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STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

April 18, 2014 - 1:35 p.m.
Concord, New Hampshire

NHPUC MAY02'14 PM12:50

RE: DE 14-063
UNITIL ENERGY SYSTEMS, INC.:
Step Adjustment.

PRESENT: Chairman Amy L. Ignatius, Presiding
Commissioner Robert R. Scott
Commissioner Martin P. Honigberg

Sandy Deno, Clerk

APPEARANCES: Reptg. Unutil Energy Systems, Inc.:
Gary Epler, Esq.

Reptg. Residential Ratepayers:
Susan Chamberlin, Esq., Consumer Advocate
Jim Brennan
Office of Consumer Advocate

Reptg. PUC Staff:
Suzanne G. Amidon, Esq.
Thomas C. Frantz, Director/Electric Division
Grant Siwinski, Electric Division

Court Reporter: Steven E. Patnaude, LCR No. 52

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EXHIBIT NO.	D E S C R I P T I O N	PAGE NO.
1	Step Adjustment filing effective May 1, 2014 pursuant to the Settlement Agreement approved in Docket No. DE 10-055	6
2A	Rate Design Calculations Schedule 3 - Revised with OCA SRP Recommendation <i>(Originally marked as Exhibit 2)</i>	6, 13
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P R O C E E D I N G

1
2 CHAIRMAN IGNATIUS: We are here in the
3 case of Unutil Energy Systems' tariff filing requesting a
4 step adjustment for investments in its Reliability
5 Enhancement and Vegetation Management Program and
6 submission of its Plan that we reviewed. On March 4th,
7 2014, Unutil Energy Systems filed its proposed tariffs,
8 and included its report for 2013 Reliability Enhancement
9 Program and Vegetation Management Plan, and the results of
10 its 2013 Storm Resiliency Pilot Program, asking for
11 changes to its rates effective May 1st, 2014. We issued
12 an order on March 19th calling for a hearing this
13 afternoon.

14 So, let's begin first with appearances.

15 MR. EPLER: Good afternoon. Gary Epler,
16 appearing on behalf of Unutil. Thank you.

17 MS. CHAMBERLIN: Good afternoon. Susan
18 Chamberlin, Office of the Consumer Advocate. And, with me
19 today is Jim Brennan.

20 MS. AMIDON: Good afternoon. Suzanne
21 Amidon, for Commission Staff. With me today is Tom
22 Frantz, the Director of the Electric Division, and Grant
23 Siwinski, an Analyst in the Electric Division.

24 CHAIRMAN IGNATIUS: Good afternoon,

1 everyone. What is our plan for presentation of the Plan
2 and discussion of the tariff request?

3 MR. EPLER: Chairman Ignatius, the
4 Company proposes to put four witnesses on as a panel.
5 And, we have several exhibits. And, so, while the panel
6 is getting settled, I can describe what those items are.

7 CHAIRMAN IGNATIUS: All right.

8 MR. EPLER: And, then, I'll have a short
9 direct examination, to walk through a couple of sections
10 of the filing, to provide some explanation and background.

11 CHAIRMAN IGNATIUS: All right. That
12 sounds fine. If you want to bring the witnesses forward.

13 MR. EPLER: Yes. Maybe we should swear
14 the witnesses first, and then I can proceed.

15 CHAIRMAN IGNATIUS: All right.

16 (Whereupon **John Bonazoli, Sara**
17 **Sankowich, Raymond Letourneau,** and
18 **David Chong** were duly sworn by the Court
19 Reporter.)

20 MR. EPLER: The first item that I'd like
21 marked as "Exhibit 1" is the Company's filing and all the
22 attachments to that filing that was made on March 4th,
23 2014.

24 CHAIRMAN IGNATIUS: All right. We'll

1 mark that for identification as "Exhibit 1".

2 (The document, as described, was
3 herewith marked as **Exhibit 1** for
4 identification.)

5 CHAIRMAN IGNATIUS: And, Mr. Epler, just
6 a reminder, in the future, if you can do sequential Bates
7 stamping on these, it really is going to make it easier
8 for our review.

9 MR. EPLER: Yes. I realized that this
10 morning when I looked at it, and I apologize for that.

11 And, the second item, if you look at --
12 I believe, on the desk in front of you, there were three
13 documents. What I'd like marked as "Exhibit Number 2" --
14 or, premarked as "Exhibit Number 2", if you look in the
15 upper right-hand corner, it should say "Schedule 3 -
16 Revised with OCA SRP Recommendation".

17 CHAIRMAN IGNATIUS: And that, everyone
18 has a copy of that? The parties have that?

19 MS. AMIDON: Yes.

20 (Atty. Chamberlin nodding in the
21 affirmative.)

22 CHAIRMAN IGNATIUS: All right. We'll
23 mark that as "Exhibit 2" for identification.

24 (The document, as described, was

1 herewith marked as **Exhibit 2** for
2 identification.)

3 MR. EPLER: And, I'll explain these in a
4 moment. And, then, premarked as "Exhibit 3" would be
5 several pages, and in the upper right-hand corner says
6 "Schedule 4 - Revised with OCA SRP Recommendation".

7 CHAIRMAN IGNATIUS: And, again,
8 everyone's got that?

9 MS. AMIDON: Yes.

10 (Atty. Chamberlin nodding in the
11 affirmative.)

12 CHAIRMAN IGNATIUS: All right. We'll
13 mark that as Exhibit 3.

14 (The document, as described, was
15 herewith marked as **Exhibit 3** for
16 identification.)

17 MR. EPLER: And, then, Exhibit 4 is the
18 color document, two-sided, that would be premarked as
19 "Exhibit Number 4".

20 CHAIRMAN IGNATIUS: And, does it have a
21 first page and a second page?

22 MR. EPLER: Yes. I guess, for
23 convention, let's say that the first page would be the
24 maps.

1 CHAIRMAN IGNATIUS: All right. And,
2 everyone has a copy of that as well?

3 (Atty. Amidon nodding in the
4 affirmative.)

5 CHAIRMAN IGNATIUS: I assume there's no
6 objection to any of these markings?

7 (No verbal response)

8 CHAIRMAN IGNATIUS: All right. We'll
9 mark that for identification as "Exhibit 4".

10 (The document, as described, was
11 herewith marked as **Exhibit 4** for
12 identification.)

13 MR. EPLER: So, if I could explain
14 Exhibit Number 2 and Exhibit Number 3. Pursuant to
15 discussions among the Company, the Staff and the OCA,
16 these two exhibits reflect changes that we're proposing to
17 the Company's filing. And, what these changes are is as
18 follows: In the original Settlement Agreement in Docket
19 DE 10-055, it was, as part of the overall agreement
20 reached, it was agreed that the step increases would be
21 allocated first 115 percent to residential customers, and
22 then on an equal proportion allocation to the rest of the
23 customers. And, this was agreed upon, because there was
24 acknowledgement among the parties that there was a

1 deficiency in revenue collected from the residential
2 class. There wasn't necessarily an agreement as to the
3 magnitude of that, because that depended on how one
4 interpreted the cost of service studies. But there was
5 general consensus that there was a deficiency. And, so,
6 it was agreed that, as the step increases came in, more
7 would be allocated to the residential class to -- as an
8 attempt to begin to address that deficiency over time.

9 Subsequent to the Settlement Agreement,
10 and beginning with the 2012 step increase, we introduced
11 the Storm Resiliency Pilot Program. The first year was
12 approximately 550,000, and the second year we increased
13 that amount, last year we increased that amount by an
14 additional \$880,000.

15 What we've discussed this year and
16 agreed upon is to allocate that, the combined amount, the
17 1.4 million, going forward on an equal proportion basis.
18 And, that's what these Exhibits Number 2 and Number 3
19 represent. And, the reasoning behind that was, in
20 considering the Storm Resiliency Program that was agreed
21 upon subsequent to the original Settlement Agreement, so,
22 the concept is to take that out of that agreed upon
23 allocation and just do it on an equal proportion basis.
24 We're not going back in time, we're not going to

1 reallocate what was collected in 2012 and 2013. But,
2 going forward, we're reallocating this.

3 CMSR. HONIGBERG: A quick question. Are
4 you reallocating everything or just allocating the Storm
5 Resiliency a different way than what you're allocating
6 everything else?

7 MR. EPLER: It's the latter.

8 CMSR. HONIGBERG: Okay.

9 MR. EPLER: We're allocating the Storm
10 Resiliency on an equal proportion basis. The other part
11 of the step increase is allocated according to the
12 Settlement Agreement.

13 CMSR. HONIGBERG: Thank you.

14 MR. EPLER: And, so, that's reflected in
15 these pages. Now, in order to see the magnitude of that
16 change, if you look at Exhibit Number 2, it has two pages.
17 They're both double-sided. And, one says -- the first
18 page says "Schedule 3 - Revised with OCA SRP
19 Recommendation", and that's a two-sided document. And,
20 then, the second says "Schedule 3 - Revised", just
21 "Revised". And, that -- just step back just for a second.
22 There is one other change that's indicated in these
23 documents, a very minor change, based on the Staff audit
24 of the filing. There was a \$56 item that the audit picked

1 up, and we have accounted for that. So, both of these
2 pages have that item in there. That's why they both say
3 "revised". But the top one goes further and has the
4 allocation of the Storm Resiliency Pilot on an equal
5 proportion basis. And, --

6 CHAIRMAN IGNATIUS: Well, I'm sure
7 you'll go through these in more detail, but I'm having
8 trouble understanding. I had assumed that the total
9 numbers on Exhibit 2, the first page, and really the third
10 page, to be able to compare, that the totals would be the
11 same but for that \$56, and it would be the percentage --
12 or maybe I'm missing -- maybe I'm not saying that right.
13 Are there other changes to the program revenues? I expect
14 to see more numbers lining up in it, and I'm not following
15 you right now.

