

BEFORE THE
STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: 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

Docket No. D-21-09

**SURREBUTTAL TESTIMONY OF
GREGORY L. BOOTH**

**ON BEHALF OF
THE RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS
ADVOCACY SECTION**

DECEMBER 9, 2021

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**SURREBUTTAL TESTIMONY OF
GREGORY L. BOOTH**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND THE BUSINESS ADDRESS OF YOUR**
3 **EMPLOYER.**

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

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

7 A. I am testifying on behalf of the Advocacy Section of the Rhode Island Division of Public
8 Utilities and Carriers (“Advocacy Section”).

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

10 A. Yes.

11 **II. REVIEW AND ASSESSMENT OF REBUTTAL TESTIMONY**

12 **Q. HAVE YOU REVIEWED THE REBUTTAL TESTIMONY FILED BY**
13 **WITNESSES ON BEHALF OF THE PETITIONERS?**

14 A. Yes, I have reviewed the November 23, 2021, rebuttal testimony and exhibits filed by the
15 witnesses for the Petitioners.

1 **Q. PLEASE SUMMARIZE YOUR ASSESSMENT OF THE REBUTTAL**
2 **TESTIMONY.**

3 A. The rebuttal testimony was presented primarily by consulting witnesses who generally
4 repeat the information contained in the direct testimony filed with the original Petition, and
5 fail to offer or present any substantive rebuttal of the Advocacy Section witnesses'
6 positions. While these witnesses stated opinions and made claims to support the Petition,
7 they did so without any definitive support such as specific examples, studies or analyses or
8 other new materials. Nothing in the rebuttal testimony changes my position or otherwise
9 causes me to alter my original testimony or recommendation. I continue to assert that
10 approval of the Transaction would not be in the public interest, and my recommendation
11 remains that the Petitioners' request for approval be rejected.

12 **III. PURPOSE OF TESTIMONY**

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

14 A. The purpose of my surrebuttal testimony is to address certain areas of the Petitioners'
15 rebuttal testimony. I am limiting my surrebuttal testimony, for the most part, to areas in
16 which I find the rebuttal testimony contradicts my testimony. My surrebuttal testimony
17 does not repeat my original testimony, but rather addresses some of the distinct areas of
18 disagreement and clarifies the record in places the Petitioners' witnesses have either
19 misrepresented my testimony or made statements which lack any specific support and thus
20 should be disregarded in the decision process.

1 **Q. IS THERE NEW INFORMATION PROVIDED IN THE PETITIONERS'**
2 **REBUTTAL TESTIMONY WHICH ACTUALLY FURTHER SUPPORTS YOUR**
3 **ORIGINAL TESTIMONY?**

4 A. Yes. National Grid witnesses Christopher Kelly and Duncan Willey include numerous
5 statements and statistics in their rebuttal testimony that directly support my original
6 testimony and recommendation.

7 First and foremost, only 368 National Grid Service Company employees out of a workforce
8 of 5,100 people will be transitioning to PPL, and of these only 103 will support the electric
9 operations.¹

10 Second, the testimony identifies Alan LaBarre as the individual who will be guiding the
11 long-range planning process and ISR Plan and Area Study process, although he has had
12 very limited direct involvement, particularly over the past several years, in these processes.
13 Mr. LaBarre has not been in the conferences or directly involved with the presentations or
14 leading the process. PPL has not confirmed that the National Grid individuals most visible
15 and directly involved in these processes and ultimate ISR Plan filings will be part of the
16 PPL team.²

17 Third, none of the rebuttal witnesses provided any meaningful new analysis to support their
18 testimony statements even though it is the Petitioners' burden to make its case in favor of
19 approval of the acquisition.

¹ Joint Rebuttal Testimony of Christopher Kelly and Duncan Willey at 17:4 (“Kelly and Willey Rebuttal Test.”).

² National Grid’s response to DIV 11-29 includes a list of employees that support the ISR Plan. National Grid rebuttal testimony footnote 19 on page 27 states that listed employees are essentially transferring over or supporting transition but does not actually identify those expected to become PPL Rhode Island employees. Kelly and Willey Rebuttal Test. at 27:6 n.19.

