

**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	
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**THIRD SET OF INFORMATION REQUESTS
SERVED UPON GREEN MOUNTAIN POWER CORPORATION
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Erin C. Brennan and Alex Wing, hereby serves this Third Set of Information Requests on Green Mountain Power Corporation (“GMP”), in accordance with Vermont Public Utility Commission (“Commission” or “PUC”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that GMP answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than April 30, 2024. Please provide GMP’s answers in electronic format (i.e. word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as GMP is able to provide an answer or production. In other words, GMP should not withhold a response to any requests for which it has responsive data, documents, etc. until GMP is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires that the response to each request is to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of said response. When responding to each request please state: (1) the name(s) and title(s) of the person(s) responsible for preparing the response; (2) the

administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). GMP must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to GMP. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of GMP's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by GMP, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that GMP believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

10. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

11. To expedite the discovery process and the resolution of this case, if GMP wishes to have clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

12. The Department reserves the right to submit additional information requests to GMP.

DEFINITIONS

13. “Identify,” when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.

14. “GMP,” as used herein, shall refer to Green Mountain Power Corporation.

15. “Document,” as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. “Document” shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

16. “Petition” shall mean GMP’s Petition and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

17. “FY” means Fiscal Year.

18. “COS” means Cost of Service.

19. “ROW” means right of way.

20. “ZOI” means GMP’s Zero Outages Initiative.

21. “SAIDI” means System Average Interruption Duration Index.

22. “CAIDI” means Customer Average Interruption Duration Index.

23. “SAIFI” means System Average Interruption Frequency Index.

24. “MYRP” means GMP’s Multi-Year Regulation Plan.

25. “IRP” means an Integrated Resource Plans under 30 V.S.A. § 218c.

26. “BESS” means Battery Energy Storage System.

27. “ESS” means Energy Storage Systems.

28. “Bring Your Own Device” means GMP’s Bring Your Own Device tariff.

29. “RZ” means both a GMP Resiliency Zone.
30. “EV” means electric vehicle.
31. “GRIP” means Grid Resilience and Innovation Partnership under the U.S. Department of Energy’s Grid Deployment Office.
32. “DOE” means the United States Department of Energy.
33. “OCED” means the DOE’s Office of Clean Energy Demonstrations.
34. “NOMAD” means Nomad Transportable Power Systems.
35. “O&M” means Operations and Maintenance.
36. “FERC” means the Federal Energy Regulatory Commission.
37. “IBR” means inverter-based resources.
38. “T&D” means Transmission and Distribution.
39. “AMI” means Advanced Metering Infrastructure.
40. “GRIP” means Grid Resilience and Innovation Partnership

**THIRD SET OF INTERROGATORIES AND REQUESTS TO PRODUCE SERVED
UPON GREEN MOUNTAIN POWER CORPORATION**

Q.DPS.GMP.3-1. Please refer to page 6 of Mr. Burke’s rebuttal testimony, which states, “With internal and external crews pre-positioned, we were able to restore over 65,000 customers within the first 24 hours of the storm damage starting.”

- a. Will the proposed ZOI investments reduce or eliminate the cost of pre-positioning external crews?
- b. If subpart (a) is answered in the affirmative, what are the anticipated reduced costs of contracting for this service? Please provide the quantitative analysis.

Q.DPS.GMP.3-2. Please refer to pages 6-7 of Mr. Burke’s rebuttal testimony, which states, “GMP’s rapid storm response for customers is only possible with advanced planning and teamwork, but at a significant cost that recurs each time an impactful storm hits. Since the start of this fiscal year, restoring our customers in response to these events has cost \$16M in non-major storm spending, double our total yearly budget which is based on a multi-year historical average with 5 months to go. Meanwhile, the Major Storms in January and April cost an estimated \$20M combined. The increased frequency of storms drives up costs to customers to simply repair the system, creating added cost pressure that many cannot afford. On a one-year recovery basis, the \$20M in Major Storm costs so far this year, on their own, would have a significantly higher rate impact to customers than the ZOI Phase 1 we are proposing. This is why lasting solutions through our ZOI are needed for customers.”

