

STATE OF NEW HAMPSHIRE
BEFORE THE
NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DOCKET NO. DE 24-____
REGULATORY RECONCILIATION ADJUSTMENT
Vegetation Management and Reliability Reports

DIRECT TESTIMONY OF

ROBERT D. ALLEN

IAN J. FARLEY
ELLI NTAKOU
ADAM V. MIERZWA

On behalf of Public Service Company of New Hampshire

d/b/a Eversource Energy

March 1, 2024

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1 **I. INTRODUCTION**

2 **Q. Mr. Allen, please state your full name, position, and business address.**

3 A. My name is Robert D. Allen. I am employed by Eversource Energy Service
4 Company (“ESC”) as Manager of Coordination, Strategy, and Innovation for
5 Vegetation Management across the three state Eversource territory. In that role I
6 provide support to Public Service Company of New Hampshire d/b/a Eversource
7 Energy (“Eversource” or the “Company”). My business address is 780 N.
8 Commercial Street Manchester, New Hampshire.

9 **Q. Please summarize your educational background.**

10 A. I have an Associate of Science in Arboriculture from Stockbridge School of

1 Agriculture, University of Massachusetts, Amherst, Massachusetts.

2 **Q. Please summarize your professional experience.**

3 A. I was promoted to my current position in January 2024 and am responsible for
4 enhancing and driving consistency for our Vegetation Management programs
5 internally, while also representing Vegetation Management in external relations
6 with customers, municipalities, and industry organizations. Previously I was
7 Manager of Vegetation Management from 2013 to January 2024. From 2009 to
8 2013, I held the position of Supervisor of Vegetation Management for the
9 Company. From 1992 to 2009, I was Arborist for the Company's affiliate, The
10 Connecticut Light and Power Company. Overall, I have approximately 40 years of
11 experience in Arboriculture.

12 **Q. Have you previously testified before the New Hampshire Public Utilities**
13 **Commission?**

14 A. Yes, I have testified before the New Hampshire Public Utilities Commission (the
15 "Commission") in Eversource's last Reliability Enhancement Program ("REP")
16 submission in Docket No. DE 18-177, Eversource's most recent rate case in Docket
17 No. DE 19-057, and in support of the Company's Regulatory Reconciliation
18 Adjustment ("RRA") filings in Docket Nos. DE 21-029, DE 22-022, and DE 23-
19 021.

20 **Q. Mr. Farley, please state your full name, position, and business address.**

1 A. My name is Ian J. Farley. I am employed by ESC as Supervisor of Vegetation
2 Management. In that role I provide support to the Company. My business address
3 is 780 N. Commercial Street Manchester, New Hampshire.

4 **Q. Please summarize your educational background.**

5 A. I have a Bachelor of Science degree in Forest Operations Science from the
6 University of Maine, Orono, Maine.

7 **Q. Please summarize your professional experience.**

8 A. Since joining the Company, I have worked for over eight years with the Vegetation
9 Management Group and currently hold the title of Supervisor, Vegetation
10 Management.

11 **Q. Have you previously testified before the New Hampshire Public Utilities
12 Commission?**

13 A. No, I have not.

14 **Ms. Ntakou, please state your full name, position, and business address.**

15 A. My name is Elli Ntakou. I am employed by ESC as the Manager of System
16 Resilience and Reliability Planning. My business address is 247 Station Drive,
17 Westwood, Massachusetts.

18 **Q. What are your principal responsibilities in this position relevant to this filing?**

19 A. As the Manager of System Resilience and Reliability Planning, I am responsible
20 for Eversource's reliability and resilience programs for its electrical infrastructure.

1 The Company's efforts focus on assessing a wide portfolio of reliability and
2 resilience solutions, and prioritizing, optimizing, and granularly targeting those
3 solutions to its T&D grid needs based on historical data, data forecasts, and
4 engineering models. Resilience and reliability planning is critical on Eversource's
5 path to a modern and decarbonized grid and to continue to provide reliable electric
6 service to customers in the face of climate change.

