

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

May 13, 2024

Summary: My testimony discusses Green Mountain Power Corporations's ("GMP" or "Utility") Service Quality Reliability Plan ("SQRP"). I continue to recommend changes in SQRP metrics that would allow regulators to better evaluate, and provide for, equitable outcomes for GMP's ratepayers.

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

6 A2. Yes. I provided direct testimony discussing GMP’s Service Quality Reliability Plan  
7 (“SQRP”).

8 **Q3. What is the purpose of your surrebuttal testimony?**

9 A3. My testimony responds to rebuttal testimony of Tiana Smith about planned updates to  
10 GMP’s SQRP.

11 **Q4. Has GMP begun the task of updating its SQRP?**

12 A4. Yes. GMP has requested a meeting for mid-May with staff at the Department’s Consumer  
13 Affairs and Public Information Division and reports having a draft started.

14 **Q5. Do GMP’s efforts so far address your recommendation that GMP revise its SQRP  
15 within six months after a final order in this proceeding to address specific metrics  
16 necessitated by the ZOI investment?**

17 A5. No. I continue to recommend additional service quality performance measurement because  
18 of the significant and unprecedented changes to the customer experience, for example,  
19 something approaching zero outages, that this proceeding represents. Therefore, I  
20 respectfully recommend that the final order for this proceeding require a revised SQRP  
21 from GMP with a required deadline that includes removing the major storm exclusion,  
22 which can be implemented when storm hardening has been accomplished.

1 **Q6. Do you have any further concerns about Ms. Smith's comments about service**  
2 **compensation calculations reporting timelines and process, service guarantees, and**  
3 **compensation values, and timing of updates?**

4 A6. No. I agree with Ms. Smith that we can discuss the particulars of these subjects further  
5 during updates planned to the SQRP outside of this proceeding.

6 **Q7. How do you respond to Ms. Smith's comments about addressing energy burden,**  
7 **equity, and community resilience via MYRP or ZOI reporting instead of SQRP**  
8 **reporting?**

9 A7. Please see my colleague, Ms. Claire McIlvennie's testimony for discussion and response.  
10 MYRP and ZOI are two cases making focused investments resulting in increased costs for  
11 consumers and certainly worth specific reporting. However, as Ms. Smith points out in her  
12 testimony, service quality measurement is an attempt to understand the customer  
13 experience overall. Certainly, energy cost burden, equity, and community resilience are  
14 worthy metrics for inclusion for understanding the full picture of the customer experience.

15 **Q8. Do you still recommend that metrics be established for energy burden, equity, and**  
16 **community resilience with the SQRP?**

17 A8. Yes. Metrics should be established and reported on for energy burden, equity, and  
18 community resilience within the SQRP. These metrics should be exempt from service  
19 guarantees and not be included in service quality compensation point calculations.

20 **Q9. Do you persist with your remaining recommendations?**

21 A9. Yes. As mentioned previously in this document and in my prefiled direct testimony, revised  
22 SAIFI and CAIDI metrics should be established (as discussed in the testimony of Mr.

1 Jordan). System Average Interruption Frequency Index (SAIFI) measures the average  
2 number of interruptions that a customer experiences. The Customer Average Interruption  
3 Duration Index (CAIDI) measures the average outage duration experienced by a customer.  
4 Annual reporting of SAIFI and CAIDI metrics should no longer exclude major storms.  
5 Moreover, service quality compensation points calculations would also no longer exclude  
6 major storms. In addition to the changes described for the SQRP, the Department also  
7 recommends annual reporting that describes how GMP has planned for and implemented  
8 equitable investments in rural and otherwise disadvantaged areas.

9 **Q10. Does that conclude your testimony?**

10 A10. Yes.