

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Company
d/b/a Rhode Island Energy

Docket No. 23-38-EL

RE: Petition for Acceleration Due to
DG Project – Weaver Hill Projects

PREFILED DIRECT TESTIMONY OF

**Gregory L. Booth, PE
President, Gregory L. Booth, PLLC
On Behalf of the Rhode Island Division of Public Utilities and Carriers**

April 17, 2024

Prepared by:
Gregory L. Booth, PE
14460 Falls of Neuse Road, Suite 149-110
Raleigh, North Carolina 27614
(919) 441-6440
gboothpe@gmail.com

Prefiled Direct Testimony of
Gregory L. Booth, PE, President
Gregory L. Booth, PLLC

On Behalf of the Rhode Island Division of Public Utilities and Carriers
Docket No. 23-38-EL

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Exhibits:

GLB-1 Gregory L. Booth Curriculum Vitae

1 advisory member of the National Rural Electric Cooperative Association (“NRECA”)-
2 Cooperative Research Network, which is an organization similar to EPRI.

3 **Q. PLEASE BRIEFLY DESCRIBE YOUR EXPERIENCE WITH ELECTRIC**
4 **UTILITIES.**

5 A. I have worked in the area of electric utility and telecommunication engineering and
6 management services since 1963. I have been actively involved in all aspects of electric
7 utility planning, design and construction, including generation, transmission, and
8 distribution systems, and North American Electric Reliability Corporation (“NERC”)
9 compliance.

10 **Q. HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT BEFORE THE RHODE**
11 **ISLAND PUBLIC UTILITIES COMMISSION?**

12 A. Yes. I have testified before the Rhode Island Public Utilities Commission on numerous
13 matters, including Docket Nos. 2489, 2509, 2930, 3564, 3732, 4029, 4218, 4237, 4307,
14 4360, 4382, 4770/4780, 4473, 4483, 4513, 4539, 4592, 4614, 4682, 4783, 4857, 4915,
15 4995, 5077, 5098, 5209, 5235, D-11-94, D-17-45, and D-21-09. My testimony in Rhode
16 Island has included filed and live testimony on previous Electric Infrastructure, Safety and
17 Reliability Plan Fiscal Year Proposal filings by National Grid in Docket Nos. 4218, 4307,
18 4382, 4473, 4539, 4592, 4682, 4783, 4915, 4995, 5098, 5209, 22-53-EL and 23-48-EL.

19 **Q. HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT IN OTHER**
20 **JURISDICTIONS?**

21 A. I have testified before the Federal Energy Regulatory Commission (“FERC”) and
22 numerous state commissions, including in Connecticut, Delaware, Florida, Georgia,
23 Maine, Maryland, Massachusetts, Minnesota, New Jersey, North Carolina, Pennsylvania,

1 South Carolina and Virginia. Attached is Exhibit GLB-1 Gregory L. Booth Curriculum
2 Vitae.

3
4 **II. PURPOSE OF TESTIMONY**

5 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

6 A. The purpose of my testimony is to address the Petition of Narragansett Electric Company
7 d/b/a as Rhode Island Energy (“Company” or “RIE”) for Acceleration of a System
8 Modification Due to Distributed Generation Project; Weaver Hill Project dated October
9 17, 2023 (the “Petition”). The Distributed Generation interconnection requests that are the
10 subject of the Petition were made by Green Development, LLC (“Green” or “Green
11 Development”), Revity Energy, LLC (“Revity”), and Energy Development Partners
12 (“EDP”). The Company and Green Development entered into an Interconnection Service
13 Agreement (“Green ISA”) on July 22, 2020 related to a 20,000 kW photovoltaic system
14 located at 899 Nooseneck Hill Road, West Greenwich, Rhode Island 02817 (“Nooseneck
15 Projects”) which was amended by the Company and Green Development on December 9,
16 2021 and December 16, 2022. On May 16, 2022, the Company and Revity entered into an
17 Interconnection Service Agreement (“Revity ISA”) for the purpose of interconnecting
18 Revity’s 40.7 MW photovoltaic system located at 18 Weaver Hill Road, West Greenwich,
19 Rhode Island 02817 (“Robin Hollow Project”) to the Company’s Electric Power System
20 (“EPS”), which was amended by the Company and Revity on July 29, 2022 and April 26,
21 2023. On April 14, 2023, the Company issued an Interconnection Service Agreement to
22 EDP (“EDP ISA”) for the purpose of interconnecting EDP’s 9.2 MW Studley Solar Project
23 located at 189 Weaver Hill Road, West Greenwich, Rhode Island 02817 (“Studley Solar
24 Project”) to the Company’s EPS. My analysis, testimony and recommendations are

1 presented on behalf of the Division and are intended to equitably apply the tariff in order
2 to protect the integrity of the tariff and the ratepayers.

3
4 **III. OVERVIEW AND SYSTEM IMPROVEMENTS**

5 **Q. WHAT HAS THE COMPANY STATED AS ITS BASIS FOR FILING THE**
6 **PETITION?**

7 A. The Company's stated basis is R.I. Gen Laws §39-26.3-4.1, entitled *Interconnection*
8 *Standards* (the "Interconnection Statute"), and Section 5.4 of RIPUC No. 2258, entitled
9 *The Narragansett Electric Company Standards for Connecting Distributed Generation*
10 (the "Interconnection Tariff" or "Tariff").

11 **Q. DO YOU AGREE THE INTERCONNECTION TARIFF SHOULD APPLY TO**
12 **THIS FILING?**

13 A. Yes.

14 **Q. DO YOU AGREE WITH THE COMPANY'S METHOD FOR APPLYING THE**
15 **TARIFF?**

16 A. I do not agree with the Company's method of applying the Interconnection Tariff.

17 **Q. BEFORE DISCUSSING THE DETAILS OF YOUR ANALYSIS AND WHY YOU**
18 **DISAGREE WITH THE COMPANY'S METHOD OF APPLYING THE TARIFF,**
19 **WOULD YOU PROVIDE AN OVERVIEW OF YOUR ANALYSIS AND**
20 **DISAGREEMENTS?**

21 A. Yes. I have performed an assessment of the Weaver Hill Project including reviewing ISR
22 Plan materials, Area Study materials, system engineering models, and area peak loads
23 which the Company relied upon to determine the need and timing of system improvements
24 considered in this Petition. In its original Area Study, the Company proposed Weaver Hill

1 to alleviate overloads on Hopkins Hill 63F6 (“Hopkins Hill”) and Coventry 54F1
2 (“Coventry”) feeders projected at 104 percent and 94 percent loaded respectively in 2035
3 (page 29). However, the load has been declining since the time the Area Study was
4 performed, eliminating any near-term need for the Weaver Hill project. My assessment
5 indicates the system improvements in the Weaver Hill Area do not need to be installed
6 within five years from the time the Company began the Impact Study of the proposed
7 Nooseneck Projects (Green Development); Robin Hollow Project (Revity); and Studley
8 Solar Project (EDP). The Impact Studies were started April 1, 2019, January 6, 2020 and
9 August 7, 2019 respectively. Under the Company’s proposal, the Weaver Hill project
10 installation would not occur before 2027 or well beyond the five years from the start of
11 the Impact Studies.

12 **Q. CONTINUING YOUR OVERVIEW, WOULD YOU DISCUSS THE ISR PLAN**
13 **AND AREA STUDY AS IT RELATES TO WEAVER HILL?**

14 A. The FY 2024 ISR Plan, filed in 2022, included the first engineering work for the Weaver
15 Hill project and by that time all the impact and interconnection studies had been finalized.
16 What this means is the DG was already the precipitating reason for the Weaver Hill project.
17 There is not a baseline Area Study case for the Weaver Hill project with existing loads and
18 no DG. Based on existing data and analysis, my opinion is that the improvements do not
19 need to be included in an ISR Plan for capital improvement expenditure absent the DG
20 projects before 2035, particularly considering the decline in loading on Hopkins Hill and
21 Coventry feeders. Loading data from RIE in FY 2025 ISR Plan materials¹ indicate much
22 lower loads with Hopkins Hill projected at 88 percent in 2024 and Coventry at 84 percent
23 with little or no future load growth. The Company’s previously projected overloads have

¹ FY 2025 ISR Plan, Docket 23-48-EL, Attachment DIV 1-2.

1 not materialized. My analysis determined the Weaver Hill project would not be required
2 until 2035 or later, which would be nearly fifteen years after the DG impact studies
3 commence. This is well beyond the reimbursement eligibility period of five-years as
4 established in the Tariff (Petition, page 9). This means that under the Interconnection
5 Tariff, there should not be any reimbursement to the DG customers as proposed by the
6 Company. The Company, however, has taken a more liberal view of tariff's intent while
7 ignoring the actual Interconnection Tariff language. The Company disregards the tariff
8 language and proposes reimbursement anyway. The Company's recommendation
9 represents a deviation from its own Interconnection Tariff. I will discuss in detail my
10 assessment and how I reached my conclusion and recommendation.

11 **Q. DO YOU HAVE ANY DISAGREEMENT WITH THE SYSTEM IMPROVEMENTS**
12 **PROPOSED BY THE COMPANY?**

13 A. Yes. Considering the existing loads and nearly flat load growth and the fact that there is no
14 overload now, any minor growth issues can be addressed with power factor correction
15 using capacitors and voltage correction using voltage regulators. These are prudent interim
16 solutions when the issues are not immediate and would cost a fraction of what the Company
17 proposes in this Petition. Furthermore, the peak loads on both circuits are projected to
18 exceed 100 percent capacity ratings for a very short period of time if they do develop at
19 all, occurring as little as one hour in a year (DIV 2-5). Capital investments of a few hundred
20 thousand dollars is much more appropriate than millions for a problem which may not
21 occur at all and, if it does, the duration would be very short. Additionally, the existing and
22 near term ISR Plans have many more critical projects to be advanced before the Weaver
23 Hill project. The Weaver Hill project is required exclusively to accommodate the DG. The
24 Company should not pay for any portion of that differential under any circumstances.

1 **Q. DOES THE COMPANY APPROPRIATELY APPLY SECTION 5.4 OF THE**
2 **INTERCONNECTION TARIFF TO THE WEAVER HILL PROJECT?**

3 A. No. The Company provides Section 5.4 language in its testimony (pages 8-11) and follows
4 with its rationale on its applicability, mainly that “the System Improvements that have been
5 accelerated by the Green Development’s Weaver Hill Projects are System Modifications
6 that also benefit Revity, and EDP” (page 12). The Company specifically petitions that
7 “Green Development, Revity, and EDP shall fund the System Improvements subject to
8 repayment of the depreciated value of the System Improvement as of the time the System
9 Improvement would have been necessary” (page 14). The Company contends that the
10 Project should be “accelerated”. which is that the “modification is otherwise identified in
11 the Company’s work plan as a necessary capital investment to be installed within a five-
12 year period as of the date the Company begins the impact study of the proposed distributed
13 generation (DG) project (defined as an Accelerated Modification)”. (Interconnection
14 Tariff, Section 5.4.c). As stated earlier, the Company commenced the three Impact Studies
15 on April 1, 2019, January 6, 2020 and August 7, 2019. The Weaver Hill project, even if
16 implemented as the Company identified in its Area Study with higher loads than are
17 actually occurring, will not be installed until 2027 or later. The installation date for the
18 Weaver Hill project is well beyond the five-year limitations period that determines if a
19 capital investment is “accelerated” under the plain language of Section 5.4 of the
20 Interconnection Tariff. DG reimbursement, therefore, is not available.²

21 **Q. THE COMPANY STATES ON PAGE 21 OF ITS PETITION THAT THE WEAVER**
22 **HILL ROAD SUBSTATION IS IN THE FY 2023 ISR PLAN DOCKET 5209 AND**

² The Company, itself, does not take its petition very seriously. In its petition, the Company “proposes that it would begin recovering depreciation and return from distribution customers *in FY 2025 through the ISR plan revenue requirement.*” (Petition, Page 24, lines 16-18). Since making that request, the Company and Division agreed that the Company will forego its requested relief, reserving its right to recover it in an unspecified future proceeding.

1 **THAT THE CENTRAL RI WEST AREA STUDY EVALUATED THE ISSUES AND**
2 **PROPOSED THE SOLUTION. IS THAT AN ACCURATE CHAR-**
3 **ACTERIZATION?**

4 A. I find that characterization very misleading. The Weaver Hill substation and sub-
5 transmission construction were not FY 2023 ISR Plan projects but only referenced as a
6 potential future project. However, the FY 2023 ISR Plan was filed December 20, 2021
7 during the finalization of the Central RI West Area Study which is dated September 2022.
8 It would have been speculative to include the Weaver Hill project in the FY 2023 ISR Plan.
9 While the Area Study does show Weaver Hill as a solution for a potential 2035 problem,
10 the project would not be constructed now since there are much less expensive interim
11 solutions and the actual loads and overloading are not occurring at this time or in the near
12 term. Absent the DG projects, there is nothing causing Weaver Hill substation to be
13 advanced at this time.

14 **Q. ON PAGE 22 OF THE PETITION THE COMPANY IN ITS TESTIMONY**
15 **DISCUSSES OVERLOADING WHICH WILL EXIST IN 2035 AND THAT**
16 **WEAVER HILL SUBSTATION IS THE LEAST COST SOLUTION FOR THIS**
17 **2035 OVERLOAD. IS THAT ACCURATE CONSIDERING TODAY'S**
18 **INFORMATION?**

19 A. No. The Company discusses the Hopkins Hill feeder loading at 104 percent but it is only
20 88 percent today and is not expected to increase much beyond that by 2035. It is important
21 to note that the Area Study indicated Hopkins Hill feeder 63F6 would be loaded to 102
22 percent in 2020 and yet now it is only expected to be loaded to 88 percent in 2024.
23 Exaggerated overload conditions are also being put forth by the Company for the Coventry
24 feeder 54F1. The Area Study showed it to be loaded to 93 percent in 2020 and yet now it

1 is expected to be loaded to 84 percent in 2024. Actual peak loads for both feeders have
2 declined from 2021 and 2023 (see response to DIV 2-2). The present-day facts are clear.
3 There is not an imminent overload concern on either feeder and will not be until 2035 and
4 beyond. This is most certainly more than five-years after the 2019 and 2020 impact studies
5 were started.

6 **Q. THE COMPANY ON PAGE 24 OF ITS TESTIMONY STATES THE PROJECT**
7 **WILL BE COMPLETED IN FY 2025 BUT WOULD HAVE BEEN COMPLETED**
8 **IN FY 2027 WITHOUT THE DG PROJECTS. THE COMPANY ALSO PROPOSES**
9 **PAYING THE DEVELOPERS AT THE TIME THE PROJECT IS PLACED IN**
10 **SERVICE. DO YOU AGREE WITH THIS?**

11 A. I do not. First, absent the DG projects, as I have stated earlier, the Weaver Hill substation
12 would have been delayed well beyond 2027 to 2035 or later. The year 2027 in service date,
13 if even achieved, is more than five years after the 2019 start of the Impact Study, and thus
14 outside the Tariff.

