

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

DOCKET DE-16-384

IN THE MATTER OF: UNITIL ENERGY SYSTEMS, INC.

REQUEST FOR CHANGE IN RATES

DIRECT TESTIMONY

OF

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President
Innovative Alternatives

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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your full name.**

3 A. My name is Michael D. Cannata, Jr.

4

5 **Q. By whom are you employed and what is your business address?**

6 A. For this proceeding, I am engaged by Innovative Alternatives, Inc. (IAI) whose business
7 address is 65A Ridge Road, Deerfield, New Hampshire 03037. I am also the president of
8 IAI.

9

10 **Q. In what capacity are you employed?**

11 A. I have been hired by the New Hampshire Public Utilities Commission (NHPUC or
12 Commission) to provide engineering-related services. In this proceeding, I have been
13 requested by Staff to provide a review of energy utility engineering and operations
14 management, practices, and procedures.

15

16 **Q. Please summarize your educational and professional work experience.**

17 A. My educational background, work experience, and major career accomplishments are
18 presented in Exhibit MDC-1.

19

20 **Q. To what professional organizations or industry groups do you belong or have you
21 belonged?**

22 A. I am a member of the Institute of Electrical and Electronic Engineers and its Power
23 Engineering Society, and am a Registered Professional Engineer in the State of New

1 Hampshire (#5618). I served as a member of virtually all of the former New England
2 Power Pool (NEPOOL) Task Forces and Committees except for their executive
3 Committee, where my role was supportive to an Executive Committee member. I also
4 served as a member of the New England/Hydro Quebec DC Interconnection Task Force
5 and the Hydro Quebec Phase Two Advisory Committee. These two groups designed the
6 Hydro Quebec Phase One and Phase Two 450kV DC interconnections with New
7 England. The various committees and groups that I have served on existed to address the
8 functions now being performed by the Independent System Operator – New England
9 (ISO-NE).

10
11 On national issues, I represented Public Service Company of New Hampshire (Now part
12 of Eversource Energy) at the Northeast Power Coordinating Council as its Joint
13 Coordinating Committee member, at the Edison Electric Institute as its System Planning
14 Committee member, and at the Electric Power Research Institute as a member of the
15 Power Systems Planning and Operations Task Force.

16
17 While employed by the of the State of New Hampshire, I managed a professional staff
18 engaged in investigations regarding safety, operations, reliability, emergency planning,
19 and the implementation of public policy in the electric, gas, telecommunications, and
20 water industries. I also served as a full member of the New Hampshire Site Evaluation
21 Committee responsible for siting major energy facilities (Generating stations, gas
22 transmission lines, electric transmission lines, and gas storage facilities). At the request of
23 the Commission Chairman, I sat on the State Emergency Response Commission as a

1 designated member. I was also a member of the former Staff Subcommittee on
2 Engineering of the National Association of Regulatory Utility Commissioners.

3
4 **Q. Have you testified before regulatory bodies before?**

5 A. I have testified before the NHPUC in rate case, condemnation, least cost planning, fuel
6 adjustment, electric industry restructuring, and unit outage review proceedings. I have
7 testified before the Kentucky Public Service Commission and the Maine Public Utilities
8 Commission in transmission siting proceedings, the Maryland Public Service
9 Commission and the Massachusetts Department of Public Utilities with respect to system
10 reliability/storm restoration proceedings, and have submitted testimony at the Federal
11 Energy Regulatory Commission (FERC). I have also testified at the request of the
12 Commission as required before Committees of the New Hampshire Legislature on a
13 variety of matters concerning regulated utilities.