- a. Does GMP anticipate a reduction in these recurring costs with the proposed Phase 1 of the ZOI investment?
- b. If subpart (a) is answered in the affirmative, to what degree will these costs be reduced? Please provide all supporting documentation.

Q.DPS.GMP.3-3. Please refer to page 8 of Mr. Burke’s rebuttal testimony, which states, “Our ZOI approach is informed by these numbers and other data, including our 4,900 reports, and Phase 1 is designed to address this disparity. As discussed further below, we are targeting work in these areas in the first phase of ZOI guided by the prioritization and criteria outlined in our climate plan, so that ZOI work helps those who need it most first. This equity driven approach ensures we are deploying measures that will keep customers safe in their homes, no matter where they live, while driving down costs for all customers in the long run.”

Please provide GMP’s analysis demonstrating, quantitatively, that Phase 1 of the ZOI will “drive down costs for all customers in the long run.”

Q.DPS.GMP.3-4. Please refer to page 10 of Mr. Burke’s rebuttal testimony, which states, “For example, National Grid in upstate New York announced a \$4 billion initiative to upgrade and rebuild more than 1,000 miles of their transmission system and Avangrid is in the midst of a multi-billion dollar hardening program in New York and is also pursuing upgrades in Maine. Con Edison in New York is also pursuing resilience improvements estimated to be approximately \$1 billion due to increased storm damage.”

- a. Have these investments been approved by regulators, and if yes, what, if any, requirements around planning, metrics, and cost-recovery have been imposed?
- b. Are any of these utilities promising zero outages as a result of these investments?

Q.DPS.GMP.3-5. One of the recommendations in Mr. Jordan’s direct testimony, at page 18, was for GMP to “provide a histogram for each of calendar years 2020, 2021, 2022, and 2023 indicating number of individual customers on the vertical axis and bins with total outage duration experienced on the horizontal axis.” Regarding GMP’s Exhibit GMP-MB-15b:

- a. Please explain why GMP provided SAIDI per the number of outages experienced, rather than the total outage duration for each individual customer.
- b. Please explain how to interpret the exhibit as currently provided.
- c. Please provide a revised exhibit for 2023 indicating the number of individual customers on the vertical axis and bins with total outage duration experienced on the horizontal axis.

Q.DPS.GMP.3-6. Please refer to page 12 of Mr. Burke’s rebuttal testimony, which states, “The ZOI is designed to be an extension and acceleration of GMP’s Climate Plan. The Department witnesses discuss at length shortcomings they perceive regarding the ZOI, but barely mention the defined and already Commission reviewed and approved screening criteria that GMP has incorporated for the ZOI from the Climate Plan, which was in turn incorporated into our current Integrated Resources Plan (IRP).”

The Commission’s 9/24/20 Final Order approving GMP’s Climate Plan stated, “The Commission also recognizes that the planning process and criteria for the evaluation of climate resiliency projects is likely to evolve as GMP gains experience in implementing the Plan approved in this case. If GMP files a future multi-year regulation plan, capital spending outlined in that plan should incorporate climate and other resilience spending so that overall investment may be evaluated holistically in the context of rate impacts and tradeoffs between different goals and outcomes.”

- a. Please describe the extent to which GMP has reviewed the criteria for the evaluation of resiliency projects to assess whether they are still appropriate.
- b. Has GMP considered whether changes to state policy, such as the passage of Act 154 of 2022, that warrants updates to screening criteria to ensure equitable prioritization of resilience efforts?

- c. Does GMP consider this ZOI to have been evaluated holistically in the context of rate impacts and tradeoffs associated with the broader MYRP? Please discuss.

Q.DPS.GMP.3-7. Please refer to page 15 of Mr. Burke’s rebuttal testimony, which states, “These two circuits are the right ones to prioritize for completion of the ZOI approach under the criteria adopted in the Climate Plan.”

- a. Has GMP reached this conclusion based on comprehensive screening of all 20 least-reliable circuits through the Climate Plan criteria?
b. If yes, please provide that analysis. If not, please explain why not.

