



Municipal Offices
1070 Route 202/31
Ringoes, NJ 08551-1051
(908) 782-8536
Fax (908) 782-1967

August 31, 2020

President Joseph L. Fiordaliso
Commissioner Mary-Anna Holden
Commissioner Dianne Solomon
Commissioner Upendra J. Chivukula
Commissioner Bob Gordon
State of New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton, NJ 08625

**Re: JCP&L's Performance in East Amwell Township in the Recent
State-Wide Power Outage**

Dear President Fiordaliso and Commissioners Holden, Solomon, Chivukula and Gordon:

I am Richard Wolfe, the Mayor of East Amwell Township. East Amwell is a rural municipality in Hunterdon County, with a population of approximately 4,000 people.

I am writing this letter to the Board of Public Utilities (the "BPU") for three reasons. First, I want to share with the BPU my observations, as Mayor of East Amwell, regarding JCP&L's performance in restoring power to the residents of East Amwell following the major power outage that occurred on August 4th as a result of Hurricane Isaias ("Isaias"). As discussed in detail below, JCP&L's performance was very poor in several key respects, thereby needlessly causing a host of problems for the residents of East Amwell.

Second, I want to make a few suggestions regarding how I believe JCP&L could, without having to move mountains, improve its performance in East Amwell when a major power outage impacts all or a significant portion of JCP&L's service area in New Jersey.

Finally, I want to explain why a prolonged power outage affects the residents of East Amwell more extensively than residents of urban and large suburban communities.

Before discussing each of these topics in detail, I will provide some background regarding impact of the Isaias power outage on East Amwell.

According to JCP&L, approximately 87% of the households in East Amwell lost power as a result of Isaias. If you exclude the residents who lost power for a relatively short period during the storm, I believe the percentage of residents who lost power was less than 87%, but was nonetheless a significant percentage of the residents in East Amwell.

It took JCP&L seven days to restore power to all East Amwell residents. Based on JCP&L's restoration updates, most of our households were without power for over two days, and a significant percentage were without power for at least four days.

I spent many hours during the power outage dealing with (i) resident requests for accurate information, (ii) resident complaints regarding JCP&L, and (iii) issues pertaining to clearing our roads. Additionally, I communicated frequently with the representative at JCP&L who serves as the contact person for the Mayor of East Amwell (the "JCP&L Representative").

Although I did not keep a log, I estimate that I corresponded by email and/or spoke by telephone with between 80-100 East Amwell residents during the six days following Isaias, from early morning until well into the night. I also read numerous comments that our residents posted on social media during that period.

Thus, I was very much in the trenches in East Amwell regarding the power outage caused by Isaias and believe I am able to accurately discuss JCP&L's performance.

In the remainder of this letter I will discuss the three topics I mentioned at the beginning of this letter. I am not going to attempt to address all the problems JCP&L may have throughout its service area in New Jersey. I am not qualified to do that. Rather, I simply want to address the problems I have personally observed impacting the residents of East Amwell.

PART 1: MY OBSERVATIONS REGARDING JCP&L'S PERFORMANCE

In this Part 1, I will discuss my observations regarding (i) the length of the power outage, (ii) the inaccurate information JCP&L provided to me and the residents of East Amwell during the power outage, and (iii) JCP&L's failure to timely de-energize downed power lines.

LENGTH OF THE OUTAGE IN EAST AMWELL

JCP&L was very disorganized in its handling of virtually all aspects the restoration of power in East Amwell in the days following Isaias. This disorganization invariably led to significantly delays in restoring power to the residents of East Amwell.

For example, the starting point for fixing a problem is identifying in the problem. JCP&L was not able to do that. Its outage information was remarkably inaccurate. Neighborhoods that had power were shown of JCP&L's outage map and on the JCP&L Representative's list, as not having power. Conversely, neighborhoods that were without power

were shown as having no problems. Efforts on my part to correct these errors with the JCP&L Representative went nowhere. Indeed, at least two neighborhoods in East Amwell that were without power seemed to have fallen off JCP&L's radar entirely. I finally got the power restored to one of those neighborhoods by physically flagging down a JCP&L truck that, as luck would have it, was being driven by a JCP&L supervisor, and I directed him to that neighborhood.

Additionally, I received multiple reports from residents of JCP&L tree-cutting crews and repair crews sitting idle in their trucks for hours, with those crews telling the residents that the crews were waiting to be dispatched by JCP&L. That is incredibly inefficient, and very frustrating to the residents.

