STATE OF NEW HAMPSHIRE

BEFORE THE

NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 24-070

REQUEST FOR CHANGE IN DISTRIBUTION RATES

JOINT REBUTTAL TESTIMONY OF

Robert D. Allen

Ian J. Farley

Adam V. Mierzwa

And

Brian Dickie

Vegetation Management
And
Storms

On behalf of Public Service Company of New Hampshire

d/b/a Eversource Energy

March 10, 2025

Table of Contents

I. INTRODUCTION 1

II. RESPONSE TO DOE TESTIMONY 5

III. RESPONSE TO THE OCA'S TESTIMONY 18

IV. CONCLUSION 22

STATE OF NEW HAMPSHIRE

BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

JOINT REBUTTAL TESTIMONY OF ROBERT D. ALLEN, IAN J. FARLEY, BRIAN DICKIE, AND ADAM V. MIERZWA

PETITION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE d/b/a EVERSOURCE ENERGY

REQUEST FOR CHANGE IN DISTRIBUTION RATES

March 10, 2025

Docket No. DE 24-070

I. INTRODUCTION

Robert D. Allen

Q. Mr. Allen, please state your name and business address, by whom are you employed, and in what position.

A. My name is Robert D. Allen. I am employed by Eversource Energy Service Company as Manager of Vegetation Management Coordination, Strategy and Innovation. My business address is 780 N. Commercial Street Manchester, NH 03101. I was appointed to my previous position at Eversource Energy ("Eversource") in August 2013 and was responsible for Vegetation Management on the distribution system for Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH" or the "Company"). From 2009 to 2013, I held the position of Supervisor of Vegetation Management for the Company. From 1992 to 2009, I was an Arborist for The Connecticut Light and Power

Company d/b/a Eversource Energy. Overall, I have approximately 45 years of experience in Arboriculture.

Q. Did you previously submit testimony in this matter?

A. Yes. I submitted prefiled direct testimony on June 11, 2024 regarding vegetation management. My qualifications and background are further described in my direct testimony.

Ian J. Farley

Q. Mr. Farley, please state your name and business address.

A. My name is Ian J. Farley. I am employed by ESC as Manager of Vegetation Management. In that role I provide support to the Company. My business address is 780 N. Commercial Street Manchester, New Hampshire.

Q. Please summarize your educational background.

A. I have a Bachelor of Science degree in Forest Operations Science from the University of Maine, Orono, Maine.

Q. Please summarize your professional experience.

A. Since joining the Company, I have worked for over nine years with the Vegetation Management Group and currently hold the title of Manager, Vegetation Management.

Q. Have you previously testified before the New Hampshire Public Utilities Commission ("Commission")?

A. Yes, I provided testimony in last year's RRA (Docket No. DE 24-035) and PPAM 5 (Docket No. DE 24-094) filings.

Q. Did you previously submit testimony in this matter?

A. No, I did not.

Brian Dickie

Q. Mr. Dickie, please state your name and business address, by whom are you employed, and in what position.

A. My name is Brian Dickie. My business address is 780 North Commercial Street, Manchester, New Hampshire. I am employed by Eversource Energy as Vice President New Hampshire Electric System Operations. In my role, my primary responsibility is management of New Hampshire Transmission and Distribution ("T&D") Grid operations.

Q. Did you previously submit testimony in this matter?

A. Yes. I submitted prefiled direct testimony on June 11, 2024 as part of the Capital Additions Panel. My qualifications and background are further described in my direct testimony.

Adam V. Mierzwa

Q. Mr. Mierzwa, please state your full name, position, and business address.

A. My name is Adam V. Mierzwa. I am employed by ESC as Director-Distribution Engineering. My business address is 780 North Commercial Street, Manchester, New Hampshire.

Q. What are your principal responsibilities in this position?

A. As the Director-Distribution Engineering, I am responsible for optimizing the performance of the distribution system assets in New Hampshire that are operated by the Company and to ensure customer needs for service and reliability are satisfied.

