

REBUTTAL TESTIMONY
OF
DONALD L. DUBOIS, JR.

CASES 09-E-0588 & 09-G-0589

1 Q. Are you the same Donald L. DuBois, Jr. who submitted pre-filed direct
2 testimony in this proceeding?

3 A. Yes, I am.
4

5 Q. What is the purpose of your rebuttal testimony in this proceeding?

6 A. The purpose of my rebuttal testimony is to respond to certain portions of the
7 prepared testimony of Accounting Panel and Electric Infrastructure Panel
8 regarding Central Hudson's forecasted stray voltage and distribution line
9 clearance expenditures.
10

11 **Stray Voltage**
12

13 Q. What methodology did the Accounting Panel propose to utilize to calculate
14 rate year expenditures for stray voltage testing?

15 A. The Accounting Panel proposed to utilize the average of the actual costs of
16 the last three testing cycles (2005-2006 cycle, 2007 cycle, and 2008 cycle)
17 as provided by Central Hudson in response to Staff Interrogatory DPS-33,
18 even though those historic expenditures do not take into consideration the
19 impacts associated with the changes to the stray voltage testing
20 requirements implemented by the Commission effective with the 2009 testing
21 cycle. To update the Panel's forecast by utilizing the actual expenditures for
22 the 2009 testing cycle (under the new Commission requirements) with some

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1 adjustments for expenditures that were not incurred in 2009 but are
2 anticipated to be incurred in 2010 and beyond (equipment replacement and
3 data management and reporting upgrades) will provide a more accurate
4 forecast than the average of the prior three testing cycles.

5

6 Q. How did the Accounting Panel propose to escalate the stray voltage rate year
7 expenditures?

8 A. The Accounting Panel proposed applying the GDP inflation rate to develop
9 the stray voltage expenditure forecast.

10

11 Q. Does this method accurately forecast the expenditures associated with stray
12 voltage testing?

13 A. No. In response to Staff Interrogatory DPS-142 Central Hudson provided
14 copies of the multi-year contracts for the stray voltage program that
15 contained the bid pricing for the various stray voltage activities. Even though
16 the Staff Accounting Panel did not identify any basis for not reflecting the
17 contract information, the methodology utilized by the Accounting Panel does
18 not take into consideration the bid pricing associated with the contracts
19 already in place that were the basis for the escalation factors utilized by the
20 Company in developing the forecast. Since it is apparent that the Company
21 will be incurring costs pursuant to the contracts, as outside labor is employed

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1 for these activities, applying the GDP inflation factor in lieu of the actual
2 escalation factors supported by the bid pricing will not provide sufficient
3 expenditures to complete the required stray voltage testing program. The
4 escalation factors provided in the contract documentation are summarized in
5 the table below:

	2008	2009	2010	2011
Testing – distribution, streetlights, and traffic signals	Escalation Factor 2.61%	Escalation Factor 2.61%	Escalation Factor 2.61%	Escalation Factor 2.61%
Testing – Transmission	Escalation Factor 3.8%	Escalation Factor 3.8%	Escalation Factor 3.8%	Escalation Factor 3.8%
Data Management	Escalation Factor 2.7%	Escalation Factor 2.7%	Escalation Factor 2.7%	Escalation Factor 2.7%
QA/QC	Escalation Factor 5.0%	Escalation Factor 5.0%	Escalation Factor (4.58%)	Escalation Factor 0.0%

6

7 Q. Please describe the competitive bid solicitation conducted by the Company
8 that led to the existing stray voltage testing contracts.

9 A. In the fall of 2006, the Company solicited bids from four qualified contractors
10 for the distribution stray voltage testing and facility inspection programs.
11 Pricing was requested to perform the stray voltage testing of the facilities that
12 would not be inspected, a bid for the stray voltage testing and inspection of
13 the facilities scheduled for inspection, and a combined bid to perform all of the
14 scheduled stray voltage testing and inspections. Multi-year pricing was

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1 requested to take advantage of any cost savings associated with applying the
2 experience gained to subsequent years.

3

4 Q. In addition to the contract escalation factors, did the Company include any
5 other provisions of the contracts in developing its forecast rate year stray
6 voltage expenditures?

7 A. Yes. We reflected the pricing advantages that were produced as a result of
8 the long-term specifications we defined in the bids.