15 **Q. THE WEAVER HILL PROJECT WILL NOT BE INSTALLED WITHIN THE**
16 **FIVE-YEAR LIMITATIONS PERIOD AS REQUIRED BY THE**
17 **INTERCONNECTION TARIFF. DO YOU AGREE WITH THE COMPANY'S**
18 **RATIONALE FOR PROPOSING DG REIMBURSEMENT WHEN THE PROJECT**
19 **DEVIATES FROM THE TARIFF'S REQUIREMENTS?**

20 A. I do not. The Interconnection Tariff language was developed to balance infrastructure
21 development and cost responsibility by establishing specific timelines when investments
22 can be considered for cost sharing. Loosely applying the standards, regardless of the level
23 of perceived benefits, leads to premature system investments and requires the expenditure
24 of capital that could otherwise be used for imminent and more critical projects.

1 My analysis is the product of applying the Interconnection Tariff’s plain language and its
2 obvious meaning. The Interconnection Tariff provides the regulatory-approved processes
3 and requirements that govern when DG projects, like these DG projects, are to receive
4 accelerated treatment. The general body of ratepayers should not reimburse DG developers
5 now for project work that the Company claims will only be installed after the tariff
6 limitations period has expired, and in any event, based on my analysis, will not be needed
7 for years beyond the five-year period, if at all.

8 **Q. IN THE COMPANY’S RESPONSE TO DIVISION DATA REQUEST DIV 3-4, IT**
9 **STATES “THERE ARE MANY CASES WHERE PROJECT ACCELERATION**
10 **CAN STILL PROVIDE BENEFITS AHEAD OF THE NEED DATE.” DO YOU**
11 **AGREE WITH THIS STATEMENT?**

12 A. While I agree this statement is accurate, it has no applicability in the Tariff. The Tariff sets
13 out standards for considering reimbursement which is not a test of whether a project that
14 was accelerated provides benefits ahead of the need date. The Tariff reimbursement
15 requires the determination of the need date and if the project is intended within five years
16 of the start of an Impact Study, then reimbursement is applied. The fact that a project may
17 provide benefits ahead of the need date is irrelevant in determining when a Distributed
18 Generator is eligible for reimbursement under the Tariff.

19 **Q. IN THE COMPANY’S RESPONSE TO THE DIVISION’S DATA REQUEST DIV**
20 **3-1, IT INDICATES THE DATE THAT A SYSTEM ISSUE IS INCLUDED IN AN**
21 **ISR PLAN IS NOT THE EARLIEST DATE THAT THE INVESTMENT IS**
22 **NEEDED. DO YOU CONCUR WITH THAT POSITION TAKEN BY THE**
23 **COMPANY?**

1 A. I do not concur with that position. First, just because the Company may desire a project be
2 included in the ISR Plan does not mean it is actually needed at that time. Second, the project
3 desired by the Company may not be the least expensive solution. Third, there may be other
4 solutions which will extend the date the project is needed allowing the Company to
5 determine if the future load requiring the project actually materializes. Lastly, the Company
6 and Division collaborate on the ISR Plan and the Commission provides a final approval of
7 a particular plan and budget. Affordability and risks are added components of the final
8 decision which very often push projects such as the Weaver Hill project out well beyond
9 the Company's preferred early, but not justified, completion date. Therefore, the date for a
10 project implementation must consider when it is most likely to be incorporated into an ISR
11 Plan and not the earliest date the Company may desire the project for risk reduction or
12 revenue enhancement.

13

14 **IV. AREA STUDY AND ISR PLAN ANALYSIS**

15 **Q. PLEASE BRIEFLY DESCRIBE YOUR ANALYSIS PROCESS.**

16 A. I have been involved in the ISR Plan process on behalf of the Division since its inception.
17 I have been involved in the analysis and conferences with the Company concerning every
18 aspect of the ISR Plan process, Area Studies performed from 2014 to 2021, and the recently
19 delivered Long-Range Plan in the FY 2025 ISR Plan filing. The Division, much like the
20 Company, uses Area Studies to assist in development of the ISR Plan discretionary capital
21 projects. The study outcomes are not considered sanctioned capital investments by the
22 Division or approved capital investments by the Commission, but rather a level of guidance
23 for many ISR Plan projects. While these studies provide a view of the future needs and are
24 consolidated in a Long-Range Plan, they do not establish what will become acceptable in

1 future ISR Plans. To be clear, the Long-Range Plan is not an approved capital investment
2 plan but rather the Company's strategic view of future needs based on stressing the system
3 beyond most likely loading levels. The actual loads and system conditions are dynamic and
4 constantly changing. Projects proposed in the Area Studies and Long-Range Plan must be
5 carefully assessed based on existing loads, forecasts and conditions before being advanced.
6 The Division has not completed the Long-Range Plan analysis process and will have
7 further conferences with the Company. My annual ISR Plan review includes evaluating the
8 need and prioritization of proposed projects, including those driven by Area Studies. I rely
9 on numerous information sources for my review and assessment including my first-hand
10 knowledge of the past and present ISR Plans, Area Studies together with their CYME
11 engineering models, field assessment of substations with asset condition issues, asset
12 condition reports, and system reliability and loading analyses. All this analysis forms a
13 basis of certain criticality for existing and future projects, with a focus on identifying
14 projects justified for implementation now based on actual system conditions versus those
15 that can be deferred. The ISR Plans are based on this analysis, a collaborative process with
16 the Company, and a balance of criticality with affordability and risk assessment and
17 tolerance. All the Company's proposed work cannot be accomplished immediately, nor is
18 it affordable to do so.

19 **Q. HOW DO THE AREA STUDY AND ISR PLAN ANALYSES RELATE TO THE**
20 **WEAVER HILL PETITION?**

21 A. The Company's Petition states, among other things, that the interconnection of the DG
22 project has accelerated the Weaver Hill project; suggests the need for system investments
23 in the Weaver Hill area; that the Company's 5-year and beyond capital investment plan
24 includes system investments in the Weaver Hill area through calendar year 2027; and

1 opines that absent the interconnection of the DG projects, the Company anticipates making
2 the system improvements by 2027. The Company relies on these submittals to justify its
3 proposed DG reimbursement. I used the Company's Central Rhode Island West Area Study
4 and Weaver Hill project assumptions to assess the actual need and timing of the system
5 improvement that is the subject of the Petition. To do this I evaluated system actual loads,
6 forecasted loads, and engineering models to confirm whether system conditions would
7 require the stated improvements. I then evaluated the criticality of the system issues
8 requiring the improvement, comparing the need for the investment against other
9 discretionary work to determine if the Company's anticipated completion of the project by
10 2027 will be necessary.

11 **Q. WHAT IS YOUR OVERALL ASSESSMENT OF THE NEED AND TIMING OF**
12 **THE SYSTEM IMPROVEMENT IDENTIFIED AS THE WEAVER HILL**
13 **PROJECT?**

14 A. The system improvement identified in the Company's Area Study and Petition are new
15 34.5 kV sub-transmission lines proposed to interconnect DG customers which the
16 Company would then utilize to feed the Weaver Hill modular substation. The Area Study
17 is premised on the fact that the DG customers are going to interconnect; therefore, the
18 Company does not have an Area Study including the base case for Weaver Hill substation
19 that assumes the DG customers do not exist. I prepared a feeder loading analysis which the
20 Company contends is what mandates the Weaver Hill project. The actual loads are far
21 below the Company's projections. It appears the Company is forecasting loads to be
22 increasing at unrealistic rates to place excess load on the two purported overloaded circuits.
23 This then suggests thermal overload and low voltage, and a risk to customer service and
24 reliability which does not exist.

1 **Q. WHAT ARE THE RESULTS OF YOUR ANALYSIS OF THE NEAR-TERM**
2 **REQUIREMENT FOR THE WEAVER HILL MODULAR SUBSTATION AND 35**
3 **KV LINE TO SERVE THE SUBSTATION?**

4 A. The projected loads in the Area Study driving the need for the Weaver Hill project are far
5 in excess of existing loads and are not realistic projections. For example, RIE projected
6 overloads in 2022 and 2023 on Hopkins Hill circuit when the actual circuit loads were 87
7 percent and 77 percent respectively (see response to DIV 2-2). The projected loads of 544
8 and 549 amperes for 2022 and 2023 were actually only 459 and 409 amperes, and thus
9 some 26 percent below the projections. On the surface, it appears RIE is significantly over
10 projecting load level in order to overbuild the system capacity.

11 **Q. WHAT ARE THE RESULTS OF YOUR ANALYSIS OF YOUR LONG-TERM**
12 **REQUIREMENT FOR THE WEAVER HILL PROJECT?**

13 A. There is very little projected load growth and most likely no load growth on the Hopkins
14 Hill or Coventry circuits. That means voltage or loading violations are very unlikely
15 through the end of the study period or 2035. Therefore, the Weaver Hill project absent the
16 DG projects would not be incorporated into an ISR Plan before 2035.

17 **Q. WHY NOT SOLVE ANY POTENTIAL CRITERIA VIOLATIONS NOW WITH**
18 **THE WEAVER HILL PROJECT?**

19 A. Voltage and power factor violations exist on many of the RIE feeders. Capacitors and
20 voltage regulators are inexpensive and rapid deployment solutions which can solve many
21 short-term issues should they arise. In addition, the Company's projected overloading of
22 the circuits is not occurring now and load is actually declining, making a near term solution
23 unnecessary. There are many asset condition substation projects which should take priority

1 in the ISR Plans over any Weaver Hill project in the near term, particularly since the actual
2 loads are not dictating any immediate action on the two circuits.

3 **Q. YOU MENTIONED PRIORITIZING SUBSTATION ASSET CONDITION**
4 **PROJECTS. CAN YOU EXPLAIN YOUR REASONING?**

5 A. Yes. The Company identified a minimum of sixteen (16) substations which have
6 substantially deteriorated assets. Most of the equipment and infrastructure is obsolete and
7 unreliable, creating both safety and reliability concerns. The Division and its consultant
8 visited these substations to verify the level of asset condition and the priority of stations
9 for significant improvement projects. These stations represent a significant level of capital
10 investment over the next five plus years. The substations serve a large number of customers
11 and have a much higher priority than marginal loading and reliability issues on two feeders
12 that the Weaver Hill project would be intended to solve. Thus, the substation projects will
13 result in budgetary pressure to further delay single circuit marginal or even declining
14 issues, particularly when these reliability issues can be solved with relatively inexpensive
15 short-term solutions.

16 **Q. ARE THERE ANY OTHER BUDGETARY PRESSURES WHICH WOULD**
17 **FURTHER DICTATE DELAYING THE WEAVER HILL PROJECT ABSENT**
18 **THE GENERATION INTERCONNECTIONS?**

19 A. Yes. There are long-standing programs such as the UG Program which is addressing the
20 upgrades to the underground duct bank system in areas, such as Providence, which are
21 approaching or are more than 100 years old. Additionally, there is a URD program which
22 involves direct buried vintage cable replacement and numerous other long standing asset
23 condition programs which have far higher criticality than two feeders with marginal or no
24 overloading issues now or projected in the near term. Tariff and engineering concerns

1 aside, the Commission should not compromise major asset condition programs to advance
2 the Weaver Hill project far ahead of its need.

3
4 **V. RECOMMENDATIONS AND CONCLUSIONS**

5 **Q. WHAT CONCLUSIONS HAVE YOU REACHED?**

6 A. The Weaver Hill project even with the DG projects would not be constructed and in service
7 until well beyond the five-year window after the impact studies were started. The Weaver
8 Hill project absent the DG projects would not be required in an ISR Plan until 2035 or
9 beyond. The Company has stated in its testimony that the decision is driven by public
10 policy and its assumption that the DG developers will be able to reinvest the capital and
11 install additional distributed generation, however this is speculative as there is no
12 restriction on how the funds could be used by developers, The following is a summary of
13 the timelines as contained in Company exhibits EJRS-1; EJRS-2 and EJRS-3. The
14 Nooseneck Project Impact Study started 4/1/2019 and was finalized 6/29/2020. The Robin
15 Hollow Project Impact Study started 1/6/2020 and was finalized 4/21/2021. The Studley
16 Solar Project Impact Study started 8/7/2019 and was finalized 9/20/2022. In its testimony
17 on page 24, line 14, the Company says the Weaver Hill project would have been completed
18 and placed in service in FY 2027 without the DG project. Whereas, on page 22 lines 3
19 through 5 of the Company's testimony it indicates the Area Study identified overloads or
20 near overloads in 2035. The load does not warrant the Weaver Hill project until 2035 or
21 later. The Company's timeline indicates the Weaver Hill Project is beyond the Tariff five-
22 year period for reimbursement based on the start date of any one of the three Impact
23 Studies. There is no scenario in which the DG projects qualify for reimbursement.

1 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?**

2 A. The Company's Petition should be denied in its entirety.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

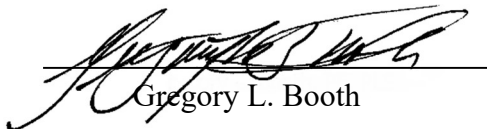
4 A. Yes.

AFFIDAVIT OF GREGORY L. BOOTH, PE

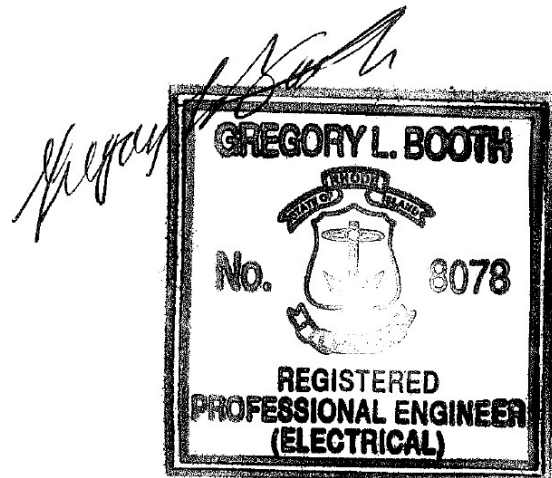
Gregory L. Booth, does hereby depose and say as follows:

I, Gregory L. Booth, on behalf of the Rhode Island Division of Public Utilities and Carriers, certify that testimony, including information responses, which bear my name was prepared by me or under my supervision and is true and accurate to the best of my knowledge and belief.

Signed under the penalties of perjury this the 17th day of April, 2024.


Gregory L. Booth

I hereby certify this document was prepared by me or under my direct supervision. I also certify I am a duly registered professional engineer under the laws of the State of Rhode Island, Registration No. 8078.



Gregory L. Booth, PE

**CURRICULUM VITAE OF
GREGORY L. BOOTH**

February 2023

**RESUME OF
GREGORY L. BOOTH, PE, PLS
President
Gregory L. Booth, PLLC**

Gregory L. Booth is a registered professional engineer with engineering, financial, and management services experience in the areas of utilities, industry private businesses and forensic investigation. He has been representing over 300 clients in some 40 states for more than 50 years. Mr. Booth was inducted into the North Carolina State University Electrical and Computer Engineering Alumni Hall of Fame in November of 2016 based on his accomplishments in the field of engineering.