Q.DPS.GMP.3-8. Please refer to page 16 of Mr. Burke’s rebuttal testimony, which provides “**Total Annual Outage Hours:** EJ-G7 – 270,001 hours; 56G1 – 73,044 hours.” GMP’s Climate Plan also includes in this criterion, “expected benefit from hardening.” Please provide, quantitatively, the expected benefit from hardening these lines.

Q.DPS.GMP.3-9. Please refer to page 17 of Mr. Burke’s rebuttal testimony, which states, “The estimated cost for ZOI implementation on those two circuits alone is approximately \$60M in undergrounding and spacer cable projects, plus approximately \$20M in customer storage. On **Exhibit GMP-MB-12**, I have laid out current estimated costs for the EJ-G7 circuit by segment. **Exhibit GMP-MB-13** provides the same information for the 56G1 circuit in central Vermont.”

- a. Please clarify which GMP district (e.g., in Exhibits GMP-MB-15a and GMP-MB-15b) these two circuits are in.
b. How many months would it take to complete work on each of these circuits?
c. What were the costs to maintain and respond to storms on these two circuits over the last 10 years?
d. What are the SAIFI and CAIDI for these two circuits?
e. What proportion of outages on these two circuits historically originated on areas of the system GMP would (i) storm harden, (ii) underground, (iii) provide storage?
f. Will the estimated funds for customer storage serve every Zone 4 customer in these two circuits? If not, how will GMP prioritize customers?
g. Has GMP incorporated any “right-sizing” or other features to support achievement of state emissions and energy requirements into the design of the proposed upgrades? If yes, please provide estimates for any increased costs related to accommodating both increased electrification and, separately, increased distributed generation.
h. Has GMP identified specific additional circuits beyond the EJ-G7 and the 56G1 that would consume the remainder of the requested funding? If so, which circuits?
i. Would any work on the EJ-G7 and 56G1 circuits occur under the current MYRP’s capital expenditure monetary cap approved in Case No. 21-3707-PET?

- j. Given the costs provided for the initial two circuits of Phase 1 of the ZOI, what is GMP's current estimate of the total cost to complete Phases 1 and 2 of the ZOI by 2030?

Q.DPS.GMP.3-10. Please refer to page 19 of Mr. Burke's rebuttal testimony: footnote 6 appears to have been inadvertently omitted. Please provide the intended footnote, if any.

Q.DPS.GMP.3-11. Please refer to page 35 of Mr. Burke's rebuttal testimony and Exhibit GMP-MB-17, GMP disagrees with removing Major Storms from systemwide SAIFI and CAIDI reporting and suggests instead supplemental reporting to yearly 4.900 reporting and/or regulation plan reporting, "with additional information related to the difference in reliability metrics by circuit and the speed of customer restoration when outages occur."

- a. The suggested supplemental metrics include SAIFI/CAIDI by circuit and SAIFI/CAIDI for storage customers by circuit, on circuits where ZOI investments have been made. Given that the goal of ZOI is to eliminate all outages by 2030, including ostensibly outages from Major Storms, why should Major Storms not be included in these circuit-specific metrics?
- b. The overall ZOI metrics include "EAP customers participating in ZOI storage" and "Critical Medical Customers participating in ZOI storage." Can these metrics be included in the ZOI-by-circuit report?
- c. Does GMP have suggestions for any environmental justice/equity metrics, such as percentage of ZOI investments supporting the focus populations (ex. low income, customers with critical medical needs, etc.)?
- d. Please describe GMP's plans to engage with customers during Phase 1 of the ZOI to evaluate the success of the project, including how it will engage both communities and customers receiving and those not receiving ZOI investments.
- e. Please discuss how GMP will assess whether they are engaging with the customers most impacted by resilience and reliability events and whether ZOI investments are meeting their needs.
- f. Please discuss whether information from those engagement efforts could be tracked in the ZOI metrics.

Q.DPS.GMP.3-12. Please refer to page 42 of Mr. Burke's rebuttal testimony, which states, "All of this will also lead to electric service at a cost that not only is just and reasonable compared to the repeated, increasing costs of storm repair and maintenance, but also more equitable for customers, as costs will go down over time and all GMP customers will be more safe and more secure in their homes." Please provide the underlying quantitative analysis that supports this assertion, including the expected O&M and storm repair and maintenance costs but for this proposed ZOI investment.