Q. Please summarize your professional experience and educational background.

A. I graduated from Florida Institute of Technology with a Bachelor of Electrical Engineering, and received a Masters of Science in Project Management and Operations from Southern New Hampshire University. From 2014-2022, I worked for Southern Maryland Electric Cooperative (SMECO) in multiple Substation and Distribution Engineering and leadership roles. At SMECO I lead multiple Distribution capital enhancement programs, to include Privatization Project Manager for the Department of the Navy. I was also responsible for the Asset Management and Workflow System. In December 2023, I joined Eversource in the role of Distribution Engineering Director for New Hampshire.

Q. Have you previously testified before the Commission?

A. Yes, I submitted testimony in last year's RRA docket, DE 24-035. In addition, I have previously testified before the Maryland Public Service Commission (PSC).

Q. Did you previously submit testimony in this matter?

A. No, I did not.

Q. What is the purpose of your testimony?

A. The purpose of our testimony is to rebut the arguments made by the Department of Energy in late filed testimony on February 10, 2025 and by the Office of Consumer Advocate on January 24, 2025.

Q. How is your testimony organized?

A. Our testimony is organized into the following sections:

- Section I includes the introduction;
- Section II provides a response to the Department of Energy's Testimony;
- Section III provides a response to the Office of the Consumer Advocate's Testimony
- Section IV is the conclusion.

II. RESPONSE TO DOE TESTIMONY

Q. Please summarize your understanding of the Department of Energy's testimony related to Vegetation Management and Storms.

A. The Department of Energy ("DOE") makes the following recommendations in its testimony related to vegetation management and storms:

(1) The testimony of Dudley, Willoughby, and DeVirgilio agrees with the Company's decision to sunset the enhanced tree trimming ("ETT") program but that the Company's funding remain at $43,000,000.

(1) The testimony of Dudley, Willoughby, and DeVirgilio argues against Company's plan to increase spending for the Vegetation Management plan by $7 million over the next four years and calls into question the effectiveness of PSNH's storm mitigation through the Vegetation Management Plan ("VMP").

(2) The testimony of Dudley, Willoughby, and DeVirgilio argues the Company should not include non-outage events as reported troubles and should only include events involving service interruptions lasting more than five minutes.

(3) The testimony of Dudley, Willoughby, and DeVirgilio argues the Company's storm cost balance should be disallowed and argues the five-year amortization rule will result in rate shock and proposes to book the storm cost balance as a regulatory asset to be amortized over a 15-year period with a carrying charge equal to the 10-year U.S. Treasury rate of 4.5 percent with recovery through the storm reserve adjustment mechanism.

(4) The testimony of Mullinax argues that the proposed vegetation management expense of $43,200,000 should be reduced by $200,000 to $43,000,000.[1]

Q. The Company is proposing to sunset the ETT program, is that correct?

A. Yes. The Company is proposing to sunset the ETT program as described in the Testimony of Robert D. Allen at Bates Pages 2246-2247.

Q. Does the DOE agree that the Company should be sunsetting the ETT program?

A. Yes. DOE agrees that the Company should be sunsetting the ETT program.

Q. What is the Company proposing to do with the additional funds from the ETT program?

A. The Company proposes to reallocate any funding from the ETT program to the Hazard Tree program.

[1] As discussed in the Rebuttal Testimony of Botelho and Lazor, the DOE mistakenly states that the Company's 2023 vegetation management budget was $43,200,000. The correct level of expense for 2023 is $43,434,258.

Q. The Company is proposing to recover costs incurred to respond to Major Storm events that occurred between November 2022 through March 2023 (the "2022-2023 Storm Events") as part of this proceeding. Is that correct?

A. Yes. The Company filed a petition requesting review of its 2022-2023 Storm Event costs that was docketed as DE 24-041. The costs incurred for the 2022-2023 Storm Events are eligible for recovery through the Major Storm Cost Reserve Cost ("MSCR") mechanism pursuant to the storm event criteria established in Docket No. DE 99-099 or pre-staging criteria approved in Docket No. DE 12-320. The review of those costs and associated prudency determination is the subject of Docket No. DE 24-041.

