Appendix 1 - VMP O&M Expenses

_					<u> Аррсііс</u>	11V T - 1	MP O&M	LAPC	11303		
		(a))		(b)				(d)		(f)
		CY 20	015		CY 2015		(c)	(CY2015		CY 2015
		Budge	eted		Actual	F	airpoint	Ne	et Actual	(e)	Actual
Line		Expen		l	Expenses		ntribution			Reference	Variance
1	VMP O&M								.,,		
2	Work Planners for Veg Plan	\$	95,000	Ś	149,589	\$	53,757	Ś	95 832	Appendix 4	
3	Spot Tree Trimming	Ś	40,000	Ś	41,008	Ś	,	Ś		Appendix 4	
	Spot free fillining	,	40,000	ľ	41,000	Y		Ų	41,000	Appendix 4	Budget item is need based. Spend exceeded budget due to increased non
											storm related trouble call volume & includes a portion of CY 2014
4	Trouble and Restoration Maintenance	Ś	40,000	Ś	83,378	\$	_	\$	83.378	Appendix 4	expense paid in CY 2015
		·	-,	Ι΄	,-				,-		Actual CY 2015 expense includes a portion of CY 2014 expense paid in CY
5	Planned Cycle Trimming	\$	702,320	\$	839,591	\$	117,271	\$	722,320	Appendix 4	2015
	,		,	l .	,		•		,	• •	
											Overspend is due to the unpredictable nature of where traffic control will
											be required. Budget is based on average of historical spend and cost per
											unit. Additional tree crews were brought on in the 4th quarter to
6	Police Detail Expenses - Cycle Trimming	Ś	145,362	Ś	227,151	\$	29,072	Ś	198.079	Appendix 4	complete the work plan requiring additional police details.
	, ,		,	l .	,		•		,	• •	
											Additional risk trees with higher probability of failure and resulting
											reliability impact were indentified during the work planning process. A
7	Hazard Tree Removal	\$	350,000	\$	510,445	\$	87,900	\$	422,545	Appendix 4	portion of CY 2014 expense paid in CY 2015 is also included
											Overspend due to three phase patrol on circuits for enhanced reliability on
8	Interim Trimming	\$	65,000	\$	90,623	\$	-	\$	90,623	Appendix 4	CY17 circuits. Used a portion of the right of way clearing underspend
9	Tree Planting	\$	5,000	\$	5,350	\$	-	\$	5,350	Appendix 4	
	Other Police Detail Expenses (Included w/Cycle Trim										
10	Police)	\$	24,600	\$	-	\$	-	\$	-	Appendix 4	This activity was eliminated and include with cycle trim police details
											Original budget was based on work being performed hourly but was
											subsequently paid for as unit cost tree removals resulting in savings/lower
11	Sub-Transmission Right of Way Clearing	\$	105,000	\$	47,050	\$	=	\$	47,050	Appendix 4	than anticipated spend
12	Fairpoint Credits	\$	288,115			\$	288,000	\$1,7	06,184**		
13	Total VMP O&M Expenses	\$ 1	1,860,397	\$	1,994,184	**					
14	Less: Reimbursements from Fairpoint	\$	(288,115)	\$	288,000						
15	VMP O&M Expenses Net of Fairpoint Credits	\$ 1	1,572,282	\$	1,706,184						
16	Total VMP O&M Expenses	\$ 1	1,572,282								

(*) (**)

^(*) From CY 2015 Plan submitted to Staff on November 14, 2014

^(**) Total net veg spend includes \$273,674 of CY2014 VMP year end charges paid in CY2015 adjusted actual net spend for CY2015 VMP is \$1,720,507