Q.DPS.GMP.3-13. Please refer to page 7 of Ms. Smith’s rebuttal testimony, which states, “We have tens of thousands of conversations with our customers each year. In 2023, GMP customer service representatives had more than 163,000 phone conversations with customers.”

- a. What percentage of these calls were from customers struggling to pay their electric bills?
- b. Please provide demographic information that GMP collected regarding these calls, the subject discussed, and describe whether they are representative of GMP’s customer base as a whole.

Q.DPS.GMP.3-14. Please refer to page 13 of Ms. Smith’s rebuttal testimony that states, “The feedback at every one of these meetings was overwhelmingly positive, recognizing the ferocity of the storms that have hit Vermont and caused damage in communities statewide. The most common questions we received were how quickly and when will more work start, the specific plan for each town, and how can towns collaborate with GMP on these efforts. Time was of the essence and what they wanted to know was ‘when can this happen?’ At no point in our outreach and information gathering process did community members question whether this work is needed.” Please describe the following about the regional engagement events discussed on pages 11-13 of Ms. Smith’s testimony:

- a. GMP’s approach to engaging with customers around the ZOI at each of the events. For example, did GMP ask participants at each event a specific set of questions? If so, did any of those questions focus on resilience or reliability?
- b. How the feedback from each event was recorded and tracked.
- c. How did GMP incorporate the feedback from the events into the ZOI proposal.
- d. How GMP conducted outreach for the events and how GMP assessed the extent to which these events reached customers most impacted by recent storm events.
- e. The extent to which GMP discussed costs and/or expected rate impacts associated with the ZOI initiative.
- f. The extent to which GMP discussed and requested feedback on how ZOI initiatives would be prioritized.

Q.DPS.GMP.3-15. Please refer to page 5 of Ms. Doane’s rebuttal testimony, which states, “Instead, tracking and reporting on performance of ZOI projects should be required as GMP proposes, but additional information is needed to ensure that any performance-based mechanisms that may be used in the future are properly designed and are clearly tied to the positive customer outcomes we all seek to achieve.”

Please provide examples of performance-based mechanisms that are “clearly tied to positive customer outcomes,” as well as the “additional information” that is needed.

Q.DPS.GMP.3-16. Please refer to page 4 of Mr. Castonguay rebuttal testimony that notes ZOI will “be more cost-effective than the status-quo.”

Please provide a detailed cost-effectiveness analysis, including all assumptions of the status quo, to support this statement, in native format. If not provided, please admit that there is no quantitative analysis to support this statement.

Q.DPS.GMP.3-17. Please refer to page 6 of Mr. Castonguay’s rebuttal testimony, which states, “During this time, the ESS tariff will continue for customers who are not located in the rural areas subject to our Phase 1 ZOI. In the future, based on the results of Phase 1 and incorporating new technological advances in energy storage and electric transportation, we anticipate a comprehensive statewide energy storage solution for all GMP customers.” In the ESS tariff, beneficiaries elect to pay for extra resilience. In the proposed Phase 1 of the ZOI, extra resilience is paid for by non-beneficiaries. What is the justification for this cross-subsidy?

Q.DPS.GMP.3-18. Please refer to page 6 of Mr. Castonguay’s rebuttal testimony, which states, “We are also working on a Grid Resilience and Innovation Partnership (“GRIP”) grant proposal, after initial positive feedback from the DOE. The GRIP project is designed to implement several complete Zero Outage circuits for customers specifically in Justice 40 communities, separate but complementary to the ZOI Petition. Application success is not guaranteed, but we continue to pursue any options to help customers.”

- a. Will GMP prioritize serving these communities through the ZOI if this proposal is not successful?
- b. Does GMP expect that either federal funding, or matching funding (or both) will be considered capital expenditures under the current MYRP as a status quo capital expenditure, or does GMP expect these costs to be part of the ZOI?