Mr. Booth has been accepted as an expert before state and federal regulatory agencies, including the Federal Energy Regulatory Commission, the Delaware Public Service Commission, the Connecticut Public Utilities Regulatory Authority, Florida Public Service Commission, the Minnesota Department of Public Service Environmental Quality Board, the Maine Public Utilities Commission, the Massachusetts Department of Public Utilities, the New Jersey Board of Public Utilities, the North Carolina Utilities Commission, the Pennsylvania Public Utility Commission, the Rhode Island Public Utilities Commission, and the Virginia State Corporation Commission. Mr. Booth has provided expert witness services on over 500 tort case matters, and over 50 regulatory matters. Investigation and testimony experience includes areas of wholesale and retail rates, utility acquisition, territorial disputes, electric service reliability, right-of-way acquisition and impact of electromagnetic fields and evaluation of transmission line options for utility commissions.

He has been accepted as an expert in both state and federal courts, including Colorado, Delaware, District of Columbia, Florida, Georgia, Kansas, Maryland, Minnesota, Missouri, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Puerto Rico, South Carolina, Texas, Virginia, West Virginia, Virgin Islands, and Wisconsin, and numerous Federal Court jurisdictions. Mr. Booth has extensive experience serving as an expert witness before state and federal courts on matters including property damage, forensic evaluation, fire investigations, fatality, and areas of electric facility disputes and Occupational, Safety and Health Administration violations and investigations together with National Electrical Code and National Electrical Safety Code and Industry Standard compliance.

The following pages provided are the education and experience from 1963 through the present, along with courses taught and publications.

**RESUME OF
GREGORY L. BOOTH, PE, PLS**

Mr. Booth is a Registered Professional Engineer with engineering, financial, and management experience assisting local, state, and federal governmental units; rural electric and telephone cooperatives; investor owned utilities, industrial customers and privately owned businesses. He has extensive experience representing clients as an expert witness in regulatory proceedings, private negotiations, and litigation.

**PROFESSIONAL
EDUCATION:**

NORTH CAROLINA STATE UNIVERSITY; Raleigh NC,
Bachelor of Science, Electrical Engineering, 1969

**PROFESSIONAL
HONORS:**

Inducted into North Carolina State University Department of Electrical
and Computer Engineering Alumni Hall of Fame in November 2016.

REGISTRATIONS:

Registered as Professional Engineer in Alabama, Arizona, Colorado,
Connecticut, Delaware, District of Columbia, Florida, Georgia, Kansas,
Maryland, Minnesota, Mississippi, Missouri, New Hampshire, New
Jersey, North Carolina, Oklahoma, Pennsylvania, Rhode Island, South
Carolina, Texas, Commonwealth of Virginia, West Virginia, and
Wisconsin
Professional Land Surveyor in North Carolina
Council Record with National Council of Examiners for Engineering and
Surveying

EXPERIENCE:

1963-1967
Technician
Booth & Associates

Transmission surveying and design assistance, substation design
assistance; distribution staking; construction work plan, long-range
plan, and sectionalizing study preparation assistance for many utilities,
including Cape Hatteras EMC, Halifax EMC, Delaware Electric
Cooperative, Prince George Electric Cooperative, A&N Electric
Cooperative; assistance generation plant design, start-up, and
evaluations.

1967-1973
Project Engineer
Booth & Associates

Transmission line and substation design; distribution line design;
long-range and construction work plans; rate studies in testimony
before State and Federal commissions; power supply negotiations; all
other facets of electrical engineering for utility systems and over 30
utilities in 10 states.

1973-1975
Professional Engineer
Associates
1975-1994
Executive Vice President
Booth & Associates

Directed five departments of Booth & Associates, Inc.; provided
engineering services to electric cooperatives and other public Booth &
power utilities in 23 states; provided expert testimony before state
regulatory commissions on rates and reliability issues; in accident
investigations and tort proceedings; transmission line routing and
designs; generation plant designs; preparation and presentation of long-
range and construction work plans; relay and sectionalizing studies; relay
design and field start-up assistance; generation plant designs; rate and
cost-of-service studies; reliability studies and analyses; filed testimony,
preparation and teaching of seminars; preparation of nationally published
manuals; numerous special projects for statewide organizations,
including North Carolina EMC. Work was provided to over 130 utility
clients in 23 states, PWC of the City of Fayetteville, NC, Cities of

Wilson, Rocky Mount and Greenville are among the utilities in which I have provided engineering services in North Carolina during this time frame. Services to industrial customers include Texfi Industries, Bridgestone Firestone, Inc and many others.

1994-2004
President
Booth & Associates

Responsible for the direction of the engineering and operations of Booth & Associates, Inc. for all divisions and departments. The engineering work during this time frame has continued to be the same as during 1974 through 1993 with the addition of greater emphasis on power supply issues, including negotiating power supply contracts for clients; increased involvement in peaking generation projects; development of joint transmission projects, including wheeling agreements, power supply analyses, and power audit analyses. The work during this time frame includes providing services to over 200 utility clients across the United States, including NCEMC and NRECA.

2005-July 2019
President
PowerServices, Inc.

Providing engineering and management services to the electric industry, including planning and design and utility acquisition. Providing forensic engineering, product evaluation, fire investigations and accident investigation, serving as an expert witness in state and federal regulatory matters and state and federal court.

2004-Present
President
Gregory L. Booth, PLLC

Providing engineering and management services to the electric industry, including planning and design. Providing forensic engineering, product evaluation, fire investigations and accident investigation, serving as an expert witness in state and federal regulatory matters and state and federal court.

**WORK AND
EXPERTISE:**

ELECTRIC UTILITIES:
(more than 300 clients)

- All aspects of utility planning, design and construction, from generation, transmission, substation and distribution to the end user.
- Utility acquisition expert, including providing condition assessment, system electrical and financial valuation, electrical engineering assessment, initial Work Plan and integration plans, acquisition loan funds, testimony, assessment and consulting services for numerous electric utility acquisitions. Utility clients for acquisition projects include Winter Park, FL acquisition of Progress Energy, FL, system in the City limits, A & N Electric Cooperative acquisition of the Delmarva Power & Light Virginia jurisdiction, Shenandoah Valley Electric Cooperative acquisition of Allegheny Energy Virginia jurisdiction, Rappahannock Electric Cooperative acquisition of Allegheny Energy Virginia jurisdiction, and numerous other past and currently active electric utility acquisitions.
- System studies, including long-range and short-range planning, sectionalizing studies, transmission load flow studies, system stability studies (including effects of imbalance and neutral-to-earth voltage), environmental analyses and impact studies and statements, construction work plan, power requirements studies, and feasibility studies.

- Fossil, hydro, microgrid, wind, and solar generation plan analysis, design, and construction observation.
- Transmission line design and construction observation through 230 kV overhead and underground, including interface with DOT and other utilities.
- Switching station and substation design and construction observation through 230 kV.
- Distribution line design and staking, overhead and underground, including interface with DOT and other utilities.
- Design of submarine cable installations. (Transmission and distribution)
- Supervisory control and data acquisition system design, installation and operation assistance.
- Load management system design, installation and operation assistance.
- Computer program development.
- Load research and alternative energy source evaluation.
- Field inspection, wiring, and testing of facilities.
- Relay and energy control center design.
- Mapping and pole inventories.
- Specialized grounding for abnormal lightning conditions.
- Ground potential rise protection.
- Protective system/relay coordination.
- Grid Modernization Plan development, regulatory testimony, and implementation
- Pole Attachment Agreements, rate design, and testimony

UTILITY OPERATIONS:

- Storm assessment services., including interface with DOT and other utilities
- Regulatory testimony on storm response.
- Storm Response Plan development.
- Operations, including outage management and Call Centers.
- Outage management and operations enhancement services and testimony.

**GENERATION DESIGN /
FAILURE ANALYSES:**

- Intermediate and peaking generation (gas and oil fired through 400 MW).
- Peaking generation (diesel and gas through 10,000 kW)
- Wind generation.
- Solar (PV) generation.
- Hydroelectric generation.
- Microgrid, including energy storage.

**TELECOMMUNICATION:
UTILITIES:**

- Subscriber and trunk carrier facilities design.
- Stand-by generation and DC power supplies
- DC-AC inverters for interrupted processor supplies.
- Plant design and testing.
- Fiber optics and other transmission media.
- Microwave design.
- Pole attachment designs and make-ready design.
- Pole Attachment Agreements and rental rates calculations.
- Regulatory testimony.

FINANCIAL SERVICES:

- Long-term growth analyses and venture analyses.
- Lease and cost/benefit analyses.
- Capital planning and management.
- Utility rate design and service regulations.
- Cost-of-Service studies.
- Franchise agreements.
- Corporate accounting assistance.
- Utility Commission testimony (State and Federal)

FORENSIC ENGINEERING:

- Compliance with NESC, NEC, OSHA, IEEE, ANSI, ASTM and other codes and industry standards, including DOT standards.
- Equipment and product failure and analysis and electrical accident investigation (high and low voltage equipment).
- Stray voltage, electrical shocking, and electrocution investigations.
- Building code investigations.
- New product evaluation.
- MCC, MDP failure analysis and arc flash analysis
- Electrical fire analysis

INDUSTRIAL/ELECTRICAL ENGINEERING:

- Building design (commercial and industrial).
- Building code application and investigation. (NFPA and NEC)
- Electric thermal storage designs for heating, cooling, and hot water.
- Standby generation and peaking generation design.
- Electric service design (residential, commercial, and industrial).

INSTRUCTIONAL SEMINARS AND TEXT:

- Seminars taught on arc flash hazards and safety, including National Electrical Safety Code regulations for utilities.
- Courses taught on Distribution System Power Loss Evaluation and Management.
- Courses taught on Distribution System Protection.
- Text prepared on Distribution System Power Loss Management.
- Text prepared on Distribution System Protection.
- Seminars taught on substation design, NESC capacitor application, current limiting fuses, arresters, and many others electrical engineering subjects.
- Courses taught on accident investigations and safety.
- Courses taught on Asset Management.
- Courses taught on OSHA and Construction Safety.

TESTIMONY AS AN EXPERT:

- Concerning rate and other regulatory issues before Federal Energy Regulatory Commission and state commissions in Connecticut, Delaware, Florida, Maine, Maryland, Massachusetts, Minnesota, New Jersey, New Hampshire, North Carolina, Pennsylvania, Rhode Island, and Virginia.
- Concerning property damage or personal injury before courts in Colorado, Delaware, District of Columbia, Florida, Georgia, Kansas, Maryland, Minnesota, Missouri, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Puerto Rico, South Carolina, Texas, Virginia, West Virginia, Virgin Islands, and Wisconsin.

FIELD ENGINEERING:

- Transmission line survey and plan and profile.
- Distribution line staking.
- Property surveying.
- DOT highway relocation design.
- Relay and recloser testing.
- Substation start-up testing.
- Generation acceptance and start-up testing.
- Ground resistivity testing.
- Work order inspections.
- Operation and maintenance surveys.
- Building inspection and service facility inspection.
- Construction Management
 - Generation
 - Transmission
 - Substation
 - Distribution
 - Building Electrical Installations
 - GSA construction projects
 - NASA construction projects
 - University construction projects

**PROFESSIONAL
ORGANIZATIONS:**

- a. National Society of Professional Engineers (NSPE)
- b. Professional Engineers in Private Practice (PEPP)
- c. National Council of Examiners for Engineering & Surveying (NCEES)
- d. Professional Engineers of North Carolina (PENC)
- e. National Fire Protection Association (NFPA)
- f. Associate Member of the NRECA
- g. NRECA Cooperative Network Advisory Committee (NRECA-CRN)
- h. The Institute of Electrical and Electronics Engineers (IEEE)
(Distribution sub-committee members on reliability)
- i. American Standards and Testing Materials Association (ASTM)
- j. Occupational Safety and Health Administration (OSHA) Certification
- k. American Public Power Association (APPA)
- l. American National Standards Institute (ANSI)

**FEDERAL & STATE
REGULATORY
CASE LIST**

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

Colorado Public Utility Regulatory Authority

2015

The City of Lamar, Colorado, Colorado Mills LLC, Palace Holdings, LLC, Ports of Plains Travel Plaza and Jeanna Dewitt
2014CV30031

Commonwealth of Virginia State Corporation Commission

1976

Approximately 1976 - 1981 A&N Electric Cooperative Retail Rates Cases
(WT) (HE)

2007

Delmarva Power & Light System Acquisition Purchase by A & N Electric Cooperative, Post Office Box 290, 21275 Cooperative Way, Tasley, VA 23441 and Old Dominion Electric Cooperative, 4201 Dominion Boulevard, Glen Allen, VA 23060
Case Nos. PUE-2007-00060, 00061, 00062, 00063, and 00065
(WT) (HE)

2009

Potomac Edison/Allegheny Power System Acquisition Purchase by Shenandoah Valley Electric Cooperative, 147 Dinkel Ave., Hwy 257, Mt. Crawford, VA 22841
Case No. PUE-2009-00101
(WT) (HE)

2009

Potomac Edison/Allegheny Power System Acquisition Purchase by Rappahannock Electric Cooperative, 247 Industrial Court, Fredericksburg, VA 22408
Case No. PUE-2009-0010
(WT) (HE)

2011

Virginia, Maryland & Delaware Association of Electric Cooperatives Commonwealth of Virginia at the relation of the State Corporation Commission in the Matter of Determining Appropriate Regulation of Pole Attachments and Cost Sharing in Virginia
Case No. PUE-2011-00033
(WT) (HE)

2013

Northern Virginia Electric Cooperative Pole Attachment Dispute with ComCast
PUE-2013-00055
(WT) (HE)

2016

A&N Eastern Shore of Virginia Broadband Authority

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

Connecticut Public Utilities Regulatory Authority

2017

The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules on behalf of the Connecticut Office of Consumer Counsel

Docket No. 17-10-46

(HE)

2018

PURA Investigation into Distribution System Planning of the Electric Distribution Companies on behalf of the Connecticut Office of Consumer Counsel

Docket No. 17-12-03

(HE)

2020

Phases II and III and IV Subdockets RE02 thru RE09 and RE11 Regarding AMI, Battery Storage, Electric Vehicles, Innovative Technology Applications & Programs, Non-Wires Alternatives, Resilience & Reliability, Clean and Renewable Energy, Interconnection Standards & Practices, Rate Design, RE11
17-12-03

2020

PURA Implementation of Section 3 of Public Act 19-35, Renewable Energy Tariffs and Procurement Plans

20-07-01

2021

Annual Review of Rate Adjustment Mechanism of United Illuminating Company

21-08-02

2021

Annual Non-Residential Renewable Energy Tariff Program Review – Year 1

21-08-03

2021

Annual Review of Storage Program – Year 1

21-08-05

2021

Annual Review of Electric Vehicle Charging Program – Year 1

21-08-06

2021

Application To Install and Operate an Electric Submetering System at 1 Long Wharf Drive, New Haven, CT

