

To whom it may concern:

73 yrs old retired from the CL& P in 1958 after 35 years of service. I spent many hours in storm restoration. I would like to share with you some of my experiences. From 1958 to 2011 many years have gone by, I have been out for 18 years now. My first observation has been, have we replaced permanent help for retirees? If so how many are we using of our retirement crews to the best of our abilities? There are no two storm the same, there are tropical storms, hurricanes, wind, rain, snow, ice storms that are all treated differently. The first issue to consider is continuity our safety rules and make sure that people is in tact with switching and tagging procedures. Important tailboard discussions on who is going where would qualify personnel. There is a long list of safety rules to follow. I have been educated with safety and switching and tagging taking clearance to our lines, work with convex and four divisions in the entire state. I have worked in sub stations and on transformers, circuit breakers, vacuum transformers at Millstone, CT Yankee and local substations with electrical line and cable crews. Also I have experience in switch gear and all qualified personnel and people who work in the area, making sure they are familiar with where they are going. This is a priority list. First all the storms are being monitored during the storm command decisions have to be made by ISO Millstone, dominion and other areas with generating capacity. Generators and transformers may be taken out by protective relay in all high tension lines. Sometimes decisions may be made to protect generators and transformers by qualified control operators and sub station electrician to shift load around. Maintenance and lack of experience help is becoming an issue. Safety issues, maintenance issues, lack of experienced help, and training new crews tells me that we should consider putting on experience retirees on board and make sure we have exhausted all the experienced line crews, electrical crews, cable crews, and gas crews in the state . In other words we should seek out all experienced crews throughout CT before we consider bringing in outside crews from other states.

Signed Nick Coscia 35 years lead electrician of Northeast Utilities.
Safety is #1
Local 420 and 457 IBEW retired member
coscianick@yahoo.com

88 Cabin RD
Colchester CT 06415
September 9, 2011

Dear Mr. Jeff Butler, President and CEO of CL&P and
Mr. John Ireland, Director of Claims and Insurance, CL&P

We are writing to inform you of our experiences with CL&P due to Hurricane Irene. We have been lifelong residents of Connecticut and have always been customers of CL&P. On Sunday August 28th at 6:30am, our power went out due to a tree on the street line on our property that came down and took the power line from our house down with it. The tree and line fell into our yard not into the street. We immediately called the CL&P hurricane number (1-800-286-2000) to report it and left a message as no one answered. At that time, we did not know if it was our house only or the street that was also out. A short time later, we called again and reported it directly to someone. We specifically told the representative that the line was pulled from our house by a tree. They told us not to touch the tree or the wire. A short time later, we received a call back from our first message and were told the exact same thing. At that point, we also knew that a portion of our street was out and we called the Colchester (1-860-531-8855) hurricane emergency number. They also told us not to move the tree or touch the downed wire.

By Tues August 30th, we knew we had many large trees and branches down in our yard. The tree that had pulled the power line was not that large and my husband believed that he could move it. We again were told by a representative not to move or touch the tree and that the estimated time of restoration would be that evening by 10pm. By Thursday morning, our power was not restored but that of our neighbors was. Theirs had been restored Wednesday night. We knew that the reason was, was that our line was not connected. We called Thursday morning around 7am to be told that we should be restored by that evening. In the meantime, we had an arborist come out due to the extent of tree damage to our yard. In his cleanup, he moved the tree that had taken the wire down. When he was done, he called CL&P to indicate that he believed that the wire had "juice" in it. He was told that our house would be moved to an emergency status and instead of being restored by 9pm; it would be restored by 7pm that evening. My daughter also checked by computer and it showed restoration by that evening. 9pm came and went and no CL&P and no power. At 10pm, I called the Colchester emergency hotline to report what we had been told and the fact that we potentially had a dangerous situation in our yard. We were told that since it was dark, that it probably would not be done that night but that the first selectman would bring it to CL&P's attention the next morning. Keep in mind that within 5 minutes (walking distance) from our house that there was a sign that indicated CL&P had a small storm post set up. The back of the CL&P sign read, "Safety is Our Core Value." That night at 10:30pm, a town employee stopped in front of our house to make sure we had turned off the major power circuit to our house. I told him yes.

On Friday September 2nd, our power had still not been restored. My husband called CL&P again to speak to a supervisor. He explained the situation to Veronica and repeated everything that we had been told. Now, remember that all this time we have been told not to touch the tree and we have a potentially live wire in our grass. Veronica indicated that she would try to have someone get back to us but that the times we were given all week were estimates and not guarantees, (no one else told us that). No one did get back to us that day. Our neighbor in the meantime, sent a licensed electrician over to see what they could do for us. At this point, we were 2 days past our neighbors, no CL&P truck or tree truck had ever stopped by to check with us and we were not being called back from our morning call. We ended up paying the electrician \$200.00 to hook our house back up and restore power. As far as CL&P was concerned, we still had no power and had a potentially dangerous situation. The electrician also indicated that he felt it was an unsafe wire as when he tested it, it was live.

On Saturday the 3rd of Sept. around 4:20pm we received an emergency call back from CL&P asking if we had power. I told them yes, but not because of CL&P. I asked the woman who I could send the bill to (enclosed) for reimbursement and asked her if as far as CL&P was concerned, were we still out of power? She said that we were showing as not restored. She said that full restoration would be done by Weds Sept. 7th.

The one positive note is that everyone we spoke to at CL&P and at our town command center was extremely polite and receptive to what we had to say. Our concern is that we were given information that was not followed up on in light of the fact that we could have had a dangerous situation which all parties were made aware of from 6:30 am on Sunday the 28th. CL&P at all times indicated that they would take care of both the tree and the wire. Luckily, no person or pet got hurt. Quite honestly, we have no idea how long we would have waited, as obviously it would have been after Saturday at 4:20pm which would have been 3 days after our neighbors were restored.

We feel that it is very important that this situation be brought to your attention and are also requesting that the \$200.00 be credited to our future CL&P bill. Thank you.

Sincerely,



Steven and Joan Gates, homeowners

Cc: Gregory Shuster, First Selectman of Colchester
Linda Orange, Representative
Eileen M. Daily, Senator

Doyle, Dan

From: energymail
Sent: Friday, September 23, 2011 11:37 AM
To: AfterIreneCT
Subject: FW: CL&P

From: maryann oneil [mailto:maryannoneil164@yahoo.com]
Sent: Tuesday, September 20, 2011 9:12 PM
To: energymail
Subject: CL&P

Even though CL&P charges the highest rates in the United States, their staffing seems inadequate, even in normal times, and a simple job like a new meter installation is not accomplished in a timely manner.

The performance of CL&P during and after tropical storm Irene highlighted the lack of planning, the dearth of leadership, the absence of communication on the ground with municipal leaders, and companies brought in from outside, who just sat at sites waiting for direction, and customers, who sat in the dark looking at downed trees and downed lines on state highways.

Organizational plans should have been put in place when the storm's path was predicted a week ahead. The company needs to develop a system to supervise outside help, to communicate with customers and community leaders, and to have adequate staff to work on all the areas under their control in the state.

Raising rates after their woeful performance is unconscionable!

Robert O'Neil
Mary Ann O'Neil
229 Rt 164
Preston, CT 06365

Doyle, Dan

From: MacDonald, David
Sent: Friday, September 23, 2011 11:36 AM
To: AfterIreneCT
Subject: FW: IRENE COMMENTS

From: Halanator@aol.com [mailto:Halanator@aol.com]
Sent: Friday, September 23, 2011 11:31 AM
To: MacDonald, David
Subject: IRENE COMMENTS

ALTHOUGH CL&P HAD PLENTY OF ADVANCED NOTICE ABOUT THE STORM, THEY WERE DEFINITELY NOT PREPARED. WE HAVE SOME OF THE HIGHEST ELECTRIC RATES IN THE COUNTRY AND SHOULD EXPECT BETTER SERVICE AND RESPONSE TIME.

