



## VILLAGE OF SCARSDALE

August 19, 2020

The Honorable Andrea Stewart-Cousins  
Senator, 35th Senate District  
188 State Street Room 907, Legislative Office Building  
Albany, NY 12247

The Honorable Carl E. Heastie  
Assemblymember, Assembly District 83  
LOB 932  
Albany, NY 12248

Dear Senate Majority Leader Stewart-Cousins and Assembly Speaker Heastie,

I am writing to you today on behalf of the Scarsdale Village Board of Trustees and every member of the Scarsdale community, with the stress of having been without electricity for seven days remaining settled deep within my psyche.

As a community leader, I have experienced a high level of frustration in connection with being virtually powerless in helping our residents, local businesses, and other important members of our community to get their electric power restored and return their lives to some semblance of normalcy amidst the continuing COVID-19 pandemic. As a resident having shared their experience, I am angered.

To think that a near suburb of the Nation's largest city – a global center of commerce, technology, and culture – can be without electricity for a full week following a relatively routine storm is a disquieting thought, particularly given the fact that the frequency and severity of storms is anticipated to continue to increase in association with the effects of climate change.

I am incensed by ConEd's failure to develop, manage, and maintain the electric grid in such fashion that our community can count on it for delivery of reliable, cost-effective energy through an efficient and resilient network capable of reasonably-paced recovery following a severe weather event.

Multiple day outages are not reasonable in all but the direst of circumstances.

Five- or seven-day outages are simply beyond the pale; to put it bluntly, they're plainly absurd.

Yet, it seems such outages are becoming the new normal for Westchester County communities.

To that point, with our light fixtures still flickering and our cable/internet services not yet restored – and with the ink barely dried on ConEd's amended response filed in September 2019 with the NYS Public Service Commission reference the 2018 Riley and Quinn extended outages – the media announced last week that ConEd was mandated to pay \$10.75 million dollars for their abysmal performance in responding to the 2018 extended outages.

That bears repeating.

ConEd *just finished* reporting how they would avoid future extended outages and the PSC has within days of this writing ConEd is required to pay \$10.75M for their failure to perform last time . . . and, it's *already* the next time.

The Village Board and our community are angered that the regulatory process failed to generate a course correction.

We are angered that ConEd is not responsive to the needs of the Scarsdale community, Westchester County, or the State of New York.

We are angered that ConEd takes our money and leave us in the dark, figuratively and literally, groping for answers as to when our power will come back on and worried about when the next extended outage will occur. A power outage has very real, tangible impacts rippling well beyond the fact that the lights and air conditioning do not come on when needed. Rate payers are confronted with questions and concerns and are confronted with financial loss and emotional stress.

To illustrate but a few:

Will a power outage interrupt my child's distance learning needs?

To what extent will the power outage impact my business?

How will I complete my work-from-home remote assignments?

How can I protect the at-risk person in my home, or that I am aware of elsewhere?

Each of the foregoing questions suggest a combination of substantial financial and non-financial costs imposed on rate payers – our residents – in connection with extended power outages. These costs are externalized by ConEd to their rate payers and are not included in the financial calculus of determining investment strategies for improving the grid in order to make meaningful progress in minimizing exposure to extended power outages. This needs to change.

ConEd must be prepared and must execute when it is time.

Our electric infrastructure must be hardened, able to resist the impacts of severe weather, and resilient, capable of prompt post-incident recovery.

I am unable to fathom any reasonable explanation for the meteorological *remnants* of Tropical Storm Isaias to knock out power to Scarsdale and other Westchester County communities for seven consecutive days.

When one flips the switch, or hits the power button and nothing happens – for days upon days – there is a real problem involving the entity responsible for operating and maintaining the system.

It is time to solve the problem once and for all. To that end, the following pages provide insights and recommendations to help begin the necessary course correction. Headings are used to highlight key themes.