21-08-07

2021

Petition to Establish a Docket Pertaining to Public Act 21-162, An Act Concerning the Solicitation of New Fuel Cell Electricity Generation Projects

21-08-08

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2021

Application of AEP Onsite Partners, LLC for Qualification of 0 High Street, Willimantic, Ct as a Class I Renewable Energy Source

21-08-11

2021

Investigation into Medium and Heavy-Duty Electric Vehicle Charging

21-09-17

2022

Public Act 22-55, Energy Storage Systems and Electric Distribution on System Reliability

22-06-05

2022

Application of The United Illuminating Company to Amend Its Rate Schedule

22-08-08

2023

Annual Electric Distribution Company Reliability and Resilience

23-08-09

Delaware Public Service Commission

1976

Approximately 1976 – 1985 Delaware Electric Cooperative, Inc., Retail Rate Case and Reliability Cases (WT) (HE)

2018

Delaware Distribution Planning Process Phase II

18-0935

(Report)

2018

Delaware Distribution Planning Process, Phase I

18-0935

(Report)

2018

In The Matter of the Petition of the Public Service Commission Staff and Delaware Division of the Public Advocate to Establish a Regulation for Distribution System Investment Plans for Delaware Electric and Natural Gas Utilities

18-0935

(Report)

2020

Delaware Distribution Planning Process Phase III

18-0935

(Report)

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2020

Evaluation of the Delmarva Power & Light Company's infrastructure, Safety, and Reliability Plan for the period of July 1, 2020 to June 30,2020

18-0935

(Report)

2020

Application of Delmarva Power & Light Company for an Increase in Electric Base Rates

20-0149

(Report)

2020

Consecutive Estimation Program

20-0226

2022

2022-2024 Electric Infrastructure, Safety and Reliability Plan

22-0320

(Report)

2022

2023-2032 Long Range Distribution Plan

22-0506

2022

2022 Delmarva Power Rate Case

Docket No. 22-0897

2023

2023-2025 Electric Infrastructure, Safety and Reliability Plan

23-0460

(Memorandum)

Federal Energy Regulatory Commission

Public Works Commission of the City of Fayetteville, NC v. Carolina Power & Light Company

ER76-, ER77-, ER78, ER81-344, ER84-

(WT) (HE)

2000

North Carolina Electric Membership Corporation v. Duke Energy Corporation and Duke Electric Transmission

ER01-282-000 and ER01-283-000

(WT) (HE)

2000

North Carolina Electric Membership Corporation v. Virginia Electric Power Company dba North Carolina Power

EL90-26-00-000

(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2015

Application for Authorization Pursuant to Section 203(a)(1)(A) and 203(a)(2) of the Federal Power Act and Request for Waivers of Certain Filing Requirements on behalf of New Jersey Division of Rate Counsel

Dkt EC15-157-000

(Report)

Florida Public Service Commission (PSC)

2007

Municipal Utility Underground Consortium Pre-Filed Testimony for Storm Hardening and Undergrounding Assessment

Docket Nos. 07023-EI, 080244-EI, and 080522-EI

(WT) (HE)

2007

Gulf Power Company's Storm Hardening Plan Pre-filed Testimony on Behalf of City of Panama City Beach, Florida

Florida PSC Docket No. 070299-EI

(HE)

Georgia Public Service Commission

2020

Notice of Proposed Rulemaking to Adopt Rule 515-12-1-.36, Pole Attachment Agreements

Docket No. 43453

(WT) (HE)

Maine Public Utilities Commission

2016

Efficiency Maine Trust Request for Examination of Voltage Optimization Pilot Program Docket No. 2016-00162 on behalf of Maine Office of Public Advocate

Dkt. 2016-00162

(WT) (HE)

2017

Investigation into the Designation of Non-Transmission Alternative (NTA) Coordinator on behalf of Maine Office of Public Advocate

Docket No. 2016-00049

(WT) (HE)

2017

Investigation of Inclusion of Acadia Substation Investment in Rates Pertaining to Emera Maine on behalf of Maine Office of Public Advocate

Docket No. 2017-00018

(WT) (HE)

Public Service Commission of Maryland

1976

1976 Approximately 1976 – 1985 A&N Electric Cooperative Retail Rate Cases

(WT) (HE)

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

Massachusetts Department of Public Utilities

2012

Massachusetts Attorney General's Office Commonwealth of Massachusetts Department of Public Utilities
Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid Review for Storm
Response and Recovery of 2008 Storm Costs

DPU 11-56

(WT) (HE)

2012

Massachusetts Attorney General's Office Western Massachusetts Electric Company, Northeast Utilities
System, Review for Recovery of Storm Costs

DPU 11-102/DPU 11-102A

(WT) (HE)

2013

Massachusetts Attorney General's Office Nstar Review for Recovery of Storm Costs

DPU 13-52

(WT) (HE)

2014

Massachusetts Attorney General's Office National Grid Solar Generation Phase II Program Assessment

D.P.U. 14-01

(WT) (HE)

2014

Massachusetts Attorney General's Office Western Massachusetts Electric Company, Review of Storm
Recovery Reserve Cost Adjustment "SRRCA"

D.P.U. 13-135

(WT) (HE)

2016

Massachusetts Attorney General's Office MA Elec. Co. and Nantucket Elec. Co. d/b/a National Grid,
Fitchburg Gas and Elec. Light Co. d/a/a Unitil and NSTAR Elec. Co. d/b/a Eversource for Approval by
the DPU of their Grid Modernization Plan

DPU 15-120, 15-121, 15-122/15-123

(WT) (HE)

2017

Massachusetts Attorney General's Office Nstar Electric Company and Western Massachusetts Electric
Company d/b/a Eversource Energy Petition for Approval of a Performance-Based Ratemaking
Mechanism and General Distribution Revenue Change

DPU 17-05

(WT) (HE)

2017

Massachusetts Attorney General's Office Petition of Massachusetts Electric Company and Nantucket
Electric Company each d/b/a National Grid for Pre-Approval of Enhanced Vegetation Management Pilot
Program

DPU 17-92

(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2018

Massachusetts Attorney General's Office Massachusetts Eversource Performance Based Ratemaking Mechanism Performance Metrics
DPU 18-50

2018

Massachusetts Attorney General's Office Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid Storm Cost Recovery
DPU 18-94

2019

Massachusetts Attorney General's Office National Grid Rate Case
DPU 18-150

Minnesota Department of Public Service/Environmental Quality Board

Transmission Line Assessment Minnesota Department of Public Service and Minnesota Environmental Quality Board
(HE)

New Hampshire Public Utilities Commission

1985

Approximately 1985 - 1995 Other Cases on Behalf of the New Hampshire Public Utilities Commission Staff

2004

City of Bedford v. Public Service of New Hampshire

New Jersey Board of Public Utilities

1978

Approximately 1978 - 1985 Sussex Rural Electric Cooperative Retail Rate Cases
(WT) (HE)

2004

New Jersey Board of Public Utilities, Focused audit of the planning, operations and maintenance practices, policies and procedures of Jersey Central Power & Light Company
Docket No. EX02120950
(WT) (HE)

2015

Jersey Central Power & Light Company ("JCP&L") and Mid-Atlantic Interstate Transmission, LLC ("MAIT") FERC 7 Factor Test Evaluation on behalf of New Jersey Division of Rate Counsel
BPU Docket No. EM15060733
(WT)

2016

Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for an Increase in Rates and Charges For Electric Service Pursuant to NJSA 48:2-21 and JJSA 48:2-21.1 on behalf of New Jersey Division of Rate Counsel
DPU Docket No. ER16030252 OAL Docket No. PUC 5556-16

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

North Carolina Utilities Commission

1990

Delora Dennis, et. al. v. Haywood EMC
E-7, Sub 474, EC-10, Sub 37, E013, Sub 151
(WT) (HE)

1990

In Approximately 1990's Larry Eaves, et. al. v. Town of Clayton
(WT) (HE)

1990

In approximately 1990's Poly-Loc v. Town of Tarboro
(WT) (HE)

2001

Wake EMC Right of Way Acquisition
(TE)

2002

Progress Energy Carolinas, Inc., v. E.M. Harris, Jr. Family Limited Partnership, Edward M. Harris, III and wife Pamela M. Harris, Gene K. Harris and wife Linda Harris, Camille H. Cunnup and husband Timothy J. Cunnup Siler City Transmission Line Issues
General Court of Justice Superior Court Division, File No. 03 CVS SP 251, 252, 253, 254, 255
(WT) (HE)

2004

John Wardlaw, et. al. Interveners v. Progress Energy Carolinas
Docket No. E-2, Sub 855
(WT) (HE)

2011

Frontier Communications of the Carolinas, Inc. v. Blue Ridge Mountain Electric Membership Corporation
11-CVS-17175

2017

Jones-Onslow Electric Membership Corporation; Surry-Yadkin Electric Membership Corporation; Carteret-Craven Electric Membership Corporation; Union Electric Membership Corporation, d/b/a Union Power Cooperative v. Time Warner Cable Southeast, LLC
NCUC Docket Nos. EC-43 5888, EC-49 555, EC55 570 and EC-39 S44
(WT) (HE)

2017

Blue Ridge Electric Membership Corporation v. Charter
Docket No EC-23, SUB 50
(WT) (HE)

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

Pennsylvania Public Utility Commission

2004

Investigation regarding the Metropolitan Edison Company Pennsylvania Electric Company and Pennsylvania Power Company Reliability Performance on behalf of Allegheny Electric Cooperative and its Member Cooperatives

Docket No. I-00040102

(WT) (HE)

2006

Investigation regarding Pennsylvania Rural Electric Association / Allegheny Electric Cooperative and its Member Cooperatives Rates

Docket Nos. R-00061366, R-0061367, et. al.

(WT) (HE)

2007

Wellsboro Electric Company participants Included C&T Enterprises, Inc., comprised of Wellsboro Electric Company, Claverack Rural Electric Cooperative, Inc., Tri-County Rural Electric Cooperative, Inc., and Citizens Electric

Docket No. P-2008-2020257

(WT) (HE)

2014

Allegheny Electric Cooperative and its Member Cooperatives 2014 Intervention Assistance, Analysis of Service Reliability Concerns Regarding West Pennsylvania Power Company, Pennsylvania Electric Company, Metropolitan Edison Company (First Energy Company)

Docket Nos. R-2014-2428742, -2428743, -2428744, -248745

(WT) (HE)

2015

MAIT and PENELEC for Authorizing the Transfer of Certain Transmission Assets from MET-Ed & PENELEC to MAIT on behalf of Wellsboro Electric Company

A-2015-2488903 (cons.)

Rhode Island Public Utilities Commission

1997

1990 - 1997 Other Matters Before the Rhode Island Public Utilities Commission on behalf of Rhode Island Division of Public Utilities and Carriers

(WT) (HE)

1997

Testimony before the Rhode Island Public Utilities Commission, on behalf of Rhode Island Division of Public Utilities and Carriers, May 15, 1997

Docket No. 2489

(WT) (HE)

2003

Testimony before the Rhode Island Public Utilities Commission on behalf of Rhode Island Division of Public Utilities and Carriers December 2003

Docket No. 2930

(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2004

Issuance of Advisory Opinion to Energy Facility Siting Board Regarding The Narragansett Electric Company's Application to Relocate Transmission Lines Between Providence and East Providence on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 3564

(WT) (HE)

2006

Issuance of Advisory Opinion to Energy Facility Siting Board Regarding the Narragansett Electric Company d/b/a National Grid's Application to Construct and Alter Major Energy Facilities, on behalf of Rhode Island Division of Public Utilities and Carriers, 2004

Docket No. 3732

(WT) (HE)

2007

Issuance of Advisory Opinion to RIDPUC in the Matter of the Joseph Allard Fatality Involving Verizon and National Grid on behalf of Rhode Island Division of Public Utilities and Carriers

2008

Issuance of Advisory Opinion to Energy Facility Siting Board Regarding the Narragansett Electric Company d/b/a National Grid's Application to Construct and Alter Major Energy Facilities, on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4029

(WT) (HE)

2010

Rhode Island Division of Public Utilities and Carriers Narragansett Tariff Investigation on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. R.I.P.U.C. 4065

2010

National Grid Proposed Electric Infrastructure, Safety and Reliability Plan for FY 2012 Submitted Pursuant to R.I.G.L. § 39-1-27.7.1 on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4218

(WT) (HE)

2012

National Grid Electric FY 2013 Electric Infrastructure, Safety and Reliability Plan on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4307

(WT) (HE)

2012

National Grid Hurricane Irene Response Assessment, 2012 on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. D-11-94

(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2012

Public Utilities Commission Review of Storm Contingency Funds of Electric Utilities on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 2509

(WT) (HE)

2012

Commission's Investigation Relating to Stray and Contact Voltage on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4237

(Annual Reports 2012 through 2022)

2012

Rhode Island Public Utilities Commission Interstate Reliability Assessment on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4360

(WT) (HE)

2012

National Grid Electric Infrastructure, Safety, and Reliability Plan for 2014 on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4382

(WT) (HE)

2014

National Grid Electric Infrastructure, Safety, and Reliability Plan 2015 Proposal on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4473

(WT) (HE)

2014

National Grid's FY 2016 Electric Infrastructure, Safety and Reliability Plan on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4539

(WT) (HE)

2015

Division's Investigation into Verizon's Vegetation Management Practices on behalf of Rhode Island Division of Public Utilities and Carriers

2015

Wind Energy Development, LLC (WED) and ACP Land, LLC Petition for Dispute Resolution Relating to Interconnection on behalf of Rhode Island Division of Public Utilities and Carriers

Docket No. 4483

(WT)

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2018

RIDPUC Streetlight Pilot Metering Program Docket 4513 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4513

2015

National Grid Electric Infrastructure, Safety, and Reliability Plan FY 2017 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4592
(WT) (HE)

2016

PUC Advisory Opinion Regarding Need of The Narragansett Electric Co. d/b/a National Grid to Construct and Alter Certain Transmission Components in the Towns of Portsmouth and Middletown (Aquidneck Island Reliability Project) on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4614

2016

National Grid Electric Infrastructure, Safety, and Reliability Plan FY 2018 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4682
(WT) (HE)

2017

National Grid Electric Infrastructure, Safety, and Reliability Plan FY 2019 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4783

2017

Narragansett Electric Company d/b/a National Grid's October 2017 Storm Response on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. D-17-45

2019

Capital Efficiency Mechanism - Adoption of Performance Incentives for The Narragansett Electric Company d/b/a National Grid Pursuant to R.I. Gen. Laws Section 39-1-27.7.1(e)(3) to Apply to the Electric Infrastructure, Safety, and Reliability Plans on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4857

2018

National Grid Electric Infrastructure, Safety and Reliability Plan FY 2020 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4915
(WT) (HE)

2019

RIDPUC Block Island Transmission Deficiencies Evaluation on behalf of Rhode Island Division of Public Utilities and Carriers

