

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3501-PET

Petition of Green Mountain Power for approval)
of its Zero Outages Initiative as a strategic)
opportunity pursuant to 30 V.S.A. § 218d and)
GMP's multi-year regulation plan)

**PREFILED REBUTTAL TESTIMONY OF
JOSHUA CASTONGUAY
ON BEHALF OF GREEN MOUNTAIN POWER**

April 15, 2024

Summary of Testimony

Mr. Castonguay responds to Department witnesses on the topics of the role of customer energy storage as part of ZOI, updates the Commission on GMP's ongoing work in these areas since the ZOI petition was filed last October, and explains how GMP will track success of storage deployment for ZOI.

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**PREFILED REBUTTAL TESTIMONY OF
JOSHUA CASTONGUAY
ON BEHALF OF GREEN MOUNTAIN POWER**

I. Introduction and Summary of Testimony

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

2 A1. My name is Joshua Castonguay. I am employed by Green Mountain Power (“GMP”) as
3 Vice President, Chief Innovation Executive.

4 **Q2. Have you previously submitted testimony in this proceeding?**

5 A2. Yes, I previously provided prefiled direct testimony on October 9, 2023 in support of
6 GMP’s proposed Zero Outages Initiative (“ZOI”).

7 **Q3. Can you start by explaining the purpose of your testimony?**

8 A3. I respond to testimony from Anne Margolis, Bill Jordan, and Kevin Mara regarding
9 customer storage proposed under GMP’s ZOI. In response to Ms. Margolis’ testimony, I
10 explain how GMP is prioritizing our customer storage program in the first phase of ZOI
11 to focus on vulnerable customers who are often located in the most rural areas of our
12 system. This is about safety and equity. As we have seen with the increased interest and
13 customer installations for our ESS lease, energy storage programs continue to grow in
14 popularity, showing continued increasing demand from customers because they work. I
15 also address comments from Mr. Jordan and Mr. Mara regarding the value of storage for
16 avoiding outages; I strongly disagree with their perspective. These customer storage
17 options serve a critical and unique role in our ZOI work keeping customers powered up

1 and safe during storms and other events on the grid. We must move faster to implement
2 these already proven solutions for all customers, particularly those with tough individual
3 circumstances and more limited means. Finally, I discuss how we will show the
4 Commission and customers the success of our ZOI storage installations during Phase 1.

II. The Value of Customer Storage and Its Role in the ZOI

5 **Q4. To begin, can you describe how GMP views customer storage within its ZOI**
6 **framework?**

7 A4. ZOI will create an updated, modern energy system that will provide reliability and
8 resiliency for all customers and be more cost-effective than the status quo, delivering
9 lasting solutions in the face of climate change and other reliability threats. Mr. Burke's
10 testimony focuses on the distribution system upgrades that are key to improving
11 reliability for customers in all our territory. The customer storage component of ZOI
12 complements our distribution work and is critical for providing a resiliency solution for
13 all customers by 2030 that eliminates outages they would otherwise experience. For
14 many that will mean an in-home storage system; for others in future years, it might mean
15 a vehicle-to-home technology solution that can be used during severe weather or when
16 the grid goes down. This allows for resiliency across our whole system in the case of
17 broader grid outages from cyber, regional load shedding, or physical attacks, as well as
18 individual customer resiliency during extreme weather or other events. Used this way,
19 storage works in tandem with distribution hardening to achieve the ultimate goals of ZOI,
20 which is to keep customers on all the time, including in the face of damaging climate

1 change driven storms and other extreme events. Additionally, as we have discussed in the
2 last three GMP Integrated Resource Plans, energy storage solutions ultimately support
3 broader distributed energy resource platforms providing a host of additional benefits day
4 in and day out. This includes managing peak energy demands, assisting grid stability,
5 increasing renewable generation hosting capacity, supporting the intermittency of these
6 renewables, and providing the regional grid operator with various services that lower
7 costs for all customers.

8 **Q5. You discuss GMP's existing ESS tariff as showing the value of using storage in the**
9 **ZOI in your direct testimony. Can you update us on the status of ESS installations**
10 **since you filed the ZOI last fall?**

11 A5. In August of 2023, the Commission raised the 500 installations per year cap on the ESS,
12 recognizing the strong and increasing customer demand for that program. Since that time,
13 more and more customers have signed up for the program and installations have ramped
14 up significantly. We now have over 3,200 customers already installed and enrolled in the
15 program, and through the first three months of 2024, we have been able to install an
16 average of 140 systems for customers per month. Through that same period, we have
17 seen an average of 170 customers signing up each month. At any given time, there are
18 approximately 100 to 200 customers ready for installation, which happens quickly.