1 **IV. SURREBUTTAL OF PETITIONERS' REBUTTAL TESTIMONY**

2 **Q. WHAT IS YOUR REACTION TO NATIONAL GRID WITNESSES' REBUTTAL**
3 **OF YOUR VIEWS ON THE ANTICIPATED LENGTH OF THE TRANSITION**
4 **PERIOD?**

5 A. National Grid witnesses Kelly and Willey state on page 28 of their rebuttal testimony that
6 the only support for my position on the transition duration is my Delaware example.³ They
7 are factually incorrect. My testimony discusses Florida and Virginia acquisitions as well
8 as a Colorado acquisition process. All of these acquisitions had transition periods well
9 beyond thirty-six months, rather than the twenty-four month period proposed here. The
10 Delaware example is specifically related to the learning curve duration on a unique ISR
11 Plan process similar to Rhode Island. Petitioners provide no evidence that PPL has
12 experience with the unique ISR Plan process and statutory requirements in place in Rhode
13 Island. My first-hand experience with three utility client acquisitions, all of which required
14 much longer transition periods than proposed here, has not been challenged, and the
15 examples I provided are the only direct examples of transition periods in the record. The
16 Petitioners have not provided any direct examples or references to actual acquisitions with
17 transition periods of twenty-four months or less for significant sized acquisitions.

18 **Q. ARE THERE ANY OTHER DISAGREEMENTS YOU HAVE WITH THE**
19 **NATIONAL GRID REBUTTAL OF YOUR VIEWS ON THE ANTICIPATED**
20 **LENGTH OF THE TRANSITION PERIOD?**

³ Kelly and Willey Rebuttal Test. at 28:6-11.

1 A. Yes. Witnesses Kelly and Willey indicate (on page 28 of their rebuttal testimony) that I
2 have offered no concrete support for a much longer transition duration.⁴ That is inaccurate.
3 My direct experience with three Virginia clients who acquired significant portions of
4 investor-owned utility systems is clear and indisputable concrete support. Additionally, I
5 have witnessed many areas of transition through the Duke Energy acquisition of Progress
6 Energy, two North Carolina utilities, which have taken many years and, in some areas,
7 nearing a decade to complete. The Petitioners have not presented a single example of a
8 similarly-sized acquisition between utilities that are operating in different states that have
9 completed a transition in twenty-four months. My opinion continues to be that it is not
10 possible to complete this transition in twenty-four months. If National Grid is so confident
11 this can be accomplished it should be expected to escrow at least \$200 million to assure it
12 will either make the transition happen in twenty-four months or will remain committed
13 beyond twenty-four months to accomplish the transition to the extent an acquisition is
14 authorized. The National Grid sale of a portion of its system in New Hampshire set just
15 such a precedent for a significantly smaller and less complicated system sale.⁵ If the
16 acquisition is ultimately approved, a condition imposed should be that National Grid
17 escrow \$200 million, which would be subject to forfeiture if National Grid does not remain
18 committed and actively involved through the TSA until all functions are fully transitioned
19 to PPL, regardless of the duration to make a complete transition of all functions.

⁴ *Id.* at 28:3-6.

⁵ Settlement Agreement — Joint Petition for Authority to Transfer Ownership, Division Docket No. DG 11-040 (Apr. 10, 2012).

