extended periods of time, many for the second
17 time in less than two months. Review of the complaints revealed that many customers
18 did not believe the estimated restoration time information that CL&P provided,
19 considering it inaccurate and insufficiently detailed for planning purposes.

20
21 A common theme in the customer complaints and feedback we received from town
22 officials is the need for reliable, up-to-date information that can be used for planning
23 purposes. During extended electrical outages, towns and individuals need to make

1 serious decisions that involve the safety of people, property, and animals. The need for
2 this information is especially acute in the case of life-support and other vulnerable
3 customers. When information needed for decision making is not available or the
4 available information is not helpful, customers can become frustrated and anxious. In
5 addition, the increasingly fast-paced digital media environment we live in is raising
6 customer expectations for information that they believe should be available to them.

7
8 During the October Nor'easter, CL&P's communication systems were tested as they had
9 never been before. The unprecedented magnitude of the outages served to highlight
10 flaws in CL&P's communication strategies. Many of the improvements that we
11 recommend in this testimony for CL&P would also be helpful for UI. Our
12 recommendations describe changes that will move both utilities closer to best practices in
13 the electric utility industry and will help them respond better to customer and
14 governmental needs the next time a major outage event occurs.

15
16 Our analysis of the utilities' communication efforts will focus on five topics, with
17 respect to which we can provide information and analysis that expands upon and
18 develops evidence already provided in this docket. These areas are:

- 19 1. An analysis of customer complaints filed in this docket.
- 20 2. An examination of CL&P's decision to provide reimbursement to selected
21 customers in the aftermath of the October Nor'easter.
- 22 3. A review of the EDCs' use of electronic media to communicate with customers
23 during major outages, including both webpages and social media.

1 4. A comparison of the EDCs' practices for communicating with life support and
2 critically ill patients with those of best practice utilities.

3 5. A description of the results of interviews we conducted with town officials and a
4 survey we conducted on the effectiveness of the use of the EDCs' town/municipal
5 liaisons and of utilities' communication efforts with Connecticut's towns.

6
7 **ELECTRIC UTILITIES' COMMUNICATION WITH INDIVIDUAL CUSTOMERS**

8 **Q. PLEASE DESCRIBE YOUR REVIEW OF CUSTOMER COMMENTS FILED IN**
9 **THIS DOCKET.**

10 A. In response to interrogatories, CL&P reported that its call center received 4,524
11 complaints for Storm Irene (see response to Interrogatory CSU-8) and 4,579 complaints
12 related to the October Nor'easter (see response to Interrogatory CSU-23). CL&P
13 provided a breakdown of these complaints by category that shows that they came from
14 throughout CL&P's service territory and from all customer classes, but primarily from
15 residential customers.

16
17 In addition, many customers and some public officials provided written comments, either
18 in the form of emails or letters. TCG has reviewed the customer comments filed in
19 Docket No. 11-09-09. Over 1,000 customer comments had been received as of February
20 29, 2012, and new comments continue to be received from customers more than five
21 months after the storm. These comments are primarily from residential customers, but
22 business customers and public officials are also represented. The customer comments

1 primarily deal with restoration delays and communication problems in the aftermath of
2 the October Nor'easter (October 28-29th, 2011).

3
4 The vast majority of the comments are about electric service and, of these, almost all of
5 the comments came from CL&P customers. Approximately 35 comments mention
6 telecommunication and cable company performance.

7
8 We have reviewed and categorized the comments filed in this docket to assess and
9 determine the major focus of customer concerns. The most frequently heard complaints
10 are listed below:

- 11 • CL&P's restoration performance during the October Nor'easter was unacceptable.
- 12 • CL&P's recovery efforts were slow to begin and service restoration took too long.
- 13 • CL&P and out-of-state crews were not visible in their town for days following the
14 storm.
- 15 • CL&P was not properly prepared, but should have been.
- 16 • Health and safety concerns need to be addressed.
- 17 • Lack of timely and accurate estimated restoration times made it hard for customers to
18 plan.
- 19 • CL&P should not be given a rate increase to cover storm restoration efforts until it
20 demonstrates that it is doing a better job.
- 21 • Connecticut electric rates are high and the service received in return is not worth what
22 customers pay.

- 1 • The repeated and extended electrical outages make customers feel like they are living
- 2 in a third world country.
- 3 • CL&P management and/or state government should be held accountable.
- 4 • An investigation into CL&P's handling of the outage is needed.
- 5 • CL&P should provide reimbursement to customers for such things as perishable food
- 6 and medicine, and other costs experienced by the customer.
- 7 • CL&P used an unfair process to provide reimbursement to selected customers.
- 8 • CL&P should reduce customer bills to compensate for the prolonged service outage.
- 9

10 **Q. PLEASE PROVIDE A MORE DETAILED DESCRIPTION OF THE CUSTOMER**
11 **COMMENTS YOU REVIEWED CONCERNING THE OCTOBER**
12 **NOR'EASTER.**

13 A. Many of the comments included multiple complaints, with varying levels of frustration
14 expressed about the extended power outage. Many customers mentioned outages
15 associated with Storm Irene and said that lessons learned from that outage had not been
16 implemented. At least nine letters came from public officials responding to comments
17 received from their constituents, sometimes including their personal observations as well.
18
19 Reading the complaint letters and emails from across Connecticut, it is apparent that the
20 number of recent outages and their duration has affected the well-being of many CL&P
21 customers. Over 90% of total customer complaints voiced frustration and/or contained
22 generally negative comments about CL&P's performance during the outage, either in
23 terms of unacceptable overall performance, inadequate restoration communication with

1 customers, and/or concerns about grid reliability. Customer complaints often addressed
2 two or more areas of discontent, but are counted here as one complaint. The percentage
3 of comments received for each topic that we tallied is based on a total of 1,060
4 complaints filed. See Exhibit __ (TCG-1-2), Table A: Summary of Filed Customer
5 October Nor'easter Storm Correspondence to view the tabulation all comments by
6 category and see Exhibit __ (TCG-1-3), Table Summary of October Storm Written
7 Comments -Table B, to view a summary of many of the written comments provided by
8 customers.

9
10 The comment counts, statistics, and percentages that follow provide a more specific
11 breakdown of customer issues and concerns. With regard to overall performance, 47%
12 specifically stated that CL&P's performance was unacceptable. Among the complaints of
13 this type, many customers said that multiple day outages are becoming common events,
14 with many of them questioning the electric grid's reliability. Some people even stated
15 that they did not believe the storms or events were severe enough to warrant the duration
16 of the outages. 32% of comments stated that service restoration took too long and initial
17 recovery efforts were slow to begin. They often mentioned the similarity to restoration
18 efforts for Storm Irene, two months earlier, and believed that lessons learned had not
19 been implemented. 11% of the complainants either had already requested reimbursement
20 from the utility and/or believed they should be reimbursed for utility customer service
21 charges during the outage or for food losses, hotel bills, or other costs they had incurred.
22 The number of reimbursement complaints increased in December 2011 when CL&P

1 offered a bill credit to customers that had been without service after noon on November
2 5, 2011, a cut-off time that many customers found arbitrary and unfair.

3
4 The most serious complaints came from customers with health and safety concerns. Over
5 18% of complaints addressed residential customers' concerns about health, safety, and
6 security concerns. These complaints dealt with the length of the outage and its effect on
7 sick and elderly customers and the limited shelter locations and resources available to
8 assist them, limited planning for the number of people displaced and moved to shelters,
9 and lack of action in response to reports of downed electric wires. Many of these
10 comments expressed intense emotions and described the impact of the outage and the
11 often overwhelming problems they encountered trying to help themselves and family
12 members. Some customers found it difficult to continue to cope with the effects of the
13 extended outage. This issue is addressed further below starting at page 44.

14
15 Many customers strongly voiced their discontent about any attempt by CL&P to obtain a
16 rate increase to pay for service restoration. 11% of the comments noted that
17 Connecticut's utility rates are some of the highest rates in the nation and they believe that
18 ratepayers get inadequate service in return; many of these comments called for no rate
19 increases for CL&P and many spoke of excessive utility profits and corporate greed.
20 18% of the complaints received stated that utility management was either incompetent,
21 received excessive pay, should be fired or replaced, and/or said that CL&P and its senior
22 management should be held personally or financially accountable. 9% of the complaints
23 called for an investigation into the causes of the extensive duration of the outage and

1 lengthy service restoration, many stating that CL&P should be held accountable for the
2 failure to restore service in a timely manner and for failure to offer adequate leadership.
3 Many comments requested that Connecticut's Governor intercede with the utilities and
4 take necessary actions to improve/change restoration processes. Nearly 70% of the
5 complaints received from customers that have been filed in this docket to-date were sent
6 directly to the Governor's office.

7
8 In terms of the overall restoration effort, 16% spoke of the lack of visibility/presence of
9 utility storm crews in the first week of restoration efforts and commented on inefficient
10 use of mutual aid assistance from other utilities. Many customers said that they had not
11 seen crew trucks days after the storm in their neighborhoods. Others spoke of seeing
12 repair trucks sitting idle, with crews waiting for hours. In addition, many complainants
13 considered crew staffing levels insufficient to handle restoration needs; this was
14 mentioned in 12% of the comments. 4% of comments suggested that non-payment of
15 mutual assistance contractors' bills from the Storm Irene restoration, two months earlier,
16 may have contributed to the delay in obtaining assistance for this event. 15% of the
17 complainants believed that CL&P was not prepared for the storm, but should have been
18 based on the weather information available, and/or that CL&P had not properly
19 maintained equipment and infrastructures on an ongoing basis.