Appendix 2 - REP Capital Investments - Summary

		(a)	(b) CY 2015 Capital			(c) CY 2015 Actual	(d) CY 2014 Capital	
Line	Projects	2015 Goal	Investme	nt Budget(*)	С	Capital Investment	Carryover Investment	Reference
1	Bare Conductor	17:	ć	992 500	۲	720 707		Appendix 2 lines 15 17
1	Replacement	1.7 mi.	\$	883,500	\$	738,797		Appendix 3, lines 15-17
	Single Phase Reclosing							
2	Installations	3 Locations	\$	171,000	\$	231,545		Appendix 3, lines 18-21
	Single Phase Trip Saver							
3	Installations	18 Units	\$	85,500	\$	81,450		Appendix 3, lines 22-29
	Calendar Year 2015						•	
4	Totals		\$	1,140,000	\$	1,051,792		
				, ,				
5	Previous CY Carryover		\$	100,000			\$ 269,663	Appendix 3, lines 1-14
6	Totals		\$	1,240,000	\$	1,051,792	\$ 269,663	<u> </u>
7				(*)			\$ 1,321,456	

^(*) From CY 2015 Plan submitted to Staff on November 14, 2014.

Appendix 3 - Reliability Enhancement Program Capital Costs

		App	enaix 3 -	Reliability Enn	ancement Program Ca	apitai Costs			
Line	(a) Activities	(b) Project Description	Funding Project Number	Work Order	(c) CY 2015 Budgeted Capital Investment (107)	(d) CY 2015 Capital Investment Closed to Plant (101/106/108)	(e) CY 2015 Capital Investment Closed to Plant from CY2014 carryover	(f) CY 2015 Total	(g) Estimated Capital Investment to be Booked in CY 2016 (107)
		Replace approximately 0.85 miles of							
	Bare Conductor Replacement Program	· ·	8830-						
1		·	C18603	16809134	\$ -	\$ -	\$ 72,136	\$ 72,136	\$ -
		Replace approximately 0.28 miles of							
		bare conductors along Cemetary Pine							
_	Bare Conductor Replacement Program	·	8830-		_	_			_
2	, , , , , , , , , , , , , , , , , , , ,		C18603	17078097	\$ -	\$ -	\$ 25,400	\$ 25,400	\$ -
	Bare Conductor Replacement Program								
_		5	8830-						
3			C18603	17144884	\$ -	\$ -	\$ 80,372	\$ 80,372	\$ -
		Install Vyper ST with SEL-651R control							
		· ·	8830-						
4	0	11 0	C24073	15711510	\$ -	\$ -	\$ 6,313	\$ 6,313	\$ -
		Install Vyper ST with SEL-651R control							
	_	on Bridge St. Salem NH for single phase							
5	Single Phase Reclosing - 13L3	tripping.	C24073	17145659	\$ -	\$ -	\$ 1,688	\$ 1,688	\$ -
		Install 1 single phase trip saver on							
	•	• •	8830-						
6			C24073	15711564	\$ -	\$ -	\$ 12,162	\$ 12,162	\$ -
		. .	8830-						
7			C24073	16031618	\$ -	\$ -	\$ 7,596	\$ 7,596	\$ -
		Install 1 single phase trip saver on							
		Shannon Rd and install 1 single phase							
	' '	•	8830-						
8			C24073	16031590	\$ -	\$ -	\$ 3,211	\$ 3,211	\$ -
		0 1 1	8830-						
9			C24073	17146026	\$ -	\$ -	\$ 15,877	\$ 15,877	\$ -
	Trip Saver Installations - Mammoth Rd		8830-						
10			C24073	17146064	\$ -	\$ -	\$ 13,800	\$ 13,800	\$ -
	•	. .	8830-						
11			C24073	17146103	\$ -	\$ -	\$ 11,028	\$ 11,028	\$ -
		0 1 1	8830-						
12			C24073	17146148	\$ -	\$ -	\$ 8,228	\$ 8,228	\$ -
		Install 1 single phase trip saver on Pond							
13			C24073	15836509	\$ -	\$ -	\$ 5,510	\$ 5,510	\$ -
		0 1 1	8830-						
14	Walpole - 12L1	Valley Rd Walpole NH	C24073	18000084	\$ -	\$ -	\$ 6,344	\$ 6,344	\$ -
				8830-					
		Replace approximately 1.7 miles of		18000311					
		bare conductors along Bridge St. Salem		8830-		1.			
15	-Bridge St 14L2/14L3	with 477 Spacer Cable.	C18603	18000650	\$ 883,500	\$ -	\$ -	\$ -	

