From: HJR153
Sent: Sunday, August 15, 2004 2:36 PM
To: HJR153
Subject: HJR153 - Tarunbikash Roy

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15 August 2004.

To
SCC
Division of Energy Regulation
P. O. Box 1197,
Richmond, VA 23218

Subject: Burial of Power Lines

Dear Sirs,

The aftermath of Hurricane Isabel, we experienced a general power outage throughout Virginia, and disruption of telephone services to some. Responsibilities for disruptions are with utility companies, about 65% of these disruptions are due to falling trees, and other 35% of disruptions were due to falling branches. Utility companies stopped aggressive tree trimming over last several years, mainly to save money to show profits.

Dominion Resources, State's major supplier of electricity, did not perform these tasks for about four years prior to Isabel. The Chairman and the Board of Dominion Resources stopped its subsidiary Dominion Virginia Power to continue its policy of tree trimmings. Main interest for them is to show extra profits by cutting necessary costs, and to receive extra Bonuses for the Chairman and other top executives. This was a lack of foresight, and eventually cost more money, during the aftermath of Isabel to restore fallen power lines, a good example of Penny-wise but Pound-foolish policy.

In addition, studying burial of Power Lines in Virginia, the SCC should also consider burying Telephone Lines as well. These tasks could be completed simultaneously; costs divided proportionally between two types of Utility providers, and combining these two tasks would together would be economical.

In response to SCC study of burying power lines, I have following comments:

 A main benefit would be avoidance of future incidents similar to the aftermath of Hurricane Isabel, with falling trees and branches causing damages to power lines (and telephone lines). Beside storms, even Lightning strikes to lines and Transformers mounted on utility posts cause disruptions of services. It is a pity we tend not to consider a

long term solutions, in all West European countries and even in some third World countries, burial of power and telephone lines are part of standard practice. Population in these countries rarely face similar power outage, only exceptions are rural areas of third World countries, where there are overhead power and telephone lines. These countries made major investments in the past, now they are enjoying results of the aftermath, and Virginia should consider such practice as a standard as well.

 Costs for such burial of utility lines would be substantial, but this would be an investment towards the future and costs would be paid off over period, through avoidances of extra expenses Utility companies faced during the aftermath of Isabel. Burying these utility lines will need major planning, investment and cooperation between Utility companies, as well as understandings of the communities these companies serve. Some obstacle or opposition of burying these lines could come from very population, these buried underground lines are supposed to serve. Other obstacles would be the utility companies without foresights, reluctant to invest now for a long term benefits. The problems of Domain Issue, proper documentation, digging of yards by owners due to lack of understandings and information that may cause damages to underground lines, and some cases opposition from environmentalists should be pondered ahead.

 A priority list for which lines to bury should be decided by discussions between State, Local Governments and Utility companies, but I may add that in some cases general public from different communities would like to participate. It is possible that some public discussions or some form public hearing would be necessary, before a final decision. Long distance High Tension Power Transmission Lines/Grids are not just simple to bury underground, and these would need some special considerations, may remain as these are now.

 For burial of utility lines the Utility companies must provide all funding, as these entities would be able to recoup all expenses over a period and make profits eventually with future avoidance of all tree trimmings expenses. Possibly Federal Department of Energy could provide some grants, State Government could help Utility companies to issue Tax free Bonds, and both levels of Governments could offer some Tax incentives.

 If the burials of utility lines become a public policy, then this must be a requirement by a State Legislation. To complete such a task a uniform state wide standards and policy would be a requirement, and I believe SCC should play a major role in such a venture to oversee standards. I personally would not like to see involvement of Local Governments, other than expressing their concerns, submission of briefs and initial participations in discussions only, as too many cooks may spoil the broth.

 I would like to see opening of discussions to consider possibility of a nationwide Power Lines/Grids System, covering Continental USA. The scope of such an undertaking would need participation of Federal, State Governments and Utility companies. Such a national Power Grids System could be similar to European Power Grids System already in existence there. I have opportunity to observe and see benefits of such a system, if several countries in Europe are able to participate and cooperate amongst them, why an advanced country like the USA could not implement such a system.

I am submitting my comments in response to the news item in Richmond Times-Dispatch of August 11, 2004.

Yours truly,

Tarun Roy.