

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

Docket No. DE 21-____

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Calendar Year 2020 Storm Fund Report

**DIRECT TESTIMONY
OF
ANTHONY STRABONE
AND
HEATHER M. TEBBETTS**

April 1, 2021



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1 **I. INTRODUCTION AND BACKGROUND**

2 **Q. Mr. Strabone, please introduce yourself.**

3 A. My name is Anthony Strabone, my business address is 9 Lowell Road, Salem, New
4 Hampshire, and I am employed by Liberty Utilities Service Corp. (“LUSC”). I am the
5 Senior Manager of Electrical Engineering for LUSC and I am responsible for the electric
6 capital work plan for Liberty Utilities (Granite State Electric) Corp. (“Liberty” or “the
7 Company”) whereby I manage engineering and construction resources for capital
8 projects.

9 **Q. Please describe your educational background and training.**

10 A. I graduated from Merrimack College in 2004 with a Bachelor of Science degree in
11 Electrical Engineering. I received a Master’s of Business Administration from Southern
12 New Hampshire University in 2006. I received a Project Management Professional
13 (PMP) Certification in 2017 from the Project Management Institute. In 2019, I received
14 my license as a Professional Engineer in the State of New Hampshire.

15 **Q. Please describe your professional background.**

16 A. I joined Liberty in November 2014. Prior to my employment at Liberty, I was employed
17 by Public Service Company of New Hampshire (“PSNH”) as a Substation Supervisor in
18 Substation Maintenance from 2010 to 2014. Prior to my position in Substation
19 Maintenance, I was a Substation Engineer in Substation Engineering from 2008 to 2010
20 and an Engineer in the System and Planning Strategy department from 2004 to 2008.

1 **Q. Have you previously testified before the Commission?**

2 A. Yes, I presented direct and rebuttal testimony and testimony in support of step
3 adjustments in Liberty's recent rate case, Docket No. DE 19-064, and I testified in
4 support of the Company's 2019 step adjustment in Docket No. DE 16-383.

5 **Q. Ms. Tebbetts, please state your full name, business address, and position.**

6 A. My name is Heather M. Tebbetts, my business address is 15 Buttrick Road, Londonderry,
7 New Hampshire, and I am employed by LUSC. I am the Manager of Rates and
8 Regulatory Affairs and am responsible for providing rate-related services for Liberty.

9 **Q. Please describe your educational background and training.**

10 A. I graduated from Franklin Pierce University in 2004 with a Bachelor of Science degree in
11 Finance. I received a Master's of Business Administration from Southern New
12 Hampshire University in 2007.

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

14 A. I joined Liberty in October 2014. Prior to my employment at Liberty, I was employed by
15 PSNH as a Senior Analyst in NH Revenue Requirements from 2010 to 2014. Prior to my
16 position in NH Revenue Requirements, I was a Staff Accountant in PSNH's Property Tax
17 group from 2007 to 2010 and a Customer Service Representative III in PSNH's Customer
18 Service Department from 2004 to 2007.

19 **Q. Have you previously testified before the Commission?**

20 A. Yes, I have testified on numerous occasions before the Commission.

1 **II. PURPOSE OF TESTIMONY**

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

3 A. Liberty is submitting its Calendar Year 2020 Storm Fund Report in compliance with the
4 Settlement Agreement in Docket No. DE 13-063 approved by Commission Order 25,638
5 (Mar. 17, 2014). Consistent with the Settlement Agreement, this report: (1) provides a
6 description of the one Qualifying Storm Event and four Prestaging Weather Events
7 experienced in 2020; (2) provides a summary of the extent of the damage to the
8 distribution system, including the number of outages and length of outages associated
9 with that storm; (3) details the collections credited to the storm fund; and (4) provides the
10 details of any qualifying storm costs that were charged to the fund during calendar year
11 2020. At the request of the Commission Staff, the Company is submitting this filing as
12 the opening documents for a new docket, distinct from Docket No. DE 13-063.

13 **III. 2020 STORM FUND ACTIVITY**

14 **Q. Please describe the storms the Company is looking to include in the storm fund**
15 **deferral account for 2020.**

16 A. There were five storm events in 2020, described below, the costs for which the Company
17 is requesting to include in its storm deferral account.

18 **Q. Has the Company provided the financial information for each storm in this filing?**

19 A. Yes. Attachments 1 and 2 provide the necessary data related to the costs associated with
20 each storm described below. The total prestaging and qualifying costs for 2020 are
21 \$924,662.33. The Company is also including 2017 costs of \$71,157 associated with
22 carryover costs for storms STORM-EXP-1701 and STORM-EXP-1702 that were

1 reviewed by the Commission's Audit Staff in the CY2019 Storm Fund Report, but
2 inadvertently not included in the final audit report. The Company is merely looking to
3 have these costs included in the final report so we can move the costs to the liability
4 account.

5 **Q. Did the Company implement any COVID-19 protocols for prestaging and**
6 **qualifying events?**

7 A. Yes. The state, local, and Company protocols were followed along with CDC guidelines
8 in the event that employees or contractors were needed for prestaging or restoration
9 efforts.