7 **Q. Please summarize your professional experience and educational background.**

8 A. I graduated from Boston University College of Engineering with a Master of
9 Science and a PhD, both in Systems Engineering. Subsequently, I worked for ESAI
10 Power LLC, leading their Northeast wholesale power market modeling efforts.
11 From 2018 and until July 2022, I was employed by Quanta Technology, in various
12 positions, the most senior being Senior Advisor. As part of that role, I advised a
13 breadth of clients in the power sector on various topics, including resilience and
14 reliability, non-wires alternatives, storage use-cases and integration, grid
15 modernization, and scenario planning. In July 2022, I joined ESC as the Manager
16 of System Resilience and Reliability Planning.

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

18 A. Yes, I have. I testified in the Company's most recent RRA docket, DE 23-021.

19 **Q. Mr. Mierzwa, please state your full name, position, and business address.**

20 A. My name is Adam V. Mierzwa. I am employed by ESC as Director-Distribution
21 Engineering. My business address is 780 North Commercial Street, Manchester,

1 New Hampshire.

2 **Q. What are your principal responsibilities in this position?**

3 A. As the Director-Distribution Engineering, I am responsible for optimizing the
4 performance of the distribution system assets in New Hampshire that are operated
5 by the Company and to ensure customer needs for service and reliability are
6 satisfied.

7 **Q. Please summarize your professional experience and educational background.**

8 A. I graduated from Florida Institute of Technology with a Bachelor of Electrical
9 Engineering, and received a Masters of Science in Project Management and
10 Operations from Southern New Hampshire University. From 2014-2022, I worked
11 for Southern Maryland Electric Cooperative (SMECO) in multiple Substation and
12 Distribution Engineering and leadership roles. At SMECO I lead multiple
13 Distribution capital enhancement programs, to include Privatization Project
14 Manager for the Department of the Navy. I was also responsible for the Asset
15 Management and Workflow System. In December 2023, I joined Eversource in the
16 role of Distribution Engineering Director for New Hampshire.

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

18 A. I have not; however, I have previously testified before the Maryland Public Service
19 Commission (PSC).

20 **Q. What is the purpose of your joint testimony?**

1 A. The purpose of our testimony is to present the Company’s reports on its vegetation
2 management and reliability performance for calendar year 2023, as required by
3 Section 9.3 of the comprehensive settlement in the Company’s most recent rate
4 case, Docket No. DE 19-057, which was approved by the Commission in Order No.
5 26,433 issued on December 15, 2020 (the “Settlement”). Specifically, the
6 Settlement set out the requirements for a series of reports and information to be
7 filed by March 1st of each year as the first step in the Company’s annual RRA
8 filing. This testimony accompanies these required reports.

9 **Q. Would you please describe the specific reports that are included?**

10 A. Yes. Section 9.3 of the Settlement states:

11 By March 1 of each year the Company shall submit a filing
12 containing reports on PSNH’s reliability statistics and vegetation
13 management activities, and requesting the Commission open a new
14 docket to consider the filing and other RRA issues. Such reports
15 shall include information on reliability and vegetation management
16 activities similar to information historically included in the
17 Company’s Reliability Enhancement Plan filings. Further detail
18 regarding the report contents is provided in Appendix 4. The
19 Company shall also include as part of this annual filing the proposed
20 adjustment to the August 1 RRA associated with prior calendar year
21 vegetation management activities, as described in Section 9.1(b)
22 above.

23
24 In line with that requirement, this testimony includes the reports identified in
25 Appendix 4 to the Settlement.

26 **Q. Are you presenting any attachments in addition to your testimony?**

27 A. Yes, we are presenting the following attachments in support of this testimony:

Attachment	Description
Attachment RDA/IJF/EN/AVM-1	2023 Vegetation Management Plan and Performance Report
Attachment RDA/IJF/EN/AVM-2	2024 Vegetation Management Plan Proposal
Attachment RDA/IJF/EN/AVM-3	Reliability Report

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We note that Attachment RDA/IJF/EN/AVM-2 includes the Company’s 2024 vegetation management plan proposal, which is not among the reports identified in Appendix 4 to the Settlement. However, the Company provided a 2021 vegetation management plan as part of its 2021 RRA filing (submitted on March 1, 2021 in Docket No. DE 21-029), a 2022 vegetation management plan as part of its 2022 RRA filing (submitted on March 1, 2022 in Docket No. DE 22-010), and a 2023 vegetation management plan as part of its 2023 RRA filing (submitted on March 1, 2023 in Docket No. DE 23-021). In the interest of consistency, and to aid the Commission’s review of the Company’s vegetation management activities, the 2024 Vegetation Management Plan, as filed in Docket No. DE 19-057 on November 15, 2023, is included here.