Q. Did the DOE make any recommendation regarding the 2022-2023 Storm Events in its testimony?

A. The DOE repeats its recommendations from DE 24-041 in the direct testimony of Dudley, Willoughby, and DeVirgilio.[2] The Company does not agree with all of DOE's recommendations and is addressing those areas of disagreement in Docket No. DE 24-041. The Company has accepted the DOE Audit Division's limited recommendations set forth in the final audit report issued in Docket No. DE 24-041.

[2] *See* Direct Testimony of Dudley, Willoughby, and DeVirgilio at Bates Pages 73-74. Pursuant to the current procedural schedule for DE 24-041 the DOE will file its brief in Docket DE 24-041 on March 17, 2025 and Eversource will file its sur-reply brief on March 31, 2025. The DOE's testimony in this proceeding reflects the recommendations set forth in DOE's testimony filed on November 22, 2024 in DE 24-041. As stated in DOE's testimony, an order in Docket DE 24-041 is expected in April or May 2025.

Q. Is the DOE making any recommendations with respect to the Company's storm cost recovery framework?

A. Yes, the DOE is proposing to modify the definition of a major storm event that would qualify for recovery through the MSCR mechanism.

Q. Did the Company discuss non-outage events in this proceeding?

A. No. The Testimony of Dudley, Willoughby, and DeVirgilio seem to be confusing the topics discussed in this proceeding by trying to litigate the issues in the Company's storm docket, Docket No. DE 24-041.

Q. Can you please explain what storm costs are currently eligible for recovery through the MSCR mechanism?

A. Under the terms of the MSCR, a qualifying major storm event is defined as a storm that results in either (1) 10% or more of the Company's retail customers being without power in conjunction with more than 200 reported troubles; or (2) more than 300 reported troubles during the major storm event. The MSCR was amended in Docket No. DE 12-320 to allow for recovery of qualifying pre-staging costs. For all impending storms, the Company receives an Energy Event Index ("EEI") forecast from its weather forecast vendor, DTN. The EEI provides highly detailed weather forecasts by region and zone for the Company's service area. DTN's EEI forecast includes all relevant weather metrics needed to determine the likely severity and location of an impending severe storm. Qualifying pre-staging cost are defined as costs incurred in advance of a major weather event where the event had a "high" probability (a probability of greater than 60%) of reaching an EEI Level 3 or higher forecast by the Company's weather service.

Q. The definition of a Major Storm event references the term "troubles." Did the Settlement Agreement approved by the Commission in Docket DE 99-099 that established the MSCR define the term "troubles?"

A. No, it did not. However, the Company has consistently defined troubles to include both outage and non-outage events. The Company's emergency response plan ("ERP") considers number of trouble spots as part of its determination of event level and defines trouble spots to include a location of damage to the electrical infrastructure that requires repair but that may not cause an outage. The ERP states that these troubles spots need to be addressed and provides the following examples: low wire, tree limb on conductor, or damaged equipment.

Q. Can these non-outage trouble spots be deferred for repair until after storm restoration is complete?

A. No. Even though these trouble spots may not cause customer outages they can and do create safety hazards and/or impact the system's reliability. In fact, Fire and Police calls are categorized as non-outage events. Additionally, low wire, momentary, wire in road etc. are classified as non-outage if there is no corresponding customer outage associated with the event. There have been many occasions where a low wire was either caught by a passing vehicle or contacted a member of the public, resulting in a catastrophic event.

As a result, these non-outage trouble spots must be addressed as part of the Company's storm restoration efforts and should be accounted for in the determination of whether an event qualifies as a Major Storm event.

Q. Does the work required to resolve a non-outage trouble different from the work required to resolve an outage trouble event?

A. No. The Company's storm response involves several different categories of crews including line crews and vegetation management crews. These crews respond to both outage and non-outage events.

Q. Are there efficiency benefits associated with responding to both outage and non-outage events as part of the storm restoration process?