10 **A. April 13, 2020, Wind Storm – Prestaged Event**

11 **Q. Please describe the storm forecast.**

12 A. Beginning around midday Monday, April 13, 2020, Liberty's weather service provider
13 and other weather services began forecasting the potential for gusts between 45 and 60
14 mph in the Salem/Pelham area, along with gusts between 45 and 55 in the Lebanon and
15 Charlestown areas. As such, the Company received an Energy Event Index (EEI) level 3
16 with high confidence as shown in Attachment 3, along with the storm planning report.
17 The storm was expected to start to affect the region between 10:00 a.m. Monday through
18 4:00 a.m. on Tuesday, April 14, with the highest gusts expected between 1:00 p.m.
19 through 9:00 p.m. on April 13.

1 **Q. What preparations did the Company make in anticipation of a major restoration**
2 **event?**

3 A. The Company implemented its Incident Command Structure and mobilized its internal
4 crews and contractor crews (17.5 in total), along with seven contractor tree crews.
5 Customer Service staffed its contact center with customer service representatives in
6 staggered shifts into the evening until the end of the event. Damage assessors and wires
7 down guards were contacted for availability, along with remotely opening the municipal
8 room to provide assistance to towns inquiring about preparations.

9 **Q. Did the Company experience outages during this event?**

10 A. No. While the eastern seaboard took on significant outages, New Hampshire did not see
11 such damage as shown in the map below. Liberty did not have any outages associated
12 with the event.



Q. Does this storm qualify for recovery for prestaging costs?

A. Yes. The Settlement Agreement in Docket No. DE 13-063 provides:

The Company shall be entitled to recover planning and preparation activities in advance of severe weather if the weather forecast for the event shows a Schneider Electric Event Index ("EII") level of 3 or greater with a high probability of occurrence. The activities for which the Company may seek recovery include prestaging of crews, standby arrangements with external contractors, incremental compensation of employees, and other costs that may be incurred to prepare for a qualifying major storm.

Settlement Agreement in Docket No. DE 13-063, Hearing Exhibit 13, at 7.

Q. What qualifying costs are included in this request for recovery?

A. Please see Attachments 1 and 2 for the breakdown of costs. The summary of costs are provided in the table below.

Line No.	Description	Total Pre-Staging Costs
1	Payroll charges including payroll overheads for GSE Employees	\$66,733.05
2		
3	Charges from outside companies	\$43,873.49
4		
5	Charges for Materials and Supplies	\$0.00
6		
7	Charges for employee expenses	\$3,763.46
8		
9	Accrual for outside companies	\$0.00
10		
11	Total	\$114,370.00

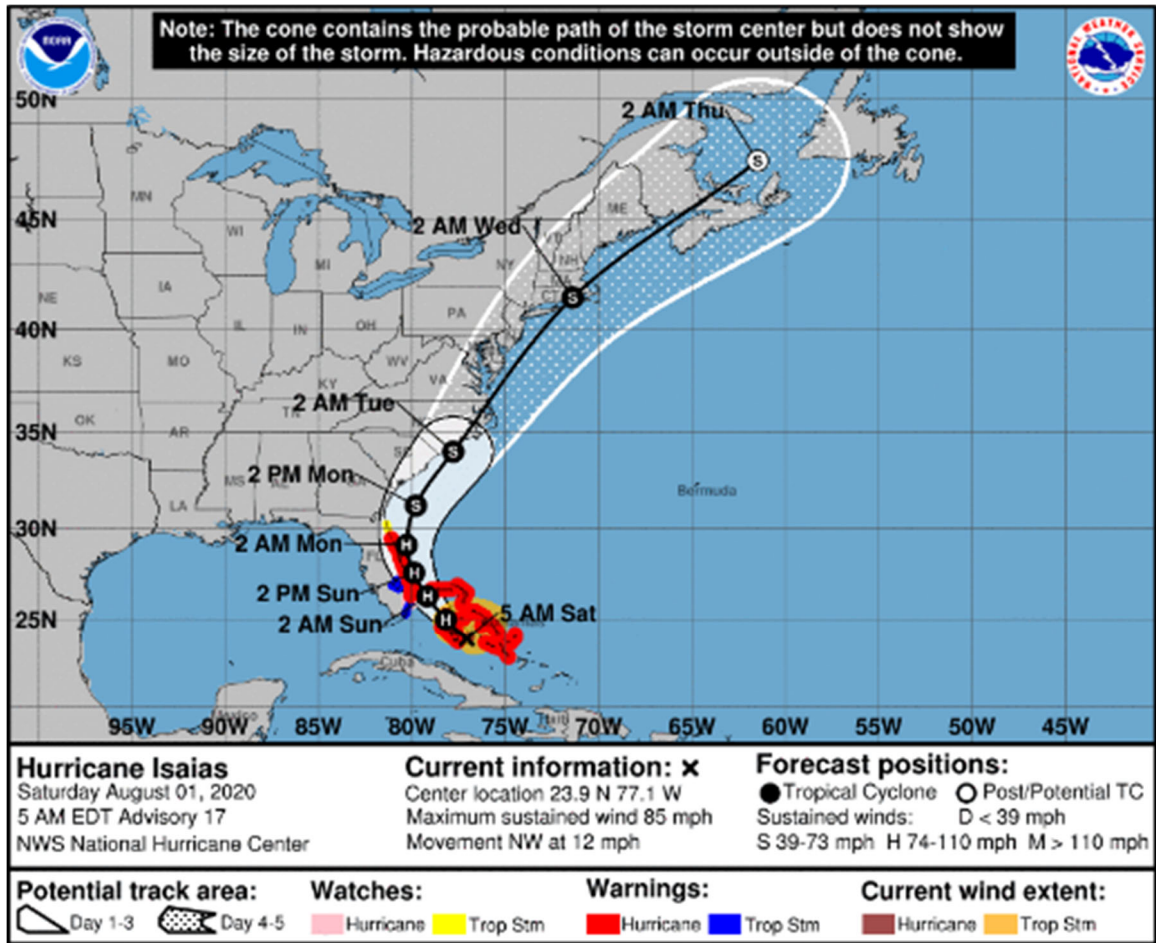
B. Tropical Storm Isaias (August 5, 2020) – Qualifying Event

