

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 18-1633-PET

Petition of Green Mountain Power for approval)
of a multi-year regulation plan pursuant to 30)
V.S.A. §§ 209, 218, and 218d)

**PREFILED REBUTTAL TESTIMONY OF
MARY G. POWELL
ON BEHALF OF GREEN MOUNTAIN POWER**

February 4, 2019

Summary of Testimony

Mary Powell provides an overview of GMP’s rebuttal testimony related to the proposed Multi-Year Regulation Plan (“MYRP” or the “Plan”), including GMP’s response to comments provided by the Department of Public Service (“DPS” or the “Department”) and Renewable Energy Vermont (“REV”). Ms. Powell highlights the parties’ shared goals for the Plan to foster innovation and strong company performance for customers while creating a more simple, transparent, and stable rate path. She describes how GMP proposes to revise its Plan to address comments from other parties and to further address the challenges of climate change, and why the changes GMP proposes are designed to deliver on our commitment to the Vermonters we serve.

EXHIBIT LIST

GMP-MGP-1 (Rev.)	Updated Multi-Year Plan Major Elements Summary
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**PREFILED REBUTTAL TESTIMONY OF
MARY G. POWELL
ON BEHALF OF GREEN MOUNTAIN POWER**

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

2 A1. My name is Mary Grace Powell, and I am the CEO of Green Mountain Power
3 Corporation.

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

5 A2. Yes, I provided prefiled direct testimony in this proceeding dated June 4, 2018.

6 **Q3. What is the purpose of your testimony?**

7 A3. The purpose of my testimony is to provide an overview of GMP's rebuttal position in this
8 proceeding, and provide further context for the proposals and changes GMP has made to
9 its Multi-Year Regulation Plan in response to the testimony of other parties in this
10 proceeding, including the Department and REV. Underpinning all of these proposals is
11 our strong focus on ensuring the Plan will support our efforts to tackle climate change
12 and to provide innovation for our customers through cutting carbon.

13 **Q4. Do you have a general response to DPS's and REV's testimony?**

14 A4. Yes. I appreciate both Department's and REV's perspectives on the design and
15 implementation of a multi-year regulation plan and I am encouraged by the broad areas of
16 agreement I see as we all work to serve Vermonters in this time of rapid energy
17 transformation and climate change. All of us support adoption of a regulation plan, and

1 while there are some differences on the specific design of components we have proposed,
2 it is clear that all of us share several important goals. We all seek a Plan that will benefit
3 customers and help us achieve our state's climate, renewable, and other energy goals, and
4 we recognize that this Plan can provide a valuable tool for encouraging innovation and
5 energy transformation in a more efficient way compared to traditional protracted annual
6 cost of service filings. We also share a desire to create a Plan that is as simple and
7 transparent as possible, balancing the desire for certainty in anticipated costs over the life
8 of the Plan with the need for flexibility to confront the rapidly changing energy landscape
9 we all face. And to succeed, we all recognize that GMP needs to help accelerate our
10 state's adoption of cost-effective, reliable, innovative measures that limit the financial
11 and environmental impacts of climate change. This necessarily includes partnerships
12 with our customers to create more home-, business-, and community-based energy
13 systems, as well as with third-parties in the energy space that can leverage the tools and
14 resources GMP can provide so that together we can seize the opportunities before us and
15 best serve Vermonters.

16 The Plan we proposed last June was designed to achieve these common goals, and
17 we welcome DPS and REV's input to help us improve it. We said in our opening
18 testimony that we welcomed feedback and ideas, and we hope our rebuttal testimony
19 shows that we have taken a great deal of what the parties have offered to heart. The rest
20 of our rebuttal testimony outlines the changes we have made to address individual
21 recommendations provided by DPS and REV, along with other changes that we feel we
22 must propose to face head-on the challenge of climate change and the cost impacts in

1 front of us. I believe our revised Plan strikes the right balance for our customers by
2 providing mechanisms that are simple to implement, encourage cost efficiency, provide
3 as much certainty as possible for our customers, and offer the flexibility necessary to
4 continue our transformative efforts and confront the real and increasing threats posed by
5 climate change.