20
21 The customer comments emphasize the need for CL&P to develop improved
22 communications skills in all areas of its operations. Based on the comments we
23 reviewed, it is clear that customers believe that CL&P management needs to:

- 1 • communicate timely, relevant information to customers with realistic estimated
- 2 restoration times that are site specific and updated frequently;
- 3 • learn from its mistakes and improve performance in future outage events;
- 4 • improve outreach to elderly and medically vulnerable customers;
- 5 • do a better job of using crew resources effectively;
- 6 • improve coordination with local governments; and
- 7 • do a better job of trimming trees and maintaining infrastructure.

8

9 **Q. DID ANY CUSTOMERS OFFER SUGGESTIONS FOR IMPROVEMENT?**

10 A. Yes. Although most customer comments were generally negative, some customers
11 did offer improvement opportunities. Increased tree trimming and underground wiring
12 were suggested most often. Customer suggestions are shown below.

- 13 • 12% of customers suggested more and better tree trimming.
- 14 • 5% of customers suggested undergrounding of wiring.

15 The following are representative of other customer suggestions received:

- 16 • Visible house numbers may help restoration efforts.
- 17 • Regulators should institute penalties for lengthy outages and/or prolonged restoration
18 times.
- 19 • There should be an investigation of CL&P's storm restoration performance.
20 Connecticut should monitor implementation of recommendations and ongoing
21 compliance with initiatives.

- 1 • Connecticut should address health and safety concerns, such as performing prompt
2 assessment and restoration of downed wires, establishing notification and safety plans
3 for elderly and sick customers, and fixing non-functioning traffic lights.
- 4 • There is a need for better communication and prioritization with local governments
5 on restoration activities.
- 6 • CL&P needs to have improved communication with telephone and cable companies
7 regarding restoration efforts.
- 8 • There should be restoration criteria and protocols for cable and telephone companies.
- 9 • CL&P should improve existing communication methods, such as websites and radio
10 broadcasts.

11

12 **Q. WHAT CONCLUSIONS CAN YOU DRAW FROM YOUR REVIEW OF**
13 **CUSTOMER COMPLAINTS IN THIS DOCKET?**

14 A. The extremely large number of customer comments in this docket provides a clear
15 indication of customer frustration and lack of trust about CL&P's past and most recent
16 storm restoration efforts. Customers are demanding more accurate and timely
17 information that they can use to make informed decisions about what they should do
18 when a major outage occurs. Without such information customers feel unable to make
19 informed decisions for the health and safety of their families. Complainants also
20 stridently called for utility accountability for the impacts that storm outages have on
21 customers and communities, with consequences for inadequate communication with
22 customers and delayed restorations. Many customers asked that CL&P either be fined or

1 be denied further rate increases until it demonstrates that it has made changes to minimize
2 the length of storm outages in the future.

3
4 **Q. HOW WOULD YOU DESCRIBE CUSTOMERS' REACTIONS TO CL&P'S**
5 **DECISION TO PROVIDE REIMBURSEMENT TO SELECTED CUSTOMERS?**

6 A. CL&P's corporate policy is to not provide reimbursement to those that lose power during
7 extended outages. The company's response to Interrogatory CSU-40 provides the
8 rationale for this policy, stating "The bulk of the non-generation charges are billed via
9 consumption based charges (i.e., per kWh or kW). To the extent usage was reduced due
10 to the outages, the non-generation portion of the bill reflects the reduced usage (i.e., kWh
11 or kW), so that an appropriate 'credit' already exists. As it relates to the fixed portion of
12 CL&P's tariff charges (i.e., the Customer Charge), this component recovers the fixed
13 (non usage based) costs of providing delivery service to our customers. Because the
14 Company's cost of providing that delivery service was not reduced as a result of the
15 outages it would be inappropriate to provide a credit for this portion of customer bills."

16
17 Despite this policy, Northeast Utilities' (NU) shareholders decided, as a good will
18 gesture, to provide the Governor of Connecticut with a \$10 million fund that could be
19 used to reimburse residential customers most affected by electrical outages associated
20 with the October Nor'easter. The Governor recommended that the amount of the fund be
21 increased to \$30 million and that it be administered by the utility in such a way that it

1 would touch a large number of customers. CL&P worked with Kenneth Feinberg, a
2 consultant who had experience with compensation to customers in several high profile
3 situations (see response to OCC-132). He reportedly recommended an approach that
4 would offer a credit of between \$100 and \$200 (the amount per customer would depend
5 on how many eligible customers applied for the credit) on February 2012 bills for CL&P
6 residential customers that were without power after noon on Saturday, November 5, 2012
7 as a result of the October Nor'easter. This would give a credit to the last 25% of
8 customers to have their power restored (see response to Interrogatory OCC-124) and
9 work with the pre-established \$30 million funding level.

10
11 On January 18, 2012 we spoke with four executives from CL&P: Marie T. van Luling
12 (Vice President, Communications), William J. Quinlan (Senior Vice President,
13 Emergency Preparedness), Jessica Cain (Director, Customer Solutions), and David
14 Radanovich (Manager, Communications). In this testimony we will refer to that
15 discussion as the January 18 meeting with Senior Executives. At that meeting when we
16 asked the CL&P senior executives about the reasons for offering reimbursement, they
17 said that the company had set a restoration goal and an associated expectation, and then
18 failed to deliver on it. This is a sentiment expressed in a Thank You advertisement that
19 the RDW Group advertising firm helped CL&P prepare. That advertisement, which
20 appeared starting on November 13, 2011, read, in part, "The unprecedented early fall
21 snowstorm that tore through Connecticut was difficult on all of us. We understand,
22 especially for those without heat and water, being without power is extremely frustrating.

1 We're sorry so many were adversely affected by this storm, and we thank you for your
2 patience and understanding throughout this difficult time. As we assess what happened
3 in the wake of this historic storm, let us say we know that despite the extraordinary
4 efforts of everyone involved, for many of you, we did not meet your expectations" (see
5 response to Interrogatory AG-124).

6
7 The CL&P senior executives saw the reimbursement as a goodwill gesture to their
8 customers. They acknowledged that this was not a perfect process but believed that no
9 matter what process they chose, there would be some unhappy customers.

10
11 Most of the complaints about reimbursement were filed after CL&P announced that only
12 selected customers would receive compensation. These complaints came from customers
13 unhappy with CL&P's reimbursement plan (a total of 123 complaints dealt with
14 reimbursement issues). The complaints generally dealt with the following topics:

- 15 • Customers who were not eligible for the rebate considered the policy unfair. They
16 had also suffered.
- 17 • There was reimbursement for only the October Nor'easter and not for previous
18 storms.
- 19 • Only customers out five days or more were reimbursed; food had spoiled long before
20 that.
- 21 • Refunds should be automatic.

- 1 • CL&P should waive the customer charge during storm outages, like telephone and
2 cable companies do.

3 In interviews with some officials in towns served by CL&P, they indicated that a better
4 (or alternative) use of the NU-provided reimbursement funds would have been to fund
5 town purchases of additional emergency back-up generation.

6 UI did not provide reimbursement to customers that lost power during either Storm Irene
7 or the October Nor'easter.

8

9 **Q. DO YOU HAVE ANY RECOMMENDATIONS ABOUT CUSTOMER**
10 **REIMBURSEMENT DURING PROLONGED SERVICE OUTAGES?**

11 A. Extended electrical outages have a significant financial impact on customers.
12 Should Connecticut's Public Utilities Regulatory Authority (PURA) consider whether to
13 require reimbursement to customers for spoilage of food and/or medication during
14 prolonged power interruptions, the Consolidated Edison Company of New York, Inc.
15 (Con Edison) uses a customer reimbursement model which could be instructive. Con
16 Edison provides payments to residential and small business electric customers for
17 documented losses of refrigerated perishables. These payments are capped at a total of
18 \$15 million per storm. If the reimbursement cap is reached, this \$15 million is prorated
19 and allocated among eligible customers. Eligibility is proven by providing an itemized
20 list for food loss claims within 30 days for claims up to \$200. Proof of loss is required
21 for amounts over \$200, with a maximum reimbursement level for food spoilage of \$450.

1 Claims for losses of perishable medicine require an itemized list and proof of loss and is
2 independent of the \$450 maximum for spoiled food.

3
4 If PURA or the state legislature determines that a compensation model is appropriate,
5 OCC believes that eligibility for compensation should be based on being out of service
6 beyond a specified amount of time, and that both food and medicine should be eligible
7 for reimbursement if spoiled. To the extent any such program is paid for by ratepayers,
8 in order to reduce the impact of such a program on rates, OCC believes that a
9 reimbursement program should be primarily directed to limited income (or hardship)
10 customers and the overall amount of the reimbursement should be capped by PURA, on a
11 per storm basis, with reimbursement of up to \$150 for food and \$200 for medications,
12 with a provision for adjustments to account for inflation. If it is found that the
13 restoration time was greater than it should have been, or if the Emergency Plan was not
14 followed, or if other PURA developed criteria were violated, shareholders should absorb
15 all or a portion of the cost of the customer credits.

16
17 **Q. PLEASE DESCRIBE THE EDCS' USE OF ELECTRONIC MEDIA TO**
18 **COMMUNICATE WITH THEIR CUSTOMERS AND GOVERNMENTAL**
19 **OFFICIALS DURING PROLONGED SERVICE OUTAGES.**

20 A. During Storm Irene, the EDCs used a variety of media to attempt to get information to
21 their customers. This was especially true of CL&P, where all of the 149 towns in its

1 service territory were affected by the storm. In addition to the traditional methods of
2 press releases, media interviews, and radio announcements, CL&P provided customers
3 information via its website, Twitter, Facebook, YouTube, Flickr, and customers' cell
4 phones. UI used the same media types with the exception of Flickr and the cell phone
5 information.

6
7 As CL&P explained in testimony during Storm Irene Legislative Hearings, held in
8 September 2011, it tried to provide town-specific information in its customer outreach. It
9 heard back from communities that they did not want to hear about work centers and
10 circuits but preferred to hear information that could help their municipality with its own
11 planning, such as how many crews were working in their towns and what streets were
12 affected. CL&P also acknowledged that it received feedback showing frustration on the
13 part of its customers as a result of the length of the outage. This frustration with a
14 perceived lack of communication by some became even more pronounced during the
15 October Nor'easter.