A. Yes. When the Company deploys crews to perform restoration work it plans the work to allow crews to work in specific areas by grouping jobs. This can reduce travel time by assigning one crew to respond to several jobs in an area. For example, if there is an outage trouble and a non-outage trouble in the same neighborhood that both require a tree crew the Company will try to assign both trouble events to the same tree crew. This frees up other tree crews to respond to troubles in a different area.

Q. The DOE has proposed that for purposes of classifying a storm as a Major Storm that is eligible for cost recovery through the MSCR mechanism, trouble events should be limited to outage events.[3] Does the DOE provide any justification for its recommendation?

A. The DOE's testimony bases its recommendation on the definitions of troubles that it says apply to cost recovery for other New Hampshire utilities. The DOE states that the definition of troubles used to determine cost recovery eligibility for Liberty Utilities and

[3] See Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates 075-076.

Unitil is limited to customer interruptions and that imposing a similar definition for Eversource would put the three utilities "on essentially the same footing."

Q. Does the Company support this change to the definition of troubles?

A. No. The DOE does not provide any practical basis for its suggestion to change the definition of troubles. The DOE does reference one of the storm events that is included for recovery in Docket DE 24-041; the storm occurred on February 3, 2023 and resulted in 331 troubles. Of the 331 troubles, 165 were non-outage events and 166 were outage events. Consistent with the approved MSCR, this storm is eligible for recovery through the MSCR because it resulted in more than 300 trouble events. As discussed above, the fact that approximately half of the trouble events were non-outage troubles does not decrease the work that was necessary to address those troubles. The Company must dispatch a crew to each of the trouble locations to perform work. For example, the below events are non-outage events that all occurred during the February 3, 2023 event but played a critical role in the storm response:

- Event 4978486 – A broken treetop was swinging over a 3-Phase line. Tree crews were able to remove the line before additional damage was caused.
- Event 4978546 – A trip and reclose on the 313X2J1, which serves 439 customers. Though the event was a trip and reclose, it is important for line crews to patrol the circuit to ensure no additional vegetation can create a sustained outage.

- Event 4978601 – A limb was on the service line, while power was still on at the residence. The lights did flicker for the customer due to the limb, but there was not enough of a grounded fault which would cause the transformer fuse to trip or make additional damage. Line crews went out and removed the limb prior to a sustained outage. This type of scenario is very common during a storm event.
- Event 4980637 – Vegetation fell on communication cable causing it to hang too low. Responding to these events are important to ensure damage does not occur if a truck were to snag the cable.
- Event 4980241 – A fire-police call where a tree was on the line and was blocking the roadway.

This work was necessary, was incremental to the Company's blue-sky operations, and is significant.

Q. What would have been the impact of excluding the February 2023 from recovery through the Company's MSCR?

A. If the February 2023 Storm had been excluded from recovery through the MSCR because it did not satisfy the definition of a Major Storm event, the Company would have to absorb the costs to respond to that event as part of its operating budget. This may not appear to be significant when viewed in the context of all of the events included in the Company's request for recovery in DE 24-041 (i.e., the February 2023 storm resulted in the second lowest total costs for the 2022-2023 Storm Events). However, if the definition of a Major Storm Event is revised to exclude non-outage events from the thresholds, it is possible that

the level of costs required to be absorbed by the company's blue sky operating budget will increase. Over time, these costs could add up and undermine the objective of the MSCR. During the time period associated with the 2022-2023 Storm Events (November 2022 through March 2023), the Company experienced 11 storm events that did not qualify for recovery through the MSCR. In addition, on average Eversource New Hampshire experiences 30 minor storm events per year.

Q. Are there any other problems with the DOE's recommendation to exclude non-outage troubles from the definition of a Major Storm event that is eligible for recovery through the MSCR mechanism?