16 MR. EPLER: Okay. If you look at -- if
17 you perhaps were to unstaple the two sheets, so it might
18 be easy to compare the two, and then hold them
19 side-by-side, so that you can see Column (5) from
20 Schedule 3 - Revised, so it has the "Percent Change".

21 CHAIRMAN IGNATIUS: Yes.

22 MR. EPLER: And, then, compare that to
23 Column (8) on Schedule 3 - Revised with OCA SRP
24 Recommendation. And, you see how the percentages are

1 different and the total design revenue is different?

2 That's because the Schedule 3 - Revised with OCA has an
3 allocation based on an equal proportion allocation of the
4 1.4 million from the SRP. So, that's why those -- and,
5 then, if you go down and look at the percentages, the
6 percentages of change is almost equal for all those rate
7 classes. Whereas, if you look at the Schedule 3 -
8 Revised, there's a larger percentage increase to the
9 residential, because they got 115 percent and the rest --
10 so, that reflects the difference.

11 CHAIRMAN IGNATIUS: I'm just not
12 following why the "Total Design Revenue" at the bottom
13 should be different between the two, other than the \$56?

14 MR. EPLER: Oh. That's total design
15 revenue just for the G1 transformer discount. So, that's
16 going to be different, --

17 CHAIRMAN IGNATIUS: Oh.

18 MR. EPLER: -- because, if you're
19 comparing the 6.876 million to the 6.845 million, that's
20 because they have been allocated less of the SRP.

21 CHAIRMAN IGNATIUS: Understood.

22 MR. EPLER: So, those total design
23 revenues, in each of those rows for the classes, will
24 reflect that difference. That's why it would either be

1 larger or smaller, depending upon what's been allocated.

2 CHAIRMAN IGNATIUS: That helps. That
3 was my mistake. It's a total of a subcategory, not a
4 total.

5 MR. EPLER: I do have a witness
6 available who can explain how this calculation was made,
7 if there are additional questions on this. But --

8 CHAIRMAN IGNATIUS: All right. We may
9 get into that.

10 MR. EPLER: Okay.

11 CHAIRMAN IGNATIUS: Thank you.

12 MR. EPLER: Sure.

13 CHAIRMAN IGNATIUS: Why don't we --
14 Commissioner Honigberg suggested a good idea, to make
15 Exhibit 2A be the -- what's now "2", the first page of 2,
16 so, it's "Schedule 3 with the OCA Recommendation", and 2B
17 would be the second -- the stapled sheet that's entitled
18 "Schedule 3 - Revised". So, that would be "2B".

19 (Whereupon **Exhibit 2** as previously
20 marked was separated into **Exhibit 2A**
21 and **Exhibit 2B** as described above.)

22 MR. EPLER: And, then, Schedule 3 is
23 just the rate impacts of the new allocation. So, that
24 would be -- that's Schedule 4, compared to Schedule 4 in

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 the original filing. So, again, you can see the bill
2 impact differences between the two.

3 CHAIRMAN IGNATIUS: All right. Thank
4 you.

5 CMSR. HONIGBERG: Just a quick question
6 on Exhibit 3. This is a six-page exhibit, each page in
7 the upper right-hand corner says "Page 1 of 6". But it
8 should be "2 of 6", "3 of 6", "4 of 6", right?

9 MR. EPLER: That's correct.

10 CMSR. HONIGBERG: Okay.

11 MR. EPLER: It was a last-minute
12 printing error.

13 CHAIRMAN IGNATIUS: All right.

14 MR. EPLER: Okay?

15 CHAIRMAN IGNATIUS: Why don't you
16 proceed. Thank you.

17 MR. EPLER: All right.

18 **JOHN BONAZOLI, SWORN**

19 **SARA SANKOWICH, SWORN**

20 **RAYMOND LETOURNEAU, SWORN**

21 **DAVID CHONG, SWORN**

22 **DIRECT EXAMINATION**

23 BY MR. EPLER:

24 Q. Could the witnesses on the panel identify themselves,

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 name and your title with Unitil.

2 A. (Bonazoli) John Bonazoli, Manager of Distribution
3 Engineering.

4 A. (Sankowich) Sara Sankowich, System Arborist.

5 A. (Letourneau) Ray Letourneau, Vice President of Unitil
6 Energy Systems and Director of Electric Operations for
7 Unitil Service Corp.

8 A. (Chong) David Chong, Director of Finance and Assistant
9 Treasurer for Unitil Service Corp.

10 Q. Drawing the panel's attention to the document that's
11 been marked as "Unitil Exhibit 1". This is the filing
12 that was made on March 4th, 2014. And, rather than
13 trying to go piece-by-piece through this document, do
14 the witnesses affirm that this filing was -- is your
15 collective work product, was pulled together by you or
16 under your direction, and you verify that it's
17 accurate?

18 (Court Reporter interruption - Multiple
19 witnesses speaking at the same time.)

20 **BY THE WITNESS:**

21 A. (Bonazoli) I do.

22 A. (Sankowich) I do.

23 A. (Letourneau) I do.

24 A. (Chong) I do.

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[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 CHAIRMAN IGNATIUS: Now they speak the
2 same way.

3 (Laughter.)

4 BY MR. EPLER:

5 Q. And, other than the changes that I described on what's
6 been marked as "Exhibits Number 2" and "3", are there
7 any changes or corrections to this document?

8 A. (Bonazoli) No.

9 A. (Sankowich) There are not.

10 A. (Letourneau) No.

11 A. (Chong) No.

12 Q. Okay. Thank you. Ms. Sankowich, could you please turn
13 to the Annual Report for 2013. It's the 43-page
14 document that appears after the proposed tariff changes
15 in the packet. And, could you turn to Page 5 of that,
16 Page 5 of 43.

17 A. (Sankowich) Yes.

18 Q. Okay. And, there, in Paragraph 2.2, there's a
19 description of a deviation in costs and activity based
20 on what was proposed and what occurred. And, there
21 were two areas, "Hazard Tree" work and "Core Work", is
22 that correct, that deviated from what was originally
23 proposed?

24 A. (Sankowich) Yes. They were the largest deviations.

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[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 Q. And, in terms of the "Hazard Tree Mitigation", it
2 indicates that the spending was below the anticipated
3 level, is that correct?

4 A. (Sankowich) That's correct.

5 Q. But, then, on the next page, Page 6, at the bottom,
6 there is an indication that initially it was estimated
7 that 1,760 hazard trees would be removed, but the total
8 number was larger, "2,128", is that correct?

9 A. (Sankowich) That is correct.

10 Q. So, is it correct that, even though the total spending
11 for hazard tree removal was smaller, the Company
12 removed, as part of its normal Vegetation Program,
13 remove more hazard trees than originally planned?

14 A. (Sankowich) That is correct.

15 Q. And, is there any particular explanation for that?

16 A. (Sankowich) The amount of hazard trees that are
17 removed, based on the amount spend, varies based on
18 what's found in the field. So, you could have a large
19 tree that is more expensive to remove. We have also
20 implemented some contract strategy methods that help to
21 improve efficiency in spending and give some incentives
22 to the vendor to bundle those together. So, the
23 variations found in the field with the size of the
24 trees and what was encountered for risk, and also the

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 improvement in our contracting strategy, allowed us to
2 be able to do all of the trees that needed to be
3 removed, plus some additional, at a lower cost.

4 Q. Okay. Now, could you please turn to Page 16 of 43 in
5 that same exhibit.

6 A. (Sankowich) Yes.

7 Q. And, what I'd like you to do, if you could start to --
8 if you could explain, first, looking at Chart 1, what's
9 in that chart? What is the Company attempting to show
10 by that chart?

11 A. (Sankowich) Chart 1, and the following charts on the
12 next page, are attempting to show our monitoring of the
13 Vegetation Management Programs as they affect
14 reliability. Realizing that these programs are still
15 in their infancy, we do not have a lot of historical
16 data, we attempted to measure the programs' progress
17 relative to the past performance using the five-year
18 average. So, looking at Chart 1, the straight line
19 across the middle is the five-year average number of
20 customers interrupted. So, if you looked at the past
21 historic five years, that would be the average amount
22 of customers interrupted. The line that goes up and
23 down, fluctuates from year to year, is the individual
24 year number of customers interrupted for that

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[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 particular year. So, we are looking to see if there is
2 any trends as we work towards completing our five-year
3 cycle with improvement in reliability. So, you can see
4 that, as the program changed and the step adjustments
5 occurred, we did have a slight downward trend in number
6 of customers interrupted. The bar -- the bars behind
7 the line are the number of incidents that occurred.
8 So, that's the number of interruptions that happened.
9 And, those are also decreasing over the years.

10 This is not normalized for weather. So,
11 it takes into account any minor events or anything that
12 would be changing in relative to those areas. So, we
13 do have to look at it from that perspective. But it
14 does capture at least the fact that we are monitoring
15 the system as it goes through.

16 And, the charts on the following pages
17 are --

18 Q. I'm sorry. Just to interrupt you for a moment please.

19 A. (Sankowich) Yes.

20 Q. Before you go there, just so we're clear, in terms of
21 the program that the Company is in the middle of, the
22 Vegetation Management Program, you have years here on
23 this chart 2009 to 2013. And, if you could indicate
24 what years the program was implemented, so, what we're

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 seeing?

