

**Testimony
of
UIL Holdings Corporation
Re:
Raised Bill No. 426 - AN ACT CONCERNING GEOGRAPHIC INFORMATION
SYSTEMS DATA SHARING.**

**Legislative Office Building
March 21, 2012**

Good afternoon, Senator Slossberg, Representative Morin and members of the Government Administration and Elections Committee. My name is Joseph Thomas and I am the Vice President – Electric System Operations and Client Fulfillment of The United Illuminating Company. I want to thank you for this opportunity to provide testimony on **Raised Bill No. 426, AN ACT CONCERNING GEOGRAPHIC INFORMATION SYSTEMS DATA SHARING.**

- UI supports the sharing of GIS certain information to supplement planning and response.
- The Company cannot determine at this time if we will be able to comply with the bill's January 2013 timeline. The bill has language requiring certain data that has yet to be defined and may also be defined by other parties without the guidance and/or involvement of the utility.
- UI believes that it is important to determine how our municipal partners will use the information and how they will keep it secure from disclosure. The bill does specify that the information will be submitted in a confidential manner. However, we are all cognizant that not all confidential data will remain so. Security of the data should be included in the bill concurrently with requiring the Company to share the data. The

Company's Municipal Liaison process is the most effective and efficient method for our municipal partners to receive real-time, accurate electric system information and status.

- UI would support an investigation of a more real-time information sharing process such as the UICDS (Unified Incident Command and Decision Support) system being developed by the US Department of Homeland Security

As mentioned before the current language of the bill does not specifically define how the information is to be used or kept secure. Also, the bill does not define all of the specific data to be shared. The bill does mention certain data that may or may not be within our GIS (Geographic Information System) as well as leaving the data that can be requested unlimited. For example, the UP's GIS system does not contain easement information. This information is contained in a separate system and conversion of the information into GIS would entail a lengthy and expensive data conversion project. The information contained in our record systems, if used incorrectly could lead to unsafe results, namely the path of high voltage lines, and misinterpretations and assumptions by those not educated in power system operations could lead to dangerous decisions by our municipal partners and employees thereof.

For example, if a municipal employee directs town crews to downed wires that they believe are safe to handle based on misinterpreting circuit maps could put those crews in harm's way.

Further, having possession of the information is only one side of the operational requirements for understanding the state of the electric system. The other side of the equation is the real time situational information (GIS Information) in our Emergency Operations Center as to the actual

status of the electric system. Our crews in the field rely both on the static map information as well as a direct communications link with the UI Emergency Operations Center. Without these two components no work can be performed safely on the electric system.

Providing of GIS data to municipalities could be of benefit as I stated in the opening paragraph. However, defining the use and security of the information first; is a prudent step prior to the sharing of any data. During a storm situation the state of the system changes as the event unfolds and restoration is underway. The most reliable way to obtain system information is through the UI Municipal Liaisons stationed at each and every one of the municipal emergency operations centers activated for a given event. These are trained individuals whom the Company equips with access to key systems such as GIS and OMS during an event and have a communication link to the UI Emergency Operations Center. Through the Liaison a municipality will obtain the most current system information. Relying on data shared on a quarterly basis (as proposed in this bill) will not provide the most up to date and accurate information. Due to our capital construction and maintenance programs the distribution system changes on a daily basis. As a result of the constant changes to the electric system, we believe legislation related to the development of a more real-time data sharing process should be investigated. One such system dedicated to this end is the UICDS (Unified Incident Command and Decision Support system) being developed by the U.S. Department of Homeland Security that is dedicated to bringing multiple data sources together onto a common platform. A white paper on the system is available at <http://www.ujcds.us/files/UICDS%20White%20Paper.pdf>.

As a note, UI regularly provides up to date system information for non-emergency event planning purposes to entities such as the DOT when requested. This method has historically been very effective and does not require the sharing of GIS information.

Also, as mentioned earlier, the process and systems for ensuring the security of this information needs to be developed prior to sharing any information. A proliferation of this data, outside of the control of the utilities protective systems, could lead to this information being used to determine specific outage locations in order to perform criminal activities or operation of critical switching devices located within the GIS data in order to intentionally disrupt the electric delivery system. Sharing of this information to potentially many dozens of towns increases this likelihood.

Further, it is also unclear in the legislation how PURA will manage receipt, storage, security and sharing of town or region specific information. To undertake this responsibility would require a GIS system and administrator capable of parsing the data for the various towns or regions; which is not a trivial undertaking.

In conclusion, UI suggests this Committee to collaborate with the Energy & Technology Committee to establish of a working group comprised of municipalities, State agencies, utilities and PURA to address the issues defined in this testimony. Additionally, the working group could develop operating procedures to ensure the safe and secure use of the information. Finally, the legislation should require the investigation of real-time data feeds to a UICDS system.

Again, thank you for the opportunity to offer testimony on **Bill 426 AN ACT CONCERNING GEOGRAPHIC INFORMATION SYSTEMS DATA SHARING**. I'll try to answer any questions you may have.