WE HAVE WELL AND SEPTIC AND WERE LUCKY TO OBTAIN A HOTEL ROOM WHEN OTHERS WERE NOT.

THEY NEED TO PRIORITIZE HOMES ON SEPTIC AND WELL.

THEY NEED TO BE BETTER STAFFED

THEY ARE VERY WELL PAID AND THEIR POOR RESPONSE AND HANDLING OF THIS SITUATION WAS TOTALLY UNACCEPTABLE.

WE HAD TO STAY IN HOTEL FOR 6 NIGHTS AT A COST OF OVER \$1,000.00 WHICH THE INSURANCE COMPANY DID NOT REIMBURSE.

THANKS FOR ATTENTION IN THIS MATTER

Energy & Technologies Committee
Hearing, September 26, 2011
Testimony of Joel N. Gordes, Environmental Energy Solutions
38 Brookmoor Road, West Hartford, CT 06107

Senator Fonfara, Representative Nardello, Joint Committee Members and Staff, good afternoon. My name is Joel Gordes and I am an independent energy consultant representing myself. I appreciate the opportunity to provide comments on Storm Irene¹ and what I believe must be done to add resiliency to the grid to meet numerous vulnerabilities, not just storms, in a holistic manner. A summary of my comments includes:

- The grid evolved into a complex system subject to stress, natural hazards, physical & cyber attacks
- “Distributed Generation” (DG) and “Decentralization” can enhance resiliency
- Smart Grid is promising but has its own security-based challenges
- Legislation/regulation needs to become holistic and drive resiliency via rewards in utility ROR

The Edison Model of an Electric Grid might today be called a “microgrid” defined as “... power systems in which generation elements are co-located with loads, regardless of the aggregated generation capacity or the grid interconnection.”² He also used direct current which could only travel about 1.5 miles with generators so inefficient that the power cost in today’s dollars would cost over \$6.00/kWh.

How Did Regulated Monopolies Emerge – Tesla and Westinghouse

- Larger, efficient AC generators having economies of scale were required to lower cost to consumers
- Power executives, manufacturers and bankers lobbied for monopolies & accepted obligation to serve
- Further distances of generators from loads drove grid architecture to require transmission lines
- It resulted in industrial growth of goods and services and overall greater freedom
- Greater profits for electricity providers
- Obvious and hidden vulnerabilities due to transmission that sets the grid architecture emerged. On this point, many utility executives may disagree but the prestigious National Science Council has warned:

A direct way to address vulnerable transmission bottlenecks and make the grid more robust is to build additional transmission capacity, but there are indications that redundancy has a dark side... The likelihood of hidden failures in any large-scale system increases as the number of components increases.³

Not the Trees Alone: What Are the Security Threats? (As Opposed to RAM, Sufficiency, etc.?)

- Fuel supply interruption/cost escalation
- Physical security of generation, transmission, distribution, Control Technology (SCADA)
- Foreign dependency via disruption of globalized supply chains for critical grid components (GSUs, etc.)
- Cyberthreats including distributed denial of service, hacking, electromagnetic pulse (including coronal mass ejections), embedded codes in foreign sourced components and weaknesses in SCADA/IPC
- A combined or “blended” combination of the aforementioned threats
- Other threats and considerations including “unintended consequences” of other actions

Distributed Resources. New technologies that lessen dependence on economies of scale to be efficient are available as building blocks for new microgrids. Often misunderstood, a composite definition is:

Distributed resources include conservation and load management with modular electric generation and/or storage located near the point of use either on the demand or supply side. DR includes fuel-diverse fossil and renewable energy generation and can either be grid-connected or operate independently. Distributed resources typically range from under a kilowatt up to 50 MW.⁴

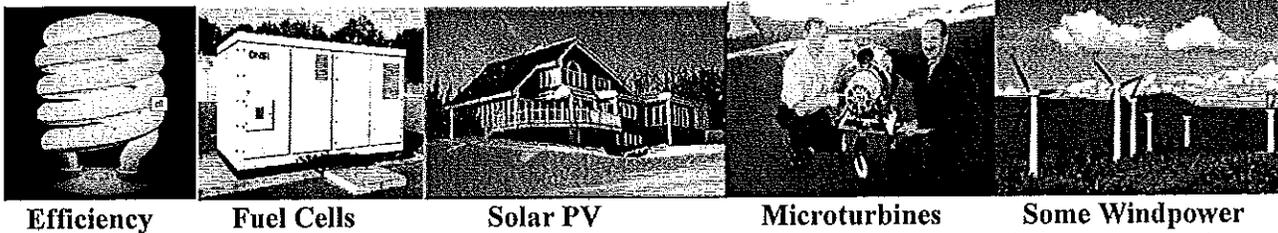
¹ Limited comments specific to Tropical Storm Irene appear on page 3 of this document.

²Z. Ye, R. Walling, N. Miller, P. Du, K. Nelson. *Facility Microgrids*. NREL. May 2005.

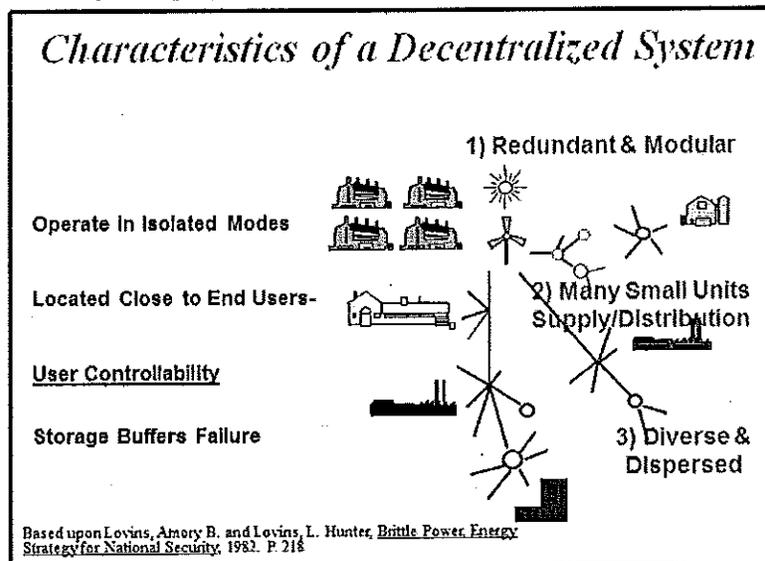
³ Making the Nation Safer: The Role of Science and Technology in Countering Terrorism. National Academy Press. p.302. June 2002

⁴ Composite definition of US DOE(2), EPRI(2), CEC(1), AGA(1). The term “Distributed Generation” has been credited to Dr. Carl Weinberg (former Research Director at Pacific Gas & Electric) and his group.

