Unitil Restoration Prioritization

The NEI Assessment Report incorrectly concludes that Unitil's restoration strategy during the ice storm was inappropriate.

The assessment report incorrectly states that the restoration strategy at Unitil during the December 2008 ice storm "*was to attempt to get all customers restored at the same time.*" This is then contrasted with the other utilities where the strategy is to "*try to restore customers as rapidly as possible which means that some customers who are more isolated or on systems with more damage, may wait longer for power to return.*" The report then concluded that this strategy at Unitil may impede the rate at which customers are restored. *Reference* Page II-48.

In support of this conclusion, the Assessment Report references a response to a data request, Staff 1-47. This data request and response does not relate to the issue of restoration priority, and instead asks about resource allocations between affiliates in neighboring states. *Reference* Staff 1-47.

Unitil's restoration priority is, in fact, identical to the other companies. Priority is given to public safety (wires down), critical facilities, and critical needs customers to the extent feasible. Beyond that, customers are restored "as rapidly as possible," meaning that outages are prioritized in order of greatest number of customers impacted and rapidity of repair time. The Company's restoration prioritization is evidenced by the complaints received from small pockets of customers who were prioritized later in the restoration effort as resources were instead focused on restoring larger numbers of customers first, to achieve the goal of restoring as many customers as possible, as rapidly as possible. It is unclear what it even means to restore all customers "at the same time." Given that it is impossible to restore all customers simultaneously, and given that restoration proceeded piecemeal over the course of many days, there obviously must be a prioritization strategy to determine which customer outages are the next to be restored.

On Page II-49 of the report, there is reference to the slope of a graph displaying the rate of restoration to customers and comparing this graph to those of other companies. It is suggested that the rate of restoration is somehow slower at Unitil than the other companies. However, upon simple inspection of the referenced graphs, it appears they are all virtually identical. There is no substantial difference between any of them, other than some companies start with more customers interrupted than others, and the Y-axis is therefore different on each graph. They all show identical patterns of rapid restoration on the first day of the storm followed by a gradual flattening of the curve as the days wear on. Various explanations are offered based on the shape of the curve, all based on the notion that the slope is somehow different, none of which are based in fact or reality.

In the second paragraph of Page II-49, the report concludes that "*the fact that all of the customer graphs including Unitil's show a relatively steep exponential shape indicates that the philosophy of Unitil is impractical to achieve and probably an inappropriate*

goal." This statement seems to contradict the very conclusion reached in the previous paragraph: that Unitil was somehow different versus the other companies. We agree that restoring all customers at the same time is an inappropriate goal. More to the point, it is an impossible goal. However, the discussion in this section reflects a misunderstanding of restoration priorities at Unitil. As already stated, Unitil's restoration priority is identical to the other companies. This is reflected in Figure II-11, and in the identical shape of all the restoration graphs. The initial rate of restoration was primarily dictated by the fact that most of the sub-transmission system was out and needed to be restored first, and was impacted by constraints such as impassible roads, impassible Rights-of-Way, and conditions in the field.

All the other discussion in this section is without basis or merit, including the speculation that "this goal of trying to restore all customers at the same time may represent a means of being fair to all customers (i.e., everyone gets served at the same time)." As already stated, restoring power to all customers simultaneously isn't simply impractical, it's impossible. It isn't a consideration in the prioritization of repairs.

The final paragraph on Page II-49 suggests that Unitil's Massachusetts territory received what appears to be an inordinate number of crews relative to the number of customers without power. However, "numbers of customers without power" is only one factor to consider when developing a restoration strategy and the allocation of resources. A large number of customers may be without power due to a single simple problem that can be repaired in a matter of hours (e.g., a transmission outage). Or the same number of customers may be without power due to numerous outages and extensive damage, all of which could take days to repair. Crew allocations are based on "damage" and estimated restoration times ("ETR's") derived from damage assessment and repair times. This is no different than the other companies' procedures.

The report then wrongly concludes that Unitil's strategy in this regard is different than the other companies, and is inappropriate.

Recommendation No. 1: Unitil should adopt a storm restoration strategy that is based on achieving restoration for the largest number of customers in the least amount of time.

This is Unitil's storm restoration strategy. Therefore, the conclusion, the recommendation, and all the supporting discussion are invalid, and factually incorrect.