

**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)

**PREFILED REBUTTAL TESTIMONY OF
TIANA SMITH
ON BEHALF OF GREEN MOUNTAIN POWER**

April 15, 2024

Summary of Testimony

Ms. Smith describes the work she leads at GMP supporting customers and communities day-to-day and during storms. She explains how GMP is deploying storage and other equipment for customers to provide safety and resilience and why the Zero Outages Initiative is critical. As GMP’s customer service leader, she addresses comments by the Department of Public Service witnesses regarding equity and responds to Department recommendations regarding GMP’s Service Quality Reliability Plan.

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GMP-TS-1	Example Customer Communications, April 2024 Storm
GMP-TS-2	Example Community Presentations (Discovery Attachments GMP.DPS1.Q121(a) & (b))

**PREFILED REBUTTAL TESTIMONY OF
TIANA SMITH
ON BEHALF OF GREEN MOUNTAIN POWER**

I. Introduction

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

2 A1. My name is Tiana Smith. I am GMP's Leader of Customer Care, Electrification, and
3 Sustainability.

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

5 A2. No, I have not previously submitted testimony in this proceeding.

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

7 A3. I describe how GMP supports customers and communities day-to-day and during storms.
8 I explain how our programs for storage, heating, and transportation provide safety and
9 resilience, promote equity, and help customers get off dirty, expensive fossil fuels, and
10 why the Zero Outages Initiative (ZOI) is critical to these efforts. It is clear customers
11 want and need reliable energy, from our own communications with them and as shown
12 by data the Department of Public Service (Department) has presented. I also specifically
13 respond to comments by the Department regarding equitable service for customers and to
14 Department recommendations regarding GMP's Service Quality Reliability Plan (SQRP).

15 **Q4. Please describe your background and your role at GMP.**

16 A4. I grew up in rural areas in Alaska and Colorado, and I have worked at community-
17 focused energy companies collaborating closely with customers throughout my career. In
18 Colorado, I was Customer Accounts Manager for a small municipal electric utility, Fort

1 Collins Light and Power. That system has over 99% of its lines underground, with
2 99.99% reliability – meaning hardly any outages for customers, ever.¹ In that role, I led a
3 team that helped manage relationships with customers to access programs, understand
4 rates, and all service needs. I moved to Vermont with my family in 2017 and worked for
5 4 years at Vermont Gas Systems, first as Energy Services Manager managing the EEU
6 team, and later leading their strategy around decarbonization. While there, I led programs
7 that helped customers cut carbon including through heat pump electrification.

8 I joined GMP in 2022 to focus on electrification and sustainability programs and
9 in 2023 I also became GMP’s leader for customer care. At GMP, I speak with customers
10 and community leaders every day. I am the point person for many of our customer
11 programs that provide heat pumps, electric vehicle (EV) equipment, and storage. For
12 example, I am working with customers directly on installations of residential storage
13 systems for the Grafton Resiliency Zone pilot that is a model for the ZOI. I also run
14 GMP’s EV transformation efforts on public, workplace, and multifamily charging. For
15 storm preparation and restoration, I am GMP’s main contact with community leaders and
16 emergency planners, and I coordinate GMP’s response to critical care customers during
17 storms, in addition to coordinating our call center. In those roles, I attended and presented
18 at many of the community forums GMP held leading to this filing and have had countless
19 conversations regarding our efforts to stop outages and bring resilience to all customers,
20 with a focus on the most rural areas.

¹ See <https://www.fcgov.com/utilities/what-we-do/light-power>.

1 I received a bachelor's degree in English from Colorado State University and
2 became a certified Project Management Professional in 2014.

**II. The Connection Between Electrification and Resilience and the Critical Role of ZOI
for Customers**

3 **Q5. You lead implementation of GMP's customer programs and customer service, and**
4 **you also coordinate GMP's storm planning and response with communities. Is there**
5 **a connection between those roles?**

6 A5. Yes, absolutely. When I joined GMP to help lead electrification and sustainability
7 programs, I was excited to help customers transition off fossil fuel to more affordable and
8 clean electricity. What I came to understand very quickly is just how critical not only
9 day-to-day reliability, but also long-term resilience is for our customers, because storms
10 driven by climate change are creating damage with more frequency. Customers need a
11 grid that serves their needs at all times, and they need solutions to keep them powered up
12 even when storms or other events cause damage to the grid.

13 I have been hyper-focused with individual customers on exactly what they need to
14 transition to a heat pump, to make their homes more affordable and efficient, to cut their
15 reliance on gasoline by switching to an EV, and to get the safety of battery back up in
16 their homes. Customers everywhere rely on electricity more and more in their daily lives
17 for work, for school, for medical services, and to stay connected to their friends and
18 family. It is key to their safety and quality of life, and that is why coordinating with
19 communities on storm planning and response is directly a part of providing customers
20 what they need. With storms hitting with greater frequency and ferocity especially in

1 rural areas, the traditional cycle of storm-repair-repeat is not equitable or sustainable; we
2 must do more in the face of climate change to help keep all customers in all communities,
3 and our colleagues who brave the weather to repair damage, safe and secure.