1 **Q. How is your testimony organized?**

2 A. In addition to this introductory section, our testimony is organized into the
3 following sections:

- 4 • Section II provides an overview of Eversource’s vegetation management
5 program (“VMP”), including its key initiatives, objectives, and
6 performance;
- 7 • Section III discusses the Company’s vegetation management activities and
8 performance in 2023;
- 9 • Section IV discusses the Company’s vegetation management activities plan
10 for 2024;
- 11 • Section V discusses the Company’s reliability performance in 2023; and
- 12 • Section VI provides the conclusion to our testimony.

13 Mr. Allen and Mr. Farley are primarily responsible for Sections II, III, and IV. Ms.
14 Ntakou and Mr. Mierzwa are primarily responsible for Section V.

15 **II. VEGETATION MANAGEMENT PROGRAM**

16 **Q. Mr. Allen and Mr. Farley, what is the overall design of the vegetation**
17 **management work performed under the Eversource VMP?**

18 A. As discussed in the Company’s Settlement and in Docket Nos. DE 21-029,
19 DE 22-010, and DE 23-021, the Eversource VMP is structured as a comprehensive
20 effort involving multiple departments and significant amounts of data analysis. The
21 plan is coordinated on an individual circuit basis with the distribution engineering

1 group and targets specific areas to improve reliability and resiliency. The execution
2 of the actual tree work is managed by Eversource’s Vegetation Management
3 Department utilizing a staff of Company arborists, contract arborists, and tree
4 trimming and removal contractors. The program covers all primary wires, with
5 scheduling developed on the basis of a combination of performance and circuit-
6 specific cycle-based trimming.

7 There are four aspects of the VMP. First, the program includes Scheduled
8 Maintenance Trimming (“SMT”), which follows an established trim cycle to ensure
9 that all circuits, regardless of current performance, are trimmed at least once every
10 four to five years, subject to circuit-specific considerations. Second, the Company
11 performs Enhanced Tree Trimming (“ETT”) to manage vegetation along the main
12 backbone of the circuit. In contrast to SMT, ETT expands the zones of tree pruning
13 activity to create additional clearances between tree growth and electrical facilities.
14 With respect to ETT, the Company employs reliability-based prioritization methods
15 to schedule vegetation management activity on specific circuits. The Company
16 targets up to 100 miles per year on circuits with the worst tree-related reliability
17 experienced in the previous year (i.e., the top 50 list). If the Company determines
18 that a poorly performing circuit is scheduled to be included in the SMT cycle for
19 that year, the Company will consider including the circuit backbone under ETT.

20 Third, the VMP includes hazard tree removal. The hazard tree removal program
21 works in parallel with the SMT cycle. It involves the review of SMT circuits to

1 identify and complete the emergent removal of trees determined to be in ill-health,
2 or that otherwise pose a threat to electrical facilities or public safety, both within
3 and outside standard trimming zones. The Company seeks to remove trees that are
4 identified by trained arborists as a hazard to primary conductors. It is best practice
5 and prudent to remove the dead, diseased and/or dying trees while trimming the
6 SMT circuit and to include those trees in the hazard tree removal program, as the
7 Company typically will not revisit that circuit for another four to five years.

8 Lastly, the fourth component of the VMP is full-width rights-of-way (“ROW”)
9 clearing. The Company researches its easements to confirm the easement
10 boundaries and then works to clear the ROW to the full extent allowed under the
11 easement. More specifically, full-width ROW clearing involves the reclamation of
12 existing ROW by the enhanced clearing of trees and brush to extend the clearances
13 between vegetation and the Company's electrical facilities located in those ROWs.

14 **Q. What are the program specifications for SMT?**

15 A. The SMT is conducted on a four- to five-year cycle and the clearance specifications
16 are 8 feet to the side, 15 feet above, and 10 feet below. This work is competitively
17 bid to ensure it is performed in a cost-effective manner. The Company enters into
18 longer term contracts for SMT work to ensure that contractor crew resources are
19 available to do the work. The SMT is the core of the VMP and there are
20 approximately ninety crews on the Company’s distribution system every day
21 performing this critical baseline clearance work.