6 **Q5. Can you summarize GMP's rebuttal position and explain how GMP's testimony is**
7 **organized?**

8 A5. Yes. Below is an overview of our rebuttal filing, with reference to each witness and the
9 issues they cover. I have also attached a revised version of my original exhibit, which
10 summarizes the major components of our revised Plan, noting the primary changes from
11 our initial proposal. *See Exhibit-GMP-MP-1 (Rev.).*

12 • **Eddie Ryan**, our Controller, responds to the DPS's comments on the Plan
13 regarding financial and rate-setting issues, and outlines GMP's proposed resolution of
14 DPS's recommendations. He notes that DPS and GMP largely agree on key components
15 of the Plan. Mr. Ryan then addresses the Department's recommendation that the Public
16 Utility Commission ("PUC" or the "Commission") adopt a comprehensive I-X formula
17 instead of the framework GMP proposed. This is the primary difference between our
18 position and the Department's. He explains why the Department's formula approach is
19 not in customers' best interest at this time, given its complexity and the other regulatory
20 obligations and circumstances facing GMP. Recognizing the goals of simplicity,
21 transparency, and stability the Department shares, Mr. Ryan offers improvements to
22 GMP's Plan designed to satisfy the Department's recommendations. Specifically, we

1 propose to lock not only base capital spending as previously described, but also to lock
2 other non-power costs based on the three-year forecast reviewed at the beginning of the
3 Plan. We also propose to use a rate smoothing adjustor during the Plan period to create a
4 more stable, predictable base rate path during the Plan period. In addition, Mr. Ryan
5 addresses several changed circumstances that have occurred since we filed the Plan in
6 June of 2018, all climate change-driven, including changes to the exogenous change
7 Major Storm collections, the addition of a new Emerald Ash Borer Adjustor to
8 proactively address this newly-discovered aggressive infestation in Vermont, and the
9 ability to file for approval of a Climate Resiliency Plan, as I discuss further below. He
10 also provides GMP's response to DPS's recommendations on other features of the Plan,
11 such as the ESAM sharing bands.

12 • **Doug Smith**, our Chief Power Supply Executive, addresses the Department's
13 recommendations for changes to the Power Supply Adjustor. He explains why the
14 Department's proposal for moving some categories of costs out of the PSA and into base
15 rates does not meet the criteria they offer to justify the move. He believes there is no
16 compelling reason for the changes the Department seeks because they ultimately create a
17 more complex process that will not yield material benefit for customers. He also explains
18 why the PSA should continue to use a symmetrical dead-band for addressing variances in
19 power costs, consistent with the way the PSA has historically been implemented over the
20 past 10 years. Mr. Smith finally addresses some inaccurate claims in REV's testimony
21 regarding the change in GMP's power supply costs over the past five years.

1 • **Brian Otley**, our Senior Vice President and Chief Operating Officer, describes
2 GMP’s updated proposal for the specific performance metrics that should be tracked over
3 the term of the Plan, taking into account both DPS and REV’s recommendations for
4 revisions to these measures. The list of performance metrics we propose is lengthy, but
5 also exciting. It shows the significant alignment between these diverse parties to achieve
6 a better energy future for Vermonters.

7 • **Josh Castonguay**, our Vice President, Chief Innovation Executive, responds to
8 the Department and REV’s recommended changes to GMP’s Innovative Pilot program.
9 He explains that GMP accepts the Department’s proposal to require GMP to seek PUC
10 approval for any individual pilot program that is anticipated to exceed \$5 million. He
11 also explains that while we disagree with REV’s perspective on GMP’s role in pursuing
12 innovative programs, we believe there are some reasonable changes in the Plan that
13 would facilitate greater coordination with REV, and would provide greater opportunity
14 for third-party partnerships, both of which we welcome.

15 • **James Coyne**, an expert with Concentric Energy Advisors, Inc., provides further
16 background on the challenges presented by the Department’s proposal to apply a
17 comprehensive I-X formula for setting our base rates. He explains why the methodology
18 proposed by the Department is neither simple nor transparent. It is, in his opinion,
19 generally out of step with current best practices for regulation plan design. Mr. Coyne
20 also responds to the Department’s proposed mechanism for Return on Equity (“ROE”)
21 adjustments, and explains why the methodology recommended by GMP produces less
22 volatile results that tend to track market conditions better.