4 **Q6. How is GMP's ZOI connected to providing equitable service?**

5 A6. The ZOI is about meeting all customers' needs, all the time, regardless of their
6 circumstances or location. It is rooted in equity – putting the work where it is needed
7 most. We can put lines in vulnerable rural locations underground and harden mainline
8 feeders with spacer cable and technology to create backup feeds, to provide highly
9 reliable service to these customers just like we do for customers in our more populated
10 areas. Most customers in places like Williston or South Burlington experience only an
11 occasional outage, few and far between, even during storms because much of the system
12 is underground, main lines are newer and many are storm hardened, and there is feeder
13 backup in many locations. Their neighbors just a few towns over or in other areas of
14 Vermont, on rural lines, have a much different experience when the weather hits. While
15 this has been true to some extent since the grid was first built, it is increasingly more and
16 more important to address due to, among other things, the frequency of extreme weather
17 and the disproportionate impact of this extreme weather on Vermont's rural communities.

18 Our ZOI plan is designed to directly address reliability, equity, and affordability,
19 and will ultimately strengthen the system and enable more local renewable energy.
20 Customers want reliable and affordable electric service. I hear this over and over again in
21 my conversations with customers all over the state. Additionally, the Department's
22 research for their Renewable Energy Standard report supports this conclusion. Customer

1 polling found that when prompted to focus on renewable energy and how Vermont gets
2 its electricity, customers named reliable service as “very important” more than any other
3 (87%), closely followed by affordability (82%).² We are pursuing the ZOI exactly for
4 those reasons. It is not affordable or sustainable for customers to have the very
5 significant, repeated costs of repairing climate-driven storm damage. In addition, a
6 resilient electric grid is key to supporting customers’ transition to clean, more affordable
7 electricity for heating and transportation.

**III. GMP’s Collaboration with Customers and Communities Led to the ZOI Petition to
Provide Customers What They Need**

8 **Q7. You mentioned the conversations GMP has had with customers on these topics; can
9 you provide some detail about the customer conversations you are referring to?**

10 A7. We have tens of thousands of conversations with our customers each year. In 2023, GMP
11 customer service representatives had more than 163,000 phone conversations with
12 customers. In 2023, more than 25,000 (15.3%) of those calls were initiated because of
13 outages. In just the damaging April storm earlier this month, we had more than 19,000
14 phone calls from customers. These are just the direct calls from customers – we also
15 texted and communicated with customers thousands of times in each storm through
16 email, our website, the GMP app and social media.

² The Department’s report on the polling (“Vermont Weighs In”) is available here:
<https://publicservice.vermont.gov/sites/dps/files/documents/VT%20Weighs%20In%20Report%20MPG%20for%20Vermont%20PSD%2010.3.23.pdf>. When “very important” and “somewhat important” are combined, affordability (99% combined) and reliability (97% combined) were again the top two priorities for customers.

1 Our customer service team members know that some of the calls they take will be
2 tough, pointed conversations with Vermonters who have endured multiple severe storms
3 in hard-hit communities. Our team works through the discussions with compassion and
4 information. I routinely have these conversations with customers myself, taking calls
5 each storm as I help work through the most difficult situations, including with our critical
6 care customers. When our Critical Care team proactively reaches out to check in with
7 customers, some of the best calls are with customers who already have storage onsite that
8 can ride through these events. We can check on the status of their battery charge and if
9 necessary give them helpful tips on extending the battery while field crews restore
10 customers.

11 It is not just me and the customer care team helping our customers during these
12 tough events. Employees across the company all take on storm roles for customers and
13 are also regularly talking with customers as part of doing their jobs day to day. From the
14 CEO and leadership team, to line workers, designers, and other members of the Field
15 Operations team, to the Generation team, and the Energy Innovation team, we are all
16 talking with customers and community stakeholders every day –and we know that
17 reliability and affordability are key for them, especially with the increasing frequency and
18 severity of climate-driven storms and the state’s goals to reduce carbon emissions by
19 switching away from fossil fuel.

1 **Q8. You mentioned the recent April storm that caused significant damage; can you give**
2 **us more detail regarding what customers experienced?**

3 A8. As Mr. Burke shared in his rebuttal testimony, the storm that hit Vermont started with
4 severe high winds before switching to a large heavy wet snowstorm that knocked out
5 power for over 87,000 customers, making it the 10th worst storm in GMP history. For
6 some customers, this caused a multi-day outage event.³ In our hardest hit districts, we
7 heard from many customers on our critical care list or who are vulnerable – recently
8 home from the hospital, caring for a newborn or their elderly parents, and battling cancer.
9 All those factors limit their ability to relocate during an event.

