

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

Docket No. DE 24-XXX

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty
Calendar Year 2023 Storm Fund Report

DIRECT TESTIMONY

OF

ANTHONY STRABONE

AND

ROBERT GARCIA

April 1, 2024



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1 **I. INTRODUCTION OF WITNESSES**

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

3 A. My name is Anthony Strabone, my business address is 15 Buttrick Road, Londonderry,
4 New Hampshire, and I am employed by Liberty Utilities Service Corp. (“LUSC”). I am
5 the Senior Director of Operations for LUSC, and I am responsible for the safe and
6 reliable operation, design, and maintenance of the electric system for Liberty Utilities
7 (Granite State Electric) Corp. (“Liberty” or “the Company”) in New Hampshire.

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

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

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

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

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

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

1 **Q. Mr. Garcia, please state your name, business address, company position, and**
2 **principal responsibilities in your current position.**

3 A. My name is Robert Garcia. My business address is 15 Buttrick Road, Londonderry, New
4 Hampshire. My title is Manager, Rates and Regulatory Affairs. As Manager of Rates and
5 Regulatory Affairs, I am primarily responsible for rate administration and regulatory
6 affairs for Liberty EnergyNorth and Liberty Utilities (Granite State Electric) Corp.

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

8 A. I have an Artium Baccalaureus (Bachelor of Arts) degree in Political Science and French
9 from Wabash College (Crawfordsville, Indiana) and a Master of Public Administration
10 degree from the School of Public and Environmental Affairs at Indiana University
11 (Bloomington, Indiana) with concentrations in Policy (Quantitative) Analysis and
12 International Affairs. I also obtained a Certificat De Langue Et Civilisation Française
13 from the Université de Paris – Sorbonne (Paris, France) and, as part of my graduate
14 studies, studied French and European government at the École Nationale
15 D'Administration (Paris, France).

16 I was employed by ComEd from April 2001 to March 2023. I began my employment
17 with ComEd in the Regulatory Department as a Regulatory Specialist and moved on to
18 the positions of Senior Regulatory Specialist in 2004, Manager of Regulatory Strategies
19 and Solutions in 2008, and Director of Regulatory Strategy and Services in 2013 before
20 assuming my last position as Director or Regulatory Innovation & Initiatives in 2021.

1 Prior to joining ComEd, I worked for nearly nine years at the Illinois Commerce
2 Commission, beginning in 1992 as an intern in what was then the Office of Policy and
3 Planning and ending in 2001 as the senior policy advisor to a Commissioner. I initially
4 joined the Commission Staff through the James H. Dunn Memorial Fellowship program,
5 a one-year program sponsored by the Office of the Governor. Through this Fellowship, I
6 also held short-term positions in the Bureau of the Budget and the Governor's Legislative
7 Office.

8 **Q. Have you previously testified before the New Hampshire Public Utilities**
9 **Commission?**

10 A. Yes, I have.

11 **II. PURPOSE OF TESTIMONY AND BACKGROUND**

12 **Q. What is the purpose of your testimony?**

13 A. This testimony supports Liberty's Calendar Year 2023 Storm Fund Report in compliance
14 with the Settlement Agreement approved by the Commission in Order 24,777 (July 12,
15 2007) in Docket No. DG 06-107 and the Settlement Agreement subsequently approved
16 by the Commission in Order No. 25,638 (March 17, 2014) in Docket No. DE 13-063.
17 Consistent with these Orders, this testimony (1) provides a description of two pre-staging
18 weather events and two qualifying storms experienced in 2023, and (2) details the
19 collections credited to, and balance of, the storm fund.

1 **Q. What is the history of the Storm Fund?**

2 A. Under the settlement agreement approved in Docket No. DG 06-107, a Storm
3 Contingency Fund (“Storm Fund”) was established for Granite State, with annual funding
4 of \$120,000, to cover the incremental costs associated with major weather events. The
5 Company is allowed to defer costs attributable to pre-staging and restoration efforts
6 originating from weather events that meet the criteria discussed below and to draw from
7 the Storm Fund for qualifying events. Under the Settlement Agreement approved in
8 Docket No. DE 13-063, Liberty was authorized to increase the annual funding level to
9 \$1.5 million.

