

Q.DPS.GMP.3-32: In reference to Michael Burke Rebuttal Testimony (pp. 16–17, Q13), where Mr. Burke states that “the performance standard for these projects is set initially at an average of 1.5 outages per Resilience Project per year,” please:

- a. Explain how GMP selected the 1.5 outage performance standard, including whether it is based on historical performance of similar circuits or projects, engineering judgment, a policy target, or another basis;**
- b. Provide any analyses, data, or benchmarking used to support the selection of the 1.5 outage threshold;**
- c. Identify the historical outage frequency (including average and distribution) for comparable circuits or segments prior to resilience work, and how those values compare to the proposed 1.5 outage standard; and**
- d. Explain whether and how the 1.5 outage standard is expected to evolve over time as additional performance data becomes available.**
- e. Does this proposed 1.5 outage standard align with GMP's assumptions for outage frequency reductions in its BCA?**
- f. If the 1.5 outage standard does not align with GMP's assumptions for outage frequency reductions in its BCA, please explain why a decision to make an investment should be based at least in part on information in the BCA that uses one value, but performance toward expected outcomes of the investment should be measured by a different value.**

A.DPS.GMP.3-32:

- a. GMP proposed a 1.5 outage performance measure based on many factors, including review of the existing project performance for projects of similar construction methods and recently installed ZOI projects, as well as field experience and engineering experience. We considered the sample period that ZOI projects have been in the field, the fact that we are including major storms and other non-weather-related events in the standard, and most importantly the need to develop an interim measure while more data on resilience projects is collected. The resulting measure is intended to balance these considerations and provide a starting point that can evolve when more data is available.
- b. For completed project performance, please refer to Mr. Burke's prefiled direct testimony in Case No. 26-0096-TF at 19-20 ,22-24 and at 29 (describing a reduction in 1-year SAIDI on the EJ-G7 circuit from 102 down to 6.59 after the first resilience projects were completed); Exhibit GMP-MB-4 (showing a reduction of 94% for Customer Hours Out (CHO) during high wind storms on the EJ-G7 over historical levels); and also Attachment DPS.GMP.2-4 and Attachments DPS.GMP.2-9(a) and (b). These initial outcomes are very promising but are also a small sample size during a relatively mild storm year (compared to 2022-2024). We took these factors into account in setting this performance measure, which is intended to be an interim standard until more data is available.

- c. For segments reviewed on early resilience projects on the VH4A and V60 lines, the proposed 1.5 standard represents an approximately 80-85% reduction in outages in that segment compared to the average outages over the past ten years prior to resilience work (2015-2023). See Attachments DPS.GMP.2-9(a) and (b). The segments proposed for resilience work are all similarly located on GMP's worst-performing circuits. For circuit-wide outage data, see GMP's annual 4.900 reports for 2020-2024, see also Exh. GMP-MB-4 for circuit values; and the prefiled direct testimony of Michael Burke at 29 (describing circuit-wide improvement relative to historical data).
- d. Yes, we expect the measure will evolve as we collect more data.
- e. The target level is generally consistent with the assumptions underlying the BCA. See subpart c. above describing how the proposed standard represents approximately an 80-85% reduction on key segments we have reviewed; this standard can evolve as more data becomes available.
- f. n/a.

Person/s Responsible for Response: Mike Burke
Title of Person/s: VP, Operations
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