19 As a result, more customers now have an opportunity to choose to participate with
20 a storage system lease in this popular and proven program and we will seek to increase
21 capital investment to support customer demand for this lease program. The continued

1 success of this program will complement the ZOI energy storage installations in Phase 1
2 that are planned for our most rural customers. During this time, the ESS tariff will
3 continue for customers who are not located in the rural areas subject to our Phase 1 ZOI.
4 In the future, based on the results of Phase 1 and incorporating new technological
5 advances in energy storage and electric transportation, we anticipate a comprehensive
6 statewide energy storage solution for all GMP customers.

7 **Q6. In your direct testimony last October, you also described the grants and other**
8 **projects GMP was applying for to advance our customer storage work. Can you**
9 **provide an update on those applications?**

10 A6. Yes. **Exhibit GMP-JC-2** is a short chart showing the current status of programs and
11 federal grant opportunities, including those I indicated in my direct testimony. We are
12 currently working with the Department of Energy (DOE) to implement the Long
13 Duration Energy Storage Demonstration in partnership with NOMAD, which will
14 provide mobile energy storage systems that each provide full output power over 10 hours
15 at five sites, providing benefit to the communities served near those systems and proving
16 the value of mobile storage.¹ We are also working on a Grid Resilience and Innovation
17 Partnership (“GRIP”) grant proposal, after initial positive feedback from the DOE. The
18 GRIP project is designed to implement several complete Zero Outage circuits for
19 customers specifically in Justice 40 communities, separate but complementary to the ZOI

¹ <https://vermontbiz.com/news/2023/august/02/doe-awards-95-million-long-duration-energy-storage-remote-vt-communities>

1 Petition. Application success is not guaranteed, but we continue to pursue any options to
2 help customers.

3 **Q7. Turning to the implementation of the ZOI, can you outline how GMP plans to**
4 **prioritize customers to receive storage as part of Phase 1 of the ZOI?**

5 A7. As noted in our initial testimony, we will deploy customer storage in targeted areas
6 within Zone 4, the most rural customers in Vermont. As outlined by Mr. Burke,
7 customers in these areas experience outages more frequently and for longer durations and
8 have been disproportionately impacted by devastating extreme weather events. I explain
9 our implementation further below.

10 **Q8. Ms. Margolis expresses the opinion that GMP should prioritize work in the first**
11 **phase of ZOI to ensure it is delivering benefits to the customers and communities**
12 **most in need. Do you agree?**

13 A8. Yes, we agree it is important to prioritize our ZOI work to equitably serve our customers,
14 and our approach in Phase 1 has always been to do just that. As outlined in Mr. Burke's
15 initial testimony and described further in his rebuttal testimony and in Ms. Smith's
16 rebuttal testimony, all our ZOI work is guided by the overarching criteria developed in
17 our initial Climate Plan, which was then expressly incorporated into our latest IRP. These
18 criteria consider a range of factors, including but not limited to data in our 4.900 reports
19 on our 20 least reliable circuits; the type, age, condition, and location of assets; the
20 number of customers served by each circuit; outage hours and expected benefits of the
21 ZOI approach; and the critical facilities served by the circuit.

1 As with the T&D investments described by Mr. Burke, our customer storage
2 deployments in Zone 4 under ZOI will be similarly informed by these criteria. In Phase 1,
3 this means focusing a significant portion of our work on several of our least reliable
4 circuits—starting with the two circuits that we are focusing on delivering a complete ZOI
5 rollout during this first phase: the EJ-G7 circuit in the East Jamacia area and the 56G1
6 circuit in the Wilmington/Halifax/Whitingham area. Our remaining storage deployment
7 will focus on other Zone 4 customers in areas that are among our least reliable circuits.
8 The EJ-G7 circuit is at the top of our 20 least reliable circuits and is one of our longest,
9 running through several communities with challenging rural infrastructure that is often
10 hard-hit by damaging storms. The nearby 56G1 faces the same challenges, with a portion
11 of that circuit equivalent to our fifth-worst performing circuit and as explained by Mr.
12 Burke serves many customers who would benefit most from achieving a ZOI circuit.