16
17 Our review of customer complaints showed that no matter what type of media the
18 companies used, customers' primary concern was getting accurate information that they
19 could use to plan how best to deal with an extended electrical outage. They needed to
20 make decisions about such things as whether they should stay in their home or go to a
21 motel or shelter or move in with relatives, whether they should move elderly parents, or
22 whether they should purchase a back-up generator. It was evident in our analysis of
23 customer complaints associated with this docket (see above) that many customers found

1 it unacceptable that they could not obtain reliable information needed to make these types
2 of decisions. Our emphasis in evaluating the companies' use of electronic media was the
3 extent to which it met customers' need for reliable, accurate information that could be
4 used for their personal emergency planning.

5
6 **Q. PLEASE DESCRIBE THE UTILITIES' PRESENTATION OF ESTIMATED**
7 **RESTORATION TIMES AS CUSTOMERS EXPERIENCED THEM DURING**
8 **STORM IRENE AND THE OCTOBER NOR'EASTER.**

9 A. CL&P and UI both have websites that provide information about estimated restoration
10 times during storm outages, including outage restoration maps. The webpages containing
11 the outage maps received large numbers of hits during both storms, indicating that
12 customers sought out this information.

13
14 During Storm Irene and the October Nor'easter, the information shown on the outage
15 maps tended to be presented at a large-scale level, typically a town at a time. In the case
16 of CL&P, the map shows different colors representing the percentage of the population in
17 a given town that is without power. Information about restoration during major outages
18 is also available in tabular form. UI could not provide historical copies of outage maps
19 to show how they looked during the storm outages, but the maps UI did provide appear to
20 report the number of outages at the time, by town.

21
22 As has been found in other reviews, CL&P's use of Sunday (November 6) at midnight as
23 the time when 99% of customers impacted by the October Nor'easter, system-wide,

1 would have service restored became a major communication issue. CL&P used this date
2 and time in all of its messaging throughout Connecticut. A review of documents filed in
3 the docket shows that even on Sunday morning (the date of the 99% completion target)
4 CL&P continued to use the message that restoration would be 99% complete by midnight
5 on its various media sites. Briefing notes in preparation for news conferences and
6 interviews gave recommended responses to questions that might arise. In response to a
7 potential observation that CL&P's own crews were saying that 99% restoration by
8 Sunday was unattainable, the suggested utility response was that sometimes the people in
9 the trenches cannot see the big picture (see response to Interrogatory AG-120, Briefing
10 Sheet 1105 AM).

11
12 It is worth noting that CL&P's outage management system predicted that restoration
13 would not be completed by Sunday and would instead take three additional days (until
14 Wednesday). Nevertheless, CL&P tenaciously clung to its original estimate.

15
16 In response to Interrogatory OCC-326, UI provided the results of a survey it did of its
17 customers after Storm Irene. Although that survey showed that the majority of its
18 customers thought that UI did a good job given the circumstances, more than 40% of
19 respondents characterized the information they received from UI as inaccurate. Clearly,
20 there is considerable room for improving information given to customers during major
21 outages. It is also worth noting that 73.8% of respondents to the UI survey considered
22 receiving accurate information about restoration times very important and another 17.0%

1 considered it somewhat important, clearly indicating that the vast majority of customers
2 wanted information they could trust on estimated restoration times.

3
4 In interviews we conducted with managers and call center employees at UI on January
5 19, 2012, these employees expressed a strong desire to improve the technology being
6 used, a sentiment echoed in interrogatory responses (see the response to OCC-145 for an
7 example of this). They genuinely seemed to desire access to more granular and detailed
8 information that could be used by call center personnel and in various media outreach
9 efforts to provide better information to customers. We heard the same sentiment from
10 call center employees at CL&P that we interviewed on January 18, 2012. However, at
11 the January 18 meeting with the CL&P senior executives, their descriptions of how
12 communications with the public should be improved did not touch on providing more
13 granular information to customers. Instead, they believed that in the future their
14 approach to providing estimated restoration times should focus on regional rather than
15 town-by-town information, similar to the communications method used by Florida Power
16 and Light. In this approach, during the first few days after the outage the company would
17 speak only of the percentage of customers on the system that was without electricity.
18 Over time this would be refined to the numbers of outages within each county, and finally
19 at the local level. The focus appeared to be on reporting the level of outages in regions,
20 not on when customers could expect to have service restored. We agree that information
21 needs to be general in the first hours of an outage, but the emphasis needs to be on getting
22 the best, most detailed information available to customers as quickly as possible.

1 The CL&P senior executives also related that CL&P had been using the 99% restoration
2 benchmark for years, but that in retrospect it implied a sense of precision that the
3 company might not always be able to achieve. They seemed to imply that their thinking
4 at the time of the interview was that the 99% restoration figure should be used only as a
5 company benchmark for internal planning, not for communication with the public. The
6 management executives also emphasized the importance of unity of message, which
7 includes using the same message in all media sources.

8
9 The extent to which these CL&P executives' response differs from the desire expressed
10 by those we spoke to in the utility call center is notable. Rather than focusing on
11 providing better information to customers as quickly as possible, the senior executives
12 seemed to be contemplating controlling and limiting the message being released to the
13 public to avoid setting an expectation that might later turn out to be incorrect.

14
15 OCC agrees that customers should not be given overly optimistic information, which they
16 may rely on to their detriment. However, review of customer complaints shows that
17 customers want information that is as accurate as possible. Therefore, OCC does not
18 believe that the solution is to limit information. Rather, the solution is to provide
19 accurate information in as much detail as possible.

20
21 **Q. PLEASE DESCRIBE THE OPERATION OF THE UTILITIES' WEBSITES**
22 **DURING STORM IRENE AND THE OCTOBER NOR'EASTER.**

1 During restoration efforts for Storm Irene and the October Nor'easter, both utilities
2 experienced some technical difficulties with their websites. Here are some of the glitches
3 that customers experienced:

- 4 • During Storm Irene, CL&P tweeted on 8/28 “we’re having technical difficulties
5 due to the amount of texts we’re receiving” and “our outage map is taking some
6 time to load due to high demand. Use the plain text report for faster loading.”
7 CL&P’s response to interrogatory AG-3, page 5 explains that the outage map was
8 moved to an AT&T site with more bandwidth. On 8/29 CL&P tweeted that its
9 outage map had been down but was now restored. CL&P’s response to
10 Interrogatory CSU-11 said that on 8/30 some customers heard on the interactive
11 voice recorder (IVR) or saw on the web site that their power had been restored
12 when in fact it had not been. On that date the CL&P map was at 100% utilization
13 and the company had to switch to use of a table to handle the heavy traffic. On
14 9/1 CL&P apologized to its customers and gave a new link for restoration
15 estimates. Finally, according to CL&P’s response to Interrogatory AG-95, on
16 September 2, 2011 the outage map displayed incorrect outage numbers. The map
17 was disabled and later returned to service.
- 18 • During Storm Irene, UI’s website was down for several days. As the company
19 explained in response to Interrogatory EL-5, this was “due to an abnormally high
20 number of hits on our website.”
- 21 • During the October Nor'easter, CL&P tweeted on November 6, “Have to take
22 web self-service tools offline at 12:30 to update for daylight savings time...should
23 be back approximately 2 a.m. – outage map still available”

1 Many of the complaints that TCG reviewed expressed anger over CL&P website
2 information that showed the same restoration date and time for many towns, representing
3 the target for 99% system restoration. Customers commenting on this said that they
4 found this information unhelpful.

5
6 TCG learned, in an interview held on January 16, 2012 with the New England
7 Independent System Operator (NE-ISO), that during the storm outages, the NE-ISO staff
8 reviewed CL&P and UI's websites to get an indication of the pace of the companies'
9 restoration efforts and the state of the electrical grid. NE-ISO personnel indicated that
10 the restoration information on the utilities' web sites was used, along with other
11 information, to inform their planning for the next day's power requirements for CL&P's
12 and UI's service territories. This illustrates that information on the companies' websites
13 during an emergency event is used by numerous interests during an emergency event, and
14 underscores that including accurate outage and restoration progress information on the
15 companies' websites during an emergency event is important for both customer planning
16 and system planning.

17
18 UI has recognized the need to improve and update its storm outage webpage as a result of
19 its experience during previous outage events. In response to interrogatory AG-11, it
20 provided a list of lessons learned from a March 2010 outage, including this one, "UI
21 storm page needs both a technological upgrade and improved content around on-going
22 storm response information such as geographic depictions of outage areas. The UI

1 website should include updated features such as an interactive outage maps (sic) and
2 links to other information.” See also UI’s similar response to EL-10.

3
4 CL&P also saw the need for website improvements as a result of lessons learned from
5 previous outage events. In response to Interrogatory AG-038, it provided a document
6 entitled, *Lessons Learned from the 2011 Storms, December 7, 2011*. This document
7 memorializes the results of meetings between CL&P and the Connecticut Conference of
8 Municipalities and the Council of Small Towns. Among the recommendations is one
9 dealing with the CL&P outage map, “Evaluate changes to outage map to be more
10 representative of restoration process and real-time activities”.