1 **Q6. How does GMP respond to REV's recommendations in this proceeding?**

2 A6. Generally speaking, REV's comments focus on specific aspects of the Plan relevant to
3 the interests of its developer and energy services company members—namely the manner
4 in which GMP pursues energy transformation projects in Vermont, and the opportunities
5 for third-party energy service companies to participate in these transformation efforts. As
6 noted above, GMP shares the goal of advancing this transformation work together with
7 other third-party providers, and doing it in a way that is cost-effective, cuts carbon, and
8 benefits our customers. There is much work to be done in this area. The type of radical
9 transformation we seek requires more partners than ever, and we know we can
10 accomplish more on behalf of customers through strategic collaboration.

11 As described further in Mr. Castonguay's testimony, we are open to, and in fact
12 are already actively pursuing, additional opportunities to partner with third-party
13 providers in Vermont to help us accelerate the type of innovative energy services our
14 customers want and need. We also welcome the chance to collaborate more closely and
15 directly with REV in the development of our pilot programs. We already consult with
16 REV and its members often as projects emerge, and have started to deepen this
17 relationship through recent meetings regarding our pilot designs and other opportunities.
18 We're open to incorporating REV consultation more formally into the pilot program. All
19 of those steps make perfect sense, and are consistent with our effort to help develop a
20 new, more innovative, cost-effective, low-carbon energy system here in Vermont, which
21 will undoubtedly require focused, collaborative effort among all stakeholders as we all
22 move quickly to deliver results for our customers.

1 **Q7. Are there aspects of REV’s testimony that raise concerns for you?**

2 A7. Yes. After reading REV’s testimony, I am concerned that the vision I outlined above for
3 collaboration and partnership between GMP and REV’s members is not fully embraced
4 by REV. In particular, I was discouraged, frankly, by the narrow view REV’s witnesses
5 offer of GMP’s role in advancing innovation here in Vermont. They suggest in several
6 places that GMP should leave the development and implementation of innovative energy
7 services and programs to REV’s private, for-profit members, focusing only on our “core”
8 distribution business. I fundamentally disagree with this perspective of GMP’s “core”
9 business, and the related narrow view of GMP’s obligations and responsibilities to our
10 customers. It is exactly this old-world, traditional view of utilities that has led to the
11 current crisis in our industry. When utilities fail to innovate, costs for customers
12 increase.

13 As I explained in my opening testimony in this proceeding, I view our leadership
14 in transforming the energy sector for our customers as one of our most important
15 responsibilities. This work is not ancillary to, or outside of our “core” responsibility to
16 our customers—rather it is central to that responsibility. This is consistent with the
17 legislative mandate in the Renewable Energy Standard statute and also with the State’s
18 Comprehensive Energy Plan. We must pursue every reasonable opportunity to improve
19 the reliability of our system while driving down costs. We will continue to lean into this
20 innovative work, and GMP will always look for new opportunities to produce benefits for
21 our customers, while advancing Vermont’s energy goals for a low-carbon, low-cost
22 energy system. We hope to do this by spurring market demand that can be met by

1 partners who can leverage our systems, so that we can collectively take advantage of the
2 opportunities before us—for the benefit of all of our customers, not just those who can
3 afford to invest their own capital in individual systems.

4 **Q8. How do you respond to REV’s concerns regarding GMP’s participation in**
5 **innovative services?**

6 A8. I am concerned that REV’s perspective ignores the critical role GMP has played in
7 advancing and developing the very markets that have benefited and will continue to
8 benefit both REV’s members, and our customers, in the future. GMP helped pioneer the
9 design of net-metering here in Vermont, offering the first solar adder in order to spur
10 home and business based local renewable projects. Our program served as the model that
11 was ultimately adopted state-wide by the legislature, and which undoubtedly kick-started
12 the rapid growth of this market in Vermont. We are proud of the role we played there—
13 the solar adder was a necessary and important step at that time, tailored to help advance
14 more low-carbon, cost-effective energy sources for our customers, and it created
15 opportunities for many member REV businesses. Similarly, GMP’s early focus on, and
16 education related to, cold climate heat pumps lead to the development of a market here in
17 Vermont for those systems that is now largely dominated by third-party sellers and
18 installers.