2 A. (Sankowich) Sure. The program was implemented
3 beginning partially through the year in 2011. That's
4 when I came on board and began implementing the new
5 program. So, 2012 was the first year of the full
6 implementation, and 2013 as well.

7 Q. And, the full program is a five-year cycle?

8 A. (Sankowich) That's correct.

9 Q. So, these charts reflect basically halfway through the
10 program?

11 A. (Sankowich) Yes, through about two and a half years.

12 Q. Okay. All right. Can you turn to Chart 2 then, on the
13 next page?

14 A. (Sankowich) Yes.

15 Q. Could you please explain that.

16 A. (Sankowich) The chart on the following page, these
17 represent a snapshot of the circuits that underwent a
18 particular type of work for a particular year. So,
19 each chart represents a type of work activity in a
20 year. This also includes information about reliability
21 before the work was done and after. The year that work
22 was performed is represented by a dashed line. So,
23 work could have occurred at any point during that year.
24 So, the reliability of that year is made up of before

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 work was done and after.

2 So, Chart 2 is for the circuits that
3 were pruned in 2011. Chart 3 is for circuits that were
4 pruned in 2012. Chart 4 is for circuits that were
5 pruned in 2013.

6 The next group of charts are those
7 circuits that had pruning and hazard tree work done
8 concurrently.

9 Q. Okay. And, before, just to go back to Chart 2, there's
10 also a bar underneath that chart with additional
11 information. Could you explain what that is.

12 A. (Sankowich) Sure. The little table bar underneath the
13 chart is a representation of the data in the chart,
14 showing the actual numbers. So, you can see the
15 percent change in customers interrupted and the percent
16 change in incidents.

17 Q. Okay. And, you can then continue. I think you were up
18 to Chart 5.

19 A. (Sankowich) Yes. So, the next group of charts, 5, 6,
20 and 7, show the group of circuits that had the activity
21 of pruning and hazard tree done concurrently, for the
22 years 2011 in Chart 5; 2012 in Chart 6; and 2013 in
23 Chart 7.

24 Q. Now, looking at Chart 5, it appears to show a large

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 increase in interruptions in 2013. Is there any
2 particular explanation for that? Or am I not reading
3 it correctly?

4 A. (Sankowich) Yes. It does show that there is a number
5 of more customers interrupted in 2013 than there was in
6 2012, also more overall incidents. The best way to
7 look at this is that we are only looking at one circuit
8 in this scenario. In 2011, because this was only a
9 partial year, only one of the circuits had both pruning
10 and hazard tree. So, you're not looking at a very
11 large subset here. So, if there is any variability in
12 weather, like a minor storm, even one interruption
13 could drastically change the way the chart looks. The
14 more data you have, the more circuits that undergo
15 work, the less one minor storm would show in your
16 chart. So, in this occurrence here, we had a few minor
17 weather events that brought the number of customers
18 interrupted and the number of events that occurred in
19 2013 higher than what had happened, than what had
20 occurred previously.

21 Q. Okay.

22 A. (Sankowich) Continuing on, the last subset of charts,
23 Chart 8 and 9, refer to the Storm Resiliency work that
24 was done in 2012 and 2013. Chart 8 shows the three

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 circuits that had Storm Resiliency work done in 2012,
2 and Chart 9 shows the four circuits that had work done
3 last year.

4 If you notice that Chart 8 has the table
5 at the bottom showing the improvement in customers
6 interrupted and the improvement in number of incidents.
7 The reliability benefit, Chart 9, does not have that,
8 because work was completed last year. So, you don't
9 see the improvement until the following year. So,
10 these charts are set up so that we can continue to add
11 years of reliability data onto them and continue to
12 monitor them and see how the program is working, and
13 then make modifications based on what we see, as far as
14 trends that develop from reliability. But we do expect
15 to see some improvement, as is indicated in some of the
16 charts with the data, there is some indication of
17 improvement. We're looking to see that in the future
18 as the program continues.

19 Q. Okay. And, also, just to clarify, on all of these
20 charts, when you have "number of incidents", are these
21 total incidents no matter what the cause or are these
22 solely tree-related incidents?

23 A. (Sankowich) These are just tree-related incidents.

24 Q. Okay. And, so, if I understood your testimony in

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong]

1 explaining these charts, do you anticipate that, as the
2 Company continues with its VMP, and we have more years,
3 have trimmed more and more of the system, and have a
4 greater population to look at, we'll see a clearer
5 trend as to the effectiveness of the program in these
6 charts?

7 A. (Sankowich) Yes. The more data that we have to add
8 into the charts, I think the better we'll be able to
9 see the improvement.

10 Q. Mr. Bonazoli.

11 A. (Bonazoli) Yes.

12 Q. Could you please turn to Pages 39 through 41 of the
13 Report.

14 A. (Bonazoli) Yes.

15 Q. And, could you explain what the Company is attempting
16 to show in Charts 11, 12, and 13?

17 A. (Bonazoli) Sure. Chart 11, on Page 39, this is our
18 reliability performance for the past ten years. The
19 line in red is the SAIFI, which is the average
20 frequency.

21 WITNESS BONAZOLI: Madam Chairman?

22 CHAIRMAN IGNATIUS: We've got a black
23 and white copy. So, --

24 WITNESS BONAZOLI: Oh, I'm sorry. Sorry

1 about that.

2 **BY THE WITNESS:**

3 A. (Bonazoli) So, the line that has, if you look at year
4 2005, the higher line, --

5 CHAIRMAN IGNATIUS: Thank you.

6 **CONTINUED BY THE WITNESS:**

7 A. (Bonazoli) -- that is the SAIFI, the average frequency
8 interruption. And, then, the other line is SAIDI,
9 which is the average duration. And, below, below the
10 graph, you can see the actual -- the actual performance
11 in numbers. And, you can see in this, in this graph,
12 the last -- the last couple years, since 2010, you'll
13 see a noticeable improvement in the overall reliability
14 of the system. In fact, in last year, in 2013, it was
15 the best year since 2004, which was an improvement of
16 about 27 percent in relationship to the ten-year
17 average. The ten-year average, for SAIDI, is 162.86,
18 and the ten-year average for SAIFI is 1.406. This is
19 not a -- this is not a line on the chart.

20 That chart is for both -- is for all of
21 Unutil Energy Systems, the Seacoast and the Capital
22 area. And, Chart 12 is the same information for the
23 Capital area. And, the upper line on this chart is the
24 SAIDI graph, and the lower line is SAIFI. And, then,

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1 in Chart 13 is the same information for the Seacoast
2 area. And, on this, the upper line, from 2007 to 2012,
3 that is SAIDI, and the lower line is SAIFI. In all
4 charts, you can see, since 2010, there's a trend of --
5 an improvement trend.

6 BY MR. EPLER:

7 Q. Ms. Sankowich, could you please turn to the color
8 document that's been premarked as "Exhibit Number 4".

9 A. (Sankowich) Yes.

10 Q. And, can you please explain what this is?

11 A. (Sankowich) Sure. This document is helping to explain
12 the Storm Resiliency work that was conducted in 2013.
13 The first page, with the maps, shows three of the
14 circuits that work was performed on. The top one being
15 the 13W1 circuit in Canterbury, and the bottom one is
16 two circuits together, the C7W3 and the 18W2. I
17 attempted to show the benefit to customers and people
18 in the area by showing where our substation is and
19 where the work was done on the lines from the
20 substation out through the communities, highlighting
21 some of the municipal benefits, such as the life safety
22 resources, the lifeline resources, and the community
23 resources that also benefited from this enhanced
24 clearing and hazard tree work. So, it gives a little

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1 overview. We also provided a field trip. And, so,
2 this page was used on the field trip to show where we
3 were driving, looking at these lines.

4 On the next page is pictures of before
5 and after of right outside of our substation, on the
6 18W2, from the other page, in Bow. And, it shows the
7 clearing that was done. You can see that there's a
8 large amount of trees that were removed and the
9 overhang taken off from above. So, just to give you an
10 idea of what it looks like in the field after this work
11 has completed and the reduction in exposure from trees
12 that occurs because of it.

13 And, then, I just provided a couple of
14 snapshots from the report showing the number of miles
15 of work and the trees removed, and a little bit about
16 some of the benefits.

17 MR. EPLER: That's all the questions I
18 have. Thank you.

19 CHAIRMAN IGNATIUS: Thank you.
20 Ms. Chamberlin, questions?

21 MS. CHAMBERLIN: I have no questions.
22 Thank you.

23 CHAIRMAN IGNATIUS: Ms. Amidon?

24 MS. AMIDON: Thank you. Yes. We have a

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1 few questions. And, most of them I think are for Ms.
2 Sankowich.

3 **CROSS-EXAMINATION**

4 BY MS. AMIDON:

5 Q. You conducted vegetation -- you conduct vegetation
6 management at customer's requests sometimes, is that
7 right?

8 A. (Sankowich) That's correct.

9 Q. And, do you -- when you do this, do you review the
10 lines to determine whether it's a customer
11 responsibility or a utility responsibility?

12 A. (Sankowich) Yes, we do. We do review all of the
13 customer calls that come in before we go and do the
14 work. If it is the customer's responsibility, we will
15 notify them of that. If it is our responsibility, we
16 then determine whether or not that work needs to be
17 done immediately, because of an emergency, or whether
18 it can be deferred to our regular maintenance work.

