

**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

SURREBUTTAL TESTIMONY OF

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

May 22, 2024

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**Surrebuttal Testimony of
Gregory L. Booth, PE, President
Gregory L. Booth, PLLC**

**On Behalf of Rhode Island Division of Public Utilities and Carriers
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1 **SURREBUTTAL TESTIMONY OF GREGORY L. BOOTH, PE**

2
3 **I. INTRODUCTION**

4 **Q. PLEASE STATE YOUR NAME AND THE BUSINESS ADDRESS OF YOUR**
5 **EMPLOYER.**

6 A. My name is Gregory L. Booth. My company is Gregory L. Booth, PLLC (“Booth, PLLC”),
7 mailing address 14460 Falls of Neuse Road, Suite 149-110, Raleigh, North Carolina 27614.

8 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS MATTER?**

9 A. I am testifying on behalf of the Rhode Island Division of Public Utilities and Carriers
10 (“Division”).

11 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?**

12 A. Yes. My Direct Testimony was filed on April 17, 2024.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY?**

3 A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of the
4 Company witnesses Mr. Constable and Mr. Wiesner filed on May 9, 2024.

5 **Q. DO YOU INTEND TO ADDRESS EACH DISAGREEMENT WITH THESE**
6 **WITNESSES' TESTIMONIES IN DETAIL?**

7 A. No. I stand behind my Direct Testimony and will not rehash every obvious disagreement.
8 I intend to address the areas in which the Company has attempted to introduce confusion
9 or otherwise misrepresented the position of the Division regarding Area Studies, the Long-
10 Range Plan, and past ISR Plans.

1 **III. AREA STUDY, LONG-RANGE PLAN AND ISR PLAN**

2 **Q. THE COMPANY DISCUSSED THE AREA STUDY AND LONG-RANGE PLAN**
3 **NUMEROUS TIMES THROUGHOUT ITS REBUTTAL TESTIMONY**
4 **CONCLUDING ON PAGE 17, LINES 10-11, THAT THE AREA STUDY AND**
5 **LONG-RANGE PLAN PROCESSES HAVE BEEN VETTED. DO YOU CONCUR**
6 **WITH THAT CHARACTERIZATION?**

7 A. I do not. First, the Division and Company are still in the process of discussing the Long-
8 Range Plan that was first submitted by the Company in its FY 2025 ISR Plan filing, and a
9 conclusion has not been reached. Second, the Area Studies, including for Weaver Hill,
10 have always been considered by the Division as stressing the system to create a vision of
11 the future based on highest loading stress and solutions for that worst case. The intent is to
12 avoid incorporation of ISR Plan projects that would result in early obsolescence. Also, the
13 Area Studies provide the Division and Commission a longer view of capital project needs
14 to better balance reliability and contingency needs with ratepayer affordability. The use of
15 the term vetted or any other suggestion of approval of Area Study projects is a
16 mischaracterization of the use of those studies. Many projects in the Area Studies are either
17 not completed as proposed or significantly delayed beyond the dates specified in the Area
18 Study.

19 **Q. ON PAGE 18 OF THE COMPANY'S REBUTTAL TESTIMONY THE COMPANY**
20 **CHARACTERIZES THE WEAVER HILL PROJECT AS BEING REFLECTED IN**
21 **A 5-YEAR PLAN WITHIN THE FY 2023 ISR PLAN WITH THE FIRST SPEND**
22 **ON THE WEAVER HILL PROJECT REFLECTED IN THE FY 2024 ISR PLAN**
23 **FILING, AS IF THAT CONSTITUTED DIVISION ACCEPTANCE AND PUC**

1 **APPROVAL, ABSENT THE FACT THE 34.5 KV DG INTERCONNECTION WAS**
2 **OCCURRING. HOW WOULD YOU RESPOND TO THAT?**

3 A. As I have stated often, the 34.5 kV for the DG interconnection and that it facilitated the
4 Weaver Hill Substation and feeder being advanced by the Company was known. Absent
5 the DG interconnection, the Weaver Hill project is not economically justified. The
6 Division's acceptance of the Weaver Hill project now is premised on Green and Revity
7 requiring the 34.5 kV for their generation interconnection consistent with the Impact
8 Studies, which then advances the Weaver Hill Substation and feeder much sooner than the
9 Division would support otherwise.