13 As described further by Mr. Burke, we will focus on a complete buildout of ZOI
14 measures across all zones, including customer storage to complement grid hardening
15 work. We estimate that Zone 4 customer storage solutions in these two priority circuits
16 will require approximately \$20M of the proposed \$30M Phase 1 battery program. This
17 comprehensive approach will let us track and report on the success of ZOI work on a
18 circuit-wide basis and inform future phases of ZOI work.

19 Other customer storage projects pursued in Phase 1 beyond these initial
20 communities will be guided by the same criteria, focusing on Zone 4 customers in other
21 parts of our territory. This will ensure we are focusing investments in communities that
22 are most in need, and that we are improving reliability, safety, and resiliency for those

1 customers, while delivering the broader grid benefits of storage for all our customers. At
2 the same time, our ESS and BYOD programs will continue so that customers on other
3 parts of the system can choose to install storage as they can today.

4 It is important to note that the equity benefits delivered in the first phase of ZOI
5 come right away, even before we have completed the rest of our ZOI work, contrary to
6 Ms. Margolis' direct testimony.² For almost a decade, all over Vermont, customers with
7 storage are already benefiting from and proving the value of these systems as a resiliency
8 resource; our prioritized ZOI approach simply extends that benefit equitably to many
9 other customers who are most impacted, with the urgency required of this time,
10 delivering it as part of our service—just as we do, for example, a meter. Pursuing this
11 work now in Phase 1 will address the critical needs of these prioritized areas sooner,
12 while also helping scale up these systems to benefit other customers in later ZOI phases.
13 Just as we do with smart meters, customers will have the option to have the energy
14 storage installed or not.

15 **Q9. Mr. Mara testifies that while batteries can be beneficial for customers, he views**
16 **their backup service for customers as a secondary function.³ Do you agree?**

17 A9. No, I do not. Providing power during outages is the primary function behind our battery
18 programs including as contemplated in ZOI, and it is enabled by the programs we have
19 set up to leverage the additional benefits provided by storage. The batteries already
20 provide other proven and important benefits to all our customers, with frequency

² See Prefiled Direct Testimony of Anne Margolis at 10-13.

³ Prefiled Direct Testimony of Kevin Mara ("Mara pf.") at 20.

1 regulation market and peak reduction delivering several million in power supply cost
2 savings to all. It is clear through the success of our existing programs that customers love
3 the peace of mind and safety these storage systems bring during an outage. In every storm
4 event we get feedback from customers with installed storage who were incredibly
5 satisfied with the performance of their storage system, remaining safe and comfortable
6 throughout the event. The screenshot below is just one example of customers being able
7 to stay safe while the grid is experiencing outages.

From: Bobbie [REDACTED]
Date: April 14, 2024 at 10:32:37 AM EDT
To: "Kelly, Kristin"
Subject: Re: Thanks and can you post to Facebook?

Great - Thanks for sharing this Kristin.

I was lucky enough to be able to get powerwall batteries when you offered them as a promotion many years ago, so my power needs are met during outages.

That said I know not everyone has access to them, so all you do to keep the power on for GMP customers is really appreciated.

All the best to everyone there.

Bobbie

8
9 This is particularly true during significant storm events like the heavy wet snow fall event
10 just experienced in April of this year, which saw over 87,000 customers lose power.
11 During that event about 1,000 customers were able to stay powered up thanks to their
12 battery system. This strong performance must be contrasted with the experience of our
13 customers who are continuing to face outages that could be avoided with this readily
14 available technology. These testimonials, summarized by Ms. Smith, are extremely
15 difficult to hear particularly when we know there are solutions to help. Even in cases
16 where the customer has a generator, there are often issues with the customer's ability to
17 utilize that generator. For example, one customer in the recent April storm was unable to
18 shut down and transfer off their generator on their own. Our team was able to help once

1 power was restored, but we often hear about challenges with generators, their safety, the
2 cost to run them, and the need to keep them fueled up. By contrast, the battery systems
3 we install and manage for customers have automated controls that seamlessly take over
4 when an outage hits.

