

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 22-0175-INV

Tariff filing of Green Mountain Power  
requesting a 2.34% increase in base rates  
effective on bills rendered on or after October  
1, 2022

Case No. 21-3707-PET

Petition of Green Mountain Power  
Corporation for approval of a Multi-Year  
Rate Plan (MYRP) pursuant to 30 V.S.A.  
Sections 209, 218, and 218d

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

April 20, 2022

Summary: Ms. Flint's testimony discusses consumer complaints, highlights public comments, provides a brief summary of Green Mountain Power's participation in Covid relief programs, and makes recommendations regarding rental hot water heaters and the utility's service quality plan.

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

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

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

5 A2. I hold a Bachelor of Arts degree with a focus in Sociology from Norwich University  
6 (Vermont College), Northfield, Vermont. I joined the Department as the CAPI Director  
7 in February of 2016. Currently, I manage the Administrative Services and Consumer  
8 Affairs and Public Information Divisions. Previously, I served as Executive Director for  
9 BROCC—Community Action in Southwestern Vermont, beginning in 2014. Prior to that, I  
10 worked at Capstone Community Action for over 20 years, most recently as its Program  
11 Director for Family and Community Support Services.

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

14 A3. Yes. I have provided testimony previously in Docket Nos. 8701, 8881, and Case Nos. 17-  
15 1238-INV, 17-3112-INV, 17-3232-PET, 18-0409-TF, 18-0726-INV, 18-0974-TF, 18-  
16 3231-PET, 20-0654-CC, and 21-4060-IRP.

17 **Q4. What is the purpose and focus of your testimony?**

18 A4. The purpose of my testimony is to present an overview of Green Mountain Power’s  
19 (“GMP”) recent service quality, customer service history, and reliability of service. My  
20 testimony provides information regarding comments and concerns raised by consumers  
21 via public comment or through complaints filed with CAPI. I also describe the utility’s

1 participation in Covid relief programs. My testimony also makes a recommendation  
2 regarding GMP's service quality plan.

3  
4 Statutorily, the Department is charged with representing the public interest pursuant to 30  
5 V.S.A Sec. 2. Based on the number of public comments, addressed below in further  
6 detail, it is clear the public is unhappy and frustrated regarding GMP's proposed rate  
7 increase. My testimony acknowledges this fact.

8 **Q5. What concerns have consumers expressed as public comments about this proceeding**  
9 **to the Commission or directly to the Department about the rate case and the**  
10 **potential for a rate increase?**

11 A5. Consumers have not expressed concerns or made comments to the Department directly  
12 about the rate case. However, a dozen customers have made public comments directly to  
13 the Commission. This is a relatively large number of public comments for any case  
14 before the Commission, most of which complain about the potential for a rate increase.  
15 The Department's primary focus is to keep rates as low as possible within the parameters  
16 governing utility rates. Attorneys, expert witnesses, and financial analysts at the  
17 Department are carefully reviewing GMP's filing to ensure that the math is scrutinized,  
18 and the case is thoroughly reviewed overall.

1 Public comments filed in ePUC include:

- 2 i. "The rate increase is unjustified."  
3 ii. "I feel that GMP should not be able to increase rates as individuals pay has  
4 not increased or kept up with inflation rates."  
5 iii. "I strongly object to any rate increase that Green Mountain Power is  
6 requesting for Oct 1, 2022 thru Sept 30, 2023."  
7 iv. "I am vehemently opposed to another increase."  
8 v. "If Green Mountain Power keeps increasing their rates, then the same rate  
9 increase should apply to paying their customers who have invested in solar  
10 power." "...another issue is that I just received today the notice of the  
11 hearing, there should be more of a notice given to customers than three  
12 days."  
13 vi. "Why in the world would any consumer-conscious Commission believe a  
14 public facing entity proclaiming that 'the average residential customer will  
15 see an increase of about \$2.63 on their monthly energy statement'? Unless  
16 that customer resides in a remote cabin with no children or pets, this is a  
17 blatant LIE at best."  
18 vii. "This is not warranted; their service and additional charges are added to  
19 our bills without authorization from consumers."  
20 viii. "I want the PUC Comms to explain why they are approving so many rate  
21 hikes for GMP."  
22 ix. "I am especially aggrieved by GMP taking my credit (no matter how little)  
23 for itself while I try to be environmentally conscious."  
24 x. "I am opposed to the rate increase."  
25 xi. "GMP does not run their business at a loss, but rather are very profitable,  
26 employees making good, and deserved dollars... This can be made  
27 possible by charging less, helping those who have earned less in life."  
28 xii. "I am against the proposed increase."

29 There were two public comments made during the public hearing on March 10, 2022.

30 Those comments included:

- 31 i. "Could you lower the rate increase a little to save us some more money?"  
32 ii. "Would you consider spreading out the rate increase over a longer period  
33 of time to help consumers lower the bills during these difficult economic  
34 times?"

1 Public comments clearly demonstrate that customers are concerned about a rate increase,  
2 any rate increase in the current economic environment. The Department is similarly  
3 concerned.

4 **Q6. What complaints have consumers made directly to the Department on other**  
5 **matters?**

6 A6. In the past year, 161 GMP customers have complained or inquired with the Department  
7 about a variety of matters. See Figure 1, GMP Complaints 4/13/2021 through 2022.  
8 Roughly 50% of these contacts were related to payment assistance of some type.

Complaint Type	Total
	1
Billing	13
Business practice	12
Change order	1
COVID Bill Assist	14
Delivery of service	1
Disconnection	8
Facilities	8
Fees	9
Line extension	2
Other	10
Payment Arrangement	14
Rate	3
Repair	2
Service Order	1
Service Outage	3
Smart Meter	1
VCAAP	58
Grand Total	161

Figure 1 - GMP Complaints 4/13/2021 to 2022

9 **Q7. What has GMP done to help its customers who were unable to pay their bills?**

10 A7. GMP has actively participated in four programs to assist customers with arrearages and  
11 current amounts due. The utility promoted both the Vermont COVID-19 Arrearage

1 Assistance Program (“VCAAP”) and its successor program, Vermont COVID-19  
2 Arrearage Assistance Program II (“VCAAP II”) to its customers. GMP also populated the  
3 program’s database with amounts due and worked closely with program administrators  
4 throughout the program to ensure access and accuracy. VCAAP provided GMP  
5 customers collectively with approximately \$6 million in Covid Relief Funds arrearage  
6 assistance in 2020. VCAAP II provided nearly \$13 million in Covid Relief Funds  
7 arrearage assistance for GMP customers in 2021. GMP continues to actively engage with  
8 the Vermont Emergency Rental Assistance Program (“VERAP-U”) and the Vermont  
9 Homeowner Assistance Fund (“VHAP”). VERAP-U to date has provided  
10 approximately \$5.8 million for renters in Vermont over the past year. VHAP is a program  
11 of the Vermont Housing Finance Agency. Data about that program can be found at  
12 <https://www.vhfa.org/partners/initiatives/program-impacts/HAP>.

13 **Q8. What is your opinion about GMP’s service quality?**

14 A8. GMP has met or exceeded its service quality metrics for 2021. Overall, customer  
15 complaints about GMP are a very modest number.

16 **Q9. Are there any concerns about GMP’s service quality plan?**

17 A9. GMP’s service quality plan is outdated and requires a review and updates. The  
18 Department has had one meeting with GMP to discuss the service quality plan. It is the  
19 Department’s understanding that it will work collaboratively with GMP to update the  
20 2014 plan.

21 **Q10. Does this conclude your testimony?**

22 A10. Yes.