

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION)
OF OKLAHOMA GAS AND ELECTRIC)
COMPANY FOR AN ORDER OF THE)
COMMISSION APPROVING A RECOVERY)
MECHANISM FOR EXPENDITURES)
RELATED TO THE OKLAHOMA GRID)
ENHANCEMENT PLAN)

CAUSE NO. PUD 202000021

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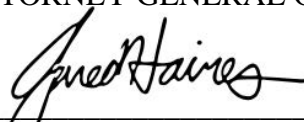
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CORPORATION COMMISSION
OF OKLAHOMA

RESPONSIVE TESTIMONY OF JAMES B. ALEXANDER
ON BEHALF OF
MIKE HUNTER, OKLAHOMA ATTORNEY GENERAL

Mike Hunter, the Attorney General of Oklahoma, on behalf of the utility customers of this State, hereby submits the Responsive Testimony of James B. Alexander in the proceeding referenced above. The Attorney General urges close consideration of the testimony.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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OKLAHOMA ATTORNEY GENERAL

August 25, 2020

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I. Introduction

Q. PLEASE STATE YOUR NAME.

A. My name is James B. Alexander.

Q. PLEASE IDENTIFY YOUR EMPLOYER AND YOUR BUSINESS ADDRESS.

A. I am employed by the Oklahoma Office of the Attorney General (“Attorney General”). My business address is 313 NE 21st Street, Oklahoma City, Oklahoma 73105.

Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

A. I am a graduate of the University of Oklahoma, Price College of Business. I graduated in 2013 with a Bachelor of Business Administration, majoring in Energy Management. I began my career at Invenergy, LLC as a Power Scheduler in the Operations Department. I worked closely with asset managers coordinating generation outage responses, wind energy scheduling, power storage monitoring, and natural gas plant scheduling. While at Invenergy, I monitored and scheduled power production in several regional markets including Independent Electricity System Operator, Electric Reliability Council of Texas (“ERCOT”), New York Independent System Operator, and Pennsylvania-New Jersey-Maryland Interconnection. Following Invenergy, I took a position as a Power Trader and Operations Analyst at the Oklahoma Municipal Power Authority. There, I primarily handled day-ahead and real-time generation scheduling. I also worked on imports between the Southwest Power Pool (“SPP”) and ERCOT, monitored jointly owned units, and coordinated restoration after distribution and generation outages. I have attached a copy of my curriculum vita as Exhibit JA-1.

1 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE OKLAHOMA**
2 **CORPORATION COMMISSION?**

3 A. Yes, I have. My credentials have previously been accepted by the Oklahoma Corporation
4 Commission (“Commission”).

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

6 A. My testimony discusses the reliability improvements included in the Oklahoma Grid
7 Enhancement Plan (“OGE Plan” or “Plan”) proposed by Oklahoma Gas and Electric
8 Company (“OGE” or “Company”). First, I address OGE’s reliability data used to support
9 the need for the OGE Plan. Second, I discuss my review of OGE’s estimate of avoided cost
10 benefits in the avoided cost model. Lastly, I discuss the distribution system replacement
11 and upgrades proposed for inclusion in the OGE Plan in light of the current distribution
12 system.

13 **Q. PLEASE DESCRIBE YOUR REVIEW OF THE COMPANY’S PROPOSAL.**

14 A. After review of the Company’s initial testimony and filings, I prepared a series of discovery
15 questions to clarify aspects of their proposal. I specifically reviewed the categorization and
16 types of outages, DER system capabilities, and vegetation management. I have also
17 reviewed the discovery requests made by other interveners. Following review of the
18 information provided in this case, I reviewed a number of case studies involving smart grid
19 efforts provided by the U.S. Department of Energy. I relied on this review, along with my
20 previous educational and professional background, to develop my testimony.

II. OGE's Reliability Data

Q. DID YOUR REVIEW OF THE COMPANY'S PROPOSAL INCLUDE THE RELIABILITY METRICS PROVIDED BY THE COMPANY?

A. Yes, it did. I reviewed the metrics as filed by the Company in tandem with the various discovery requests issued by various interveners in this cause. I examined the categorizations of outages compared to the company's total number of outages, seeking the distribution equipment-related outages central to this case.