5 **Q10. Mr. Jordan testified that outages avoided through storage should not be thought of**
6 **as an avoided outage and may need to be “discounted” in measuring the success of**
7 **ZOI. How do you respond to this perspective?**

8 A10. We disagree that customer storage should be “discounted” when considering avoided
9 outages, as customers who are on battery backup power are not experiencing an outage.
10 From the customer experience perspective, they are not living through an outage because
11 their power stays on seamlessly. These storage solutions function similarly to feeder
12 back-ups and self-healing circuits—except much more quickly. Both Mr. Mara and Mr.
13 Jordan state that storage cannot prevent outages, but only mitigate them while still
14 requiring repairs to the distribution system. So too is the case for many traditional
15 resiliency techniques. In the feeder backup example, there is still a fault on the first line
16 that requires repair before normal operation resumes. That is not currently reflected as an
17 outage in reliability metrics, appropriately because the customers on the feeder backup
18 remain powered up.

19 Storage is a tool that brings a similar resiliency benefit—perhaps uniquely so—to
20 the area of the grid that is otherwise difficult to harden and does not have the same
21 opportunity to have system redundancy in the poles and wires necessary to provide this

1 quality of service. And it importantly provides broader grid benefits compared with more
2 traditional resiliency techniques. In the rural and remote Zone 4 locations we are
3 targeting in the first phase of ZOI, customer storage is the most efficient way to achieve
4 this goal due to the remote infrastructure and lack of customer density.

5 Given the design that GMP is employing for these customer storage systems,
6 which provide the amount of storage necessary for whole home backup, it is not
7 appropriate to discount storage-avoided outage events. In addition, as Mr. Jordan notes,
8 his proposed approach would be difficult to measure and implement because it would be
9 very specific and subjective to the individual customers.⁴ Instead, success should be
10 measured by keeping customers on—we can show that customers with storage systems
11 will experience a seamless transition to the battery and have their entire home backed up
12 for the outage event when coupled with the full circuit ZOI program.

13 **Q11. Can you describe in more detail how GMP’s typical storage solutions provide**
14 **resiliency and deliver on the ZOI goal of avoiding such outages?**

15 A11. Yes. A standard installation in GMP’s current ESS battery program is two Tesla
16 Powerwall 2’s equating to 27kWh and 10kW of continuous power, and we will use the
17 same system in ZOI. The system can peak to 14kW instantaneous power. The battery
18 systems, once installed, engage automatically and seamlessly within milliseconds of an
19 outage event. The customer average monthly kWh consumption is 600 kWh, or around
20 20 kWh per day, meaning a standard ESS installation will provide over 24 hours of

⁴ See Prefiled Direct Testimony of Bill Jordan at 15.

1 backup without customers managing their usage, which they often do to extend the
2 backup duration.

3 I note that Mr. Mara’s analysis of the ZOI storage proposal is based on an
4 incorrect understanding of these whole-home systems. Mr. Mara describes a system
5 based around a single battery providing 13 kWh and only a 5.76 kW peak output.⁵ Mr.
6 Mara’s conclusions regarding the batteries’ ability to meet load and storage requirements
7 (e.g. “because the peak capacity is relatively low (5.76 kW), it is necessary to control and
8 manage the appliances to be fed by the battery”), must be viewed in that context, which is
9 not consistent with the properly-sized and proven whole-home backup installations that
10 we are currently doing and have done for many years. Indeed, Mr. Mara’s review of the
11 data indicated that the 27kWh capacity provides a highly-effective backup—only 3% of
12 outage events he reviewed exceeded 13 kWh used, dropping to 1% when limited to
13 events of less than 8 hours.⁶

14 Once in use, GMP manages the batteries for grid and power supply services, so
15 they remain available to the customer for their primary resiliency function. For example,
16 we do not call on the batteries for discharges when weather is anticipated that could cause
17 outages, to ensure customers have the full capacity available when needed.

18 As a result, our battery installations support customers’ needs during an outage
19 for quite some time, as the data shows. Not only is the system sized to meet these needs,
20 but our customer experience also tells us they provide ample power and energy. And

⁵ See Mara pf. at 21, 23.

⁶ See Mara pf. at 24.

1 because our ZOI approach is a comprehensive solution for the entire circuit, reliability
2 will be higher and restoration quicker, which in turn requires less battery backup time.