9

10 Q. Can you quantify the savings associated with awarding a multi-year contract
11 for stray voltage testing and QA/QC?

12 A. The table below summarizes the anticipated savings for each activity by
13 comparing the pricing provided by the low bidder to the second lowest
14 bidder's pricing based on awarding a multi-year contract:

	2008	2009	2010	2011	4 - Year Total
Stray Voltage Testing and Distribution Inspections	\$229,130	\$240,178	\$251,665	\$263,610	\$984,583
QA/QC	\$13,869	\$14,564	\$11,536	\$11,536	\$51,505
Total Savings	\$242,999	\$254,742	\$263,201	\$275,146	\$1,036,088

15

16 Q. Did the Staff Accounting Panel make any adjustments to the advantageous

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1 prices reflected in the contracts?

2 A. No. The Staff Accounting Panel did not employ the contract pricies for the
3 work that will be employed in the rate year.

4

5 Q. Can you provide a summary of the stray voltage testing costs by activity for
6 2009?

7 A. Yes. The stray voltage testing costs for the first full cycle of testing in
8 compliance with the Order Adopting Changes to Electric Safety Standards in
9 Case 04-M-0159 and Case 06-M-1467 (issued and effective December 15,
10 2008) for 2009 are summarized in the Table below which reflects 11 months
11 of actual charges and an estimate of the charges for December:

Distribution OH & UG	Street Lights & Traffic Signals	Transmission	QA/QC	Total
\$1,461,587.74	\$31,916.89	\$179,865.22	\$35,572.08	\$1,708,941.93

12

13 Q. Can you apply the escalation factors for 2010 to the actual 2009
14 expenditures to forecast the stray voltage testing costs for the 2010 testing
15 cycle and then compare the results to the forecasted expenditures provided
16 in Exhibit (DLD 1)?

17 A. Yes. The forecast for the 2010 stray voltage testing cycle from Exhibit (DLD
18 1) as well as the forecast utilizing 2009 actual costs escalated based on the
19 bid pricing are summarized in the Table below:

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2010 Forecast	Distribution OH & UG	Street Lights & Traffic Signals	Transmission	QA/QC	Total
DLD 1 Forecast	\$1,827,410	\$32,559	\$137,929	\$48,510	\$2,046,408
Escalated 2009 Forecast	\$1,499,735	\$32,750	\$186,700	\$35,572	\$1,754,757
Difference	\$327,675	(\$191)	(\$48,771)	\$12,938	\$291,651

4

5 Q. Does escalation of the latest actual costs for 2009 to 2010 provide a sound
6 estimate for 2010 costs?

7 A. No, it does not, because there will be additional expenditures in 2010 that
8 were not incurred in 2009.

9

10 Q. Can you quantify the expenditures that were not incurred in 2009 but are
11 anticipated to be incurred in 2010 and beyond (equipment replacement and
12 data management and reporting upgrades) to provide a more accurate
13 forecast than just applying the escalation factor to the actual 2009
14 expenditures?

15 A. Yes. It is anticipated that expenditures of \$50,000 for equipment
16 replacements, \$40,000 for data management upgrades, and \$10,000

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1 associated with the QA/QC year end audit would need to be added to the
2 actual 2009 expenditures to accurately forecast the 2010 stray voltage
3 testing program expenditures. Including these items in the forecast for 2010
4 would result in a savings of \$191,651 compared to the Exhibit (DLD 1)
5 forecast for this period. Similar savings (about \$191,000) would be
6 anticipated for rate year ending June 30, 2011 as compared to my estimate
7 in Exhibit (DLD 1) that was prepared in mid-year before the eleven months of
8 actual information for 2009 was available.

9

10 Q. Can you summarize the number of findings above 1 volt for each of the four
11 complete testing cycles that have been completed?

12 A. Yes. The stray voltage findings for each testing cycle are summarized in the
13 table below:

Stray Voltage	2005/2006	2007	2008	2009	Annual Average
Findings	529	987	533	422	618

14

15 Q. Can you revise your forecast for standby and mitigation costs for 2010 based
16 on the annual average number of findings?