Appendix 3 - Reliability Enhancement Program Capital Costs

	Appendix 3 - Reliability Enhancement Program Capital Costs									
Line	(a) Activities	(b) Project Description	Funding Project Number	Work Order	(c) CY 2015 Budgeted Capital Investment (107)	(d) CY 2015 Capital Investment Closed to Plant (101/106/108)	(e) CY 2015 Capital Investment Closed to Plant from CY2014 carryover	(f) CY 2015 Total	(g) Estimated Capital Investment to be Booked in CY 2016 (107)	
	Bare Conductor Replacement Program	Replace approximately 1.6 miles of bare conductors along Bluff St and Lake St. Salem with 477 Spacer Cable.	8830- C18603	8830- 18001058	\$ -	\$ 546,128	\$ -	\$ 546,128		
17	Bare Conductor Replacement Program -School St 13L3	Replace approximately 0.6 miles of bare conductors along Bluff St and Lake St. Salem with 477 Spacer Cable. Install Vyper ST with SEL651R control	8830- C18603	8830- 18001100	\$ -	\$ 192,669	\$ -	\$ 192,669		
	Recloser Installations Seminary Hill- Rd Single Phase Reclosing 11L1	on Seminary Hill Rd P32 for single- phase tripping.	8830- C24073	8830- 18000156	\$ 57,000	\$ -	\$ -	\$ -		
19	Recloser Installations - Connecticut Valley Rd Single Phase Reclosing - 1L2	phase tripping.	8830- C24073	8830- 16660619	\$ -	\$ 35,540	\$ -	\$ 35,540		
20	Recloser Installations - Windham Rd Single Phase Reclosing - 14L3	tripping.	8830- C24073	8830- 18000157	\$ 57,000	\$ 73,914		\$ 73,914		
	Rockingham Rd Single Phase Reclosing -	0 0	8830-	8830-						
	9L2 Trip Saver Installations -May St Canaan	phase tripping.	C24073	18000158	\$ 57,000	\$ 122,091	\$ -	\$ 122,091		
22	- 7L2	May St Salem NH	8830- C24073	8830- 18000331	\$ 9,500	\$ 10,094	\$ -	\$ 10,094		
	Hanover - 16L1	Rudsboro Rd	8830- C24073	8830- 18000333	\$ 4,750	\$ 5,518	\$ -	\$ 5,518		
	Center Rd Hanover - 16L1	Hanover Center Rd	8830- C24073	8830- 18000334	\$ 14,250	\$ -	\$ -	\$ -		
-	- 13L1	Cove Rd	8830- C24073	8830- 18000339	\$ 4,750	\$ 24,928	\$ -	\$ 24,928		
26	Lebanon - 1L1	Stevens Rd	8830- C24073	8830- 18000340	\$ 14,250	\$ 19,217	\$ -	\$ 19,217		
	Rd Lebanon - 39L2	Poverty Lane Rd	8830- C24073	8830- 18000341	\$ 14,250	\$ -	\$ -	\$ -		
	Plainfield - 39L1		C24073	8830- 18000342	\$ 9,500	\$ 10,591	\$ -	\$ 10,591		
29	Lebanon - 11L1		8830- C24073	8830- 18000343	\$ 14,250	\$ 11,101		\$ 11,101		
	Capital Investment Carryover from previous CY				\$ 100,000					
31	Totals				\$ 1,240,000	\$ 1,051,792	\$ 269,663	\$ 1,321,456	\$ 250,000	

