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

April 20, 2026

Summary: Ms. Flint's testimony describes themes and opinions provided by members of the public who have commented in the case record, either directly with the Vermont Public Utility Commission ("Commission") or separately to the Vermont Department of Public Service ("Department"). She also provides an opinion regarding Green Mountain Power Corporation's ("GMP" or "Company") compliance with regulatory responsibilities regarding consumer complaints, disconnections, service quality, and reporting responsibilities.

Ms. Flint Sponsors the Following Exhibits:

Exhibit DPS-CMF-1 Discovery attachment DPS.GMP.1-67

PREFILED DIRECT TESTIMONY OF CAROL FLINT

Q1. Please state your name and occupation.

A1. My name is Carol Flint. I am the Director of Consumer Affairs and Public Information ("CAPI") at the Department.

Q2. Please describe your educational background and experience.

A2. I hold a Bachelor of Arts degree with a focus in Sociology from Norwich University (Vermont College), Northfield, Vermont. I joined the Department as the CAPI Director in February of 2016. Previously, I served as Executive Director for BROC—Community Action in Southwestern Vermont beginning in 2014. Prior to that, I worked at Capstone Community Action for over 20 years, most recently as the Program Director for Family and Community Support Services.

Q3. Have you previously testified before the Commission?

A3. Yes. I have provided testimony in multiple dockets.

Q4. What is the purpose of your testimony in this proceeding?

A4. I provide summaries of the themes and opinions in public comments relevant to this proceeding, from commenters who have filed directly with the Commission or separately with the Department. I also assess GMP's fulfillment of regulatory responsibilities regarding consumer complaints, disconnections, and service quality.

Q5. Could you please describe the public comments in this case?

A5. There are 44 written public comments filed with the Commission and one additional comment filed with the Department's CAPI Division, bringing the total number of public comments to 45. This is an unusually large number of public comments for any case. It is more than double the number of comments from GMP's last full rate case in 2021 and is about on par with the most recent annual increases to the base rate under the current Multi-Year Regulation Plan ("MYRP"). Major comment themes include: (1) the burden of overall cost increases; (2) unaffordable rates and limited means; (3) affordability impacts compounded by large property tax increases; (4) requests that regulators scrutinize the rate request or even deny it; (5) burdens related to additional fees; (6) efficiency investments that have not yielded cost savings; (7) criticism of the GMP's management or ability to control costs; (8) advice that the utility do more to control costs; (9) criticism of Efficiency Vermont; and (10) concerns about lower solar credits/rates.

Summaries and anecdotes from the public comments filed with the Commission and those made directly to the CAPI Division are provided below:

1. Wanda Christine Purdy states "…with the promise of solar, wind and appliances with power savings features to reduce our bills, we still have not seen any reduction."
2. Royal B. Sargent raises concerns about affordability.
3. Chroma Technology provides that "[d]espite our ongoing efforts to reduce consumption through targeted energy efficiency investments, the financial relief we expected has not materialized — in fact, the opposite has occurred." Further, this commenter urges critical review of capital projects, generally, and grid resiliency. They raise concerns about non-energy usage fees.
4. Maria Puglisi raises affordability concerns.

5. Toni Deslaurier points to inflation, considers GMP's requested rate increase to be significant.
6. Kevin Hanson indicates that GMP's requested rate increase is about 2.5 times the rate of inflation, and the four-year cumulative increase is about 30%. "This is unmanageable for many." Mr. Hanson describes significant investment in efficiency efforts including solar, heat pumps, and an electric vehicle which resulted in fossil fuel use reductions, but the increased electric costs (and reduced solar reimbursement) have gone up.
7. Gary Saunders is critical of GMP's cost management and use of cost adders.
8. Patricia (Logan) Daughton expresses concerns about affordability, citing everyday essentials are increasing.
9. Rebecca Ware opposes the rate increase, cites affordability concerns, and asks if GMP's requested rate increase is profit driven.
10. Sharon Fantini says that the Company promises to save ratepayers money, but it never happens. Ms. Fantini says it would be nice if ratepayers could choose their power company.
11. Mika Strop indicates that he fell for "green" deals or scams, and stayed extremely conservative, and yet has been forced to pay more for liberal consumption.
12. Robin Varga is concerned about affordability and points to large property tax increases.