Q. Please describe the storm forecast.

A. On July 30, 2020, Tropical Storm Isaias formed in Caribbean with potential landfall in the Southeast before re-curving to the northeast ahead of an approaching upper trough and around a high pressure to the east. The expectation was that Tropical Storm Isaias would intensify into a Category 1 hurricane before making landfall in the Southeast. As the next few days ensued, the track of the hurricane was expected to impact the Northeast as a strong tropical storm. DTN forecasted EEI level 2 with medium confidence for sustained winds of 20 to 35 mph and gusts of 38 to 55 mph for the evening of August 4, 2020, through the early morning of August 5, 2020, as provided in Attachment 3.

Q. What preparations did the Company make in anticipation of a major restoration event?

A. The Company started preparations on July 31, 2020, as the first North Atlantic Mutual Aid Group (NAMAG) call was held to determine what resources would be needed throughout the Mid-Atlantic region up through the Northeast. Given the projected path of the hurricane, shown below, staging crews from the East would be virtually impossible as they were needed in their home territories. In the meantime, the Company secured six local contractor crews, along with putting internal crews on property for the overnight period. Customer Service staffed its contact center with customer service representatives in staggered shifts until the end of the event. Damage assessors and wires down guards were contacted for availability, along with remotely opening the municipal room to provide assistance to towns inquiring about preparations.



Q. Did the Company experience outages during this event?

A. Yes. The table below provides the summary of reliability indices for this event and Attachment 3 provides further details of the outage impacts.

Aug. 4 th – Aug. 5 th	Events	Customer Interrupted	Cust. Minutes Interrupted	Customers Served	SAIDI	SAIFI	CAIDI
PUC Major Event	67	4,749	1,549,400	44,989	34.44	0.11	326.26

Q. Does this storm qualify for recovery for qualifying storm costs?

A. Yes. The system encountered 67 events during the storm period. The Settlement Agreement in Docket No. DG 06-107 provides:

Total O&M costs of qualifying "major" storms will be charged to the fund. As indicated in Exhibit GSE-7 of the Granite State Rate Plan, the NHPUC definition of "major" storms will be used to qualify storms. For Granite State this is defined as a severe weather event or events causing 30 concurrent troubles and 15% of customers interrupted, or 45 concurrent troubles. Troubles are defined as interruption events occurring on either primary or secondary lines.

Settlement Agreement in Docket No. DG 06-107, Hearing Exhibit 3, at 67.

Q. What qualifying costs are included in this request for recovery?

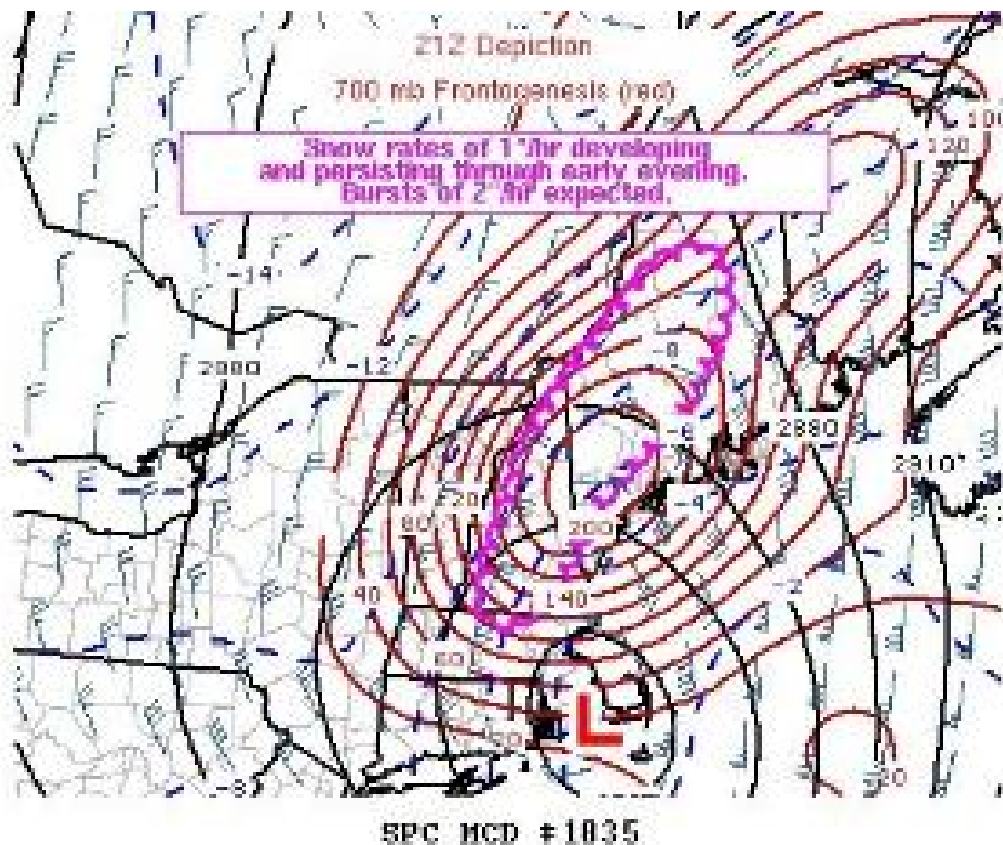
A. Please see Attachments 1 and 2 for the breakdown of costs. The summary of costs are provided in the table below.