Some Forms of Distributed Resources/Distributed Generation



Decentralization for Resiliency⁵ Employs Distributed Generation (DG) That Can “Island”



Enter the Promise of Smart Grid⁶

- Improved reliability, security [maybe not] and efficiency through digital control technology
- Optimization of grid operation
- Easier interconnection of distributed resources and end use smart appliances
- Control of demand response down to the consumer appliance level
- Provision for storage technology including plug-in hybrid electric vehicles and all-electric vehicles
- Real time information on electric pricing for transactive procurement of power
- Requires overcoming barriers to adoption of Smart Grid technologies
- Requires standards/security provisions for communications and interoperability of connected device

Short and Long Term Recommendations

- Fully implement PA 07-242 Secs. 51-52 to obtain All Achievable Conservation/Load Management
- Plan Energy Resiliency into High Value Applications (hospitals, first responders, gasoline stations, telecom, sewage plants) by use of distributed generation including combined heat and power
- Provide Rates of Return for Utility Actions Favoring Resiliency (Use Decoupling/Other Mechanisms)
- Provide Incentives for DG, combined heat and power to utility & private sector players
- Implement a Long Term Plan Incrementally but With Annual Targets
- Minimize Transmission Projects and Investments to Avoid Locking Out Other Options
- Apply for DHS and Other Federal Funding to Implement Resiliency
- Make Insurers Partners to Reduce Their Losses and Contribute Their Expertise –and Funding

⁵ Lovins, Amory and L. Hunter. *Brittle Power*. Brick Housing Publishing. 1982. pp. 215-219.

⁶ ISO-NE. Overview of the Smart Grid Policies, Initiatives, and Needs. February 17, 2009. pp. 2-3

Comments Specific to the Preparation, Response and Recovery from Tropical Storm Irene

- This was a tropical storm, not a hurricane, but due to its relatively slow forward motion inflicted significant damage on the state's electric power infrastructure leaving more people out of power than any incident to date. One has to wonder what the result would be from a more intense storm.
- Preliminary assessments indicate lack of sufficient tree trimming may have played a major role BUT, like some many other actions, even tree trimming has a diminishing return and any plan to add true resiliency to the grid cannot begin and end with this one action. A solution to storm threats may actually exacerbate damage from other threats if not treated in a holistic manner.
- Some mission critical facilities were not able to operate due to loss of power and failure of back ups
- Similar facilities had experienced such failures in the past
- Communications to local officials and others could have been better

Two previous dockets both have some relevance to the issues at hand. These came from Public Act 07-242, An Act Concerning Electric and Energy Efficiency, a 200+ page bill. It had two sections that pertain either to electric reliability or energy security. I will very briefly address them here and provide further sources:

1) In Section 5 of the legislation, it mandated a study of electric system efficiency and response which was addressed in DPUC Docket 07-06-63 which was titled **DPUC Report to Connecticut General Assembly on Electric Distribution Company Staffing Levels, Public Notification Processes, and Service Restoration Response Time Relating to Electric Service Outages**. It was introduced by Rep. George Wilbur of Colebrook, Connecticut due to the many as the lengthy outages that took place in his district in the more severe weather regime of NW Connecticut. While I did not directly participate in the docket, at the request of a Colebrook official, I did make some comments on a copy of the final decision which identified some deficiencies (such as staffing levels for recovery) but which was inconsistent in this same section on page 8 . (The decision with my annotations may be accessed at http://www.box.net/files/0/item/f_940387528.) Parts of the decision take the word of the utility on some operational activities such as having consolidated offices to reduce cost having no effect on recovery activities but there is no third party substantiation of this AND the Department actually said it believes this contributed to "adversely affect response to outages and emergencies" but issued no order but only citing it did provide cost reduction. I noted at the time this set up a dual standard where one set of customers was "more equal" than others in the obligation to serve. Obviously, getting power back to the greatest number of people and critical facilities is in the public interest BUT those who are served by a lesser standard should maybe be considered for some rate relief.

2) Also in the 07-242 legislation was **Implementation of Section 8 and Section 54 of Public Act No. 07-242 An Act Concerning Electricity and Energy Efficiency**. This fell under the CT Siting Council (CSC) which established Docket #346 on Energy Security (See <http://www.ct.gov/csc/cwp/view.asp?a=962&q=396892>) which I did enter as an intervener under "Environmental Energy Solutions" or "EES" on a pro bono basis. Let me just say that I was extremely disappointed with the CT Siting Council's approach to this since resilience begins at the siting level when one looks at energy security in a holistic way. The electric grid, as noted earlier, is a complex system, and cannot be approached merely in a piecemeal manner but must be treated as a system and consider what the effect of adding one component or another does to the overall complexity and vulnerability of that system. In addition, this General Assembly had previously given a directive as far back as Public Act 03-140 for the CSC "to promote energy security" --a very important point--since by the time of this docket six years had elapsed. While the legislature had not provided much direction, CSC had not taken any initiative to so much as define what they understood "energy security" to mean. Docket #346 went on to say that CSC would not consider "natural disasters" to fall under security in spite of a motion made to specifically include that in order to be consistent with a document on security by a Presidential Decision Directive from 1998 that the CSC itself cited.

Some far better defined direction needs to be provided to this agency so they may more adequately meet their mandates. It should be made clear that the gnashing of teeth and protesting that they are an "environmental organization" should not be accepted or, if it is, incorporate them into DEEP without hesitation, something I would be sorry to see since many of the disciplines and mechanisms found in nature have direct application to aspects of energy security.

Doyle, Dan

From: jeharvey01@snet.net
Sent: Friday, September 23, 2011 9:51 AM
To: AfterIreneCT
Subject: Storm Irene

To whom it may concern,

I feel that CL&P's priorities and procedures after damaging storms should be changed.

I am a former SNET Outside Network Designer and spent 15 years working with CL&P Field Technicians designing utility pole lines

Restoring power is very important but I feel that clearing downed trees that involve power lines from the roads to allow emergency vehicles (police, fire, and ambulances) passage is equally important.

The power companies should send out their Field Technicians and Engineers to disconnect the power going up roads where the wires are down. A line truck is not required to do this. The Technicians have a telescoping pole and special gloves that they can use to disconnect the power while standing on the ground.

This way town public works departments, fire departments, and supervised volunteers can clear the downed trees from the roads.

If this is mentioned to the utility companies they will probably play the "safety issue card", saying that if someone has a generator improperly installed and is sending power back to the lines on the street someone could get hurt. I feel that the chances of this are very slim. If someone sent power to the pole line on the street it would go to every building that was still connected to the utility lines and the load would cause the generator to shut down. Clearing roads should have a much higher priority!

Respectfully,

James Harvey
32 Cowles Road
Willington, CT

860-487-1141

jeharvey01@snet.net

Doyle, Dan

From: Sherrilynn Granberg [sherrilynn.g@att.net]
Sent: Friday, September 23, 2011 9:14 AM
To: AfterIreneCT
Cc: attorney.general@ct.gov; ltgovernor.wyman@ct.gov
Subject: CL&P, Insurance & the storm

To Whom It May Concern,

I am writing this e-mail about the failures of CL&P during the recent storm. The length of time it took them to get our power restored was ridiculous. We were without power for almost six days. The company is lying by placing all the blame on the trees taking down the power lines. First, throughout the years CL&P has cut their budget for tree removal thus making the very problem they are complaining about happen. Second, they have also cut their budget for general line and pole maintenance so when the storm hit the poles were already weakened from years of neglect. My husband who works for AT&T said that many of the poles that went over were rotten. So when CL&P was restoring power they were also doing the maintenance that should have been done all along. During storms in previous decades, including the two big storms in the 1970's we got power restored sooner and they were bigger storms. This company needs to be seriously investigated and I do not feel that the consumer, state or federal governments should be responsible for the cost that CL&P incurred fixing their mess.