3 **Q12. Turning to C&I customers, Mr. Mara and Mr. Jordan identify that the current ZOI**
4 **plans do not include storage for this customer class. How do you respond?**

5 A12. The Department witnesses are correct that C&I storage is not a focus in this first phase of
6 the ZOI. Rather our focus on storage investments is in the most rural zones where
7 dispersed residential scale storage can provide resiliency more effectively than hardening
8 and other traditional solutions. Moreover, the focus of this initial investment will be in
9 the most impacted and vulnerable circuits first, which also are typically rural with steeper
10 slopes and heavier forest canopy.

11 Generally, C&I customers are located near the main line, or what we are calling
12 Zone 1, often on three-phase lines—especially when talking about larger load customers
13 referenced by Mr. Mara and Mr. Jordan. On these lines, storage would generally not be
14 the solution outside of a specific use-case for larger-scale storage or a resiliency zone,
15 and line hardening will provide increased reliability for these customers instead. The
16 backbone mainline feeders are a priority early in the ZOI because keeping these lines
17 operating reduces outages for all downstream customers on the feeder. After our initial
18 phase of the ZOI deployment, we anticipate the need will arise to utilize storage for C&I
19 customers in certain instances and this can be handled through traditional battery storage
20 and may also be covered with mobile storage or even vehicles (such as fleet vehicles) that
21 can provide vehicle-to-load backup capabilities.

1 **Q13. The Department’s witnesses, Mr. Jordan and Mr. Mara, discuss concerns**
2 **regarding customer usage and storage management during grid outages. How do**
3 **you respond?**

4 A13. Their conclusions again are not consistent with the storage installations we will
5 accomplish in the ZOI. The standard battery installation can support the entire load of a
6 given home and both the system and supporting management applications are designed to
7 keep customers informed about remaining energy so they can make choices about energy
8 usage during an outage event. Our experience through many years of our successful
9 battery programs is that customers know how to manage the systems to best serve their
10 needs, and that they appreciate the safety and flexibility the systems provide—
11 particularly when compared to having no power during an outage.

12 As described in detail in our discovery responses to DPS questions on this topic,
13 at the time of installation, customers are shown how to use the app associated with the
14 battery, which will show them the amount of energy left in the system during an outage.
15 This allows customers to actively view and manage their energy uses during outage
16 events and both GMP and installers provide information on how to extend the duration of
17 the backup power provided by the battery systems. And as noted, GMP also reaches out
18 to customers before storms so they know when and how the storm is forecasted to hit so
19 they can best manage their usage.

20 It is important to note that while storage customers might opt to limit less
21 essential devices like dehumidifiers for a short period of time, in practice, most common
22 appliances do not need to be limited at all. In terms of capacity, as described previously,

1 the systems can generally provide whole home back up for 24 hours without limiting
2 consumption, and for far longer if customers take small steps to conserve. Therefore,
3 customer storage is highly effective—and already demonstrated—to provide a zero-
4 outage experience from the customer perspective. And again, the duration needed for
5 backup will be greatly reduced when the circuit ZOI work is completed.

III. Response to Department Testimony Regarding Storage Performance and Reporting

6 **Q14. Turning to Department testimony regarding the performance of existing storage**
7 **installations, Mr. Mara testified that GMP’s existing residential storage does not**
8 **provide power during outages approximately 5% of the time. Is this correct?**

9 A14. No, that is not correct. The data that Mr. Mara reviewed contained entries where a battery
10 was listed as outputting no power during outage events, but these do not necessarily mean
11 the battery was not supporting the home during that time. And our regular interactions
12 with customers give us confidence that these data entries do not actually reflect situations
13 where the battery is not delivering power during outages.

14 When asked in discovery,⁷ we explained that the raw export of battery data
15 requested would underreport output during an outage due to several factors, including
16 solar generation covering the load, or communications being lost. Mr. Mara instead
17 incorrectly assumed that these events reflected a battery failing to discharge.

⁷ See A.DPS.GMP.2.97(d)

1 We have since reviewed the data provided to Mr. Mara against actual outage data
2 and have not found an occasion where a battery did not respond during an outage.
3 Instead, most of the events Mr. Mara identifies are a result of the customer location being
4 logged as part of an outage the customer did not actually experience. In these events, an
5 outage would be reported near the customer's location—usually at the nearest upstream
6 protective device—but not actually involving the customer or requiring battery backup.
7 For example, an outage downstream of the customer location might be detected by an
8 upstream protective device in the outage management system; however, the customer
9 would still have power. The protective device reporting the outage could create an outage
10 report for the full line segment, including the customer location data. At the same time
11 the battery would not log any output, leading to what Mr. Mara noted. This was a
12 limitation of the very extensive raw data Mr. Mara requested. When GMP reviews this
13 data for reporting Service Quality and the Rule 4.900 annual report, these non-outage
14 events are not included.

