



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.

December 6, 2022

Marissa 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, Response to Motion No. 043, Requesting Adoption of Undergrounding Report

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

The Garden Club of New Haven (GCNH) supports adoption of an interim undergrounding strategy, including a hybrid category. We have the following comments for your consideration.

Category 1 and Category 2 Projects:

The criteria set forth in Step 1 of the basic structure described in the motion should be deemed criteria to establish *priorities* for the timing of underground projects, since this is intended to be a long term strategy for undergrounding. The first Category 1 projects should be those that rank highest on the criteria. Category 2 projects would expedite undergrounding that would otherwise occur later in the process, but can go forward due to supplementary municipal funding.

The Category 2 projects would increase the resiliency of the entire system by making restoration of above-ground systems faster and reducing overall restoration costs from above-ground systems. To deal with the concern that municipalities have unequal ability to contribute to a Category 2 project, a sliding scale of contribution based on a municipality's financial resources could be used, coupled with consideration of how high its undergrounding project ranked on the criteria.

Clarification of Criteria:

In order to make the assumptions made on page 15 of the undergrounding report explicit, the last criteria in the basic structure, viii, should be clarified to read as follows:

viii. Environmental justice, community needs, medical issues, commercial and industrial consumer needs as discussed in the 17-12-03RE08 decision, including the environmental, health, safety and other benefits of trees saved due to undergrounding,¹ and the impacts on property values when another hardening option is used in place of undergrounding.

Thank you for your consideration of these comments.

Respectfully submitted,
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¹ Specifically with regard to climate change, a robust tree canopy provides mitigation of greenhouse gases due to carbon capture, and is critical to climate adaptation and resilience -- reducing the stress of heat by providing shade, lowering cooling and heating bills by reducing demand, absorbing stormwater and reducing flooding, and improving air quality by removing pollutants. Other benefits include increased property values, increased business income, protection of street pavement, improved mental and physical health, noise reduction, safer communities and traffic calming (reduction in traffic speed).