1 **Q. What are the specifications for ETT and hazard tree removal?**

2 A. As noted above, the ETT is focused on circuit backbones and the specifications are
3 10 feet to the side from “ground-to-sky,” although there can be equipment
4 limitations that prevent workers from safely achieving the full clearance. This
5 strategic clearance program targets overhanging branches that could break and fall
6 onto the Company’s power lines.

7 The ETT work is released for competitive bid annually and over the past decade
8 this work has been awarded to five different tree contractors. The ETT work is
9 discussed in-person with impacted tree owners before any work is commenced.
10 There are occasions where the ETT clearance work is not or cannot be achieved for
11 reasons that can include, but are not limited to: tree owner refusal of the proposed
12 work, equipment limitations, geographic limitations, logistics, or access.

13 Hazard tree removal is conducted in parallel with scheduled cycle miles and priority
14 is placed on identifying risk and hazard trees along the three-phase primary, or
15 circuit backbone, for removal. The Company may also evaluate single- and two-
16 phase lateral primary for hazard tree removal if the area has been identified as poor
17 performing or during the performance of SMT work.

18 **Q. Does the Company monitor the performance of its vegetation management**
19 **contractors to ensure compliance with the Company’s specifications?**

20 A. Yes. The Company routinely audits all vegetation management work performed
21 on its system and reviews contractor work for adherence to the standards for

1 vegetation management. Arborists conduct field reviews of all work areas and
2 document any areas of non-compliance by location, correlating the locations onto
3 circuit maps. This information is sent to the contractors performing the work and
4 they are required to complete any necessary re-work in accordance with the
5 standards. All SMT miles are audited for quality control annually. In the event
6 proper clearances have not been achieved, the contractor is responsible for re-
7 trimming at no additional cost for a period of 12 months.

8 **III. 2023 VEGETATION MANAGEMENT PROGRAM**

9 **Q. Mr. Allen and Mr. Farley, please explain the Company's vegetation**
10 **management activities for 2023 and its performance.**

11 A. As reflected in Attachment RDA/IJF/EN/AVM-1, the Company trimmed 2,475
12 miles of SMT/METT¹ in 2023 at a cost of \$25,689,706. The original budgeted
13 miles were 2,399 miles. Eversource successfully executed its SMT/METT miles
14 to keep the Company on track for meeting the cycle trimming requirements of the
15 Commission.

16 Within Attachment RDA/IJF/EN/AVM-1, the Company has also included
17 information on its ETT, Hazard Tree Removal, and ROW clearing activities,
18 including the 2023 plan budget, as filed on March 1, 2023 in Docket No. DE 23-
19 021 as Attachment RDA/EN/RDJ-2, and the 2023 actual costs incurred for those
20 programs, as well as the amount of work completed.

¹ "METT" is maintenance trimming performed on miles that were previously subject to ETT, with the amount of METT changes each year based on the circuit schedule.

1 **Q. Has the Company noticed an increasing number of hazard trees on its system?**

2 A. Yes. The Company continued to find that trees in New Hampshire have been
3 impacted by many biotic factors over the last several years. These issues primarily
4 include repeated drought years, Emerald Ash Borer, Spongy Moth, Hemlock Woolly
5 Adelgid, Hemlock Looper, Elongate Hemlock Scale, and White Pine Needle
6 Disease, as well as the residual effect of the listed factors. Such issues will mean
7 more trees that are standing dead or in declining health along the roadside forest.
8 The Company believes that adherence to a well-designed maintenance cycle, along
9 with an aggressive hazard tree removal program, are key components to a successful
10 and reliable VMP.

11 **Q. Did Eversource experience any resource constraints during 2023?**

12 A. Yes. As discussed in previous RRA dockets, retaining sufficient resources remains
13 an ongoing challenge. Following the pandemic, there were fewer crews available
14 in New Hampshire. The price points at neighboring New England utilities were
15 higher than the contracted prices on the Company's New Hampshire system. As a
16 result, tree contractors found the work on the Company's system to be less
17 profitable than on other utilities' systems.