19 Q. Thank you. With respect to the work on some of the
20 sub-transmission lines, the Company spent about \$54,000
21 more than was planned. And, I understand that some of
22 this additional cost was unanticipated and it was
23 related to work along railroad right-of-ways. Could
24 you explain the reason for these additional costs?

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1 A. (Sankowich) Yes. We did have some unanticipated costs
2 because of working adjacent to railways. The railroads
3 required us to have an increase in insurance, which we
4 weren't aware of, and hadn't needed in the past. We
5 also needed flaggers, some additional training, and
6 some permits. So, the increase in some of their
7 requirements were transferred onto us and caused some
8 of the overage in our sub-transmission right-of-way
9 clearing.

10 Q. Thank you. In the course of this, of some of our
11 technical sessions on this docket, you explained that
12 you developed certain criteria by which you evaluated,
13 and I'll just say the "ten worst" circuits in terms of
14 reliability. Would you just briefly explain how you,
15 and this is in terms of the Storm Resiliency Program
16 especially, which is a program I understand that you
17 designed and oversee the implementation.

18 A. (Witness Sankowich nodding in the affirmative).

19 Q. So, would you please explain how you developed the
20 criteria or some of the elements of the evaluation
21 method that you developed that provided the
22 identification of the targeted areas for the Storm
23 Resiliency?

24 A. (Sankowich) Sure. I actually have a handout, if this

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1 would be helpful to go over, in color.

2 CHAIRMAN IGNATIUS: Mr. Epler, make sure
3 that Ms. Chamberlin has a copy.

4 (Atty. Epler distributing documents.)

5 CHAIRMAN IGNATIUS: Thank you.

6 **BY THE WITNESS:**

7 A. (Sankowich) I provided this information as part of a
8 discovery request. And, this chart that we're looking
9 at, on the second page here, includes all of the
10 circuits that were chosen to undergo Storm Resiliency
11 work in the UES system. These circuits are not
12 100 percent of the circuits that are available in the
13 Seacoast area. These are only ones that met the
14 criteria for the Storm Resiliency Program. So, the
15 first phase of choosing the lines was, when I developed
16 the plan, which we are proposing to extend for the next
17 nine years, was to make sure that we were only
18 including those circuits which were good candidates for
19 this work. So, those subset of circuits you see here
20 are just those circuits that met that first criteria.

21 From there, we then wanted to prioritize
22 those circuits and do the circuits that had the most
23 amount of benefit first. So, the first thing that we
24 did was look at their ranking, based on a model that I

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1 built looking at three types of data. The first being
2 the number of customers served, the second being the
3 numbers of customers interrupted per event, and the
4 third being the number of events per mile. If they are
5 the worst in each particular subcategory, they get a
6 low score. I then add all three categories together to
7 give them their total rank, and that is the number that
8 you see in the column called "2014 Model Rank". And,
9 those are just tree-related events only, looking at
10 what's driving the reliability. And, it's for the past
11 historic three years. So, the numbers with the lowest
12 score have the biggest reliability issues related to
13 trees for the past three years.

14 So, the circuits that are highlighted in
15 red are the top ten circuits using that model ranking.
16 There's actually 11 circuits highlighted, because two
17 of them have the same rank.

18 From that point, we then do a field
19 check on all of those ten circuits. And, we look for
20 the density of the trees and the number of hazards that
21 are apparent through a field drive-through. And, we
22 gave them a field check ranking at that point.

23 And, then, those circuits that continued
24 forward as having the highest amount of field issues

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1 are highlighted in blue. And that, combined with
2 recent work history or some planning for 2014, helped
3 us to narrow it down to have those circuits be on the
4 short list for potential work. And, from that point,
5 we took the recent work into account, the planned work
6 for 2014, and looked at the mileage, so that we could
7 make a determination of the circuits and still keep
8 within our mileage goals, so that we can effectively
9 manage the work and be able to deliver it
10 cost-effectively and to a high quality based on our
11 standards. So, that's how we derived the three
12 circuits that were proposed for 2014 work.

13 BY MS. AMIDON:

14 Q. And, those are the circuits that are identified in red?

15 A. (Sankowich) That is correct, yes. So, the ones that
16 have the reddish green highlighting on them, those
17 three circuits are the ones that are proposed in our
18 filing.

19 Q. And, where are the locations of those circuits?

20 A. (Sankowich) They are in the Seacoast area, in Kingston
21 and Exeter areas.

22 Q. Thank you. How has -- have you had any customer
23 feedback on this program?

24 A. (Sankowich) Yes, we have. We've had a number of

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1 customers call into us, e-mail, tweet on our Twitter
2 page, and also just speak with us when we're out there
3 doing work. And, our response from customers has been
4 an overwhelming amount of positive support. We are
5 removing a large amount of trees, and we were very
6 concerned with how customers would react, and whether
7 this would be a positive program giving us benefits.
8 But customers have overwhelmingly come to us saying
9 that they see a difference from the work, and that, in
10 minor rain events or, you know, some of the snow events
11 we've had in the last couple of years, that they felt
12 that their reliability has improved because of the
13 work, and they were happy to see that we were
14 responding to some of the concerns they had after the
15 major events that we've had in 2011 and around that
16 same period.

17 Q. And, are you able at this point to isolate any and
18 attribute any reliability improvements to the Storm
19 Resiliency Program? I know it's early in the program.
20 So, that's why I'm asking if you're able to at this
21 point?

22 A. (Sankowich) We have been able to look at a couple of
23 minor storms that we had and do a benefit --
24 cost/benefit analysis on those minor events. We did

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1 have Hurricane Sandy that came through in 2013, and we
2 were just beginning our Pilot Program in our Seacoast
3 area there. And, we did have one circuit that was
4 completed at that time and that performed well. We did
5 not have a system lockout, meaning that some customers
6 on that circuit that was completely done had no loss of
7 power during Hurricane Sandy, and they were happy to
8 see that. We had a couple minor events on that circuit
9 in areas where we didn't do work, but we were able to
10 restore those quickly. So, we believe that there was
11 some savings as far as the amount of troubles that
12 occurred and the resources that were needed to use
13 them. So, we attempted to quantify that in our
14 cost/benefit analysis. And, even though those are
15 minor, we do feel that that's just a snapshot of one
16 year of a larger program, in only one circuit of
17 multiple circuits that are being done. So, as this
18 program progresses, those will continue to build, and
19 we'll be able to see more improvement, not just for
20 events like Hurricane Sandy and the snowstorms that
21 we've had, but for everyday, you know, wind events and
22 even in blue sky.

23 MS. AMIDON: Mr. Frantz has a couple
24 questions for Ms. Sankowich.

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1 MR. FRANTZ: Thanks. Thank you.

2 BY MR. FRANTZ:

3 Q. This is a multiyear program. And, one of the questions
4 we have is, several years from now, how are you
5 defining success, that you know that you're on target?
6 And, if you're asked that question three years from
7 now, what quantifiable data do you have that you'll
8 look at and say "this is actually a successful
9 program"?

10 A. (Sankowich) Yes. We have been working with that as
11 well, because that's an important piece, to be able to
12 show that we're making improvements. So, besides just
13 looking at the overall reliability trends, we're
14 looking at a way that we can use the actual reliability
15 data and sort of look at some of the other studies that
16 have been done. In our cost/benefit analysis, we
17 reference a study from the Berkeley Labs that looks at
18 the costs to customers for having interruptions over
19 the course of a year. And, so, we were -- we were
20 thinking about applying that projection that they use
21 to our actual customer base that's being affected by
22 these programs, and then monitoring the reliability
23 from that point. So, we were trying to take some of
24 these studies and then actually use our own data and

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1 see what kind of benefit we've been getting from there.

2 Q. But do you have SAIDI/SAIFI indices that you target on
3 these circuits over time, to see if they actually meet
4 some target levels or number of incidents or number of
5 minutes?

6 A. (Letourneau) When we designed this program, we weren't
7 looking at improvements in reliability as being the
8 main driver of the program. The main driver, although
9 it is, you know, part of, you know, when you are
10 removing as many hazard trees as we are and removing as
11 many ground-to-sky clearing for, you know, 15 or
12 30 miles a year, that will have, you know, benefits to
13 the system as the picture shows in Exhibit 4.

14 The real design of the program was more
15 for the Page 1 of Exhibit 4, the life safety resource,
16 lifeline resources, and community resources. That's
17 why we designed the program. We were hearing, after
18 every major event, from our municipals, that they are
19 concerned with wires down in town, that their emergency
20 shelters were relying on, you know, very old generators
21 that may not last three or four or five days. People
22 with generators at their homes were having to drive 50
23 miles to find an open gas station, those types of --
24 so, we designed this program really to try to, in every

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1 community that we serve, have an area that, after we
2 have a significant event, again, the SRP was designed
3 for a significant event, a hurricane, a major ice
4 storm, that you're going to have a lot of damage to all
5 your circuits, there's no doubt about that. But, if we
6 can keep our sub-transmission lines energized, and if
7 we can keep from our substations to our first
8 protection point on all our circuits that we have, we
9 will have someplace in the community that will have
10 electricity. You'll be able to go get a warm cup of
11 coffee, you'll be able to get a hot meal, you'll be
12 able to get fuel for your generator. The town will
13 have roads that will be unblocked, because the trees in
14 that area won't come down, so that the fire department,
15 the police department won't be on the phone to us to
16 try to get us to remove trees that are wrapped in
17 wires, those types of things.