In addition I also would like various insurance agencies looked into regarding waving the deductible for storm damage. My insurance is refusing to cover my 275.00 loss of food because they say that it wasn't a hurricane by the time it hit us and therefore doesn't meet the standard for waving the deductible. Again, I believe this to be wrong. The state receive a tremendous amount of damage which was compounded by the failure of CL&P so my family pays the price because it wasn't a hurricane?

I hope you will both look into these matters and I appreciate your time and efforts.

Sincerely

Sherry Granberg

860-423-9656

9/23/2011

Jeffrey D Lee
27 West Highland Rd
Mansfield Center, CT 06250

To: Whom it may concern:

September 3, 2011

Re; Connecticut Utilities Storm Failures

AT & T in Connecticut has created design flaws in its infrastructure that created unacceptable outages during Tropical Storm Irene.

They AT & T, with intent, never placed permanent emergency generators or even robust battery back-up systems at their "SLIC" sites and "DSLAM/ATM" locations which allowed local "POTS" (Plain Old Telephone Service) lines to fail at an extremely high rate and at a very bad time. AT & T would probably tell you that they provided equipment and services that met acceptable industry standards, but who would support having these very minimal industry standards when attempting to utilize these nonexistent systems for a life threatening emergency in your household during this storm emergency?

Many Connecticut customers were no longer able to dial E-911 or any other number from their POTS line do to corporate malfeasance and greed. We in Connecticut had come to expect the very best in reliable landline telephone service for many years when the utility was locally owned and managed by SNET, but that is no longer the case under the current AT & T ownership and past oversight from the State of Connecticut DPUC. The consumers in the State of CT were the big losers during this storm and the CT DPUC allowed AT & T to create a very unstable network that failed when Connecticut's citizens needed it the most.

The safety of Connecticut citizens was absolutely in jeopardy in the aftermath of this storm and AT & T failed miserably to maintain their wire line infrastructure for the public good.

The loss of the utilities DSLAM/ATM infrastructure also caused internet failures even if the consumer still had commercial or generator power at his home. The emergency information that was being sent out by the State of CT and local municipalities via internet was not received because of cost cutting design flaws that allowed the utility to not maintain services beyond a few hours at the very best from the these ill designed systems. Connecticut consumers were striving to obtain accurate and timely information and almost all currently acceptable wired telephone and internet transmission systems failed during and shortly after the storm.

Solutions: The State of CT should enact and enforce the following or similar minimal regulations through state tariffs and or legislation.

#1 "All" landline service providers operating in Connecticut shall maintain emergency power sources at all critical infrastructure points to ensure that "all POTS and IP based phone circuits" stay live for a

minimum of 336 hours without any human intervention, "unless" the telco or CATV cable servicing that area or home has been deemed unusable due to physical damage or localized flooding. Furthermore these same telco utilities should be required to maintain all "T-1" type circuits for the same minimum time standards. It is now widely understood that the vast majority of Verizon Wireless site failures during this storm were due to the inability of Connecticut AT & T to provide emergency power to the T-1 lines bringing phone circuits to these critical cellular sites.

#2 "All" Cellular service providers operating in Connecticut shall maintain emergency power at individual cellular sites for a minimum of 336 hours without any human intervention. The utility may obtain a certain amount of waivers for various sites that may not lend themselves to emergency power on a localized level but the waivers should be very far and few between.

#3 "All" utilities providing the above telephone, cellular and internet services to consumers in The State of Connecticut shall be required to maintain a percentage of "back up" emergency generators within the State of Connecticut's borders that would enable rapid deployment to individual Connecticut sites where permanent generators and or batteries may have failed or been depleted, during the course of the of the emergency or storm.

#4 "All" utilities conducting business in The State of Connecticut shall strive to maintain emergency power systems for much longer than the aforementioned 336 hours. The State of Connecticut must set minimum acceptable time standards for emergency operations of these providers and their services at the very least and these issues should be taken up and considered jointly by Utility Control at DEEP and legislatively at the State Capitol. We should strive to have the very best systems not just industry acceptable systems.

This correspondence is not intended to besmirch or belittle the hard work of Connecticut's front line utility workers who strive to provide the very best in services to Connecticut consumers with less and less resources due to corporate greed. This letter is more of a critical critique of poor management decisions at the very top levels of these corporations who have decided corporate and personal profit was much more important than providing dependable utilities to the very consumers who pay dearly for it and expect much better reliability and services than they currently receive in the State of Connecticut.

Respectfully Submitted; Jeff D Lee

Doyle, Dan

From: john magnesi [magnesij2003@gmail.com]

Sent: Thursday, September 22, 2011 8:56 PM

To: AfterIreneCT

Subject: Response of utility companies to storm "Irene"

I have just a few questions to raise at this hearing about the responsiveness of the electric power companies in Connecticut to storm Irene.

1. The utility companies disclosed that they had engaged out-of-state electric repair crews to address the downed power lines and other power outages that occurred in Connecticut. Did CL&P or United Illuminating have plans in place to first engage Connecticut residents (who may have been licensed and available to do this work) before seeking out of state crews ?

2. I believe that I heard that many of the out-of-state companies brought in to Connecticut by CL&P and UI to address the downed power lines and the power outages were referred to as "independent contractors." The term "independent contractor" has legal significance especially in the area of the labor laws of this state. For example, during the years when I worked at the Connecticut Labor Department, I had to investigate numerous cases where people categorized in this manner were, in fact, miscategorized. They should have been treated as employees not as "independent contractors." As a consequence of the miscategorization of workers (who should have been treated as "employees"), these alleged independent contractors were frequently told to be responsible for their own insurances, taxes, and other duties related to consumer protection and licensing. Connecticut, in many instances, failed to receive proper tax payments and failed to attain regulatory compliance especially in the areas of licensing and consumer protection by these alleged "independent contractors." In light of this, what specific steps did UI or CL&P take to assure that not only were its out-of-state sub-contractors properly licensed and in compliance with consumer protection requirements here in Connecticut but also that the workers engaged by these out-of-state sub-contractors were similarly in compliance with Connecticut regulatory requirements ?

3. During the storm, Governor Malloy stated on a number of occasions that if people in our state had, in the past, experienced power outages for extended periods, that they should reasonably anticipate similar delays in restoring their power as a consequence of this storm. It appeared that he regarded such a delay as reasonable. On 9/11/2001, attacks on this country exposed the vulnerability of our infrastructure to breakdown and / or shutdown due to an attack. A few years later in 2005, Americans witnessed in New Orleans storm Katrina with its devastating impact on the power grid and other aspects of our infrastructure. In effect, this state has had years to prepare for large scale disruption to our electrical power grid as a result of an emergency situation. Consequently, why should residents of this state have been told to anticipate similar delays as in the past if power was disrupted ?

If anything, given the advance notice of a need to be prepared, shouldn't the customers of the utilities have anticipated an even shorter wait period for restoration of power due to a storm rather than an equally long delay as in the past - or possibly, an even longer delay than in the past ?

4. Finally, it has been reported in financial journals that the compensation plans of many of the top executives of the power companies runs into the millions of dollars. The CEO of Connecticut Light and Power, for example, was reported by Bloomberg Financial News to have received in excess of 4 million dollars in compensation in 2010. When pro-rated over the number of days in

9/23/2011

a year, this level of pay is equal to well over \$10,000.00 per day - every day of the year. In addition, other top executives of the power companies were also reported, by such sources as Bloomberg, to have similar million or multi-million dollar compensation plans. Given these levels of compensation, why were there not more maintenance crews on the payrolls of these companies? Given this information, it surely could not be attributable to a lack of funding or a lack of financial resources on the part of the company. I would seek a response.

