

1 **Q. Mr. Gallo, please state your full name and business address.**

2 A. My name is Robert Joseph Gallo, and my business address is 37 Northwest Drive,
3 Plainville, Connecticut 06062.

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

5 A. I am employed by the New England Service Company ("NESC") as Vice President of
6 Engineering. Since Abenaki Water Company ("AWC") has no employees, I am offering
7 this testimony by virtue of the affiliate agreement between NESC and AWC. My costs
8 are in addition to the affiliate agreement and will be charged to AWC at costs plus
9 benefits and overhead.

10 **Q. Please describe your educational background and professional experience.**

11 A. I hold an Associate's Degree in Liberal Arts from Ocean County College, in Toms River,
12 New Jersey. I also hold a Bachelor's Degree in Civil and Environmental Engineering from
13 the University of Vermont, in Burlington, Vermont.

14 Prior to my involvement in the field of engineering, I worked for several years in the
15 field of site and utility construction, where I constructed water, sewer and storm water
16 plant.

17 While in engineering school I worked for the City of Burlington Department of Public
18 Works as an Engineering Technician, where I worked on city-designed projects including
19 inspection of utility installation, water quality testing, roadway inspections, pavement
20 evaluations, and related duties.

21 I then worked for one year at Strand Associates, in Louisville, Kentucky, where I was a
22 construction inspector for the Metropolitan Sewer District. I inspected sewer
23 infrastructure projects, including sewer collection systems, pump stations and force
24 mains. My duties also included inspection of drainage collection and treatment system
25 construction, and site evaluations and enforcement of erosion control measures on
26 project sites.

27 After Strand Associates, I worked for Trudell Consulting Engineers, in Williston,
28 Vermont, for seven years. At Trudell Consulting I was project manager and engineer for
29 the design and permitting of land development projects. My duties included design and
30 modeling of water, sewer and storm water plant. In my role as project manager and
31 engineer, I was responsible for the complete design and permitting of various roadway
32 and land development projects including residential subdivisions, commercial/business
33 office parks, retail and industrial sites. The position also included extensive work with
34 regulatory and permitting entities on the local, State and Federal levels of government.

1 After Trudell Consulting Engineers, I worked for seven and a half years at AI Engineers in
2 Middletown, Connecticut. At the start of my employment at AI, I was a Senior Engineer,
3 and then was later promoted to Associate Vice President, where I ran the daily
4 operations of the company's Civil Engineering and Survey Departments. In addition to
5 providing expertise for utility and roadway design, my duties included project
6 management, marketing and proposal development, budget tracking, preparation of
7 scopes of services and related contracts, client development and relations, and related
8 duties.

9 I joined the New England Service Company in July of 2019, where I am currently the Vice
10 President of Engineering. My duties at NESC include management of all capital
11 improvement projects, regulatory compliance, in-house design of capital projects,
12 system evaluation and recommendations for capital improvements, and related duties.
13 I hold professional engineer certifications in Vermont, Massachusetts, New Hampshire
14 and New York.

15 **Q. Have you previously testified before the New Hampshire Public Utilities Commission**
16 **("NHPUC") or other regulatory bodies?**

17 A. I have not previously testified before the NHPUC. In my previous professional
18 experience, I have testified before the Public Utilities Regulatory Authority (PURA) in
19 Connecticut. I have also presented and testified at planning and zoning hearings, Act
20 250 hearings and court proceedings, in the capacity of an expert witness.

21 **Q: What is the purpose of your testimony?**

22 A: My testimony is to provide support for the proposed White Rock financing, and why it is
23 necessary from an engineering and operations perspective.

24 **Q: Please describe the White Rock System.**

25 A: White Rock, as it is known, is a water system owned by AWC, in the Town of Bow. It has
26 approximately 95 customers. It is served by three bedrock wells, a pumping/treatment
27 facility and two 15,000-gallon buried steel, atmospheric storage tanks. White Rock is a
28 problematic system, and as presently constructed, is not viable over the long term
29 unless significant infrastructure improvements are made. All components of the system
30 plant, including source, storage and distribution, are critically deficient, and need
31 strategically implemented improvements in the context of the currently high rates.

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1 **Q: Please be more specific as to what the problems are at White Rock.**

2 A: Historically, and more frequently in the recent past, White Rock has suffered from
3 numerous low pressure and water conditions caused by woefully inadequate supplies
4 and a leak-prone and fragile distribution system. Together White Rock's three wells can
5 barely produce approximately 17,000 gallons per day, which translates to approximately
6 12 gallons per minute over a 24-hour period. Average demand is about 9,800 gallons
7 per day, which is close to 7 gallons per minute. Given the past history of system leaks, a
8 5-gallon per minute leak, not a large leak for a typical, larger system, would put the
9 White Rock system at a break-even point, which in some cases can lead to water
10 outages. At any one time, there can be several small leaks that can deplete the system
11 of water.

12 In late 2019, Abenaki scheduled a meeting to communicate and discuss the system with
13 residents of Village Shore Estates, where the White Rock system is located, Town
14 officials and a member of the NHPUC. After much discussion, a general plan was
15 outlined, and is the subject of this financing request.

16 **Q: Please describe the distribution system.**

17 A: The distribution system is constructed of PVC and polyethylene piping. At each joint in
18 the polyethylene services, a barbed nylon insert secured by hose clamps was used for
19 joining pipes. Even in the 1970's, about the time the system was constructed, the use of
20 barbed fittings would have been substandard. Exhibit 1 (attached) shows an example of
21 a cracked/broken barbed fitting that was removed from a service connection at White
22 Rock. Exhibit 1 illustrates the conditions present at White Rock, and there is the
23 potential that small leaks are present at these connection points at many properties
24 within the subdivision, robbing the system of needed water.

25 The issue of leaks at White Rock is so pronounced that the unaccounted-for water
26 (UAW) in the system is typically in the range of 40%. All it takes is a 5 gpm leak, or the
27 combination of several small leaks, to arrive at a 40% UAW, which is significant.
28 Therefore, a portion of the funds requested will be to add distribution valving for the
29 benefits described in MR. LaChance's testimony.

30 **Q: What are Abenaki's plans for searching for new supplies?**

31 A: Finding an additional source of water is a priority to provide future, reliable service to
32 the community. Several potential source locations have been suggested from previous
33 investigations of the Village Shore Estates and surrounding properties. Abenaki plans to
34 engage a well driller to begin exploration of a new source once the financing is
35 approved. Finding a new supply is critical, given the precarious nature of the existing
36 well production and the size of the customer base.

1 **Q: What are your plans for maintenance of the existing 15,000-gallon storage tanks?**

2 A: Abenaki plans to line the two tanks when the financing is approved. The tanks were
3 cleaned and inspected in February of 2020, and the results indicated that the tanks were
4 candidates for lining.

5 **Q: Do you have any additional information to offer today?**

6 A: I prepared a narrative describing some of my testimony today, in regards to the
7 distribution, source and storage tank issues. It is included as Exhibit 2.

8 **Q: Does this conclude your testimony?**

9 A: Yes