10 **Q. What are the requirements for a weather event to qualify for recovery from the**
11 **Storm Fund?**

12 A. There are two ways that a weather event may qualify for recovery from the Storm Fund –
13 either as a pre-staging event or as a major storm. Specific eligibility criteria apply to each
14 category as described below.

15 Liberty receives a daily weather forecast of an Energy Event Index (“EEI”) for the next
16 ten days from DTN, a weather forecasting company. The EEI provides highly detailed
17 weather forecasts by region and zone for the four Liberty territories in New Hampshire.
18 The forecast from DTN includes all relevant weather metrics needed to determine the
19 severity and location of an imminent storm. The EEI ranks the impact of the storm on a
20 scale from 1 to 5, with 5 being the most severe. DTN uses a probabilistic model to
21 determine the forecasted impact of the storm.

1 Pursuant to the criteria established in the Settlement Agreement, pre-staging costs can be
2 recovered through the Storm Fund if the weather event had a “high” probability (*i.e.*,
3 greater than 60% based on the forecast) of reaching “Level 3” or stronger, according to
4 the EEI:

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

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

14 For those events that do not meet the criteria for pre-staging, they may still be considered
15 a Major Storm eligible for recovery through the Storm Fund, if certain other criteria are
16 met. A Major Storm is defined as an event that results in either (a) 15% or more of
17 Liberty’s retail customers being without power in conjunction with more than 30
18 concurrent troubles, or (b) more than 45 concurrent troubles during the event. *Id.*

19 **Q. What weather information does the Company use to make decisions on pre-staging?**

20 A. The Company receives weather information from local and national news outlets and
21 DTN, the paid weather forecasting service referenced above. DTN provides daily weather
22 forecasts at 7:00 a.m. and 1:00 p.m., and the Company utilizes artificial intelligence
23 machine learning applied to outage prediction, meteorologist-enhanced artificial
24 intelligence, and probabilistic outcomes and risk communication, which are upgrades the

1 Company adopted in 2021. Modeling hazards have provided greater detail and allowed us
2 to make better, potentially less expensive, decisions on how to respond to the storm
3 event.

4 **III. 2023 STORM FUND ACTIVITY**

5 **Q. What storm events are the subject of this filing.?**

6 A. In this section, the Company presents information supporting the costs for two pre-staged
7 storms and two qualifying storms in 2023, which the Company is requesting to include in
8 its storm deferral account:

- 9 1. Winter Storm Olive – February 2023- (Pre-Staged)
- 10 2. Winter Storm Quest – March 2023- (Pre-Staged)
- 11 3. Winter Storm Sage – March 2023- (Qualifying Storm)
- 12 4. Wind Event – December 2023- (Qualifying Storm)

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

14 Yes. Attachment 2 provides the financial data associated with each storm described in
15 this section.

16 The total pre-staging and qualifying costs for 2022 and 2023 events are \$2,442,251.45.

17 Please see the table below for a summary of costs.

1 *Table 1. Summary of 2023 Costs¹*

Line No.	Description	Total Costs
1	Payroll charges including payroll overheads for GSE Employees	\$777,665.02
2	<u>Non-Labor Costs</u>	<u>\$1,664,586.43</u>
3	Total	\$2,442,251.45

2

3 **Q. Why has the Company included financial information for 2022 in this filing?**

4 A. Per the agreement reached on Audit Issue #1 of the Final Audit Report (August 17, 2023)
5 in Docket No. DE 23-035, the Company carried forward the costs of \$18,870 for Winter
6 Storm Diaz (Job # 2209) and \$23,110 for Winter Storm Elliot (Job # 2210) into the
7 instant proceeding in order to avoid confusion in that previous storm docket. However, it
8 subsequently was discovered that a June 2023 charge of \$711 that was assigned to Winter
9 Storm Elliot in the Final Audit Report was coded in error. Therefore, that amount has
10 been removed and is not included in this filing. Thus, the total amount of costs to be
11 recovered from 2022 storms are \$41,980 compared to the \$42,691 in the Final Audit
12 Report. Attachment 7 includes the Final Audit Report for reference.