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2019

Guidance Document Regarding Principles to Guide the Development and Review of Performance Incentive Mechanisms on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4943

2020

Rhode Island Division of Public Utilities - Least Cost Procurement Standards
Docket No. 5015

2020

National Grid Electric Infrastructure, Safety and Reliability Plan FY 2021 on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4995
(WT) (HE)

2020

RIDPUC Ngrid Performance Based Incentive Mechanism and Scorecard Metrics
Docket No. 4770

2020

The Narragansett Electric Company d/b/a National Grid's Electric Proposed Power Sector Transformation (PST) Vision and Implementation Plan on behalf of Rhode Island Division of Public Utilities and Carriers
Docket No. 4780
(WT) (HE)

2021

Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA and The Narragansett Electric Company for Authority to Transfer Ownership of the Narragansett Electric Company to PPL Rhode Island Holdings, LLC and related approvals.
D-21-09
(WT) (HE)

2021

National Grid Standards for Connecting Distributed Generation - Docket # 5077
Docket # 5077

2021

Rhode Island National Grid AMF 2023 Docket No. 5113 - The Narragansett Electric Co. D/b/a National Grid Updated Advanced Metering Functionality Business Case
Docket No. 5113

2021

Rhode Island The Narragansett Electric Co. D/b/a National Grid - Grid Modernization Plan
Docket No. 5114

2022

National Grid Infrastructure, Safety and Reliability Plan FY 2022 on behalf of RIDPUC and Carriers -
Docket # 5098
(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**ACTIVE AND HISTORIC REGULATORY CASES
BY GREGORY L. BOOTH, PE, PLS**

2022

National Grid Infrastructure, Safety and Reliability Plan FY 2023 on behalf of RIDPUC and Carriers -
Docket #5209
(WT) (HE)

2022

Revity Energy LLC Petition for Declaratory Judgment regarding the Rights and Obligations of an
Interconnection
Docket No. 5235
(WT)

2022

Rhode Island Energy Automated Metering Infrastructure 2022 The Narragansett Electric Co. d/b/a Rhode
Island Energy's Advanced Metering Functionality ("AMF") Business Case
Docket No. 22-49-EL

2022

Rhode Island Energy FY2023-2024 Infrastructure Safety and Reliability Plan 2022 Docket No. 22-53-EL
The Narragansett Electric Co. d/b/a Rhode Island Energy - FY 2024 Electric Infrastructure, Safety and
Reliability (ISR) Plan
Docket No. 22-53-EL

2022

Rhode Island Energy Grid Modernization Plan 2024 Docket No. 22-56-EL The Narragansett Electric Co.
d/b/a Rhode Island Energy - Grid Modernization Plan
Docket No. 22-56-EL

2023

Rhode Island Energy Petition for Acceleration Due to DG Project – Tiverton Projects
Docket No. 23-37-EL

2023

Rhode Island Energy Petition for Acceleration Due to DG Project – Weaver Hill Projects
Docket No. 23-38-EL

2023

Rhode Island Energy FY2025 Infrastructure Safety and Reliability Plan 2022 Docket No. 22-53-EL The
Narragansett Electric Co. d/b/a Rhode Island Energy - FY 2024 Electric Infrastructure, Safety and
Reliability (ISR) Plan
Docket No. 23-48-EL

The South Carolina Office of Regulatory Staff

2022

2022 Spectrum Southeast, LLC, Complainant v. York Electric Cooperative, Incorporated, Respondent,
Petition to Determine Just and Reasonable Terms and Conditions for Pole Attachment Agreement
Pursuant to S.C. Code Ann. § 58-9-3030
Case # 2022-188-EC
(WT) (HE)

HE = Hearing
WT = Written Testimony

Gregory L. Booth, PLLC.

**CURRENT & HISTORICAL
CLIENT
LISTS**

Partial List of Historical Utility Clients

<u>Client Name</u>	<u>City</u>	<u>State</u>
4 CES/CEEC	Seymour Johnson AFB	NC
A&N Electric Cooperative	Parksley	VA
ACRES International Corporation	Grand Forks	ND
Adams Electric Cooperative	Gettysburg	PA
Adams Rural Electric Cooperative	West Union	OH
AFL Telecommunications		NC
Alabama Power Company	Birmingham	AL
Alachua, City of	Alachua	FL
Alaska 220 Communications	Anchorage	AK
Albemarle Electric Membership Corporation	Hertford	NC
Allegheny Electric Cooperative	Harrisburg	PA
Alleghany Power Energy	Greensburg	PA
Altahama Electric Membership Corporation	Lyons	GA
Alternative Energy Corporation	RTP	NC
American Public Power Association	Washington	DC
American Telecommunications	Raleigh	NC
Apex Communications, LLC	Wynne	AR
Apex, Town of	Apex	NC
Arkansas Electric Cooperative, Inc.	Little Rock	AR
Arlington County		VA
AT&T	Durham	NC
Ayden, Town of	Ayden	NC
BARC Electric Cooperative	Millboro	VA
Bath Electric, Gas & Water	Bath	NC
Bedford, City of	Bedford	VA
Belhaven, Town of	Belhaven	NC
Bellsouth Mobility DCS	Raleigh	NC
Bennettsville, City of	Bennettsville	SC
Benson, Town of	Benson	NC
Black Creek, Town of	Black Creek	NC
Blountstown, City of	Blountstown	FL
Blue Ridge Electric Cooperative	Pickens	SC
Blue Ridge Electric Membership Corporation	Lenoir	NC
Boulder, City of	Boulder	CO
Brazos Electric Power Cooperative		TX
Brunswick Electric Membership Corporation	Shalotte	NC
Burlington-Northern Railroad	St. Paul	MN
Bushnell, City of	Bushnell	FL
Cape Hatteras Electric Membership Corporation	Buxton	NC
Carolina Power & Light	Raleigh	NC
Carroll Electric Cooperative	Carrollton	OH
Carteret Craven Electric Cooperative	Morehead City	NC
Central Electric Cooperative, Inc.	Parker	PA

<u>Client Name</u>	<u>City</u>	<u>State</u>
Central Electric Membership Corporation	Sanford	NC
Central Georgia Electric Membership Corporation	Jackson	GA
Central Virginia Electric Cooperative	Lovingston	VA
Charter Communications	Holly Ridge	NC
Chattahoochee, City of	Chattahoochee	FL
Choptank Electric Cooperative	Denton	MD
Citizens Electric Corporation	Perryville	MO
Claverack Rural Electric Cooperative	Wysox	PA
Clayton, Town of	Clayton	NC
Clemson University	Clemson	SC
Clewiston, City of	Clewiston	FL
Cobb Electric Membership Corporation	Marietta	GA
Coconut Creek, City of	Coconut Creek	FL
Columbus Water Works	Columbus	GA
Community Electric Cooperative	Windsor	VA
Cooperative Energy	Hattiesburg	MS
Cornelius & Huntersville, NC	Huntersville	NC
Continental Cooperative Services	Harrisburg	PA
Craig-Botetourt Electric Cooperative	New Castle	VA
CP&L Area Cooperatives		NC
Crescent Electric Membership Corporation	Statesville	NC
C&T Enterprises		PA
Dalton Utilities	Dalton	GA
Danvers, Town of	Danvers	MA
Danville, City of	Danville	VA
Davidson Water Cooperative	Welcome	NC
Delaware County Electric Cooperative	Delhi	NY
Delaware Division of Parks & Recreation	Dover	DE
Delaware Electric Cooperative	Greenwood	DE
Depcom Power		
Dover, City of	Dover	DE
Drexel, Town of	Drexel	NC
Duke Energy Progress	Raleigh	NC
East Carolina University	Greenville	NC
East Kentucky Power Cooperative	Winchester	KY
Easton Utilities Commission	Easton	MD
Eden, City of	Eden	NC
Edenton, Town of	Edenton	NC
Edgecombe Martin County Electric Membership Corp.	Tarboro	NC
Electric Cooperatives of SC	Cayce	SC
ElectriCities of NC, Inc.	Raleigh	NC
Elizabeth City	Elizabeth City	NC
EnergyUnited	Statesville	NC
Enfield, Town of	Enfield	NC
Enron Wind Corporation	Tehachapi	CA
Farmville Water and Wastewater Systems	Farmville	NC

<u>Client Name</u>	<u>City</u>	<u>State</u>
Farmville, Town of	Farmville	NC
Flint Energies	Warner Robins	GA
Florida Keys Electric Cooperative Association, Inc.	Tavernier	FL
Florida Municipal Electric Association	Tallahassee	FL
Florida Municipal Power Agency	Orlando	FL
Fort-Bragg – USA	Fort Bragg	NC
Fort Lauderdale, City of	Fort Lauderdale	FL
Fort Meade, City of	Fort Meade	FL
Fort Pierce Utilities	Fort Pierce	FL
Four County Electric Membership Corporation	Burgaw	NC
Fox Islands Electric Cooperative	Vinalhaven	ME
French Broad Electric Membership Corporation	Marshall	NC
Fremont, Town of	Fremont	NC
Georgia Consumers Utility Council	Atlanta	GA
Georgia Power	Union City	GA
Gillette, City of	Gillette	WY
Great River Energy	Maple Grove	MN
Green Cove Springs, City of	Green Cove Springs	FL
Greenville Utilities	Greenville	NC
Greer, SC Comm. Of Public Works	Greer	SC
Greystone Power Corporation	Douglasville	GA
Groton Utilities	Groton	CT
Guernsey-Muskingum Electric Cooperative	New Concord	NH
Habersham Electric Membership Corporation	Clarksville	GA
Halifax Electric Membership Corporation	Enfield	NC
Hamilton, Town of	Hamilton	NC
Hancock-Wood Electric Cooperative	N. Baltimore	OH
Harkers Island Electric Membership Corporation	Harkers Island	NC
Harnett County Wastewater	Lillington	NC
Harron Communications	Frazer	PA
Hart Electric Membership Corporation	Hartwell	GA
Havana, Town of	Havana	FL
Haynes Electric Utility Company	Asheville	NC
Haywood Electric Membership Corporation	Waynesville	NC
Hertford, Town of	Hertford	NC
High Point, City of	High Point	NC
Hobgood, Town of	Hobgood	NC
Hookerton, Town of	Hookerton	NC
Jacksonville Beach, City of	Jacksonville Beach	FL
Jefferson Energy Cooperative	Wrens	GA
Joe Wheeler Electric Membership Corporation	Trinity	AL
Jones-Onslow Electric Membership Corporation	Jacksonville	NC
Jupiter Inlet Colony	Jupiter Inlet	FL
Kenergy	Owensboro	KY
Keys Energy Services	Key West	FL
Kinston, City of	Kinston	NC

<u>Client Name</u>	<u>City</u>	<u>State</u>
LaGrange, Town of	LaGrange	NC
Laurinburg, City of	Laurinburg	NC
Lee County Electric Cooperative		FL
Lenior, City of	Lenoir	NC
Lewes, DE Board of Public Works	Lewes	DE
Lewis County Rural Electric Cooperative	Lewiston	MO
Lexington Utilities	Lexington	NC
Lexington, City of	Lexington	NC
Lookout Windpower, LLC		PA
Louisburg, Town of	Louisburg	NC
Lucama, City of	Lucama	NC
Lumbee River MEC	Red Springs	NC
Lumberton, City of	Lumberton	NC
Lynches River Electric Cooperative	Pageland	SC
Madison, Borough of	Madison	NJ
Maine Public Service Company	Presque Isle	ME
Manassas, City of	Manassas	VA
Martinsville, City of	Martinsville	VA
Mebane, City of	Mebane	NC
Mecklenburg Electric Cooperative	Chase City	VA
Middle Georgia Electric Membership Corporation	Rochelle	GA
Milford, City of	Milford	DE
Mississippi Power	Gulfport	MS
Mitchell Electric Membership Corporation	Camilla	GA
MN Planning/Environmental	St. Paul	MN
Monroe, City of	Monroe	NC
Morganton, City of	Morganton	NC
Municipal Gas Group	Wilson	NC
NASA	Wallops Island	VA
National Rural Telecom Cooperative	Herndon	VA
New Bern, City of	New Bern	NC
Newberry, City of	Newberry	NC
New Enterprise Rural Electric Cooperative	New Enterprise	PA
New Hampshire Electric Cooperative	Plymouth	NH
North Carolina AT&T State University	Greensboro	NC
North Carolina Association of Electric Cooperatives	Raleigh	NC
North Carolina Eastern Municipal Power Agency	Raleigh	NC
North Carolina Electric Membership Corporation	Raleigh	NC
North Carolina League of Municipalities	Raleigh	NC
North Carolina Rural Telecommunications Cooperative	Enfield	NC
North Carolina State University	Raleigh	NC
North Georgia Electric Membership Corporation	Dalton	GA
North Miami, City of	Miami	FL
Northern Neck Electric Cooperative	Warsaw	VA
Northern Virginia Electric Cooperative	Gainesville	VA
Northfield Electric Department	Northfield	VT

<u>Client Name</u>	<u>City</u>	<u>State</u>
Northwest Public Power Association	Vancouver	WA
Northwestern Rural Electric Cooperative Association	Cambridge Springs	PA
NRECA	Arlington	VA
Ohio Rural Electric Cooperative, Inc.	Columbus	OH
Old Dominion Electric Cooperative	Glen Allen	VA
Origis Energy		FL
Ostego Electric Cooperative	Hartwick	NY
Palm Beach, Town of	Palm Beach	FL
Panama City Beach	Panama City	FL
Peace River Electric Cooperative	Wauchula	FL
Pee Dee Electric Cooperative	Darlington	SC
Pee Dee Electric Membership Corporation	Wadesboro	NC
Pennsylvania Rural Electric Association	Harrisburg	PA
Perkasie, Borough of	Perkasie	PA
Piedmont Electric Membership Corporation	Hillsborough	NC
Pineville, Town of	Pineville	NC
Pitt & Greene Electric Membership Corporation	Farmville	NC
Pompano Beach, City of	Pompano Beach	FL
Pope Air Force Base	Pope AFB	NC
Potomac Electric Power Company	Washington	DC
Prince George Electric Cooperative	Waverly	VA
PGEC Enterprise, LLC	Waverly	VA
Progress Energy	Raleigh	NC
PWC of the City of Fayetteville	Fayetteville	NC
Quincy, City of	Quincy	FL
Randolph Electric Membership Corporation	Asheboro	NC
Rappahannock Electric Cooperative	Fredericksburg	VA
REA Energy Cooperative (SW Central)	Indiana	PA
Red Springs, Town of	Red Springs	NC
Roanoke Electric Cooperative	Rich Square	NC
Robersonville, Town of	Robersonville	NC
Rockingham County	Rockingham	NC
Rocky Mount, City of	Rocky Mount	NC
Roxboro, City of	Roxboro	NC
Rutherford Electric Membership Corporation	Forest City	NC
Sacramento Municipal Utility District	Sacramento	CA
Salem, City of	Salem	VA
Sandhills Utility Services, LLC	Red Springs	NC
Santee Cooper	Myrtle Beach	SC
Satilla Rural Electric Membership Corporation	Alma	GA
Sawnee Electric Membership Corporation	Cumming	GA
Scotland Neck, Town of	Scotland Neck	NC
Seaford, Town of	Seaford	DE
SECO Energy	Sumterville	FL
Selma, Town of	Selma	NC
Seneca, City of	Seneca	SC