13. Gina Faro asks that money be spent on an aggressive education campaign about energy and the environment to help people understand that they should use less.
14. Ramona Emery opposes the rate increase. She also raises concerns about funding renewable energy and points to high taxes.
15. Christina Thompson asks that the Commission disapprove of the rate increase, stating that it is three times the cost of living increases this year.
16. April Christenson is concerned about affordability and thinks that the rate increase should be no more than the current rate of inflation.
17. Diane Foulds says that she uses six times more electricity than average non-solar residents due to her electric vehicle and heat pumps, which has resulted in her electric bill increasing this winter to about 50% of her monthly income. She asks, "How can Vermonters expect to meet the state's carbon reduction goals if our electric bills become too pricey to afford?"
18. Cheyenne Perry does not think the rate increase should be approved due to affordability concerns.
19. Clayton-Paul Cormier, Jr. asks that rates be reduced because current rates are high enough.
20. Steven A. Nichols is angry about the rate increase, points to monopoly profits and additional line items and charges.
21. Justin Daniel Turcotte says the increase is well above inflation and raises affordability concerns.
22. Freya Pendleton has electric heat and says this rate increase will be "crushing."

23. Bern Rose indicates that the increase disproportionately impacts low-income households and says that conservation is futile if base rates increase this much.
24. Rommy Fuller's comment is "greed," and they are concerned that Vermonters do not have options. They advise that "GMP pinch pennies, reduce admin salaries and make it work.…"
25. Carl Lill disapproves of the rate increase and asks that the proposed increase be stopped.
26. Christina Reiss shares their last electric bill, $465.33, and they use a heat pump for back up, which was supposed to save money. They say that "GMP needs to cut costs and Efficiency Vermont needs to go."
27. Alex MacGillivray says it is ridiculous to increase electricity rates without considering reopening our nuclear power plant or building a new nuclear power plant.
28. Jen Belotserkovsky asks that the Commission and Department disallow the rate increase.
29. Janice McCann is concerned about affordability and asks for consideration of less fortunate people.
30. Joanne Reynolds opposes the rate increase due to affordability concerns. They also do not want to pay for those who do not conserve energy.
31. Courtney Bishop, whose last electric bill was $1,200 due to heat pumps, cites affordability concerns.

32. Jonathan Weiss shares that the rate increase is a tremendous burden while GMP's corporate parent posts a 26% increase in stock value this year.
33. Paul Donaldson protests the rate increase saying it is way higher than ever paid.
34. Concerned VT Resident & Business Owner raises affordability concerns.
35. Lori Bernier urges the Commission to reject the rate increase and says that the transition to renewable energy should not come at the expense of affordability.
36. Sally Barngrove says that their electric bills have gone up 50% since 2023 and particularly since there are so many add-on charges.
37. Erik Glitman opposes the rate increases and points to cost containment at GMP as a solution. He also thinks there should be higher solar offsets.
38. John Tatro opposes the rate increase, mentions the rate of inflation is much lower, and says ratepayers are a captive audience.
39. An anonymous commenter vehemently opposes the rate increase.
40. Josephine Reynes says the rate increase is challenging and highlights GMP's monopoly status.
41. Lisa Liotta states this is not a progressive increase, citing concerns for low-income households. The comment goes on to say that conservation is futile if base rates increase by this month. Lisa Liotta suggests the burden be placed on commercial users or rates per KWH.
42. Burnham Caitlin echoes Lisa Liotta's comments citing the rate increase is an unfair ask.

43. Lauren Hibbard expresses that they are troubled by the rate increase and thinks the state should not approve any more.
44. rubyleggs@aol.com's emailed comment states that GMP's requested rate increase is ridiculous and complained that their electric bill was over $980 last month. They are concerned about affordability for senior citizens.
45. Caller to CAPI complained about the price of electricity, the unaffordability of solar, and mandatory fees.