11
12 **Q. PLEASE COMPARE THE STORM INFORMATION ON THE EDCS’**
13 **WEBSITES WITH THOSE OF BEST PRACTICE UTILITIES.**

14 A. Best practice utilities provide comprehensive information on their websites to help
15 customers during a major outage. Most notable is their use of outage maps that provide
16 detailed customer information. For example, on the National Grid website a customer
17 can report an outage in three different ways: using a phone number, an account number,
18 or the last four digits of the customer’s social security number. In contrast, CL&P
19 requires that customers provide account numbers to report outages. This information is
20 not easily accessible to all customers during an outage due to customer relocation from
21 their home or as a result of online billing. On the National Grid website the customer can
22 take a mini tutorial on how to use the website’s outage management system; this system

1 allows the customer to mouse over a map and select the region of interest. Color coded
2 light bulbs indicate the number of customer outages from a macro view. Customers can
3 also get information useful to them by entering a specific address. The map allows the
4 user to see the number of outages within one mile of that address. Customers can also
5 check on the status of previously reported service issues. This granularity of data
6 presented is much more useful for customers trying to plan than the 99% restoration
7 estimates that CL&P used, which offer no specific detail.

8
9 Best practice websites also provide information to customers in a variety of formats. For
10 example, on the website for Con Edison, outage information is available in a website area
11 known as Storm Central, which can be accessed from the website homepage. At this
12 location a customer can report an outage, view a state-of-the-art outage map (similar to
13 that described above), review a prepared list of frequently asked questions and answers,
14 watch video tutorials about electrical outages, click on links to sites of interest during a
15 storm (emergency service providers and weather sites), or review on-line brochures
16 covering topics such as *Power Problems? Let Us Know*, *Electric Safety*, and *Safety for*
17 *Special Customers*.

18
19 **Q. DO YOU HAVE ANY RECOMMENDATIONS FOR IMPROVING THE EDCS’**
20 **OUTAGE INFORMATION WEBSITES?**

1 A. Yes. We have the following recommendations for Connecticut utilities' storm
2 information websites. The first two recommendations apply to all types of utilities; the
3 third is directed at EDCs.

4 • Utilities should ensure that their websites have the capacity to be accessed by all of
5 their customers during a storm without interruption.

6 • Utilities should allow customers to report outages on websites (and by telephone)
7 using a variety of alternative input methods, including phone numbers, account
8 numbers, or the last four digits of a customer's social security number.

9 • EDC's websites should provide outage maps with detailed outage information by
10 town and neighborhood. Customers should be able to check on the status of
11 previously reported service issues. Websites should also provide other useful outage
12 information related to customers' health and safety.

13

14 **Q. WHAT NON-TRADITIONAL METHODS DID THE EDCS USE TO**
15 **COMMUNICATE WITH CUSTOMERS AND HOW EFFECTIVE WERE THEY?**

16 A. In responses to interrogatories, the companies have described their use of a number of
17 new communications media, such as Twitter, Facebook, Flickr, and YouTube to inform
18 customers about outages in 2011. We have reviewed the companies' postings and
19 describe their use below.

20 Twitter and Facebook – Both CL&P and UI used Twitter and Facebook to communicate
21 with customers. These served as a useful vehicle to remind customers of safety messages
22 (e.g. "For those of you using a generator, please remember to never use it indoors and

1 don't overload it with too many appliances"), let customers know when new information
2 would be available through other media outlets (e.g. "Happening Now: News 8 live at
3 5:30pm in our Emergency Operations Center in Berlin @WTNHygrog.com/h2tbkadj"),
4 and to alert customers to updated restoration estimates (e.g. "Restoration estimates are
5 now available for 50 towns in Eastern and SW CT at
6 www.clp.com/stormcenter/estimates/"). Both companies provided similar information on
7 Twitter and Facebook.

8
9 CL&P responded to some individual customer inquiries (e.g. "[customer name deleted
10 here for privacy reasons] we are working on completing assessments so we can provide
11 more specific restoration estimates. Thanks for your patience.") on Facebook and Twitter.
12 CL&P also noted that it had some problems with profanity in the responses it received on
13 Facebook that had to be edited out.

14
15 In response to Interrogatory CSU-37, UI said that it "does not rely on social media
16 channels to acquire information from customers. The Company specifically only relied
17 on these channels to disseminate information. The information posted on UI's social
18 media channels is the same information utilized in press releases and website posted
19 information... These messages serve as an additional and supplemental portal for
20 information."

21 Flickr and YouTube – CL&P used Flickr to post pictures of damage from the storm and
22 of crews at work. Similarly, its YouTube postings primarily dealt with showing

1 damage to its infrastructure and crews working on repairs. It also had postings that
2 interviewed crews from other states and provinces; the Mayor of New Britain talked
3 about the devastation in the area and how it helped to have a town liaison. CL&P did
4 not use YouTube to communicate with its customers about planning to deal with the
5 outages or to give them information about restoration. UI did attempt to provide
6 information of this type. For example, on August 31, 2011 it posted a three minute video
7 clip entitled “12 PM UIL CEO Jim Torgersen Update”, in which UI’s CEO talked about
8 the company’s outage goals, provided a customer service phone number, and
9 explained the company’s restoration expectations for that date.

10 Cell Phone Notification of Outages – CL&P provided customers a cell phone method for
11 reporting an outage and obtaining restoration information. The customer received the
12 same information as on the website with the exception that the customer’s town could
13 add a message specific to its zip codes if it chose.

14
15 **Q. WHAT IS YOUR ASSESSMENT OF THE EDCS’ USE OF NEW MEDIA TO**
16 **COMMUNICATE WITH THEIR CUSTOMERS DURING PROLONGED**
17 **OUTAGES?**

18 A. If media information does not meet customers’ needs it is unlikely that they will continue
19 to seek out that type of information. Without a focused message, new media has the
20 possibility of becoming a distraction rather than a help. Our assessment is that while the
21 EDCs’ Twitter and Facebook messages could be useful to customers, those on
22 YouTube were less helpful. We believe that UI’s stated approach to Twitter and

1 Facebook, using them as a way to disseminate information rather than responding to
2 individual customers, is the most effective way to use these social media outlets.

3
4 **Q. WHAT ARE UTILITY BEST PRACTICES FOR USE OF SOCIAL MEDIA TO**
5 **COMMUNICATE WITH CUSTOMERS DURING MAJOR OUTAGES?**

6 A. Utilities' use of social media to report on storm outages is still in its infancy and there is
7 plenty of room for improvement within the industry. Our review of utility web sites
8 seems to indicate that utilities so far have used Twitter and Facebook to respond to
9 questions from customers, to provide safety reminders, and to give status updates.

10 YouTube video clips generally focus on showing storm damage and pictures of crews at
11 work. However, there have been some attempts to go further in use of new media. Here
12 are a few recent developments that are worth noting as utilities prepare for future storms:

- 13 • Con Edison's website contains four short professionally produced videos on power
14 outages that can help customers better understand what is happening when electricity
15 is unavailable. This type of information can be prepared before storms hit so that
16 there is time to do a thoughtful job.
- 17 • National Grid used YouTube during Storm Irene to give customers the best
18 information available at the time in the video "National Grid Addresses Response to
19 Tropical Storm Irene". In this video the company's CEO provided an update and
20 spoke about customer safety.
- 21 • During recent outages (January 2012), Puget Sound Energy used Tumblr, a hosting
22 platform for a wide variety of electronic media to communicate with its customers.

1 **Q. DO YOU HAVE ANY RECOMMENDATIONS FOR IMPROVING THE**
2 **EDCS' USE OF SOCIAL MEDIA DURING MAJOR OUTAGES?**

3 A. Yes. We have the following recommendations for the EDCs' storm information
4 websites.

- 5 • Social media should be used to meet customers' need for information so that they can
6 remain safe and be able to plan how to cope with prolonged outages.
- 7 • YouTube clips should provide information about what customers should do to
8 remain safe, or where to go for shelter, in addition to providing video of storm
9 damage restoration efforts. Some of this type of general safety information should
10 be prepared before storms hit so that there is time to do a thoughtful job.
- 11 • Twitter and Facebook should be used as a means of disseminating information rather
12 than responding to individual customers.

13

14 **Q. WHAT IS YOUR OVERALL FINDING ABOUT ELECTRIC UTILITIES'**
15 **OUTREACH TO LIFE SUPPORT CUSTOMERS?**

16 A. Both EDCs have a program for keeping track of customers that require electric
17 apparatus to sustain life (life support customers) as well as critical care customers and
18 have a process for contacting these customers when a major electric outage event is
19 anticipated. Our concern is that the current procedures do not go as far to ensure the
20 safety of these customers as the procedures used by best practices utilities.

21

1 **Q. PLEASE DESCRIBE THE EDCS' LIFE SUPPORT PROGRAM.**

2

3 A. Both EDCs maintain a list of life support customers who voluntarily provide
4 information about their medical condition; the utilities use that list for an outbound
5 telephone call to say that a storm is coming and that it is up to the life support customer
6 to make appropriate arrangements. During Storm Irene and the October Nor'easter,
7 CL&P contacted life support customers with a pre-recorded telephone message
8 suggesting that they contact the Red Cross if they needed assistance. UI made a similar
9 appeal during Storm Irene.

10

11 Materials prepared by the utilities say that the EDCs will contact life support
12 customers by telephone, but beyond that point the emphasis is on the life support
13 customer taking responsibility for their well-being in the aftermath of a major storm. For
14 example, UI's response to Interrogatory AG-8 includes a power point presentation given
15 to municipalities that says, "Customers on Life Support are instructed by UI at the time
16 they notify the Call Center of their status that they are to make other arrangements in case
17 of a power outage."

18

19 **Q. HOW DID THE EDCS REACH OUT TO LIFE SUPPORT CUSTOMERS**
20 **DURING STORM IRENE AND THE OCTOBER NOR'EASTER?**

21 According to its response to Interrogatory OCC-206, CL&P has approximately 20,000
22 customers coded as either life support or medically certified as having a life threatening
23 illness. The response further states that it does not share these lists with municipalities
24 because of privacy concerns associated with distribution of medical information.

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CL&P teamed up with the Red Cross to reach life support customers during both Storm Irene and the October Nor'easter. During the October Nor'easter, CL&P gave the Red Cross a list of life support customers that wanted to receive help. The response to OCC-204 says that CL&P's life support list does not contain a secondary customer phone number.