13 **Q. What is the Company’s primary tool for accounting for storm restoration costs?**

14 A. During the pre-storm planning process for a pending Emergency Response Plan (“ERP”)
15 event, Liberty creates two storm work orders within its financial system to capture costs:
16 (1) a work order to capture costs related to vegetation management, and (2) a work order

¹ Includes the 2022 costs deferred into 2023 per the 2022 Annual Storm Fund Report Final Audit Report referenced above.

1 to capture restoration effort costs. For example, as employees work on restoration efforts,
2 all appropriate work hours are charged to the storm-specific work order, which allows for
3 the tracking of storm costs. To capture costs incurred by employees in fulfilling their
4 storm duties, the Company utilizes procurement cards. The purpose of these purchases is
5 to obtain non-capital items that are not typically maintained in inventory, meals, and
6 lodging where the Company does not have an established purchase order. Receipts for all
7 purchases are required for submission into the Company system. Expenses are charged
8 against the storm-specific work order to allow costs to be tracked for the specific event.

9 **Q. Are capitalized storm costs excluded from this request for recovery?**

10 A. Yes. During a major storm event, capital costs are incurred in relation to the restoration
11 and/or replacement of equipment damaged by the storm, such as poles and transformers.
12 Capital work occurs in two stages of the storm: (1) within the first stage of the storm, in
13 the days immediately following when the Company and its contractors are working to
14 restore power to customers efficiently and safely; and (2) during the non-emergency,
15 post-storm restoration stage, which can last well after the event has passed, as permanent
16 repairs are made to replace temporary repairs made to restore power immediately after
17 the storm. The work is considered capital under utility general accounting rules where a
18 unit of property is either replaced or newly installed. Initially, all materials and labor are
19 charged to the expense work order to track costs for the event. After the event, all
20 material charges are reviewed and any units of property are moved to a capital work
21 order, along with the associated labor costs. As a result, the costs submitted in this filing
22 for recovery through rates are exclusive of any capitalized costs incurred. All capital

1 costs are reflected within utility plant subject to the ordinary distribution ratemaking
2 process.

3 **Q. Please provide an overview of the costs that are included for review in this filing, by**
4 **cost category.**

5 A. The Company has organized the costs relating to each storm event into the following
6 categories: (1) payroll charges, including payroll overhead for employees, and (2) non-
7 labor charges, including charges from outside companies such as line contractors,
8 material and supply costs, procurement card charges and charges for employee expenses,
9 and accruals for outside companies.

10 **Q. What types of costs are incurred for the first category of payroll charges including**
11 **payroll overheads for employees?**

12 A. This category includes the costs of overhead line crews working on the overhead system
13 to restore power to customers, and the internal employees needed to assist Operations
14 during the event.

15 **Q. What charges from outside companies would be charged to these events?**

16 A. Professional line contractors, vegetation management and service crews are included in
17 this category and are procured to work on the Liberty system during these events. They
18 may include electrical contractors and/or mutual aid from other utilities.

19 **Q. What types of materials and supplies are charged to the storm?**

20 A. As stated previously, any equipment that is installed or replaced due to storm damage is
21 included in this category.

1 **Q. What items are included in procurement card charges and employee expenses?**

2 A. Most of the charges on the procurement cards are for meals as not all restaurants have
3 purchase orders with Liberty. Employee expenses include mileage for employees that do
4 not report to the work center as part of their daily employment.