Thank you,
John Magnesi
7 Partridge Run
Wallingford, CT 06492



Life Care Services

LLC

Critical Emergency Planning Guidelines

**Life Care Services, LLC
Judi Buxo, VP of Equity Communities**

June 2011

The emergency planning guidelines below represent critical thinking and planning requirements to ensure that the senior care environments are well prepared to endure emergency events and aftermath survival efforts. Plans should be developed by each facility and be specific to the nuances and special needs of the setting.

One should assume the following impacts and outcomes will result from most emergency situations. The guidelines should be considered comprehensively in March of each year or ahead of anticipated storm season, keeping these elements in the forefront of planning decisions.

The aftermath expectations:

1. Critical resource plans and supply lists must endure beyond 72 hours. Most supplies and resources will be inaccessible locally; therefore resource acquisition shall be obtained through a group purchasing entity who may act as the liaison for supply orders outside the disaster affected area.
2. Power and water restoration as well as routine resources such as fuel will be unavailable at times and often for extended periods, generally up to 10 days.
3. The development of resource relationships with corresponding communication strategies must occur early, 6-8 months prior to the commencement of the June 1 – November 31 emergency weather 'season'.
4. Evacuation orders are earlier and for longer duration than previously experienced. Plans should be in place for alternate living arrangements should the community be uninhabitable post storm event.
5. Be prepared for good state approved emergency plans to fail and have back up plans established. Resources must focus on survival in the most unimaginable of situations and back up plans are essential as planned services often do not come to fruition.

6. There are not enough Skilled Nursing Facility beds generally speaking to always transfer Health Care residents to a like facility, so creative solutions must be identified to triage SNF residents in alternate physical locations.
7. 911 and other emergency services will be suspended and thus only life threatening situations will be addressed by the local hospitals. Emergency management plans will be required to address critical patient care needs absent the use of hospital emergency rooms. Local Lab, X-ray and other contracted support services will likely be affected by the storm event, so back up resources will be needed.
8. Staff members will be affected by the storm event, so plans should be made for back up staffing requirements from outside the affected area.
9. The communication infrastructure may be obliterated, so emergency communication processes should be explored for alternate ways to communicate. Expect phones, cell phones, E-Communications, and electricity to not work, thus alternate communication plans must be established so as to effectively let family members know the status of their loved ones, facilitate supply and resource needs and manage emergency issues that arise.
10. Temperatures may be extreme, so efforts to prevent dehydration, ensure skin integrity and prevent hyperthermia or hypothermia are measures to be assessed and addressed as needed.
11. Water will be contaminated and so emergency drinking water must be on hand, plumbing issues must be managed and non-potable sources identified.
12. Cash will likely be the only resource to pay for supplies in the local affected area. Credit cards will not always be accepted.
13. Safety and security provisions should be considered because desperate people will take desperate measures to survive and crime may be expected.
14. Fire and emergency electronic systems may not function, so assume the need to manage fire watches which are labor intensive.

Resources to 'plan for' include the following:

1. Generators and contracted electrician

- i. Know in advance what the generators are hooked to. Critical elements include: Cooler, ice machine, Cooking facilities, emergency outlets for fans and O2 operation, elevators, lift stations, laundry, A/C and critical lighting such as bathrooms and common areas where residents will gather.
- ii. Have relationship with electrician (See Contractor Management Standard) who is qualified to safely change generator connections based upon needs. Staff members are generally not qualified or skilled to address this task.
- iii. Know in advance how much fuel will run the critical connections for what period of time and based upon how much fuel is stored on-site, how long can the community function with its personal resources. Expand fuel tank capacity where possible.
- iv. Identify fuel delivery resources through local suppliers as well as state petroleum associations.
- v. Temporary generators may be used from time to time. In such an event, equipment should be set up away from air intakes to prevent carbon monoxide poisoning and located where they are not vulnerable to flying debris. Wiring should be secured and safe from accidental damage, fuel should be safely stored and caution should be taken to prevent over-load situations that result in over-heated generators which may result in a fire hazard.
- vi. Confirm emergency phone contact numbers.

2. Ice/Water/Water sources/plumbing

- i. Plan water resources for both potable and non-potable purposes.
- ii. If possible, install on-site water storage tank. If not, identify all sources of water such as Water heaters, Wells, bottled water, blister containers that hold 5+ gallons etc. Denote whether the source is potable or not potable. Ensure adequate supply is on hand.
- iii. Ensure method is established for managing sewage. Ensure residents and staff members are trained in method of flushing with non-potable water. Port-O-Potty service should be contracted in

the event that lift station is inoperable. Establish contract a with sewage-removal company who can evacuate lift stations when all other efforts fail.

- iv. Average amount of water needed: 3 gallons per patient/resident per day for potable water.
- v. If facility is sprinkled for fire purposes, back up plan should be developed to manage situation in the event of their inoperability. Arrange fire watch protocols, ensure additional extinguishers are available throughout the facility and have a 'no candles' policy for lighting to ensure prevention of accidental fire.
- vi. Encourage residents and staff to be self sufficient with water supply.
- vii. Confirm emergency phone contact numbers.

3. General Contractor/Building Structural Engineer

- i. Ensure pre-storm contract with a general contractor/or Building Structural Engineer whose purpose is to assist with assessment of community habitation post storm event. Further, the role of the general contractor/structural engineer can be expanded to manage the subcontractors, restoration personnel and the debris removal contractors.
- ii. The general contractor may also be engaged to assist with employee housing damage. The quicker the employees get assistance to address home damage, the quicker they return to work.
- iii. In the best scenario, the general contractor/Structural Engineer is located at the site prior to the storm to also assess readiness activities, provide guidance to the Plant Operations Director and be available immediately following the storm so as to expedite re-habitation.
- iv. Confirm emergency phone contact numbers.

4. Restoration Company

- i. Coordinate a contract with a restoration company in conjunction with insurance company to ensure that the actions post storm event will be consistent with insurance company expectations.

- ii. Pre-negotiate costs associated with the desired services to prevent price gauging.
- iii. Detail responsibilities such as water extraction, furniture movement or elevate furniture with foil or Styrofoam to prevent water penetration (may need a moving company as well to assist with these tasks if not covered by the restoration company's contract), boarding up windows, pulling up wet carpet, mold remediation, etc.
- iv. Confirm emergency phone contact numbers.

5. Roofing Company

- i. Negotiate roofing contract well in advance (perhaps with a company that already repairs roofs for the community). Ensure contract prices will hold during the emergency situation to avoid price gauging.
- ii. Introduce general contractor to roofing company contact to ensure communication efforts result in desired outcomes.
- iii. Determine what priority the community is compared to other work the roofing contractor may have.
- iv. Identify and have on hand all of the necessary supplies to ensure that a temporary roofing fix can be made to mitigate further water penetration until the permanent roofing repairs can be made.
- v. Confirm emergency phone contact numbers.

6. Food/supplies

- i. Have residents and staff members plan for own food and survival supplies for period of 10 days.
- ii. Make arrangements for food and supplies to be drop shipped by Purchasing Services, to location of emergency where staff and residents will be housed. This saves a tremendous amount of labor time in loading and unloading efforts.
- iii. Identify method of ensuring that food and supply deliveries will continue when communication of needs is interrupted.

