

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3501-PET

Petition of Green Mountain Power for approval)
of its Zero Outages Initiative as a strategic)
opportunity pursuant to 30 V.S.A. § 218d and)
GMP’s multi-year regulation plan)

**JOINT PREFILED REBUTTAL TESTIMONY OF
DONALD MILLS AND KYLE BUXTON
ON BEHALF OF GREEN MOUNTAIN POWER**

April 15, 2024

Summary of Testimony

Messrs. Mills & Buxton address comments provided by the Department of Public Service (“DPS” or the “Department”), explain the need for ZOI now, how projects in their hard-hit southern and central Vermont districts are already benefiting customers, and how accelerating these proven solutions is critical in the face of ever-increasing severe weather. They explain how field teams and line crews see the importance of this work from their direct experience, and their interactions with the communities they serve leading up to and after the ZOI filing.

Exhibit List

Exhibit GMP-DM-KB-1	April Storm Photos
Exhibit GMP-DM-KB-2	Goshen April Storm Video

**JOINT PREFILED REBUTTAL TESTIMONY OF
DONALD MILLS AND KYLE BUXTON
ON BEHALF OF GREEN MOUNTAIN POWER**

1 **Q1. Please state your names, addresses and occupations.**

2 A1. Mr. Mills: My name is Donald Mills. I am a GMP T&D Operations Supervisor for the
3 Brattleboro district. My business address is 455 West River Road Brattleboro, VT 05301.

4 Mr. Buxton: My name is Kyle Buxton. I am a GMP T&D Operations Supervisor
5 for the Middlebury district and Vergennes district. My business addresses are 121 Cady
6 Road Middlebury, VT 05753 and 2 Mechanic Street, Vergennes 05491.

7 **Q2. Have you previously submitted testimony in this proceeding?**

8 A2. No, we have not previously submitted testimony in this proceeding, or any proceeding.

9 **Q3. What is the purpose of your testimony today?**

10 A3. We respond to the Department of Public Service’s (“DPS” or the “Department”) direct
11 testimony with respect to the need for ZOI work now, how projects in our districts are
12 already benefiting customers, and how important it is to accelerate these solutions we
13 know work. We lead two of the hardest hit districts, representing central and southern
14 Vermont, and share the experience of workers in the field, what they are seeing, and how
15 necessary this work is in the face of severe weather and storm restoration for both
16 customer and crew safety. We are closely connected to the towns and people we serve,
17 and finish by discussing our ongoing community engagement both before and after the
18 ZOI filing.

1 **Q4. Can you please describe your background and your current roles at GMP?**

2 A4. Mr. Mills: I have worked at GMP for 19 years. I started as a lineworker in the
3 Wilmington District for 16 years, and then moved into a leadership role three years ago. I
4 lead the lineworkers and field operations in the Brattleboro district which covers these
5 towns: Brattleboro, Brookline, Dover, Dummerston, Guilford, Jamaica, Marlboro,
6 Newfane, Stratton, Townshend, Vernon, and Wardsboro. Before GMP, I worked at the
7 Philadelphia Electric Company for 15 years, 11 years as a lineworker, and before that as
8 a mechanic for 4 years.

9 Mr. Buxton: I have worked at GMP for 20 years. I started as a meter reader for one year,
10 and then became a lineworker. I served as a lineworker for 17 years, and then moved into
11 a leadership role two years ago. I lead the lineworkers and field operations in the
12 Middlebury and Vergennes districts which covers these towns: Addison, Benson,
13 Brandon, Bridport, Bristol, Buels Gore, Charlotte, Cornwall, Ferrisburgh, Goshen,
14 Hancock, Hubbardton, Huntington, Leicester, Lincoln, Middlebury, Monkton, New
15 Haven, Orwell, Panton, Pittsford, Ripton, Salisbury, Shoreham, Starksboro, Sudbury,
16 Vergennes, Waltham, Weybridge, Whiting. Before that I worked full-time at Buxton's
17 Store in Orwell, VT and worked part-time driving a school bus for the Orwell School
18 District.