19 We see the same cycle of initial utility development, followed by greater third-
20 party offerings and implementation, occurring in the new home energy storage markets.
21 REV critiques the structure of GMP’s battery storage programs in their testimony, but the
22 truth is that there was no meaningful market for home energy storage solutions in

1 Vermont prior to GMP's efforts to launch this market with our Powerwall program. Our
2 efforts to develop this market with Tesla, a well-known third-party provider, have helped
3 focus public attention on these opportunities and have provided education on storage to
4 create broader consumer interest. It also allowed us to develop the internal utility
5 platforms needed to understand the management of these systems and expand the offering
6 to other third parties. We don't view any of this work as undermining an existing
7 competitive market place—quite to the contrary, we played an instrumental role in
8 creating the marketplace which is helping third parties now sell storage to Vermonters.
9 All of this work is critical in my view if we are to successfully confront the real
10 challenges and threats posed by climate change, which continue to impose increased
11 costs on customers.

12 **Q9. Do you have a general response to the Department's recommendations regarding**
13 **GMP's Plan?**

14 A9. I am glad to see many areas of agreement between the Department and GMP on the goals
15 and provisions of the Plan. I think the Commission's proceeding on the future of
16 regulation, along with the pitfalls in traditional rate regulation we have seen while
17 litigating the last two rate cases, helped us define common ground. GMP's other
18 witnesses point out concerns we have with the Department's specific recommendation to
19 adopt a comprehensive I-X formula approach to base rates. Perhaps the greatest concern
20 I have about shifting to such a plan at this time is that it threatens to divert us from the
21 course we are on now to implement and expand innovative strategies that reduce costs for
22 customers, while delivering the strong merger commitments we made to customers. The

1 complexities and uncertainties presented by the Department’s recommendation do not
2 seem to fit the goals of simplicity and transparency we share with the Department. We
3 have stretched in this rebuttal to formulate changes to our Plan that will meet the
4 Department’s concerns by providing greater certainty for customers without putting us in
5 the middle of new problems and complexities that threaten to artificially dampen our
6 progress.

7 **Q10. As you consider how the Plan would affect GMP and its customers over the**
8 **proposed three-year period, what are your greatest areas of focus or concern?**

9 A10. I think back to the conversation we had with the Commission and its staff at the
10 workshop last summer. At that hearing, I noted that the constrained base capital spending
11 proposed in this Plan gives me, and my whole team, anxiety because of the many
12 important upgrades and resiliency improvements that are needed.¹ Mr. Otley, who leads
13 our capital team, also highlighted his concern about the project investment tradeoffs that
14 GMP may have to make, especially in this time of more frequent and ferocious storms.²
15 These discussions in various ways concerned the same central issue: how can GMP keep
16 our “traditional” transmission and distribution (“T&D”) system healthy and reliable for
17 customers, at a price they can afford, while also transforming as rapidly as possible to a
18 smarter, more distributed grid supported by more local-, home-, and community-based
19 renewable energy?

¹ Case No. 18-1633-PET, Transcript (Tr.) at 7:1-9:25 and 12:10-13:20 (8/3/18).

² Case No. 18-1633-PET, Tr. at 29:6-31:12 (8/3/18).

1 Just a few months later, our team was completing GMP’s 2018 Integrated
2 Resource Plan—setting forth our best thinking on exactly this topic—when we were hit
3 with the fourth most costly storm in our company’s history. The weather at the end of
4 November may not even have seemed remarkable to the average Vermonter, given the
5 storms we’ve experienced in the last few years, but it caused Vermont to seek a disaster
6 declaration for five counties and it cost GMP customers nearly \$12 million—doubling in
7 one fell swoop our major storm costs for the year. The irony was not lost on me that at
8 exactly the same time as we were writing out our orderly plans to address infrastructure,
9 planning and innovation in the next several years, Mother Nature was providing her
10 feedback: we need to do more.

11 Coming out of that storm, we challenged ourselves to rethink our assumptions,
12 and we are now in the process of evaluating the need for a comprehensive Climate
13 Resiliency Plan (“CRP”) that would focus directly on further storm hardening of GMP’s
14 transmission and distribution system. GMP is not proposing that the Plan be incorporated
15 into the MYRP at this time, but we believe that it may be prudent to seek review and
16 approval of such a resiliency plan from the Commission during the term of the Plan and
17 so have proposed a mechanism to allow that. One need only look at examples around the
18 country of devastating storm damage to realize that accelerating this targeted planning
19 really should not wait for the next rate case or regulation plan cycle. We need as much
20 innovation in this area as we have been applying to the rise of distributed energy in
21 Vermont.