7. Transportation

- i. Develop contracts with multiple bus companies to ensure evacuation transportation if needed. Be sure busses have restroom facilities.
- ii. Know travel restrictions as dictated by specific companies. For example if winds reach 35+ MPH will transportation opportunity cease?
- iii. Make certain that transportation is for departure and return home.
- iv. Develop directions that are specific and detailed that take into account the routes to be used in the event of an emergency. Certain bridges/roads will be closed at some point. Determine primary and secondary routes. Avoid, to the extent possible, bridges and low-level roads.
- v. Ensure emergency phone contact numbers.
- vi. Plan what gratuities will be paid.
- vii. Ensure staff members are identified to assist with loading and unloading the more frail residents. Contemplate the physical needs when assigning staff to transfer the residents. Make certain training is provided for all employees who will assist in resident transfers.
- viii. Develop plans for back up fuel needs.
- ix. Ensure supplies for the bus are well thought out and planned (first aid, water, medications, snacks, Oxygen, wet wipes, and incontinent products). Research appropriate ways to transport Oxygen.
- x. Stagger departure times so as to ensure that all residents do not arrive at evacuation sites at the same time. This prevents chaos and ensures proper hospitality efforts are achieved as residents are assisted to their accommodations.
- xi. Confirm emergency phone contact numbers.

8. Housing/Hotel logistics for evacuation purposes

- i. Identify housing location for skilled nursing residents that is in like facility. This effort will likely be provided by a sister facility, but not always. A formal contract and operational protocols should be established with receiving facility. i.e. Where will the residents sleep, dine, receive personal care, receive assist with restroom needs, medications, engage in activities; how will their dignity be maintained. Where will the staff take breaks, sleep, shower, eat, prepare food, chart/document, etc.? Hospitals should not be depended upon for transfer of SNF residents as they are actively discharging and cannot accommodate our residents unless life threatening.
- ii. Identify housing location for IL/AL residents. May be in hotel, but not always. If so, pre-negotiate rates. Should plan for local hotel, but also for facility inland more than 3 driving hours away. Identify same issues as above and additionally include the following: How will emergency needs be managed and communicated; triage residents based upon needs (dementia, ambulation assist, terminally ill, medically complex, oxygen dependent, dialysis dependent, etc.); How will medication be acquired when the IL resident forgets to pack it?
- iii. Have floor plan and housing assignments prior to evacuation.
- iv. Meet with receiving facility staff to determine whose staff will do what and determine what facilities will be available for use.
- v. Identify methods of communication with residents and detail how this will be accomplished absent electricity.
- vi. Where will supplies be drop shipped and stored?
- vii. Identify back up housing strategy in the event that community and evacuation site are uninhabitable post storm.

9. Staffing

- i. Establish clinical staffing assignments in each location and ensure adequate clinical staffing to meet the needs of the population.
- ii. Assign staff to pre emergency event and post storm event teams. Communicate when the staff is expected to report and under what circumstances, e.g. report post storm once winds drop below 35

MPH. and listen to radio channel X and T.V. channel Y for information about returning to work.

- iii. Identify in the employee handbook what is expected of employees with regard to their participation in the emergency event and illustrate the consequences for non-compliance. Establish which employee situations are exempt from working the pre-storm activities. For example: single mothers/fathers with child under 1 year old; parent with disabled child; parent caring for aging parent; parent who has children, but spouse has hurricane emergency responsibilities as part of employment. These exempt Employees should be advised that they are required to report to work as soon as the storm winds are below 35 MPH. Employees shall seek permission upon hire and have documented where they fall into these categories. If the employees who have exclusions are not able to help with the evacuation, they shall be expected to assist with pre and post activities.
- iv. Establish 12 hour rotating shifts with sleeping break times scheduled.
- v. Ensure housekeeping, F & B, and maintenance staff are properly assigned for intense clean up needs and meal service needs.
- vi. Establish list of duties for the various employees so that they know what their responsibilities are once in the emergency readiness mode.
- vii. Develop pay expectations and communicate this to employees, i.e. overtime compensation, round the clock compensation, establish beginning and ending timeframes for the additional compensation. Organize bonus payment plans. Consider compensation during all hours the employees are with the evacuation team. Compensation should be provided even for sleep hours as they are on call to assist. Ensure plan is consistent with Wage and Hour laws. Provide method of providing paychecks where IT systems are not functional; this should be coordinated to include cash payrolls where possible.
- viii. Complement clinical staffing protocols with Home Health Personnel and Case Managers through Home Health group. In the hotel setting these staff members can be assigned to care for a group of residents in a particular area based on triaged need. Discussions with home health Directors should be facilitated prior to the emergency event so that they are prepared to support the community's needs and support the execution expectations.

- ix. Establish the expectation about how children and pets will be accommodated. Set up day care setting managed by rotating employees. Or, if practical establish a relationship with a child care agency willing to provide services during an emergency. Establish contract and ensure management of the relationship is consistent with the 'Contract Management' Standards.
- x. Identify resource for auto fuel for the employees so that they are able to drive to and from work post storm event.
- xi. Identify a means to transport employees in the event they are dependent during the course of the emergency.
- xii. Creating the payroll payment register when the power or internet access is not available:

The preferred, and simplest solution, is to produce the payroll payment register with the hours and information available at the time it becomes evident that your facility may be in harms way.

It is understood that this may not always be possible, therefore your within your geographic region to share their access to the LCS infrastructure so that during an emergency, your accounting and payroll system functions and processing may be accessed thru this satellite location. Your same protocols and security will still be in place.

In an extreme emergency, it may be possible for personnel in the LCS IT department to produce your payroll payment register and send it by courier to your location, or to a functioning LCS facility near you. Understand this should not be relied upon as an alternative because it may not be possible for the payroll to be processed or sent to your location – the best way to insure that you will obtain a payroll payment register are thru one of the two previous steps.

Once you have obtained the payment register, it may be preferable to provide employees with cash. To facilitate this establish a plan through your bank relationship manager to make available the currency you will need to issue a payroll in cash. Normally a bank will have other locations in your geographic area that maintains a vault (the plan should not anticipate receiving the cash from the vault in your immediate area). Determine in advance, what denomination of currency will provide the series needed to pay each employee. Ideally the series of amounts will be smaller

(twenty dollar bills and below) so that they are actually useable by the employee. You may wish to pay to the nearest whole dollar – rounded up from the check stub amount.

If your main bank is not capable of providing this service, consider other regional banks within your area.

Contemplate securing within your plan, transport of the cash by an armored vehicle (you or your employees may not wish to transport this volume of cash personally). Your bank may wish for you to negotiate this directly with an outside provider, but they should be able to provide names of dependable couriers. Often this will require supplying the courier with copies of photo identification to the bank in advance that will allow the driver of the armored vehicle to release the funds to the signor (if possible more than one responsible employee should be on file with the transport company).

The emergency procedure plan with a courier may require an annual fee which secures access the priority access to transport.

Determine from your selected bank and courier the timing of how far in advance a request must be made of each to provide this service. Retain this information and relevant phone numbers in your emergency file.

10. Communications

- i. Communicate with residents and employees in May of each year to convey how the hurricane emergency management will be handled. Cover the following:
 - a. What type and amounts of supplies are they required to personally secure on their own. (Medication 30 day supply, Food/Water 10 day supply, luggage-1 bag limit, flashlight/Batteries/lanterns, clothing/toiletries, personal documents, sleeping bags etc.)
 - b. When, will certain services, such as: food, housekeeping, maintenance and transportation, be suspended. What is the food service expectation?
 - c. What are the evacuation plans and to where will the residents be evacuated?