10 **Q. ON PAGE 13 OF ITS REBUTTAL TESTIMONY, THE COMPANY STATES YOU**
11 **ARE INCORRECT THAT THE DG PRECIPITATED THE WEAVER HILL**
12 **PROJECT. THE COMPANY GOES ON TO SAY THE CENTRAL RI WEST**
13 **STUDY RECOMMENDATION DOES NOT SERVE THE DG AND SO IT IS**
14 **IMPOSSIBLE FOR THE DG TO BE THE PRECIPITATING REASON FOR THE**
15 **NEW SUBSTATION AND FEEDER. WHAT IS YOUR RESPONSE TO THESE**
16 **CLAIMS?**

17 A. The Company is using smoke and mirrors to convolute the issue and the point of what I
18 am saying. The Central RI West Area Study proposes extending subtransmission (34.5 kV)
19 to be installed for distributed generation interconnection customers to a new substation site
20 on Weaver Hill Road (Petition, Bates page 482). Therefore, the Weaver Hill Substation
21 and the associated new feeder will only exist to serve load if the 34.5 kV line provides
22 service to the substation. The Division would advocate in an ISR Plan process for a
23 substantial deferral of the Weaver Hill Substation and feeder if the 34.5 kV subtransmission

1 line was not being installed to interconnect Green and Revity. The total cost of 34.5 kV
2 subtransmission to a new Weaver Hill Substation and a new feeder are not economically
3 justified upgrades for contingency or reliability purposes at this time. The Weaver Hill
4 project would be deferred but for the DG interconnection requirements for a portion of the
5 34.5 kV line. The Company seems to be obfuscating the fact the 34.5 kV is what would
6 allow a Weaver Hill Substation to be built.

7 **Q. ON PAGE 14 OF THE COMPANY'S REBUTTAL TESTIMONY, THE**
8 **COMPANY IS CRITICAL OF YOUR CONSIDERATION OF ACTUAL PEAK**
9 **LOAD AND THE USE OF RECENT LOAD LEVELS WHICH WERE LOWER.**
10 **THE COMPANY USES AN EXAMPLE OF LOW LOAD LEVELS IN 2014 AND**
11 **2015 WITH A SUBSEQUENT 2016 EXTREMELY HOT SUMMER CAUSING A**
12 **HIGH PEAK. WHAT IS YOUR RESPONSE TO THIS CRITICISM?**

13 A. It is not appropriate to spend tens of millions of dollars to address one short term peak,
14 likely only a few hours, in a 10-year period when the indication is the system load is flat
15 or declining. As the Company has indicated in the past, including in its 2021-2023 System
16 Reliability Procurement Three Year Plan, to advance a wires solution it requires the actual
17 load growth to continue which is driving the future prediction. If the load growth, as in this
18 instance, does not appear to be continuing or does not exist, then deferral of a wires solution
19 is prudent. The planning process and balancing of reliability and contingency load transfer
20 against affordability is always a challenge. What my testimony is stating is simple. If the
21 34.5 kV to serve the DG interconnection was not available, the Division would have
22 strongly objected to the Weaver Hill project advancement in any past ISR Plan or any near-
23 term plan.

1 **Q. WOULD YOU AGREE THAT, ABSENT THE DG INTERCONNECTION, THE**
2 **COMPANY WOULD BE EXPECTED TO COMPLETE A BENEFIT-COST**
3 **ANALYSIS FOLLOWING THE PUC DOCKET 4600A GUIDANCE DOCUMENT?**

4 A. Yes, considering the Weaver Hill Project absent the DG interconnection is a significant
5 cost to enhance reliability and provide for some level of contingency. There needs to be a
6 clear economic justification, which currently does not exist, in order to even begin
7 consideration of such a capital intense project absent the requirement for DG
8 interconnection.