10 We proactively reach out to customers before the storm and connect with
11 customers when they call in to check if they are okay or need assistance from a town
12 emergency management director or medical services, or if we can provide a portable
13 battery to assist with oxygen devices and other critical equipment. In the April storm
14 alone, I spoke with dozens of vulnerable Vermonters who depend on electricity to power
15 their medical devices.

16 As an example, an elderly customer in Winhall on oxygen without backup who
17 had borrowed a GMP Jackery portable power system in a previous damaging storm
18 hoped we could give her “the red box” again to help her oxygen last. We coordinated
19 with one of our teammates in that district to bring the Jackery to the customer’s home, set
20 it up, and show her how to use it. I also helped coordinate a delivery to an elderly woman

³ See GMP-MB-10.

1 with cancer in West Haven on a nebulizer whose son had called me from out of state,
2 worried about his mother who was isolated during the storm. Another customer had just
3 been released from the hospital for surgery and was worried about staying warm and
4 clean. The Jackery we delivered to him in Royalton would also allow him to charge his
5 phone so he could call family and emergency services if needed.

6 Most of the feedback and the need for support from customers came within hours
7 of outages starting, and only ramped up from that point on. **Exhibit GMP-TS-1** contains
8 snapshots of several communications with vulnerable customers during the recent storm
9 and our response (redacted to protect customer identification, contact, and account
10 information). These are consistent with what we see whenever there is a multiday event –
11 customers do not have reliable backup or support, and electricity is a critical resource in
12 their lives. Further, many do not have the financial resources or physical ability to install
13 and keep up with a generator. Energy storage is seamless, as Mr. Castonguay’s testimony
14 highlights, and keeps customers powered up while the rest of the grid is repaired.

15 **Q9. Mr. Burke’s initial testimony mentioned dozens of community meetings GMP held**
16 **in rural areas of Vermont as it developed the ZOI; can you describe those further?**

17 A9. Storm restoration at GMP includes proactive and frequent outreach to town officials,
18 emergency managers, and customers who require electricity for life saving medical
19 equipment. During outreach over the storms in late 2022 and early 2023, it became clear
20 that customers and communities are unprepared for the impacts of climate change driven
21 storms particularly with road blockages from trees and heavy snow and other access
22 challenges that come with these weather events. It is imperative to help Vermonters better

1 understand how weather patterns are changing, how our restoration efforts work, and our
2 plan to address the impacts of climate change from these storms.

3 In 2023, prior to the ZOI filing in October, GMP team members attended dozens
4 of public meetings and events to talk about storm trends, planning, response, and
5 resiliency projects. I went to many of these meetings to talk with community members
6 and leaders. The focus of these gatherings was squarely on how GMP can partner with
7 the communities we serve on what we are doing to respond to the escalating severe
8 weather as well as how communities can plan and be more resilient. We focused on the
9 hardest-hit areas from last winter's storms, targeting town selectboards, regional planning
10 commissions, town energy committees, and presenting at conferences focused on
11 emergency preparedness. We tailored each discussion to the community we were talking
12 to. For an example, *see* **Exhibit GMP-TS-2**, which are presentation slide decks we
13 provided to the Department in discovery to illustrate our outreach.⁴

14 We went to speak in-person, not over video, whenever possible and these
15 meetings included our operations lead, the local district operations supervisor (OS), and
16 me as the leader of town communications regarding storm planning and response. These
17 30+ meetings with hundreds of participants enabled us to hear from customers and from
18 leaders in towns and their constituents, and strengthened our resolve that the plan for our
19 Zero Outages Initiative is not only prudent but critical to keep Vermonters safe in
20 increasingly more severe and damaging storms. While towns are unique both

⁴ The list of meetings and example presentations were provided to the Department in discovery as A.GMP-DPS1.Q121.

1 geographically and infrastructure-wise, the zone approach of the ZOI applies equitably
2 across all communities and can be tailored to individual town needs, i.e. critical
3 infrastructure that could be included in a microgrid and serve as a warming shelter during
4 emergencies. The list below represents the community engagement that informed the ZOI
5 design and Petition:

- 6 • Windham Region Resiliency Project Meeting January 24, 2023
- 7 • Addison County Emergency Managers Meeting February 8, 2023
- 8 • Bethel Selectboard March 27, 2023
- 9 • Bethel Energy Committee March 28, 2023
- 10 • Wardsboro Community Meeting April 3, 2023
- 11 • Newfane Selectboard Meeting, April 3, 2023
- 12 • Brattleboro Emergency Managers, April 10, 2023
- 13 • Chester Selectboard Meeting, April 17, 2023
- 14 • Grafton Selectboard Meeting, April 17, 2023
- 15 • Windsor Resiliency Zone Meeting, April 19, 2023
- 16 • Dummerston Selectboard Meeting, April 19, 2023
- 17 • Townshend Selectboard Meeting, April 25, 2023
- 18 • Vermont Emergency Management, May 4, 2023
- 19 • Jamaica Selectboard Meeting, May 8, 2023
- 20 • VT Warn Conference, May 11, 2023
- 21 • Chittenden Regional Planning Commission, May 17, 2023
- 22 • Guilford Selectboard Meeting, May 22, 2023
- 23 • Mt Ascutney Regional Planning Commission, June 6, 2023
- 24 • Rockingham/Bellows Falls/WRC Meeting on Resiliency Zones, June 19, 2023
- 25 • Rutland Regional Planning Commission, June 28, 2023
- 26 • Guilford meetings with school, Town officials on Resiliency Work and potential
27 microgrid, multiple dates throughout 2023 and 2024
- 28 • Vermont Emergency Preparedness Conference, September 21, 2023
- 29 • Presentation to Vermont League of Cities and Towns Fair, September 26-27, 2023
- 30 • Groton Town Selectboard, September 27, 2023
- 31 • Franklin County Regional Emergency Managers Commission, September 28, 2023
- 32 • Woodstock Town Manager meeting, October 16, 2023
- 33 • Wells Town Manager meeting, October 18, 2023
- 34 • Brandon Town officials meeting, October 23, 2023
- 35 • Brandon Energy Committee, November 2, 2023
- 36 • US EPA Vermont Power Resiliency Workshop for Vermont Water Utilities,
37 November 7, 2023

- 1 • Halifax Community Meeting, December 14, 2023
- 2 • Whitingham Senior Meal, December 14, 2023
- 3 • Tunbridge Town Hall Long Term Outage Preparedness Meeting, January 18, 2024
- 4 • Wake Robin Energy Committee, January 20, 2024
- 5 • Grafton Open House on Resiliency Zone, March 21, 2024

6 In addition, in 2023 prior to the ZOI filing, GMP teammates also met with
7 Vermonters in Underhill, Windsor, Ryegate, Pawlet, Poultney, and Hartford to talk about
8 resiliency work and planning. Since the filing, we have had more than a dozen
9 community meetings, all as outlined in the list above.

10 The feedback at every one of these meetings was overwhelmingly positive,
11 recognizing the ferocity of the storms that have hit Vermont and caused damage in
12 communities statewide. The most common questions we received were how quickly and
13 when will more work start, the specific plan for each town, and how can towns
14 collaborate with GMP on these efforts. Time was of the essence and what they wanted to
15 know was “when can this happen?” At no point in our outreach and information
16 gathering process did community members question whether this work is needed.

17 **Q10. What other outreach does GMP do to customers and communities?**

18 A10. The list above is just related to the type of work we are proposing in this Petition. We
19 have many, many other avenues of contact with our customers. For example, our Energy
20 Innovation team members participate in EV test drives, energy fairs, meetings with
21 energy committees, and conferences around the state, where customers routinely bring up
22 resiliency in conversation, even when they attend to learn about EVs or heat pumps.
23 GMP also holds two open houses each year for customers and reliability and storm
24 response is part of the discussion. For example, it came up repeatedly during in person

1 conversations with GMP team members at the Open House at our office in Royalton on
2 March 21, 2023, where dozens of customers packed the truck garage, and customers in
3 the surrounding area had endured multi-day outages during an unprecedented string of
4 storms in 2022/23. The same could be said for an emotional meeting in Wardsboro, who
5 were effectively cut off from other areas during an extreme wet snow event in March
6 2023, where in one case, a GMP customer and Wardsboro resident spoke of not even
7 being able to get their house door open, due to over four feet of heavy wet snow.

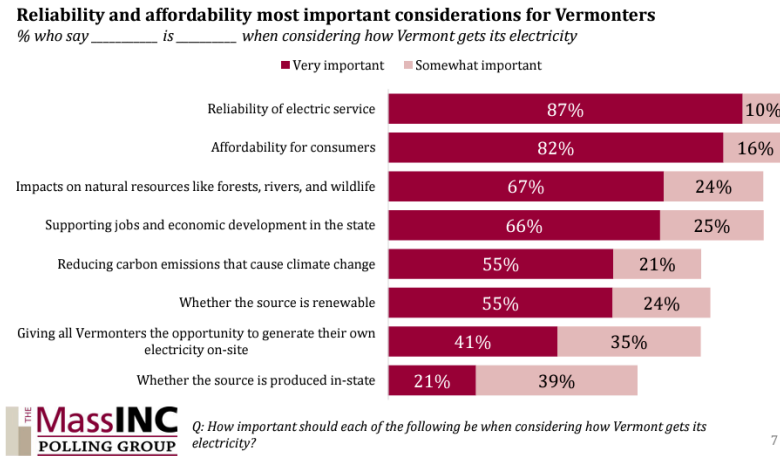
8 **Q11. The Department mentioned its public outreach for legislative reporting on the**
9 **Renewable Energy Standard (RES) as a model for engagement; have you reviewed**
10 **that, and if so, what did you learn about public support for the ZOI Petition?**

