

**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 rate plan

**PREFILED DIRECT TESTIMONY OF
CAROL M. FLINT
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE**

March 15, 2024

Summary: My testimony discusses Green Mountain Power Corporation's ("GMP" or "Utility") Service Quality Reliability Plan ("SQRP"). The conclusion is that GMP's SQRP requires updates notwithstanding, but especially within the context of, GMP's Zero Outages Initiative ("ZOI"). I recommend changes in SQRP metrics that would allow regulators to better evaluate, and provide for, equitable outcomes for GMP's ratepayers.

Ms. Flint Sponsors the Following Exhibits:

Exhibit DPS-CMF-1	Commission Order, Docket No. 8231, July 23, 2014
Exhibit DPS-CMF-2	GMP SQRP, Revised August 8, 2014
Exhibit DPS-CMF-3	GMP 5-year Service Quality Compensation Metrics

1 **Q1. Please state your name and occupation.**

2 A1. My name is Carol Flint. My occupation is Director of Consumer Affairs and Public
3 Information (“CAPI”) for the Vermont Department of Public Service (“Department” or
4 “DPS”).

5 **Q2. Please describe your educational background and experience.**

6 A2. I hold a Bachelor of Arts with a focus in sociology from Norwich University (Vermont
7 College). I joined the Department as the CAPI Director in February of 2016. Currently, I
8 manage the Administrative Services and CAPI Divisions.

9 **Q3. Have you previously testified before the Vermont Public Utility Commission**
10 **(“Commission”)?**

11 A3. Yes. I have provided testimony previously in several dockets and most recently in Case
12 No. 23-2861-PET.

13 **Q4. What is the purpose and focus of your testimony in this proceeding?**

14 A4. My testimony focuses on GMP’s SQRP, the utility’s reporting compliance, consumer
15 complaints about service reliability, and considers additional metrics that may better
16 demonstrate the Utility’s service quality performance within the context of GMP’s ZOI.
17 The purpose of my testimony is to make recommendations for modernizing and improving
18 GMP’s SQRP, with a focus on including metrics to evaluate and ensure equitable outcomes
19 for customers. Such updates are warranted, even absent the GMP ZOI, but are especially
20 needed if the ZOI is approved.

21

1 **Q5. When was GMP's SQRP last updated?**

2 A5. GMP's SQRP was last revised August 8, 2014, and is provided as **Exhibit DPS-CMF-2**.

3 **Q6. What concerns do you have about GMP's SQRP?**

4
5 A6. GMP's SQRP was updated following the merger of GMP and Central Vermont Public

6 Service Corporation. The GMP SQRP needs modernization and a review of the customer

7 service metrics even absent consideration of the GMP ZOI. I recommend that the SQRP

8 be updated to expressly require a service quality compensation report, as the requirement

9 to file such reporting is currently implied and, therefore, unclear. Significantly, the SQRP

10 does not address service quality standards, reporting, and penalties for a zero-outage

11 scenario – nor was such a scenario contemplated at the time the plan was written. Further,

12 service guarantees and service compensation are capped without being tied to a percentage

13 of revenue.

14 **Q7. Has GMP met its service quality reporting metrics?**

15 A7. Yes, GMP has met its service quality reporting metrics. The utility demonstrates excellent

16 customer service according to the service quality standards set forth in its SQRP.

17 **Q8. How are outages reported in service quality reports?**

18 A8. Outages are included once annually in the fourth quarter report by GMP in two metrics –

19 the System Average Interruption Frequency Index (“SAIFI”) and the Customer Average

20 Interruption Duration Index (“CAIDI”). GMP has met its metrics for the past five years

21 reviewed. However, the SQRP reporting metric allows for the utility to report its SAIFI

22 (average number of customer power interruptions) and CAIDI (average outage duration)

1 metrics excluding major storms. If the Utility were to include major storms in its SQRP
 2 reports, it would not have met its performance metrics five times in that many years.¹