18 So, if we're successful in that, and you
19 asked a question earlier about "three years from now",
20 I am hoping, and I hate to hope for storms, that we
21 have a major event, and we're able to prove out this
22 theory that, because, when you look at trying to keep
23 your electric system energized after these major
24 events, the only thing that you can compare the SRP to

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1 is undergrounding our system. And, I think that we've
2 had enough studies done on undergrounding, and we know
3 how expensive, and it's just something that is not a
4 feasible solution. This is the best solution we have
5 versus undergrounding to keep our system energized.

6 Q. Have any of the towns, and I'm certainly aware of one,
7 Canterbury, that's had some concerns about the amount
8 of vegetation removed, and how it would affect their
9 town, especially as far as scenic value and on scenic
10 roads. Have you had any trouble with towns that --
11 that one was a result, I believe, in Canterbury. But
12 have you run into any opposition with some of those
13 other towns that you're in?

14 A. (Sankowich) Everywhere that we have done work so far,
15 we have been able to work with the towns and come to a
16 resolution. There were some concerns in Canterbury
17 about some trees in the town common area, that are
18 beautiful trees when they're in color in the fall.
19 However, they are old and starting to mature and fall
20 apart. So, we were looking to have them removed. But
21 we were able to come to a compromise by doing some
22 selective pruning and cabling through the town to avoid
23 that. So, we do take into account the different
24 considerations of towns and municipalities that we're

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1 working in.

2 And, when we were looking at the
3 circuits to include in this program, we also included
4 the scenic roads in that first analysis. So, there are
5 a couple of circuits that go through an area that have
6 high amount of scenic value, and there would be some
7 opposition. So, we elected in those areas to not apply
8 this program there at this time. But there are some
9 areas that we felt that they were critical to either
10 the infrastructure or the municipality, and they might
11 still be scenic roads, but we felt that we could
12 explain the need for the work and really get our point
13 across and get some support. So, we did reach out
14 beforehand to the municipalities and explain what was
15 going on and our thought process for including some of
16 these roads, and got some support at that time.

17 So, we feel confident that, when we come
18 to the towns and we sit at the planning board meetings
19 and talk about the scenic roads, that those roads that
20 we've identified we will be able to get support from,
21 whether it's by a small compromise or by just education
22 of what the benefits are. So, I think, as long as it
23 continues in the atmosphere that we've had recently
24 with storms, and it being on people's minds, and them

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1 really wanting this type of a program, that we
2 shouldn't have too much opposition, even though we do
3 run into areas that are high scenic areas and might
4 have some concerns.

5 The other thing to note that we do
6 highlight when we're out there talking to the customers
7 and the towns, is that, while we are removing a large
8 number of trees, we are not removing all of the trees
9 in an area. So, even from the picture, you can see
10 that there are still trees remaining on the roads. The
11 people that live there, it looks pretty drastic, that
12 we removed a lot of trees. But those trees adjacent to
13 the lines will still continue to grow and bloom, and
14 those trees will leaf out, and that change will be less
15 drastic over time. So, while it might be an immediate
16 change, when you see the crews going through, but the
17 people will still be able to have beautiful roads that
18 they can drive on. We're not removing all of the
19 trees. And, we're trying to do as least amount of
20 damage as we do as we come through. We use cranes and
21 specialized equipment, to really make sure that the
22 underbrush that's not going to grow up into the lines
23 is not damaged where possible. And, so, that way, we
24 can preserve some of that beauty, and maybe even

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1 highlight some of the rock walls or things that maybe
2 haven't been seen in a while. And, so, we really bring
3 that out to the customers when he talk to them, and
4 really get them to be able to buy in and enjoy the
5 benefits that the program affords.

6 Q. As you mentioned, at the bottom of Page 6 of the
7 Report, you ended up taking a lot more hazard trees out
8 than you anticipated. Do you think that will occur as
9 you go on with this program, that there will be more
10 hazard tree removal than anticipated? Or, do you think
11 you'll actually see sort of what you anticipate in the
12 budgets? It's difficult, I know, until you actually
13 get out in the field and see the trees and --

14 A. (Sankowich) Yes. I think that we will probably stay on
15 track more around what we are anticipating for this
16 year. You know, we revised the number of hazard trees
17 we think we're going to do based on what it cost us
18 last year. So, we're getting a more accurate number
19 each year as we go. Depending on where you're doing
20 the work, it might be more costly, depending on what
21 the contractors have available for crews, and other
22 areas they're working, other projects, it changes the
23 price. So, we're doing everything we can to keep it
24 the most economical as possible and get more hazard

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1 trees done. So, I'm hopeful that we'll continue to be
2 able to do more hazard trees.

3 But I do think that, depending on the
4 area we work in, we might not be as fortunate as we
5 were this past year. Judging by the work that's going
6 on so far this year, we have had some larger, a little
7 bit more expensive removals. But I don't think it's
8 going to be a deterrent to finishing our work this
9 year, but I don't think we'll be above the amount of
10 hazard trees like we were last year.

11 MR. FRANTZ: Thank you.

12 BY MS. AMIDON:

13 Q. This is the last step increase that came out of the
14 Company's most recent distribution case, is that
15 correct?

16 A. (Chong) Yes, it is.

17 Q. And, insofar as the allocation of the costs with
18 respect to the Storm Resiliency Program, that could
19 change subject to a cost of service study in the
20 Company's next distribution rate case, is that true?

21 A. (Chong) Yes. That the allocation would be subject to a
22 cost of service study in the next rate case.

23 Q. Okay. Thank you. And, finally, I just want to make
24 sure we're clear. The Company is asking that the Pilot

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1 Storm Resiliency Program be made permanent in this
2 filing, if that right?

3 A. (Sankowich) That is correct.

4 MS. AMIDON: Okay. Thank you. That's
5 all I have. Thank you.

6 CHAIRMAN IGNATIUS: Thank you.
7 Commissioner Scott?

8 CMSR. SCOTT: Thank you. Good
9 afternoon.

10 BY CMSR. SCOTT:

11 Q. So, let's pick up where Attorney Amazon -- I'm sorry,
12 Amidon just left off. I've been on the Internet too
13 long, I think. So, what does making the Storm
14 Resiliency Program permanent compared to the current
15 pilot, what does that -- what is the impact of that?
16 And, again, whoever would like to answer, just not all
17 at once, unless you use the same words, as we said
18 earlier.

19 A. (Sankowich) Is this from a rate perspective or from a
20 program perspective?

21 Q. From a program perspective. What's the tangible
22 difference between if it stays a pilot or if it becomes
23 permanent?

24 A. (Sankowich) The only difference is that it affords us

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1 more flexibility in being able to put the work out to
2 bid and get it done. We'll have more time to plan, and
3 we'll be able to offer successive programs to our
4 vendors, hopefully increasing the efficiency and
5 reducing the costs of it, if possible, or at least
6 limiting any future increases.

7 However, the scope of work will remain
8 the same. So, there will be no changes to the scope,
9 the amount of work, and what was actually done in the
10 pilot. The only thing it allows us is the benefit of
11 knowing that it will continue, and we can offer that to
12 our vendors, so that they can have the right equipment,
13 we have more time to work plan and offer more time for
14 them to look at the work in the field and provide an
15 accurate price.

16 Q. Okay. That's helpful. So, one of my concerns is what
17 I expected generically, and, Mr. Letourneau, your
18 characterization was actually very helpful to put in
19 perspective for me what the program is trying to
20 accomplish. What I envision, going from a pilot to
21 permanent, what I expect generally, notionally, is a
22 pilot gives us some real-world data, we take that data,
23 and then we say "we're good to go" and we make it
24 permanent. And, my reluctance to this program, as you

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1 mentioned, you had the October winter -- October wind
2 storm, a little bit of Sandy, but you have a small
3 amount of real data. And, then, you're using the
4 lab -- more labs, you're using some good information
5 out there, but that seemed to be information to me that
6 would justify continuing the pilot. So, I'm just
7 trying to draw the connection as why -- why do we have
8 enough data at this point to make this permanent? I
9 guess, ask you what I mean, that's what I meant.

10 A. (Sankowich) I feel just from experiencing the amount of
11 work that we've been doing, and the results that we got
12 in those minor storms, that it did make a large impact.
13 However, quantifying that impact and the impact to the
14 customers is what we struggle with. Just from seeing
15 the amount of trees that were removed and the reduction
16 in exposure, it's a big, big impact on what has been
17 done. And, then, looking at how those circuits have
18 fared in our everyday events, and even those minor
19 events, there really hasn't been any issues there. So,
20 I know that it's only a couple of, you know, of these
21 major events, but the overall perspective of working
22 and doing this type of vegetation management work for
23 the past 13 years or so, and experiencing what types of
24 normal troubles happen and things that go along with

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1 it, this is the first time that I've ever seen or had a
2 chance to implement something of this magnitude where
3 you're really removing this amount of trees and
4 exposure. And, I really feel that the benefits are
5 there. We just haven't had the opportunity to be able
6 to show them yet, because it's a very hard thing to get
7 your hands around. I am preventing something from
8 happening. So, we're taking these trees down. I can't
9 prove to you that one or two or five of those trees
10 were going to cause a massive amount of damage. But,
11 just from being out and working in storms, I know that
12 large trees fail, they take down wires onto the ground,
13 they cause emergency hazards, they block roads, they
14 take equipment down onto the ground. And, while there
15 are costs associated with repairing all of that and
16 having crews do that, you know, there's a bigger impact
17 is to the customers that are served.