- d. Let residents and employees know how they will be communicated with before, during and following a power outage.
 - e. Advise residents and employees to communicate with families about the LCS Hurricane website where up to date status information may be obtained every four-six hours by logging on to www.lcsnet.com. It is recommended that post cards be prepared each year containing this information and distributed to residents, employees and emergency contacts.
 - f. Advise residents and employees to communicate with families about the LCS emergency hotline where LCS home office employees will answer questions and secure required information about their loved ones throughout the duration of the emergency event.
 - g. Identify a spokesperson to manage the communication with the media. Ensure proper training in media management and organize public service announcements ahead of time so as to put the community in the most favorable light possible.
 - h. Advise the residents that in the event that an evacuation is ordered by the local and/or state authorities that the community will proceed with evacuation actions. Employees will not remain at the community, services will be suspended and this includes Health Care management, electricity will be turned off, etc. Residents need to be informed that if they refuse to evacuate it is at their own risk. They will need to sign a waiver releasing the owner of liability and accepting the responsibility of their personal decision. Confirm next-of-kin information. The emergency contact will be notified and advised of the situation. That individual will be encouraged to address the matter with the resident. The local authorities shall be notified to advise that there are residents who chose to 'not evacuate as instructed'. The names and key emergency contact information should be provided to the authorities.
- ii. ***Communication with state authorities, Insurance contacts, emergency management and establishment of an emergency command center and corresponding duties.***
- a. Meet early with insurance company or agency to determine what type of coverage the community has and what the

documentation protocols are post-storm event. Know when coverage is effective and understand what costs are not covered that should be budgeted. Coordinate communication protocols with the community's assigned adjuster and corporate risk manager to ensure post storm adjusting coordination. Know the insurance company's expectations with regard to evacuation. Understand the legal ramifications of not evacuating once ordered.

- b. Meet early with local/state Emergency Management personnel to ensure coordinated effort in the event that planned systems fail and the community needs emergency support post storm.
- c. Identify who among the personnel will be responsible for notifying the State Agencies as to evacuation status, location, and timing of return and departure.
- d. Establish an emergency command center (guidelines found in NFPA) that at a minimum accomplish the following:
 - i. Maintain accountability of all residents and employees.
 - ii. Maintain emergency contact information in centralized location and method for contacting those individuals during the emergency event.
 - iii. Maintain insurance information for timely assistance with claims adjusting activities.
 - iv. Maintain critical records.
 - v. Account for personnel work hours and reporting of such.
 - vi. Management of phone in-take and E-Mail communications, as well as phone messaging once evacuation has occurred.
 - vii. Posting of signage when evacuation has occurred indicating location and time of departure.
 - viii. Management of Media Relations, pre, and post storm. Coordination of public service announcements using support from Marketing

Department and all in conjunction with the 'Managing the Media during a Crisis' manual.

- ix. Ensure phones are used that provide the best coverage and service during a storm event. Include Analog, satellite in addition to wireless Cellular. Install repeaters and secure to ensure maximum effectiveness. Investigate the practicality and use of satellite electronic management systems that are often used by media in storm affected areas
- x. Establish comprehensive list with key contact phone numbers to include at a minimum:
 - 1. Staff
 - 2. State Association
 - 3. General Contractor
 - 4. Electrician
 - 5. Home Health Personnel
 - 6. Roofing Contractor
 - 7. Insurance adjuster
 - 8. Fuel Source
 - 9. Oxygen supplier
 - 10. Purchasing group
 - 11. Media contacts.
- xi. Record message on primary phone system that explains evacuation details and community status. This should be accomplished early and not when it is needed to ensure that calm is conveyed.

11. Supplies

- i. Along with routine supplies ensure that the following are on the list of must haves: Fans, Flash lights, lanterns, batteries, fiber optic light sticks, oxygen and portable concentrators, Battery operated radios and televisions, cots, egg crate mattresses, linens, folding chairs, food, water, ice and first aid kits. See comprehensive list of supplies for recommendations.
- ii. Alternate source for nursing supplies when supplies run low or residents forget their medications. Establish protocol with pharmacy and Medical Director for such needs. Identify back up plan for Lab, X-ray, therapy and other diagnostic related services should the routine providers be unavailable.
- iii. Coordinate supply lists with purchasing agent and provide direction as to what and where supplies are to be delivered.

1. ***Once the storm has passed, evaluate the community for habitation using the support of the general contractor, structural engineer and restoration company. Commence with activities to ensure safe and comfortable re-entry:***
 - i. Evaluate status of roofing and building structure.
 - ii. Check that all elevators are properly working on the generators.
 - iii. Prevent water from further penetrating building by securing roofing and windows if possible.
 - iv. Evacuate water to prevent mildew.
 - v. Assess status of water. Boil if ordered.
 - vi. Where there is no electricity, ensure generators are in good working order. Log in fuel consumption and monitor fuel resources for enduring power outage. Seek additional fuel resources where possible.
 - vii. Commence with debris removal, tree trimming and other activities to ensure safe entry to the community.
 - viii. Evaluate the status of sewage management and address with the resources needed.
 - ix. Establish plans for emergency power to come back on so that systems cycle on and do not overload with the restored power.
2. ***Once the general contractor/structural engineer provides the 'all clear' for re-entry, notify the State authorities to inspect and clear the community for mold issues and sound structural integrity.***
3. ***Once the residents re-enter the community, ensure their safety by facilitating the following:***
 - i. Force fluids to prevent dehydration.
 - ii. Clean out refrigerators to ensure residents do not consume spoiled food.
 - iii. Establish cool common place where fans are used to help with comfort.

- iv. Monitor Health Care resident temperatures and ambient temperatures with the prevention of hyperthermia the key objective.
- v. Resume food service as soon as practical.
- vi. Conduct room and apartment rounds to ensure fire watches are in place if emergency systems are compromised; check resident body temperatures; check on medication status and on re-order needs; force fluids; check skin for the more compromised residents; open windows and assess room/unit temperatures; check on overall medical conditions; Ensure availability of water; ensure proper toilet flushing techniques; ensure the availability of incontinent supplies and other hygiene needs; remove spoiled food from refrigerators; assess psycho-social needs.
- vii. Provide Activities' program to ensure that the residents are engaged in productive and meaningful events that help to occupy their time in a stress-relieving manner.

4. ***Post storm Employees who are scheduled to work focus on clean up efforts, while employees who facilitated the evacuation return home. Keep in mind the following where employees are concerned:***

- i. Adjust employee schedules to accommodate their needs to address personal losses such as housing damage.
- ii. Relax uniform standards. Assist with laundry where possible.
- iii. Assist with meals and force fluids to avoid dehydration.
- iv. Ensure paychecks continue and in cash if need be. Employees should log in their hours worked and identify what tasks they performed. Supervisors should verify the accuracy of time and tasks.
- v. Assist employees to access FEMA, State Health Care and Red Cross support where needed.
- vi. Try to establish an employee relief fund with resident support.

- vii. Plan recognition activities and acknowledge staff contributions. Further acknowledge resident patience and understanding over the inconveniences they experienced.

5. *Post storm communication and physical plant follow up should include the following:*

- i. The LCS corporate risk manager and insurance company adjuster should be on-site as soon as practicable following the storm to document the damage in a comprehensive manner in a way that ensures maximization of claim/damage recovery. The General Contractor/structural engineer should be on hand to address questions as they arise.

- ii. Department Directors should be given disposable cameras to photograph damage as they observe it. They should be instructed to document their observations.

- iii. Identify Capital improvements for physical plant structural failures. For example: Note that gable trusses, mechanically fastened single-ply roofs, ballasted roofing and roofing shingles are no longer recommended, but the 5 ply roofing and standing seam proved effective during the last storm event.

Other physical plant improvements might be: increased generator capacity, additional fuel storage containers, rooftop A/C fasteners, impact glass windows, water storage containers, retrofitting of sky lights with impact resistant glass, etc.