Q.DPS.GMP.3-19. Please refer to pages 7-8 of Mr. Castonguay’s rebuttal testimony, which state, “These criteria consider a range of factors, including but not limited to data in our 4.900 reports on our 20 least reliable circuits; the type, age, condition, and location of assets; the number of customers served by each circuit; outage hours and expected benefits of the ZOI approach; and the critical facilities served by the circuit. As with the T&D investments described by Mr. Burke, our customer storage deployments in Zone 4 under ZOI will be similarly informed by these criteria. In Phase 1, this means focusing a significant portion of our work on several of our least reliable circuits—starting with the two circuits that we are focusing on delivering a complete ZOI rollout during this first phase: the EJ-G7 circuit in the East Jamacia area and the 56G1 circuit in the Wilmington/Halifax/Whitingham area. Our remaining storage deployment will focus on other Zone 4 customers in areas that are among our least reliable circuits.”

- a. Please clarify whether in the EJ-G7 and 56G1 circuit ZOI work, all customers located in Zone 4 would receive free battery storage systems, or whether GMP will provide free batteries for customers based on customer-level review of the

selection criteria, i.e., reliability, infrastructure condition, presence critical medical equipment, etc.

- b. If all customers in Zone 4 were to receive free battery storage systems, would customers be prioritized for installations based on criteria such as those listed in the previous question?
- c. For the remaining storage deployments outside the identified circuits, how will customers receiving free battery storage systems be selected and prioritized?

Q.DPS.GMP.3-20. Please reference Exhibit GMP-MB-15a. Are these data for all outages or just storm outages?

Q.DPS.GMP.3-21. Please refer to page 10 of Mr. Castonguay rebuttal testimony that provides a customer email screenshot. Please provide the entire email chain associated with this screenshot.

Q.DPS.GMP.3-22. Please refer to page 14 of Mr. Burke's rebuttal testimony that discusses some 1,400 customers targeted for storage solutions. For just the 1,400 customers targeted for storage solutions, what has been their average outage duration?

Q.DPS.GMP.3-23. Please refer to page 8 of Mr. Burke's rebuttal testimony that provides a table reflecting outage data. Is this data specific to storm outages or is the data provided for all outages?

Q.DPS.GMP.3-24. Please refer to page 8 of Mr. Burke's rebuttal testimony that provides a table reflecting outage data. Please provide tables for each year of the 5 years following the ZOI implementation projecting the impact of the ZOI.

Q.DPS.GMP.3-25. Please provide evidence of the storm hardening section of lines that were not negatively impacted by the storms that was referenced by Exhibit GMP-MB-10.

- a. Please provide the number of poles replaced.
- b. Please provide the hours that the storm hardening line section was out of power.

Q.DPS.GMP.3-26. Mr. Burke states that ZOI Phase 1 will have less of a rate impact than the one-year recovery of the \$20M in Major Storm costs.

- a. Please provide the number of customers who will be impacted by the investment in ZOI Phase 1.
- b. For each storm listed in Exhibit GMP-MB-10, provide an estimate of the number of customers that would have been affected if ZOI Phase 1 was in place.

Q.DPS.GMP.3-27. Please refer to page 14, lines 17-19 of Mr. Burke's rebuttal testimony, Phase 1 is purported to include 1,400 additional customers who will receive storage directly in

their homes. What reduction in the \$20M storm restoration cost could have been expected if these homes had batteries?

Q.DPS.GMP.3-28. Please refer to Table 1 of Mr. Burke's rebuttal testimony:

- a. Please provide any comparison to other utilities.
- b. Please provide similar results for the prior 5 years.

Q.DPS.GMP.3-29.

- a. Please provide a list of other Vermont utilities implementing behind-the-meter storage programs.
- b. For each utility, please provide the customer contribution for behind-the-meter storage.

Q.DPS.GMP.3-30.

- a. Please refer to page 10, lines 14-16 of Mr. Burke's rebuttal testimony (), please provide a list of each customer that experienced zero outages for circuits that lost power during the storms listed in Exhibit GMP-MB-10.
- b. Please provide evidence of battery usage for each customer.

