

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 22-4100-TF

**Petition of Washington Electric
Cooperative, Inc. requesting an overall
rate increase of 14.19% to take effect on a
service-rendered basis commencing
November 1, 2022**

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**SUPPLEMENTAL
PREFILED TESTIMONY
OF
SHAWN ENTERLINE
ON BEHALF OF**

WASHINGTON ELECTRIC COOPERATIVE

January 23, 2023

Summary

Mr. Enterline's testimony responds to items 5 and 9 of the Commission's January 6, 2023 information requests.

Exhibit

Exhibit PUC 9 WEC-Ryegate Invoice Dec. 2022

1 **Q1. Please state your name and position.**

2 **A1.** My name is Shawn Enterline, and I am a senior power supply analyst at the
3 Vermont Public Power Supply Authority.
4

5 **Q2. What is your educational and professional background?**

6 **A2.** I hold a BS and MS in Economics from the Pennsylvania State University, where I
7 specialized in forecasting electricity and natural gas demand. Since then, I have
8 held a series of senior analytical and consulting positions. My utility experience
9 includes Until Corporation, Pacific Gas and Electric, the Burlington Electric
10 Department, and Green Mountain Power. My consulting experience includes
11 government, non-profit advocacy and utility clients across the US and Canada
12 while working for the Vermont Energy Investment Corporation and Dunskey Energy
13 Consulting.
14

15 **Q3. Have you previously testified before the Vermont Public Utility**
16 **Commission?**

17 **A3.** Yes, most recently earlier in this proceeding and before then in support of the
18 Village of Enosburg Fall's 2020 Rate Case.
19

20 **Q4. What is the purpose of your testimony?**

21 **A4.** To respond to items 5 and 9 of the Commission's January 6, 2023 information
22 requests.

1 **Q5. Please respond to item 5 of the Commission’s information requests.**

2 **A5. Item 5 asks:**

3 5. Q.PSD.WEC.1-18 requests additional information to explain the estimated
4 reduction of revenue associated with net metering. In addition to these
5 questions, WEC is requested to respond to the following questions:

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- 7 a. Regarding the \$235,114 decrease in rate-year revenue from expected
8 additional net-metering systems, what is the basis for the expected
9 additional net-metering systems? For example, are these net-metering
10 systems that have already received a certificate of public good from the
11 Commission?
12 b. Beyond the summary of all pending net-metering applications requested
13 in the Department’s discovery request 1.18.c, what assumptions formed
14 the basis for this adjustment?

15
16 Louis Porter’s supplemental testimony is responsive to Item 5(a), and the following
17 explanation is intended to be responsive to Item 5(b). The calculation of reduced revenue rests
18 on four assumptions.

- 19 1. An avoided retail electric rate of \$0.24034/kWh.
20 2. A capacity factor of 13%.
21 3. Estimated kWh generation from systems actually installed during the Test Year.
22 (Total installed kW during the Test Year was 963 kW.)

1 4. Estimated kWh generation from systems that are expected to be installed during the
2 Rate Year, where Rate Year installed kW is assumed to match the pace and volume of
3 installed kW in the Test Year.

4 The sum of these two sources of generation (Test Year + Rate Year) was multiplied by the
5 avoided retail rate to arrive at the adjustment, whose step-by-step calculations can be found in
6 Exhibit WEC-1 Schedule 16 (Filed on 9/15/2022).

7
8 **Q6. Please respond to item 9 of the Commission's information requests.**

9 **A6.** Item 9 asks:

10 9. On page 7 of Mr. Enterline's testimony, he states that the price for the Ryegate
11 resource is \$107.27/MWH and that this is the price during the last month of the test
12 year. Please explain why this is appropriate given the legislative changes in Act 155
13 and pending litigation in Case No. 22-3944-PET. In that case, in an Order dated
14 10/26/22, the Commission authorized a six-month extension at \$0.10/kWh
15 beginning November 1, 2022.

16
17 The \$107.27 price for the Ryegate resource was appropriate at the time of the rate case filing
18 (9/15/22) because it was the most current and accurate information available at the time. While
19 Act 155 was effective in May of 2022, the proceeding implementing it, Case No. 22-3944-
20 PET, has not reached a definitive conclusion or milestone and may not for some time.

21

1 The Commission's 10/26/22 Order and Act 155 preserve the base-rate status quo for limited
2 periods of time, and VEPP Inc. has implemented the Order. Please refer to Exhibit PUC 9
3 WEC-Ryegate Invoice Dec. 2022. This exhibit shows the most recent invoice for Ryegate, and
4 it uses a price of \$111.62/MWH. As noted on the invoice, this price includes the Annual Base
5 Rate plus a Quarterly Fuel Price Adjustment as allowed in the 10/26/22 Order. In light of the
6 PUC's 10/26/22 Order and this most recent invoice, \$111.62/MWH seems to be the most
7 current and appropriate price to use in the Rate Year and indicate that WEC may have
8 underestimated the costs of the Ryegate resource.

9 **Q7. Does this conclude your supplemental testimony?**

10 **A7.** Yes, at this time.

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12
13
14 [REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]
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WASHINGTON ELECTRIC COOPERATIVE, INC.

Shawn Enterline, Senior Power Supply Analyst
Vermont Public Power Supply Authority

At _____ Vermont, this 23rd day of January 2023, Shawn Enterline personally appeared before me and affirmed that the facts and matters contained herein are true to the best of his knowledge, information, opinion, and belief, and that he executed the foregoing document as his free act and deed.

Notary Public
My Commission Expires _____