18 And, we haven't been hit with a direct
19 impact like Sandy. But I know that, from areas where
20 they did get hit with that, and there were whole
21 centers of towns and big blocks of areas that had no
22 power, people were not able to get gas, there was
23 multiple days they're out, just panic starts to set in
24 for people. And, that's what we're really looking to

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1 avoid. We want to have a center of town where people
2 can go to the shelters and gas stations, maybe get some
3 food. And, maybe their house will be without power for
4 a couple days or however long it takes us to restore in
5 a major event, but the panic won't set in, because they
6 do have an area where they can go and get some
7 resources.

8 And, so, it's hard to prove that that,
9 you know, will happen. But, just from experiences of
10 doing this work, and how much vegetation was cleared in
11 the past and how much we were able to do now, I really
12 feel that there's a lot of benefit that it brings, and
13 that the cost really outweighs what it would, you know,
14 the benefits that come back. So, really, the benefits
15 are just so much greater to the customers, even if you
16 can't show it in actual dollars, you know, saved in a
17 minor event. I think, over time, it will really show
18 on our system.

19 Q. I appreciate that. And, the other thing, what I would
20 hope a pilot would do for us and you is to kind of
21 flesh out one of the other, not only -- one of the
22 questions, obviously, "are there benefits and is it
23 worth it?" But there's also a question of "how much
24 and how little?" So, you know, do we have the right

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1 amount we're spending? Are we spending too little on
2 this or too much on this? And, those type of metrics.
3 So, how do we know that right now, to go -- to say that
4 we should now go make this a permanent program?

5 A. (Sankowich) Yes. That was something that we looked
6 into when we went from the first year of the pilot to
7 the second year. Obviously, the more lines we do
8 immediately, the greater the benefit we have right
9 away. And, if we could do all of the lines tomorrow,
10 then, if we had a storm the following day, we would get
11 the biggest amount of impact. However, it's not
12 practical for us to be able to do all of those lines at
13 once. It's a large amount of work. Our vendors are
14 not equipped for it. We want to make sure that we can
15 handle the volume of work that comes in and be able to
16 monitor it appropriately, and get the quality that is
17 required. So, that's how we determined the amount of
18 mileage for last year's 2013 pilot, was the test of the
19 actual volume of work, the spending and the level that
20 we would like to continue forward. And, we found that
21 we were able to manage that amount. We had two vendors
22 in the second year, instead of just one. We were still
23 able to handle those two vendors, even though it's a
24 little bit trickier. But we felt that that was a very

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1 good level, where we could still get results by doing
2 more than what's happened in the first year, but still
3 be able to get those good results. And, you know, we
4 were concerned with adding any more than that, we might
5 not be able to manage it as effectively in a year time
6 frame, and that the quality and things might suffer.
7 So, that's why we left it at that mileage there.

8 Q. Okay. Thank you. And, earlier, and I think it was
9 more just -- more explicitly in the Vegetation
10 Management Program specifically, but you showed us the
11 charts and went through those. And, I think you
12 mentioned, you know, you'd use these to monitor trends,
13 and then perhaps to modify the programs. Can you
14 elaborate, how would you do that? What things would
15 you change to the program based on the trends?

16 A. (Sankowich) We could look at overall cycle length,
17 based on areas that were worked. So, if we noticed
18 that there's a trend in a particular location, we can
19 inspect, "well, why are we having more reliability
20 problems after, say, three or four years?" By the time
21 things start to regrow, we might want to take a look at
22 growth rates in those areas. So, if we found maybe the
23 Seacoast area, closest to the coast, was having more
24 growth, we could then look at modifying the cycle time

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1 period there.

2 We could also see if there's a
3 particular combination of work that works better,
4 whether it's just pruning by itself or pruning and
5 hazard trees, or maybe hazard trees on a separate
6 cycle. And, we could try to schedule the activities in
7 the same year or not, to get the biggest amount of
8 return. We have found so far that doing the work
9 together seems to give us a fairly big return. The
10 reliability in those areas seems to be better than just
11 straight pruning.

12 Also, reliability issues, as the years
13 progress on, we can look at all of year one together,
14 all of year two together. So, right now, it's grouped
15 by work for that year. So, you're looking at 2012
16 onward by year. But you could stack them so that all
17 of the year ones are together. So, we prune Circuit A
18 in 2011, Circuit B in 2012. But that, if you align all
19 the first year after pruning, you can see a trend as to
20 what the growth rates -- as to what growth may have
21 impacting and the time period between exposure may have
22 on reliability. And, that could lead us to make some
23 investigation onto species. Maybe there's a particular
24 species that's causing us problems, or other changes to

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1 our specifications on what we're requiring the vendors
2 to do when they're out there, maybe add in branch
3 reduction or overhang reduction or things like that,
4 that could help us to extend our reliability through
5 the whole five-year window. So, really, it's just an
6 indicator of where we might be having problems, whether
7 it's with our cycle length, with what we're actually
8 doing, as far as work goes, or with timing.

9 Q. Thank you. And, obviously, vegetation grows, it's not
10 a bad thing, it's just what happens. Is this a
11 never-ending process? I mean, are we -- is this just
12 part of doing business and ensuring reliability?

13 A. (Sankowich) Our normal Vegetation Management Programs
14 is somewhat never-ending. Trees always grow back. So,
15 you're going to be back out there pruning. However,
16 things change every day. We have storms and pests and
17 weather events and changes that, you know, man-made and
18 natural, that change the forest environment. So, it's
19 always going to be evolving. But there will be some
20 level of work that needs to be done from now and on.
21 If we have wires and trees coexisting in the same
22 space, we're going to always have to do some
23 maintenance.

24 The Storm Resiliency work, that -- we

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1 anticipate that there will still need to be some work
2 continuing on in the future from that. But the level
3 of that we are not sure what that level will be. We're
4 taking on a large number of big, mature trees. So,
5 that number shouldn't be the same the year we come
6 back, because there are not going to large mature trees
7 overnight. But we do anticipate that the forest will
8 continue to mature, and there may be other hazardous
9 trees. So, there might be some level of maintenance
10 required for that, but we don't expect it to be at the
11 same level as the first pass-through. But we have to
12 evaluate and see how the circuits are performing and
13 determine what the appropriate level will be.

14 Q. Okay. Thank you. And, finally, for me, on your
15 Vegetation Management Program Annual Report, on Page
16 42, there was a line item that says, granted, it's a
17 small amount, it says "Improper installation". And, I
18 was just curious what that was? It's on Table 19.

19 A. (Letourneau) I can answer that. You want to do it?

20 A. (Bonazoli) Okay. That's in the regular reliability.

21 Q. Okay. Thank you.

22 A. (Bonazoli) So, Table 19 --

23 A. (Letourneau) So, that table is showing all the type of
24 outages that we track on our system by basically what

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1 we call a "cause code". So, each of those is, when a
2 line worker responds to a trouble call, they have to
3 mark on a trouble report what is the cause of the
4 outage, and these choices in Table 19 are what cause
5 outages for us. So, an "improper installation" could
6 have been a connector, for example, that's on the wrong
7 size wire. And, over time, it fails. So, the lineman
8 gets there, and he looks at the connector and says "Oh,
9 this is for a number" -- you know, "a one aught wire,
10 but it's a four aught wire, put the wrong connector."
11 So, that would be an example of "improper
12 installation".

13 Q. I kind of assumed all that. I was more pointing out --
14 and I assume there's training programs, and that's not
15 a normal thing?

16 A. (Letourneau) No. That's, as the Director of Electric
17 Operations, that's one I don't like to see.

18 CMSR. SCOTT: And, as a Public Utilities
19 Commissioner, that's one I don't like to see. Thank you.
20 I'm all set.

21 CHAIRMAN IGNATIUS: Commissioner
22 Honigberg, any questions?

23 CMSR. HONIGBERG: I have a few.

24 BY CMSR. HONIGBERG:

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1 Q. What exactly does an arborist do?

2 A. (Sankowich) There are many types of arborists. And, in
3 general, just an arborist is somebody that takes care
4 of trees and does tree care. I would be a utility
5 arborist, and I would do tree maintenance and care for
6 a utility.

7 Q. What's your education and experience to become an
8 arborist?

9 A. (Sankowich) I have a Bachelor of Science degree in
10 Forest Resource Management. So, I went to a specific
11 school for forestry, learning about the forest and how
12 to manage trees in an urban and a forested setting.

13 Q. You talked a little bit about how you work with towns
14 when there are concerns, and you try to anticipate
15 them, avoid them. Do you have other mitigation things
16 you can offer up? To plant trees elsewhere, if you're
17 taking trees down? I don't think you mentioned that.

18 A. (Sankowich) Yes. I did not mention that. But we do do
19 replanting programs as well. We really want to work
20 with the communities and, in instances where we have to
21 remove some large trees, especially if they're only in
22 moderate health, but they're going to require pruning,
23 that could be a detriment to their health, we offer
24 replacement trees. We tend to give out smaller growing

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1 trees that will stay underneath, that can exist
2 underneath the wires and provide sort of a green area
3 in that same spot. We occasionally will provide larger
4 trees, but require them to plant them farther away from
5 the wires. Depending on what they're looking for and
6 how much space is available, whether the tree was on
7 private property or whether it was a municipal tree, we
8 weigh all those factors in. But we do offer
9 replanting, because we realize that we are removing
10 canopy in the town and it affects their towns.