Finally, I personally encountered, and received several reports of, out-of-state repair crews wandering aimlessly in East Amwell Township, trying to find a road or local damage.

JCP&L is trying to deflect the criticism of its disorganization and inefficiency by comparing its restoration time for Isaias to its restoration time for Sandy. Specifically, JCP&L is saying that (i) in Sandy 1.7 million customers in New Jersey were without power, (ii) in Isaias, 1.5 million customers in New Jersey were without power, and (iii) JCP&L's restoration time in Isaias was faster than its restoration time in Sandy.

At least in East Amwell, this comparison is not valid, because Sandy caused far more damage in East Amwell than Isaias did. Based on reports I received from our Department of Public Works and my own observations, the number of downed trees, branches and poles was significantly less in Isaias than in Sandy.

EXTREMELY INACCURATE INFORMATION AND POOR CUSTOMER SERVICE

JCP&L's Grossly Inaccurate On-Line Outage Map. JCP&L's on-line outage map for East Amwell was grossly inaccurate, even days after Isaias. As a result, not only was the map useless to the residents of East Amwell, but it also greatly increased their stress level. For example, not seeing their home or their neighborhood on the outage map, even after they notified JCP&L of their outage, sometimes more than once, led residents to believe that JCP&L was unaware of their outage.

JCP&L's Grossly Inaccurate Communications. JCP&L's email and text communications with the East Amwell residents often were wrong. For example, several hours after Isaias, JCP&L sent a text message to residents in East Amwell stating that JCP&L had restored power throughout the Township -- when in fact it had not. Indeed, at the time JCP&L sent the text message, most of the residents in the Township did not have power.

I promptly notified our JCP&L Representative of this erroneous text. His response, in an email to me, was: "Rick, I did hear that the text messaging feature was not working properly and will report this issue." I asked him to have JCP&L send a corrected text message to our residents. That never happened.

Worse yet, on numerous occasions during the days following Isaias, JCP&L sent text messages to individual residents without power, telling them that their power had been restored, when in fact their power had not been restored. This error greatly increased the stress level and frustration of those residents. Additionally, when the residents reported the error to JCP&L, it made them open a new “work order ticket” with respect to their power outage, only adding to the frustration.

JCP&L’s Unhelpful Customer Service Representatives. I understand that in a major power outage, it may take time to reach a customer service representative.

That said, JCP&L’s customer service representatives were uninformed, gave customers generic or grossly inaccurate, and thus unhelpful, information, and at times were rude to residents. In one instance, the customer service representative hung up on a resident -- a resident that I know from personal experience is a very nice person.

If JCP&L is going to offer its customers access to customer service representatives, it is incumbent on JCP&L to provide those representatives with accurate, up-to-date information, and to train those representatives to be polite and patient with customers. Rude behavior by a customer service representative is unacceptable, even if the customer, who may be very stressed because of the loss of power and lack of useful information, is less than pleasant.

JCP&L’s Grossly Inaccurate Estimated Times of Restoration. The vast majority of the estimated times of restoration (ETRs) that JCP&L provided to East Amwell residents in the days following Isaias were grossly inaccurate, sometimes by days.

Worse yet, the ETRs provided to me during that period by our JCP&L Representative were equally inaccurate. I found that fact both surprising and very disappointing. Indeed, it caused me to question whether there is any benefit to the Mayor of East Amwell of having access to the JCP&L Representative.

DOWNED POWER LINES LEFT UNATTENDED FOR EXTENDED PERIODS

On its website, under the heading Storm Restoration Process, JCP&L says the following:

When an outage is widespread, restoring power to all affected customers at the same time may not be possible, so our crews follow an established protocol to help ensure public safety while returning customers to service as quickly as possible.

In the aftermath of a storm, an initial priority is to find areas with electrical hazards – such as downed (and potentially energized) wires and related electrical equipment – and make them safe. At such times, linemen focus on isolating these hazards. [Underlining added.]

JCP&L did not follow this protocol in Isaias. For example, the morning after Isaias, I received a call from a resident who told me there was a downed power line across her driveway,

she was afraid to leave her home, she did not know whether the line was live and was receiving no help from JCP&L's customer service.

I reported this to our JCP&L representative at 9:01am, who said that he "escalated" the issue.