A. Yes. The DOE's recommendation proposes to revise the definition of troubles by reducing the events that would qualify as troubles but does not propose a corresponding change to the number of trouble events necessary to meet the definition of an eligible Major Storm event. The total number of troubles used as a threshold for the Liberty and Unitil storm cost recovery mechanisms is much lower than the number of troubles for Eversource. For example, according to DOE's testimony, Liberty is authorized to recover costs through its storm fund if it experiences 30 concurrent troubles (interruptions) and 15 percent of customers interrupted or 45 concurrent troubles; Unitil is authorized to recover costs through its storm fund if it experiences just 16 concurrent troubles and 15 percent of customers interrupted or 22 concurrent troubles.[4] Even accounting for the far fewer customers served by these utilities (approximately 6,000 for Liberty Utilities and approximately 77,000 for Unitil versus more than 500,000 for Eversource), these

[4] Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates Page 076.

thresholds are significantly lower than the threshold for Eversource. In addition the New Hampshire Distribution system is utilized to serve not only Unitil but the majority of all customer in New Hampshire via primary metering points across the state. An outage or non-outage on the Company's system not only has an impact on Eversource retail customers but most of the electric customers state-wide. For this reason the Company's distribution system is unlike any of the distribution system for the other utilities in the state. Accordingly, if the definition of troubles were limited to only trouble events that result in an outage (a change the Company does not support for the reasons set forth above), the number of troubles would need to be reduced. If the number of troubles is not reduced, the DOE's stated purpose of placing the three New Hampshire electric utilities on equal footing will not be achieved.

Q. The DOE is also proposing to refine the definition of troubles to include only those customer interruptions that last for more than five minutes.[5] Does the Company agree with this proposal?

A. No, it does not. The DOE supports this recommendation by stating that this clarification would help avoid debate over the meaning of reported troubles and put all three utilities on essentially the same footing. The DOE also argues that this refinement would recognize that recent automated restoration capabilities allow for restoration of power in under five minutes without the dispatch of a repair crew. Both of these justifications are false. First, the definitions of troubles applied to cost recovery for Liberty and Unitil is limited to

[5] Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates Page 077.

interruptions lasting more than five minutes.[6] Therefore, the limitation would be applied only to Eversource and fail to achieve the DOE's stated objective of "equality." Second, it is not accurate that the Company does not have to dispatch a repair crew for outages that last less than five minutes. In fact, every under five-minute outage will have a corresponding non-outage or customer outage where a crew will need to be dispatched. An under five-minute outage does not resolve the issue it only accounts for the customers saved a permanent outage - the underlying issue still has to be repaired and resolved. As stated previously, an under five minute outage does not resolve the condition which caused the issue in the first place. For instance, assume we have an issue on a ROW line between two bulk distribution stations and through remote operations we are able to restore all customers in under five minutes. The condition is not resolved by restoring the customers it is only resolved from a customer impact perspective. The 'condition' still needs to be resolved even though it is now a non-outage in technical terms. A crew must be dispatched to repair the line, a patrol must be performed to ensure no other conditions exist, and the line is then returned to normal. The under five minute outage only applies as it impacts the customer not how it impacts the distribution electrical system.

[6] Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates Page 076.

Q. DOE also justifies its recommendation by stating that revising the definition of troubles would help avoid debate over the meaning of reported troubles.[7] Is the Company aware of any confusion regarding the meaning of reported troubles?

A. No. The Company's MSCR was approved in 2000 and the Company has been filing for recovery consistent with the parameters of that MSCR ever since. Eversource has consistently defined troubles to include both outage and non-outage events in both its ERP and in its determination of MSCR eligibility.[8] Based on the information provided by DOE in its testimony, it is clear that storm cost recovery threshold eligibility has been determined in a different manner for Liberty and Unitil. However, this is not unusual because each utility has unique characteristics and considerations as described above, that were likely considered in the design of their storm cost frameworks. These differences do not apply to Eversource's MSCR; similarly the parameters of Eversource's MSCR do not apply to Liberty or Unitil.