Line No.	Description	Total Pre-Staging Costs
1	Payroll charges including payroll overheads for GSE Employees	\$ 225,349.96
2		
3	Charges from outside companies	\$ 110,474.31
4		
5	Charges for Materials and Supplies	\$ 2,339.17
6		
7	Charges for employee expenses	\$ 2,718.08
8		
9	Accrual for outside companies	\$ -
10		
11	Total	<u>\$ 340,881.52</u>

C. December 5, 2020, Nor'easter - Prestaging

Q. Please describe the storm forecast.

A. Beginning around late morning Saturday, December 5, 2020, Liberty's weather service provider and other weather services began forecasting the significant snowfall from a Nor'easter expected to affect New England with heavy snowfall, up to two inches per hour and potentially dangerous winds.



The forecast for the Salem/Pelham area called for 7 to 14 inches of snow with snow-to-liquid ratios of 6:1 to 9:1. According to the National Weather Service, this would qualify the snow as "wet," and storms in previous years with wet snowfall have proven to heavily

1 damage the Company's distribution system. DTN issued an EEI level 3 with high
2 confidence for snowfall for the Salem/Pelham area.

Snow to Liquid Ratio

Gives a representation of how wet, normal, or dry a snow will be.

Example: 11 to 1 means for every inch of liquid that falls, 11 inches of snow can be expected.

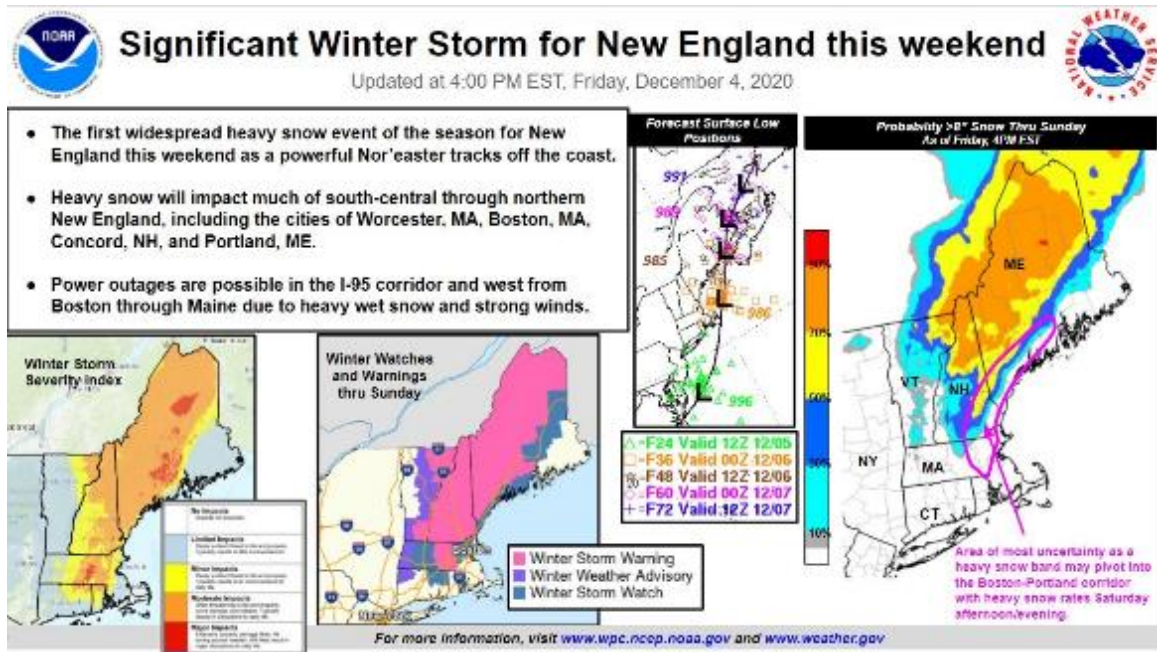
Red Shading (Wet Snow): Snow ratio of 1-10 to 1.

Green Shading (Normal Snow): Snow ratio of 10-16 to 1.

Blue Shading (Dry Snow): Snow ratio of 16+ to 1.

3
4 **Q. What preparations did the Company make in anticipation of a major restoration**
5 **event?**