1 **Q11. In your opening testimony, you spoke about the concerns you have with the**
2 **increasing costs of climate change in Vermont and the impact climate change is**
3 **having on GMP customers. Are there additional facts or circumstances that you**
4 **can share about these costs since the MYRP was filed in June of 2018?**

5 A11. Yes, there are. As I mentioned, as a result of the November 2018 storm, our annual
6 uncollected major storm costs jumped from approximately \$12 million to nearly \$24
7 million. Figuring out how to collect these costs in a sustainable, affordable manner
8 during the term of the Plan is a significant challenge. As a result of these increasing
9 costs, GMP has revised its original proposal for the collection of major storm costs under
10 the MYRP. Mr. Ryan describes this adjustment further. This storm is yet another “major
11 storm” in a series of more frequent and severe storms driven by climate change, and as
12 these costs mount, we are continuing to evaluate how we can best mitigate the increased
13 impacts of these events on customers, from both a reliability and a cost perspective.

14 **Q12. Can you provide some other specific examples of these climate change impacts on**
15 **GMP’s T&D system?**

16 A12. Yes. As Vermont’s weather patterns continue to shift due to climate change, GMP is
17 facing more frequent and more severe impacts to its T&D infrastructure. Simply stated,
18 the two major effects of climate change in Vermont are warming temperatures (in
19 summer, and even more so in winter) and increasing precipitation levels. Both of these
20 effects contribute to an increase in the frequency and the severity of the types of weather
21 events that have the most damaging impact to GMP’s T&D infrastructure. These weather
22 events include severe thunderstorms with embedded high winds, gradient wind events,

1 high-water-content snow events, and freezing rain/ice events. These types of storms and
2 events create high winds and heavy weights on trees and T&D lines, causing severe
3 damage and outages to system infrastructure. Notably, a lot of the damage that we are
4 seeing to our T&D infrastructure are from trees falling from well outside of our right of
5 way. Three of GMP's largest severe weather events ever (in terms of the number of
6 customers impacted) have occurred since December 2014, and forecasters predict this
7 trend to accelerate.

8 In December 2014, Vermont was hit with a statewide snowstorm, which dumped
9 a blanket of high-water-content snow (meaning snow that is very heavy, wet, and sticky)
10 that sat cement-like on trees and lines for days. Almost 150,000 GMP customers lost
11 power, with nearly 40,000 people without power at the peak of the event. Power was
12 restored over an eight-day period, and the restoration costs of this event were \$17.5
13 million.

14 On Halloween 2017, a severe gradient wind event swept through Vermont,
15 bringing wind gusts of 115 miles per hour to the ridgelines of the Green Mountains and
16 80-mile-per-hour gusts down to the valleys. Weather forecasters did not predict this
17 event to reach wind speeds anywhere near these levels. Almost 125,000 GMP customers
18 had power restored over a five-day period, 81,000 of which were without power at the
19 peak of the event. The restoration costs of this event were almost \$8 million.

20 The late November 2018 storm mentioned above provides yet another example.
21 It was another high-water-content snow event that blanketed Vermont with a heavy, wet
22 snow load that caused significant electrical infrastructure impacts. Almost 115,000 GMP

1 customers were impacted during this event, with a peak outage of 52,000 customers.

2 GMP was not alone in experiencing these weather impacts. During these events, nearly
3 all of Vermont's distribution utilities were impacted and coordinated to restore power to
4 electrical customers over an extended period. The restoration costs of this event for GMP
5 were \$12 million.

6 In between these major events is a running list of smaller weather events that have
7 resulted in GMP and the other Vermont utilities consistently needing to repair damage to
8 T&D infrastructure. Isolated damage from wind, thunderstorm, and icing events is a
9 constant aspect of GMP's operations, but one that is becoming increasingly more time
10 consuming and expensive. Our analysis of weather trends in Vermont and nationally
11 indicates that these events are likely to just continue increasing.