11 A11. Yes. The Department’s own research and outreach that it conducted over the summer of
12 2023 also found that reliability is top of mind for Vermonters. In multiple ways, over
13 many months, customers said—when prompted to focus on how Vermont gets its energy
14 and the sources of energy—that they wish for reliable, affordable service.

15 The Department, through MassINC Polling Group, conducted a poll of 700
16 Vermonters as a part of its RES outreach that squarely highlights reliability as a top focus
17 for Vermonters.⁵ The press release regarding the polling put it this way: “When
18 considering how Vermont gets its electricity, reliability of service and affordability for
19 consumers were identified as the two most important factors, with 87% and 82% of

⁵ See the Department’s report on the polling (“Vermont Weighs In”):
<https://publicservice.vermont.gov/sites/dps/files/documents/VT%20Weighs%20In%20Report%20MPG%20for%20Vermont%20PSD%2010.3.23.pdf>.

1 respondents considering them “very important.”⁶ The polling report itself makes this
2 point multiple times in both text and in charts displaying the poll’s results.



3
4 **Q12. Can you share some of the key findings in the public record regarding reliability**
5 **from the Department’s outreach in 2023?**

6 A12. Yes. Several Regional Planning Commissions (RPC) held meetings co-hosted with the
7 Department for the Department’s outreach on RES. The reports of those meetings are
8 available on the Department’s website.⁷ The consistent message across these meetings
9 was that customers are worried about the worsening weather and storms and want help to
10 ensure their electricity stays on and affordable.

11 For example, the Central Vermont RPC report on the RES outreach meetings they
12 conducted in partnership with the Department summarized the feedback from customers:

13 “Reliability and resilience came up regularly in discussion and short
14 answers, with many suggesting or asking questions about different types of
15 back-up/storage resources, the interaction of the RES with microgrids,

⁶ See the Department’s October 3, 2023, press release on the polling:
<https://publicservice.vermont.gov/sites/dps/files/documents/PR%20VT%20Weighs%20In%20-%2010.3.23.pdf>.

⁷ See <https://publicservice.vermont.gov/renewables#Past%20events>.

1 distributed generation, the location of energy resources in floodplains, and
2 a keen awareness that we will be facing increasingly more extreme weather
3 often linked again to a preference for smaller, proximate projects. Some also
4 noted that reliability (as well as affordability) affects people differently,
5 particularly rural communities, those who are electrically dependent
6 medically and/or those who rely on it for work.”⁸
7

8 The Rutland RPC also partnered with the Department on two separate RES
9 outreach meetings, one co-hosted with the local Rutland Area branch of the NAACP to
10 encourage more diverse feedback. Two people attended that meeting, and five people
11 attended the other Rutland meeting. The RPC’s summary of the feedback from the seven
12 attendees across the two meetings was poignant: “I would like to stress that all
13 participants want a reliable, affordable, and sustainable energy system, and feel there is
14 no collective bandwidth to add this to their struggle to survive.”⁹

15 The Windham Regional Commission meetings with the Department regarding
16 RES also found customers prioritizing reliability, with survey respondents placing
17 reliability in the top three most important factors. Among the core takeaways: “Invest in
18 better electricity infrastructure to accommodate a growing load. Also invest in battery
19 storage options so that electricity can be used by consumers when they most need it
20 (during outages, etc.)”¹⁰

⁸ See page 9 of that report here:

<https://publicservice.vermont.gov/sites/dps/files/documents/CVRPC%20RES%20Event%20Summary.pdf>.

⁹ See page 3 of that report here:

<https://publicservice.vermont.gov/sites/dps/files/documents/RRPC%20RES%20Event%20Summary.pdf>.

¹⁰ See page 12 of this report here: <https://publicservice.vermont.gov/document/windham-regional-commission-event-summary-september-2023>.