Q. HAVE OGE'S DISTRIBUTION EQUIPMENT OUTAGES IN OKLAHOMA INCREASED?

A. No, they have not. As shown in Exhibit JA-2, which provides data in response to OIEC-OGE-2-4 and OIEC-OGE-2-6, the System Average Interruption Duration Index ("SAIDI")¹ value for distribution equipment outages have decreased since 2015.² Prior to 2015, the Company did not track distribution and transmission outages separately.³ OGE did see a slight increase in outages in 2019, but even that data point was lower than the number of outages from 2016 and should be viewed as anomalous.

Q. WHAT COULD ACCOUNT FOR THE INCREASE IN DISTRIBUTION EQUIPMENT OUTAGES IN 2019?

A. This difference in the number of outages could be for a variety of reasons. The Company could have experienced more intense, but not severe, weather. Also, the Company may

¹ "System Average Interruption Duration Index" or "SAIDI" is a reliability statistic that measures the average outage duration experienced by a customer on an electric system.

² Exhibit JA-2.

³ OGE's Response to OIEC-OGE-2-4.

1 have been more specific on the cause of outages, which is noted in a reduction of the
2 number of outages in the “other” category.

3 **Q. DID YOU MAKE ANY INQUIRIES ABOUT THE REDUCTION IN “OTHER”**
4 **OUTAGES?**

5 A. Yes. The Attorney General issued discovery requests AG-OGE-8-11 and AG-OGE-8-12
6 to learn more about the reduction in outages in the “Other” category. OGE included the
7 following in its supplemental response: “The Company would not consider one anomalous
8 year of decline as significant.”

9 **Q. DOES OGE’S REASONING ABOUT OTHER OUTAGES APPLY TO**
10 **DISTRIBUTION EQUIPMENT OUTAGES IN 2019?**

11 A. Yes, it does. If the Company views a single year of a decline in a particular outage category
12 as insignificant, the same should be held true for an anomalous increase for a given year,
13 especially when the prior years trended so closely together. The average SAIDI for
14 distribution equipment from 2016 to 2018 was 87.3, and 2019 was 88.55.⁴

15 **Q. PLEASE EVALUATE WHETHER THE RELIABILITY DATA PRESENTED BY**
16 **OGE SHOWS A PRESSING NEED FOR SIGNIFICANT ADDITIONAL**
17 **INVESTMENT.**

18 A. It does not. The Company’s distribution equipment related outages have remained
19 consistent since 2015. While the Company may believe there is a need for additional
20 investment in distribution equipment, this is not reflected in the recent SAIDI values.

⁴ OGE’s Response to OIEC-OGE-2-4.

1 **Q. WHAT HAS THE COMPANY PROPOSED IN THIS CAUSE TO RESOLVE ITS**
2 **PURPORTED SAIDI ISSUES?**

3 A. OGE has proposed a five-year investment plan, the Oklahoma Grid Enhancement Plan
4 (“OGE Plan”). The OGE Plan is centered on the replacement of allegedly aging
5 infrastructure and the installation of new technology, equipment, and communication
6 systems. The Company hopes to improve reliability, resiliency, flexibility, efficiency, and
7 affordability.

8 **Q. DO YOU RECOGNIZE RELIABILITY GOALS AS BEING BENEFICIAL TO**
9 **CUSTOMERS?**

10 A. Yes. Reliability improvements can benefit customers in ways that can be quantified and
11 analyzed. A thorough and well-documented analysis can be used by stakeholders to
12 evaluate reliability improvements and benefits like reductions to operations and
13 maintenance (“O&M”) expenses.

14 **Q. HOW DOES YOUR EVALUATION OF OGE’S RELIABILITY DATA IMPACT**
15 **THE ATTORNEY GENERAL’S EVALUATION OF OGE’S PROPOSAL IN THIS**
16 **CASE?**

17 A. The Attorney General recognizes the economic and social impact of reliability
18 improvements. The review of the plan proposed does not substantiate a pressing need for
19 improvement in the timeframe presented by the Company. Nevertheless, the Attorney
20 General would support improvements with demonstrated benefits that result in a positive
21 net present value (“NPV”) for customers.

1 **Q. HOW SHOULD THE COMMISSION EVALUATE PROPOSALS FOR**
2 **ADDITIONAL GRID INVESTMENT?**

3 A. The Commission should evaluate proposals for additional grid investment based on the
4 specific technologies that provide strong expected benefits. The Commission should give
5 preference to technologies that have a positive NPV and provide immediate reliability
6 benefits to customers. The Commission should also examine technologies that can be
7 applied to existing infrastructure, which may delay the need for future investment.