19 **Q5. Can you describe generally what you and your district do during storm events to**
20 **protect customers?**

21 A5. Mr. Mills: The GMP team tracks multiple forecasts days in advance of any storm to
22 prepare. During a storm, local districts like the ones we run, Brattleboro, Middlebury and

1 Vergennes, coordinate crews to respond to outages and damage. Local dispatching is key,
2 as it leads to efficient and effective storm management for customers, with experts in
3 local districts making decisions. Although the GMP team is good at preparing and
4 responding, storms are increasing and getting worse. The recent April storm is yet
5 another example of the conditions our field crews face from the severe weather that
6 continues to increase. During the high wind and heavy wet snow, conditions in the field
7 were dangerous, with trees crashing down and many roads closed. This picture was taken
8 at Townshend Dam and shows the severe conditions being faced by customers and crews.



9
10 Mr. Buxton: I agree with Mr. Mills when he mentions storms are getting worse. Crews

1 have always worked with safety as the focus, and with the intense weather in recent
2 years, we often have had to pause work before being able to make repairs. As an
3 example, when wind gusts are blowing at hurricane force, trees are often crashing down
4 around us, and crews have to stop. This continual loop of severe weather, and repairs,
5 does not make sense, as we have solutions that are working now and can help customers
6 while we are unable to make repairs. The projects we know need to be done and will be
7 done as part of this initiative, will deliver more quickly lasting solutions that work for our
8 communities. We feel strongly that undergrounding with cable in conduit, reconductoring
9 with spacer cable, and battery storage is what is needed to keep both customers and crews
10 safe. These solutions work, we just need the approval to do more now.

11 **Q6. Can you describe the damage crews experienced during the April storm?**

12 A6. Mr. Mills: As shown in the photo above, our teams are seeing more and more trees from
13 outside the right of way causing extensive damage. In **Exhibit GMP-DM-KB-1** we
14 provide more pictures from the field during that storm, including many from towns in our
15 districts. What is tough to think about is that all these images of damage are from just one
16 storm, and it really represents the damage these stronger storms are causing over and over
17 again. Crews are facing large, healthy trees falling, being ripped out of the ground by
18 often near hurricane force gusts. While trimming helps day-to-day blue-sky reliability
19 stay strong, no amount of trimming is going to stop the damage our teams are up against
20 during storms.

1 **Q7. How were you part of outreach to the communities you serve, following the historic**
2 **storm season of 2023, that has continued into 2024?**

3 A7. Mr. Mills: As a lineworker for 16 years, and a T&D Operations Supervisor for 3 years, I
4 can tell you that GMP lineworkers are an incredible team, dedicated to their job and to
5 safety, and they work in all kinds of conditions and hours. Across GMP we have 11
6 Operations Supervisors covering our 15 districts. We each live in the communities we
7 serve. We are all so close. As the leader of the Brattleboro team, it is a responsibility I
8 take very seriously. After 2023 when there were a historic number of storms (both major
9 and minor), it was enough for our customers and enough for our teams. Central and
10 southern Vermont are the hardest-hit areas, and the Brattleboro District I lead has
11 consistently seen some of the worst damage and are the communities that would benefit
12 immediately from Phase 1 of the ZOI work.

13 I was part of an accelerated process of planning and doing projects in my area to
14 help improve customer experience during devastating storms. This included attending
15 meetings in the communities I serve, along with Ms. Smith and Mr. Burke. I attended all
16 the meetings that were held in my district including Wardsboro, Jamaica, Townshend,
17 Newfane, Brattleboro, and Guilford. In addition, I met on my own with the Wardsboro
18 Selectboard, Marlboro Selectboard, and the Dover Selectboard. I showed each town the
19 machine we are using for cable-in-conduit to underground and improve reliability for
20 their community. The feedback from communities was overwhelming, asking when work
21 can start, and these improvements be made. Ms. Smith details these meetings more in her
22 rebuttal testimony, but it was clear what was needed and what customers wanted. Even

1 beyond these meetings, on a day-to-day basis, I talk to customers regularly, from business
2 customers to residential customers, to anyone we serve in the Brattleboro district. These
3 conversations can be on many various topics, and one consistent thing I always hear from
4 customers is that they want reliable service. Customers cannot wait 24 hours for repairs.
5 They expect and need quick restoration no matter the conditions.