Q. The DOE has proposed a storm metric in its Attachment JED-RDW-JJD-2. The DOE recommends that the Company be required to complete this metric for each storm event it asserts qualifies as a major storm eligible for cost recovery for through the MSCR mechanism. Have you reviewed the DOE's proposed storm metric?

A. Yes, we have.

---

7 Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates Page 077.

8 *See*, *e.g.*, DE 21-089, Audit Report at 2; DE 22-031, Audit Report at 2; and DE 23-051, Audit Report at 1. In each of these Audit Reports the Audit Division noted that it requested clarification regarding the definition of reported troubles and the Company consistently defined reported troubles to include non-outage events. The DOE did not raise any concerns with this definition and the Commission authorized recovery of storm costs in each docket.

Q. The DOE makes this recommendation based on its assertion that the proposed storm metric would foster a more efficient process of comparing weather and system damage in different storms, and also storm restoration costs. Does the Company have any concerns with this recommendation?

A. Yes. The Company does not generally object to including the proposed storm metric as part of its initial filing in future MSCR proceedings subject to further clarification. For example, it is not clear how the DOE defines "historic" as used in the proposed metric. The proposed storm metric should also not be viewed as exhaustive. There may be other relevant data points for a particular storm and therefore, the proposed storm metric would be nothing more than a presentation tool to assist review. However, the storm metric does not take into account several factors such as weather parameters.. Parameters such duration of the storm, lighting, rain amounts, flooding, sustained and mean sustained wind, max wind and mean wind gust, direction of wind, snow amounts, snow type, water content of snow are all basic parameters of weather that have distinct impacts on electric service.

The Company also vehemently rejects the notion that storm costs should be evaluated based on a "comparison" between storms. There is no established baseline for how much storm restoration "should" cost nor is this sort of normalization even possible. Each storm is unique and requires different strategies to prepare, plan and restore power to customer outages within reasonable time frames, and the cost environment may also be dynamic and subject to change based on regional and even national circumstances.

Q. The DOE's final recommendation related to storm costs is that the costs associated with the 2022-2023 Storm Events be amortized over a fifteen year period instead of the five year period proposed by the Company.[9] Does the Company agree with this proposal?

A. No. As addressed in more detail in the Rebuttal Testimony of Botelho and Lazor, the Company's five-year amortization period will not result in rate shock to the ratepayer as the Testimony of Dudley, Willoughby and DeVirgilio proposes. First, the five-year amortization period is modeled after the Company's previous rate case Settlement Agreement in Docket No. DE 19-057. In that proceeding the Company was approved to recover its outstanding storm costs over the five years associated with unrecovered storm costs. Therefore, an amortization period of five years is a typical period for recovery of storm costs and a fifteen-year period is far too long and arbitrary.

III. RESPONSE TO THE OCA'S TESTIMONY

Q. Please summarize your understanding of the Office of the Consumer Advocate's Testimony

A. The Office of the Consumer Advocate makes the following recommendations through the Testimony of Charles J. Underhill related to vegetation management and storms:

(1) Requests approval to increase the vegetation management budget in cost-of-service in order to address trees and limbs that cause troubles during storms; and

(2) To start pre-staging at Level 4 events instead of Level 3 to save about $4.5 million.

[9] Direct Testimony of Dudley, Willoughby, and DeVirgilio, at Bates Page 078.

Q. Do you agree with Office of the Consumer Advocate's assessment that the Company should increase vegetation management by $5.5 million to help manage Enhanced Tree Trimming and Hazard Tree Removal?

A. Yes. The Company needs additional funding for vegetation management to further increase resiliency. As the Testimony of Charles J. Underhill notes, the financial impacts of storm recovery will be significantly impactful on ratepayers for the next several years and it is important to remember that hardening the system is a long-term investment (*see* Testimony of Charles J. Underhill at Bates pages 670-671). Therefore, it is important and necessary for the Company to spend additional funds to ensure the system can maintain reliability during the next several years.

Q. Do you agree with the Office of the Consumer Advocate that the Company should be more proactive in its reliability activities?