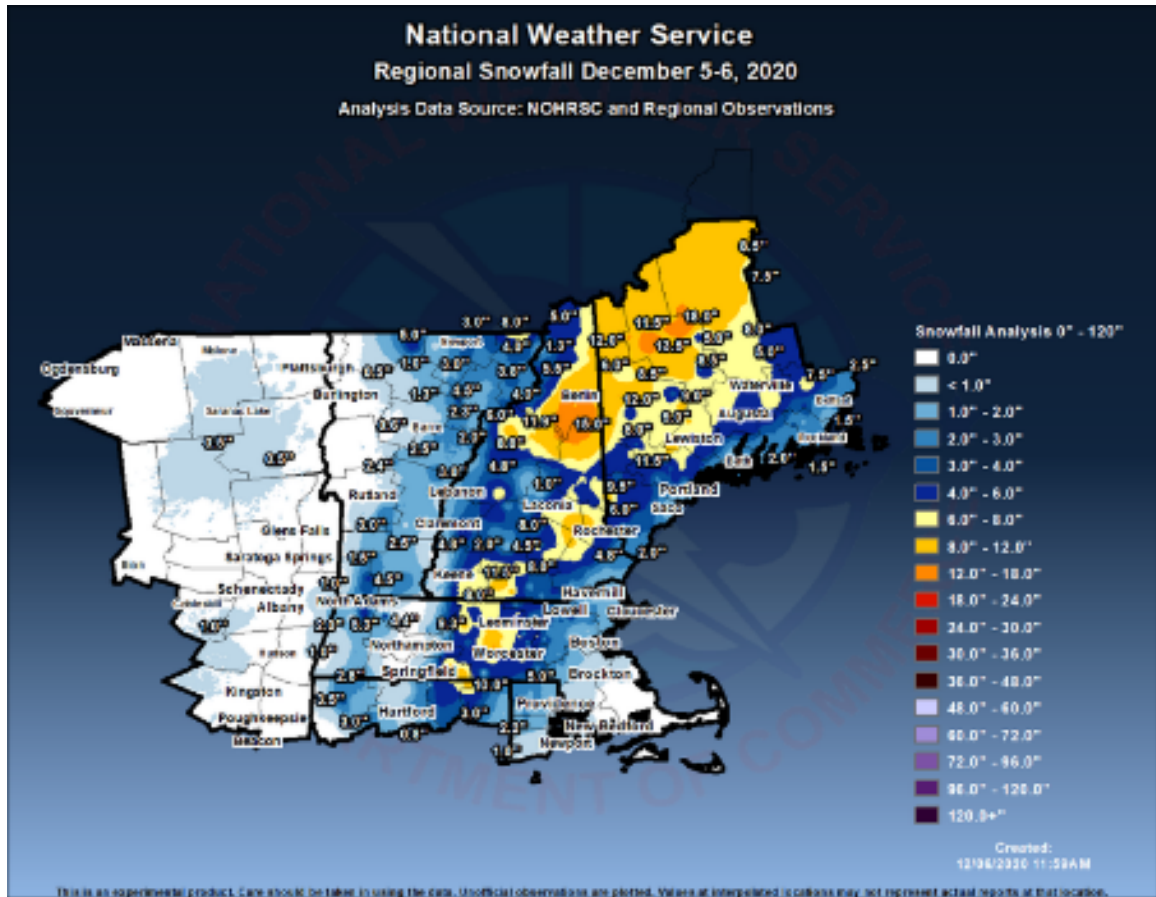
6 A. The Company implemented its Incident Command Structure and mobilized its internal
7 crews, along with fifteen contractor crews and ten tree crews. Customer Service staffed
8 its contact center with customer service representatives in staggered shifts until the end of
9 the event. Damage assessors and wires down guards were contacted for availability,
10 along with remotely opening the municipal room to provide assistance to towns inquiring
11 about preparations. The planning report provided in the filing was created and sent to the
12 ICS prior to the event, thus the full complement of crews at the time the report was
13 created shows fewer crews than the Company retained. Please see Attachment 3 for the
14 report. The Company was able to secure additional crews after the report was sent out,
15 thus the full complement of contractor crews are not shown in the report.



1

2 **Q. Did the Company experience outages during this event?**

3 A. No. While the snowfall from many different weather outlets predicted heavy and
4 significant snowfall totals, the map below provides the observed snowfall from the storm.



Q. Does this storm qualify for recovery for prestaging costs?

A. Yes. As previously described, this storm met the qualifications for prestaging under the Settlement Agreement in Docket No. DE 13-063.

Q. What qualifying costs are included in this request for recovery?

A. Please see Attachments 1 and 2 for the breakdown of costs. The summary of costs are provided in the table below.

Line No.	Description	Total Pre-Staging Costs
1	Payroll charges including payroll overheads for GSE Employees	\$ 87,952.28
2		
3	Charges from outside companies	\$ 147,897.15
4		
5	Charges for Materials and Supplies	\$ -
6		
7	Charges for employee expenses	\$ 4,759.63
8		
9	Accrual for outside companies	\$ -
10		
11	Total	<u>\$ 240,609.06</u>

D. Winter Storm Gail, December 16, 2020 - Prestaging

Q. Please describe the storm forecast.

A. Beginning around late evening Wednesday, December 16, 2020, Liberty's weather service provider and other weather services began forecasting the significant snowfall from a Nor'easter expected to affect New England.

The forecast for the Salem/Pelham area called for 9 to 13 inches of snow, up to 13 to 17 inches, with wind gusts between 35 to 40 mph. DTN issued an EEI level 3 with high confidence for snowfall for the Salem/Pelham area. In addition to significant snowfall in Southern New Hampshire, the Company's Lebanon and Charlestown areas expected a greater amount of snow, up to 19 inches, and DTN issued an EEI level 3 with high confidence for those areas as well, as shown in Attachment 3. The picture below provides the National Weather Service's expectations of the storm's effects.