Of note, the Commission hosted a public hearing in this proceeding. While no members of the public made comments verbally at the public hearing, members of the public participated in an information session hosted by the Department, which allowed attendees to ask questions of the Department and GMP, thereby informing any comments those attendees may have for the Commission.

Q6. Please describe the GMP base rate increases experienced by customers over the last several years.

A6. GMP now requests an increase of 7.5%. GMP discovery attachment to A.DPS.GMP.1-67, introduced here as **Exhibit DPS-CMF-1**, shows base rate increases from 2019 through now – including 5.29% in 2023, 5.26% in 2024, and 7.35% last year in 2025. As shown in **Exhibit DPS-WP-SE-2**, introduced by Department witness Mr. Shawn Enterline, GMP's cumulative base rate increase from 2022 (FY23) through 2026 (FY27), as proposed, would be 27.58%.[1]

[1] *See also* Prefiled Direct Testimony of TJ Poor and Shawn Enterline at 5, Case No. 26-0096-TF, filed 4/20/26.

Q7. How does this compare to inflation over that same period?

A7. As discussed in the testimony of Department witnesses Mr. Poor and Mr. Enterline, GMP's rate growth has been above the rate of inflation in three of the last four years.[2] Exhibit DPS-WP-SE-2 shows that the cumulative base rate increase of 27.58% between 2022 and 2026 is significantly above cumulative inflation at 12.89%. GMP's rate increases have outpaced inflation and, based on GMP's proposal, that trend is expected to continue.[3]

Q8. Affordability concerns are a consistent theme throughout the public comments. In your opinion, are those concerns well-founded?

A8. Yes. The Vermont Futures Project Economic Action Plan, which had robust statewide public input, tells us that Vermonters' top economic concern is affordability.[4] The Public Assets Institute's "State of Working Vermont" report, published in December of 2025, concludes that "it's getting harder for Vermonters to make ends meet…wages aren't keeping up with the growth in economic output."[5] **Figure 1** below, taken from that report, shows outcomes for several household types relative to the "basic needs" income threshold calculated by Vermont's Joint Fiscal Office.

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[2] *See id.*
[3] *See id.*
[4] V.T. Futures Project, Economic Action Plan 4–6 (2025), available at: https://legislature.vermont.gov/Documents/2026/Workgroups/House%20Energy%20and%20Digital/Reports%20and%20Resources/W~The%20Vermont%20Futures%20Project~Vermont%20Economic%20Action%20Plan%20Towards%20Affordability%20and%20Abundance~1-29-2025.pdf.
[5] Pub. Assets Inst., State of Working Vermont 2025 (2025), available at: https://publicassets.org/research-publications/state-of-working-vermont-2025.

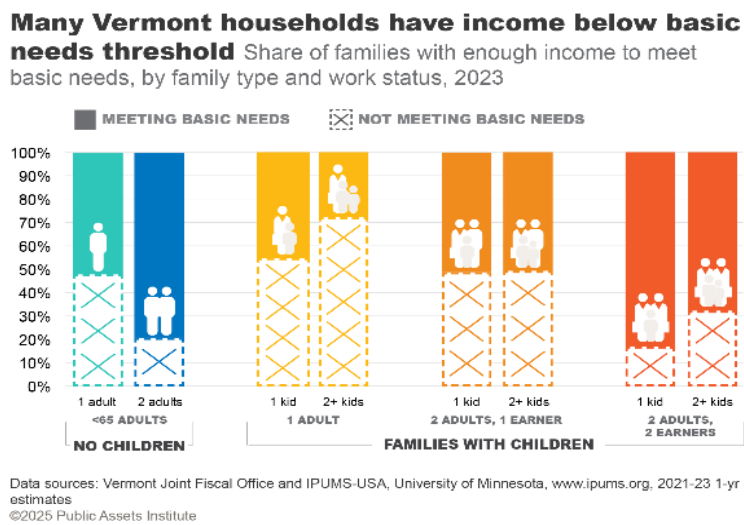

Figure 1: Household income and basic needs

The federal Household Pulse Survey indicates that, as of September 2024, 23% of Vermonters were unable to pay an energy bill in the last 12 months (survey cycle August 20 – September 16, 2024).[6] A significant number of Vermonters remain cost-burdened for housing. Although slight improvements are shown between 2021 and 2024, likely due to modest income gains during that period, 31% of Vermont households pay 30% or more of their income for housing – including utility costs. Renters are more cost-burdened than homeowners, with 48% paying at least 30 percent of their income toward housing, and 24% paying half of their income or more (severely cost-burdened).[7] This is shown in **Figure 2** below.