- iv. Media management and prepared public service announcements should be coordinated to maximize the positive elements of the emergency and reflect the community in the most favorable light.

- v. There should be a staff evaluation of the event and the state approved emergency plan should be updated to reflect what worked effectively in the plan and also adjust procedures for the elements that did not work so well.

- vi. Document all items destroyed and discarded. Protect items that can be salvaged.

Doyle, Dan

From: on behalf of AfterIreneCT

To: Breiner, Kirstin

Subject: RE: Emergency Management perspectives following Hurricane Irene

Good Afternoon Taylor,

Again, let me thank you for your support at StoneRidge during the hurricane Irene emergency planning. I continue to be most appreciative of your leadership and I know that you made a difference and truly cared for our residents during this troubling situation. As I reflect back on the circumstance I wanted to recap for you the critical issues of this storm event and highlight for you my perspective on what needs to change in Connecticut to avoid disaster in the future. Life Care Services owns and/or manages 5 retirement communities in Connecticut and I would appreciate your support in bringing emergency management solutions to the highest level of effectiveness.

I. From a planning point of view, A Senior Living Community that we own and manage, StoneRidge...located in Mystic, Connecticut, is directed to plan with the following assumptions in mind (See specific Details in the attached document):

1. Critical resource plans and supply lists must endure beyond 72 hours. Most supplies and resources will be inaccessible locally; therefore resource acquisition shall be obtained through a group purchasing entity who may act as the liaison for supply orders outside the disaster affected area.
2. Power and water restoration as well as routine resources such as fuel will be unavailable at times and often for extended periods, generally up to 10 days.
3. The development of resource relationships with corresponding communication strategies must occur early, 6-8 months prior to the commencement of the June 1 – November 31 emergency weather 'season'.
4. Evacuation orders are earlier and for longer duration than previously experienced. Plans should be in place for alternate living arrangements should the community be uninhabitable post storm event.
5. Be prepared for good state approved emergency plans to fail and have back up plans established. Resources must focus on survival in the most unimaginable of situations and back up plans are essential as planned service commitments fail.
6. There are not enough Skilled Nursing Facility beds generally speaking to always transfer Health Care residents to a like facility, so creative solutions must be identified to triage Skilled Nursing Facility residents in alternate physical locations.
7. 911 and other emergency services will be suspended and thus only life threatening situations will be addressed by the local hospitals. Emergency management plans will be required to address critical patient care needs absent the use of hospital emergency rooms. Local Lab, X-ray and other contracted support services will likely be affected by

9/23/2011

the storm event, so back up resources will be needed.

8. Staff members will be affected by the storm event, so plans should be made for back up staffing requirements from outside the affected area.
9. The communication infrastructure may be obliterated, so emergency communication processes should be explored for alternate ways to communicate. Expect phones, cell phones, E-Communications, and electricity to not work, thus alternate communication plans must be established so as to effectively let family members know the status of their loved ones, facilitate supply and resource needs and manage emergency issues that arise.
10. Temperatures may be extreme, so efforts to prevent dehydration, ensure skin integrity and prevent hyperthermia or hypothermia are measures to be assessed and addressed as needed.
11. Water will be contaminated and so emergency drinking water must be on hand, plumbing issues must be managed and non-potable sources identified.
12. Cash will likely be the only resource to pay for supplies in the local affected area. Credit cards will not always be accepted.
13. Safety and security provisions should be considered because desperate people will take desperate measures to survive and increased crime may be expected.
14. Fire and emergency electronic systems may not function, so assume the need to manage fire watches which are labor intensive.

II. The State of Connecticut should improve the support of its residents during emergency situations and planning should be designed to protect and preserve human life. To be effective at driving solutions to the emergency planning efforts the State should:

1. Recognize that temperate weather during Hurricane Irene was the only reason that disaster was avoided. Extreme weather conditions, heat or cold, may put all aged residents at potentially grave risk.
2. Recognize that CL & P did not prioritize power to the most vulnerable population of the community (care facilities). The majority of power in the surrounding area was restored well before StoneRidge (A continuing Care, skilled nursing and memory care facility). This was a small hurricane, but resulted in 6 days without power. Connecticut must plan for community emergencies and have a strategy in place that is directed at ensuring the safety of the residents of the community.
3. Improve emergency management agencies, the Utility Commission and CP&L's responsiveness to emergencies and develop comprehensive plans for managing emergencies in the future. Local emergency management did not appear to have any plans communicated to StoneRidge, nor did they have any intention of assisting us with potential evacuation needs. There were no emergency shelters established for support with Oxygen dependent residents or clinically compromised needs. Had weather been an issue, and had local resources (communication, generator fuel, gas, Emergency Rooms, medication, food, water) been obliterated, external resources would have been required to either support sheltering in place or moving more than 300 elderly senior residents to a safe

location. While we plan for this in our emergency strategy outlined in the attached document, the least that emergency management authorities and CL & P can do is communicate effectively with us so that evacuation strategies may be executed effectively, safely and timely. Moving this many elderly residents and clinically compromised people is highly risky in the best of circumstances, but the effort should be coordinated with the local authorities to ensure a safe process. The best plans fail and local authorities should plan to support its residents when their plans are failing. If this is not the intent, then all the residents of the local community should be told, 'to not count on ANY support' from the local authorities.

4. Develop a comprehensive communication strategy. Information shared between the Selectman, CL & P and utility commission was not accurate and was not fluid, therefore we could not depend on any information for executing our emergency planning effectively. We felt as though we were being managed from a public relations perspective rather than being supported as we tried to manage the decision making situation with our own resources. We received the most contradictory information in all communication attempts. At a minimum, Connecticut should enhance communication and have a plan for it. Upon contact with Senator Maynard's office we finally began to receive decent information. I praise the Senator's Assistant, Taylor, for his diligence and perseverance, as well as his effective intervention and follow up.

III. There are many people in the community willing to be a part of the emergency management solution, including owners and leaders of StoneRidge. I suggest that a community advocacy group be formed to support resolution in the emergency planning and execution efforts.

1. Reach out to states such as Florida and Louisiana to ascertain what they do to plan for and manage hurricane emergencies. In Florida, for example, there is an annual Governor's hurricane planning conference that brings the stake holders together to build on quality planning year over year (<http://www.flghc.org/>). These States have become the experts at leading support and recovery efforts because they have been through many tragedies such as hurricanes Katrina in 2005 and Andrew in 1992, as well as countless other hurricane events. I personally participated in the evacuation of and sheltering in place of numerous retirement communities managed by Life Care Services in both of those storms, as well as many others since 1992. To our credit we have managed these situations with 0 deaths/injuries. But, we did not do this in a vacuum, we had the support of excellent employees, the management company, local emergency management, the state agency for health care, a purchasing group, a construction company, the Florida Association of Homes/Services for the Aging, Louisiana Homes for the Aging, the American Association of Homes/Services for the aging (now 'Leading Age'), Fire/police, media, insurance companies and many others too many to name. The point is that the resolution efforts needed in Connecticut must include the coordination of many stakeholders so that the outcome results in comprehensive planning that is designed to protect and preserve life in emergency situations.
2. Looking at the State of Florida specifically: They require care communities to submit their emergency plans and evacuation strategies and have them approved annually as part of the survey/inspection process; there is a strong working relationship between local emergency management organizations and the care facilities, There are mandatory evacuation guidelines that are State driven; there are transportation guidelines; shelter sites are opened when evacuations are ordered or when power is out for an extended period; there are special clinical