

Smith & Duggan llp

attorneys at law

Two Center Plaza
Sixth Floor
Boston, MA 02108-1906
tel 617.228.4400
Fax 617.248.9320

Alan D. Mandl
Of Counsel
AMandl@SmithDuggan.com
direct dial: 617.228.4464
Lincoln Office

Lincoln North
55 Old Bedford Road
Lincoln, MA 01773-1125
tel 617.228.4400
fax 781.259.1112

July 14, 2010

BY OVERNIGHT MAIL

Luly Massaro
Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: RIPUC Docket No. 4185

Dear Luly:

Enclosed please find for filing in this matter an original and nine (9) copies of the Direct Testimony of Richard La Capra on behalf of the Town of New Shoreham.

Copies of this filing are being emailed to the Commission and the service list.

Do not hesitate to contact me if you have any questions concerning this filing. Thank you for your assistance.

Sincerely yours,

Alan D. Mandl, Bar No. 6590

Enclosures
cc: Service List

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

_____)
Review of Proposed Town of New Shoreham)
Project Pursuant to RI General Laws,)
§39-26.1-7)
_____)

DOCKET NO. 4185

DIRECT TESTIMONY OF RICHARD LA CAPRA

ON BEHALF OF

THE TOWN OF NEW SHOREHAM

July 15, 2010

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

3 A. My name is Richard La Capra. I am a consultant specializing in
4 energy and regulatory issues. My business address is 5 Carmine
5 Street, New York, New York 10014.

6 **Q. WOULD YOU PLEASE SUMMARIZE YOUR PROFESSIONAL
7 QUALIFICATIONS?**

8 A. Yes. I have been working in the areas of energy planning and
9 pricing for over thirty years. My experience includes professional
10 positions with the Pennsylvania-New Jersey- Maryland
11 Interconnection (“PJM”) and various utility service companies. In
12 1980, I formed La Capra Associates to bring specialized services to
13 managers and policy makers within the energy industry. In 2001, I
14 left the management of the company to pursue several interests in
15 the environmental and public policy areas of the industry. My
16 current resume is appended as to my testimony as RLC-1.

17
18 **Q. HAVE YOU TESTIFIED PREVIOUSLY IN DOCKET 4111?**

19 A. Yes, I filed Direct and Rebuttal testimony in Docket 4111 on behalf of the
20 Town of New Shoreham.

21

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
2 **PROCEEDING?**

3 A. My testimony will address three major areas of review which the
4 Commission will undertake pursuant to R.I.G.L. §39-26.1-7, as amended
5 in June 2010, associated with the economic and environmental benefits
6 of the proposed Town of New Shoreham Project amended PPA, from the
7 perspective of the Town.

8

9 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

10 A. My testimony puts forth three recommendations:
11 1) The Town strongly recommends that the Commission approve the
12 amended PPA as filed on or about June 30, 2010, between National Grid
13 and Deepwater Wind;
14 2) The Town also strongly supports the legislatively prescribed peak
15 allocation method for apportioning the cost of the submarine cable from
16 Block Island to the mainland, as described in R.I.G.L. §39-26.1-7((f); and
17 3) The Town recommends that, pursuant to R.I.G.L. §39-26.1-7((c) as part
18 of its review of the amended PPA, the Commission recognize the need for
19 an interconnection between the Block Island Power Company system and
20 the transmission cable from Block Island to the mainland. The Town of
21 New Shoreham Project will not meet all of the General Assembly's public
22 interest objectives or provide the Project's potential economic and

1 environmental benefits absent an interconnection from New Shoreham to
2 the mainland.