14
15 **II. SUMMARY OF TESTIMONY**

16 **Q. What is the purpose of your testimony in this proceeding?**

17 A. My testimony addresses a multitude of issues. The primary issue that is addressed is the
18 general process by which Unitil Energy Systems, Inc. (UES) budgets its required and
19 discretionary capital projects across its electrical distribution system. Other areas
20 addressed include the specific additional major capital project additions of the new
21 Kingston 115/34.5kV Substation interconnecting with Eversource Energy (Eversource) in
22 the Seacoast operating region to be completed in 2016 and the new Broken Ground
23 115/34.5kV Substation interconnecting with Eversource in the Capital operation region to

1 be completed in 2017. A portion of the Kingston Substation cost is included in the filing
2 as a post-year adjustment to the 2015 test year rate base reflecting plant in service in
3 April 2016. The remainder of the project costs are requested in future step adjustments to
4 rates in subsequent years. The total cost of the Broken Ground Substation is requested
5 through future step increases coinciding with project completion during subsequent
6 calendar years. Another consideration with these two major capital projects is that UES
7 has made the decision to own the interconnections and take delivery at the 115kV voltage
8 level rather than to rely on Eversource for delivery service at the 34.5kv voltage level and
9 paying Eversource delivery service charges.

10
11 UES is also using higher standards than the NHPUC minimum requirements for
12 vegetation management practices as they are promulgated in Puc 307.10 (a) (2). I offer
13 my comments on that subject and the impacts on reliability and system resiliency during
14 major storm events.

15
16 **III. CAPITAL PROJECT BUDGETING PROCESS**

17 **Q. Please discuss the capital spending process at UES.**

18 A. I have reviewed the process used by UES in the funding of both required and
19 discretionary capital projects. Excluding the major capital projects consisting of the new
20 Kingston Substation and Broken Ground Substation projects, I found that UES funds
21 capital projects in a uniform manner consistent across the total New Hampshire corporate
22 entity.

1 **Q. What does consistent across the total corporate entity mean?**

2 A. What I mean is that projects that are not needed to maintain reliability standards or other
3 mandated requirements like safety and environmental considerations are evaluated on a
4 corporate-wide basis. UES is comprised of two separate operating areas. Those are the
5 Seacoast and Capital operating areas. Each project is cost estimated and prioritized on the
6 same basis and then funded to the extent allowed by the total capital budget with
7 consideration of the overall benefits obtained. In other words, both operating areas are
8 treated as a single operating area in the process resulting in an efficient allocation of
9 financial capital across the UES distribution system.

10

11 **Q. What about the process used for major capital projects like the new Kingston and**
12 **Broken Ground Substations?**

13 A. For these larger projects, the need and timing is determined by the application of UES
14 reliability standards requiring that equipment must not be overloaded, voltages must
15 remain within required tolerances, and that load loss over a 24-hour period must not
16 exceed 30MW for specified contingencies. Studies are performed annually for each of the
17 Seacoast and Capital operating areas, testing the system over a 10-year time horizon. A
18 90/10 load forecast¹ is performed and the power system lines and transformers are
19 mathematically simulated. The single contingencies² required to be modeled by the
20 reliability standards are simulated in the model to ensure that the electrical distribution
21 system meets the aforementioned reliability standards throughout the 10-year period.
22 Because the UES system can also experience equipment loading issues with no system

¹ A 90/10 load forecast is one that has only a 10 percent probability to be exceeded when looking at a normal distribution curve. A 50/50 load forecast would therefore have a 50 percent chance of being exceeded.

² Also known as N-1 (system normal with one contingency) testing.

1 elements out of service (N-0 testing), they also perform analyses without contingencies
2 using their extreme peak load forecast which is simply a load forecast that has a
3 probability of exceedence of 4 percent.

4
5 After the electrical distribution system's needs are identified for the future, these
6 identified needs are then monitored annually, go through the planning and approval
7 process, and are budgeted to be in service when required. This process requires that
8 planning and construction of large projects are done over a multi-year period, resulting in
9 corresponding capital expenditures over that expanded time period. Large projects such
10 as the two new 115/34.5kV substations require significant capital expenditures over
11 multi-year periods.

12
13 **IV. NEED FOR NEW KINGSTON SUBSTATION**

14 **Q. Please discuss the system reliability issue that requires construction of the new**
15 **Kingston Substation.**

16 A. The topic of the new Kingston Substation was first discussed in the last UES full rate
17 case, Docket DE 10-055. In that proceeding, UES studies had indicated that the new
18 facility was going to be required to be in-service in 2012 because the existing Eversource
19 transformer at Kingston would reach its maximum Eversource determined normal
20 loading capability without a system contingency at that time.