6 Mr. Buxton: I echo what Mr. Mills says. As a lineworker for 17 years, and a T&D
7 Operations Supervisor for two years, I love my job and working with the teams out of the
8 Middlebury and Vergennes districts. Like Mr. Mills, I think about their safety all the
9 time, and the safety of our customers in these weather events. I participated with Mr.
10 Burke and Ms. Smith in the Addison County Regional Planning Commission meeting to
11 talk about storms, resiliency work, and planning, as further detailed by Ms. Smith. Like
12 Mr. Mills, I also talk to many customers each day, and even more during outage events.
13 People in our community know us and the team. It is tough and surprising to hear the
14 DPS wants more outreach and more process to sort out what customers want and to
15 review these techniques we are already using and see working when they are in place. We
16 know what customers want. Customers want safety and reliability no matter where they
17 live. Working in central Vermont that has seen so much storm damage, we know there is
18 a better and more cost-effective way to help everyone, that ends this cycle and keeps
19 everyone safer. If we stay on this same path without accelerated ZOI work, I worry about
20 customers, crews, and costs. I just don't see it as sustainable with the number of these
21 events. That is why I felt the need, along with Mr. Mills, to share with regulators our

1 experience and that of our front-line teams and customers who are our neighbors, friends,
2 and family.

3 **Q8. What are you doing about these issues to improve reliability and resiliency for**
4 **customers?**

5 A8. Mr. Mills: In the Brattleboro district we have prioritized several projects to help
6 customers since the initial filing last year. This includes:

- 7 • The Townshend segment of the VH4A that Mr. Burke discussed in his direct
8 testimony which involves undergrounding a three-phase Zone 2 feeder with cable-
9 in-conduit and spacer cable construction. This portion of the project was
10 completed in January 2024. This work has helped customers, and now outages on
11 the VH4A are contained mainly to sections we have not been able to do yet but
12 would through ZOI.
- 13 • Zone 1 mainline three-phase projects along Route 30 from Townshend to
14 Newfane using Hendrix spacer cable, some already completed and others in
15 progress.
- 16 • We have also begun construction for two more segments of the VH4A in
17 Wardsboro and Dover, both also cable-in-conduit underground construction with
18 both three- and single-phase sections.
- 19 • Work also continues along Route 100 corridors toward Wardsboro with two
20 groupings of mainline projects in progress, around 120 poles per segment, all
21 three-phase lines with storm hardened overhead construction. If we had ZOI
22 approval for Phase 1, we could finish this work. Our goal is to connect the whole

1 Route 30 corridor which will keep customers with power due to the lines being
2 much more resistant to storm damage and also it will create strong feeder back up
3 capability.

4 Most of these projects are on the EJ-G7 circuit in the Jamaica, Townshend, and
5 Wardsboro area; this circuit is at the top of the list of the 20 least reliable circuits. We
6 have many more projects in mind that have not yet been fully designed and would
7 quickly be done if Phase 1 of ZOI is approved.

8 All these projects help customers. I have also witnessed the work of the automatic
9 rock saw trenching machine shown in **Exhibit GMP-MB-16**. It is a game-changer and
10 has already done over three miles of underground in my district far faster than traditional
11 methods. We are using all the latest innovations to make sure customers have a better
12 experience, and it's great to see it in use today.

13 Mr. Buxton: I have a very recent example of what a difference cable in conduit
14 undergrounding versus overhead can make. During the recent April wind and wet heavy
15 snowstorm, my district saw near if not hurricane force winds on the western slopes of the
16 Green Mountain ridge in Goshen, Ripton, Starksboro, and Lincoln. Please watch the
17 video I took and provided as **Exhibit GMP-DM-KB-2**. This shows the destruction along
18 Goshen Ripton Road with dozens and dozens of trees down. This area has about 1.25
19 miles of cable in conduit, these lines were not impacted by this damage. Also, in Ripton
20 there is a Zone 2, three-phase cross-country feed where we plan to put in 2.5 miles of
21 cable-in-conduit. Currently this line is almost inaccessible in the winter and is where we
22 often have trouble. This work would eliminate outages and costs in this section and keep

1 customers on. This is just one example of many where these projects make sense. I talk
2 regularly with customers on these lines, and they urgently want us to do this work.