[6] U.S. Census Bureau, Household Pulse Survey Interactive Tool, https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00050&s_metro= (last visited 4/20/26).
[7] Housing Cost Burden, Vermont Housing Finance Agency, housingdata.org/profile/housing-needs/cost-burden (last visited 4/20/26).

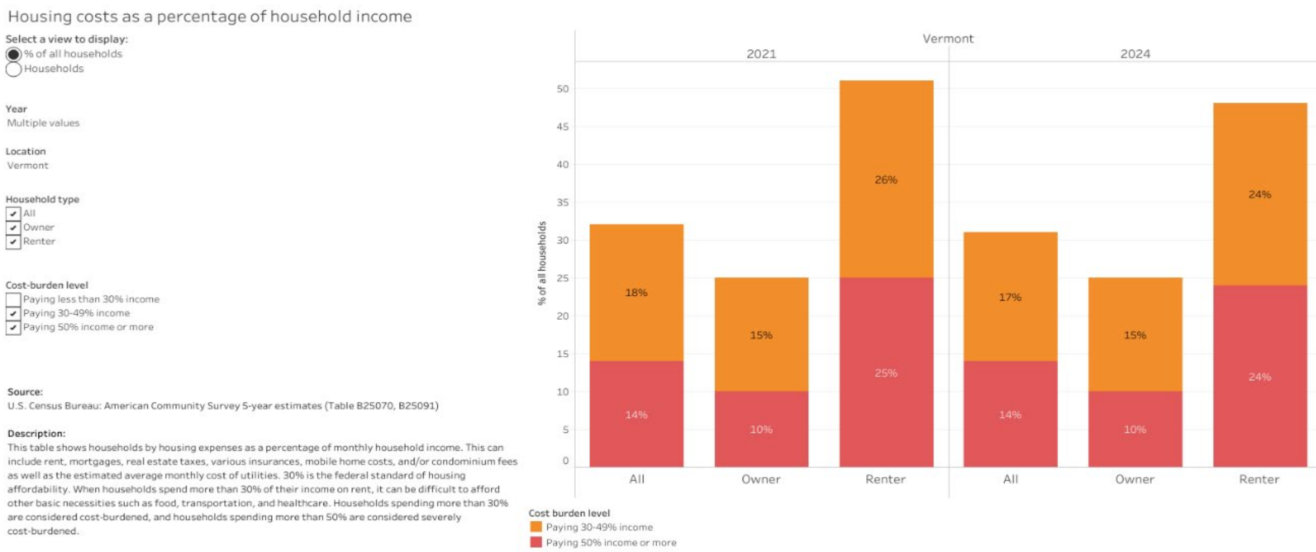

Figure 2: Housing costs as a percentage of household income[8]

Q9. Some public comments cite concerns regarding the sum of fees, adjustors, and charges in their electric bills. What are these various fees and adjustors?

A9. Exhibit DPS-CMF-1 lists the various usage rates over the last several years with peak and off-peak kWh details, along with customer charges, credits, discounts, fees and the electric assistance program charge.[9] The "adjustor" tab of the exhibit separately lists several adjustors charged over the years. Those include the power adjustor (2018 – 2020); exogenous change adjustor (renamed past storm and power fixed charge 2020, 2021, 2022); emerald ash borer adjustor (2020, 2021, 2022); current energy/major storm adjustment (2022 through 2027); and the major storm restoration fund fee (2023 through 2026). The percent surcharge ranges from .0108 for the power adjustor (not charged currently) to the current energy/major storm adjustment of 7.61%, which includes summed