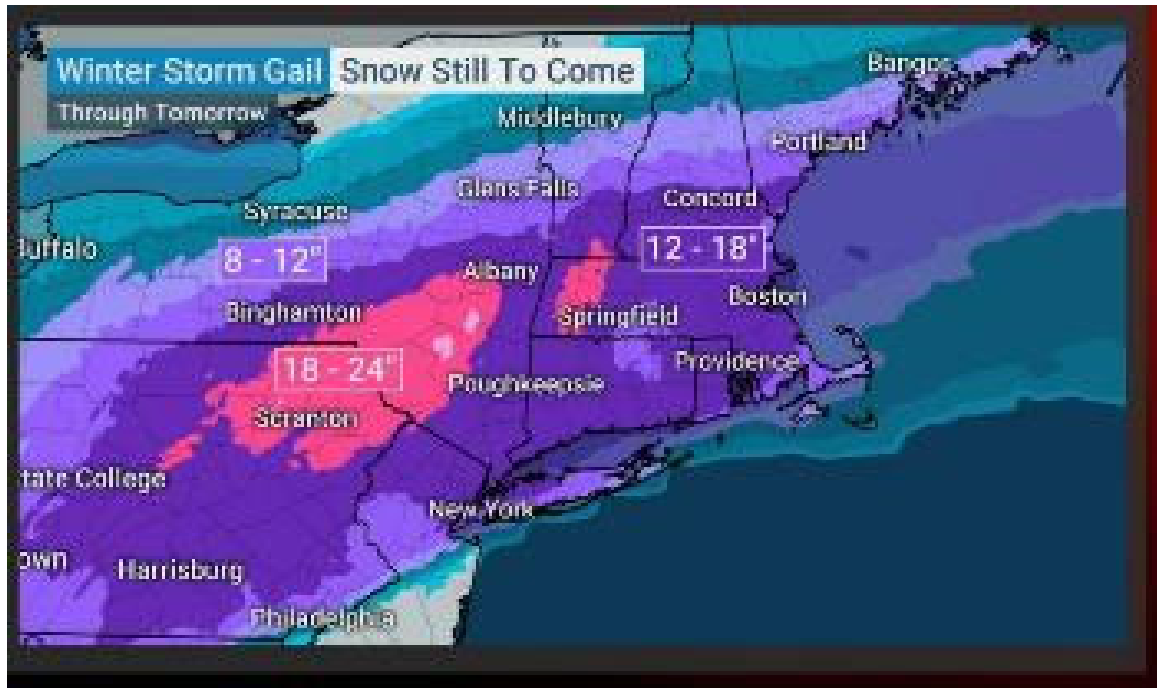
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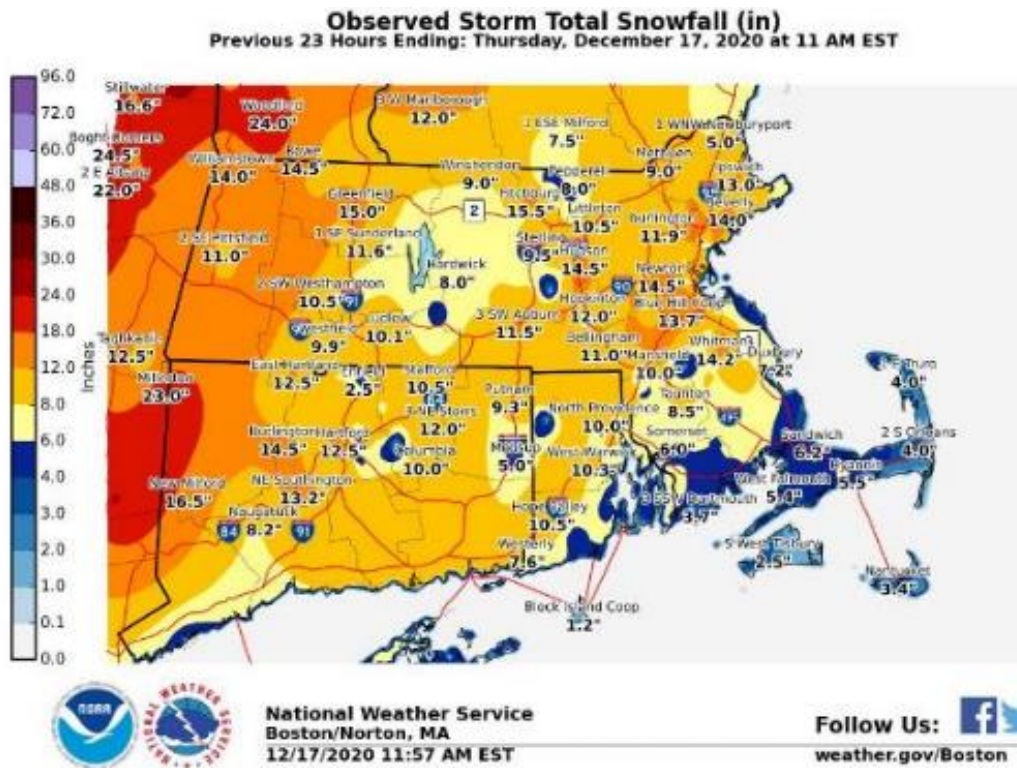
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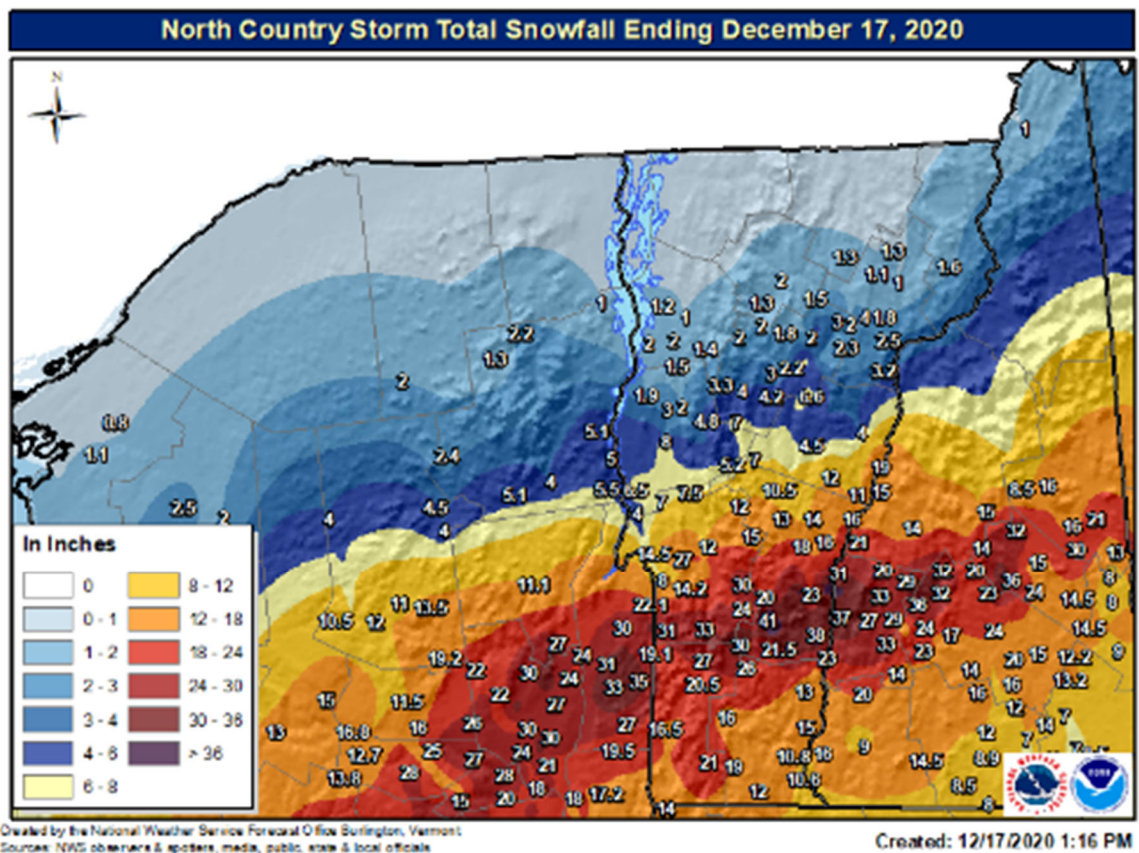
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1