		2019		2020		2021		2022		2023	
		SAIFI	CAIDI	SAIFI	CAIDI	SAIFI	CAIDI	SAIFI	CAIDI	SAIFI	CAIDI
Green Mountain	SQRP Standard	2.40	2.70	2.40	2.70	2.40	2.70	2.40	2.70	2.40	2.70
Power Corp. -	Rule 4.900 "all in"	2.02	3.92	1.97	2.28	2.25	2.43	2.77	5.84	2.51	5.20
Merged	SQRP w/exclusions	1.46	1.93	1.97	2.70	2.08	2.16	1.97	2.37	1.61	2.31

3
 4 The SQRP service guarantees and service quality compensation calculations also allow for
 5 storms to be excluded. GMP was at or below baseline metrics annually for the past five
 6 years for areas that trigger service guarantees and service quality compensation and,
 7 therefore, paid none and reported none. The prefiled direct testimony of my colleague at
 8 the Department, Mr. Bill Jordan, provides an engineering perspective regarding these
 9 issues and describes GMP’s SAIDI and CAIDI metrics under both the GMP SQRP and
 10 Commission Rule 4.900 in depth and covers a longer time range.²

11 **Q9. Have GMP customers made complaints to the Department about service outages?**

12 A9. GMP’s customers have made 45 complaints about service outages since July 1, 2018.
 13 There were six complaints made in 2023 and five complaints made in 2022.

¹ See generally **Exhibit DPS-CMF-3**.

² Commission Rule 4.900, effective 11/01/2000, <https://puc.vermont.gov/document/commission-rule-4900-electricity-outage-reporting>.

Row Labels	Count of Complaint Type
	3
Billing	190
Business practice	168
Change order	8
COVID Bill Assist	29
CPG	6
Delivery of service	36
Deposit	9
Disconnection	229
Facilities	86
Fees	54
ICE	1
Inflation Reduction Act	1
IVR	7
JUSTICE	1
Line extension	20
Other	45
Payment Arrangement	265
Rate	43
Repair	12
Service Order	13
Service Outage	45
Smart Meter	11
Uninvestigated	1
VCAAP	362
Grand Total	1645

1 **Q10. Regarding energy equity, what analysis and reporting could help monitor GMP's**
 2 **strategic ZOI to avoid the potential for energy inequities?**

3 A10. The Department recommends that GMP consider analysis of energy burden, equity,
 4 rurality, and community resilience given the significant investment in ZOI. The average
 5 rate increase projected on an across-the-board basis due to the ZOI does not adequately
 6 demonstrate the relative impact on vulnerable customers, such as households with low
 7 incomes. Additional analysis could provide such currently lacking insights into who is
 8 paying most for, and who is benefiting from, the timing and location for ZOI-funded
 9 investments.

10 **Q11. What specific recommendations do you make?**

1 A11. The Department recommends that GMP work with the Department to revise its SQRP and
2 submit it to the Commission for consideration and approval within six months of the final
3 order for this case. I specifically recommend that several edits be made. These updates
4 include the requirement that GMP report its service compensation calculations annually on
5 or before April 15th of each year. Service guarantees and service quality compensation
6 values including the cap should also be modernized to address current monetary values,
7 i.e. inflation. The SQRP should be updated at least once every three years during the ZOI
8 investment period. Metrics must be established, and reported on, for energy burden, equity,
9 and community resilience. These metrics will be exempt from service guarantees and will
10 not be included in service quality compensation point calculations. Moreover, revised
11 SAIFI and CAIDI metrics should be established (as discussed in the testimony of Mr.
12 Jordan). Annual reporting of SAIFI and CAIDI metrics should no longer exclude major
13 storms. Moreover, service quality compensation points calculations would also no longer
14 exclude major storms. In addition to the changes described for the SQRP, the Department
15 also recommends annual reporting that describes how the Utility has planned for and
16 implemented equitable investments in rural and otherwise disadvantaged areas.

17 **Q11. Does that conclude your testimony?**

18 A11. Yes, it does.