11 Q. Did the program that you developed come from someplace
12 else? Are there others doing things like this that you
13 cribbed off of?

14 A. (Sankowich) Yes and no. This program is unique. I
15 don't know of any other utility doing it to the extent
16 that we have. But there are lots of reliability
17 programs that involve tree removal and maintenance that
18 utilities do. I polled some of the other system
19 arborists in nearby utilities that do similar work, to
20 try to figure out what improvement they were getting,
21 what costs they had for their work. However, most of
22 the other utilities have vegetation management as one
23 component of their programs. So, they may do other
24 hardening type activities as well. We really wanted to

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1 focus not just on pruning and the reliability that's
2 benefited from pruning, but, really, on the overall
3 experience of large storms and how they cause issues
4 for our customers and the concerns our customers have
5 raised. And, we are looking at the customer experience
6 related to the vegetation management work. So, we
7 weren't just looking at pure reliability in everyday
8 instances, and we are looking for that storm impact.
9 And, so, that sets it apart a little bit.

10 The amount of trees that we're removing
11 is also setting it apart. Typical hazard tree programs
12 may remove three to five hazard trees a mile. Enhanced
13 hazard programs that some of the other utilities do may
14 remove 11 to even 20 trees a mile. We're removing 70
15 to 100 trees a mile. So, we're way advanced as far as
16 the amount of hazard trees we're removing. So, it
17 really is steps above what some other utilities have
18 done.

19 CMSR. HONIGBERG: That's helpful. Thank
20 you very much.

21 CHAIRMAN IGNATIUS: Just a couple more
22 questions.

23 BY CHAIRMAN IGNATIUS:

24 Q. I ask you to take a look at the Report on Page 24.

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1 Chart 9 shows for "Storm Pilot Circuits Only in 2013".
2 So, I assume that means work that was done in 2013
3 under the Storm Pilot Program.

4 A. (Witness Sankowich nodding in the affirmative).

5 Q. And, there's a significant increase in the number of
6 incidents and outages in the 2013 bar to the far right.
7 Can you explain again why we'd be seeing such a large
8 increase there?

9 A. (Sankowich) Sure. Yes. This chart is showing that we
10 picked the right circuit to work on. That dotted line
11 there is showing the year that work was done. So, last
12 year, when we got approval to do our pilot, we began
13 work planning. Immediately we hired some people to go
14 out and mark all the trees and talk to all the
15 customers, talk to the municipalities. After that was
16 all finished, we had the vendors come in and bid, and
17 we awarded work. So, the actual tree removal did not
18 begin until the end of September. So, we're looking at
19 September, October, November, and December, where the
20 vendors began removing those trees. So, that's why
21 that line is in dotted line, because it includes events
22 that occurred before work happened, and potential
23 events that happened after work happened. So, that
24 year is sort of a mix of showing what happened. So, in

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1 this case, work was not even started until the end of
2 the year. So, you're mostly showing events that
3 happened before work occurred on that line.

4 So, you can see from 2010, 2011, 2012,
5 it looks like there were more events occurring, more
6 customers being interrupted. So, we did not want that
7 trend to grow. So, hopefully, doing this work will
8 allow it to go the other way. So, I look at this and I
9 say "that was a good circuit to choose." It was
10 obviously having some issues. And, when we went out
11 there and looked at all those circuits, we definitely
12 found a lot of work. We removed, you know, 2,271 trees
13 along all of those lines in the last quarter of 2013.

14 Q. Thank you. That's helpful. And, in the paragraph
15 below that, in the second line it says "there was a
16 slight reduction in incidents, but an increase in
17 customers interrupted during this year." I guess
18 that's 2013. Any explanation for why that might occur?

19 A. (Sankowich) Yes. That's why we look at not only the
20 number of events that happen, but the customers
21 interrupted, because it can help us to pinpoint where
22 the problems are happening. So, we could have an
23 increase in events, and have less customers affected,
24 if the events were happening farther away from our

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1 substation. So, if you have one event outside your
2 substation, it will affect all of the customers that
3 are served off of that line. So, you could have one
4 event that affects the 2,000 customers served on that
5 line. So, we are targeting our program to be outside
6 the substation to our first protection device or our
7 second, where the most customers are affected. So, we
8 would hope that the number of customers that are
9 interrupted per event would decrease as the program
10 progresses. So, while we may not see a huge
11 improvement in the number of events, because there
12 could still be small events occurring on taps in front
13 of people's houses and things like that, we didn't do
14 any work under the Storm Resiliency Pilot there, so
15 there may still be limbs and trees that fall there, and
16 we can't avoid all of those. However, we may only have
17 two or three or four customers out related to that one
18 event, as opposed to thousands of customers out because
19 of one event. So, we want to look at all of those
20 indices to try to figure out where the problems are
21 happening and target exactly what the problem is.

22 If we see that there were a lot of
23 customers interrupted, but not a lot of events, then we
24 might think that there needs to be some pruning work or

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1 we might target the work that needs to done a little
2 bit differently. So, using these indices helps me to
3 figure out what work needs to be done, and then we
4 always follow it up with a field inspection, where we
5 can see firsthand exactly what's going on. But it
6 gives us a good place to start.

7 Q. Thank you. At the bottom of that page, it says, in the
8 second half of that sentence, it says "barring any
9 unforeseen items such as weather", and goes on, that
10 you'd "expect to see a continuing trend in reliability
11 improvement." I found that an odd sentence. So, I
12 thought the whole point of this was that, because of
13 weather, you're looking for improvements, not in spite
14 of it or "as long as there's no weather issues, we'll
15 be doing okay." So, why don't you explain what --

16 A. (Sankowich) Sure.

17 Q. -- what you're getting at in that sentence?

18 A. (Sankowich) I think the issue here was that this was
19 broken out into these little subcategories, and this
20 final paragraph was supposed to be conclusions for the
21 whole -- all of the charts, not just the conclusion for
22 the Storm Resiliency Pilot charts. So, the first part
23 of the sentence says "we will continue to monitor those
24 circuits that have undergone pruning, hazard tree and

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1 Storm Resiliency work." The "weather" is more
2 affected -- is more directed towards the pruning and
3 some of the hazard tree -- typical hazard tree work.
4 It's not really directed towards the Storm Resiliency
5 work. However, there are weather events where our
6 Storm Resiliency work may not have a big effect. If we
7 get a direct hit from a large scale hurricane or big
8 catastrophic event, say we got a tornado, something
9 like that, healthy trees from other streets may come
10 over and knock down lines. So, we can't prevent
11 everything. We are really trying to make a difference
12 in that minor storm category, to just beginning with
13 the major storm events, not really the catastrophic.
14 So, there is -- there is some variability to weather.
15 But that sentence -- that line was really directed more
16 towards the pruning and the hazard tree, which is much
17 more variable from everyday weather events.

18 Q. That makes sense. Thank you. The Pilot Program was
19 started as a five-year pilot, is that correct?

20 A. (Sankowich) We didn't decide on a five-year at that
21 time. We had -- we had thought about potentially
22 trying to make it five years, but we didn't design the
23 Pilot at that time for five years.

24 Q. All right. So, when you were talking about going to a

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1 permanent program, you would have a greater ability to
2 plan and to work with vendors and be more
3 cost-effective, right now are you doing it year to
4 year?

5 A. (Sankowich) Yes. Right now, we were waiting for
6 approval to do the work, and then implementing it at
7 that point. So, we have not started any of the 2014
8 work. So, we're really limiting the amount of time
9 that we have to work plan and our vendors to get out
10 there and do the work. It's a hard time for the
11 vendors to be able to get a workforce up and mobilized.
12 At the end of the year we get a lot of feedback from
13 them that it would be easier for them to get the
14 workforce to do the work if they could start a little
15 bit earlier. So, yes. Right now, we don't begin the
16 work until we had gotten approval for the pilot portion
17 of it.

18 Q. Would it be helpful to the Company to have a continuing
19 pilot program, but that gave you a broader period of
20 time to plan for, say, three years out or whatever it
21 might be, rather than year-to-year, as you continue to
22 develop data to decide whether it really should become
23 a permanent program or not?

24 A. (Sankowich) Yes. The longer that we know that we will

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1 have funding and the ability to continue with the
2 program, the more I can customize it to be attractive
3 to the vendors, that's helping to work plan and to
4 actually do the work. So, the more that we know what's
5 coming in the future, the better we can package it.

6 Q. Thank you. On the change to the allocation of the rate
7 impacts charts, we had Exhibits 2A and 2B, and then I
8 guess Exhibit 3 shows the bill impacts. I don't know,
9 Mr. Chong, did you develop those?

10 A. (Chong) I did not. That was Mr. Debski.

11 Q. Okay. We can see the percentage difference on the
12 first page of that Exhibit 3. And, by flipping back to
13 the old one, see that they have all come down a bit on
14 the percentage difference for residential customers.
15 Does it show the actual dollar figure differences?
16 What the dollar rate impact will be for customers?

17 MR. EPLER: Perhaps Mr. Debski could
18 answer that. He would need to be sworn first before doing
19 that.

20 CHAIRMAN IGNATIUS: That would be fine.

21 MR. DEBSKI: I have two schedules before
22 me --

23 (Court reporter interruption.)

24 (Whereupon **Douglas Debski** was duly sworn

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1 by the Court Reporter.)

