

Received: January 6, 2017  
Request Number: GSEC 1-13

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000006 – 000007 description of National Grid’s system planning criteria. Please provide a view of National Grid’s key statistics and operating parameters as compared to Granite State. Key statistics and operating parameters to include employees, line contractors, weekly on call compliment, tree crews, mobile transformers, and engineering staff.

**Response:**

I have no knowledge of what the National Grid statistics and operating parameters are therefore cannot provide the requested comparison.

IAI does note that National Grid is responsible for bulk energy supply requirements to LU and has recently improved its reliability requirements just prior to the purchase of Granite State by LU. National Grid retains its responsibilities to ensure a reliable electric bulk energy supply to LU. Also, LU purchased all the National Grid distribution supply assets from National Grid and has access to off system crews in the same manner as National Grid. I therefore infer that the LU ability to provide reliable service to its customers has not materially changed.

Received: January 6, 2017  
Request Number: GSEC 1-29

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000013, lines 11-23. Please provide a view of Eversource's and Unitil's key statistics and operating parameters as compared to Granite State. Key statistics and parameters to include employees, line contractors, weekly on call compliment, spare equipment including transformers, cables, and substation equipment, tree crews, mobile transformers, and engineering staff.

**Response:**

I have no knowledge of what the Eversource and Unitil statistics and operating parameters are, and therefore I cannot provide the requested comparison.

Please also refer to Staff response to LU Data Request to Staff 1-13.

Received: January 6, 2017  
Request Number: GSEC 1-16

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000007, please provide IAI's opinion as to whether the 240 MWH load at risk would ever be triggered given Liberty's geographic disparity and multiple feed-ins.

**Response:**

I have not performed any analysis of the LU system to determine if the 240 MWH load at risk would be triggered and therefore cannot provide the opinion requested. What I do know is that the National Grid load at risk value was recently lowered to 240 MWH from what I believe was a 480 MWH level and that such reduction should at least in theory, generate a more reliable system for LU as projects to meet that criteria would be required sooner.

With regard to Liberty's geographic disparity and multiple feed-ins, they are the same under LU ownership as they were under National Grid ownership when the higher MWH load at risk values were applied.

Received: January 6, 2017  
Request Number: GSEC 1-31

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000015, lines 5 – 8 and Bates 000079, Attachment MDC-9. Given the capital costs of each project and the fact that the projects would be constructed over a period of years, has IAI or Commission Staff estimated the cost to customers on an annual bill basis? If so, please provide the relevant analysis. If not, is the result expected to be excessive? Please explain your answer.

**Response:**

To the best of my knowledge, neither IAI nor Staff has estimated the cost of the seven projects proposed by LU on an annual basis.

Yes, the result would be considered to be excessive when compared to other projects (using \$/dCI and \$/dCMI) that would bring reliability benefits similar or more beneficial to customers. Please also see my response to the LU Data Request to Staff 1-30.

Received: January 6, 2017  
Request Number: GSEC 1-30

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000015, lines 5-9. Please provide the expected outage hours risk mitigation of REP projects versus planning criteria projects

**Response:**

IAI has not performed an analysis of the expected outage hours risk mitigation of REP projects versus planning criteria projects. It is IAI's understanding that LU itself does not use expected outage hours risk mitigation for REP projects but utilizes \$/dCI (dollars per customer interruption saved) and \$/dCMI per customer outage minute prevented on an annual basis. Cost values on this basis were supplied by LU for REP projects in its response to Staff Data Request 8-75 and appears on Bates page 000014, lines 15-17 of my testimony. Cost values on this basis were also supplied by LU for the seven proposed projects justified by its planning criteria in its response to Staff Data Request 11-14, Attachment and appear on Bates page 000015, lines 5-9 of my testimony. These two sets of numbers may be directly compared.

IAI notes that the values for the seven projects justified by the LU planning criteria were based on an estimated future cost of \$7.2 million. Just a few weeks prior, LU had stated that these projects would cost \$19.5 million, approximately three times higher with all things considered equal, IAI concluded that the cost/benefit ratio of these projects was far inferior to that presented by Liobe3rty in its data response based on a total cost of \$ 7.2 million.

Received: January 6, 2017  
Request Number: GSEC 1-41

Date of Response: January 20, 2017  
Witness: Michael D. Cannata, Jr.

---

**Request:**

Reference Bates 000019, lines 2 – 8. Please describe exactly how IAI envisions that Liberty would track the “performance that would have been expected under the minimum vegetation management requirements in Rule 307.10” given that Liberty would be performing cycle trimming under a shorter cycle than the 5-year maximum cycle length provided in the rule. In other words, please explain how hypothetical reliability results from performing vegetation management under hypothetical circumstances would be tracked and reported.

**Response:**

For example, while data would not be pristine, LU could track reliability metrics on circuits that are still on the existing trim cycle as they convert to the new trim cycle. Once the transition is completed, before and after comparisons could be performed on a circuit by circuit basis, using existing and new trim and outage data over at least two trim cycles.