## **ConEd Operations – Field Supervision and Crew Coordination**

*Problem Statement:* As a result of multiple failures in field supervision and crew coordination, significant productivity losses contributed directly to the multi-day power outage. Both Village personnel and our residents often observed crews standing idle and then leaving, unable to perform the work the crew was dispatched to address. In other instances, crews completed their assigned work quickly, but then sat idle for extended periods of time as they awaited their next task assignment. There were gross inefficiencies attributable to excessive travel times between jobs, failure to supply on-site resources required to complete a particular job, and substantial delays in crews being assigned their next job following task completion. These are fundamental supervisory and field coordination failures that, when amplified on a regional level, contributed heavily – and unnecessarily – to the outage’s duration.

*Recommendation:* ConEd should supply a written description of their EOC structure documenting the presence of adequate span of control at the field operations level, evaluate the underlying cause of these repeated supervisory failures, and advance strategies for closing the significant performance gaps.

ConEd needs to adroitly pivot into its emergency posture, not desperately begin trying to turn the ship.

### *Illustrative Local Experience*

- **Damage Assessment Information Integration – Massive Lost Productivity**

Information from damage assessments, including resource requirements to effectuate a repair, e.g., a new pole, was often not integrated into daily work plan assignments. As a result, crews would arrive on-scene, only to find that a critical resource was not available, resulting in the crew not being able to complete their assigned task. Thus, a crew would not only waste time traveling to and from the location, but they would also sit idle for extended periods of time awaiting dispatch to another assignment. In one example, a crew was dispatched on two consecutive days to the exact same location where a new pole was needed, yet not delivered and available for the repair. On another occasion, *three* different crews arrived on separate days to effectuate a repair, unable to do so each time because the needed transformer was not available on-scene.

It seems that ConEd would benefit from deploying a supply of poles and transformers locally as they work toward restoration. The Village could certainly provide space for such activity during an emergency. If there is a supply on-hand, perhaps travel times would be reduced and failure to coordinate ahead of crew arrival could be mitigated by picking up the needed supply item and heading right back to the job site rather than waiting for a new assignment, leaving Scarsdale, and coming back on another day.

- **Cut and Clear Crews – Late Arrival Times and Absence of Tree Crews**

When made available to us, Cut and Clear crews arrived in Scarsdale to begin their work day after 10:00 AM. Additionally, they tended to leave the community between 8:00 PM and 9:00 PM. Sufficient crews should be in-place to provide for longer work days amidst such emergency conditions. Additionally, crew commute times to and from the places where they are overnighing and the location where they are being dispatched from should be minimized. We

understand that certain crews spent their nights in Manhattan and began their day with a trip to Playland before finally arriving in Scarsdale, resulting in a great deal of lost restoration time.

Additionally, Line Cutting crews often arrived without tree cutting/clearing crews. As a consequence, Village personnel often had to provide services to ConEd that its employees and contractors are supposed to provide. To be clear, we prefer to assign our crews to help rather than have ConEd not proceed with restoration work. However, this significant cost is one that ConEd is obligated to assume responsibility for, but consistently shed to local governments, including Scarsdale. A Cut and Clear crew without half the team – the Clear crew – can't accomplish the task they are charged with resolving. ConEd should be required to reimburse such municipal costs that they externalize through poor planning and execution. Rate payers – our residents – should not have to pay twice for the same service, once through their electric rates and again through their property taxes.

- Excessive Lag in New Assignments – Lost Productivity and Public Perceptions

Village personnel often observed crews awaiting their next assignment to come by radio. To illustrate, our personnel directly observed eight vehicles parked in our Village Hall for two hours after completing a local assignment that only took the first three hours of their work day to complete. Ultimately, we were advised that the trucks were dispatched back to Rye Playland where the crew reported to us they believed they would receive their next assignment. Rather than tackle other known issues in the immediate area where travel time would be minimal, the eight trucks sat idle for two hours and then lost additional time heading back to Rye Playland before being presumably being given their next assignment(s). Not only does this result in a significant decline in productivity, thereby extending the power outage, but it also infuriates the public when they see ConEd crews sitting idle while they remain without power for days.