Interrogatory responses from CL&P show that hundreds of life support customers were without power for more than five days during the October Nor'easter; some life support customers lost power for up to 11 days. Remember, these are customers that rely on electricity to power equipment that they need to sustain life. Clearly, being without power for such a long time was a serious situation for these customers.

UI's response to Interrogatory OCC-138 says that there are currently 6,500 life support customers in its system. During Storm Irene it sent an outbound telephone message to approximately 4,499 customers coded as using medical or life support equipment. It suggested that these customers contact the American Red Cross if they needed assistance, but did not provide a telephone number. Between August 31 and September 3, UI sent an additional outbound message to approximately 3,200 customers coded as "medical" in a joint effort with some of its towns.

During interviews, UI told us that during Storm Irene the company provided lists of life support customers to the towns it serves, if they requested them, so that the towns could

1 contact these customers if they wished. UI did not do this during the October Nor'easter
2 because none of their life support customers were without power for more than two days;
3 for this reason, UI also did not make an outbound call to life support customers during
4 the October Nor'easter.

5
6 UI says that it does not assign a consistent priority to life support customers. "However,
7 in the event a customer with a life threatening condition is without power and initiates an
8 escalated call to UI, special consideration for a restoration priority will be given" (see
9 response to Interrogatory OCC-138). In response to Interrogatory OCC-201, UI said,
10 "UI responded to the towns' request to provide them with lists containing the
11 locations of customers that are coded life support so that the towns could reach out to
12 these customers to offer support." UI also said that "Life support customers are
13 prioritized first on all single service outages."

14
15 CL&P, in response to Interrogatory OCC-201, says that it restores customers, including
16 life support customers, in accordance with its Emergency Plan filed on June 1, 2011.
17 This document does not appear to give any special consideration to life support
18 customers.

19
20 **Q. HOW DID STORM IRENE AND THE OCTOBER NOR'EASTER AFFECT**
21 **VULNERABLE CUSTOMERS?**

1 A. Comments and letters received from customers frequently spoke of fears and frustration
2 of those caring for vulnerable members of their family or community. Here are a few
3 examples of the type of concerns raised by customers:

4
5 “I want to put a face and a family on the hardships imposed by the recent storm
6 that decimated my area of Connecticut. My husband is disabled and is mostly
7 confined to bed. He is 89 years old and I am 84. Both of us are retired teachers
8 and living on a fixed income. We lost our electrical power early on Sunday
9 morning and also had no telephone and no water. Because of my husband’s
10 precarious health I had to place him in a nursing home in our area so that he
11 would be warm, fed and changed when necessary. To do this I had to hire an
12 ambulance to take him to the Home. All of these were expensive. My husband’s
13 room cost over four hundred dollars a day plus six hundred dollars for the
14 ambulance. These are monetary expenses [sic] not covered by Medicare or my
15 insurance. This does not take into account all the worry and hardships that fell on
16 me.”

17
18 “...I am outraged by the length of time our power was out during these last two
19 storms. During Irene we were out for 8 days and this one for 7. This is
20 unacceptable. I am also more upset being a cancer patient who had on both
21 occasions just completed a 16 day chemo protocol and to have to try to recoup
22 with no facilities and to have to exert extra energy to keep heat, toilets etc in

1 order in a weakened state as a result of chemo treatment just made me even more
2 upset that we could not count on CLP to respond in a more responsive way.”

3
4 “As we discussed today, we had to move my mother in law, who is a frail 87 year
5 old woman who suffers from Parkinson’s, COPD, arthritis and a host of other
6 problems due to her age. We were lucky to find a nursing home in Danbury,
7 Hancock Hall, but were told that this would be an out of pocket payment...\$395
8 per day plus any other items that Medicare would not cover for the week she
9 was there. I have tried calling CL&P reps and supervisors and written to their
10 complaint dept only to be rejected each time.”

11
12 “My mother has multiple sclerosis...The bed that my mother and father share is
13 an adjustable bed that allows them to raise the head and foot of the bed as needed
14 to provide more comfort for my mother and to provide better positioning for my
15 father to be able to be fed and allows him to have his upper body raised into a
16 semi-seated position. Although the town had set up full service shelters those
17 shelters were not equipped to handle the special needs of my mother and father,
18 there was nowhere for them to go. There was nowhere that could accommodate
19 them as far as the specialized, medically necessary mattress required for my
20 father. We were left with no heat, no way to re-charge my mother’s electric
21 wheel chair, and no way to raise the head or feet of my mother and father’s bed.”

1 These are just a few examples of many letters of this type from customers finding
2 themselves in difficult situations resulting from power outages.

3
4 **Q. WHAT IS YOUR ASSESSMENT OF THE EDCS' PRACTICES**
5 **INVOLVING LIFE SUPPORT AND OTHER VULNERABLE CUSTOMERS?**

6 A. To be sure, the EDCs cannot be expected to meet the medical needs of their medically
7 fragile customers during an outage. However, there are improvements that could be
8 made to the EDCs current practices. OCC notes that the primary means of contacting life
9 support customers is by telephone. Many people's telephone land lines were down
10 during the storms and cell phone batteries only last so long. The EDCs should therefore
11 take steps to allow information to be shared with towns, emergency personnel and state
12 agencies so that medically fragile people can get the help they may need during an outage
13 if no telephone contact can be made.

14
15 During the storms, throughout Connecticut, towns set up shelters, many of which had
16 only a small number of people showing up. *The Report of the Two Storm Panel:*
17 *Presented to Governor Dannel P. Malloy* has called for better planning to meet the needs
18 of vulnerable citizens, including better use of shelters. We believe that this is an
19 important step and support further planning to meet the needs of life support, critical care,
20 and other vulnerable customers with special needs.

21
22 **Q. WHAT DO BEST PRACTICE UTILITIES DO TO COMMUNICATE WITH LIFE**
23 **SUPPORT CUSTOMERS?**

1 A. Industry best practice utilities make sure that information about life support and critical
2 care customers is kept up-to-date, with updates made at least annually; during a
3 prolonged outage the utility works with localities to ensure that these customers are safe.
4 In addition to the initial call notifying life support customers that outages are a
5 possibility, best practice utilities individually contact life support customers to make sure
6 that they have made appropriate arrangements, often with repeated contacts until power is
7 restored. If the life support customer is in a residence that is without power and without
8 backup generation, the utility follows up periodically until power is restored to ensure the
9 customer's safety. Names and contact information about life support customers who
10 cannot be reached or who need assistance are turned over to local officials (based on
11 customer consent as part of the process of being on the life support list) so that they can
12 ensure the safety of the life support customer. The Red Cross, local fire or police
13 departments, or other local services can be enlisted to make sure that the life support
14 customer is safe.

15
16 **Q. WHAT RECOMMENDATIONS DO YOU HAVE TO IMPROVE THE**
17 **EDCS' OUTREACH TO LIFE SUPPORT AND OTHER VULNERABLE**
18 **CUSTOMERS DURING MAJOR ELECTRIC OUTAGES?**

19 A. We recommend that the EDCs' procedures for outreach to life support/critical care
20 customers should be modified to include the following provisions:

- 21
22 • Customers should be asked to provide a secondary contact phone number and email
23 address, if available, when signing up to be on the EDCs' life-support lists. This

1 information should be updated annually, at a minimum. This will improve the odds
2 of being able to assist these customers during a major outage event. This information
3 could be invaluable to those trying to make contact with the customer during
4 circumstances when many normal forms of communication are unavailable.

- 5 • During a prolonged electrical outage, life support customers who are known to be
6 without power should be contacted individually by the utility, using each point of
7 contact provided by the customer, if necessary, to ensure that the customer is safe.
- 8 • The EDCs' certification process to be part of their Life Support Customer program
9 should offer the customer the option to waive their American Health Insurance
10 Portability and Accountability Act of 1996 (HIPAA) privacy rights so that their
11 contact information can be shared with their town, with the Red Cross, with relevant
12 state agencies, and with first responders during prolonged electrical outages. Life
13 support customers should be made aware that if they do not give permission to share
14 this information, and the EDCs are unable to contact them during a major outage, no
15 one can be notified to check on them, even the local officials in the towns where they
16 reside.
- 17 • For customers who have agreed to waive their HIPAA rights, contact information
18 about these individuals should be turned over the person's town EOC for monitoring
19 and any necessary follow-up action. Unless the information has been turned over to
20 organizations that can provide additional assistance or the utility has been informed
21 that the customer has moved out of the residence during the power outage, this
22 process of contacting the life support customer should continue every second day
23 until the customer's power is restored.

- The EDCs should explore use of public service announcements geared to the needs of life-support customers provided through media other than just phone contacts. The EDCs should coordinate with the towns on this effort.
- Connecticut should study additional ways for state agencies and/or municipalities to improve services to vulnerable customers during major outages.

COMMUNICATION WITH STATE AND MUNICIPAL OFFICIALS

Q. PLEASE DESCRIBE HOW THE EDCS COMMUNICATE WITH MUNICIPALITIES DURING MAJOR OUTAGES.

A. For more than a decade, UI has used municipal liaisons to communicate with municipalities in its service territory during major electrical outages. At least one company employee is assigned to each of the 17 towns in UI's service territories.

The Jacobs Reports, issued in October 2010 for both UI and CL&P, built on this concept, recommending more proactive communication between municipalities and electric utilities using the mechanism of liaisons, known as municipal liaisons by UI and town liaisons by CL&P (see pages 57 and 58 of the UI report and pages 64 and 65 of the CL&P report).

According to UI managers we interviewed, UI's municipal liaison process has become more formalized in recent years. When there is a new Selectman in its territory, soon after the election, UI meets with the Selectman to inform him/her about the municipal

1 liaison process. According to the UI representatives, this process went quite smoothly for
2 both outage events, perhaps because this concept had been in place for a long time with
3 opportunities to improve over time based on experience.

