



The Garden Club of New Haven

Promoting the preservation of natural resources is one of the primary missions of The Garden Club of New Haven (GCNH) and of the organizations with which is affiliated, the Federated Garden Club of Connecticut and the Garden Club of America. Since 2011, GCNH has actively participated in educating the public about issues involving trees and power and advocating for a balanced approach to preserving the benefits of trees and protecting public safety, including power reliability.

April 18, 2022

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

Filed electronically

Re: Docket No. 17-12-03RE08
Comments Pertaining to Technical Meetings on March 28 and 29, 2022

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

We have the following comments pertaining to the presentations made by the electric distribution companies at the March 28 and 29, 2022 Technical Meetings.

(1) We request your consideration in this docket of our correspondence in Docket No. 21-05-15, addressing the issue of what would be an appropriate metric to measure resilience. In its written submission to and testimony at the Technical Meetings, Eversource measured its various approaches to achieving greater resiliency in its electric distribution system by impact on "all-in" SAIDI. It is our position that resiliency should be measured by TLR (Total Length of Restoration) or TTR (Total Time of Recovery) with a focus on reduction of the days of power loss due to extreme weather events, such as in Alfred, Irene and Sandy (2011-12) and Isaias (2020), as well as due to more localized extreme weather that resulted in days of power loss for affected customers.

Day to day reliability is important, but loss of power over many days has the most severe impact on the state economy, and the health and safety of its residents. That is clear from the reaction of the public and municipal officials to statewide power losses from these extreme weather events. While we cannot predict when or where they will occur, climate change makes it far more likely that they will occur more frequently and have the potential to be even more extreme. Reliance predominantly on more aggressive tree pruning and tree removal in the almost ten years since the 2011-12 storms did not make the system more resilient in Isaias, not did it eliminate, in that interim period, long outages due to such events as ice storms and tornadoes or microbursts that

were more localized. Such localized outages also cause significant harm to those affected. It is highly unlikely that more aggressive tree pruning and removal,¹ even with stronger poles and wires, will achieve the resilience the state needs in the face of highly probable more frequent and extreme weather. A strategy for incremental development of a maximum underground distribution system for electricity (and communication) in Connecticut is imperative.

(2) With regard to the longevity and maintenance costs of underground distribution, please see [21st-Century Costs of Underground Distribution | T&D World.html](#) (cited in footnote 2 of our March 3 comments in this docket) stating that new undergrounding techniques and materials make underground cables easier to maintain and expected to far outlast overhead lines. That article stated:

The importance of considering grid technologies that lower the frequency of waste-producing maintenance work orders cannot be overstated when comparing complete life-cycle costs. In evaluating public information from utility websites, Federal Energy Regulatory Commission (FERC) Form 1 and U.S. Securities and Exchange Commission (SEC) 10-K filings for five geographically diverse investor-owned utilities — namely, The United Illuminating Co., FPL, Evergy, Arizona Public Service and Portland General Electric — the cost of underground distribution maintenance per mile is 3 times to 7 times lower than overhead. Year after year, utilities are reporting underground maintenance costs are the lowest cost alternative. [Note that this includes older installations.]

We refer you to the websites for [IMCORP](#) (installation, cable life extension, defect identification) and [Sentient Energy](#) (underground line sensors) for more information.

Respectfully submitted,
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¹ More extensive removal of hazardous trees (as defined in Section 16-234(a)(3)), C.G.S.) in the public right-of-way outside of the UPZ, especially on the opposite side of the road, has long been supported by GCNH, and Eversource's response to Interrogatory BETP-015 indicated that a significant majority of non-storm outages were caused by trees outside of the UPZ. UI did not have the data needed to respond. Although a hazardous tree would not necessarily fall in any particular storm, in non-extreme storms it is more likely to fall than a healthy, structurally sound tree.