<u>Client Name</u>	<u>City</u>	<u>State</u>
Seymour-Johnson Air Force Base	Goldsboro	NC
Sharpsburg, Town of	Sharpsburg	NC
Shenandoah Valley Electric Cooperative	Mt. Crawford	VA
SMECO	Hughesville	MD
Smithfield, Town of	Smithfield	NC
Snapping Shoals Electric Membership Corporation	Covington	GA
Somerset Rural Electric Cooperative	Somerset	PA
South Daytona, City of	South Daytona	FL
South Mississippi Electric Power Association	Hattiesburg	MS
South River Electric Membership Corporation	Dunn	NC
Southern Company Services	Atlanta	GA
Southern Maryland Electric Cooperative		MD
Southport, City of	Southport	NC
Southside Electric Cooperative	Crewe	VA
South Carolina Association of Municipal Power Systems	Columbia	SC
Stantonsburg, Town of	Stantonsburg	NC
Starke, City of	Starke	FL
Strata Solar, LLC		
Statesville, City of	Statesville	NC
Steuben Rural Electric Cooperative	Bath	NY
STS Hydro Power Limited	Northbrook	IL
Sullivan County Rural Electric Cooperative	Forksville	PA
Sulphur Springs Valley Electric Membership Corp.	Willcox	AZ
Sumter Electric Cooperative		FL
Surry-Yadkin Electric Membership Corporation	Dobson	NC
Sussex Rural Electric Cooperative	Sussex	NJ
Talquin Electric Cooperative, Inc.	Quincy	FL
Tarboro, Town of	Tarboro	NC
Tarboro Water and Wastewater Systems	Tarboro	NC
Tideland Electric Membership Corporation	Pantego	NC
Time Warner Cable	Newport	NC
Tri-County Electric Membership Corporation	Dudley	NC
Tri-County Electric Membership Corporation	Lafayette	TN
Tri-County Rural Electric Cooperative	Mansfield	PA
TVPPA	Chattanooga	TN
UNC – Asheville	Asheville	NC
UNC – Chapel Hill	Chapel Hill	NC
UNC – Charlotte	Charlotte	NC
UNC – Greensboro	Greensboro	NC
Union Electric Membership Corporation	Monroe	NC
Union Power Cooperative	Monroe	NC
United Electric Cooperative	DuBois	PA
US Generating Company	Bethesda	MD
VA, MD & DE Association of Electric Cooperatives	Glen Allen	VA
Valley Rural Electric Cooperative	Huntington	PA
Vanceburg, City of	Vanceburg	KY

<u>Client Name</u>	<u>City</u>	<u>State</u>
Vero Beach, City of	Vero Beach	FL
Wake County Parks & Recreation	Raleigh	NC
Wake Electric Membership Corporation	Wake Forest	NC
Wake Forest, Town of	Wake Forest	NC
Walstonburg, Town of	Walstonburg	NC
Warren Electric Membership Corporation	Youngsville	PA
Washington Electric Cooperative	E. Montpelier	VT
Washington Electric Membership Corporation	Sandersville	GA
Washington, City of	Washington	NC
Wauchula, City of	Wauchula	FL
Waynesville, Town of	Waynesville	NC
Wellsboro Electric Company	Wellsboro	PA
West Virginia Power Company	Lewisburg	WV
Western Carolina University	Cullowhee	NC
Western North Carolina School for the Deaf	Morganton	NC
Wilmington, City of	Wilmington	NC
Wilson, City of	Wilson	NC
Windsor, Town of	Windsor	NC
Winter Park, City of	Winter Park	FL
Winterville, Town of	Winterville	NC

Partial List of Historical Industrial/Commercial Clients

<u>Client Name</u>	<u>City</u>	<u>State</u>
Action Sensors, Inc.	Wendell	NC
Alcoa Fujikura, Ltd.	Spartanburg	SC
Alliance Development Group, LLC		VA
Atlantic Power Generation	Charlotte	NC
Barnhill Contracting Company	Tarboro	NC
Beckwith Power Systems	North Versailles	PA
Biltmore Dairy Farms, Inc.	Asheville	NC
Black & Decker	Tarboro	NC
Bridgestone/Firestone (BFS)	Wilson	NC
Burroughs Wellcome Company	RTP	NC
CAA Engineers, Inc.		
Calpine Operations Services (Calpine Power)	Houston	TX
Caswell Center	Kinston	NC
Centura Bank	Rocky Mount	NC
Centex Construction	Atlanta	GA
Charter Communications	Surf City	NC
Cherry Hospital – DHR	Goldsboro	NC
Clapp Research Associates	Raleigh	NC
Clark Substations, LLC	Calera	AL
CNA Insurance Companies	Rockville	MD
Cornice Engineering, Inc.	Pagosa Springs	CO
Crawford & Company	Raleigh	NC
Data Comlink, Inc.	Sandersville	GA
Design Dimensions, Inc.	Raleigh	NC
Dolan and Dolan	Newton	NJ
Dupaco	Kinston	NC
Drucker & Falk	Raleigh	NC
E&R Construction	Kinston	NC
East Coast Power & Lighting		
EMC Technologies	Raleigh	NC
Empire of Carolina	Tarboro	NC
Exelon Business Services		
Frigidaire	Kinston	NC
Fontaine Fifth Wheel	Birmingham	AL
Fonville-Morrissey	Raleigh	NC
General Electric	Fairfield	CT
Glenoit Industries	Tarboro	NC
Green Property Advisors, LLC		
Goldsboro, City of	Goldsboro	NC
Cherry Hospital DHR	Goldsboro	NC
Gregory Poole Power Systems	Raleigh	NC
Harris Development Corp.	Wilson	NC
Hesco, Incorporated	Smithfield	NC
High Point Regional Hospital	High Point	NC

<u>Client Name</u>	<u>City</u>	<u>State</u>
Homestead, LLC	Hot Springs	VA
Honeywell	Fort Bragg	NC
Infrastructure Consulting & Engineering		
Jag Management, Inc.	Raleigh	NC
KCI Technologies, Inc.	Raleigh	NC
Kelly Springfield Tire Co.	Fayetteville	NC
Kinston City Hall	Kinston	NC
Larry A. Blattenberger, Inc.	Martinsburg	PA
Lenoir Memorial Hospital	Kinston	NC
Maida Vale, LLC	Raleigh	NC
National Fruit Product Company		VA
National Spinning Co., Inc.	Washington	NC
NC Department of Human Resources	Raleigh	NC
NC Department of Transportation	Raleigh	NC
NC Division of Mental Health	Raleigh	NC
NC Licensing Board – General Contractor	Raleigh	NC
NC School of Deaf	Raleigh	NC
NC State Construction Office	Raleigh	NC
New Hanover County	Wilmington	NC
North Hills PBX	Raleigh	NC
Nucor Steel	Charlotte	NC
Pitt County Memorial Hospital	Greensville	NC
Power Delivery Associates	Smyrna	GA
PS & W Engineering	Cary	NC
Rail-Veyor Global Technologies, Inc.		
Raleigh, City of	Raleigh	NC
Richardson-Wayland Electrical Company		
Rocky Mount City Hall	Rocky Mount	NC
Rural Green Power, LLC		
Sara Lee Corporation	Tarboro	NC
Stanton Barton, LLC		
Still Waters Engineering		
T&D Solutions		
Talisman Partners, Inc. (now Earthtech)	Englewood	CO
Tantalus Systems, Corp.	Burnaby, BC	Canada
Tarboro Elementary School	Tarboro	NC
Tarboro High School	Tarboro	NC
Technical Associates, Inc.		
Teligent, Inc.	Alpharetta	GA
Texfi Industries	Fayetteville	NC
The West Co.	Kinston	NC
Transco	Charlottesville	VA
US Postal Services (GSA)	Raleigh	NC
Utility Engineering Services	Jackson	TN
Volvo Data North America	Greensboro	NC
West Company	Kinston	NC

<u>Client Name</u>	<u>City</u>	<u>State</u>
Williams Energy Group	Tulsa	OK
Zenith Controls, Inc.	Chicago	IL

List of Historical Law Firm Clients

Law Firms	Firm Name	Address - City	Address- State
Abrams & Abrams, P.A., Raleigh, NC	Abrams & Abrams, P.A.	Raleigh	NC
Adams, Hendon, Carson, Crow & Saenger, P.A., ,	Adams, Hendon, Carson, Crow & Saenger, P.A.		
Allegheny Electric Cooperative, Inc., Harrisburg, PA	Allegheny Electric Cooperative, Inc.	Harrisburg	PA
Allen & Gooch, Lafayette, LA	Allen & Gooch	Lafayette	LA
Andrews Law Group, Tampa, FL	Andrews Law Group	Tampa	FL
Arnold & Itkin LLP, Houston, TX	Arnold & Itkin LLP	Houston	TX
Bailey & Dixon LLP, Raleigh, NC	Bailey & Dixon LLP	Raleigh	NC
Baker & Abraham, PC, Boston, MA	Baker & Abraham, PC	Boston	MA
Baker Law Firm, PA, Wilmington, NC	Baker Law Firm, PA	Wilmington	NC
Baker, Jenkins, Jones & Daly PA, Ahoskie, NC	Baker, Jenkins, Jones & Daly PA	Ahoskie	NC
Baker, Jenkins, Jones, Murray, Askew & Carter, PA, ,	Baker, Jenkins, Jones, Murray, Askew & Carter, PA		
Balch & Bingham LLP, Birmingham, AL	Balch & Bingham LLP	Birmingham	AL
Barnes Law Firm, LLC, Kansas City, MO	Barnes Law Firm, LLC	Kansas City	MO
Barr, Murman, Tonelli, Slother & Sleet, Tampa, FL	Barr, Murman, Tonelli, Slother & Sleet	Tampa	FL
Bartimus, Frickleton, Robertson & Goza, P.C., Leawood, KS	Bartimus, Frickleton, Robertson & Goza, P.C.	Leawood	KS
Battle, Winslow, Scott & Wiley, P.A., Rocky Mount, NC	Battle, Winslow, Scott & Wiley, P.A.	Rocky Mount	NC
Beasley Allen, Montgomery, AL	Beasley Allen	Montgomery	AL
Beaver, Holt, Richardson, Sternlicht, Burge & Glazier, PA, Fayetteville, NC	Beaver, Holt, Richardson, Sternlicht, Burge & Glazier, PA	Fayetteville	NC
Berkley Net Underwriters, LLC, Woodbridge, VA	Berkley Net Underwriters, LLC	Woodbridge	VA
Berman & Simmons, Lewiston, ME	Berman & Simmons	Lewiston	ME

Lookup to Law Firms	Firm Name	Address - City	Address - State
Berman Sobin Gross Feldman & Darby, LLP, Gaithersburg, MD	Berman Sobin Gross Feldman & Darby, LLP	Gaithersburg	MD
Beskind and Rudolph, P.A., Chapel Hill, NC	Beskind and Rudolph, P.A.	Chapel Hill	NC
Bordas, Bordas & Jividen, Wheeling, WV	Bordas, Bordas & Jividen	Wheeling	WV
Brault Palmer Steinhilver & Robbins LLP, Fairfax, VA	Brault Palmer Steinhilver & Robbins LLP	Fairfax	VA
Breit Drescher Imprevento & Walker, Virginia Beach, VA	Breit Drescher Imprevento & Walker	Virginia Beach	VA
Bretz & Young, L.L.C, Hutchinson, KS	Bretz & Young, L.L.C	Hutchinson	KS
Brian G. Miller Co.,L.P.A., Columbus, OH	Brian G. Miller Co.,L.P.A.	Columbus	OH
Britcher, Leone and Roth, LLC, Glen Rock, NJ	Britcher, Leone and Roth, LLC	Glen Rock	NJ
Brown, Crump, Vanore & Tierney, LLP, Raleigh, NC	Brown, Crump, Vanore & Tierney, LLP	Raleigh	NC
Brunswick Electric Membership Corporation, Supply, NC	Brunswick Electric Membership Corporation	Supply	NC
Buck, Danaher, Ryan & McGlenn, Elmira, NY	Buck, Danaher, Ryan & McGlenn	Elmira	NY
Campbell, Campbell Edwards & Conroy, Boston, MA	Campbell, Campbell Edwards & Conroy	Boston	MA
Carey Leisure & Neal, Clearwater, FL	Carey Leisure & Neal	Clearwater	FL
Carolina Adjusters, ,	Carolina Adjusters		
Carolina Power & Light Company, Raleigh, NC	Carolina Power & Light Company	Raleigh	NC
Chappell, Smith and Arden, Columbia, SC	Chappell, Smith and Arden	Columbia	SC
City of Monroe, ,	City of Monroe		
Civille & Tang, PLLC, Hagatna, GU	Civille & Tang, PLLC	Hagatna	GU
Cohen, Placitella & Roth, Philadelphia, PA	Cohen, Placitella & Roth	Philadelphia	PA
Coleman, Bernholz, Dickerson, Bernholz, Gledhill, Hargrave, Chapel Hill, NC	Coleman, Bernholz, Dickerson, Bernholz, Gledhill, Hargrave	Chapel Hill	NC
Colombo Law, Columbus, OH	Colombo Law	Columbus	OH

Lookup to Law Firms	Firm Name	Address - City	Address - State
Connecticut Office of Consumer Counsel (OCC), New Britain, CT	Connecticut Office of Consumer Counsel (OCC)	New Britain	CT
Copeland, Cook, Taylor & Bush, PA, Ridgeland, MS	Copeland, Cook, Taylor & Bush, PA	Ridgeland	MS
Couch & Taibi, Durham, NC	Couch & Taibi	Durham	NC
Cozen O' Connor, Charlotte, NC	Cozen O' Connor	Charlotte	NC
Cranfill Sumner & Hartzog LLP, Charlotte, NC	Cranfill Sumner & Hartzog LLP	Charlotte	NC
Cranfill Sumner & Hartzog, LLP, Raleigh, NC	Cranfill Sumner & Hartzog, LLP	Raleigh	NC
Crisp, Davis, Page & Currin, LLP, Raleigh, NC	Crisp, Davis, Page & Currin, LLP	Raleigh	NC
Crisp, Page & Currin, LLP, Raleigh, NC	Crisp, Page & Currin, LLP	Raleigh	NC
Daniel & Daniel, ,	Daniel & Daniel		
Daniel, Medley & Kirby, P.C., Danville, VA	Daniel, Medley & Kirby, P.C.	Danville	VA
David A. Vukelja, PA, Ormond Beach, FL	David A. Vukelja, PA	Ormond Beach	FL
Davis & Lumsden PA, Beaufort, NC	Davis & Lumsden PA	Beaufort	NC
Dean Law Firm, Houston, TX	Dean Law Firm	Houston	TX
Delaware County Electric Cooperative, Inc., ,	Delaware County Electric Cooperative, Inc.		
Delaware Division of the Public Advocate, Dover, DE	Delaware Division of the Public Advocate	Dover	DE
Delaware Electric Cooperative, Inc., Greenwood, DE	Delaware Electric Cooperative, Inc.	Greenwood	DE
DeVore & Acton, PA, Charlotte, NC	DeVore & Acton, PA	Charlotte	NC
Devore, Acton & Stafford, PA, Charlotte, NC	Devore, Acton & Stafford, PA	Charlotte	NC
Dickie, McCamey & Chilcote, P.C., Charlotte, NC	Dickie, McCamey & Chilcote, P.C.	Charlotte	NC
Dollar Burns & Becker, Kansas City, MO	Dollar Burns & Becker	Kansas City	MO
Dugan, Brinkmann, Maginnis & Pace, Philadelphia, PA	Dugan, Brinkmann, Maginnis & Pace	Philadelphia	PA
Duke Energy Corporation, Charlotte, NC	Duke Energy Corporation	Charlotte	NC