1 Direct quotes from other anonymous RES meeting participants across the state
2 also echo the need for a reliable, affordable, sustainable energy system. For example,
3 from the Central Vermont RPC report:¹¹

4 “I am fortunate to be a GMP customer. They have been ahead of the curve
5 in developing and promoting distributive solar as a means of delivering
6 reliable electricity. We signed on to net-metering a number of years ago and
7 took advantage of the programs to install solar. We also were early adopters
8 of the Tesla battery backup system. It has demonstrated itself, most recently
9 during the Dec. 2022 storm/outage. Our neighbors were struggling with gas
10 generators, getting gas sometimes became an issue as well as multiple days
11 of tending a generator. We were barely aware of the outage, the battery went
12 for nearly 2 days and was still at about 50% during a pretty cloudy period
13 of time. We were free to help our neighbors and not worry about our house.
14 I know affordability is an issue. We have benefited from generous tax
15 incentives and incentives from the power company. We would be quite
16 willing to pay more to ensure the same security to everyone.”

17
18 “I have solar from sun commons and a power wall rental from GMP at
19 home. Looking to install more as climate volatility is going to become a
20 worse issue.”

21
22 “[T]hose microgrids on the news the other day—so that when we have big
23 storms won’t have so many outages—let’s do more of that.”
24

25 **Q13. Turning to Ms. Margolis’s testimony, do you share her opinion that more time and**
26 **planning is needed to devise solutions for customers that understand and respond to**
27 **their needs in the most beneficial and cost-effective way?**

28 A13. No, we have the solutions and have already been deploying them. Now we need to
29 accelerate this work. Customers want help today to avoid outages the next time severe
30 weather hits, not potentially years from now, as the Department suggests. The longer we

¹¹ See pages 45-53 of this report here:
<https://publicservice.vermont.gov/sites/dps/files/documents/CVRPC%20RES%20Event%20Summary.pdf>.

1 wait to provide improved reliability through the three-pronged ZOI approach, the more
2 risk there is for Vermonters, including increased, unsustainable costs to maintain the
3 current system in light of the fierce, damaging storms, including devastating storms we
4 have experienced since we made the ZOI filing in October 2023.¹²

5 Instead, deploying these solutions comprehensively as outlined in our filing and
6 building in transparent and key reporting will prove that these solutions work and have
7 the benefit of putting customers on a path to zero outages now. I know this works
8 because I have helped bring some of these solutions directly to customers. We have
9 nearly 30 battery systems, supplied by GMP, installed in Grafton right now, with more in
10 the planning and scheduling phase every day. I am leading that pilot and directly working
11 with customers on the logistics and education related to these systems. The first battery
12 installed there in July 2023 has helped that customer through nearly 20 grid outages to
13 date.

14 Seeing it work in that very rural area, or what we call “Zone 4” in the ZOI, it is
15 clear we need to take this approach throughout our territory, as one of the three-pronged
16 approaches. These are the types of locations where a storage solution is more cost
17 effective than burying every last mile of line. Our ZOI work will respond urgently to the
18 escalating weather threat from climate change with proven solutions that are already
19 working today, while also reducing potential cost impacts for customers of the more
20 frequent storms. The ZOI provides the tested, successful solutions that Vermonters need

¹² See Exhibit GMP-MB-10.

1 (and thousands of Vermonters already have), and additional time and planning will only
2 continue the divide between rural and more populated parts of Vermont, putting
3 customers at risk.

4 **Q14. What about the distinction between “reliability events” and “resilience events” that**
5 **Ms. Margolis discusses; from your work with customers, what is your opinion on**
6 **the importance of that distinction?**

7 A14. All outages beyond a very short duration affect customers, and longer outages can be
8 more impactful. But once outages go beyond about two hours for any customer, we see
9 increased concern from our customers. The April 2024 event discussed above is a great
10 example: outages started early but happened mostly during the overnight on Wednesday,
11 April 3 and into the day on Thursday, April 4. During that day, we saw dozens and
12 dozens of customers with really significant concerns within just hours of the outage.

13 While Ms. Margolis’s framing of less than 24-hour “reliability events” and longer
14 “resilience events,” pulled from the Department of Energy’s Modern Grid Report,¹³ is a
15 way to organize the analysis and review of outage response in an academic or research-
16 oriented way, in my experience it is not at all connected with what we hear from
17 customers day in and day out.

18 What we see is a convergence of things that make it extremely important to shift
19 our thinking from one that plans to accept a certain number of outages or types of impacts
20 to one that eliminates all outages experienced by customers as fast as we can. And we

¹³ See Prefiled Direct Testimony of Anne Margolis at 5.

1 have the solutions that make it possible. The increased severity of storms; the increased
2 reliance on electricity to help decarbonize our lives; and the increased use of technology
3 at home, powered by electricity, to live, work and play – all of these are happening at the
4 same time. What we need to do to help our customers thrive in the years ahead is to
5 deliver an extremely reliable, two-way connected grid for customers to stay powered up.
6 There is a great deal of urgency in getting this enormous, impactful work done that is not
7 addressed by the type of “reliability event” versus “resilience event” approach that the
8 Department’s testimony discusses.