5 **A. February 22, 2023, Winter Storm Olive – Pre-staged Event**

6 **Q. What was the storm forecast for this first event in 2023?**

7 A. On Monday, February 20, 2023, DTN and other weather services began forecasting the
8 potential for a significant Winter Storm around February 22, 2023, in the Company's
9 territory. The Company received an EEI level 3 with high confidence on the afternoon of
10 February 22, as shown in Attachment 3. The storm event was expected to impact the
11 region from 9:00 p.m. Wednesday through 12:00 a.m. on Friday, February 24, 2023, with
12 the highest snowfall expected in the Lebanon area. The forecast also predicted wind gusts
13 up to 30 mph. In light of the forecast, the Company prepared for the possibility of
14 outages.

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

17 A. The Company implemented its Incident Command Structure and mobilized its internal
18 and contractor line crews, along with contractor tree crews. Customer Service staffed its
19 contact center with customer service representatives in staggered shifts into the evening
20 until the end of the event. Damage assessors and wires down guards were contacted for

1 availability and the Company remotely opened the municipal room to aid towns inquiring
2 about preparations.

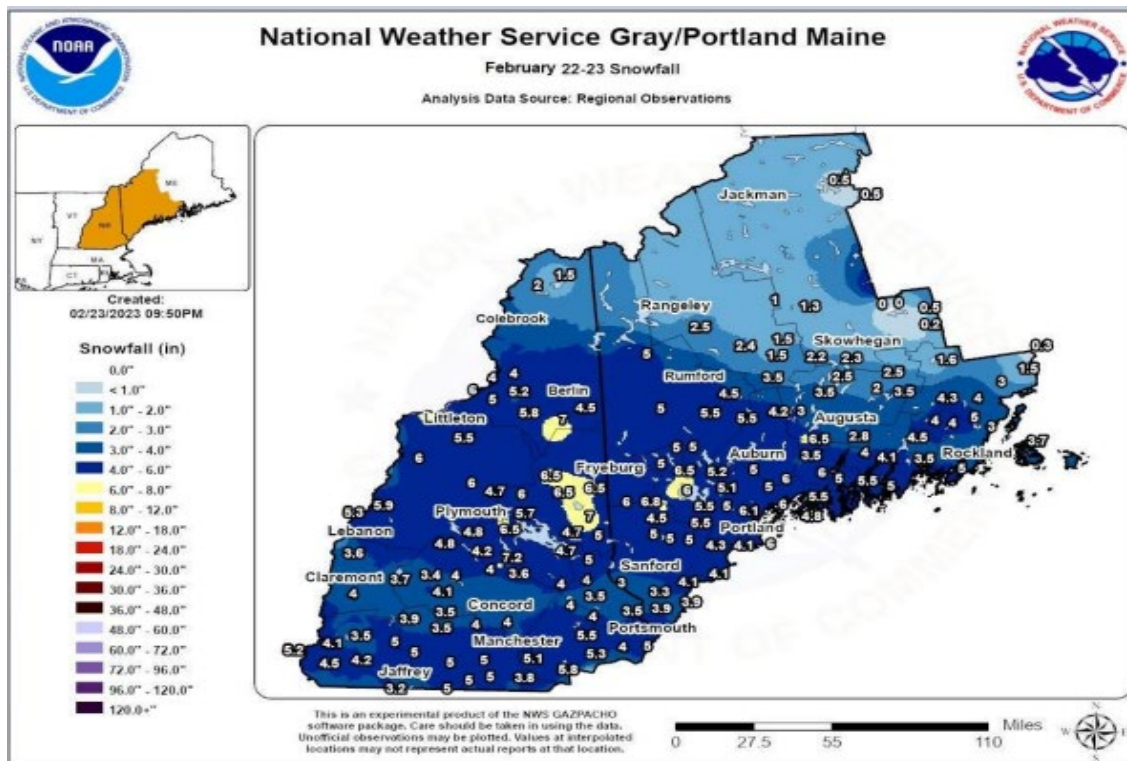
3 **Q. Did the Company experience outages during this event?**

4 A. No. While the snowfall consistency was mostly wet to normal with sustained winds
5 throughout the storm, the system did not experience any outages.