- Coordination with Verizon and Altice

Where infrastructure failures are identified involving Verizon and/or Altice equipment or cables are identified by ConEd assessment or repair teams, this information should be provided directly to the respective company. As the first company on-scene, it is in the public interest for ConEd to share their observations with the cable and Internet providers, as well as to coordinate repair sequencing where ConEd repairs must be completed prior to Verizon and/or Altice performing their restoration work. Coordination in the wake of substantial storm damage has been made all the more important in the COVID-19 context, whereby much greater emphasis is placed on Internet connectivity for education, business, and shopping.

- Coordination with Local Officials

In virtually all of the examples where our personnel observed ConEd crews sitting idle for extended periods of time, we endeavored to work through our municipal liaison to see if the crews could be redeployed locally to known problem areas. In ConEd's information and personnel management structure, our municipal liaison was unable to influence crew deployment and the crews simply remained idle while awaiting their next assignment. This became such a significant issue that we began assigning one of our own field personnel to directly monitor crew activities in the field and keep track of their efforts, trying to identify nearby issues the crew could help resolve once a particular assignment was complete.

For example, ConEd was not attentive to the need for functioning traffic signals, which constitute a significant public safety hazard when not properly functioning. The Village deployed temporary generators at some controlled intersections and placed temporary stop signs at others. However, it took five days to restore lights at some of our major intersections, including Weaver Street and Griffen Avenue, and Weaver Street and the Hutchinson Parkway on/off ramps. A full week after the storm, four of our traffic lights were still not functioning. In summary, it took approximately ten days for all of our traffic signals to be properly cycling. Rather than sitting idle in our Village Hall parking lot for hours, it may have been possible for the eight trucks to be deployed to solve significant local concerns.

## **ConEd: Municipal Relationship and Customer Service**

*Problem Statement:* ConEd does not treat municipalities as their partner in addressing outages. Rather than share accurate daily crew deployment information, daily outage reduction goals, and coordinating crew deployments to minimize downtime and maximize restoration work, municipal governments are treated as a combination of extra ConEd resources, i.e., supplementary tree crews, supplementary traffic protection, and extra customer relations personnel. All the while, timely crew scheduling and deployment details are withheld and coordination is absent.

*Recommendation:* Change the role and level of authority granted the municipal liaison. The liaison should have timely, accurate daily crew deployment and work plan information, the ability to direct local redeployment after initial task completion, and other more active incident management skills and abilities. At present, the municipal liaison functions largely as an assigned customer relations person, only able to relate generic insights and make referrals without a resolution commitment. The ConEd goals appears to be mollifying municipal officials rather than establishing a productive emergency management relationship. As the process stands, it is inefficient and not transparent, begging the question of how and when crews are being deployed to certain municipalities and not others with equal or greater need.

### *Illustrative Local Experience*

- Daily ConEd Briefings – Municipal Communications

Daily ConEd telephone briefings were inefficient and time consuming, largely comprised of municipal officials lobbying for more restoration crews to be deployed in their respective jurisdiction, ultimately raising more questions about the process used for crew deployment decisions than providing answers about the outage's remaining duration.

ConEd should consider a different approach, one that more effectively uses the municipal liaisons deployed on-site. During the crisis, Scarsdale was advised by ConEd leadership that our municipal liaison would provide us with a detailed work plan for the following day, including how many crews were being deployed locally and how many restorations were anticipated for the day; we never did get any such information from the liaison, and in following-up with our liaison we found that he had no ability to secure and provide such information.