9 **Q. ON PAGE 15 OF THE COMPANY'S REBUTTAL TESTIMONY, THE COMPANY**
10 **ADVANCES THERMAL LOADING, VOLTAGE PERFORMANCE, AND**
11 **RELIABILITY PERFORMANCE ISSUES. WOULD YOU PUT THESE IN**
12 **CONTEXT OF YOUR TESTIMONY AND OPINIONS?**

13 A. These are a singular snapshot of predicted and not actual thermal loading and voltage
14 performance values at the end of an Area Study period. As the Company states on page 17
15 of its Joint Rebuttal Testimony, Area Study solutions evolve over time. However, placing
16 the study in proper context, each study project is viewed with a critical assessment before
17 being advanced in an ISR Plan. This includes reviewing existing load and conditions, since
18 every Area Study project does not advance immediately or even as proposed based on study
19 predictions, which change. The Company provided the Division a number of different
20 study documents with varying load predictions. We received loads ranging from 9,525 kW
21 to 11,061 kW for Coventry 54F1 and 10,087 kW to 12,724 kW for Hopkins Hill 63F6.
22 These are very wide variances on predicted loads, and actual loads do not indicate these
23 levels will be reached any time soon. Therefore, as I continue to state, absent the 34.5 kV

1 being constructed for the DG interconnection, the Division would not support the Weaver
2 Hill project at this time.

3 **Q. ON PAGE 16 OF ITS JOINT REBUTTAL TESTIMONY THE COMPANY**
4 **OFFERS NEW INFORMATION ON THE HOPKINS HILL FEEDER 63F6**
5 **LOADING THAT WAS NOT PREVIOUSLY MADE AVAILABLE. CAN YOU**
6 **SUMMARIZE AND ASSESS THIS NEW INFORMATION?**

7 A. Yes. In response to my observation that the Hopkins Hill 63F6 actual loading is only 88
8 percent today as opposed to the Company's predicted 104 percent, the Company explains
9 that the lower level is due to load switching away from the 63F6 to another area feeder in
10 a temporary fashion to mitigate possible overload. Separately, the Company indicates that
11 new load may be transferred to the 34.5 kV subtransmission line, implying that there are
12 additional needs for effective grounding and voltage regulation that have not previously
13 been discussed. The Company explains these as system operations, stating it is difficult to
14 fully relay and understand the issues through data requests. My overall assessment is that
15 the Company has had ample opportunity to explain material impacts to underlying data
16 that the Division relies upon to evaluate the advancement of capital projects identified in
17 Area Studies. The information should have been clarified in related data request responses
18 but could have been relayed through multiple mechanisms outside of this Petition. These
19 include ISR Plan meetings and data request responses, feeder loading and reliability
20 discussions, Area Study project updates, CYME engineering model submittals, or annual
21 studies performed otherwise. The Division should have all relevant information regardless
22 of the Company's misguided assumption that system operations are difficult to relay and
23 understand. More importantly, the Company elaborates that the 63F6 load transfer was

1 performed in a “temporary fashion” and implies that the switching is unsustainable. It
2 appears that the load transfer switching scheme has sufficiently alleviated the 63F6
3 overload and could continue in the foreseeable future, mitigating the need for a multi-
4 million-dollar substation and feeder. This is an excellent example of leveraging a low-cost
5 solution to defer major capital investments. The Company has offered no details on the
6 frequency and level of load shifting, which could have been only one time over several
7 years for a few hours. There is no explanation of why the solution is unsustainable. The
8 Company also provides insufficient detail on a potential new subtransmission load and how
9 that impacts the overall need for the Weaver Hill Substation and a new feeder. My
10 assessment is that the Company has not put forth any new information that would alter my
11 initial conclusions.

1 **IV. CONCLUSION**

2 **Q. HAS ANY OF THE REBUTTAL TESTIMONY FILED BY THE PETITIONERS**
3 **ALTERED ANY OF YOUR PREVIOUS TESTIMONY OPINIONS?**

4 A. The Petitioners rebuttal testimony has not presented any new positions or materials which
5 would cause me to alter my previous testimony, opinions or recommendations.

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

7 A. Yes.

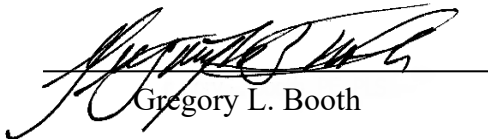
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AFFIDAVIT OF GREGORY L. BOOTH, PE

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 21st day of May, 2024.


Gregory L. Booth