6 **Q. What were the final snowfall totals?**

7 A. The image below from the National Weather Service provides a snapshot of snow totals.

8 **Figure 1.** Winter Storm Olive - Total Snowfall (inches)



9
10 **Q. Does this storm qualify for recovery for pre-staging costs?**

11 A. Yes. The predicted storm was classified as an EEI level 3 with high confidence.

1 **Q. What pre-staged costs are included in this request for recovery?**

2 A. Please see Attachment 2, page 3 for the breakdown of costs. A summary of costs is
3 provided in the table below.

4 ***Table 2. Winter Storm Olive - Summary of Costs***

Line No.	Description	Total Costs
1	Payroll charges including payroll overheads for GSE Employees	\$68,173.21
2	<u>Non-Labor Costs</u>	<u>\$94,537.46</u>
3	Total	\$162,710.67

6 **B. March 4, 2023, Winter Storm Quest – Pre-staged Event**

7 **Q. What was the storm forecast for this second event?**

8 A. On Monday, February 27, 2023, DTN and other weather services began forecasting the
9 potential for a significant winter storm around March 4, 2023, in the Company’s territory.
10 The Company received an EEI level 3 with high confidence on the afternoon of March 3,
11 2023, as shown in Attachment 4. The storm event was expected to impact the region from
12 11:00 p.m. Friday through 6:00 p.m. on Saturday, March 4, 2023. The forecast predicted
13 that the snowfall would have wet characteristics. Therefore, the Company prepared for
14 the possibility of outages.

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

17 A. The Company implemented its Incident Command Structure and mobilized its internal
18 and contractor line crews, along with contractor tree crews. Customer Service staffed its

1 contact center with customer service representatives in staggered shifts into the evening
2 until the end of the event. Damage assessors and wires down guards were contacted for
3 availability, and the Company remotely opened the municipal room to aid towns
4 inquiring about preparations.

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

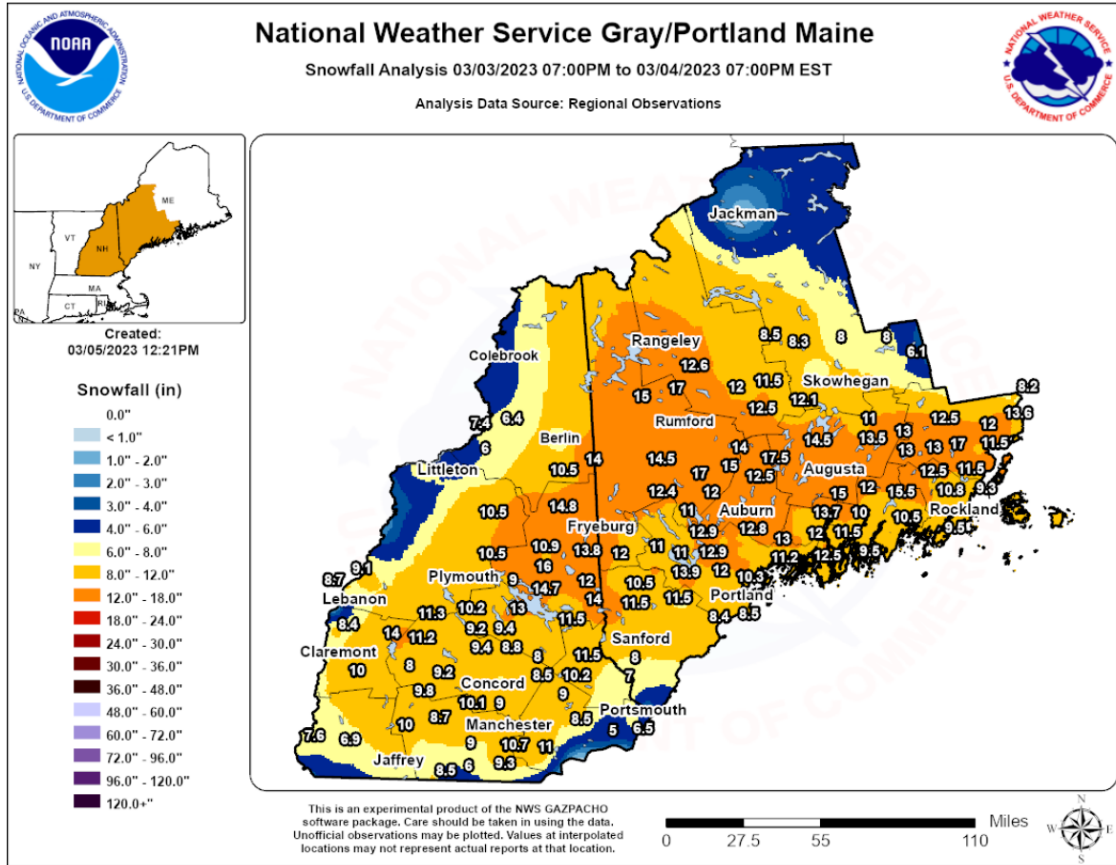
6 A. No. While the snowfall was considerable, the consistency was mostly normal to dry, and
7 the system did not experience any outages.