3

4 **II. RECOMMENDATION TO APPROVE THE AMENDED PPA**

5

6 **Q. WHAT IS THE BASIS OF THE TOWN'S RECOMMENDATION THAT**
7 **THE AMENDED PPA BE APPROVED?**

8 A. The General Assembly directed the Commission to consider whether the
9 Town of New Shoreham Project will provide economic and environmental
10 benefits and to evaluate the terms and conditions of the amended PPA in
11 light of the nature of the Project as a small offshore wind farm. The
12 amended PPA is one component of the Project, which also includes the
13 construction of a transmission cable. The transmission cable would allow
14 wind power to flow to the mainland and with an interconnection to Block
15 Island Power Company ("BIPCo"), enable BIPCo to purchase power from
16 the mainland. With a successful completion of the Project., the Town could
17 enjoy economic and environmental benefits. The economic benefits would
18 include the ability of BIPCo or any successor to buy power from mainland
19 sources and not be wholly dependent on diesel generation. Mainland
20 power would provide economies for Island customers in two ways; - first,
21 there would be a significant decrease in total fuel costs to serve the island
22 since the mainland average heat rate is approximately 8,100 BTU/kWh
23 while the BIPCo heat rate is about 10,400 BTU/kWh; second, the #2

1 distillate fuel oil which powers the island generators is more costly than
2 the marginal fuel in ISO-New England (usually natural gas)¹. Also, less
3 on-island generation capacity and fuel storage would be needed to serve
4 New Shoreham ratepayers, including the Town, which now have the
5 highest or near highest in the electricity rates in the country. The
6 combination of lower electricity costs, less land use dedicated to electric
7 utility use and less fuel storage and handling would all be positive factors
8 for the economy of the Island.

9
10 The environmental benefits are more clear both for the State and the
11 Island. Currently, on-island electricity production requires approximately
12 950,000 gallons of distillate fuel oil². If on-island diesels now operated by
13 BIPCo could be backed down as a result of the interconnection of the
14 BIPCo system to the Project, the proposed Project would dramatically
15 reduce this diesel consumption;- easily by 95+% since the only time the
16 diesel generation would be required is when both the wind generators and
17 undersea cable are out of service. As a result of eliminating most of the
18 on-island diesel generation and replacing it with mainland purchases,
19 New Shoreham would realize dramatic reductions in air emissions. For
20 example, the current emission differences between the BIPCo generation
21 versus ISO New England are:

¹ There will be, however, other island-specific generation expenses such as back up generators and higher losses which will reduce these fuel savings.

² An annual consumption of 949,268 gallons of fuel oil was reported by HDR Engineering in BIPCo's 2006 resource plan.

1
2
3 TYPICAL AVERAGE EMISSION VALUES
4 (lbs/MWh)
5

	<u>BIPCo</u> ³	<u>ISO-NE</u> ⁴
8 CO ₂	1,671	1,004
9 NO _x	32.3	0.28
10 SO ₂	10.3	0.57

11
12 In addition to actual consumption, fuel unloading and storage would be
13 drastically reduced as well as the handling and storage of other toxic
14 substances such as urea. Consequently, the Town can fully expect the
15 Project to bring economic and environmental benefits if interconnection to
16 the BIPCo system is constructed in a timely manner.
17

18 **Q. HAVE YOU EVALUATED THE AMENDED PPA IN TERMS OF OTHER**
19 **PILOT PROGRAMS OF A SIMILAR NATURE?**

20 **A.** No. As I testified in Docket No. 4111, the Town does not have the
21 resources to conduct an independent evaluation of amended PPA pricing
22 terms and conditions. The Commission may rely on evaluations provided
23 by other parties, which include National Grid, Deepwater and the Division.
24 In addition, the Town expects that longer term economic and
25 environmental benefits of the Project will be identified through advisory
26 opinions to be submitted to the Commission. However, long term
27 economic/employment benefits and greater reliance on renewable energy

³ Based on 950,00 gallons #2 fuel oil, 10,400 Heat Rate and US EIA Emission Factors

⁴ Based on "2007 New England Marginal Emission Rate Analysis"

1 sources for Rhode Island would have consequent benefits for both
2 mainland Rhode Island and New Shoreham .