<u>Appendix 4 - Vegetation Management Activities</u> CY 2015

Activities	Program Plan (*)	Reference	
Spot Tree Trimming	As needed	See Appendix 6 for definitions	
Trouble and Restoration Maintenance	As needed	See Appendix 6 for definitions	
Planned Cycle Trimming	175.58 miles	See Appendix 6 for definitions	
Cycle Trimming Police Detail Expenses	As needed	See Appendix 6 for definitions	
Hazard Tree Removal	As needed	See Appendix 6 for definitions	
Enhanced Hazard Tree Removal	As needed	See Appendix 6 for definitions	
Interim Trimming	As needed	See Appendix 6 for definitions	
Tree Planting	As needed	See Appendix 6 for definitions	
Subtransmission Right of Way Clearing	6.3 miles (12.6 miles total - both sides of		
	ROW)/additional as needed from patrols	See Appendix 6 for definitions	
Other Police Detail Expenses	As needed	See Appendix 6 for definitions	
Substation	Feeder	OH Miles - Distribution	OH Miles - Distribution Completed
Mt. Support	16L1	41	41
Slayton Hill	39L1	1.86	1.86
Slayton Hill	39L2	29.83	29.83
Hanover 6	6L3	34.59	34.59
Pelham 14	14L3	37.71	37.71
Spicket River	13L2	30.59	30.59
	Total OH_Miles - Distribution	175.58	175.58
Subtransmission		OH Miles - Subtransmission	OH Miles - Subtransmission
1303/1304 Line Hanover #6 to Lebanon #1	Side Trimming/Hazard Tree Removal	6.3	6.3
	(Combined Edge)	12.6	12.6
	Total OH Miles - Subtransmission	12.6	12.6
	Spot Tree Trimming Trouble and Restoration Maintenance Planned Cycle Trimming Cycle Trimming Police Detail Expenses Hazard Tree Removal Enhanced Hazard Tree Removal Interim Trimming Tree Planting Subtransmission Right of Way Clearing Other Police Detail Expenses Substation Mt. Support Slayton Hill Slayton Hill Hanover 6 Pelham 14 Spicket River Subtransmission	Spot Tree Trimming Trouble and Restoration Maintenance Planned Cycle Trimming Cycle Trimming Cycle Trimming Cycle Trimming Police Detail Expenses Hazard Tree Removal Enhanced Hazard Tree Removal Interim Trimming As needed Interim Trimming As needed Interim Trimming As needed Interim Trimming As needed Subtransmission Right of Way Clearing Other Police Detail Expenses Substation Feeder Mt. Support Slayton Hill Slayton Hill Slayton Hill Hanover 6 Pelham 14 Spicket River Subtransmission Subtransmission Subtransmission Subtransmission Subtransmission Subtransmission Subtransmission Side Trimming/Hazard Tree Removal (Combined Edge)	Spot Tree Trimming Trouble and Restoration Maintenance Planned Cycle Trimming Cyc