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[8] *Id*.
[9] *See* Exhibit DPS-CMF-1 (GMP Discovery Attachment DPS.GMP.1-67).

values for the earnings sharing adjustor FY23–FY25 and approved quarterly changes in the Power Supply and Retail Revenue Adjustor/Exogenous Major Storm Adjustor. Exhibit DPS-CMF-1 does not include the efficiency charge, but the sample bills provided in response to discovery question Q.DPS.GMP.1.68 confirm that the GMP does bill for the energy efficiency charge. Sample bills also show that the major storm restoration fund is alternatively called the Extreme Storm Restoration Fund. An excerpt from a sample bill for Residential Rate 1 (the least complicated rate) is inserted here as **Figure 3**, showing the six lines of various charges.

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Bill Details Rate 1 Residential

Rate: E01 Residential

New Charges/Adjustments

Customer Charge: 32 Days @ $0.626	$20.03
325 Total KWH @ $0.21457	$69.74
Energy Efficiency Charge 325 x $0.01074	$3.49
Current Energy/Major Storm Adjustor	$4.83
Extreme Storm Restoration Fund	$0.65
Electric Assistance Program Fee	$1.50
New Charges/Adjustments due by 03/02/26	$100.24

Figure 3: Sample bill, Residential Rate 1

Q10. Are adjustors part of the 27.58% cumulative rate increase mentioned previously?

A10. No. The base rate increase impacts the customer charge, volumetric charges for usage, the energy efficiency charge, and other fees detailed in tariffs that are impacted by the base rate increase. The adjustors have a separate surcharge detailed on the bill.[10]

[10] *See* Figure 3; *see also* Exhibit DPS-CMF-1.

Q11. Is uncollectible debt (arrearages) a significant part of GMP's rate increase?

A11. No. The Department's Finance and Economics Division determined that the uncollectible expenses account for 1.43% of the total requested revenue adjustment, or 0.11% of the 7.50% requested rate increase.

Q12. Has GMP met its reporting obligations for residential disconnections?

A12. Yes. The utility is up to date with its reporting.

Q13. Have you seen any concerning trends in the number or rate of disconnections of residential accounts by GMP?

A13. No. However, there are trends that warrant closer attention. GMP's disconnection reporting shows that there were 1,649 "disconnections for arrearages of $301+" in April 2025, a 28% increase over that same month the prior year (1,193). The number of households that remained disconnected (not reconnected within 15 days) increased from 183 in April 2024 reporting to 276 in April 2025 reporting. Overall, GMP's disconnection rate is about half that of other investor-owned utilities in the U.S.[11]

Further analysis of residential bills, bill averages, collection practices, and disconnection practices is warranted to determine if disconnections are actively utilized to keep arrearages from growing or if "disconnections for arrearages of $301+" is no longer the correct number to use for reporting due to sizeable increases in electric bills since the reporting

[11] Data from the Energy Justice Lab Disconnections Dashboard, https://utilitydisconnections.org/dashboard/index.html, indicates a disconnection rate of .21% by investor owned utilities in Vermont (Green Mountain Power) for the years 2021 through 2025. As of 2022, the average disconnection rate by investor-owned utilities was .4%. *Infographics and Factoids*, Indiana University Energy Justice Lab, https://utilitydisconnections.org/infographics-factoids/index.html.

metrics were established years ago. The Department recommends that its CAPI Division staff and GMP staff discuss best practices for disconnections and collections, including (1) how the reported data informs these practices; and (2) whether this reporting metric is still useful or should be adjusted.

Q14. What did your review of complaint data yield?

A14. Staff reviewed complaints made against GMP for each of the years 2021 through 2025. CAPI staff investigated more than three hundred complaints made against GMP over that time period. There were no escalations for regulated complaints in 2025. Complaints about assistance with payment arrangements have been declining (32 in 2023 down to only 10 in 2025). Outreach to assist consumers who have been approved for three or more medical notes increased in 2025 to 44, up from only 24 in 2024 and 10 in 2023. **Figure 4** shows the number of complaints filed from 2021 through 2025.