3

4 **III. ALLOCATION OF TRANSMISSION CABLE PROJECT COSTS**

5

6 **Q. DOES THE TOWN SUPPORT THE ALLOCATION METHOD PUT**
7 **FORTH IN THE AMENDED STATUTE REGARDING TRANSMISSION**
8 **CABLE COSTS?**

9 A. Yes. The Town believes that the amended legislation has disposed of the
10 uncertainty about the method of allocation of the transmission cable costs.
11 The original legislation contained a vague, qualitative directive that the
12 customers of BIPCo or its successor should pay higher rates for the cable
13 than similar mainland customers. From this legislative directive, the Town
14 presumed that its allocation of cable costs would be disproportionate in
15 some undefined way. This, of course, was a source of uncertainty and
16 some apprehension for the Town since the economic benefits of the
17 Project could have been materially eroded. While the current legislation
18 does provide for a significant cost premium to island customers, it also
19 sets a quantifiable range from which the Town is able to fairly evaluate
20 economic benefits. Additionally, the method described in the current
21 legislation, relative contribution to peak load, is a broadly accepted
22 allocation for transmission and distribution costs. Consequently, the Town
23 sees the allocation as one which satisfies the legislative requirement, is

1 based on a long standing regulatory ratemaking principle and provides a
2 quantifiable basis for the allocation of transmission-related costs of the
3 Project.

4

5 **Q. HAS THE CURRENT LEGISLATION ALTERED YOUR**
6 **RECOMMENDATION FROM DOCKET 4111, IN WHICH YOU**
7 **RECOMMENDED THAT CABLE ALLOCATION METHODS WERE**
8 **PREMATURE AND SHOULD BE DEFFERRED?**

9 A. Yes, in Docket 4111, the Commission had a different standard of review
10 and the legislation left open the cable allocation issue. Also, neither
11 National Grid nor Deepwater proposed a cable allocation method for
12 Commission review and approval. Since it was unclear from the original
13 statute whether the Commission would consider transmission cost
14 allocation issues as part of its review of the PPA, the Town argued that
15 transmission cable cost allocation issues should be deferred and
16 considered separately from Commission review of the PPA. In the current
17 case, the amended PPA will be judged as a pilot or demonstration project
18 rather than as a large scale commercial project and the method for
19 allocation of the cable portion of the Project is defined in the amended
20 statute. Consequently, the Town believes that the allocation issue is
21 settled.

22

1 To the extent that the Federal Energy Regulatory Commission ("FERC")
2 considers the cable allocation, I would expect the parties to file an
3 allocation as set forth in the amended statute. Further, from my
4 experience, I do not see any conflict with the cable allocation method in
5 the legislation and traditional FERC methods for apportioning transmission
6 and distribution costs.

7

8 **IV. REVIEW OF THE ADEQUACY OF THE DELIVERY SYSTEM**

9

10 **Q. IS IT YOUR OPINION THAT A REVIEW AND EVALUATION OF THE**
11 **DELIVERY SYSTEM ON BLOCK ISLAND IS AN INTEGRAL PART OF**
12 **THE EVALUATION OF AMENDED PPA ECONOMIC AND**
13 **ENVIRONMENTAL BENEFITS FOR NEW SHOREHAM?**

14 A. Yes. Certainly the interconnection of the cable from the on-island National
15 Grid substation to the Block Island Power Company ("BIPCo") distribution
16 feeder station is an integral part of the Project. As I have testified, the
17 economic and environmental benefits of the Project for New Shoreham
18 depend upon this interconnection. In Docket 4111, National Grid provided
19 a one-line diagram in response to an interrogatory from the Division
20 (Division 4-1-4). The diagram, which I have appended as RLC-2, showed
21 the facilities associated with the Project and the ownership of specific
22 facilities by National Grid, Deepwater Wind and BIPCo. While there are
23 likely to be some alterations on the way to final design, the schematic

1 shows a reasonable division of plant, e.g., Deepwater's generators and
2 cable to the National Grid on-island substation, National Grid's on-island
3 substation and submarine cable to the Narragansett Electric mainland
4 distribution system and BIPCo facilities from the National Grid on-island
5 substation to BIPCo's six-feeder substation. Given these various
6 responsibilities for constructing, owning and operating facilities, the Town
7 is dependent upon the investments that need to be made to interconnect
8 the cable to the BIPCo system. Without the security that these facilities
9 will be constructed in a timely manner, the Town is faced with uncertainty
10 about whether it will realize economic and environmental benefits from the
11 Project. Consequently, the Town believes, the identification of the
12 investment that must be made to connect the BIPCo system to the cable,
13 its cost and how it will be financed is an essential part of the evaluation of
14 Project.