2



Q. Does this storm qualify for recovery for prestaging costs?

A. Yes. As previously described, this storm met the qualifications for prestaging under the Settlement Agreement in Docket No. DE 13-063.

Q. What qualifying costs are included in this request for recovery?

A. Please see Attachments 1 and 2 for the breakdown of costs. The summary of costs are provided in the table below.

Line No.	Description	Total Pre- staging Costs
1	Payroll charges including payroll overheads for GSE Employees	\$ 44,840.96
2		
3	Charges from outside companies	\$ 87,189.53
4		
5	Charges for Materials and Supplies	\$ -
6		
7	Charges for employee expenses	\$ 2,823.54
8		
9	Accrual for outside companies	\$ -
10		
11	Total	<u>\$ 134,854.03</u>

E. Christmas Windstorm December 25, 2020 - Prestaging

Q. Please describe the storm forecast.

A. Beginning around late evening Thursday, December 24, 2020, Liberty's weather service provider and other weather services began forecasting the significant wind gusts from a storm expected to affect New England with potentially dangerous winds.

The forecast for the Salem/Pelham area called for gusts potentially reaching 50 to 60 mph through Friday morning, Christmas Day, and as such DTN issued an EEI level 3 with high confidence for wind gusts for the Salem/Pelham area. WMUR noted the potential for power outages, along with the NWS forecast which predicted gusts around 46 mph in the Salem/Pelham area with a high wind watch, as shown below.