1 **Q. DO YOU CONCUR WITH NATIONAL GRID WITNESS REBUTTAL**
2 **CONCERNING THE GUIDANCE OF THE LONG-RANGE PLANNING**
3 **PROCESS?**

4 A. National Grid's witnesses Kelly and Willey state (on page 26) that Alan LaBarre will guide
5 the long-rang plan process.⁶ I do not believe that this addresses my concern that PPL will
6 not be prepared to advance the ISR Plan and Area Study, and long-range plan processes. I
7 have been involved as a consultant to the Division for decades, well before and all the way
8 through the ISR Plan process to date. This includes the development of the Area Study and
9 long-range plan processes. My recollection is that Mr. LaBarre played a role in some
10 limited collaboration with the Division in these areas many years ago, but his direct
11 involvement on the past several fiscal years of ISR Plan filings, processes and conferences
12 has been very limited, if not virtually non-existent. And regardless of the level of Mr.
13 LaBarre's personal involvement, the more important point is that PPL has failed to offer
14 any specifics on how it will develop the staff and experience necessary to accomplish the
15 unique ISR Plan and Area Study processes in Rhode Island which are currently supported
16 by 89 National Grid service company employees. These are critical and essential processes
17 for Narragansett's annual capital budget of \$100 million or more, not to mention the
18 statutory requirement. This is a dramatic deficiency in the Petitioners' filing, and they still
19 have not explained how the public interest will not be damaged by this deficiency.

⁶ Kelly and Willey Rebuttal Test. at 26:4-13.

1 **Q. HAVE THE NATIONAL GRID WITNESSES ADEQUATELY EXPLAINED HOW**
2 **SERVICE COMPANY EMPLOYEES WILL TRANSFER TO PPL TO SUPPORT**
3 **EXISTING FUNCTIONS?**

4 A. No. They have not shown that an adequate quantity of service company employees will be
5 transferred to PPL. The National Grid witnesses indicate (on page 17 of their rebuttal
6 testimony)⁷ that of its 5,100 service company employees, only 103 will transfer to the
7 Electric Operations for PPL. Considering 89 company employees support just the ISR Plan
8 and Area Study processes, of which 75 are service company employees, 103 total
9 employees is an insufficient level of support staff to transfer. The relatively low levels of
10 anticipated transfers underscores the tremendous loss of synergies, economies and support
11 that will result from approval of the acquisition. PPL has provided no detailed plan or
12 specifics as to how it can meet the current level of support, which is currently provided by
13 the 5,100 National Grid service company employees for Narragansett. This is another
14 dramatic deficiency in the Petition which will impede the Narragansett's ability to meet its
15 public interest obligations and to provide safe and reliable electric system operations.

16 **Q. ARE THERE SUBJECTS YOU ADDRESSED IN YOUR TESTIMONY THAT THE**
17 **PETITIONERS IGNORE IN THEIR REBUTTAL?**

18 A. Yes. National Grid and PPL have remained relatively silent on the Advanced Metering
19 Functionality ("AMF") and the Grid Modernization Plan ("GMP") implementation delays,
20 and the inability to recover the loss of synergies, economies, and implementation timeline
21 associated with these efforts. In my direct testimony, I point out that National Grid AMF

⁷ *Id.* at 17:4.

1 and GMP filings before the Commission have been stayed pending the PPL Petition
2 resolution. National Grid has explained in detail to the Division and stakeholders the
3 benefits of its AMF advancement in New York, including economic, back office, synergy
4 and implementation timeline benefits. PPL cannot make up for the setback in the AMF
5 implementation time that Rhode Island would have achieved by concurrent implementation
6 with the National Grid New York AMF project, which has already started. This will place
7 PPL at least thirty-six months behind where Rhode Island would have been by taking
8 advantage of the National Grid New York process and related synergies. PPL will have to
9 develop and submit its own AMF and GMP plan filings with the Commission, and go
10 through the regulatory process before it can even begin the engineering, design, material
11 acquisition and implementation. This is another example of why I assert that the transition
12 will take longer than twenty-four months to complete. Additionally, Mr. Jirovec indicates
13 on page 7 of his rebuttal testimony that there is no area they have not developed a transition
14 and integration plan, yet PPL has not indicated that it has developed AMF and GMP plans.⁸

15 **Q. HOW WOULD YOU CHARACTERIZE MR. JIROVEC'S REBUTTAL**
16 **TESTIMONY CRITICISM OF YOUR TESTIMONY?**

17 A. Mr. Jirovec criticized my direct testimony for not providing any detailed analyses. The
18 criticism is unwarranted. First, it is the Petitioners' responsibility to provide the analyses
19 and supporting details. Second, Mr. Jirovec's claims are unsupported. He states on page 8
20 of his testimony that the twenty-four month transition period is aligned with the length of

⁸ Rebuttal Testimony of Todd J. Jirovec at 7:14, 7:17-8:2 ("Jirovec Rebuttal Test.").