8 **III. Avoided Cost Benefits**

9 **Q. PLEASE SUMMARIZE YOUR REVIEW OF OGE’S AVOIDED COST BENEFITS**
10 **INCLUDED IN THE AVOIDED COST MODEL.**

11 A. OGE used its current expenses for items such as storm recovery to estimate a total
12 opportunity for cost reduction. It then applied reliability improvements and took other steps
13 to estimate how much of that opportunity could be realized when making grid
14 modernization investments. I evaluated OGE’s estimates for reasonableness, and my
15 discussion below focuses on avoided storm cost expenses.

16 **Q. HOW HAS THE COMPANY ESTIMATED AVOIDED COST BENEFITS?**

17 A. In the cost-benefit model the Company has used, the reliability metrics of the modernized
18 circuits form the starting point for the calculation of avoided storm damage costs. The
19 company has taken the SAIDI improvement values it projects compared to a three-year
20 average to reach a 60% improvement, which has been assumed by the company for SAIDI
21 improvement both with and without storm factors. OGE then assumed this 60%
22 improvement in SAIDI statistics would result in a one-for-one reduction in storm recovery
23 expenses. OGE then used this 60% improvement to calculate an additional improvement

1 based on the average number of pole replacements for modernized vs non-modernized
2 circuits. The result of OGE's estimate is an 88% reduction in storm cost recovery expenses
3 at each circuit modernized as part of the OGE Plan.

4 **Q. IS THE 60% ESTIMATED SAIDI IMPROVEMENT A FAIR STARTING POINT**
5 **FOR OKLAHOMA CIRCUITS?**

6 A. It is not. OGE based its 60% estimated SAIDI improvement on a single year's improvement
7 in Arkansas after it made similar grid modernization investments in its service territory
8 there. However, the Company's selection of SAIDI data from Arkansas is not a reasonable
9 starting place for the calculation of benefits for Oklahoma circuits. The Company's
10 selected years for the three-year average show different trends and background SAIDI
11 levels between Oklahoma and Arkansas. As shown in Figure JA-1 below, the Distribution
12 2016-2018 SAIDI values, including major storms, were significantly worse for the
13 Arkansas system. This could be for a variety of reasons, but the most identifiable difference
14 is simply geographical separation. One year of data for Arkansas systems will not be
15 reflective of long-term Oklahoma storm damage cost trends. Further, even if improvements
16 in Arkansas at this level were sustainable, it is much more feasible to improve a system
17 with worse SAIDI statistics by 60% than it is to improve a system with better SAIDI by
18 the same 60%. As you can see in Figure JA-1 below, OGE's reliability statistics in
19 Oklahoma are already much better over the last several years than its statistics in Arkansas.

Figure JA-1

Oklahoma	
Distribution - INCLUDING major storms	
Year	SAIDI
2016	168.79
2017	152.16
2018	101.54
3 year average	140.83
2019	314.55

Arkansas	
Distribution - INCLUDING major storms	
Year	SAIDI
2016	523.52
2017	261.48
2018	155.70
3 year average	313.57
2019	239.97

Oklahoma	
Distribution - EXCLUDING major storms	
Year	SAIDI
2016	100.13
2017	86.94
2018	74.84
3 year average	87.30
2019	88.55

Arkansas	
Distribution - EXCLUDING major storms	
Year	SAIDI
2016	69.28
2017	112.43
2018	94.24
3 year average	91.98
2019	88.87

Oklahoma	
Major Storms	
Year	SAIDI
2016	68.66
2017	65.22
2018	26.71
3 year average	53.53
2019	225.99

Arkansas	
Major Storms	
Year	SAIDI
2016	454.24
2017	149.05
2018	61.46
3 year average	221.58
2019	151.10

1 **Q. IS IT REASONABLE TO ASSUME A DIRECTLY PROPORTIONAL DECREASE**
2 **TO STORM RECOVERY EXPENSES BASED ON AN IMPROVEMENT IN**
3 **SAIDI?**

4 **A.** No, it is not. While the company may be able to offset some of the O&M expenses related
5 to storm damages, capital expenditures may not be affected by reduced SAIDI. When storm
6 damages do occur, a reduction in SAIDI does not accurately reflect the costs associated

1 with restoring power. The cost to replace some equipment is largely the same, regardless
2 of the offset SAIDI value.