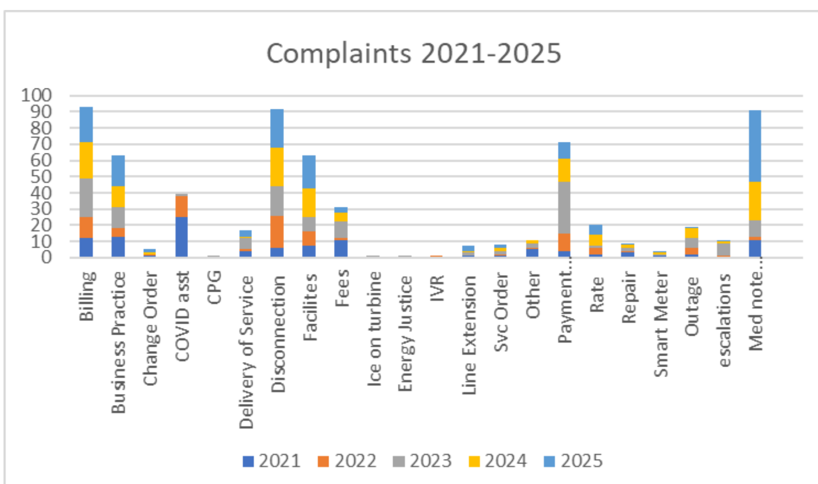

Figure 4: Number of complaints filed per year by category, 2021-2025

Anecdotes from CAPI staff that are relevant to the rate case include:

1. A question as to whether rising rates are tied to increased demand from large energy users, such as proposed data centers, and expressed concern that infrastructure costs could be shifted onto residential ratepayers.
2. One customer reported being charged approximately $500 in a single month for service to a home and garage, describing the bill as "as much as a mortgage payment" and expressing concern about affordability.
3. Another customer contacted CAPI with repeated questions about charges and "multiple lines of fees" on their bill, expressing confusion about how costs are calculated and whether equipment on their property was contributing to higher charges.

Q15. What is your opinion of GMP's complaint handling and responsiveness?

A15. GMP's complaint handling is very good, prompt, and responsive in addressing concerns represented to CAPI by the Company's customers.

Q16. Has GMP met its service quality reporting requirements and associated metrics in its Service Quality Reporting Plan?

A16. CAPI staff reviewed GMP's 2025 service quality reports and found the utility submitted them in a timely manner with complete data and supplementary information, including additional resilience-related metrics. The Company also filed required Corrective Action Plans following both the second and third quarters, where performance standards were not met. GMP proactively reached out to the Department and initiated a meeting to discuss performance issues and to request input on how best to document and address them.

Overall, GMP met its call-answering performance standard (calls answered within 30 seconds) for the full year after correcting reporting issues that were identified during a detailed data review. These issues included duplicate call counts from an overflow vendor and internal or non-customer calls being included in reporting. Corrections to these items resulted in improved and more accurate performance results.

GMP did not meet the call-abandonment standard in the second and third quarters of 2025. The utility identified contributing factors, including increased call complexity, longer average handling times (up 23% since 2023), and a decrease in how long customers wait before abandoning calls (down 18% since 2023). These trends continued into the third quarter, though improvements were observed, including a decrease in call handling time and a 22% decrease in abandoned calls compared to Q2. Corrective Action Plans were submitted as required and included steps such as enhanced staff training, improved monitoring of call metrics, updates to Interactive Voice Response messaging, increased staffing and overflow support, and operational changes to reduce peak call volume impacts. Additional actions taken in Q3 included adjusting the timing of customer notices to reduce call spikes and hiring additional call-center staff. GMP reports that these actions are contributing to improved performance, although abandonment rates remained above standard in Q2 and Q3.

Customer satisfaction remained high throughout the year, reported at 92% for the annual survey. GMP remains in compliance with reporting requirements and has demonstrated responsiveness in identifying issues, correcting data inaccuracies, engaging with the Department, and implementing measures to improve service performance.

Q17. Does that conclude your testimony?

A17. Yes, it does.