IV. Response to Department Recommendations on Service Quality and Related Issues

9 **Q15. Let’s turn to the Department’s specific recommendations on Service Quality and**
10 **related issues. Ms. Flint makes suggestions regarding GMP’s Service Quality and**
11 **Reliability Plan (SQRP). Can you describe what efforts GMP is undertaking to**
12 **update the SQRP?**

13 A15. GMP’s SQRP, last updated in 2014, requires GMP and the Department to jointly review
14 the Plan every two years to determine if any measurements or performance levels require
15 modification. The most recent review began during GMP’s 2023 Multi-Year Regulation
16 Plan (MYRP) proceeding, with GMP and the Department reporting to the Commission
17 that review was underway with some housekeeping updates contemplated, which would
18 be submitted to the Commission for approval during the term of this MYRP. More
19 recently, GMP notified the Commission that it planned to file the updated SQRP by June
20 1, 2024. As such, GMP and the Department are continuing to discuss plan updates
21 moving towards that June 1 filing. I’m leading a project team that has completed a

1 thorough review of neighboring states' SQRPs and met with teams across safety,
2 metering, and customer service to discuss adjustments that may be needed to improve the
3 customer experience. As Ms. Flint notes, GMP has been meeting the performance
4 standards set under the SQRP while continuing to provide "excellent customer service"
5 and low outage complaints to the DPS. This demonstrates, at a high level, that the SQRP
6 metrics continue to capture GMP's performance as reflected in the customer experience.
7 However, GMP agrees with the Department that improvements can be made to ensure
8 that the SQRP is an insightful and effective tool to continue to assess GMP's level of
9 service, including some of the suggestions made by Ms. Flint in this proceeding. This
10 goes beyond just the reliability metrics, and GMP is working on a draft SQRP update that
11 will be shared with the DPS for review later in April 2024.

12 **Q16. Ms. Flint recommends that the Commission require GMP to file a revised SQRP**
13 **within six months of the final order in this case. How do you respond?**

14 A16. As GMP stated in response to the Commission's requests in Case No. 23-1852-TF, we
15 plan to file a revised SQRP in June 2024.¹⁴ In the proceeding to approve a revised SQRP,
16 many of the suggestions made by Ms. Flint and discussed by me below can be raised and
17 considered by the Commission. Under the current SQRP framework, GMP and the
18 Department would then review the plan after two years, at which point the first ZOI
19 projects will have been online and starting to perform, informing potential future metrics.

¹⁴ See September 22, 2023, Service Quality and Reliability Plan Status Update by Josh Castonguay, filed in response to the Commission's August 23, 2023, Order in Case No. 23-1852-TF.

1 **Q17. Regarding Ms. Flint’s specific recommended updates to the SQRP, does the**
2 **Commission need to decide on those in this proceeding?**

3 A17. No. We agree that many of the recommendations the Department put forward warrant
4 further discussion and consideration for inclusion in GMP’s next update of the SQRP
5 which itself will be subject to Commission approval. As Ms. Flint recognizes and I
6 discuss below, many of these plan revisions do not specifically relate to GMP’s ZOI.¹⁵
7 Therefore, Ms. Flint’s specific recommendations ought to be considered in connection
8 with approval of the SQRP itself with the benefit of additional collaboration between
9 GMP and the Department. That proceeding would also have the benefit of following or
10 aligning with the Commission’s determination in this case.

11 **Q18. Turning to Ms. Flint’s five specific recommendations, the first is to impose a specific**
12 **requirement that GMP report service compensation calculations annually each**
13 **April. How do you respond to this proposed requirement?**

14 A18. While GMP does not agree that it is implied in our current SQRP that this be filed
15 annually as she concludes, this request is a reasonable change that should be discussed
16 further and can be implemented while updating the SQRP. In that discussion, GMP
17 would propose a date aligned with other SQRP reporting such as our annual report under
18 that plan that is due January 31st of each year along with our MYRP reporting, unless
19 there is a specific reason for the April filing date she suggested.

¹⁵ See Prefiled Direct Testimony of Carol Flint at 3-4.

1 **Q19. Second, Ms. Flint recommends that service guarantees, and compensation values**
2 **should be “modernized” to reflect inflation since these values were set. What is your**
3 **view of this suggestion?**

4 A19. Here too we agree that this should be a topic addressed when updating the SQRP. The
5 compensation values should be set to an appropriate value which can be discussed further
6 with the Department and determined in that proceeding.