8 **Q. What were the final snowfall totals?**

9 A. The image below from the National Weather Service provides a snapshot of snow totals.

1

Figure 2. Winter Storm Quest - Total Snowfall (inches)



2

3 **Q. Does this storm qualify for recovery for pre-staging costs?**

4 A. Yes. The predicted storm was classified as an EEI level 3 with high confidence.

5 **Q. What pre-staging costs are included in this request for recovery?**

6 A. Please see Attachment 2, page 4 for the breakdown of costs. A summary of costs is
7 provided in the table below.

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Table 3. Winter Storm Quest – Summary of Costs

Line No.	Description	Total Costs
1	Payroll charges including payroll overheads for GSE Employees	\$109,795.27
2	<u>Non-Labor Costs</u>	<u>\$169,359.04</u>
3	Total	\$279,154.31

C. March 14, 2023, Winter Storm Sage – Qualifying Event

Q. What was the storm forecast for this third event?

A. On Friday March 10, 2023, DTN and other weather services began forecasting the potential for a significant snowstorm around March 13, 2023, in the Company’s territory. The Company received an EEI level 3 with high confidence on the morning of March 14, 2023, as shown in Attachment 5. The storm event was expected to impact the region from 2:00 a.m. Tuesday through 3:00 p.m. on Wednesday, March 15, 2023, with the highest snowfall expected in the Charlestown/ Lebanon area. The forecast predicted that the snowfall would have wet characteristics. Therefore, the Company prepared for the possibility of outages.

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

A. The Company implemented its Incident Command Structure and mobilized its internal and contractor line crews, along with contractor tree crews. Customer Service staffed its contact center with customer service representatives in staggered shifts into the evening until the end of the event. Damage assessors and wires down guards were contacted for

1 availability, and the Company remotely opened the municipal room to aid towns
2 inquiring about preparations.

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

4 A. Yes. The table below provides the summary of reliability indices for this event and
5 Attachment 5 provides further details of the outage impacts.