Lookup to Law Firms	Firm Name	Address - City	Address - State
Duke Energy Progress, Raleigh, NC	Duke Energy Progress	Raleigh	NC
Dull & Heaney, LLC, Clinton, MO	Dull & Heaney, LLC	Clinton	MO
Edelman & Thompson, LLC, Kansas City, MO	Edelman & Thompson, LLC	Kansas City	MO
Edmonds Cole Law Firm, PC, Oklahoma City, OK	Edmonds Cole Law Firm, PC	Oklahoma City	OK
Edward M. Ricci Law Firm, West Palm Beach, FL	Edward M. Ricci Law Firm	West Palm Beach	FL
Edwards, Kirby & Holt, LLP, Raleigh, NC	Edwards, Kirby & Holt, LLP	Raleigh	NC
Electric Insurance Company, Beverly, MA	Electric Insurance Company	Beverly	MA
EnergyUnited, ,	EnergyUnited		
Eppes & Plumblee, P.A., Greenville, SC	Eppes & Plumblee, P.A.	Greenville	SC
Ervin & Gates, Charlotte, NC	Ervin & Gates	Charlotte	NC
Faulkner & Boyce, PC, New London, CT	Faulkner & Boyce, PC	New London	CT
Federal Reserve Bank of Richmond, VA, ,	Federal Reserve Bank of Richmond, VA		
Federated Rural Electric Insurance Corporation, ,	Federated Rural Electric Insurance Corporation		
Federated Rural Insurance Corporation, ,	Federated Rural Insurance Corporation		
Ferderigos & Lambe, Winter Park, FL	Ferderigos & Lambe	Winter Park	FL
Fields Law Firm, Kansas City, MO	Fields Law Firm	Kansas City	MO
Fiore, Krause, Crogan & Lopez, Owings Mills, MD	Fiore, Krause, Crogan & Lopez	Owings Mills	MD
Forensic Engineering, Inc., ,	Forensic Engineering, Inc.		
Frank M. Wilson, PC, ,	Frank M. Wilson, PC		
Freeman & Freeman, PC, Rockville, MD	Freeman & Freeman, PC	Rockville	MD
Freidman, Sissman & Heaton, Memphis, TN	Freidman, Sissman & Heaton	Memphis	TN
French Broad EMC, Marshall, NC	French Broad EMC	Marshall	NC

Lookup to Law Firms	Firm Name	Address - City	Address - State
Friday & Cox, LLC, Pittsburgh, PA	Friday & Cox, LLC	Pittsburgh	PA
Friday, Eldredge & Clark, Little Rock, AZ	Friday, Eldredge & Clark	Little Rock	AZ
Frohlich, Gordon & Beason Law Firm, Port Charles, FL	Frohlich, Gordon & Beason Law Firm	Port Charles	FL
Gallivan, White & Boyd, P.A., Greenville, SC	Gallivan, White & Boyd, P.A.	Greenville	SC
Gary Harris Attorneys At Law, Orlando, FL	Gary Harris Attorneys At Law	Orlando	FL
GlascocK, Gardy & Salvage, Suffolk, VA	GlascocK, Gardy & Salvage	Suffolk	VA
Godin Geretty & Puntillo, Kenosha, WI	Godin Geretty & Puntillo	Kenosha	WI
Godwin, Morris, Laurenzi & Bloomfield, Memphis, TN	Godwin, Morris, Laurenzi & Bloomfield	Memphis	TN
Gough, Skipworth, Summers, Eves & Travett, Rochester, NY	Gough, Skipworth, Summers, Eves & Travett	Rochester	NY
Granger, Santry, Mitchell & Heath PA, Tallahassee, FL	Granger, Santry, Mitchell & Heath PA	Tallahassee	FL
Grossman, Roth & Partridge, Sarasota, FL	Grossman, Roth & Partridge	Sarasota	FL
Habush, Habush and Rottier, Milwaukee, WI	Habush, Habush and Rottier	Milwaukee	WI
Habush, Habush, Davis & Rottier, SC, Rhinelander, WI	Habush, Habush, Davis & Rottier, SC	Rhinelander	WI
Halifax Electric Membership Corporation, Enfield, NC	Halifax Electric Membership Corporation	Enfield	NC
Hall & Bates, San Antonia, TX	Hall & Bates	San Antonia	TX
Hall Ansley, P.C., Springfield, MO	Hall Ansley, P.C.	Springfield	MO
Harrison, White, Smtih & Coggins, P.C., Spartanburg, SC	Harrison, White, Smtih & Coggins, P.C.	Spartanburg	SC
Haynes Electric Utility Company, ,	Haynes Electric Utility Company		
Haynsworth Sinkler Boyd, P.A., Greenville, SC	Haynsworth Sinkler Boyd, P.A.	Greenville	SC
Hedrick & Blackwell, LLP, Wilmington, NC	Hedrick & Blackwell, LLP	Wilmington	NC
Hedrick, Eatman, Gardner & Kincheloe, ,	Hedrick, Eatman, Gardner & Kincheloe		

Lookup to Law Firms	Firm Name	Address - City	Address - State
Herzfeld & Rubin, P.C., New York, NY	Herzfeld & Rubin, P.C.	New York	NY
Hogue, Hill, Jones, Nash & Lynch, Wilmington, NC	Hogue, Hill, Jones, Nash & Lynch	Wilmington	NC
Holden & Carr, Tulsa, OK	Holden & Carr	Tulsa	OK
Holt Sherlin LLP, ,	Holt Sherlin LLP		
Hoover Penrod, PLC, Harrisonburg, Virginia	Hoover Penrod, PLC	Harrisonburg	Virginia
Hutchens Law Firm, Fayetteville, NC	Hutchens Law Firm	Fayetteville	NC
Hux, Livermon & Armstrong, LLP, Enfield, NC	Hux, Livermon & Armstrong, LLP	Enfield	NC
Irigonegaray & Associates, Topeka, KS	Irigonegaray & Associates	Topeka	KS
Jacquart & Lowe, S.C., Milwaukee, WI	Jacquart & Lowe, S.C.	Milwaukee	WI
James McElroy & Diehl, P.A., Charlotte, NC	James McElroy & Diehl, P.A.	Charlotte	NC
Jensen, McGrath, & Podgorny, PA, Research Triangle Park, NC	Jensen, McGrath, & Podgorny, PA	Research Triangle Park	NC
Jernigan Law Firm, Raleigh, NC	Jernigan Law Firm	Raleigh	NC
Joel H. Holt, Esq., PC, Christiansted, VI	Joel H. Holt, Esq., PC	Christiansted	VI
John Gehlhausen Attorney at Law, Lamar, CO	John Gehlhausen Attorney at Law	Lamar	CO
Johnson & Lambeth, Wilmington, NC	Johnson & Lambeth	Wilmington	NC
Johnson & Ward, Atlanta, GA	Johnson & Ward	Atlanta	GA
Jose G. Rodriguez, PA, West Palm Beach, FL	Jose G. Rodriguez, PA	West Palm Beach	FL
Kaplan, Gilpin & Associates, LLC, Charlotte, NC	Kaplan, Gilpin & Associates, LLC	Charlotte	NC
Kassel Law, Columbia, SC	Kassel Law	Columbia	SC
Katzman, Wasserman, Bennardini & Rubinstein, PA, Plantation, FL	Katzman, Wasserman, Bennardini & Rubinstein, PA	Plantation	FL
Kaufman & Canoles, Richmond, VA	Kaufman & Canoles	Richmond	VA
Kenneth J. Allen Law Group, Valparaiso, IN	Kenneth J. Allen Law Group	Valparaiso	IN

Lookup to Law Firms	Firm Name	Address - City	Address - State
Key & Tatel, Roanoke, VA	Key & Tatel	Roanoke	VA
Kilpatrick Stockton LLP, Raleigh, NC	Kilpatrick Stockton LLP	Raleigh	NC
Kline & Specter, PC, Philadelphia, PA	Kline & Specter, PC	Philadelphia	PA
Koskoff Koskoff & Beider, PC, Bridgeport, CT	Koskoff Koskoff & Beider, PC	Bridgeport	CT
Kullman, Klein & Dioneda, PC, Clayton, MO	Kullman, Klein & Dioneda, PC	Clayton	MO
La Capra Associates, Inc., Boston, MA	La Capra Associates, Inc.	Boston	MA
Langdon & Emison, Lexington, MO	Langdon & Emison	Lexington	MO
Langdon & Emison, N. Kansas City, MO	Langdon & Emison	N. Kansas City	MO
Langdon and Emison, Lexington, MO	Langdon and Emison	Lexington	MO
Lanzotti & Rau LLC, Cape Girardeau, MO	Lanzotti & Rau LLC	Cape Girardeau	MO
Larry Leake Attorney At Law, Asheville, NC	Larry Leake Attorney At Law	Asheville	NC
Law Office of Robert Stranick, Media, PA	Law Office of Robert Stranick	Media	PA
Law Offices of Jeffrey G. Scott, PLLC, Charlotte, NC	Law Offices of Jeffrey G. Scott, PLLC	Charlotte	NC
Law Offices of Peter A. Juras, Jr., Overland Park, KS	Law Offices of Peter A. Juras, Jr.	Overland Park	KS
Law Offices of Rohn and Carpenter, LLC, Christiansted, VI	Law Offices of Rohn and Carpenter, LLC	Christiansted	VI
Law Offices of William M. Jeter, PLLC, Memphis, TN	Law Offices of William M. Jeter, PLLC	Memphis	TN
LeClair Ryan, Glen Allen, VI	LeClair Ryan	Glen Allen	VI
LeClairRyan, Newark, NJ	LeClairRyan	Newark	NJ
LeClairRyan, Washington, DC	LeClairRyan	Washington	DC
Levinson Axelrod, P.A., Edison, NJ	Levinson Axelrod, P.A.	Edison	NJ
Lewis Kappes, Indianapolis, IN	Lewis Kappes	Indianapolis	IN
Lichtenstein Fishwick PPL, Roanoke, VA	Lichtenstein Fishwick PPL	Roanoke	VA

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Lucas, Bryant & Denning, PA, ,	Lucas, Bryant & Denning, PA		
Lytal, Reiter, Ivey & Fronrath, West Palm Beach, FL	Lytal, Reiter, Ivey & Fronrath	West Palm Beach	FL
Lytal, Reiter, Smith, Ivey & Fronrath, LLP, West Palm Beach, FL	Lytal, Reiter, Smith, Ivey & Fronrath, LLP	West Palm Beach	FL
MA Attorney General's Office, Boston, MA	MA Attorney General's Office	Boston	MA
Maher & Associates, Towson, MD	Maher & Associates	Towson	MD
Margolis and Velasco, Chicago, IL	Margolis and Velasco	Chicago	IL
Mark C. Tanenbaum, PA, ,	Mark C. Tanenbaum, PA		
Marshall, Williams, Gorham and Brawley, Wilmington, NC	Marshall, Williams, Gorham and Brawley	Wilmington	NC
Martin and Jones, PLLC, Raleigh, NC	Martin and Jones, PLLC	Raleigh	NC
Martin, Jean & Jackson, Ponca City, OK	Martin, Jean & Jackson	Ponca City	OK
Massachusetts Attorney General's Office, Boston, MA	Massachusetts Attorney General's Office	Boston	MA
Maupin Taylor, PA, Raleigh, NC	Maupin Taylor, PA	Raleigh	NC
McAngus Goudelock & Courie, LLC, Raleigh, NC	McAngus Goudelock & Courie, LLC	Raleigh	NC
McCandlish Holton Morris, Richmond, VA	McCandlish Holton Morris	Richmond	VA
McCoy, Weaver, Wiggins, Cleveland & Raper PLLC, ,	McCoy, Weaver, Wiggins, Cleveland & Raper PLLC		
McDonald Toole Wiggins, P.A., Orlando, FL	McDonald Toole Wiggins, P.A.	Orlando	FL
McGougan, Wright, Worley, Harper & Bullard, LLP, Tabor City, NC	McGougan, Wright, Worley, Harper & Bullard, LLP	Tabor City	NC
McGuire Woods, LLP, Richmond, VA	McGuire Woods, LLP	Richmond	VA
McNees Wallace & Nurick LLC, Harrisburg, PA	McNees Wallace & Nurick LLC	Harrisburg	PA
Michael F. Amezaga, P.A., West Palm Beach, FL	Michael F. Amezaga, P.A.	West Palm Beach	FL
Michie Hamlett Lowry Rasmussen & Tweel PLLC, Charlottesville, VA	Michie Hamlett Lowry Rasmussen & Tweel PLLC	Charlottesville	VA

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Miles & Stockbridge, PC, Baltimore, MD	Miles & Stockbridge, PC	Baltimore	MD
Montgomery & Larson, LLP, West Palm Beach, FL	Montgomery & Larson, LLP	West Palm Beach	FL
Moore & Van Allen, PLLC, Durham, NC	Moore & Van Allen, PLLC	Durham	NC
Morris & Morris, ,	Morris & Morris		
Morton and Gettys, Rock Hill, SC	Morton and Gettys	Rock Hill	SC
Narron, O'Hale, Whittington & Woodruff PA, ,	Narron, O'Hale, Whittington & Woodruff PA		
National Benefits America, Inc., ,	National Benefits America, Inc.		
Nationwide Insurance, ,	Nationwide Insurance		
Nelson, Mullins, Riley & Scarborough LLP, Raleigh, NC	Nelson, Mullins, Riley & Scarborough LLP	Raleigh	NC
New Jersey Division of Rate Counsel, Trenton, NJ	New Jersey Division of Rate Counsel	Trenton	NJ
Nexsen Pruet, Greensboro, NC	Nexsen Pruet	Greensboro	NC
North Carolina League of Municipalities, Raleigh, NC	North Carolina League of Municipalities	Raleigh	NC
Northern Virginia Electric Cooperative (NOVEC), Gainesville, VA	Northern Virginia Electric Cooperative (NOVEC)	Gainesville	VA
Odem & Groves PC, Charlotte, NC	Odem & Groves PC	Charlotte	NC
Offices of David B. Mishael, PA, Miami, FL	Offices of David B. Mishael, PA	Miami	FL
Offices of Ronald C. Jessamy, PLLC, Washington, DC	Offices of Ronald C. Jessamy, PLLC	Washington	DC
O'Malley & Langan, PC, Pittston, PA	O'Malley & Langan, PC	Pittston	PA
Orr & Reno, P.A., Concord, NH	Orr & Reno, P.A.	Concord	NH
Panter, Panter & Sampedro, Miami, FL	Panter, Panter & Sampedro	Miami	FL
Parker Poe, Raleigh, NC	Parker Poe	Raleigh	NC
Parker Poe Law Firm, Spartanburg, SC	Parker Poe Law Firm	Spartanburg	SC
Parker, Poe, Adams & Bernstein, LLP, Charlotte, NC	Parker, Poe, Adams & Bernstein, LLP	Charlotte	NC