3 **Q. COULD YOU IDENTIFY ANY EXAMPLES OF TECHNOLOGIES IN THE OGE**
4 **PLAN THAT COULD REDUCE SAIDI BUT NOT MATERIALLY CHANGE**
5 **CAPITAL EXPENDITURES TO RECOVER FROM STORMS?**

6 A. Yes. If a substation were to be damaged in a storm, a mobile substation could be used to
7 restore power to those customers. The SAIDI values would be improved, but the cost to
8 restore the substation would be unaffected. For another example, automatic circuit switches
9 could isolate an outage to a small number of customers almost immediately. This
10 significantly lowers the total SAIDI value of that outage, but the cost to repair the down
11 infrastructure may not significantly change.

12 **Q. DO YOU HAVE ANY CONCERNS WITH HOW OGE'S CALCULATIONS MOVE**
13 **FROM A 60% IMPROVEMENT TO AN 88% REDUCTION IN STORM COSTS?**

14 A. Yes. In their SAS VA tool calculation, the Company appears to account for the benefit of
15 updated facilities' new poles twice. The beginning point of 60% reflects the actual
16 performance of the Company's upgraded circuits in Arkansas for 2019 when compared to
17 the three-year average. These upgraded circuits would already include the benefit of new
18 poles being placed in service. The Company has then taken that 60% value and added an
19 additional benefit to reflect a lower number of poles needing to be replaced during storms,
20 using the resulting value to calculate total benefits. This adjustment conflicts with the
21 response to discovery request AARP-OGE-1-5(C), where OGE stated that the 60% SAIDI
22 reduction includes major storms and should thus include all storm-related reliability
23 benefits.

1 **Q. WHAT IS YOUR CONCLUSION ABOUT THE AVOIDED COST BENEFITS**
2 **INCLUDE IN OGE’S AVOIDED COST MODEL?**

3 A. As they are currently presented, the Company’s calculations do not reflect realistic long-
4 term cost benefit analysis. The Company’s estimate for long-term reliability improvements
5 being calculated from just a single year does not allow for reliable modeling of storm cost
6 savings. Further, the data set for Arkansas is not reflective of Oklahoma’s circuits,
7 especially the effect of major storms. OGE’s models will not reliably identify the savings
8 associated with grid modernization projects.

9 **IV. OGE’s Proposed Upgrades**

10 **Q. IN YOUR OPINION, WOULD THE INVESTMENTS AS PROPOSED ACHIEVE**
11 **RELIABILITY IMPROVEMENTS?**

12 A. There are technologies and investments in the OGE Plan that I would expect to achieve
13 reliability and resiliency improvements. However, as I will discuss, I am concerned that
14 the level of benefit, on a technological and investment basis, is not discernable as presented
15 in this case.

16 **Q. WHAT ARE YOUR CONCERNS WITH HOW OGE HAS PRESENTED THE**
17 **RELIABILITY IMPROVEMENTS IT EXPECTS FROM THE OGE PLAN?**

18 A. OGE’s proposal presents the OGE Plan in an “all or nothing” format, estimating reliability
19 improvements for all projects at a substation and not on an individual investment level.
20 Thus, while some of the technologies included in OGE’s portfolio may provide some level
21 of reliability benefits, the Company has elected to present its case in a way that makes
22 critical evaluation impossible.

1 **Q. WHAT KIND OF ANALYSIS WOULD HAVE MADE EVALUATION POSSIBLE?**

2 A. The Company should have included an investment-by-investment or technology-by-
3 technology analysis. As it stands today, the Company is asking us to review supposed
4 benefits on a substation basis, without identifying which substations will be selected
5 beyond the first two years. This type of analysis should have been applied alongside a cost-
6 benefit analysis that included such technologies applied to existing infrastructure.