12 **Q13. Are there other climate specific impacts that are driving greater costs for GMP**
13 **customers?**

14 A13. Yes. In addition to major storm costs, non-storm climate change impacts to Vermont are
15 also causing new threats to our operating environment, such as the Emerald Ash Borer
16 ("EAB"), an invasive insect that kills ash trees. Due to warming temperatures, the
17 presence of the EAB has moved northward, arriving in Vermont for the first time just
18 recently. Once infested, the EAB has a 99% kill rate on ash trees and is expected to have
19 significant impact in Vermont over the next years. We have many, many ash trees in our
20 corridors—a survey showed that they are about 10% of the trees along GMP's rights-of-
21 way. As these trees are infested and killed by the EAB, they will fall over and will have
22 a significant impact on the safety and reliability of electrical infrastructure. As described

1 further in Mr. Ryan's testimony, GMP will be proposing a new targeted adjustor
2 mechanism in the MYRP to cover the anticipated costs associated with this infestation,
3 which we presently project at \$1.2M per year, but could accelerate if the spread of EAB
4 advances faster. I make this point about the EAB simply to further illustrate that climate
5 change impacts are real, are being felt now, and are expected to accelerate in the years
6 ahead.

7 **Q14. What options is the Company considering for additional climate-change related**
8 **storm mitigation and hardening?**

9 A14. In addition to the existing T&D maintenance and storm-hardening work we expect to
10 complete during the term of the Plan, GMP is starting the process of analyzing the need
11 for a more specific and robust Climate Resiliency Plan, in order to accelerate our efforts
12 to address these impacts on our T&D system. We are in the initial phase of evaluating
13 what this plan would look like, taking into account best practices, information from past
14 storm-hardening projects, least cost alternatives, and the overall costs and benefits of
15 relative options. Although we do not have a specific proposal for the Commission at this
16 time, we would ask for a provision in the MYRP providing GMP an opportunity to file
17 such a plan, subject to PUC review and approval, within the plan period. This plan
18 would likely involve capital spending targeted at increased storm hardening as well as
19 newer techniques, such as strategic undergrounding, along with additional O&M
20 expenses for corridor maintenance and targeted non-poles and wires alternatives where
21 appropriate. We raise this issue now because it is likely that we cannot wait until the end

1 of the Plan period to commence this work, and do not believe the work can be
2 accomplished within the established caps in the Plan.

3 This is particularly true because we have, as described in my opening testimony
4 and that of Mr. Otley, constrained base capital spending during the Plan period. The last
5 thing I want to see is our good efforts to reduce overall capital spending cost Vermonters
6 more down the road; rather than seek a higher base capital investment level in this
7 proceeding, we simply want to alert the Commission to the needs we perceive and gain
8 permission to bring them to the Commission for approval during the Plan period if
9 warranted. In the event that GMP proposes such a plan during the term of the MYRP, it
10 would be supported by analysis demonstrating why the additional expenditures are
11 necessary, appropriate, and in the best interests of customers.

12 Staying ahead of this issue is important for our customers, which is why we are
13 raising the issue now. Just in the past month we have seen a major utility go into
14 bankruptcy proceedings in what is being called the first “Climate Change bankruptcy.”
15 While the climate risks we face in Vermont are different than in some other states, they
16 are just as potentially significant. From where we sit, the biggest challenge we face is the
17 increasing severity of storms, particularly winter storms, which are warmer and wetter. It
18 will take continued, focused, and proactive measures to respond to these dramatic shifts
19 in weather caused by climate change so that our customers do not experience
20 substantially decreased reliability or rapidly escalating costs associated with changing
21 climate impacts. That is the goal of our work in this area.

1 **Q15. Are there any other thoughts you want to share with the Commission regarding this**
2 **Plan or the changes GMP proposes in this rebuttal testimony?**

3 A15. Only that, as is probably clear from the rest of my testimony, I am more convinced than
4 ever that all of these issues—a more resilient grid, a more renewable supply, a more local
5 energy system, a more affordable energy future for Vermonters—are closely intertwined
6 and require focused, directed, disciplined work to balance. That work will happen
7 through the greater collaboration and communication supported by this Plan, both in its
8 express performance metrics and in the processes utilized by the Commission for
9 reporting and monitoring our progress during its term. Traditional rate regulation, with
10 its retrospective framework, cannot hope to match that support. We welcome the chance
11 to work with the Commission, the Department, and other parties to implement a forward-
12 looking Plan that helps us deliver for our customers.

13 **Q16. Does that conclude your testimony today?**

14 A16. Yes, it does.