CHRISTMAS RAINSTORM

TONIGHT - FRIDAY

Heavy Rain: 1.5-2.5"
May Cause Flooding, Big Puddles

Winds Gust To 40-50+ MPH
High Wind Watch SE

Be Ready For Power Outages

1

Daily Decision Support Briefing

Gray/Portland, ME
WEATHER FORECAST OFFICE

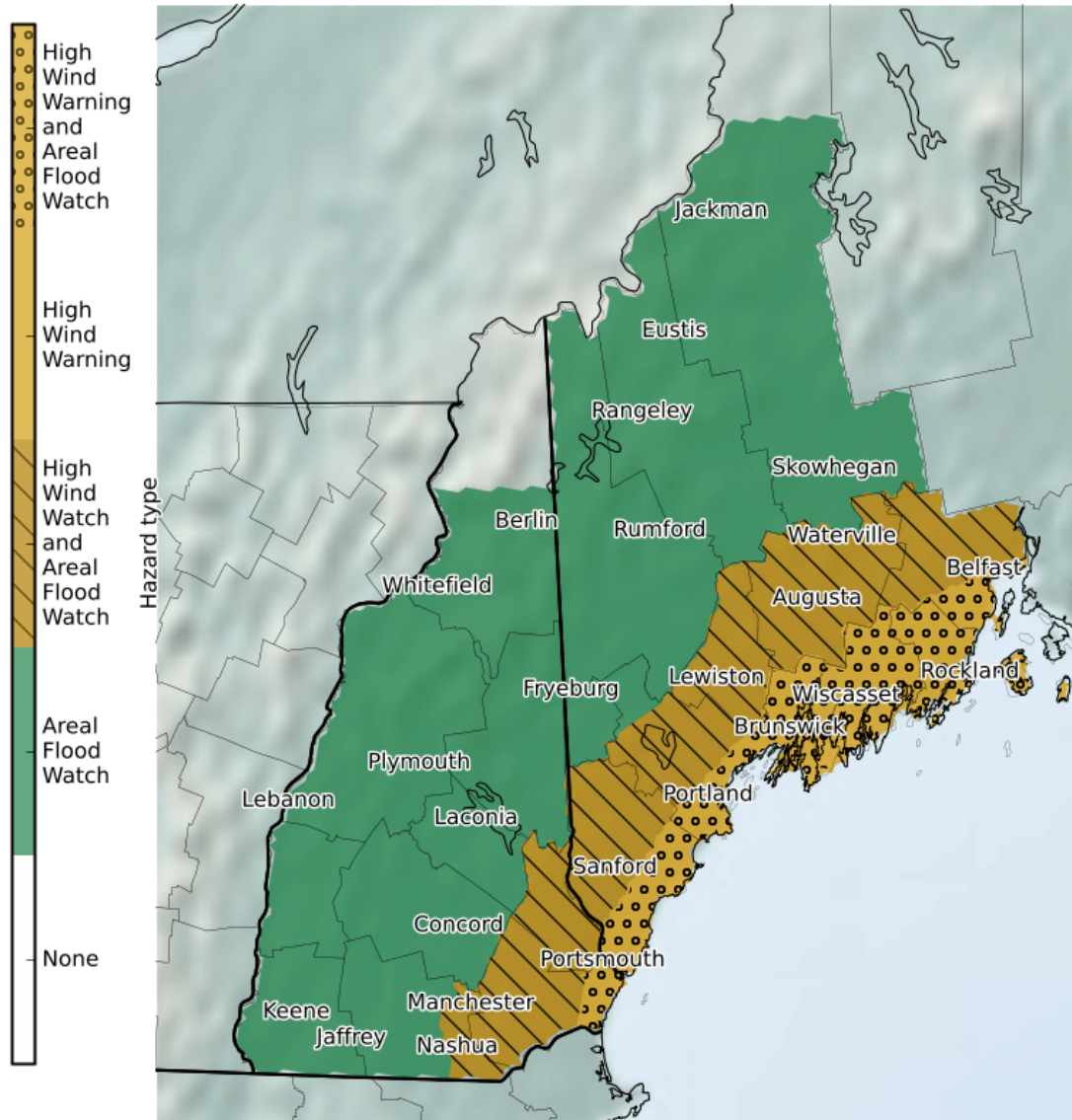
Maximum Wind Gusts On Friday	What To Expect	
	<p>Heavy rain and strong winds expected late tonight and Friday.</p> <ul style="list-style-type: none"> ✓ Moderate river and stream flooding expected due to the combination of snow melt and heavy rainfall. ✓ Street flooding likely where storm drains are clogged with snow/ice. ✓ Locally damaging winds expected late tonight and Friday, especially near the coast. <ul style="list-style-type: none"> ✓ Some power outages are likely. ✓ Locally dense fog possible tonight into Friday. ✓ Splash over possible Friday morning. 	
	See Related Pages	Flood, Wind, Coastal Flood, Marine

ISSUED: 12/24/2020 3:24 AM
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2

Watches, Warnings and Advisories

Valid: 12/24/2020 10:00 PM - 12/25/2020 04:00 PM EST



National Weather Service
Gray Maine

12/24/2020 10:12 AM EST

Follow Us:   

weather.gov/Gray

1 **Q. What preparations did the Company make in anticipation of a major restoration**
2 **event?**

3 A. With the event occurring in the overnight hours on Christmas Eve, the Company
4 implemented its Incident Command Structure and mobilized its internal crews and
5 contractor crews (12 in total), along with eight contractor tree crews. Damage assessors
6 and wires down guards were contacted for availability, along with remotely opening the
7 municipal room to provide assistance to towns inquiring about preparations, as shown in
8 the storm planning report in Attachment 3.

9 **Q. Did the Company experience outages during this event?**

10 A. No. While the wind gusts from many weather outlets prescribed potential power outages,
11 the Company's system did not take on any issues.

12 **Q. Does this storm qualify for recovery for prestaging costs?**

13 A. Yes. As previously described, this storm met the qualifications for prestaging under the
14 Settlement Agreement in Docket No. DE 13-063.

15 **Q. What qualifying costs are included in this request for recovery?**

16 A. Please see Attachments 1 and 2 for the breakdown of costs. The summary of costs are
17 provided in the table below.

Line No.	Description	Total Pre- staging Costs
1	Payroll charges including payroll overheads for GSE Employees	\$ 21,039.20
2		
3	Charges from outside companies	\$ 75,275.36
4		
5	Charges for Materials and Supplies	\$ -
6		
7	Charges for employee expenses	\$ 166.21
8		
9	Accrual for outside companies	\$ -
10		
11	Total	<u>\$ 96,480.77</u>

1

2 **IV. CONCLUSION**3 **Q. Does this conclude your testimony?**4 **A. Yes.**