6 **Table 4. Winter Storm Sage – Summary of Outage Statistics**

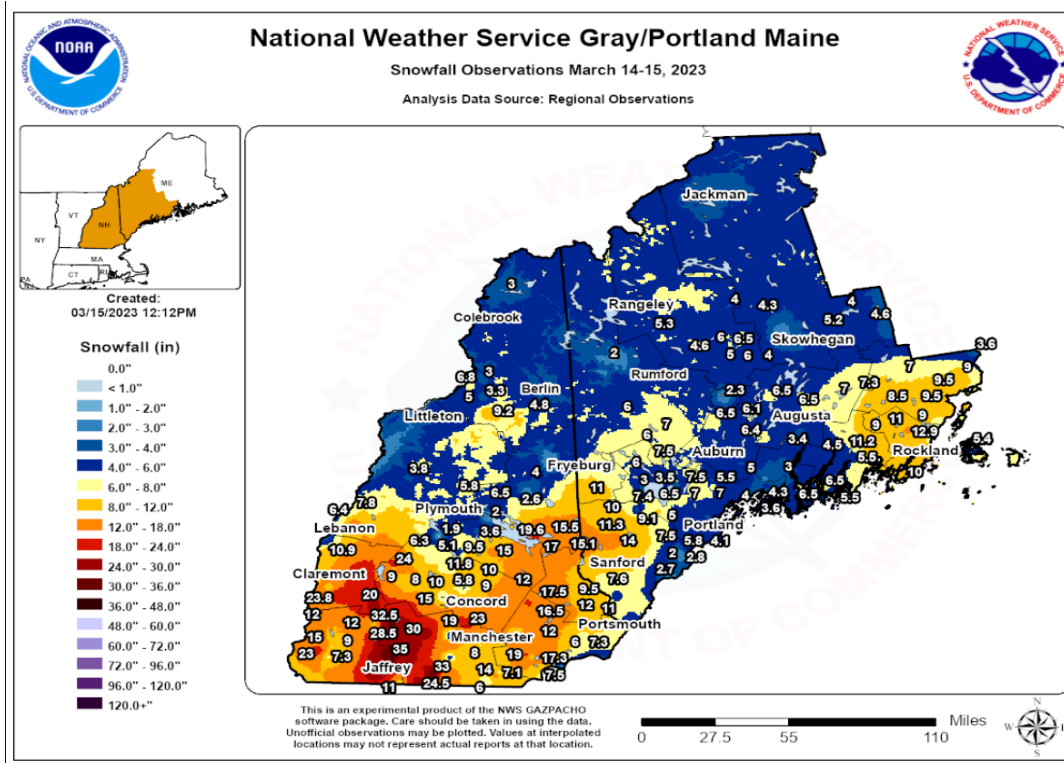
TROUBLES	CUSTOMERS INTERRUPTED	CUST. MINUTES INTERRUPTED	CUSTOMERS SERVED	SAIDI	SAIFI	CAIDI
68	13,367	3,858,066	45,483	84.82	0.294	288.6

7

8 **Q. What were the final snowfall totals?**

9 A. The image below from the National Weather Service provides a snapshot of snow totals.

1 **Figure 3. Winter Storm Sage - Total Snowfall (inches)**



2

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

4 **A.** Yes. The predicted storm was classified as an EEI level 3 with high confidence and the
 5 system encountered 68 troubles during the storm period, exceeding the 45 concurrent
 6 troubles criterion to qualify as a major storm event. The Settlement Agreement in Docket
 7 No. DG 06-107 provides:

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

1 Docket No. DG 06-107, Hearing Exhibit 3, at 67.

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

3 A. Please see Attachment 2, page 5 for the breakdown of costs. A summary of costs is
4 provided in the table below.

5 ***Table 5. Winter Storm Sage – Summary of Costs***

Line No.	Description	Total Costs
1	Payroll charges including payroll overheads for GSE Employees	\$417,944.07
2	<u>Non-Labor Costs</u>	<u>\$1,157,913.55</u>
3	Total	\$1,575,857.62

6

7 **D. December 18-23, 2023, Wind Event – Qualifying Event**

8 **Q. What was the storm forecast for this fourth event?**

9 A. On December 15, 2023, DTN and other weather services began forecasting the potential
10 for a Wind Event on December 18, 2023. The forecast called for strong wind gusts up to
11 50 MPH for the Company’s Lebanon and Charlestown service areas.