17 A. Yes. Utilizing a period of two hours for one person to standby each finding
18 and four hours for a two man line crew to mitigate each finding, the
19 forecasted expenditures for standby and mitigation for 2010 would be

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1 \$43,260 and \$494,400 respectively. Utilizing the actual costs incurred during
2 2009 and extrapolating to forecast the expenditures associated with 618
3 findings would be \$10,036 for standby and \$266,970 for mitigation. In
4 summary, the anticipated expenditures associated with standby for 2010
5 could range from as low as \$10,036 to as high as \$43,260. Likewise the
6 range of expenditures for mitigation could be as low as \$266,970 or as high
7 as \$494,400. Obviously, these costs would be increased if the actual
8 number of findings were to exceed the average, and it should be noted that
9 the range of actual results actually experienced exceeded the average by
10 about 50%.

11

12 Q. Is there a potential to reduce the forecasted expenditures associated with the
13 stray voltage program?

14 A. Yes. As indicated above, the greatest uncertainty related to the changes to
15 the requirements associated with stray voltage testing in the Order Adopting
16 Changes to Electric Safety Standards in Case 04-M-0159 and Case 06-M-
17 1467 (issued and effective December 15, 2008) is associated with the
18 change in the definition of “finding” and “mitigation” requirements. The cost
19 to perform the required stray voltage testing has been reasonably well
20 established over the last several years and the multi-year contracts currently
21 in place provide both cost-reduction benefits and the associated escalation in

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1 cost for future years. The changes to the definition of “finding” to be, in
2 effect, any confirmed voltage reading on an electric facility greater than or
3 equal to 1 volt measured using a volt meter and a 500 ohm shunt resistor in
4 2009 rather than greater than or equal to 8 volts will increase the number of
5 locations requiring standby and mitigation. The changes to the definition of
6 “mitigation” now require necessary actions performed by the utility to
7 effectively eliminate the stray voltage findings. This new requirement
8 coupled with the change in the definition of “finding” (i.e., continue to make
9 safe, repair and test until less than 1 volt is observed) has significantly
10 increased the number of locations that have required mitigation as well as
11 the extent of the mitigation. Although there was a 20% reduction in the
12 number of findings in 2009 compared to 2008, it should also be recognized
13 that there was an 87% increase in findings in 2007 compared to the
14 2005/2006 testing cycle. The number of findings varies due to the fact that
15 the majority of the findings are naturally occurring rather than a system
16 defect and are therefore difficult to quantify or forecast from one year to the
17 next.

18

19 Q. Have you quantified the incremental costs for standby and mitigation
20 associated with the Order Adopting Changes to Electric Safety Standards?

21 A. Yes, the stray voltage forecast includes expenditure estimates for the

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1 standby and mitigation activities; however, unlike the forecast for stray
2 voltage testing where the scope of work is well established and defined, the
3 contractor standby and mitigation costs are directly proportional to the
4 number of findings which has not been consistent from year to year due to
5 the required testing of municipal streetlights and traffic signals. It is difficult
6 to predict the condition and number of findings from one year to the next for
7 these facilities since they are not inspected and maintained by Central
8 Hudson. Providing recovery in rates for the well defined stray voltage testing
9 program and deferral accounting for standby and mitigation costs will insure
10 that the funding for the stray voltage program will be properly aligned with the
11 actual costs.

12

13 **Distribution Line Clearance**

14

15 Q. How would you summarize the factors that have resulted in the significant
16 increase in the distribution line clearance forecasted expenditures?

17 A. The two factors that have resulted in the significant increase in the
18 distribution line clearance forecasted expenditures are the increase in miles
19 to be completed and the increase in the cost per mile to complete the
20 required trimming compared to prior years.

21

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1 Q. Can you explain the reason and quantify the projected increase in miles?

2 A. There are 5,452 total system on-road miles which equates to 1,363 miles per
3 year to complete all of the on-road miles in four years. There are a total of
4 1,703 total system off-road miles which equates to 426 miles per year to
5 complete all of the off-road miles in four years. All of the funding provided
6 through rates for distribution line clearance has been allocated to completing
7 the program and all of the funds provided in rates for the three year
8 settlement ending June 30, 2009 were fully expended. In most cases the
9 requested funding was not sufficient to complete all of the miles required to
10 stay on the proposed four year cycle. A summary of the on – road miles
11 completed is provided in the table below:

On-Road Miles	Planned	Completed	Deficit
3/1/07 – 12/31/07	1135.8 (10/12 of 1,363)	1020.6 (Actual)	115.2
1/1/08 – 12/31/08	1,363	1227.3 (Actual)	135.7
1/1/09 – 12/31/09	1,363	913.6 (11 month actual + 1 month projected)	449.4
1/1/10 – 6/30/10	681.5 (6/12 of 1,363)	458.7 (Projected)	222.8
Subtotal	4,543.3	3,620.2	923.1

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2

To complete the first trimming cycle in four years (by 2/28/11) would require

3

trimming 1,831.8 miles in 8 months which includes planned miles of 908.7

4

(8/12 of 1,363) plus the deficit of 923.1 miles. My pre-filed direct testimony

5

and associated forecasted expenditures were based on completing the entire

6

system by 6/30/11 which would have resulted in a 4 year - 4 month cycle.