Appendix 5 - VMP Spend by Month

Line	Sum of Amount	January	February	March	April	Mav	June	July	August	September	October	November	Docombor	Total	Less Reimbursements from Faripoint	Subtotal
	Hazard Tree Removal	\$49,026	\$8,419	\$10,877	\$8,781	\$45,572	\$33,745	\$35,332	\$14.593	\$15,458	\$50,824	\$72,811	\$165,009	\$510,445	\$87,900	\$422,545
1				- ' '		343,372	355,745	333,332	\$14,353	\$13,436	\$30,624	\$72,011	\$103,009		\$67,500	
2	Interim Trimming	\$12,192	\$9,324	\$47,885	\$21,221									\$90,623	\$0	\$90,623
3	Planned Cycle Trimming	\$201,122		\$7,511	\$1,252	\$83,283	\$68,474	\$63,950	\$64,529	\$73,588	\$90,634	\$58,333	\$126,914	\$839,591	\$117,271	\$839,591
4	Police Detail Expenses - Cycle Trimming & Other	\$41,416	\$636		\$22,424	\$38,750		\$10,356	\$30,546		\$18,230	\$41,819	\$22,974	\$227,151	\$29,072	\$227,151
5	Spot Tree Trimming	\$6,604	\$6,978	\$9,493	\$5,460	\$9,980	\$2,492							\$41,008	\$0	\$41,008
7	Sub-Transmission Right of Way Clearing	\$5,805						\$2,991		\$4,199	\$400	\$800	\$32,856	\$47,050	\$0	\$47,050
8	Tree Planting											\$5,350		\$5,350	\$0	\$5,350
9	Trouble and Restoration Maintenance	\$6,701	\$809	\$1,717	\$6,267	\$7,376	\$11,464	\$12,424	\$3,234	\$7,466	\$8,098	\$14,370	\$3,451	\$83,378	\$0	\$83,378
10	Work Planners for Veg Plan		\$14,461	\$14,253	\$15,176	\$18,855	\$19,131	\$10,242	\$5,193		\$2,135	\$14,673	\$35,471	\$149,589	\$53,757	\$149,589
11	Subtotal	\$322,866	\$40,628	\$91,735	\$80,581	\$203,815	\$135,307	\$135,295	\$118,095	\$100,711	\$170,321	\$208,155	\$386,675	\$1,994,184	\$288,000	\$1,706,184

VMP Definitions

Inspection and Maintenance: The inspection and maintenance component of the REP involves a comprehensive overhead assessment of the Company's equipment and feeders prior to performance of the REP work.

Augmented Tree-Trimming and Clearing: This program involves the removal of hazard trees and limbs beyond what is normally included in tree trimming to reduce the risk of interruptions on the overhead distribution system. In addition to removing dead, dying, and damaged limbs from above the conductor, we also increase overhead clearances to fifteen feet outside of residential areas. This additional work is integrated into routine scheduled trimming program to create a more aggressive approach to removing tree hazards and overhang.

Spot Tree Trimming: This captures all charges for field follow up, review and execution of corrective action required, if any, to mitigate vegetation management concerns requested or reported by a customer.

Trouble and Restoration Maintenance: This captures all charges for response and corrective action to mitigate isolated tree related trouble, overhead line requests to mitigate tree related trouble and storm responses not covered by a storm specific charge number.

Planned Cycle Trimming: This captures all charges for annual fiscal year planned cycle pruning activities but does not include police detail expenses.

Cycle Trimming Police Detail Expenses: This captures all charges for police detail expenses associated with annual planned cycle trim and tree removals.

Tree Hazard Removal: This captures all charges for removal of dead, dying and/or structurally weak trees, limbs and leads.

Enhanced Hazard Tree Removal –EHTM: This captures all charges for the hazard tree removal program directed at improving reliability of on and off cycle poor performing circuits based on removing dead, dying and/or structurally weak trees, limbs and leads on the three phase portions of those targeted circuits using a Customer Served approach beyond each major reliability device point including the lockout section or station breaker to the first reliability device.

Interim Trimming: This captures all charges for mitigation of tree conditions that threaten reliability of one or more sections of primary conductor on a circuit or circuits not contained in the current fiscal year's annual plan of work.

Tree Planting: This captures all charges for tree replacements in exchange for tree removals of full clearance, tree replacement to remediate property owner complaints, trees planted for Arbor Day events.

Sub-transmission Right of Way Clearing: This captures all charges for activities related to cutting, clearing, herbicide application and danger tree removal on substation supply lines up to 46 kV.

Other Police Detail Expenses: This captures charges for all O&M police detail expenses not associated with Planned Cycle Trim.