18 In addition, while Eversource currently has sufficient experienced professionals
19 managing its VMP, there are longer-term concerns with the trained work force.
20 There continue to be limited existing qualified resources in New England, with very
21 few programs in high school or college that focus on the Arboriculture/Forestry

1 fields. These limitations result in an extremely competitive market with a material
2 impact on costs, and have had a direct impact on the availability of trained
3 individuals the Company can utilize to implement its VMP, as seen in recent
4 competitive bids.

5 **Q. Has the Company taken any steps to address these resource constraints?**

6 A. Yes. In the interest of trying to expand the pool of qualified people to perform this
7 work, Eversource has encouraged its tree contractors to host job fairs and increase
8 their social media presence. The Company has also asked its contractors to explore
9 new and different types of tree clearing/trimming equipment to be used on
10 scheduled work. Currently, however, the new contracts have put significant
11 pressure on the budgets for 2024 and thereafter, and will likely result in significant
12 adjustments to the Company's plans in the future to assure that the SMT continues
13 to meet the Commission's requirements.

14 **Q. Did resource constraints have any impact on the Company's efforts in**
15 **carrying out the 2023 planned activities?**

16 A. The crew resource constraints discussed above that have impacted Vegetation
17 Management ("VM") over the last few years continued to be an issue in 2023.
18 These resource constraints left the Company with fewer crews than originally
19 planned for 2023 work.

20 In addition, the Company began 2023 with a backlog of VM work from 2022. This
21 backlog was the result of storm restoration efforts and severe weather. In 2022,

1 several major storm events resulted in VM crews being deployed for restoration
2 efforts. These are the same crews that perform work under the VMP. As a result,
3 the 2022 restoration efforts created a backlog of VM work for 2023.

4 To address this backlog, the Company's first quarter 2023 strategy was to focus on
5 hazard trees that had the greatest risk of impacting customer reliability that were
6 not addressed in December 2022 due to storm restoration efforts and resource
7 constraints. In addition to addressing this backlog of hazard tree removals, the
8 Company continued to focus on its SMT activities.

9 In order to ensure that adequate mileage would be completed in 2023, the Company
10 transitioned most of its crews to SMT/METT in the second and third quarters of
11 2023. This action reduced the investment on hazard tree removal for several
12 consecutive months. The Company did initially ramp back up its hazard tree
13 removals in the fourth quarter of 2023 with the intent of completing all hazard tree
14 removals by year end. However, the Company did not fulfill its VMP investment
15 strategy for hazard tree removals due to storm restoration efforts in December 2022.

16 As discussed above, the Company did complete all SMT miles.

17 **Q. Have you included an adjustment pursuant to Settlement Section 6.2(c), which**
18 **allows Eversource to include a carryover adjustment to the August 1 RRA**
19 **associated with prior calendar year VM activities?**

20 A. Yes. In Docket No. DE 23-021, the Company proposed and the Commission
21 approved the transfer and application of the actual calendar year 2022 VMP over-
22 recovery amount of \$2,126,381 to serve as an offset to the calendar year 2023 VMP

1 activities,² in order to facilitate continued improvement in customer reliability and
2 to meet the 2023 VMP objectives. It is my understanding that the Company’s full
3 RRA adjustment for calendar year 2023 will be filed on or around May 1, 2024.
4 As of December 31, 2023, the Company completed the 2023 VMP workplan as
5 scheduled. As of March 1, 2024, the preliminary information available shows no
6 similar carryover adjustment is required in relation to 2023 VMP activities.

7 **IV. 2024 VEGETATION MANAGEMENT PROGRAM PLAN**

8 **Q. Mr. Allen and Mr. Farley, please describe the Company’s VMP plan for 2024.**

9 A. As reflected in Attachment RDA/IJF/EN/AVM-2, which was filed in Docket No.
10 DE 19-057 on November 15, 2023, the Company anticipates trimming 2,347 miles
11 of SMT/METT in 2024. The 2024 Distribution SMT Total estimated cost is
12 \$21,982,301, which was not adjusted for reimbursements expected to be received
13 from telephone company providers related to SMT activities. This plan reflects the
14 scheduled miles for the Company to maintain a five-year maintenance cycle, in line
15 with the “no more than 5-year cycle” tree-pruning requirements of the
16 Commission’s rules under Puc 307.10. The Company is still within the
17 Commission’s mandate of a five-year cycle schedule for SMT.