21
22 The Seacoast operating area is fed by three Eversource sources. The Eversource Great
23 Bay 40 MVA 115/34.5kV Substation feeds the northern area, two Eversource 345/34.5

1 125 MVA transformers at Guinea Road Substation feeds the eastern portion of the
2 system, and a single 40 MVA Eversource 115/34.5kV transformer at the Kingston
3 Substation feeds the western portion of the system.

4
5 The existing Kingston transformer was jointly planned and is jointly used by Eversource
6 and UES so that the joint service area is designed and operated to produce lowest total
7 overall costs to both companies. When the Kingston facility went into service in 1977,
8 the western area of the UES Seacoast system were fed by Eversource sources on the
9 eastern portion of the system and a 34.5kV tie circuit back to the Chester 115/34.5kV
10 Substation in Chester. The new facility at Kingston allowed both the Eversource Chester
11 area and the UES western portion of its Seacoast system to be simultaneously reinforced.
12 Load growth in the Derry area since that time has required that Eversource utilize a larger
13 portion of the available capacity at the Kinston Substation while additional load growth
14 on the UES system in the western portion of its system has also increased. When
15 substation use by company (as determined at peak load periods) changes at the joint use
16 facility, the load based cost sharing agreement is recalibrated. There are no restrictions on
17 either company to utilize the capacity of the joint-owned facility.

18
19 In the 2010 rate case, Staff reviewed the need for a new transformer at Kington in 2012
20 and determined that there were measures that UES could take to defer the need for the
21 facility. By refining its load forecasting process and distributing its load more efficiently
22 among available transformer capacity of all the Eversource sources, UES has deferred the
23 timing for the facility to 2016. In addition to evaluating joint substation alternatives, UES

1 evaluated an alternative that considered owning its own substation rather than owning
2 just its own 34.5kV facilities plus paying Eversource a load-based share of the
3 Eversource facilities. This alternative was ultimately chosen by UES.

4
5 **Q. Did you review the analyses performed by UES to establish the need and timing for**
6 **the new Kingston Substation?**

7 A. Yes, I reviewed each annual analysis performed by UES since the last rate case in the
8 Seacoast operating area. I also reviewed the revised UES load forecasting methodology³
9 and the parameters used in calculating thermal ratings for system components⁴ such as
10 ambient temperatures and conductor temperatures⁵. My review also included a review of
11 the analyses performed by UES regarding the use of alternative supply. I concluded that
12 the studies and analyses were reasonable, sound from an engineering perspective, used
13 reasonable assumptions in its input data, and drew proper conclusions from the results of
14 those analyses. Therefore, I therefore support the UES decision to move forward with this
15 project for completion in 2016 as the proper installation timing for the new Kingston
16 Substation.

17
18 **V. NEED FOR NEW BROKEN GROUND SUBSTATION**

19 **Q. Please discuss the system reliability issue that requires construction of the new**
20 **Broken Ground Substation.**

³ Data Request Staff 8-2, Attachment 2.

⁴ Data Request Staff 8-2, Attachment 3.

⁵ Conductor operating temperature is the allowable temperature that the conductor is allowed to operate at under normal (continuous) conditions, long-time (12-hour summer and 4-hour winter) conditions and short-time (15 minutes) conditions. Generally, no loss of life of the conductor is permitted for continuous operation conditions, while some life loss is accepted for shorter emergency operating conditions.

1 A. The Capital operating area is fed by two Eversource sources. The two Eversource
2 Garvin's Falls Substation 60 MVA 115/34.5kV transformers feeds the southern portion
3 of the Capital operating area in Concord and two Eversource 115/34.5 40 MVA
4 transformers at the Oak Hill Substation in Penacook feeds the Northern portion of the
5 system. The existing transformers were jointly planned and are jointly used by
6 Eversource and UES to produce lowest total overall costs to both companies in this area
7 of New Hampshire. In addition, there was a potential for some additional capacity from
8 an Eversource 34.5kV tie to the Oak Hill 115/34.5kV Substation in Penacook. The
9 facilities allow both the Eversource and the UES systems to be simultaneously
10 reinforced. Load growth in the Concord suburb area has required that Eversource utilize a
11 larger portion of the available capacity at these substations while additional load growth
12 on the UES system has increased as well which has also increases substation loadings.