Appendix 7 - SAIDI/SAIFI 5 year rolling averages

CY	Sum of CI	Sum of CMI	Sum of SAIFI	5-Year Avg. SAIFI (right)	Sum of SAIDI	5-Year Avg. SAIDI (left)
2000	75,896	4,079,729	2.00		107.76	
2001	85,017	8,219,366	2.22		214.39	
2002	65,099	6,042,438	1.68		155.28	
2003	56,341	3,971,111	1.43		100.86	
2004	67,956	8,313,277	1.71	1.81	207.53	157.16
2005	84,188	12,085,278	2.08	1.82	301.25	195.86
2006	106,935	10,363,197	2.70	1.92	263.83	205.75
2007	79,070	9,196,797	1.96	1.98	228.36	220.37
2008	93,197	8,609,475	2.30	2.15	212.05	242.60
2009	47,270	4,763,099	1.17	2.04	115.94	224.29
2010	72,089	8,156,936	1.74	1.97	196.44	203.32
2011	49,176	4,997,759	1.17	1.67	119.60	174.48
2012	69,677	5,829,537	1.70	1.62	140.06	156.82
2013	68,033	6,792,013	1.65	1.49	162.28	146.86
2014	63,878	7,145,798	1.54	1.56	172.12	158.10
2015	24,893	2,618,074	0.58	1.33	61.05	131.02
2016 Projection	55,478	5,470,015	1.33	1.36	130.70	133.24

Appendix 8

Liberty Utilities (Granite State Electric) Corp. Reliability Enhancement Program and Vegetation Management Program Docket No. DE 13-063

I. REP and VMP Commitment

Beginning April 1, 2014 and until the conclusion of Liberty's next distribution rate case, Liberty will continue its Reliability Enhancement Program ("REP") and a Vegetation Management Program ("VMP") (collectively, the "Program"), as set forth below.

II. Definitions of REP and VMP Activities

- a. Activities included in the REP are the following:
 - i. Spacer Cable Expansion/Bare Conductor Replacement
 - ii. Single Phase Recloser Replacement/Expansion
 - iii. Trip Saver Applications

b. Activities and expenses included in the VMP are set forth below:

- i. Spot Tree Trimming;
- ii. Trouble & Restoration Maintenance:
- iii. Planned Cycle Trimming;
- iv. Cycle Trimming Police Details Expenses;
- v. Hazard Tree Removal:
- vi. Interim Trimming;
- vii. Tree Planting;
- viii. Subtransmission Right of Way Clearing; and
- ix. Other Police Detail Expenses.

III. REP and VMP for FY 2014 and Thereafter

- a. Beginning with November 15, 2014, Liberty will provide its REP and VMP plan (the "Plan") to Staff for the following calendar year for Staff's review. Liberty will meet with Staff in technical sessions to discuss the Plan, obtain comments, and answer any questions regarding the plan to be implemented for the subsequent calendar year. After review by Staff, Liberty will take all reasonable steps it deems appropriate to carry out and implement the Plan, taking into account the comments of Staff. Review by Staff of the Plan does not relieve Liberty of its obligation to operate its business and maintain safe, reliable service through expenditures and other capital investments in the ordinary course of business that are not set forth in the Plan, nor does it bind Staff to a particular position regarding the adequacy and/or effectiveness of the Plan.
- b. The Plan shall provide a description of the activities along with targeted expenditures and investments of the proposed Plan to be implemented during the

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following calendar year. The Plan will itemize the proposed activities by general category and provide budgets for both operation and maintenance ("O&M") expenses and capital investments expected from implementation of the Plan. The O&M budget will be \$1,360,000 (the "Base Plan O&M") for the calendar year ("Base Plan O&M Budget"). Liberty may also provide for consideration an alternative Plan with O&M budgets that exceed the O&M Base Amount for the calendar year. Liberty will reconcile actual expenditures and investments with the Base Plan O&M amount of \$1,360,000 and shall be subject to the REP/VMP Adjustment Provision, as set forth in Section IV below. All of the combined expenses will be counted against the Base Plan O&M amount, along with any REP-related O&M that does not relate to a VMP category.