By late afternoon, JCP&L had not addressed the problem, so I contacted our JCP&L Representative again. At 5:05pm, he sent me an email stating that the problem "was escalated but we have many similar conditions as this one and some more serious, so it may not get done today."

That resident's problem, and a similar problem for another resident, were not addressed until approximately 48 hours after Isaias. And I believe the only reason they were addressed then, and not later, is because I enlisted the assistance of our local Congressman.

Worse yet, another resident informed me there was a live, downed wire in front of her property on Mountain Road for four days following Isaias. Accordingly to the resident, even the JCP&L crew that came to repair that downed wire was astonished.

There were other accounts from East Amwell residents on social media of live, downed wires not being addressed by JCP&L for days.

PART 2: MY SUGGESTIONS FOR IMPROVEMENT

I do not profess to have expertise in managing, from an electric utility's perspective, major power outages. That said, having been very deep in the trenches on the significant power outage in East Amwell resulting from Isaias, I have a few suggestions for improvement I would like to share with the BPU.

OVERALL MANAGEMENT OF AN OUTAGE

My impression is that no one person or small team at JCP&L, familiar with East Amwell Township, was responsible for overseeing the restoration of power in the Township following Isaias. Rather, the restoration process seemed very disorganized and inefficient. Moreover, as Mayor of East Amwell, I felt I had no source of reasonably accurate information regarding JCP&L restoration efforts in East Amwell.

When there is a major outage in East Amwell, I believe that JCP&L should assign a single supervisor, or small team, in either case with significant field experience (i.e., not a "desk jockey"), to oversee and be responsible for the restoration effort. The Mayor of the Township, who typically will be very familiar with the Township and will be in contact with the residents and the Township's road crew and emergency management officer, should have direct access to that supervisor or team, with the understanding that the Mayor will help facilitate the exchange of information and not simply complain and become an impediment.

While I find that having access to the JCP&L Representative is somewhat helpful during normal times and during one-off or minor outages, I derived little or no value from having access to the JCP&L Representative during the major power outage caused by Isaias. In fact, because most of the information I received from the JCP&L Representative, and passed along to the residents, was inaccurate, and generally significantly inaccurate, the JCP&L Representative only increased the stress and frustration of the residents during the days following the Isaias outage.

Our JCP&L Representative was very responsive to my requests for information, and I firmly believe he was well-intentioned and did the best he could with the information he had. However, I also firmly believe that he was not in the trenches, did not have access to accurate information, and did not have the ability to influence the manner in which JCP&L was handling the outage in East Amwell. As a result, he was more of an impediment than a facilitator.

ETRs

When power was finally restored to all the residents of East Amwell, I asked our JCP&L Representative to explain to me how JCP&L determines the ETR for a particular outage. He told me that when a customer reports an outage, the customer receives a “System ETR,” which is a “system estimate . . . based on historical restoration data” and is provided to the customer prior to a crew being dispatched to repair the outage.

In response to follow up questions from me, our JCP&L Representative sent me an email stating the following:

Rick,

Here’s some additional information and clarification about ETR’s.

System ETR’s differs by time of the day of the outage. So if the outage comes in from 8 AM – 4 PM, a system ETR is set at 2.5 hours and if is outside of that time it would be 3 hours. This is the same for all the towns in JCP&L. The basis for the 2.5 and 3 hours is historical restoration data. If the outage is something that would result in a lengthy repair such as an underground fault or pole replacement, the dispatcher will provide a user ETR.

System ETR - Generated during Blue Sky Periods at the time of first call and based on historical restoration statistics.

User ETR - During Storm Operations 'USER' ETRs are applied when the final repair crew is dispatched to provide customers more precise information than the 'GLOBAL' ETR

Global ETR - Estimate of when the majority (95%) of customers are expected to be restored. Can cover an entire Operating Company or

individual districts. Gives public and FE employees an estimated timeline of the event.

Based on the foregoing information, clearly there's a significant defect in the manner in which JCP&L determines ETRs during major power outages. Specifically, JCP&L is using historical data from non-major power outages to compute ETRs during major power outages.

Doing this will invariably lead to customers receiving ETRs from JCP&L that are significantly shorter than the time it actually will take JCP&L to restore those customers. That is exactly what happened in East Amwell during Isaias.