2 **DOUGLAS DEBSKI, SWORN**

3 WITNESS DEBSKI: My name is Douglas
4 Debski. I'm a Senior Regulatory Analyst for Unitil
5 Service Corp. I have two sets of bill impacts before me.
6 One is -- just reflects the \$11 difference in the revenue
7 requirements, versus the original filing. And, then, the
8 second one is under the OCA and Staff's recommendation to
9 remove this SRP Program and allocate it proportionally to
10 each customer class.

11 If I just compare a 600 kilowatt-hour
12 residential bill, it decreases from \$105.42 to \$105.28.
13 So, there's a 14 cent difference.

14 CMSR. SCOTT: And, to clarify, you're
15 not looking at of the exhibits, you're looking at your
16 computer, is that right?

17 WITNESS DEBSKI: The one that represents
18 \$105.28 is Exhibit 3.

19 CHAIRMAN IGNATIUS: And, I finally found
20 what I was thinking of to compare it to, in the
21 "Explanation of Filing" pages in the packet that was filed
22 on March 4th, on Page 3, there's a summary of all the
23 different provisions. And, there's a section called "Bill
24 Impacts". And, it has for the "typical 600 kWh

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1 residential customer would see a monthly bill increase of
2 \$1.13 or 1.1 percent". And, so, I was looking for what
3 would be the comparison to that?

4 WITNESS DEBSKI: The comparison to that
5 would be 99 cents, or 0.9 percent.

6 CHAIRMAN IGNATIUS: Thank you.

7 CMSR. HONIGBERG: And, you're pulling
8 those numbers off of the first page of Exhibit 3, and
9 comparing it to what was Page 1 of Schedule 4 in the
10 original filing, is that right?

11 WITNESS DEBSKI: Correct.

12 CHAIRMAN IGNATIUS: Thank you. I have
13 no other questions. Anything further? Commissioner
14 Honigberg.

15 CMSR. HONIGBERG: I do have one question
16 again about the program, for Ms. Sankowich.

17 BY CMSR. HONIGBERG:

18 Q. As you have studied and followed or are continuing to
19 follow the ones -- the circuits that you worked on, do
20 you have a control group of any sort that you're also
21 looking at, similar characteristics, ones that you
22 aren't able to get for other reasons, to see if you can
23 compare that control group at some point down the line
24 with the group that you're able to work on?

[WITNESSES: Bonazoli~Sankowich~Letourneau~Chong~Debski]

1 A. (Sankowich) For the Storm Resiliency Program?

2 Q. Yes.

3 A. (Sankowich) We didn't necessarily indicate a control
4 group, but we did compare it, after the storm event, to
5 adjacent areas that did not undergo work. So, because
6 storms are variable, they hit in different areas, we
7 didn't want to just designate one control area that
8 might not be affected the same. So, we kind of did it,
9 as the storm hit us, then we looked and say "okay,
10 well, this particular area was hit, and this adjacent
11 circuit may be just slightly north, to the west, was
12 hit with similar amount of damage, we'll use that as a
13 comparison." Because if we could have picked one that
14 was maybe to the south and the east or something, and,
15 you know, it didn't get quite the same amount of
16 damage. So, we definitely did the comparison, but we
17 didn't particularly label anything as a control group.

18 CMSR. HONIGBERG: Thank you.

19 CHAIRMAN IGNATIUS: All right. I'm
20 going to resist the temptation to ask about squirrel
21 damage. I've learned from past hearings that you guys
22 love to talk about squirrels. All right. We have no
23 other questions. Any redirect, Mr. Epler?

24 MR. EPLER: No. No thank you.

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1 CHAIRMAN IGNATIUS: Thank you. I do
2 have a question for you. Whether the data request that
3 was distributed you wanted marked as an exhibit? So, it's
4 the March 18, 2014 -- I'm sorry, March 28, 2014 data
5 response.

6 MR. EPLER: It's probably helpful to
7 include it, rather than not. So, I would have no
8 objection to marking that as "Exhibit Number 5". That
9 would be the response to Staff 1-14.

10 CHAIRMAN IGNATIUS: Any objection from
11 OCA or Staff?

12 MS. CHAMBERLIN: No.

13 CHAIRMAN IGNATIUS: All right. We'll
14 mark that then as "Exhibit 5".

15 (The document, as described, was
16 herewith marked as **Exhibit 5** for
17 identification.)

18 CHAIRMAN IGNATIUS: All right. The
19 witnesses are excused. Thank you very much for your
20 testimony. This was helpful.

21 Is there any objection to striking the
22 identification on the five exhibits and making them full
23 exhibits?

24 CHAIRMAN IGNATIUS: Seeing none, we will

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1 do that. Is there anything else to take up before closing
2 statements?

3 (No verbal response)

4 CHAIRMAN IGNATIUS: Seeing nothing,
5 then, Ms. Chamberlin, we'll begin with you.

6 MS. CHAMBERLIN: Thank you. Part of the
7 Settlement Agreement in 10-055 included a stay-out
8 agreement. And, the OCA felt strongly that, because the
9 utility was coming in with this program before the
10 stay-out provision was over, that it affected the whole
11 terms of the Settlement Agreement. At the same time,
12 Staff and the Company were in strong support of the
13 Program, and was recognizing that it was in response to
14 concerns about reliability and extreme weather events.
15 And, because the Pilot had been approved, it was already
16 up and running. And to, you know, to stop it and wait
17 didn't seem to be reasonable. And, so, the agreement that
18 we reached was the one that Mr. Epler presented. And,
19 that is that the allocation that was part of the
20 Settlement Agreement was not continued for this Storm
21 Resiliency Program. And, when it comes again to -- when
22 the stay-out period is over, and they come in for a rate
23 case, we can look at this again, and determine if that
24 allocation is correct. At that time, also we'll have some

1 more data to determine whether or not this is an effective
2 program. The early indication is that it is. So, that is
3 how the OCA came to support the proposal as it was
4 presented here today.

5 CHAIRMAN IGNATIUS: Thank you.

6 Ms. Amidon.

7 MS. AMIDON: Yes. Thank you. I
8 appreciate the chance to state Staff's position on this
9 filing. Staff has reviewed the filing, both the REP/VMP
10 reconciliation portion, the results of the Program, and
11 the Storm Resiliency Pilot Program, and the resulting
12 tariffs. Having reviewed the filing, we support Unitil's
13 filing. And, we do believe that there is merit in making
14 the Pilot Storm Resiliency Program permanent, because we
15 have thoroughly reviewed the Program with the Company, and
16 they clearly have designed the Program to address the
17 concerns of customers to continue to receive, as was
18 discussed, essential services during periods of
19 potentially extended outages.

20 So, therefore, we support the
21 permanent -- the proposal to make the Program on a
22 permanent basis. And, thank you for your attention today.

23 CHAIRMAN IGNATIUS: Thank you. Mr.
24 Epler.

1 MR. EPLER: Yes. Thank you. First, to
2 address the Chairman's question and perhaps suggestion
3 with regard to the Storm Resiliency Program, whether or
4 not there was some in between level between making the
5 program permanent or there was some approval for a lesser
6 number of years. Certainly, while the Company is
7 advocating that it be approved on a permanent basis, we
8 also recognize that there's really nothing in rate-setting
9 that's permanent. And, so, we would anticipate that in
10 the next -- in the Company's next rate proceeding, that we
11 would have to justify this program, as we would any other
12 program.

13 So, clearly, again, as indicated in our
14 initial filing, we'd prefer that it -- that we get the
15 approval on a "permanent" basis. We anticipate being
16 coming before you the next time and justifying it,
17 showing, just as we've shown in this report, the
18 experience. If we happen to have storms between now and
19 then, we'd have more data to be able to show a comparison
20 of circuits.

21 In terms of the overall filing, I just
22 want to acknowledge that this is the last step increase
23 under the Settlement Agreement in Docket 10-055. And,
24 from the Company's perspective, this has been a very good,

1 very workable Settlement Agreement. And, we appreciate
2 the opportunity to work with the Staff and the OCA to put
3 a program in place and a rate program that allowed us to
4 make continual investments over time and to ramp up the
5 Vegetation Program.

6 We acknowledge that we're spending a lot
7 of money on these programs, and there were some
8 significant rate increases associated with this. And, so,
9 the intent was to try to moderate those, the impacts of
10 those by having these increases occur over time.

11 Nonetheless, we do feel very, very strongly that there is
12 significant benefits that we've achieved under this
13 Settlement Agreement and being able to increase both the
14 REP and the VMP programs, and the increases have allowed
15 us to do that. And, we do anticipate that you will see
16 hard data that shows increasing reliability, you know,
17 adjusted for weather events. And, so, we appreciate that.
18 We acknowledge the support that we received from the OCA
19 in this go-around.

20 One of the things that we didn't discuss
21 here, we had the opportunity to conduct a field visit with
22 the OCA. And, we think that that was very helpful in
23 going out and gaining an appreciation of what's involved
24 in these programs. And, the Company is certainly willing,

1 at some future point, whether it's this summer or fall, to
2 offer a field visit to the Commission and any other Staff
3 members, so that you could actually see what we're doing,
4 what's occurring in the field. Because, while the photos
5 are helpful, actually seeing and being able to question us
6 and seeing what's going on in the field, it is sometimes
7 more helpful than anything we can describe in the hearing
8 room.

9 CHAIRMAN IGNATIUS: Thank you.

10 MR. EPLER: Thank you.

11 CHAIRMAN IGNATIUS: All right. If
12 there's nothing further, we will take this under
13 advisement, and appreciate everybody's help today in
14 understanding it. Thank you.

15 **(Whereupon the hearing was adjourned at**
16 **3:21 p.m.)**