A. The Company is employs nine different vegetation management programs in order to continue to proactively bolster the system for upcoming storms. The Company continues to invest and evaluate its programs as much as possible to shorten storm recovery and to further develop and refine their vegetation management program. The Company will continue to explore alternative avenues to increase resiliency and further monitor any potential vegetation threats to the system and address them as much as possible ahead of a major storm.

Q. Why is pre-staging for storms important for the reliability of the distribution electric power system?

A. Pre-staging for storms is crucial for the Company to be prepared for any major storm activity. When a forecasted event is anticipated to cause significant damage that would

necessitate additional response resources, the Company endeavors to have those resources pre-staged prior to event impacts. This strategy allows for the most efficient deployment of resources immediately following the onset of the storm event. For example, when an event is predicted to impact the region, it is necessary to secure resources as soon as possible so the Company has access to line and tree crews when the event impacts New Hampshire. Regional, or even national events can have an impact on the availability of crews before, during and after the event – and consequently, a regional or national event could constrain available resources. Regional weather events that impact neighboring Vermont, Maine and Massachusetts reduce the number of resources available to quickly respond to provide restoration support. Engaging these crews early is critical to providing the restoration customers expect.

Additionally, even when an event is forecasted to only impact New Hampshire, it is essential to engage and onboard crews as soon as possible to avoid a delay in actual storm response. The Company employs resources from all over the region and these crews require the ability to travel to respond to storm events. If the Company was to delay engaging these resources until the weather event is actively impacting New Hampshire, it would be difficult for these crews to travel, especially during snow events, in order to provide assistance with restoration. The crews would need to travel cautiously through the event, which would likely add travel time and additional cost in restoring power during and after the event.

Therefore, it is crucial for the Company to employ resources quickly and efficiently and before the event impacts New Hampshire to have competent personnel pre-staged and ready to respond to these events to work to restore power immediately without delay. Without the ability to have crews pre-staged for major storms, the Company would have limited or delayed access to resources as these crews could be engaged by other utilities in the region or unable to travel as efficiently during the.

While the OCA's testimony provides analysis on when pre-stage wasn't needed, the analysis does not acknowledge the times when it was needed and when crews were on hand to repair storm damage immediately, thereby reducing the time to resolve the storm impact. In addition, the OCA also ignores that the criteria for pre-staging storm staffing is based on past lessons learned from previous storm filings, which demonstrates the benefits of prestaging and engaging crews early, which reduces the cost and time required to restore power.

Q. Do you agree with OCA Witness, Charles J. Underhill's assertion that pre-staging has incurred a significant expense for ratepayers without a demonstratable benefit?

A. Absolutely not. As described above, pre-staging is a vital part of the storm restoration process and accounts for less than one percent of the total revenue requirement in the Company's distribution rate case. Without pre-staging, the Company would be unable to efficiently secure the resources necessary to restore power in an efficient manner. As such pre-staging is a small fraction of the Company's revenue requirement, but provides a substantial benefit for customers.

Q. What is the danger of the Commission disallowing pre-staging from the Company's revenue requirement?

A. The impact of the Commission disallowing pre-staging will have huge consequences on the Company's customers. If the Company's territory is required to wait to face a Level 4 storm or higher which can potentially cause significant damage to the Company's distribution infrastructure, it will take a significant amount of time, effort and cost for the Company to allocate resources to restore the electric power system in any given area. By pre-staging equipment and infrastructure throughout the Company's service territory ahead of a Level 3 storm, the Company is able to act quickly and restore customers' power in an efficient manner.

Q. Does pre-staging consume a large part of the Company's revenue requirement?

A. No. As Mr. Underhill stated, pre-staging amounts to 0.74 percent of the Company's revenue requirement or less than one percent (*see* Testimony of Underhill, at Bates Page 671). For such a small fraction of the Company's revenue requirement, customers can be assured that the Company will be able to restore power faster and more cost effectively than if the Company were not permitted to pre-stage resources.

IV. CONCLUSION

Q. Does this conclude your testimony?

A. Yes, it does.