3 **Q9. What improvements have you seen in areas with projects that use these techniques**
4 **and are in service?**

5 A9. Mr. Mills: The improvement we both see is that customers don't lose power. Beyond the
6 examples already, another one is that there was spacer cable just north of Townshend
7 with a tree lying on it, and the line was working just fine – customers had power on.
8 Crews were able to simply remove the tree, and customers never knew there was any
9 issue. We see it all the time with spacer cable. A pole can even get hit by a car and break
10 and be leaning out in the road, and customers stay on. In that situation we send out a
11 digger truck and keep the line “hot” and make repairs. A simple change like adding more
12 spacer cable as we are proposing in ZOI Phase 1, makes a big difference for customers so
13 they don't experience an outage. We both strongly feel these techniques are proven and
14 not risky, as we have been deploying many of them for years. This is what our crews are
15 doing and installing every day.

16 Mr. Buxton: Spacer cable is very reliable. In my districts, we have seen this in
17 action where we put in spacer cable in along the town of Brandon, and it has performed
18 very well. We are looking forward to doing more of this work to make sure customers do
19 not lose power. We also have installed spacer cable in Bristol, from our substation on
20 Hewitt Road all the way through the village toward Lincoln and Starksboro. This section
21 of line has withstood all the storms, except one time when it went out in hurricane force
22 gusts, since it was installed around 2009.

1 **Q10. Can you talk more about your interactions with customers and what benefits you**
2 **expect for customers after this ZOI Phase 1 work is completed?**

3 A10. Mr. Mills: I am in touch with customers all the time and many have my cell number,
4 especially customers who have faced multiple outages. This includes a customer in
5 Halifax where we have a design to improve their resiliency that would fall under our ZOI
6 proposal. It is tough to have solutions for customers we know will help them and not be
7 able to deploy them, including providing batteries to those in Zone 4, which we know
8 keeps customers safe while we are restoring the lines.

9 Mr. Buxton: I have the same experience as Mr. Mills. There is a customer on
10 Upper Notch Road in Bristol that stands out as we have been working to help him
11 through storm hardening. But in order to help him, and all his neighbors, we need a
12 whole circuit approach. Partial work on some sections does not solve it comprehensively.

13 **Q11. Can you describe further your interactions during storms with customers who have**
14 **storage versus those who do not?**

15 A11. Yes, there are lots of customers in our districts who have installed battery storage in their
16 homes. We move quickly to repair damage everywhere, but you can tell those who have
17 storage are not as worried about the timing since they're able to keep critical devices on
18 while we make the repairs. Customers with energy storage are patient and satisfied. We
19 hear from even more customers who are wanting to get energy storage. Seeing the
20 experience of these storage customers in contrast to those customers who are
21 experiencing multiple significant outages is difficult because we know we have the tools
22 to make it so that all our customers are able to ride through bad weather in a similar way.

1 We need to move faster for those customers who are not yet located on a hardened circuit
2 or helped by storage.

3 **Q12. Do you have any concluding thoughts to share about this petition?**

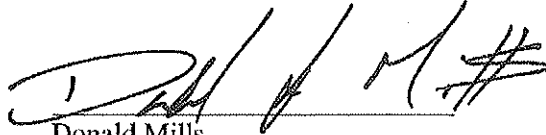
4 A12. Yes. We want regulators to know that we are able to get this work done for customers,
5 but we have to be able to do more of it. We both have areas in our districts that used to
6 experience many outages and now have limited to zero outages. We are eager to get this
7 done for all our customers because we have the solutions that work. We want to
8 implement these improvements now and so do our teams.

9 **Q13. Does that conclude your testimony today?**

10 A13. Yes, it does.

I, Donald Mills, declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at 3:30pm, Vermont this 15th day of April 2024.
Brattleboro


Donald Mills

I, Kyle Buxton, declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Middlebury, Vermont this 15th day of April 2024.



Kyle Buxton