7

8

Similarly, a summary of the off-road miles completed is provided in the table

9

below:

10

Off-Road Miles	Planned	Completed	Deficit
3/1/07 – 12/31/07	355 (10/12 of 426)	289.1 (Actual)	65.9
1/1/08 – 12/31/08	426	434.5 (Actual)	-8.5
1/1/09 – 12/31/09	426	384.7 (11 month actual + 1 month projection)	41.3
1/1/10 – 6/30/10	213 (6/12 of 426)	93.3 (Projected)	119.7
Subtotal	1,420	1,201.6	218.4

11

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1 To complete the first trimming cycle in four years (by 2/28/11) would require
2 trimming 501.4 miles in 8 months which includes planned miles of 283 (8/12
3 of 426) plus the deficit of 218.4 miles. As indicated above, my pre-filed direct
4 testimony and the associated forecasted expenditures were based on
5 completing the entire system by 6/30/11.

6

7 Q. Why didn't prior rate case forecasted expenditures provide sufficient funding
8 to complete the required modified enhanced miles associated with the
9 proposed four year trimming cycle?

10 A. The forecasted expenditures for the twelve month periods ending 6/30/2007,
11 6/30/2008, and 6/30/2009 were based on performing standard "box" trimming
12 on a three year cycle. During the fall of 2006, an independent consultant
13 was retained to analyze Central Hudson's distribution line clearance
14 practices from an electric reliability perspective. Based on a review of
15 Central Hudson's tree related outage data it was determined that most of the
16 outages were being caused by tree or limb failure not growth contact. The
17 consultant recommended that Central Hudson establish greater clearances
18 by reducing the overhang and removal of tall growing species from within the
19 ROW (modified enhanced trimming). To quantify the additional time required
20 to provide increased side clearances, reduce the overhang and remove the
21 tall growing species from within the ROW compared to standard box

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1 trimming, in the fall of 2006, Central Hudson had a contractor line clearance
2 crew complete the standard box trimming for a one mile segment and then
3 the same crew completed modified enhanced trimming for a one mile
4 segment in the same area and it was determined that the modified enhanced
5 program took twenty-five percent longer to complete than standard box
6 trimming. Since the funding had already been established in rates for the
7 three year period ending June 30, 2009, Central Hudson proposed extending
8 the trimming cycle from 3 years to 4 years to offset the increased costs
9 associated with performing the additional work associated with the modified
10 enhanced program. The consultant's recommendations as well as the
11 proposed extension of the trimming cycle were reviewed with DPS Staff as a
12 focus topic at the Quarterly Reliability Meeting in early 2007. Central Hudson
13 transitioned to the modified enhanced trimming methodology in March of
14 2007 and extended the trimming cycle to four years to mitigate the cost
15 impact of the new program on customers' rates. In mid-2008, when I
16 prepared the forecast for trimming in the prior rate case, the forecasted cost
17 of the program for the rate period ending June 30, 2010 was based on the
18 anticipated cost to complete 25% of the on-road and 25% of the off-road total
19 system miles during the twelve-month period. The actual average cost per
20 mile during the twelve-month period ending March 31, 2008 escalated by the
21 anticipated hourly cost increase was utilized to forecast the required

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1 expenditures for the rate year ending June 30, 2010. Since slightly more
2 than one year of the program had been completed when the direct testimony
3 and forecast were prepared for the rate year ending June 30, 2010, the
4 projected miles to be completed were not adjusted.

5

6 Q. Why did you utilize a different methodology in mid-2009 to forecast the
7 required expenditures for the rate year ending June 30, 2011?