7 **Q20. Third, Ms. Flint recommends that the SQRP be updated at least once every three**
8 **years during the ZOI period. Is this appropriate?**

9 A20. GMP agrees that a SQRP should have a process for review and updates as needed, the
10 exact timing of which should be a specific topic of conversation in revising the current
11 SQRP. The existing SQRP currently requires review every two years and allows either
12 GMP or the Department to petition for additional changes at any time. Our view is that
13 this approach is more appropriate because it encourages regular discussion on whether
14 changes are needed with flexibility to modify the plan at any time. This approach requires
15 the parties to come to the Commission only when changes are needed while retaining a
16 regular cadence of plan review and should be continued.

17 **Q21. Fourth, what is your response to Ms. Flint’s recommendation that metrics should be**
18 **established for energy burden, equity, and community resilience?**

19 A21. GMP agrees these are very important considerations to track and inform our ZOI work.
20 As I discussed above, addressing community resilience and equity is a core motivating
21 factor for beginning the ZOI and is deeply reflected in the way we approach this work.

1 However, this category of metrics should be tracked within their own context,
2 outside of the SQRP, such as in the MYRP annual metrics which currently have
3 categories focused on income sensitive programs or in the ZOI reporting itself, as we
4 propose here.¹⁶ . These metrics and the outcomes they encourage are hard to translate into
5 concrete, inflexible service quality metrics for many reasons.

6 For example, energy burden relates to a wide range of energy use, much of which
7 is not electric and would not be known to GMP either for measurement or as a
8 controllable outcome. The purpose of the SQRP is to measure GMP's service quality, and
9 the values identified by Ms. Flint are often the result of larger societal and political
10 factors and not directly reflective of service quality outcomes. Therefore, including many
11 of these metrics in the SQRP would not help GMP improve outcomes but instead simply
12 further identify areas of known need. Monitoring these categories should be a priority
13 throughout Vermont, including in the deployment of ZOI projects, but does not appear to
14 add distinct value to SQRP reporting for customers.

15 **Q22. Relatedly, Ms. Flint recommends that in addition to the SQRP, GMP should report**
16 **annually on how it is planning for implementing equitable investments in rural and**
17 **otherwise disadvantaged areas. Is there an opportunity to report on equity outside**
18 **of the SQRP?**

19 A22. Yes. Broadly speaking, in addition to the reporting I discussed above in our annual
20 MYRP, we also will incorporate the plans and outcomes of our efforts to increase equity

¹⁶ See **Exhibit GMP-MB-17**, discussed in detail in Mr. Burke's rebuttal testimony.

1 for customers in our Integrated Resource Plan every three years. The ZOI itself is GMP's
2 overarching plan to implement equitable investments in these rural and disadvantaged
3 areas, prioritized by those areas that are experiencing the greatest resiliency challenges.
4 GMP's ZOI project screening criteria, developed with the DPS as part of GMP's Climate
5 Plan and described in detail in Mike Burke's testimony, identifies and deploys projects
6 into these areas first.

7 Ultimately, the ZOI when done will also advance equity when all customers can
8 experience reliable, resilient access to power and GMP's energy programs regardless of
9 location, and we will move toward that outcome with a deliberate focus through this plan
10 to address the most vulnerable areas first. In furtherance of this goal, reporting and
11 tracking progress as Ms. Flint suggests is useful. During the annual ZOI project reports as
12 part of GMP's annual base rate filing, GMP will describe how the ZOI projects are
13 selected to implement equitable investments as Ms. Flint recommends.

14 **Q23. Fifth, Ms. Flint recommends that the SQRP no longer exclude outage data and**
15 **statistics from Major Storm events. How do you respond?**

16 A23. As described in detail in Mr. Burke's rebuttal testimony, there are very good reasons for
17 Major Storms to be excluded from GMP's SQRP reporting because those reports show
18 whether GMP is maintaining excellent day-to-day service in a way that not only allows
19 our own performance to be tracked over time, but also allows the Commission and
20 customers to see how GMP compares to utilities elsewhere in the region and even around

1 the country. Mr. Mara notes that in his testimony for the Department.¹⁷ That should
2 continue in future updates to the SQRP. Major storms are damaging, volatile events—
3 reporting on how we respond is appropriate, as Mr. Burke covers, but not in our SQRP.
4 Penalties that are based on metrics that include Major Storm would be arbitrary and
5 inappropriate at this time too, as we are just embarking on the ZOI work. The better
6 alternative, presented by Mr. Burke, is to supplement the annual reporting we already do
7 with ZOI-specific circuit data, both with and without Major Storms included, so that we
8 can all plainly see evidence of progress on this critical initiative for customers.

9 **Q24. Does that conclude your testimony in support of GMP's rebuttal?**

10 A24. Yes, it does.

¹⁷ Prefiled Direct Testimony of Kevin J. Mara at 7.

I, Tiana Smith, 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 163 Acorn Lane, Colchester, Vermont this 15th day of April 2024.

Tiana Smith

Tiana Smith