1 periods he has observed in other utility transitions.⁹ He provided no utility names, states in
2 which acquisitions transpired, or any other specifics to support his “observations.” I
3 testified based on my personal direct experience with utility clients, rather than a general
4 and unsubstantiated observation. His testimony on this subject should therefore be given
5 no weight.

6 **Q. IS THERE ANOTHER AREA OF MR. JIROVEC’S REBUTTAL WITH WHICH**
7 **YOU DISAGREE?**

8 A. While I disagree with all of Mr. Jirovec’s rebuttal testimony, I would like to discuss one
9 other area in particular. Mr. Jirovec characterizes PPL’s supplement response to Advocacy
10 Section Data Request1-54-1 as being a comprehensive assessment of anticipated
11 Narragansett operating costs under PPL ownership. My testimony pointed to many
12 deficiencies and the incomplete nature of this PPL assessment, which is clearly not a
13 comprehensive evaluation. Some areas of deficiency that Mr. Jirovec ignores include the
14 assessment’s failure to address either the AMF/GMP process under PPL versus National
15 Grid, the enormous synergies and scale economies that will be lost, or the costs to transition
16 construction processes, including materials and design standards. These are just a few of
17 the many areas not addressed in the PPL assessment.

18 **V. RATEPAYER IMPACT OF ASSET/FUNCTION REPLICATION**

19 **Q. YOU RAISED IN YOUR TESTIMONY THE CONCERN THAT PPL WILL INCUR**
20 **ADDITIONAL COSTS TO REPLICATE ASSETS AND FUNCTIONS**

⁹ *Id.* at 8:7-8.

1 **CURRENTLY PROVIDED TO NARRAGANSETT THROUGH NATIONAL**
2 **GRID’S CORPORATE SERVICES MODEL. CAN YOU ELABORATE?**

3 A. Yes. In my direct testimony on pages 18-21, I highlight that PPL’s acquisition of
4 Narragansett would require duplication of systems and functions currently offered through
5 shared services with National Grid.¹⁰ To provide its intended operation model, PPL must
6 invest in these assets and systems at a cost which at the time of the filing was unidentified.
7 Examples are electric and gas control centers, the Supervisory Control and Data
8 Acquisition (“SCADA”) system, call center, material handling and stores and spare
9 materials. I explained that the synergies from National Grid’s shared services model would
10 not only be lost, but that the asset and system replacement costs could be significant, which
11 will increase rates because the functions already paid for by Rhode Island ratepayers will
12 be abandoned and replicated in some other fashion by PPL.

13 **Q. WHAT IS PPL’S RESPONSE TO YOUR CONCERNS?**

14 A. Witness Johnson claims that my concerns are misplaced and specifically states on page 22,
15 lines 15-18 of her testimony that “. . . as discussed earlier in this testimony, PPL and PPL
16 RI will not be seeking recovery of costs incurred solely for the purpose of replacing assets
17 and functionality that Narragansett previously provided for its customers under National
18 Grid USA ownership.”¹¹ In addition, Witness Johnson on page 23, line 1 of her testimony

¹⁰ Direct Testimony of Gregory L. Booth at 18-21 (Nov. 3, 2021) (“Booth Direct Test.”).

¹¹ Rebuttal Testimony of Bethany L. Johnson at 22:15-18 (“Johnson Rebuttal Test.”).