7 **Q. WHY IS OGE’S PRESENTATION OF THE ALLEGED BENEFITS SO**
8 **IMPORTANT FOR EVALUATING ITS PROPOSAL?**

9 A. Consider a future rate case that includes a prudence review of the investments
10 contemplated here. If all of the investments are in place at the time together, it would be
11 substantially more difficult to determine which investments are providing what amount of
12 benefit—if any. This risk to customers is offset by traditional ratemaking because the
13 Company would be incentivized to invest in infrastructure that has a positive NPV and
14 directly offsets annual expenses. If the investment provides excess benefits to its costs, the
15 Company keeps that profit until a rate case. If an investment does not provide excess
16 benefits, the Company carries that cost until the investment is considered for inclusion in
17 base rates, at which point the Company may be compensated. OGE’s proposed rider
18 mechanism effectively eliminates any such incentives, making it all the more important
19 that the Commission carefully consider the types of investments being proposed before
20 approving the rider.

21 **Q. IS THE PRUDENCE OF OGE’S PLAN BEING REVIEWED IN THIS CASE?**

22 A. No, it is not. However, the Company would begin to recover costs from customers before
23 the prudence of Plan investments is determined in a future rate case. While prudence is not

1 being reviewed in this case, it is irrational and irresponsible to ignore whether contemplated
2 investments would provide benefits to customers.

3 **Q. MOVING BACK TO THE SPECIFIC ITEMS IN THE OGE PLAN, COULD YOU**
4 **DESCRIBE THE INVESTMENTS AND TECHNOLOGIES OGE PROPOSES TO**
5 **INCLUDE IN THE PLAN?**

6 A. A significant portion of what the Company has requested recovery for are technologies that
7 should be considered normal distribution investments. This category includes OGE's
8 proposed investments in pole and line replacement. I tend to agree with the Company's
9 expectation that new equipment, compared to aging infrastructure near the end of its useful
10 life, is less likely to fail in conditions beyond normal operations. This has been my direct
11 experience as an operator and trader; however, there are limitations to this relationship. If
12 a one-hundred-year-old ash tree falls onto a distribution line, the condition and age of the
13 line is inconsequential. The equipment will fail. Further, an expectation of reliability
14 improvement does not address the cost of replacing old equipment before the end of its
15 useful life. As I have explained, OGE has not provided an analysis specific to this category
16 of investment.

17 **Q. SHOULD THESE TYPES OF INVESTMENTS BE RECOVERED OUTSIDE OF**
18 **TRADITIONAL RATEMAKING?**

19 A. Generally, no. Attorney General expert witness Todd Bohrmann testifies further about
20 whether normal distribution investments should be included in the proposed rider.

1 **Q. COULD YOU PLEASE DESCRIBE ADDITIONAL CATEGORIES OF**
2 **INVESTMENTS PROPOSED BY OGE?**

3 A. The Company has also proposed investments that would be found commonly in
4 distribution systems across the country. An example of a technology commonly found in
5 distribution systems is automatic circuit reclosers (“ACR”). Breakers with ACRs not only
6 attempt to reclose after a fault has occurred, but they send a message to the operator
7 detailing which breaker has opened and why. Breakers that do not have this technology
8 must be manually closed by a service technician, which increases the duration and cost of
9 each individual outage. The Company currently utilizes ACR technology but seeks to
10 upgrade existing ACRs that lack communication technology, which is installed on roughly
11 20% of its circuits.⁵ The Company claims this would shorten the duration of outages that
12 require manual reclose operations.⁶ Another example of investments that are commonly
13 used across the country are animal barriers. These are low-cost risk mitigation investments.
14 These types of investments could work to lower O&M expenses over time while also
15 improving the reliability of the system.

16 **Q. WOULD THE CATEGORY OF INVESTMENTS YOU JUST DESCRIBED BE**
17 **NORMAL DISTRIBUTION GRID INVESTMENTS?**

18 A. Yes. Generally, I would categorize these technologies as being normal investments. Each
19 system has its own needs and may not warrant having such investments, but those are
20 exceptions to the rule.

⁵ OGE’s Response to AARP-OGE-1-13.

⁶ *Id.*

1 **Q. HAS THE COMPANY PLANNED FOR EQUIPMENT THAT GOES BEYOND**
2 **WHAT YOU WOULD CONSIDER NORMAL INFRASTRUCTURE?**

3 A. Yes. One example would be automated feeder switches and the communication systems
4 that could operate them. These are investments that I would not categorize as being widely
5 adopted throughout the grid.