4
5 CL&P employed the town liaison concept many years ago. It reintroduced the use of
6 town liaisons in September 2010 for Hurricane Earl. During our January 18 meeting with
7 Senior Executives we learned that CL&P also deployed two liaisons in June 2011. The
8 first major deployment of town liaisons came during Storm Irene (see response to
9 Interrogatory EL-9). In many cases these liaisons met the town officials in the area
10 where they were assigned for the first time (see response to Interrogatory CSU-27) and
11 some received training only days before Hurricane Irene made landfall (see response to
12 Interrogatory AG-8) . During interviews with towns we heard of instances where liaisons
13 were placed in difficult situations by their lack of training and support from CL&P.
14 Furthermore, some of the liaisons that CL&P deployed during the October Nor'easter
15 were different than those used during Irene. One of CL&P's lessons learned is that
16 liaisons should be pre-assigned to towns because having a pre-established relationship
17 with the town management and infrastructure is important (see response to Interrogatory
18 AG-36, page 13). In addition, there should be at least one back-up liaison assigned to
19 each town, which allows for consistency and efficient coordination of communication
20 efforts.

1 During Storm Irene Legislative Hearings, held in September 2011, House Speaker
2 Christopher Donovan highlighted the importance of better communications with
3 municipalities during restoration events. However, during the October Nor'easter
4 problems involving communication with municipalities persisted. As a report prepared
5 by Witt Associates, entitled *Connecticut October 2011 Snowstorm Restoration Report*
6 pointed out on page 23, "CL&P has significant public communications capabilities
7 and staff. However, in the snowstorm outage, town liaison and corporate
8 communications functions were not aligned in the organizational structure, and public
9 messages and communications activities demonstrated a focus on unity or consistency of
10 message rather than message accuracy."

11
12 The concept of having dedicated town/municipal Liaisons to be a point of contact during
13 prolonged outages is an appealing approach. Ideally, it could provide a single point of
14 contact for communication, and offer a conduit for information to be sent to a town and
15 for issues from the town to be transmitted to the utility. In practice, however, this
16 concept did not always work as intended, as described in the examples that follow.

17
18 A letter filed by Patrick Alair, Deputy Corporation Counsel for the Town of West
19 Hartford, on December 15, 2011 (page 2) describes a lack of responsiveness by CL&P to
20 the needs of the Town. As Alair explained it, "During Nor'easter Albert, West Hartford
21 emergency officials repeatedly found that they obtained better and more accurate
22 information about the areas of the Town still affected by outages by having police

1 cruisers patrol the streets at night noting the dark areas rather than relying upon reports
2 received from CL&P. Areas or buildings which Town officials identified as restoration
3 priorities went unrepaired for days without explanation. Non-local crews were observed
4 in Town simply waiting for directions or for someone from CL&P to give them authority
5 to proceed on work. The status and number of CL&P and non-local crews in Town was
6 determined much more accurately by sending a police officer to the CL&P staging area at
7 Westfarms Mall to interview staff there than by listening to the reports from the liaison
8 personnel officially assigned to the Town by CL&P. Sadly, after several days, CL&P
9 personnel at the Westfarms Mall staging area were reportedly instructed not to talk to
10 West Hartford police officers any further. Certainly any idea which might improve
11 communications and the coordination of restoration efforts is worthy of careful
12 consideration.”

13
14 During interviews with officials in towns throughout Connecticut, OCC and TCG
15 representatives repeatedly heard examples of communication problems between the
16 towns and the EDCs. As a result, we decided to work with the Office of Consumer
17 Counsel to conduct a survey of town officials to better understand this situation.

18
19 **Q. PLEASE DESCRIBE THE RESULTS OF THE SURVEY YOU CONDUCTED OF**
20 **MUNICIPAL OFFICIALS’ OPINIONS ABOUT ELECTRIC UTILITY**
21 **COMMUNICATIONS WITH THEM DURING STORM IRENE AND THE**
22 **OCTOBER NOR’EASTER RESTORATION EFFORTS.**

1 A. In January 2012, the Connecticut Office of Consumer Counsel issued a survey to all
2 towns served by UI and CL&P. This survey went to town executives, mayors, first
3 selectman, town managers, emergency directors and first responders. Sixty-eight
4 municipalities in Connecticut submitted survey responses, representing over 50% of the
5 populations served by UI and CL&P. The areas covered in the survey included:

- 6 • value of information provided to towns by the utilities during the storm
7 restoration
- 8 • usefulness of utility town/municipal liaison approach to communication
- 9 • effectiveness of coordination with the utilities

10 The quantitative survey results with summary charts, by subject area, are shown in
11 Exhibit __ (TCG-1-4), Municipal Survey Results Presentation, which is referenced
12 below. In addition, respondents had an opportunity to offer written responses to further
13 explain their concerns, issues, and suggested opportunities for improvement. A detailed
14 summary of the survey written comments, by survey question, is available as Exhibit __
15 (TCG-1-5), Municipal Survey – Written Comments.

16
17 Respondents state that the value of the information provided by the liaison was
18 considered helpful by respondents in CL&P territory for both Storm Irene (57%) and the
19 October Nor'easter (68%) and in UI territory (55% for Storm Irene and 86% for the
20 October Nor'easter). However, this overwhelming approval percentage does not agree
21 with the written comments provided by the same municipal respondents. In the
22 comments, many respondents acknowledged that their liaison tried to be helpful, but

1 mentioned a lack of accurate and timely, specific restoration information and authority
2 that the liaison was able to provide.

3
4 With regard to the municipal survey question about the effectiveness of liaison
5 communication, many towns considered the liaison's performance effective; in CL&P
6 territory for Storm Irene and October Nor'easter these percentages were 66% and 77%,
7 respectively, and in UI territory, they were 55% and 88%, respectively. Again, the
8 written survey comments did not agree with the quantitative results in the rating scale
9 system. Specifically, in the written comments, the towns made the following points:

- 10 • the liaisons lack any operational authority or control to impact restorations
- 11 • utility management did not use the information the town provided to the liaison
- 12 • most town comments focused on lack of feedback on the status of restoration
13 completions

14 In terms of the effectiveness of utility coordination with the town's restoration priorities,
15 the quantitative rating scale shows that over half of the towns believed that both CL&P
16 and UI were responsive to town restoration priorities. However, many towns were not
17 satisfied with the electric utilities' communication with them. Their written comments
18 state that the utilities' level of communication with the town and the utilities'
19 coordination with town restoration priorities was not acceptable. Towns often mentioned
20 that the problem during the restorations was not with the liaisons themselves, but with
21 the utility's non-response to information the town had provided it through its liaisons or
22 otherwise. When asked about the effectiveness of the utility's coordination with the

1 town department of public works, just over 50% of respondents for CL&P and UI
2 believed that the utility was at least somewhat effective in assisting it; over 35% of
3 respondents thought the utilities were not helpful with such tasks as clearing roads and
4 coordinating restoration work.

5
6 The survey also asked town officials if they had contact with utility employees other than
7 the town/municipal liaison assigned to them. The percentage of respondents that stated
8 that they contacted other utility employees to get additional restoration information for
9 Storm Irene and the October Nor'easter are 55% and 73% for CL&P, respectively, and
10 88% and 71% for UI, respectively. These high percentages strongly indicate that the
11 municipalities were not satisfied or comfortable with the quality and timeliness of
12 information provided to them by the utilities through their liaisons and felt the need to
13 get information through other means.

14
15 The survey also queried town officials about the consistency of town and electric utility
16 restoration priorities. According to the respondents, UI addressed town priorities
17 effectively for Storm Irene (67%) and the October Nor'easter (88%), showing a large
18 improvement between the two storms. For CL&P, the percentage of towns that believed
19 that the utility effectively addressed the town priorities was 59% for Storm Irene and
20 55% for the October Nor'easter. However, 41% and 45%, respectively, did not agree
21 that restoration priorities were addressed effectively, which is a significant percentage
22 and indicates an opportunity for improvement. The primary focus of the comments

1 associated with this question was that the utilities consistently ignored established
2 priority lists and daily status reports. Several towns did acknowledge that the
3 restoration problems could have been due to the severity of the October Nor'easter.

4
5 **Q. PLEASE DISCRIBE SOME OF THE AREAS OF TENSION BETWEEN THE**
6 **TOWNS AND THE UTILITIES REGARDING RESTORATION PROIRITIES.**

7 A. Based on the results of our municipal survey and meetings with individual towns, we have
8 identified some of the tensions between the EDCs and the towns regarding
9 restoration priorities. In general EDCs' storm restoration efforts are geared
10 primarily to restoring the largest number of customers as quickly as possible with
11 deference to 911 priority calls and some town pre-designated critical infrastructure
12 priorities. The towns, for the most part, are concerned about public access to roadways
13 for first responders such as police, fire, and medical personnel immediately after the
14 storm hits. In addition, the towns are concerned about electric service to their
15 emergency operations centers and public shelters. As the length of the outage extends,
16 towns are often faced with making serious decisions about relocating patients of health
17 care facilities and customers on life saving equipment that are in locations lacking power
18 to alternate locations until power to their health facility or home can be restored.

19
20 In both Storm Irene and the October Nor'easter, many towns tried to communicate their
21 restoration priorities through their town/municipal liaisons with varying levels of success.

22 It also appears that the electric utilities were faced with some situations where the

1 restoration priorities for individual towns were being communicated to the EDCs from
2 multiple, uncoordinated sources within towns, such as from different town officials and
3 police 911 dispatchers.

4
5 Furthermore the results from the survey and the individual town meetings reinforce the
6 observations made by Witt Associates (at page 26) that for CL&P the information
7 flowing into its incident command structure from the town liaisons was not being
8 effectively integrated into restoration work assignments. It appears the some of these
9 communications from the towns to the electric utilities were going through the town
10 liaisons and some were not. With the October Nor'easter storm response, as time went
11 on towns increasingly by-passed the town liaisons communication structure to try and to
12 both give and receive critical information, especially in cases where no meaningful
13 feedback was being received back through their liaison.