1 implies that PPL expects to provide operational savings such that “. . . PPL’s costs are not
2 expected to result in overall higher costs to operate Narragansett.”¹²

3 **Q. DOES WITNESS JOHNSON’S RESPONSE ALLEVIATE YOUR CONCERNS?**

4 A. No. Witness Johnson has simply continued PPL’s unsupported assertions that costs to
5 operate PPL Rhode Island are not *expected* to be higher than costs if Narragansett remains
6 with National Grid. As highlighted in my direct testimony, PPL has offered only claims,
7 and has made no commitments to that effect. PPL’s rebuttal testimony continues this
8 theme. Additionally, while witness Johnson has provided a seemingly straight-forward
9 response regarding cost recovery for duplicative assets, it comes with conditions which
10 will most certainly impose higher costs on ratepayers.

11 **Q. WHAT CONDITIONS HAS PPL PLACED AROUND COST RECOVERY FOR
12 DUPLICATIVE OR REPLACEMENT ASSETS OR SYSTEMS?**

13 A. Witness Johnson explains (on page 23, lines 9-13 of her testimony) that “PPL and PPL RI
14 will not cause Narragansett to seek approval from the Commission for cost recovery that
15 would require Narragansett customers to pay for the same thing twice. If an asset or system
16 exists already, but PPL and PPL RI must re-create it as a result of the Transaction, then
17 PPL and PPL RI will not seek cost recovery for the ‘pure like-for-like’ replacement of the
18 asset or functionality for which Narragansett customers already have paid.”¹³ In addition,
19 Witness Bonenberger on page 33, lines 4-6 of his testimony states that “PPL will and can
20 only seek recovery of transition costs that generate incremental benefits to customers. And

¹² *Id.* at 23:1.

¹³ *Id.* at 23:9-13.

1 the PUC, with input from the Division, will only approve recovery of transition costs that
2 meet the established regulatory standard.”¹⁴ These witnesses do not define “pure like-for-
3 like” replacements or “incremental benefits,” both of which can be easily argued to allow
4 for the recovery of any additional new capital investment.

5 **Q. HOW DO YOU INTERPRET PPL’S VIEW OF TRANSITION RELATED COST**
6 **RECOVERY?**

7 A. On the surface, it appears that PPL is willing to absorb costs to create infrastructure and
8 systems necessary to separate Narragansett from National Grid rather than seek rate
9 recovery, or at most, seek only the portion of investments that provide “incremental
10 benefits” for customers. PPL does not consider that investments made today are unlikely
11 to replace prior investments on a “pure like-for-like” basis. An asset or system available
12 today to replace one installed or implemented in the past is going to be different due to
13 intervening industry and technology changes, making it unrealistic for new replacements
14 to satisfy a “pure like-for-like” criteria. In addition, today’s investments will naturally bring
15 *some* incremental benefits compared to existing assets or systems due to these same
16 technology advancements. In other words, the majority if not all of PPL’s proposed
17 investments would be subject to rate recovery under PPL’s self-imposed tests.

18 **Q. PLEASE ELABORATE.**

19 A. It is improbable that PPL will be able to recreate assets or systems that exist under National
20 Grid ownership on a “pure like-for-like” basis. National Grid either built the asset or
21 installed the system in prior years, or possibly decades ago, and the same products are not

¹⁴ Rebuttal Testimony of David Bonenberger at 33:4-6 (“Bonenberger Rebuttal Test.”).

1 available today. By the sheer virtue of construction or technology advancements, PPL
2 would never be able to create the same asset or system today and have it conform to modern
3 standards. It will be different and likely more advanced than National Grid's investments.
4 Technology is constantly improving and each successive generation adopted necessarily
5 provides some new, incremental benefit. Theoretically, every investment today would
6 exceed a "pure like-for-like" criteria because the product offering would be different, and
7 would provide some form of additional "benefits" when compared to the asset or system
8 being replaced. This provides PPL ample opportunity to argue that their transition
9 investments would be fully recoverable. If that turns out to be the case, it means the
10 ratepayers will be paying significantly more for new asset replication when they have
11 already paid for the effective, safe and reliable functions which they are receiving today.