6 **Q. WHAT ARE AUTOMATED FEEDER SWITCHES AND WHAT DO THEY DO?**

7 A. Operationally speaking, automated feeder switches communicate with each other along a
8 given circuit. In the event of an outage situation, such as a tree falling onto a line, the two
9 switches on either side of the downed tree would isolate the outage, tie into another circuit,
10 and resume power to all customers up to either switch. The switches would also
11 simultaneously notify the control center of the fault location. While there is equipment in
12 OGE's portfolio that currently allows for this type of isolation and restoration, the
13 Company has noted that it requires field technicians to manually control them.

14 **Q. WOULD YOU EXPECT TO SEE RELIABILITY IMPROVEMENTS WITH THE**
15 **ADOPTION OF THESE TYPES OF TECHNOLOGIES?**

16 A. Yes, I would expect to see some reliability benefit from these specific technologies. I
17 reviewed a case study from the City of Naperville, a municipal electric provider in Illinois,
18 which utilized these types of investments paired with burying lines. The provider
19 experienced an improvement in SAIDI ranging from 14 to 55 percent, depending on
20 weather and other conditions.⁷

⁷ *At the Forefront of Smart Grid: Empowering Consumers in Naperville, Illinois*, U.S. Dept. of Energy (Oct. 21, 2011).

1 **Q. COULD THE ATTORNEY GENERAL SUPPORT INVESTMENTS LIKE**
2 **AUTOMATED FEEDER SWITCHES?**

3 A. Yes, if an appropriate cost-benefit analysis were provided. It is unfortunate that the
4 Company has failed to provide an analysis or study calculating the expected benefits of its
5 investments on a technology-by-technology or investment-by-investment basis. Without
6 such a granular review, the effects of such a technology on OGE's distribution system are
7 indiscernible, and it would be irresponsible to support extraordinary rider recovery for
8 them.

9 **Q. DO YOU HAVE ANY OTHER CONCERNS ABOUT THE LACK OF**
10 **TECHNOLOGY-SPECIFIC ANALYSIS FROM OGE?**

11 A. Yes. The lack of a technology-specific cost-benefit analysis also raises the question of
12 whether the Company made any effort to seek out the lowest reasonable costs for its
13 customers. For example, it could be that a limited portion of the proposed investments
14 could provide greater value than the remainder of the proposed plan. In other words, the
15 vast majority of the benefit might be achieved by a smaller selection of technology
16 upgrades within the OGE Plan. For example, just adding automated switches to existing
17 infrastructure could provide a greater value to customers and even offset the need for a
18 five-year grid modernization program. These possibilities appear to have been completely
19 ignored by the Company.

20 **Q. WHAT ACTION DO YOU RECOMMEND THE COMMISSION TAKE WITH**
21 **REGARD TO OGE'S PROPOSED PLAN?**

22 A. I recommend the Commission deny the Company's request to recover costs for the OGE
23 Plan at the present time. The Company's presentation lacks an analysis of reliability

1 improvements tied to specific technologies, which makes it impossible to evaluate the
2 projects on an investment-by-investment or technology-by-technology basis. The
3 Company's lack of analysis of technology-based reliability improvement shows a
4 fundamental lack of reasonable cost recovery, and it would be irresponsible to require
5 customers to pay for the investments at this time.

V. Conclusion

7 Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

8 A. I testified on behalf of the Attorney General regarding the technologies involved in OGE's
9 proposal. In my review, I found OGE's distribution equipment related outages as not being
10 reflective of a pressing need for additional investment by the Company. I recommend the
11 Commission evaluate proposals for additional grid investment based on the specific
12 technologies and the benefits they provide. The avoided cost benefits identified by the
13 Company in its avoided cost model are not realistic because they rely on Arkansas data
14 that is not applicable in Oklahoma, and they incorrectly assume a directly proportionate
15 relationship between SAIDI reduction and storm cost reduction. Further, while I would
16 expect some of the technologies presented in the Plan to provide reliability improvements,
17 the amount of benefit on a technology-by-technology basis is not available. Further, the
18 Company's request includes distribution investments that I would consider part of normal
19 investments, which should be recovered through traditional ratemaking. I recommend the
20 Commission deny the request by the Company on the above described grounds.

1 **Q. DO YOU HAVE ANY ADDITIONAL COMMENTS?**

2 A. Yes. My testimony is limited to the subject matters discussed. The Commission and the
3 stakeholders should not infer my agreement with or support for a subject matter not covered
4 in this testimony.

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

6 A. Yes, it does.