8 A. When the forecast for the distribution line clearance expenditures for rate
9 year ending June 30, 2011 was being prepared it became necessary to
10 project the number of miles that needed to be trimmed to facilitate completing
11 the first modified enhanced trimming cycle in slightly more than four years
12 (by June 30, 2011). A review of the miles already completed and projected
13 miles to be completed based on the allocated rate allowance for distribution
14 trimming through June 30, 2010, revealed a need to complete more than
15 25% of the total system miles during this twelve month period which as
16 indicated above is a significant factor in the requested increase in funding.

17

18 Q. Can you explain and quantify the projected increase in the cost per mile?

19 A. As indicated previously, in the fall of 2006, Central Hudson completed the
20 standard box trimming for a one mile segment and then completed modified
21 enhanced trimming in the same area and determined that the modified

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1 enhanced program would take twenty-five percent longer to complete than
2 standard box trimming. This field test was intended to be representative of
3 the increased time required to provide increased side clearances, reduce the
4 overhang and remove the tall growing species from within the ROW. We
5 subsequently learned; however, that the results of this test were not
6 necessarily representative of the conditions that we have encountered more
7 recently in the field. It appears that the growing conditions over the last
8 several years have not been typical for our area and the tree density and re-
9 growth in some areas has been significantly more than anticipated. Central
10 Hudson has requested a proposal from the consultant that analyzed our
11 distribution line clearance program in 2006 to perform a follow-up survey to
12 quantify the increase in tree density and re-growth to assist in the forecasting
13 of crew productivity and associated cost following the completion of the first
14 modified enhanced trimming cycle. Since there appeared to be a significant
15 increase in tree density, in developing the rate year forecast in the present
16 case, the actual average cost/mile for the first four months of 2009 was
17 utilized to forecast the required expenditures to complete the remainder of
18 the modified enhanced trimming. Central Hudson began tracking the cost
19 per mile by circuit in the spring of 2009, and this information is helpful to
20 explain the variations being experienced in the field. A summary of the
21 results by district for on-road modified enhanced line clearance is provided in

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1 the table below:

On-Road District	Miles Completed	Total Cost	Average Cost/mile	Highest Cost/mile	Lowest Cost/mile
Catskill	9.5	\$20,859.92	\$2,195.78	\$2,195.78	\$2,195.78
Kingston	244.94	\$1,083,961.52	\$4,425.49	\$4,808.46	\$3,856.16
Poughkeepsie	96.39	\$567,955.87	\$5,892.27	\$10,133.69	\$1,378.73
Fishkill	84.58	\$464,859.88	\$5,496.36	\$6,481.64	\$4,287.91
Newburgh	151.48	\$707,992.27	\$4,673.83	\$7,310.78	\$1,378.73
System Totals	577.38	\$2,824,769.54	\$4,892.38	\$10,133.69	\$1,378.73

2

3 Q. How do the results summarized in the table above compare with the average
4 cost per mile utilized to develop the forecast?

5 A. The average cost per mile on a system basis utilized to develop the forecast
6 was \$4,445 which is \$447.38/mile less than the actual average cost per mile
7 experienced in 2009.

8

9 Q. Did you perform a similar analysis for the off-road line clearance program?

10 A. Yes. A summary of the results by district for off-road modified enhanced line
11 clearance is provided in the table below:

Off-Road	Miles	Total Cost	Average	Highest	Lowest

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District	Completed		Cost/mile	Cost/mile	Cost/mile
Catskill	15.5	\$121,229.22	\$7,821.24	\$7,821.24	\$7,821.24
Kingston	114.98	\$716,015.85	\$6,227.31	\$17,252.73	\$5,028.28
Poughkeepsie	50.17	\$279,973.47	\$5,580.50	\$9,061.14	\$5,028.28
Fishkill	22.57	\$113,488.28	\$5,028.28	\$5,028.28	\$5,028.28
Newburgh	71.28	\$461,723.14	\$6,477.60	\$22,934.77	\$5,028.28
System Total	259	\$1,571,200.74	\$6,066.41	\$22,934.77	\$5,028.28

1

2 Q. How do the results summarized in the table above compare with the average
3 cost per mile utilized to develop the forecast?