18 As discussed in Docket Nos. DE 21-029, DE 22-010, and DE 23-021, the last four-
19 year contract for SMT ended in December 2020. The new four-year contract has
20 resulted in a significant increase in the cost per mile for all awarded work. This

² See Order No. 26,863 (July 28, 2023).

1 increase has resulted in a larger budget needed to complete the anticipated tree work
2 than the one that was agreed to in the Settlement. The Company will invest in VM
3 at the necessary level to complete the programs that it believes are foundational to
4 a strong VMP. These programs include SMT, METT, Hazard Tree Removal, ETT,
5 and Full Width Clearing of ROWs. This investment will also consider the current
6 operating procedures with the various telephone companies, along with the 10
7 percent “overage” identified in Section 6.2 of the Settlement.

8 **V. 2023 RELIABILITY PERFORMANCE**

9 **Q. Ms. Ntakou and Mr. Mierzwa, please describe the Company’s reliability**
10 **performance in 2023.**

11 A. For many years as part of the Company’s REP filings, Eversource provided
12 information on numerous reliability statistics and performance metrics. Those
13 reports showed the impact of the REP and the generally improving trends in system-
14 average metrics of Eversource reliability performance that resulted from the REP,
15 as well as other Company initiatives aimed at improving the reliability and
16 resiliency of its distribution system.

17 Included as Attachment RDA/IJF/EN/AVM-3 is the 2023 Annual Reliability
18 Report, which provides information similar to, but more expansive than, what had
19 previously been included in the REP reports. This attachment is consistent with the
20 format used for this report in Docket Nos. DE 21-029, DE 22-010, and DE 23-021.

21 Section 1 of Attachment RDA/IJF/EN/AVM-3 contains various graphs and charts

1 agreed to by the parties to the Settlement to demonstrate the general trends and
2 outcomes regarding reliability over the past five years, using various reliability
3 metrics, such as SAIDI, SAIFI, CAIDI, and CIII, as specified in Appendix 4 of the
4 Settlement, and using IEEE reporting criteria. Metrics are broken down based on
5 the cause type as well as the type of day (i.e., whether or not the day is excludable).

6 Section 2 of Attachment RDA/IJF/EN/AVM-3 explains the various operations and
7 maintenance (“O&M”) activities conducted by the Company in 2023 that were
8 aimed at addressing reliability issues. Those activities included patrols of overhead
9 distribution lines, inspections of underground developments and pad-mounted
10 equipment, inspections of wood distribution poles for decay, and repairs of non-
11 capital items on distribution lines related to the National Electrical Safety Code.
12 Such activities are intended to identify potential problems or failures so that they
13 may be proactively addressed before they impact customers.

14 Section 3 of Attachment RDA/IJF/EN/AVM-3 contains the capital expenditures
15 made by the Company on various reliability-related activities. This report provides
16 information on “routine” capital projects targeting reliability, as well as specific
17 projects, with information on the replacement of wooden distribution poles found
18 to be defective through inspection, replacement of direct buried underground cable
19 with new cable in conduit, and other capital reliability projects with spending
20 greater than \$100,000 during the calendar year. This last category is further broken

1 down into new projects initiated in 2023, and projects with expenditures in 2023
2 over the threshold but which were established in prior years.

3 Lastly, Section 4 of Attachment RDA/IJF/EN/AVM-3 contains the Company's
4 "Worst Performing Circuits" list. This list is adjusted annually to track the 50
5 circuits with the highest contribution to the Company's SAIDI and SAIFI (in two
6 separate lists) during the previous year. This ranking helps to inform the Company's
7 priorities for future reliability work.

8 **VI. CONCLUSION**

9 **Q. Do you have any concluding remarks?**

10 A. The reports and related information included with this filing show that the
11 Company was successful in its vegetation management activities in 2023 and that
12 the Company has demonstrated continuing improvement in customer reliability
13 over time, all of which are beneficial to customers in New Hampshire.

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

15 A. Yes, it does.