14
15 In addition, some towns tried to expedite the damage assessment process by
16 communicating their observations about such things as downed power lines and blocked
17 roads involving live electric wires. Some of these towns did not perceive that the utilities
18 were using the information they provided in a meaningful way, which added to the
19 towns' sense of frustration.

20

1 In interviews with CL&P and UI incident command personnel there was also some
2 concern expressed that when crews were assigned to address individual town priorities, it
3 was not always a productive use of the available resources and delayed overall
4 completion of the storm restoration efforts.

5
6 A significant conclusion of our review in this area is that unless a more disciplined
7 approach to communication and issue resolution regarding restoration priorities between
8 the utilities and the towns can be achieved, communication flow will continue to be a
9 problem and the level of public concern regarding this issue is likely to remain high.
10 This issue is particularly acute with regard to make-safe and roadway clearing operations
11 to enable access by first responders immediately following a storm.

12
13 **Q. HAVE YOU IDENTIFIED ANY IMPROVEMENT OPPORTUNITIES FOR**
14 **ELECTRIC RESTORATION COMMUNICATION EFFORTS?**

15 **A.** Yes. Town/municipal liaisons need to be better informed about the towns they represent
16 with respect to critical infrastructure and locations and the layout and operation of the
17 electric grid. Accurate maps of neighborhoods and electric grid circuits are essential to
18 improve field work efficiency. Better emergency planning, including planning
19 specifically for communication with municipalities affected by the outage is needed. The
20 goal should be to distribute timely, accurate information to all parties. Lessons learned
21 documents prepared by CL&P speak of the need for improved town/municipal training
22 (see response to AG-36). It is important that CL&P follow up on this lesson learned.

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Using a liaison for each town is a logistically complex undertaking. This is especially true for CL&P, with nearly 150 towns represented. Therefore, it might be more manageable to coordinate these liaison communications on a regional (or divisional basis). The EDCs should continue to refine their communication efforts, with emphasis on the utilities making better use of the information provided by the town/municipal liaisons and providing information to liaisons that will be of most use to their assigned town. Town officials may also need to improve their use of a single point of contact for communicating priorities to avoid sending conflicting messages about priorities. This can take time to sort out and is especially a problem when response resources are limited. The town EOCs should also be aware of the 911 (from their locality) that have been escalated to the EDCs for priority handling. Improved communication protocols to add discipline to the two-way communication processes should be established and included in each of the EDC’s Emergency Plans.

Q. DO YOU HAVE ANY SPECIFIC RECOMMENDATIONS ON HOW CONNECTICUT ELECTRIC UTILITIES COULD IMPROVE COMMUNICATION WITH TOWNS?

A. Yes. Best practice utilities have greatly improved their communication with municipalities in their territories in recent years. Both CL&P and UI could benefit from implementation of the following recommendations to improve communication and effectiveness of restoration efforts:

- 1 • Hold periodic joint training sessions and drills with utility personnel and municipal
2 emergency management officials to address: clarifying emergency preparedness
3 procedures and priorities, understanding the operation of critical town infrastructure,
4 identifying town restoration priorities, consolidating electric distribution grid and
5 town street maps, coordinating post-storm damage assessment (e.g. downed wires,
6 closed roads), and coordinating make safe operations with utility and town work
7 crews.
- 8 • Liaisons should participate in periodic emergency management planning exercises,
9 training and drills along with municipal officials.
- 10 • Liaison should understand thoroughly the utility infrastructure in their assigned town
11 and its location within the town.
- 12 • Liaisons should develop working relationships with utility operations personnel.
- 13 • Liaisons should have National Incident Management System (NIMS) protocol
14 training.
- 15 • The towns served by CL&P and UI and these utilities need to work together to
16 develop protocols for communication and resolution of emergency restoration
17 priorities, preferably on a more manageable division or regional basis. The protocols
18 should include the use of the assigned town liaisons to identify, and be kept informed
19 on, all priority restoration requests outstanding in a town, including 911 calls. The
20 protocols should identify clearly what circumstances would actually require a
21 diversion of critical emergency restoration resources from the overall restoration
22 effort to meet town-specific requirements. Since the survey revealed that the towns
23 often found it necessary to go outside the liaison process, the protocols should include

1 a defined process for escalating disputes between the towns and the EDCs during the
2 emergency event. Having a defined process for the towns to escalate issues within the
3 utilities 'chain of command could potentially reduce the need for other forms of
4 communication. These protocols should become part of the utilities' emergency
5 management plans filed with PURA and should be monitored for compliance.

- 6 • Utilities should institute at least one daily regional/divisional municipal conference
7 call to inform town officials about outages and to coordinate restoration priorities and
8 activities. The call's focus should be on operational matters and should be conducted
9 by a utility representative actively engaged in the restoration incident command
10 organization. PURA staff should be encouraged to monitor these calls.

11
12 **Q. PLEASE DESCRIBE RESULTS FROM THE SURVEY OF MUNICIPAL**
13 **OFFICIALS' OPINIONS ABOUT LANDLINE TELECOMMUNICATION AND**
14 **CABLE COMPANIES' COMMUNICATION DURING STORM IRENE AND**
15 **THE OCTOBER NOR'EASTER RESTORATION.**

- 16 A. The survey described above gathered feedback from the towns regarding the overall
17 communication effectiveness of landline telecommunication companies and cable utilities
18 operating in CL&P and UI territories in Connecticut using a numerical rating system and
19 written comments. Overwhelmingly, town respondents speaking about landline
20 telecommunication companies stated that overall communication was not effective, with
21 a 64% negative rating for the landline company in both CL&P and UI operating
22 territories (AT&T). Almost all towns responding said that they had either nearly non-

1 existent communication or ineffective contact with AT&T during both restoration
2 activities. Interrogatory responses from both AT&T and Verizon state that they
3 maintained adequate and constant communication throughout both Storm Irene and the
4 October Nor'easter (see responses to Interrogatories OCC-243, OCC-243 Supplemental
5 Response (SR), OCC-244, OCC-244SR, OCC-246, OCC-247, OCC-249, OCC-250,
6 OCC-251, OCC-252, OCC-255SR). These responses are in direct conflict with nearly all
7 comments received from towns in the municipal survey conducted by TCG. See Exhibit
8 __ (TCG 1-5), Municipal Survey – Written Comments, which lists all written comments
9 received by survey question area. Town respondents to the municipal survey consistently
10 stated that response times for customer service were long and overall restoration efforts
11 were very slow. Many towns said that landline utilities need to provide emergency
12 contact information and restoration date to towns, emergency operations centers (EOCs),
13 and other utilities in order to coordinate restoration efforts effectively.
14 Telecommunication companies need to coordinate with towns on removal of downed
15 telecommunications infrastructure blocking roadways and inhibiting emergency access.

16
17 For cable companies in CL&P and UI service territories, overall communication efforts
18 were rated either not helpful or neutral for Storm Irene and the October Nor'easter by
19 52% and 59%, respectively, for CL&P town respondents, and 38% and 28%,
20 respectively, for UI town respondents. In addition, many respondents said they had a
21 neutral opinion, an average of 34% of the responses for both storms across Connecticut.

22

1 The municipal survey written comments about cable companies mirror the comments
2 provided about landline telecommunication companies. Few towns thought the cable
3 companies performed effectively (less than 4% for both storms). Towns stated that
4 communication with cable companies was ineffective or virtually nonexistent. The main
5 comments and complaints centered on lack of responsiveness to calls, complaints that
6 cable companies did not participate in town emergency preparedness meetings, and
7 observations that restoration times were not provided to customers.

8
9 **Q. WERE THERE ANY OTHER CABLE COMPANY RESTORATION ISSUES?**

10 A. Yes. In the municipal survey written comments, many towns mentioned their frustration
11 with limited or no communication from the cable companies and a lack of coordination
12 between cable and electric companies, which often delayed restoration. Many towns
13 commented that they had limited contact before and during restoration efforts. Towns
14 spoke of concerns about abandoned lines left hanging on poles, still unrepaired long after
15 restoration activities were supposedly complete. In addition, some towns mentioned that
16 loss of cable service affected their phone service (voice over internet), particularly for
17 critical infrastructure, leaving one town municipal center without service for several days
18 (East Granby). Some towns, in contrast, stated that cable restoration work was not a
19 major priority for them given the overall severity of other problems related to Storm Irene
20 and the October Nor'easter.

1 **Q. DO YOU HAVE ANY RECOMMENDATIONS ABOUT HOW**
2 **COMMUNICATION BETWEEN CONNECTICUT LANDLINE**
3 **TELECOMMUNICATION COMPANIES WITH TOWNS COULD BE**
4 **IMPROVED?**

5 A. Yes. We recommend that landline telecommunication companies in Connecticut adopt
6 the following practice and institute changes to accommodate them as follows:

- 7 • Attendance and participation in emergency planning meetings with towns and
8 electric utilities on a regional basis at a minimum, and preferably on a town basis.
- 9 • Establish mutual restoration protocols between telecommunication companies and
10 towns.
- 11 • Establish more effective protocols for coordinating with towns, including removal of
12 downed telecommunications infrastructure blocking roadways and inhibiting
13 emergency access.
- 14 • Ensure that town emergency management officials have adequate contact
15 information.

16 The procedures listed above should be formalized and become part of the
17 telecommunication companies' emergency plan filed with PURA and be monitored for
18 compliance.