13
14 In addition, system reconfiguration in the Capital operating area has been required in
15 order to address system restrictions during 115kV outages on the Eversource 115kV
16 transmission system. These restrictions are similar to those that required the split of the
17 UES Seacoast operating area. When use (determined at peak load) changes at the joint
18 facility, the load-based cost sharing agreement is recalibrated. There are no restrictions on
19 either company to utilize the facility.

20
21 According to UES, loss of one of the supply sources to this area of the system would
22 create loadings on the remaining supply sources at a level that is very close to
23 Eversource's pre-determined transformer ratings. This would also create overloading to

1 various sections of UES 34.5kV lines. In addition to evaluating joint substation
2 alternatives, UES considered owning its own substation as an alternative to owning just
3 its own 34.5kV facilities and paying Eversource a load based share of the Eversource
4 facilities. This alternative was ultimately chosen by UES.

5
6 **Q. Did you review the analyses performed by UES to establish the need and timing for
7 the new Broken Ground Substation?**

8 A. Yes, I reviewed each annual analysis performed by UES since the last rate case. As stated
9 above, I also reviewed the revised UES load forecasting methodology and the parameters
10 used in calculating thermal ratings for system components such as ambient temperatures
11 and conductor temperatures. My review also included a review of the analyses performed
12 by UES regarding the use of alternative supply. I concluded that the studies and analyses
13 were reasonable, sound from an engineering perspective, used reasonable assumptions in
14 its input data, and drew proper conclusions from the results of those analyses. Therefore,
15 I support the UES decision to move forward with this project for completion in 2017 as
16 the proper installation timing for the new Broken Ground Substation.

17
18 **VI. UES CHANGES IN APPLICATION OF NHPUC RULE Puc 307.10 (a) (2)**

19 **Q. What are your comments on the changes that UES has made to their vegetation
20 management program practices in contrast to the requirements of Puc 307.10 (a) (2)
21 regarding system reliability and system resiliency during major storm events?**

1 A. UES has reviewed the minimum PUC vegetation management clearing requirements as
2 promulgated in Puc 307.10 (a) (2) and determined that more aggressive vegetative
3 management measures were required to secure the reliability of its distribution system.
4

5 **Q. Please describe what those changes are.**

6 A. In the referenced rules, the Commission requires that as a minimum, utilities under its
7 jurisdiction maintain an 8-foot side clearance to conductors and that mid-cycle trimming
8 be considered. UES has expanded its vegetation management program to include
9 vegetation to a side-depth of 10-feet and has added a mid-cycle vegetation inspection to
10 identify vegetation management issues that may cause interruptions before the next
11 maintenance cycle is started.
12

13 **Q. The changes you describe also involve costs. How do those costs relate to the**
14 **reliability benefits received by customers and system resiliency during major storm**
15 **events?**

16 A. IAI cannot give the Commission a definitive answer to this question. What we do know is
17 that reliability will be improved by these changes, but the amount expended and the
18 cost/benefit ratio is not known at this time.⁶ The same is true for impacts to system
19 resiliency during major storm events. However, IAI is also of the firm belief that tree
20 related outages are the greatest cause of outages during normal system events and a major
21 impediment to restoration of long-term outages due to severe weather related events.

⁶ IAI also notes that Liberty Utilities had also decided that it also needs to use more aggressive vegetation management measures than the NHPUC minimum vegetation management requirements but in a different manner than UES.

1 These benefits are often excluded in the decision calculations regrading vegetation
2 management maintenance programs.

3

4 **Q. What then does IAI recommend?**

5 A. Keeping in mind that Liberty Utilities has also decided to adopt more aggressive, but
6 different than UES vegetation management practices than required by NHPUC rules⁷;
7 IAI cannot give the Commission a definitive answer to this question at this time.

8

9 What IAI does recommend is that UES track the reliability performance of circuits that
10 have been trimmed to the new UES standards on a go-forward basis as compared to the
11 expected performance of NHPUC minimum vegetation management requirements.

12

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

14 A. Yes, it does.

⁷ IAI comments to the Liberty Utilities changes to the vegetation management practices required by Commission Rule Puc 307.10 (a) (2) are included in the testimony in Docket DE 16-383.