15

16 **Q. DOES THE TOWN RECOMMEND THAT THIS CONSIDERATION OF**
17 **THE ON-ISLAND DELIVERY SYSTEM BE PART OF THIS DOCKET?**

18 A. No. Ideally, the Town would like these issues settled sooner rather than
19 later, but given the unusually short time frame for this investigation and
20 the directives to the Commission under the amended legislation, it does
21 not realistically expect that all these issues can be addressed in this
22 Docket. The Town, however, does recommend that the Commission
23 proceed quickly with a related Docket to insure that there is an adequate

1 delivery system on Block Island.. As stated earlier, these facilities must
2 be constructed on a timely basis to assure the potential for material
3 economic and environmental benefits to New Shoreham.

4

5 **Q. ARE THERE ANY ADDITIONAL ISSUED THAT ARE RELATED TO THE**
6 **INTERCONNECTION FACILITIES?**

7 A.. Yes, the Commission has required BIPCo to evaluate and update its
8 distribution facilities, most recently in Docket 3900. BIPCo, while agreeing
9 with the need for an upgrade and respecting the Commission's directive,
10 has reported that it is financially unable to make the necessary
11 investments. Absent, a clear plan to upgrade the BIPCo distribution
12 system, the Town's benefits from the Project will be eroded. Also, if
13 BIPCo cannot afford to upgrade its distribution system, the Town is
14 concerned that it may not be able to finance the interconnection of its
15 system to the Project. The Town strongly supports the Project, but wants
16 to emphasize that New Shoreham-specific economic and environmental
17 benefits contemplated by the General Assembly depend upon timely and
18 reliable interconnection of the BIPCo system to the Project.

19

20 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

21 A. Yes it does.

RICHARD LA CAPRA

Richard La Capra is an experienced advisor in a wide range of energy and regulatory issues.

Mr. La Capra is the founder of La Capra Associates, established in 1980 with a goal of providing state-of-the art, innovative technical analysis to regulated industries. He has over thirty years of experience in consulting in the planning, valuation and pricing of services for regulated industries. His experience encompasses financial management, rate of return, competitive procurement and auction strategies, valuation and pricing. Mr. La Capra has negotiated comprehensive restructuring settlements and provided expert consulting services in establishing plant valuation in regulated industries, and new venture feasibility. He has been involved in major bidding and procurement activities in both energy and transportation. His primary interest has been in the energy-related industries, but he has also presented expert testimony on telecommunications, water resources, lending and the taxicab industries. Mr. La Capra is a sought-after teacher and lecturer for industry, trade and research organizations.

ACCOMPLISHMENTS

Mr. La Capra has provided expert testimony in 26 states, federal jurisdictions, legislatures and courts in the areas of transitioning to hybrid (competitive-regulated) markets, interconnection requirements, competitive bidding, power procurement, rate of return, regulated cost of service, facility siting and financial feasibility.

Some of his major assignments have included:

Assisting the financial reorganization of cooperative utilities, including reconfiguring their power supply assets and contracts, and restructuring \$100 million in debt;

Valuating generating assets for purchasers and sellers, taxing entities and utility restructuring;

Designing the auction process for distributing taxi medallions in the City of Boston;

Designing and managing the auction process for the sale of the assets of small utilities;

Designing and managing the auction process for the sale of the power supply infrastructure of several major universities.

Negotiating transmission contracts, wheeling rates, and distribution leases for a number of utilities and independent power producers.

RLC-1 p2 of 2

Providing advice to numerous State jurisdictions on the developmental rules and codes of conduct for wholesale markets;

Providing advisory services to public and private utilities in the areas of pricing, power supply procurement strategies, negotiation of inter-utility contracts, and market hedging strategies;

Serving as Principal Consultant to the Electric Power Research Institute in the areas of electric utility pricing and customer research;

Devising and presenting professional development programs for the Electric Council of New England, the Center for Professional Advancement, the New England Rate Forum, the Electric Power Research Institute, the American Gas Association, the University of Michigan and the University of Missouri;

Directing feasibility studies assessing privatization potential for publicly owned energy facilities; and