19
20 **Q. DO YOU HAVE ANY RECOMMENCATIONS ABOUT HOW**
21 **COMMUNICATION BETWEEN CONNECTICUT CABLE COMPANIES WITH**
22 **TOWNS COULD BE IMPROVED?**

1 A. Yes. We recommend that cable companies take the following actions to improve their
2 communication with Connecticut utilities and towns:

- 3 • Attend emergency planning meetings between cable companies and the towns.
- 4 • Develop improved communication protocols with local officials for emergency
5 restoration work.
- 6 • Establish restoration criteria for cable service.
- 7 • Coordinate with EDCs on service restoration.
- 8 • Provide up-to-date company contact information to town management and their
9 EOC directors.

10 These procedures should be formalized and become part of the cable companies'
11 emergency plans.

12

13 **Q. PLEASE DESCRIBE RESULTS FROM THE SURVEY OF MUNICIPAL**
14 **OFFICIALS' OPINIONS ABOUT WATER COMPANIES' COMMUNICATION**
15 **DURING STORM IRENE AND THE OCTOBER NOR'EASTER**
16 **RESTORATION.**

17 A. Many water systems in Connecticut are owned and operated by municipalities. In most
18 of these cases the city and town systems had back-up generation, which allowed them to
19 maintain water and sewer service in the aftermath of Storm Irene and the October
20 Nor'easter. However, some towns' water systems are mostly served by wells. In some
21 of these instances during the electrical outages associated with, residents went without

1 water. Several of the comments provided by the towns said that there were some
2 notifications in their jurisdictions about restriction of water usage following the storms.

3
4 **Q. DO YOU HAVE ANY RECOMMENDATIONS ABOUT HOW**
5 **COMMUNICATION BETWEEN CONNECTICUT WATER COMPANIES AND**
6 **THE TOWNS COULD BE IMPROVED?**

7 A. Yes. We recommend that water companies take the following actions to improve their
8 communication with Connecticut utilities and towns:

- 9 • Prepare emergency plans for restoration of water service after outages and undertake
10 coordinated and regional emergency planning
11 • Ensure the availability of generators, where needed, and plan for the possibility of
12 extended power outages
13 • Develop a public notification process for use during widespread outages.

14
15 **Q. PLEASE PROVIDE A SUMMARY OF ALL OF THE RECOMMENDATIONS**
16 **MADE IN THIS TESTIMONY.**

17 A. Below is a summary of the recommendations presented in this testimony.

18 Compensation for Prolonged Outages (see pages 24- 25)

- 19 • If PURA or the state legislature determines that a customer compensation model for
20 prolonged outages is appropriate, OCC believes that eligibility for compensation

1 should be based on being out of service beyond a specified amount of time, and that
2 both food and medicine should be eligible for reimbursement if spoiled.

- 3 • To the extent any such program is paid for by ratepayers, in order to reduce the
4 impact of such a program on rates, OCC believes that a reimbursement program
5 should be primarily directed to limited income (or hardship) customers and the
6 overall amount of the reimbursement should be capped by PURA, on a per storm
7 basis, with reimbursement of up to \$150 for food and \$200 for medications, with a
8 provision for adjustments to account for inflation.
- 9 • If it is found that the restoration time was greater than it should have been, of if the
10 Emergency Plan was not followed, or if other PURA developed criteria were
11 violated, shareholders should absorb all or a portion of the cost of the customer
12 credits.

13 Website Improvements (see pages 27-35)

- 14 • Utilities should ensure that their websites have the capacity to be accessed by all of
15 their customers during a storm without interruption.
- 16 • Utilities should allow customers to report outages on websites (and by telephone)
17 using a variety of alternative input methods, including phone numbers, account
18 numbers, or the last four digits of a customer's social security number.
- 19 • EDC's websites should provide outage maps with detailed outage information by
20 town and neighborhood. Customers should be able to check on the status of
21 previously reported service issues. Websites should also provide other useful outage
22 information related to customers' health and safety.

23

1 Use of Social Media (see pages 35-39)

- 2 • Utilities should use social media to meet customers’ need for information so that they
3 can remain safe and be able to plan how to cope with prolonged outages.
- 4 • EDCs’ use of YouTube should provide information about what customers should do
5 to remain safe or where to go for shelter, in addition to providing video of storm
6 damage restoration efforts. Some of this type of general safety information should
7 be prepared before storms hit so that there is time to do a thoughtful job.
- 8 • Utilities should use Twitter and Facebook as a means of disseminating information
9 rather than responding to individual customers.

10 Life Support Customers (see pages 39-48)

11 We recommend that the EDCs’ procedures for outreach to life support/critical care
12 customers should be modified to include the following provisions:

- 13 • Customers should be asked to provide a secondary contact phone number and email
14 address, if available, when signing up to be on the EDCs’ life-support lists. This
15 information should be updated annually, at a minimum. This will improve the odds
16 of being able to assist these customers during a major outage event. This information
17 could be invaluable to those trying to make contact with the customer during
18 circumstances when many normal forms of communication are unavailable.
- 19 • During a prolonged electrical outage, life support customers who are known to be
20 without power should be contacted individually by the utility, using each point of
21 contact provided by the customer, if necessary, to ensure that the customer is safe.
- 22 • The EDCs’ certification process to be part of their Life Support Customer program
23 should offer the customer the option to waive their American Health Insurance

1 Portability and Accountability Act of 1996 (HIPAA) privacy rights so that their
2 contact information can be shared with their town, with the Red Cross, with relevant
3 state agencies, and with first responders during prolonged electrical outages. Life
4 support customers should be made aware that if they do not give permission to share
5 this information, and the EDCs are unable to contact them during a major outage, no
6 one can be notified to check on them, even the local officials in the towns where they
7 reside.

- 8 • For customers who have agreed to waive their HIPAA rights, contact information
9 about these individuals should be turned over the person's town EOC for monitoring
10 and any necessary follow-up action. Unless the information has been turned over to
11 organizations that can provide additional assistance or the utility has been informed
12 that the customer has moved out of the residence during the power outage, this
13 process of contacting the life support customer should continue every second day
14 until the customer's power is restored.
- 15 • The EDCs should explore use of public service announcements geared to the needs of
16 life-support customers provided through media other than just phone contacts. The
17 EDCs should coordinate with the towns on this effort.
- 18 • Connecticut should study additional ways for state agencies and/or municipalities to
19 improve services to vulnerable customers during major outages.

20
21 Town/municipal Liaisons (see pages 48- 60)

- 22 • EDCs should hold periodic joint training sessions and drills with utility personnel and
23 municipal emergency management officials to address: clarifying emergency

1 preparedness procedures and priorities, understanding the operation of critical town
2 infrastructure, identifying town restoration priorities, consolidating electric
3 distribution grid and town street maps, coordinating post-storm damage assessment
4 (e.g. downed wires, closed roads), and coordinating make safe operations with utility
5 and town work crews.

- 6 • Liaisons should participate in periodic emergency management planning exercises,
7 training and drills along with municipal officials.
- 8 • Liaison should understand thoroughly the utility infrastructure in their assigned town
9 and its location within the town.
- 10 • Liaisons should develop working relationships with utility operations personnel
11 before major outages occur.
- 12 • Liaisons should have National Incident Management System (NIMS) protocol
13 training.
- 14 • The towns served by CL&P and UI and these utilities need to work together to
15 develop protocols for communication and resolution of emergency restoration
16 priorities, preferably on a more manageable division or regional basis. The protocols
17 should include the use of the assigned town liaisons to identify, and be kept informed
18 on, all priority restoration requests outstanding in a town, including 911 calls. The
19 protocols should identify clearly what circumstances would actually require a
20 diversion of critical emergency restoration resources from the overall restoration
21 effort to meet town-specific requirements. Since the survey revealed that the towns
22 often found it necessary to go outside the liaison process, the protocols should include
23 a defined process for escalating disputes between the towns and the EDCs during the

1 emergency event. Having a defined process for the towns to escalate issues within the
2 utilities ‘chain of command could potentially reduce the need for other forms of
3 communication. These protocols should become part of the utilities’ emergency
4 management plans filed with PURA and should be monitored for compliance.

- 5 • Utilities should institute at least one daily regional/divisional municipal conference
6 call to inform town officials about outages and to coordinate restoration priorities and
7 activities. The call’s focus should be on operational matters and should be conducted
8 by a utility representative actively engaged in the restoration incident command
9 organization. Designated town contact people and town/municipal liaisons should
10 participate in these calls. PURA staff should be encouraged to monitor these calls.

11
12 Landline Telecommunication Companies (see pages 60-63)

- 13 • Telecommunication companies should attend and participate in emergency planning
14 meetings with towns and electric utilities on a regional basis
- 15 • Telecommunication companies should establish restoration protocols with the towns
16 they serve.
- 17 • Telecommunication companies should establish more effective protocols for
18 coordinating with towns, including removal of downed telecommunications
19 infrastructure blocking roadways and inhibiting emergency access, especially where
20 no electric wires are involved,
- 21 • Telecommunication companies should ensure that town emergency management
22 officials have adequate contact information.

1 The procedures listed above should be formalized and become part of the
2 telecommunication companies' emergency plans and be monitored for compliance.

3

4 Cable Companies (see pages 60-64)

- 5 • Cable companies should be required to hold emergency planning meetings with the
6 towns they serve.
- 7 • Cable companies should develop improved communication protocols with local
8 officials for emergency restoration work.
- 9 • Cable companies should establish written restoration criteria.
- 10 • Cable companies should coordinate with EDCs on service restoration.
- 11 • Cable companies should provide up-to-date contact information to town management
12 in the towns where they provide service.

13 These procedures should be formalized and become part of the cable companies'
14 emergency plans.

15

16 Water Companies (page 64-65)

- 17 • Water companies should prepare emergency plans for restoration of water service
18 after outages.
- 19 • Water companies should ensure the availability of generators, where needed, and plan
20 for the possibility of extended power outages.

1 • Water companies should develop a public notification process for use during
2 widespread outages.

3

4 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

5 **A. Yes, it does.**