Q.DPS.GMP.3-31. Please refer to page 15, lines 15-18 of Mr. Burke's rebuttal testimony: Please explain how GMP proposes to demonstrate the effectiveness of ZOI. Specifically:

- a. What criteria will be used?
- b. How long must the system operate to demonstrate the effectiveness of the ZOI?
- c. How will cost be factored into the criteria?
- d. When will this analysis be accomplished?

Q.DPS.GMP.3-32. The costs of undergrounding in Exhibits GMP-MB-12 and MB-13 calculate to \$332,056 per mile and \$428,000 per mile, respectively. Please explain why these costs are higher than the value of \$179,180 per mile shown in Exhibit GMP-MB-14 for undergrounding costs.

Q.DPS.GMP.3-33. Please refer to Exhibit GMP-MB-12:

- a. Confirm the unit cost for storage is \$22,000 per customer in Zone 4 (455 customers with a total budget of \$10,010,000).
- b. Confirm that the total cost for ZOI projects will average \$17,349 per customer for the 2,648 customers on Circuit EJG7.

Q.DPS.GMP.3-34. Please refer to Exhibit GMP-MB-13:

- a. Confirm the unit cost for storage is \$22,000 per customer in Zone 4 (489 customers with a total budget of \$10,758,000).
- b. Confirm that the total cost for ZOI projects will average \$13,941 per customer for the 2,439 customers on Circuit 56G1.

Q.DPS.GMP.3-35. Has GMP estimated the cost for ZOI applied to all rural circuits? If so, provide the details of the cost estimate.

Q.DPS.GMP.3-36.

- a. Please explain why GMP did not propose a methodology or criteria for determining outage data for a customer with behind-the-meter storage.
- b. Should these customers be included in the SAIFI/SAIDI calculations?

Q.DPS.GMP.3-37. Please refer to page 12, lines 10-12 of Mr. Castonguay's rebuttal testimony:

- a. Please provide data that demonstrates a seamless transition to the battery include actual recording information.
- b. Please provide data demonstrating that the batteries provide whole house back (including all appliances) during all outages.

Q.DPS.GMP.3-38. Please refer to page 13, lines 7-10 of Mr. Castonguay's rebuttal testimony, please provide evidence that there is no limitation on peak energy consumption for homes with storage, specifically any electric heat requirements and electric dryers.

Q.DPS.GMP.3-39. Please refer to Mr. Mills and Mr. Buxton's rebuttal testimony and Exhibit GMP-DM-KB-1: For each photo of a tree down, what would be the impact if the tree in each photo fell on a line equipped with a space cable (broken poles, broken conductor, failed insulation, etc.)?

Q.DPS.GMP.3-40. Please refer to page 6 of Ms. Doane's rebuttal testimony, please identify any mechanism in place that would provide the savings realized through the ZOI program to be directly attributed to customers other than the MYRP Major Storm Adjustor.

Q.DPS.GMP.3-41. Please refer to page 6, line 19 and page 7, line 9 of Ms. Doane's rebuttal testimony: Please confirm that GMP will annually highlight savings realized through the ZOI program to adjust the rate in each multi-year cycle.

Q.DPS.GMP.3-42. Please refer to page 7, lines 10-16 of Ms. Doane's rebuttal testimony: Please explain why any savings generated by the ZOI projects will not be treated as an offset to the ZOI regulatory asset accounts.

Q.DPS.GMP.3-43. Please refer to pages 12-14 of Mr. Castonguay’s rebuttal testimony: Is GMP aware of any Zone 4 customers on the Phase 1 ZOI circuits with a load larger than the two Tesla Powerwall 2 batteries can accommodate?

- a. If so, how many?
- b. If so, what is GMP’s proposed Phase 1 solution for these customers?

Q.DPS.GMP.3-44. Please refer to page 31 of Mr. Burke’s rebuttal testimony, which states: “If the storage customer ultimately does consume their full amount of storage and suffers an outage at that point, we would count that outage period following depletion of the battery as part of our reliability statistics.” Is GMP’s outage management system currently able to coordinate the meter data and the storage data to accurately track outages as described in the above-quoted testimony?

Dated at Montpelier, Vermont this 19th day of April 2024.

/s/ Erin C. Brennan
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