4 A. The average cost per mile on a system basis utilized to develop the forecast
5 was \$8,307 which is \$2,240.59/mile more than the actual average cost per
6 mile experienced in 2009. During 2009, Central Hudson successfully
7 obtained lump sum pricing (\$5,028.28/mile) to perform a significant portion of
8 the off-road modified enhanced line clearance. Meetings with the contractor,
9 who was awarded this lump sum work, to discuss extending the lump sum
10 pricing into 2010 proved unsuccessful since the contractor indicated that they
11 had significantly underestimated the tree densities in most areas and as such
12 had performed the work at a significant loss for the year. Pricing for 2010 will
13 therefore revert back to the hourly rate pricing which was utilized in
14 developing the forecasted cost of \$8,423/mile for 2010.

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2 Q. Do you plan to evaluate the densities of the remaining circuits to be trimmed
3 or compare the future conditions to the densities of the circuits trimmed
4 during 2009?

5 A. Central Hudson plans to conduct an assessment of the density of the
6 remaining circuits as part of the work planning process. However, the
7 densities have been increasing each year since 2007 with the most dramatic
8 increase experienced in 2009 compared to 2008. As illustrated in the tables
9 above, the range in cost per mile between districts as well as within districts
10 has considerable variation that needs to be normalized on a system basis to
11 more accurately forecast future cost per mile projections.

12

13 Q. Are there factors in addition to tree density that are contributing to the
14 increased cost per mile?

15 A. Yes. As indicated previously, due to the losses the contractors previously
16 incurred under the contracts, the hourly contractor pricing has increased at a
17 rate higher than the historical escalation factor as indicated in the table
18 below:

	2006	2007	2008	2009	2010
Crew Rate	86.00	89.27	91.68	98.24	101.58
Escalation %	N/A	$(89.27 - 86.00)/86.00$	$(91.68 - 89.27)/89.27$	$(98.24 - 91.68)/91.68$	$(101.58 - 98.24)/98.24$

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		3.8%	2.7%	7.2%	3.4%
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1

2 Q. Is there a potential to reduce the forecasted expenditures associated with
3 completing the first cycle of the modified enhanced line clearance program?

4 A. No. Based on the miles remaining to be completed, the high probability of
5 encountering tree densities consistent with the densities experienced in
6 2009, and the increases in hourly contractor rates established through
7 contracts in place through 2011, there is very little opportunity to reduce the
8 forecasted expenditures to complete the first cycle of the modified enhanced
9 line clearance program. However, if the Commission wishes to reduce the
10 impacts on customers' rates, there are ways to levelize the expenditures.

11

12 Q. Please explain.

13 A. In my prefiled direct testimony, reducing the proposed enhanced line
14 clearance from 150 miles to 100 miles was intended to reduce the
15 incremental line clearance expenditures for the rate year ending 6/30/11 by
16 extending the time to complete the remaining 300 miles over three years
17 instead of two. Suspending the enhanced line clearance program until the
18 remaining modified enhanced miles from the first cycle are completed would
19 further reduce the required distribution line clearance expenditures.

20 Extending the completion date for the first cycle of the modified enhanced

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1 line clearance program from June 30, 2011 to December 31, 2011 would
2 also result in a levelizing of distribution line clearance expenditures.

3

4 Q. Are there any adverse impacts associated with suspending the enhanced
5 line clearance program or extending the completion date for the modified
6 enhanced line clearance program?

7 A. Yes. Suspending the enhanced line clearance program will delay improving
8 the reliability of the worst performing circuits from a tree-related outage
9 perspective. Resuming the enhanced trimming when the first cycle of the
10 modified enhanced program has been completed is strongly recommended
11 to further reduce tree related interruptions and fully realize the reliability
12 improvements outlined in the consultant's report. Extending the time
13 required to complete the modified enhanced line clearance program will
14 result in some degradation in tree related outage reliability performance for
15 the circuits that have not been maintained in over four years. The cost to
16 complete these miles is also anticipated to exceed the current forecasted
17 cost. From a longer-term perspective, extending the duration of the first
18 cycle will reduce the cost per mile savings anticipated to be realized when
19 the circuits are trimmed in the second cycle of the program. It is anticipated
20 that the re-growth that will have occurred in the nearly five years since the
21 circuits were last trimmed will result in only a slight decrease in average

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1 cost/mile for each circuit without considering the increase in the contractors'
2 hourly crew rate. It is anticipated that the benefits to customers in levelizing
3 the expenditures for the rate year ending June 30, 2011 will require similar
4 expenditures for the twelve month period ending June 30, 2012 without
5 reinstating the enhanced line clearance program.

6

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes, it does.