IV. REP/VMP Adjustment Provision

- a. During each calendar year, Liberty shall track all O&M expenses incurred in implementing the components of the REP and VMP Plan. By March 15 of each year, Liberty will make a reconciliation filing with the Commission. To the extent that Liberty, in implementing the Plan, incurs expenses in an amount less than the Base Plan O&M amount, the difference between the Base Plan O&M amount and the amount of expenses actually incurred shall be refunded to customers or credited to customers for future REP/VMP program O&M expenditures, as the Commission determines is appropriate, with interest accruing at the customer deposit rate.
- b. To the extent the Plan submitted for review prior to the calendar year includes a budget higher than the Base Plan O&M Budget and Liberty incurs expenses over the Base Plan O&M amount (consistent with the alternative budget reviewed by Staff), the incremental expense above the Base Plan O&M amount shall be included in rates, subject to Commission approval, through a uniform adjustment factor on a per kilowatt-hour basis and recovered over a twelve month period, commencing for usage on and after May 1, with interest accruing at the customer deposit rate. Any over or under-recoveries at the end of the twelve month period shall be taken into account in the next REP/VMP Adjustment Provision reconciliation period.

V. REP Capital Investment Allowance

The REP capital investment target shall be \$1 million annually. Liberty shall track all capital investments made in accordance with the REP for each calendar year. At the same time that Liberty makes its reconciliation filing for the REP/VMP Adjustment reconciliation, Granite State shall file a report detailing the actual amount of capital investments made in accordance with implementing the REP during the prior calendar year. The report shall include a calculation of the revenue requirement for adding these additional capital investments into rate base, using Liberty's current Commission approved capital structure and debt and equity. Provided that the investments were made in accordance with the REP, Liberty will be allowed, subject to Commission approval, a permanent increase in its base distribution rates to recover the annual revenue requirement for those investments. This permanent REP Capital Investment Allowance

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will take effect for usage on and after May 1, at the same time as any REP/VMP Adjustments are implemented for the preceding calendar year as discussed in Section IV above.

VI. <u>Procedure for Adjusting Base Distribution Rates for the REP Capital Investment Allowance</u>

Base distribution rates shall be increased by the ratio of: (i) the incremental revenue requirement associated with the REP capital investment; and (ii) forecasted base distribution revenue for the prospective year.

VII. Annual Report, Plan Deviations, and SAIDI/SAIFI Results

- a. At the same time Liberty makes its reconciliation and rate adjustment filing (by March 15 of each year), Liberty will file an annual report on the prior calendar year's activities. In implementing the Plans, the circumstances encountered during the year may require reasonable deviations from the original Plans reviewed by Staff. In such cases, Liberty would include an explanation of any deviations in the report. For cost recovery purposes, Liberty has the burden to show that any deviations were due to circumstances out of its reasonable control or, if within its control, were reasonable and prudent. Included in the annual report, Liberty will report its SAIDI and SAIFI results for the prior calendar year.
- b. Liberty shall also report SAIDI/SAIFI results:
 - i. Inclusive of all events identified in items ii, iv and v below;
 - ii. Using the criteria for major storm exclusions set forth by the Commission and IEEE Standard 1366.
 - iii. On a rolling five-year average for each metric in order to minimize the impact of uncontrollable factors;
 - iv. Excluding the effect on performance by supply assets owned by others given the potential impact of transmission on Liberty's reliability performance;
 - v. Excluding planned and notified outages from its calculation of SAIDI and SAIFI, and;
 - vi. Consistent with the Puc 300 rules.
- c. The Commission's definition of a major storm qualifying for exclusion from SAIDI and SAIFI reporting is 30 concurrent troubles and 15% of customers interrupted, or 45 concurrent troubles. (Troubles are defined as interruption events occurring on either primary or secondary lines).

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