

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 22-0175-TF

Tariff filing of Green Mountain Power
requesting a 2.34% increase in base rates
effective on bills rendered on or after
October 1, 2022

Case No. 21-3707-PET

Petition of Green Mountain Power
Corporation for approval of a Multi-Year
Rate Plan (MYRP) pursuant to 30 V.S.A.
Sections 209, 218, and 218d

**PREFILED DIRECT TESTIMONY OF
CHRISTOPHER C. DAWSON
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE**

April 20, 2022

Summary: Mr. Dawson discusses the power supply aspects to Green Mountain Power Corporation's ("GMP" or "Company") rate plan on behalf of the Vermont Department of Public Service.

Mr. Dawson Sponsors the Following Exhibits:

Exhibit PSD-CCD-1

Professional Resume of Christopher C. Dawson

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

2 A1. My name is Christopher Dawson. I am a consultant with GDS Associates, Inc. (“GDS”).
3 My business address is GDS Associates, Inc., 1850 Parkway Place, Suite 800, Marietta,
4 GA 30067.

5 **Q2. Please describe your education and professional experience.**

6 A2. I have a Bachelor of Science in Industrial Engineering from the Georgia Institute of
7 Technology and a Master of Business Administration from Georgia State University. I
8 am also a registered Professional Engineer in the State of Georgia. I began working at
9 GDS in December of 1994, and my specific work experience includes integrated
10 resource planning, economic feasibility analyses of long-term and short-term power
11 supply alternatives, conducting solicitations and procurement of power supply
12 resources, contract negotiations, evaluating implications of Federal/State legislative and
13 regulatory proceedings, financial planning and operating budget projections, and
14 managing Regional Transmission Organization (“RTO”) market policy and operational
15 issues. My professional resume is included as Exhibit PSD-CCD-1.

16 **Q3. Have you testified in Vermont in the past?**

17 A3. Yes. I submitted testimony in Case No. 18-0974-TF before the Vermont Public Utility
18 Commission (“Commission”). That case involved GMP’s 2018 rate case.

19 **Q4. Have you testified before any other regulatory commissions?**

20 A4. Yes. Included in Exhibit PSD-CCD-1 is a list of regulatory proceedings in which I have
21 presented expert witness testimony.

1 **Q5. For whom are you appearing?**

2 A5. I am testifying on behalf of the Vermont Department of Public Service (“Department”).

3 **Q6. Were your testimony and exhibits prepared by you or under your direct**
4 **supervision and control?**

5 A6. Yes.

6 **Q7. Please summarize the purpose of your testimony.**

7 A7. I describe my review of GMP’s power supply modeling and costs pertinent to its Fiscal
8 Year 2023 Rate Case.

9 **Q8. Please describe the information from GMP you reviewed.**

10 A8. I reviewed the following GMP information:

- 11 • Relevant filed documents, testimonies, and schedules in GMP’s rate filing in
12 Case No. 22-0175-TF;
- 13 • GMP’s responses to the Department’s first round of discovery (“Discovery #1”),
14 including GMP’s power supply modeling files (Power Model made up of
15 Attachments GMP.DPS1.Q117.3-12) and GMP’s Annual Resource Report
16 required under Rule 5.200 (Attachment GMP.DPS1.Q122.1); and
- 17 • GMP’s responses to the Department’s second round of discovery (“Discovery
18 #2”).

1 **Q9. Please describe your involvement in GMP's prior rate case in Case No. 18-0974-**
2 **TF.**

3 A9. In Case No. 18-0974-TF, I performed a similar review of GMP's power supply modeling
4 and costs as in the current case. In that prior case, I submitted pre-filed direct testimony,
5 surrebuttal testimony, and participated in a hearing related to several issues, including
6 hedging procedures for energy, capacity, and renewable energy credits ("RECs"), joint
7 venture solar plus storage, and a residential battery pilot program. As a part of that
8 process, I conducted an extensive review of GMP's power supply arrangements,
9 modeling, and hedging programs.

10 **Q10. Did you review the same information in the current case?**

11 A10. Yes. I reviewed GMP's Power Supply Model which is in the same structure and format
12 as it was in the prior case.

13 **Q11. Did you review new information in this case as compared to the prior case?**

14 A11. Yes. As an outcome of the prior rate case, the Commission required that GMP provide
15 a report on its power supply hedging activities and discuss that with the Commission
16 and Department on an annual basis. As a part of the current case, I reviewed GMP's
17 reports regarding their hedging and procurement activities for energy, capacity, and
18 RECs.

19 **Q12. Do GMP's reports provide sufficient transparency and information regarding**
20 **their hedging and procurement activities for energy, capacity, and RECs?**

21 A12. Yes. Based on the reports that GMP has provided thus far, there is sufficient information
22 to understand GMP's procurement method and timing for managing its energy and

1 capacity requirements, as well as managing GMP's RECs and compliance under
2 Vermont's Renewable Energy Standard.

3 **Q13. Based on your review, are you recommending any power supply-related**
4 **adjustments?**

5 A13. No.

6 **Q14. Apart from any power supply-related adjustments, do you have any other**
7 **recommendations in this case?**

8 A14. In Case No. 18-0974-TF, I reviewed GMP's in-house proprietary spreadsheet energy
9 modeling tool and concluded that it was inadequate to effectively support and manage
10 GMP's dynamic power supply portfolio. I recommended that GMP improve its
11 analytical modeling capability for assessing future energy requirements, specifically,
12 utilization of hourly simulation models. Based upon my review of GMP's Power Supply
13 Model used in this case, it appears that GMP has not made any improvements in its
14 modeling capabilities. My recommendation in this case is the same as in 2018: GMP
15 should improve its analytical energy modeling tools to facilitate more granular data
16 analysis to support its energy hedging and procurement efforts.

17 **Q15. Does this conclude your direct testimony?**

18 A15. Yes.