During one ConEd municipal briefing, we were advised that the community-wide restoration target was Sunday at 11:00 PM. Upon sharing that information with our residents after the call,

the online outage map updated about 15 minutes later, bumping the restoration target another day. It wasn't long after that when residents began receiving text messages that the target had moved another day to Tuesday. The shifting restoration targets highlighted in the public eye the absence of effective communication between ConEd and the Village of Scarsdale, calling into question the validity of the restoration targets being announced and making it more difficult to communicate with rightfully agitated residents.

- ConEd Customer Service

For members of our community, ConEd's outage and restoration information was inaccessible, incomplete, not reliable, and sometimes blatantly wrong, with ConEd personnel having endeavored to shift responsibility for certain failures to local police, fire, and public works personnel. Failure to resolve a dangling live wire was attributed to our fire department's failure to respond to the scene. Crews sitting idle were blamed on our police department refusing to provide flag personnel (which never occurred), and delays in tree removal were again attributed to municipal personnel not performing the work. Each of these pieces of intentionally misleading information complicated the emergency response and resulted in multiple unnecessary contacts with Village personnel to respond to ConEd's misrepresentations. To compound the problem, we experienced similar problems in 2018 following the Riley/Quinn storms.

Because of the information vacuum ConEd created, as well as the lack of trust in what little information was being shared by ConEd with the public, ConEd's customer service responsibilities shifted to local officials and Village staff. Village personnel undertook a number of communication strategies in an effort to close the information gap. However, incomplete and incorrect information hampered such efforts, as well.

ConEd must step-up during outages and take command of their public communication responsibilities. Timely, accurate updates are essential in managing an extended outage. Shifting that responsibilities to municipal governments is not an acceptable alternative, and the practice of blaming municipal officials for a plethora of ConEd leadership and supervisory failures must stop.

- Outage Map

During much of the extended outage, the location function was disabled, making it impossible for municipalities or their residents to view outage and restoration target info for individual properties. Why was the location deactivated and why was it made unavailable for so long?

## **Smart Meters and Smart Infrastructure**

*Problem Statement:* Smart meters and smart infrastructure are supposed to provide customer-facing benefits, including minimizing outages and helping to identify outage locations and extents when they do occur. When combined with such technologies as smart substations, smart closers, etc., they may stop outages from cascading through a system, thereby isolating smaller outages before they become larger ones. Although ratepayers have paid for ConEd's smart meter rollout, it seems the customer-facing benefits may have been neglected. Why, for instance, must a customer notify ConEd of a power outage? Isn't that one of the most basic of customer-facing benefits, i.e., the utility knows when you're out of power and acts proactively to solve the problem?

*Recommendation:* ConEd should provide a thorough update to the NYS legislature on the status of the smart meter rollout, particularly with respect to each promised or potential customer-facing benefits available through smart meters and other smart grid infrastructure.

### **Reliability Reporting and Regulatory Performance Targets**

*Problem Statement:* The Annual Electric Reliability Performance Report does not analyze Westchester County separate from NYC and Long Island, thereby clouding discussion of ConEd's Westchester County performance. Inasmuch as Radial and Network distribution systems call for separate metrics, differences in land use and customer account densities would also seem to be important analytical distinctions to make.

*Recommendation:* Modify the Annual Electric Reliability Performance Report to include discrete performance metric reporting for Westchester County. We are unable to assess ConEd's performance quantitatively without metrics to inform the discussion.

### **Tree Trimming Program**

*Problem Statement:* Downed trees continue to be a problem in the wake of storms of varying strengths. While municipalities such as Scarsdale have adopted planting protocols restricting the height of trees planted near power lines, we are wondering about the status of ConEd's trimming program.

*Recommendation:* Request ConEd to present its future tree trimming programming schedule and to detail whether that program has progressed according to the established schedule for the past five seasons.

### **Summary**

Thank you for working on behalf of the Village of Scarsdale and Westchester County to conduct a public hearing on ConEd's response to the remnants of Tropical Storm Isaias, one focused on developing lasting improvements in their infrastructure and operations in order to shield communities from the adverse impacts of extended power outages.

Respectfully submitted,



Mayor