Lookup to Law Firms	Firm Name	Address - City	Address - State
Parr Richey Obremskey Frandsen & Patterson, Lebanon, IN	Parr Richey Obremskey Frandsen & Patterson	Lebanon	IN
Patla, Staus, Robinson & Moore, P.A., Asheville, NC	Patla, Staus, Robinson & Moore, P.A.	Asheville	NC
Patrick C. Fire Law Offices, Boardman, OH	Patrick C. Fire Law Offices	Boardman	OH
Patrick H. Dekle, P.A., Tampa, FL	Patrick H. Dekle, P.A.	Tampa	FL
Patterson Dilthey, LLP, Raleigh, NC	Patterson Dilthey, LLP	Raleigh	NC
Patterson, Dilthey, Clay & Bryson, Raleigh, NC	Patterson, Dilthey, Clay & Bryson	Raleigh	NC
Patterson, Dilthey, Clay, Bryson & Anderson, LLP, Raleigh, NC	Patterson, Dilthey, Clay, Bryson & Anderson, LLP	Raleigh	NC
Patterson, Dilthey, Clay, Cranfill, Sumner & Hartzog, Raleigh, NC	Patterson, Dilthey, Clay, Cranfill, Sumner & Hartzog	Raleigh	NC
Patterson, Harkavy & Lawrence LLP, Raleigh, NC	Patterson, Harkavy & Lawrence LLP	Raleigh	NC
Penry Riemann PLLC, Raleigh, NC	Penry Riemann PLLC	Raleigh	NC
PEPCO, Washington, DC	PEPCO	Washington	DC
Peter Perlman Law Offices PSC, Lexington, KY	Peter Perlman Law Offices PSC	Lexington	KY
Peters, Murdaugh, Parker, Eltzroth & Detrick, Hampton, SC	Peters, Murdaugh, Parker, Eltzroth & Detrick	Hampton	SC
Pitt & Green Electric Membership Corporation, Farmville, NC	Pitt & Green Electric Membership Corporation	Farmville	NC
Pittman, Germany, Roberts & Welsh LLP, Jackson, MS	Pittman, Germany, Roberts & Welsh LLP	Jackson	MS
Podgorny Law, PA, Durham, NC	Podgorny Law, PA	Durham	NC
Pope & Tart, Dunn, NC	Pope & Tart	Dunn	NC
Poyner & Spruill, LLP, ,	Poyner & Spruill, LLP		
Pulley, Watson, King & Lischer, P.A., Durham, NC	Pulley, Watson, King & Lischer, P.A.	Durham	NC
Ragsdale Liggett, Raleigh, NC	Ragsdale Liggett	Raleigh	NC
Rainwater Holt & Sexton, PA, ,	Rainwater Holt & Sexton, PA		
Randles, Mata & Brown, LLC, Kansas City, MO	Randles, Mata & Brown, LLC	Kansas City	MO

Lookup to Law Firms	Firm Name	Address - City	Address - State
Reid, Lewis Deese & Nance, ,	Reid, Lewis Deese & Nance		
Rhode Island Attorney General, ,	Rhode Island Attorney General		
Rhode Island Division of Public Utilities, Warwick, RI	Rhode Island Division of Public Utilities	Warwick	RI
Rhode Island Division of Public Utilities & Carriers, Warwick, RI	Rhode Island Division of Public Utilities & Carriers	Warwick	RI
Ricci & Leopold, P.A., Palm Beach Gardens, FL	Ricci & Leopold, P.A.	Palm Beach Gardens	FL
Richardson, Patrick, Westbrook & Brickman, LLC, Barnwell, SC	Richardson, Patrick, Westbrook & Brickman, LLC	Barnwell	SC
Robert D. Douglass Attorney at Law, Indiana, PA	Robert D. Douglass Attorney at Law	Indiana	PA
Rogers Mastrangelo Carvalho & Mitchell, Las Vegas, NV	Rogers Mastrangelo Carvalho & Mitchell	Las Vegas	NV
Romano, Eriksen, Cronin & Mullins, Lake Worth, FL	Romano, Eriksen, Cronin & Mullins	Lake Worth	FL
Rountree Losee, LLP, Wilmington, NC	Rountree Losee, LLP	Wilmington	NC
Rourke and Blumenthal, Columbus, OH	Rourke and Blumenthal	Columbus	OH
Sandler & Marchesini, PC, Philadelphia, PA	Sandler & Marchesini, PC	Philadelphia	PA
Sanford Thompson, PLLC, Raleigh, NC	Sanford Thompson, PLLC	Raleigh	NC
Saperston & Day, PC, Buffalo, NY	Saperston & Day, PC	Buffalo	NY
Sasscer, Clagett & Bucher, Upper Marlboro, MD	Sasscer, Clagett & Bucher	Upper Marlboro	MD
Scherffius, Ballard, Still & Ayers, LLP, Atlanta, GA	Scherffius, Ballard, Still & Ayers, LLP	Atlanta	GA
Schoen Walton Teleken & Foster, LLC, Edwardsville, IL	Schoen Walton Teleken & Foster, LLC	Edwardsville	IL
Schultz Law, LLC, Conshohocken, PA	Schultz Law, LLC	Conshohocken	PA
Schwed, Adams, Sobel & McGinley, P.A., Palm Beach Gardens, FL	Schwed, Adams, Sobel & McGinley, P.A.	Palm Beach Gardens	FL
Scott T. Kimmel Attorney at Law, Lighthouse Point, FL	Scott T. Kimmel Attorney at Law	Lighthouse Point	FL

Lookup to Law Firms	Firm Name	Address - City	Address - State
Searcy, Denney, Scarola, Barnhart & Shipley, PA, W. Palm Beach, FL	Searcy, Denney, Scarola, Barnhart & Shipley, PA	W. Palm Beach	FL
Sedgwick Claims Management Services, Inc, Louisville, KY	Sedgwick Claims Management Services, Inc	Louisville	KY
Shapiro, Cooper, Lewis & Appleton, PC, Virginia Beach, VA	Shapiro, Cooper, Lewis & Appleton, PC	Virginia Beach	VA
Shollenberger Januzzi & Wolfe, LLP, Enola, PA	Shollenberger Januzzi & Wolfe, LLP	Enola	PA
Silverstein, Silverstein & Silverstein, PA, Aventura, FL	Silverstein, Silverstein & Silverstein, PA	Aventura	FL
Simon & Bocksch, Miami, FL	Simon & Bocksch	Miami	FL
Simon Passanante, PC, St. Louis, MO	Simon Passanante, PC	St. Louis	MO
Simpson Boyd & Powers, Decatur, TX	Simpson Boyd & Powers	Decatur	TX
Smith & Duggan LLC, Lincoln, MA	Smith & Duggan LLC	Lincoln	MA
Smith & Duggan, LLP, Boston, MA	Smith & Duggan, LLP	Boston	MA
Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, LLP, Raleigh, NC	Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, LLP	Raleigh	NC
Smith, Helms, Mulliss & Moore, LLP, ,	Smith, Helms, Mulliss & Moore, LLP		
Smith, Patterson, Follin, Curtis, James & Haravey, Greensboro, NC	Smith, Patterson, Follin, Curtis, James & Haravey	Greensboro	NC
Sommer, Olk, Schroeder & Payant, LLP, Rhienlander, WI	Sommer, Olk, Schroeder & Payant, LLP	Rhienlander	WI
Spivey Law Firm, Ft. Myers, FL	Spivey Law Firm	Ft. Myers	FL
St. Paul Fire and Marine Insurance Company, Charlotte, NC	St. Paul Fire and Marine Insurance Company	Charlotte	NC
State of Maine, Department of Public Advocate, Augusta, ME	State of Maine, Department of Public Advocate	Augusta	ME
Stites & Hopkins, Kansas City, MO	Stites & Hopkins	Kansas City	MO
Stoner, Bowers, Gray & McDonald, P.A., ,	Stoner, Bowers, Gray & McDonald, P.A.		

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Strassburger McKenna Gutnick & Gefsky, Pittsburgh, PA	Strassburger McKenna Gutnick & Gefsky	Pittsburgh	PA
Strong Garner Bauer, PC, Springfield, MO	Strong Garner Bauer, PC	Springfield	MO
Sumrel ,Sugg, Carmichael, Hicks & Hart, New Bern, NC	Sumrel ,Sugg, Carmichael, Hicks & Hart	New Bern	NC
Taraska, Grower, Unger & Ketcham, PA, ,	Taraska, Grower, Unger & Ketcham, PA		
Taylor, Day, Grimm, Boyd & Johnson, Jacksonville, FL	Taylor, Day, Grimm, Boyd & Johnson	Jacksonville	FL
The Accurso Law Firm, Kansas City, MO	The Accurso Law Firm	Kansas City	MO
The Becker Law Firm, Cleveland, OH	The Becker Law Firm	Cleveland	OH
The Chandler Law Group, Charlottesville, VA	The Chandler Law Group	Charlottesville	VA
The Daniel Law Group PLLC, Indiana, PA	The Daniel Law Group PLLC	Indiana	PA
The Goss Law Firm, P.C., Kansas City, MO	The Goss Law Firm, P.C.	Kansas City	MO
The Kuhlman Law Firm, LLC, Kansas City, MO	The Kuhlman Law Firm, LLC	Kansas City	MO
The Popham Law Firm, Kansas City, MO	The Popham Law Firm	Kansas City	MO
The Redfearn Law Firm, P.C., Independence, MO	The Redfearn Law Firm, P.C.	Independence	MO
The Simon Law Firm, P.C., St Louis, MO	The Simon Law Firm, P.C.	St Louis	MO
The Wilbur C. Smith, III Law Firm, LLC, Fort Myers, FL	The Wilbur C. Smith, III Law Firm, LLC	Fort Myers	FL
Thompson, Smyth & Cioffi, LLP, Raleigh, NC	Thompson, Smyth & Cioffi, LLP	Raleigh	NC
Throp, Fuller & Slifkin, P.A., Raleigh, NC	Throp, Fuller & Slifkin, P.A.	Raleigh	NC
Timothy D. Welbourne Attorney at Law, ,	Timothy D. Welbourne Attorney at Law		
Town of Hookerton, ,	Town of Hookerton		
Troutman Sanders LLP, Raleigh, NC	Troutman Sanders LLP	Raleigh	NC
Turner & Sweeny, Kansas City, MO	Turner & Sweeny	Kansas City	MO

Lookup to Law Firms	Firm Name	Address - City	Address - State
Twiggs, Abrams, Strickland & Trehy, P.A., Raleigh, NC	Twiggs, Abrams, Strickland & Trehy, P.A.	Raleigh	NC
US General Services Administration, Kansas City, MO	US General Services Administration	Kansas City	MO
Utiliworks Consulting, LLC, Baton Rouge, LA	Utiliworks Consulting, LLC	Baton Rouge	LA
Vandeventer Black LLP, Raleigh, NC	Vandeventer Black LLP	Raleigh	NC
VML Insurance Programs, Richmond, VA	VML Insurance Programs	Richmond	VA
W. Osmond Smith III Attorney at Law, ,	W. Osmond Smith III Attorney at Law		
Walker & Morgan, LLC, Lexington, SC	Walker & Morgan, LLC	Lexington	SC
Walters Bender Strohbehn & Vaughan, PC, Kansas City, MO	Walters Bender Strohbehn & Vaughan, PC	Kansas City	MO
Ward & Smith, PA, Greenville, NC	Ward & Smith, PA	Greenville	NC
Warren & Kallianos, Charlotte, NC	Warren & Kallianos	Charlotte	NC
Warren & McGraw, LLC, Blue Bell, PA	Warren & McGraw, LLC	Blue Bell	PA
Warshafsky, Rotter, Tarnoff & Block, S.C., Milwaukee, WI	Warshafsky, Rotter, Tarnoff & Block, S.C.	Milwaukee	WI
Warshauer Poe & Thornton, PC, Atlanta, GA	Warshauer Poe & Thornton, PC	Atlanta	GA
Whitacker, Mudd, Luke & Wells, LLC, Birmingham, AL	Whitacker, Mudd, Luke & Wells, LLC	Birmingham	AL
Whitesides & Kenny, ,	Whitesides & Kenny		
Wilkins Frohlich, PA, Port Charlotte, FL	Wilkins Frohlich, PA	Port Charlotte	FL
Williams & Connolly LLP, Washington, DC	Williams & Connolly LLP	Washington	DC
Williams Hart Boundas Easterby, LLP, Houston, TX	Williams Hart Boundas Easterby, LLP	Houston	TX
Williamson & Lavecchia LC, Richmond, VA	Williamson & Lavecchia LC	Richmond	VA
Wilson Elser Moskowitz Edelman & Dicker LLP, McClean, VA	Wilson Elser Moskowitz Edelman & Dicker LLP	McClean	VA

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Wilson Elser Moskowitz Edelman & Dicker, LLP, McLean, VA	Wilson Elser Moskowitz Edelman & Dicker, LLP	McLean	VA
Wilson, Frame, Metheney Attorneys & Counselors at Law, Morgantown, WV	Wilson, Frame, Metheney Attorneys & Counselors at Law	Morgantown	WV
Wilson, Garber & Small, Orlando, FL	Wilson, Garber & Small	Orlando	FL
Winner, Wixson & Pernitz, Madison, WI	Winner, Wixson & Pernitz	Madison	WI
Womble Carlyle Sandridge & Rice, Winston-Salem, NC	Womble Carlyle Sandridge & Rice	Winston-Salem	NC
Wyatt Law Firm, San Antonio, TX	Wyatt Law Firm	San Antonio	TX
Yates, McLamb & Weyher, LLP, Raleigh, NC	Yates, McLamb & Weyher, LLP	Raleigh	NC
Young & Adams, Attorneys at Law, Boca Raton, FL	Young & Adams, Attorneys at Law	Boca Raton	FL
Young Moore and Henderson, P.A., Raleigh, NC	Young Moore and Henderson, P.A.	Raleigh	NC
Zurich American Insurance Company, Charlotte, NC	Zurich American Insurance Company	Charlotte	NC
Zurich North America, ,	Zurich North America		