12 DTN forecasted an EEI of 3 with medium confidence for the Salem area on December
13 18, 2023, with potential wind gusts of up to 60 mph until the evening of December 18,
14 2023.

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 and contractor line crews, along with contractor tree crews. Customer Service staffed its
5 contact center with customer service representatives in staggered shifts into the evening
6 until the end of the event. Damage assessors and wires down guards were contacted for
7 availability, and the Company remotely opened the municipal room to aid towns
8 inquiring about preparations.

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

10 A. Yes. The table below provides the summary of reliability indices for this event and
11 Attachment 6 provides further details of the outage impacts.

Table 4. Wind Event Summary of Outage Statistics

TROUBLES	CUSTOMERS INTERRUPTED	CUST. MINUTES INTERRUPTED	CUSTOMERS SERVED	SAIDI	SAIFI	CAIDI
70	5,564	1,186,084	45,718	25.94	0.122	213.17

13
14 **Q. Does this storm qualify for recovery for qualifying storm costs?**

15 A. Yes. The system encountered 70 troubles during the storm period, exceeding the 45
16 concurrent troubles criterion to qualify as a major storm event. Again, the Settlement
17 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

1 State this is defined as a severe weather event or events causing 30
2 concurrent troubles and 15% of customers interrupted, or 45 concurrent
3 troubles. Troubles are defined as interruption events occurring on either
4 primary or secondary lines.

5 Docket No. DG 06-107, Hearing Exhibit 3, at 67. Attachment 6 provides the breakdown
6 of troubles.

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

8 A. Please see Attachment 2, page 6 for the breakdown of costs. A summary of costs is
9 provided in the table below.

10 ***Table 7. Wind Event – Summary of Costs***

Line No.	Description	Total Costs
1	Payroll charges including payroll overheads for GSE Employees	\$181,045.59
2	<u>Non-Labor Costs</u>	<u>\$201,503.04</u>
3	Total	\$382,548.63

11

12 **IV. STORM FUND COLLECTIONS**

13 **Q. Did the Company refund a portion of the Storm Fund balance to customers**
14 **pursuant to the Commission’s Order No. 26,777 (Feb. 23, 2023) in Docket No. DE**
15 **23-006?**

16 A. Yes. The Company refunded \$1,861,473 to its retail delivery service customers through
17 the Storm Recovery Adjustment Factor (“SRAF”) over a twelve-month period beginning
18 on March 1, 2023, and ending on February 29, 2024. at a rate of (\$0.00202). The rate was

1 derived by dividing the refund balance of \$1,861,473 by Liberty's then forecasted kWh
2 sales of 922,721,904 kWh for the period.

3 **Q. What is the status of the Storm Fund?**

4 A. As of December 31, 2023, the adjusted ending balance in the Annual Storm Fund is
5 estimated to be (\$ 294,985). Including expenses associated with the 2023 events incurred
6 in 2024 draws the balance down further to (\$394,375.12). This information is presented
7 in Attachment 1. In summary, while the Company started 2023 with a roughly \$ 1.9
8 million Storm Fund balance and continued to collect \$1.5 million to replenish the Fund,
9 the SRAF refund of \$1.4 in 2023 essentially wiped out the base distribution rate
10 recoveries for the year, and 2023 storm expenditures exceeded what was left in the Fund.
11 In 2024, the Fund was further depleted in January and February by the continued SRAF
12 refunds.

13 **Q. Does the Company intend to file an SRAF to replenish the Storm Fund?**

14 A. Yes. Depending on the timing of the audit of 2023 expenditures, the Company expects to
15 file an SRAF for approval sometime this summer. As part of such filing the Company
16 anticipates revisiting 2022 discussions of the optimal balance to maintain in the Fund in
17 order to achieve the inherent objective of the mechanism to mitigate the rate impacts of
18 these expenditures.

19 **V. CONCLUSION**

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

21 A. Yes.

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