15 In addition to our review of the data, we know that these scenarios are responsible
16 for the data Mr. Mara highlights because we are in regular communication with storage
17 customers, and it is extremely rare to hear of a battery not responding when needed or not
18 being available for backup. These batteries perform and are available to customers to
19 keep them connected.

1 **Q15. What is your opinion of Mr. Mara’s suggested reporting index on the percentage of**
2 **batteries failing to start (“BFSTI”)?**

3 A15. As described further in Mr. Burke’s testimony, GMP has proposed several metrics to
4 track and report on ZOI project work including the number of battery installations for the
5 ZOI by circuit. The metric Mr. Mara proposes would not help measure the success of
6 these installations. As described above, Mr. Mara’s assumption that GMP’s existing
7 batteries fail to start 5% of the time is incorrect and does not reflect actual experience
8 with these systems for customers. There is no indication of that, so the metric proposed
9 would not help the Commission track customer battery performance as a part of the ZOI.

10 **Q16. What storage system reporting related to the ZOI does GMP propose instead?**

11 A16. We will track annually the actual installations by program type. We already track ESS
12 and BYOD in our annual regulation plan reporting, and we propose to add the number of
13 ZOI installations by circuit each year. To show how these installations directly support
14 equity, we will report on the number of ZOI installations that support a customer on our
15 critical care list or enrolled in our EAP. In addition, we propose to report the average
16 SAIFI/CAIDI metrics for customers with storage on each circuit. Overall, we will also
17 continue to track the other storage reporting metrics we utilize for our annual regulation
18 plan.⁸ The sample reporting template is included as **Exhibit GMP-MB-17**, as described
19 further by Mr. Burke.

⁸ For example, we expect overall battery performance for peak shaving to continue to be reported across our fleet.

1 **Q17. How will these reports show the success of the installations GMP accomplishes for**
2 **the ZOI and the broader benefits of storage for the grid and customers?**

3 A17. We will see a tremendous increase in the number of customers who have access to the
4 individual safety and security that storage systems provide, while bolstering this key grid
5 asset that helps lower costs for all customers over time. Phase 1 will reach approximately
6 1,400 Zone 4 customers, mostly in the rural areas of southern and central Vermont where
7 the greatest impacts from climate-change driven storms have occurred. The proposed ZOI
8 will give these customers storage systems as a core part of their utility service. This
9 means they can experience the same overall level of reliable service as customers in more
10 urban parts of our territory experience.

11 What makes storage a real benefit to all is the flexibility it provides to the overall
12 energy system, especially one that is actively undergoing a transition both with the
13 decentralization of generation and increased electrification of heating, transportation, and
14 commercial and industrial processes.

15 The ZOI storage systems will cover the majority of their cost over their life, even
16 without taking into account the individual resilience benefit they will create. The
17 importance of that to customers cannot be overstated—with today’s medical technology,
18 work from home, and ways of connecting with the larger world, customers’ safety and
19 quality of life depend upon extremely reliable electric service. Even the strongest system
20 will continue to see impacts at times from extreme weather and other events and
21 hardening the physical grid against any such incidents, even if possible, would be
22 extremely costly. On-demand customer storage instead can serve customers in

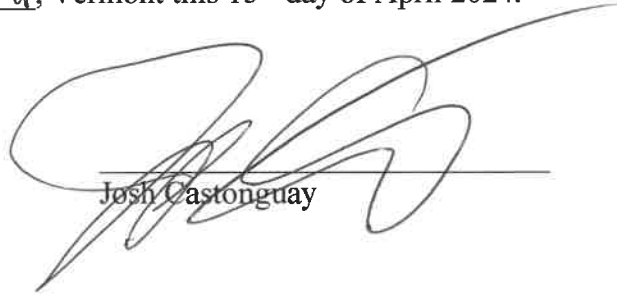
1 conjunction with investments in undergrounding and storm hardening, creating a
2 resilient, flexible, stronger grid for all GMP customers.

3 **Q18. Does that conclude your testimony?**

4 A18. Yes, it does.

I, Josh Castonguay, declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Colchester, Vermont this 15th day of April 2024.



Josh Castonguay