

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0096-TF

Tariff filing of Green Mountain Power Corporation for a 7.5% rate increase effective with bills rendered on or after October 1, 2026	
--	--

**PREFILED SURREBUTTAL TESTIMONY OF
MICHAEL E. IVEY
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE**

June 19, 2026

Summary: Mr. Ivey responds on behalf of the Vermont Department of Public Service (“Department” or “DPS”) to Green Mountain Power Corporation (“GMP”) witness Kamran Hassan’s rebuttal testimony concerning the area of pole inspection procedures that could impact efficient use of pole materials and GMP’s ongoing resiliency efforts.

Mr. Ivey Sponsors the Following Exhibit:

Exhibit DPS-MEI-3

Discovery A.DPS.GMP.3-10

PREFILED SURREBUTTAL TESTIMONY OF MICHAEL E. IVEY

1 **Q1. Please state your full name, address, and occupation.**

2 A1. My name is Michael E. Ivey. My business address is 1850 Parkway Place, Suite 800,
3 Marietta, Georgia 30067. I am Senior Project Manager at GDS Associates, Inc.
4 (“GDS”).

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

6 A2. Yes. I provided prefiled direct testimony on behalf of the Department in this proceeding
7 on April 20, 2026.

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

9 A3. My testimony responds to the rebuttal testimony of Mr. Hassan and the responses to
10 Department discovery requests.

11 **Q4. What were your understandings of the Osmose pole inspections in your direct**
12 **testimony?**

13 A4. Based on responses to discovery Q.DPS.GMP.1-166 and Q.DPS.GMP.2-69, my
14 understanding was that Osmose was inspecting poles based on pole class alone, with no
15 consideration for designs that exceeded standard design per NESC Rule 250B.¹ This
16 means they were allowing a wooden pole to decay to 2/3 of the original strength before
17 flagging it for remediation or replacement. With NESC 250B designs, wood poles are
18 allowed to decay to a 2/3 strength factor. With stronger designs for extreme wind and
19 ice, NESC Rules 250C and 250D only allow wood poles to decay to a 3/4 strength decay
20 factor. With Osmose only looking at the pole class and calculating the remaining

¹ See Exhibit DPS-MEI-2 (A.DPS.GMP.2-69).

1 strength to allow decay to 2/3 of the original strength, poles that had been designed to
2 exceed the requirements of NESC 250B were not properly inspected.

3 **Q5. Did you agree with Mr. Hassan's rebuttal testimony?**

4 A5. No. Mr. Hassan felt I did not understand the inspection process.² I have been in this
5 industry for 32 years involving various inspection services, have used Osmose for pole
6 inspection services, and have a clear understanding of the Osmose inspection process.
7 Osmose has a good inspection and treatment program but it is dependent on data and
8 feedback from the utility. In this case, it appears the program may have had some issues.

9 **Q6. What were the issues with the Osmose inspection program?**

10 A6. Per the NESC, a wood pole exceeding 60 feet in height has a higher design criterion and
11 will only be allowed to decay to 3/4 of the original strength instead of the 2/3 factor used
12 for shorter poles. In addition, there could be poles at 60 feet height and shorter that have
13 been storm-hardened and designed to a higher criterion than is required by NESC 250B.
14 According to GMP's responses, Osmose was using a 2/3 strength factor for all poles.
15 This would weaken the system for taller poles and, for shorter poles with higher design
16 criteria, would undo some of the work that went into storm-hardening the system.

17 **Q7. Did you agree with Mr. Hassan's assessment of NESC compliance in his rebuttal?**

18 A7. No. Mr. Hassan asserted that the Osmose program complied with NESC requirements.³
19 The Osmose program uses pole heights and class (the pole size rating) alone to
20 determine if the pole should exceed the requirements of NESC 250B. In addition,

² See Case No. 26-0096-TF, Hassan Rebuttal PFT at 4.

³ See *id.* at 7.

1 Osmose was only using a 2/3 strength decay factor for all poles. In addition to the
2 requirements of NESC Table 261-1 concerning decay factors, NESC Rule 012C requires
3 that “design, construction, operation, and maintenance should be done in accordance
4 with accepted good practice.”⁴ Good practice for poles exceeding the NESC 250B
5 design is to use the appropriate strength decay factor, which was not being done. Mr.
6 Hassan felt that the poles were having the appropriate decay factors applied but also
7 stated the factors were based on pole class and height which would result in the wrong
8 factor for shorter poles that have a stronger design.

9 **Q8. What was your recommendation?**

10 A8. My recommendation was that the inspections be checked against the design strength
11 required by the NESC instead of using pole class alone. There are two different decay
12 factors that come into play and without knowing when design applies, Osmose can’t
13 know which factor to use. Height alone will not yield the correct factor since shorter
14 poles can also have a stronger or storm-hardened design.

15 **Q9. Did you agree with Mr. Hassan’s opinion on this recommendation?**

16 A9. No. Mr. Hassan felt that the calculations would be too burdensome. Osmose is already
17 making a calculation of the pole strength so entering numbers in a calculator is not a
18 burdensome task. I routinely use a pole strength calculator in the office and in the field
19 and have used a calculator that Osmose produces. You must have correlation between
20 the factor used during inspection and the actual pole design or there will be a weakening

⁴ See NESC Rule 012C.

1 of the system, whether it be poles required to be designed beyond NESC 250B based on
2 height, or based on storm-hardening.

3 **Q10. What additional information has been produced regarding inspection decay**
4 **factors?**

5 A10. As indicated in GMP's response to Q.DPS.GMP.3-10, introduced here as **Exhibit DPS-**
6 **MEI-3**, GMP has discovered that Osmose was indeed using a 2/3 strength decay factor
7 for all poles rather than using a 3/4 decay factor for poles exceeding the NESC 250B
8 design.

9 **Q11. How does GMP propose to change the inspection program?**

10 A11. Osmose will use a 3/4 strength decay factor going forward for all poles subject to NESC
11 205C or 250D.⁵ I appreciate the effort GMP made to review the records and make
12 adjustments going forward.

13 **Q12. What information does GMP propose to include in the future to address changes**
14 **to the inspection program?**

15 A12. Discussions have revealed that GMP will be including information in its GIS system
16 that will allow Osmose to inspect all poles that are 60ft or higher above ground level as
17 well as all transmission and distribution poles below 60ft that are designed to Rule 250C
18 or D standards to the NESC 75% (3/4) strength factor threshold.

⁵ See Exhibit DPS-MEI-3.

1 **Q13. What are your recommendations?**

2 A13. I agree with the positive steps GMP is undertaking to provide additional information for
3 inspections going forward, and these steps align with my recommendations. This will
4 ensure that all higher-strength poles, whether they are tall poles or whether they have
5 been constructed to NESC 250C or D, will be inspected using the higher strength decay
6 factor. Likewise, this will bring the inspection process into compliance with NESC rules
7 and protect the investments being made to harden the system and improve reliability and
8 resilience. These steps by GMP will improve the inspection process and will address the
9 concerns I have raised.

10 **Q14. Does this conclude your surrebuttal testimony?**

11 A14. Yes, with the reservation of the right to supplement my testimony based on any
12 discovery responses not yet received, if necessary.