12 **Q. PPL STATES THAT IT WOULD ONLY SEEK RECOVERY FOR INVESTMENTS**
13 **PROVIDING INCREMENTAL BENEFITS. DOESN'T THAT SATISFY THE**
14 **DIVISION'S CONCERN WITH POTENTIALLY SIGNIFICANT COST**
15 **RECOVERY REQUESTS?**

16 A. No. Under PPL's plan, PPL will make the first determination to bring transition costs
17 forward for recovery, and then rely on the Division's "experience" and "knowledge" to
18 conduct a review (Bonenberger Rebuttal Test at 33:1). PPL theorizes that costs for "pure
19 like-for-like" investments will not be recovered, but that transition costs that generate
20 "incremental benefits" to customers are eligible for recovery. As I have explained, under
21 this vague standard, PPL could seek rate recovery of virtually every transition investment.
22 The RIPUC and the Division could certainly evaluate requested recovery on a case-by-case

1 basis, but such an undertaking would be arduous and unnecessary but for this acquisition.
2 The question becomes, what part of the investment constitutes a “pure like-for-like”
3 replacement and what part produces an “incremental benefit”? To assess PPL’s proposed
4 cost recovery, the RIPUC and the Division would then have to undertake a complicated
5 and speculative evaluation of the costs associated with “incremental benefits” by
6 comparing future outcomes to what Narragansett customers previously experienced under
7 National Grid’s ownership. It is important to recognize that PPL’s investments would not
8 actually occur today when stakeholders are highly engaged. Instead, these cost recovery
9 discussions would likely take place years from now when PPL would request recovery of
10 major duplicative investments, such as a control center, assuming the transaction is
11 approved in these proceedings. There would be no data or analysis available to validate the
12 National Grid investment that is used as a benchmark, nor would the RIPUC or the Division
13 be able to confirm what would have been the state of operations under National Grid’s
14 ownership in order to determine if benefits were truly incremental. Further, National Grid
15 would have no obligation to participate in such evaluation. PPL’s abstract rate recovery
16 criteria exposes Rhode Island ratepayers to extraordinary rate increase risks. Furthermore,
17 since the Commission is not currently involved in this acquisition authorization process,
18 there is no mechanism for the Commission to protect the ratepayer from these cost
19 implications. PPL’s “pure like for like” and “incremental benefits” standards are
20 unworkable. Without a clear and workable standard applicable to cost recovery of
21 transition costs, the rate increase exposure from transition costs is tremendous.

1 **Q. IN A SCENARIO WHERE PPL RHODE ISLAND PUT FORTH TRANSITION**
2 **COSTS FOR RATE RECOVERY, WOULDN'T COST RECOVERY BE DECIDED**
3 **BY THE RHODE ISLAND PUBLIC UTILITIES COMMISSION?**

4 A. Yes. The Division only has input; it is the Commission that ultimately disallows or
5 approves cost recovery. PPL would seek recovery using a set of non-customary criteria:
6 “pure like-for-like” replacement and “transition costs that generate incremental benefits to
7 customers.” Commission approval must meet the established regulatory standards. Rhode
8 Island’s regulatory standards apply tests of reasonableness and prudence and not “pure
9 like-for-like” replacement or “transition costs that generate incremental benefits to
10 customers.” While the Commission could consider PPL’s criteria in their evaluation, PPL’s
11 proposed test is too vague to be workable and, in any event, is inconsistent with current
12 practice.

13 **VI. CONCLUSION**

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

16 A. The Petitioners rebuttal testimony has not presented any new positions or materials which
17 would cause me to alter my previous testimony, opinions or recommendations. PPL has
18 not shown that the Narragansett acquisition is in the public interest, and has failed to
19 demonstrate that approval will leave Rhode Island ratepayers unharmed. My opinion
20 remains that, if approved as proposed, PPL’s Petition to acquire Narragansett is a lose-lose
21 proposition for Rhode Island ratepayers. I cannot support the acquisition of Narragansett
22 Electric by PPL because I could not establish a single component of the acquisition as

1 proposed that would be in the public interest. I have determined that if this acquisition were
2 to proceed, it would irrevocably damage Rhode Island electric ratepayers and harm the
3 public interest.

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

5 A. Yes.