I believe JCP&L would serve its customers in East Amwell far better by, promptly following a major outage in East Amwell, (i) assessing the magnitude of the damage, (ii) developing an estimated Global ETR for East Amwell and (iii) posting on-line a "pecking order" by which JCP&L anticipates restoring the areas in the Township without power. That way, residents in those areas will have some sense, following a major outage, whether they are going to get their power back early in the restoration process or, instead, are at or near the back of the line. The residents can then plan accordingly.

Thereafter, as JCP&L dispatches crews to each outage, and receives from those crews a User ETR, it can notify the affected residents of the User ETR.

For example, if a major storm knocks out power to ten areas in East Amwell:

- i. JCP&L would assess the damage and post on-line a Global ETR for East Amwell.
- ii. As promptly thereafter as practicable, JCP&L would number each outage area from one to ten, with one being the first area JCP&L plans on restoring and ten being the last -- and JCP&L would promptly update that pecking order if it changes.
- iii. Once JCP&L dispatches a supervisor or crew to an outage area and assesses the damage, it would post an ETR for that area. If that ETR changes materially, JCP&L would promptly update the ETR and briefly explain the reason for the change (for example, waiting on a part to be delivered).

DOWNED POWER LINES

JCP&L must do better, significantly better, in de-energizing downed power lines in East Amwell following a major storm. Leaving residents trapped in their homes for days following a storm, and leaving a live power line alongside a well-travelled road for four days, is unacceptable. It is only a matter of time before someone gets electrocuted.

Practically speaking, telling residents to stay away from downed power lines is not a substitute for prompt attention to those lines. First, it does not help those residents who are trapped in their homes. Second, the average person is not going to expect a downed power line to be live days after a storm. Third, JCP&L (and the cable and phone companies) is notorious

for leaving “dead” power lines hanging in place for months after a storm, and thus residents will not necessarily know whether a downed power line is the result of the recent storm. Finally, and perhaps most importantly, in the heavily wooded areas of East Amwell, which typically have winding roads, a person might not see a downed power line until they are upon it.

PART 3: IMPACT OF PROLONGED OUTAGE ON RESIDENTS OF EAST AMWELL

In reviewing the importance of significantly improving JCP&L’s response to a major power outage in East Amwell, it is imperative that JCP&L and the BPU keep in mind certain facts.

First, unlike larger communities in New Jersey that have public water, the residents in East Amwell get their water from wells. Thus, when those residents lose power, they lose their water. Many residents have told me that is the worst part of losing power.

Second, a large percentage of our residents are over the age of 60, many well over 60. Losing power often is harder on them than it is for younger people, particularly when the weather is very hot or very cold. Additionally, downed power lines may prevent our first responders from getting to those residents in a timely manner, which can be particularly problematic in a rural setting, with few roads and long driveways.

Third, East Amwell is an agricultural community, with many farm animals, particularly horses, that need water, lots of water, and also require electricity for other purposes. Thus, you cannot focus on the needs of East Amwell simply by looking at its human population.

Fourth, home generators, often proclaimed by JCP&L as a solution to power outages, are not a panacea. Unless a resident can afford the significant cost of (i) purchasing and having installed a whole-house generator and (ii) running that generator for days, for most residents a generator, which typically is a portable generator, is a solution only for short-term power outages. Not outages lasting several days, a week or more. For example, portable generators often cannot handle a resident’s well pump or their air conditioner.

Finally, a meaningful number of East Amwell residents work in New York City but, because of the long commute to New York City, work from their homes at least one or two days per week. For those residents, losing power adversely impacts their ability to work.

* * *

In conclusion, I recognize that, because East Amwell is a rural area and not densely populated, we are not high on JCP&L’s list for restoration when there is a major power outage impacting a significant portion of New Jersey. I also recognize that nothing I have said in this letter likely is going to change that.

However, I firmly believe that the resources JCP&L devotes to restoring power in East Amwell following a major power outage can, with proper management by JCP&L and careful supervision and strict enforcement by the BPU, be much more efficiently utilized, such

that (i) power will be restored to East Amwell significantly faster and (ii) while the power outage is ongoing, East Amwell residents will receive timely and accurate restoration information.

I also believe that the BPU has to require JCP&L to invest in upgrading its infrastructure in East Amwell, to, for example, (i) build greater redundancy into its power lines, and (ii) provide JCP&L timely and accurate information regarding the location of outages and whether a repair has in fact restored power.

If you have any questions regarding the matters discussed in this letter or would like more information, please feel free to contact me.

Thank you for your attention to this important matter.

Sincerely,

Richard Wolfe

Mayor, East Amwell Township