EMPLOYMENT

Richard La Capra Consulting

La Capra Associates
Principal in Charge

Charles T. Main, Inc.
Manager - Rates, Financial Services and
Utility Management Consulting Groups

American Electric Power Service Corporation
Rate and Load Research Supervisor

Pennsylvania-New Jersey-Maryland Power Pool
Planning Engineer

EDUCATION

Certificate in Advanced Finance, New York University

M.B.A., Fairleigh Dickinson University
Economics

B.S., Stevens Institute of Technology
Electrical and Mechanical Engineering

PRIOR TESTIMONY

Client	Regulation	Issue/Docket	Subject	Docket Numbers
Arizona PUC Staff	AZ PUC	Restructuring	Development of State Transmission Company Stranded Cost Recovery	98-0471 97-0772 94-0165
Boston Edison Company	MA DTE	Rate Case	2 Cases: Cost Allocation and Load Research	92-92, 89-100
Central Vermont Public Service	VT PSB	Restructuring	Restructuring of HQ Contracts	6140
Connecticut Department of Public Utility Control	CDPUC	Change of Control	ConEd and NU	00-01-11
Colonial Gas	MA-DTE	Rate Case	Rate Design	90-90
District of Columbia Public Service Commission	MD PSC	Retail Competition DSM Funding	Development of Retail Competition Cost Analysis of DSM Programs	98-20 96-181
Division of Energy Resources	MA DTE	Mergers Restructuring	Merger Policy; Restructuring Comments	93-167 96-100
Essex County Gas Company	MA DTE	Resource Plan	Least Cost Plan	93-95
Hawaii Consumer Advocate	HI PUC	Restructuring/ Bidding Rates	Restructuring Comments/ IPP Evaluations	96-0493 97-0213
Maine PUC Staff	ME PUC	Central Maine Power	Rate Design	92-345
Massachusetts Department of Energy Resources	MA DTE	Siting Merger	Boston Edison, Cambridge Electric Light Company merger	99-19

Client	Regulation	Issue/Docket	Subject	Docket Numbers
Nantucket Electric Company	MA DTE	Cable Siting Merger	Least Cost Plan; Merger with Mass Electric	94-119 91-138 91-106
Nevada Attorney General	NPUC	Power Cost Recovery	Power Purchases-Western Energy Crisis	06-12002
New Hampshire PUC Staff	NH PUC	Restructuring	NE Wholesale Prices, transition charge recovery	96-150
NJ Division of the Ratepayer Advocate	NJ BPU	Atlantic City Electric Restructuring	Stranded Cost/ NUG Mitigation	97070456
Office of the Peoples Council (D.C.)	DC PUC	Washington Gas DSM	Least Cost Gas Plan	834-III
Pennsylvania Office of the Consumer Advocate	PA PUC	PECo Qualified Rate Order	Securitization	00973877
Pennsylvania Office of the Consumer Advocate	PA PUC	PP&L Restructuring UGI Restructuring PECo Restructuring	All Cases-Stranded Costs, Transition Cost Recovery, affiliate Relations	00973954 00973975 00973953
RI Division of Public Utilities	RI PUC	Restructuring	Restructuring Plan, Stranded Cost Measurement	2320
Suffolk Legislature	FERC	LIPA-LILCo Merger	Power Management	98-11-000
Vermont Electric Cooperative	VT PSB	Debt Restructuring	Bankruptcy Reorganization	5971
Vermont Joint Owners	VT PSB	Contract Dispute	VJO Hydro-Quebec	50T 198 0197-98

REVISED 11/11/11
BY: [illegible]
DATE: 11/11/11

NOTES:

- TRANSFORMER
- NEW CONNECTION
- DISCONNECT SWITCH
- CHARGE DISCHARGE MISC
- 120V = 120V
- 240V = 240V
- 300V = 300V
- 480V = 480V
- 500V = 500V
- 600V = 600V
- 720V = 720V
- 800V = 800V
- 900V = 900V
- 1000V = 1000V
- 1200V = 1200V
- 1500V = 1500V
- 2000V = 2000V
- 2400V = 2400V
- 3000V = 3000V
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- 172800V = 172800V
- 180000V = 180000V
- 187200V = 187200V
- 194400V = 194400V
- 201600V = 201600V
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