

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 16-383

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities
Distribution Service Rate Case

REBUTTAL TESTIMONY

OF

**James G. (Red) Simpson
Business Manager, IBEW Local #326**

February 3, 2017

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is James G. (Red) Simpson. My business address is 707 Turnpike Street, North
4 Andover, MA 01845.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the International Brotherhood of Electrical Workers (“IBEW”) Local
7 326 as Business Manager/Financial Secretary.

8 **Q. On whose behalf are you testifying today?**

9 A. I am testifying on behalf of Liberty Utilities (Granite State Electric) Corp. (“Granite
10 State”).

11 **Q. Have you previously submitted testimony in this proceeding?**

12 A. No. Contemporaneous with this filing is a Petition for Late Intervention.

13 **Q. Please describe your background and professional experience.**

14 A. I have worked in the Utility Industry for 34 years. In the first 20 years of my career I was
15 employed by New England Power Co., Pacific Gas and Electric, U.S. Generating, and
16 Dominion Energy. During that time I served as a Union Steward, Executive Board
17 Member, and Union President/Assistant Business Manager. I have been employed by
18 IBEW Local #326 as Business Manager/Financial Secretary for the past 14 years.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. What is the purpose of your testimony?**

3 A. My testimony is provided in response to the December 16, 2016, testimony filed by
4 Commission Staff witness Al-Azad Iqbal with respect to costs incurred by Granite State
5 for its use of the Training Center located on Broken Bridge Road in Concord, New
6 Hampshire.

7 **Q. Please describe the annual training and certification requirements of workers in the**
8 **electric industry.**

9 A. Upon entering the trade, an apprentice linemen begins a 42 month progression to become
10 a 1st Class Journeymen Linemen. These 42 months consist of three months as an
11 apprentice, 15 months as a 3rd Class Lineman, and 24 months as a 2nd Class Lineman,
12 before becoming a 1st Class Journeymen Linemen. During that 42 month period a great
13 deal of training is required, both practical training and classroom instruction. After
14 reaching 1st Class Lineman, annual training is still required.

15 **Q. Have the training and recertification requirements increased or otherwise changed**
16 **over time?**

17 A. Yes, the training and recertification requirements are constantly changing with the
18 introduction of new equipment technologies, changes in Federal, State, and OSHA
19 regulations, and improvement in best work practices.

1 **Q. How and where was training provided prior to Liberty Utilities' acquisition of**
2 **Granite State in 2012?**

3 A. Prior to the acquisition, all required Linemen Apprentice and Meter Service Training was
4 conducted at the National Grid Training Facility, 449 Southwest Cutoff, Worcester, MA
5 01604.

6 **Q. To your knowledge, is the prior location for training still an available option?**

7 A. No, it is not available due to cost and scheduling issues.

8 **Q. Has the construction and use of a Training Center in New Hampshire benefited the**
9 **members of Local 326? If so, in what ways?**

10 A. The Training Center has provided the following benefits to Local 326 members: ease of
11 scheduling in order to maintain progression schedules; training that is better tailored to
12 equipment that is specific to the system that the employee will be required perform work
13 on; Annual Safety Training; and pride of ownership that comes from having training
14 provided by the Company that the employee works for. All of these factors lead to
15 increased production on the job, quality of work, and increased reliability to the
16 customer.

17 **Q. If the Training Center did not exist, what are the available training alternatives?**

18 A. Alternatives for training would include On the Job Training provided by co-workers, and
19 safety training provided by supervisors, neither of which have been properly educated
20 and trained to provide adequate training.

1 **Q. Are there any disadvantages with those alternatives? If so, please describe those**
2 **disadvantages.**

3 A. Each alternative has its own disadvantages. On the Job Training does not allow for any
4 structure to the training. The employee is trained on work tasks that happen to be on the
5 schedule for that day and, depending on the situation and conditions at the time, the
6 employee may not receive proper or adequate training on that specific task and may not
7 see that specific task again for a long period of time, or, due to scheduling, may not be
8 paired with the same employee that is training him/her. This situation can also create
9 friction within the workforce which will affect safety of the public and the workforce,
10 which would have an adverse effect on productivity and subsequently reliability to the
11 customer.

12 **Q. In your opinion, has Granite State's use of the Training Center improved the access**
13 **to, availability, and quality of the training provided to members of Local 326?**

14 A. Yes, greatly.

15 **Q. Do you have any concluding comments?**

16 A. Yes. The Training Center is vital to providing the necessary training and certification
17 requirements for our members. Without the Training Center, the employees would be
18 left with on the job training to progress and perfect their craft. It is my opinion that this
19 would result in a decrease in production, a decrease in electric system safety and
20 reliability, and both the public and the workers would suffer. Thus, Granite State should
21 be allowed to recover its costs incurred with the use of the Training Center and Staff's
22 recommendation should not be approved.

1 **Q. Does this conclude your testimony?**

2 **A.** Yes, it does.