



## DEPARTMENT OF THE NAVY

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### VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk  
State of Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

January 6, 2016

Re: Review of the Narragansett Electric Company d/b/a National Grid Rate Design  
Pursuant to R.I. Gen. Laws § 39-26.6-24 – Docket No. 4568;  
Surrebuttal Testimony of Ali Al-Jabir

Dear Ms. Massaro:

Enclosed for filing on behalf of the Federal Executive Agencies, represented by the Department of the Navy, is an original and nine (9) copies of the Surrebuttal Testimony of Ali Al-Jabir.

Please call me at (202) 685-9122 if you have any questions concerning this filing. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. G.", is positioned above the typed name.

Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

cc: Service List for Docket No. 4568

**BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**IN RE: REVIEW OF THE NARRAGANSETT  
ELECTRIC COMPANY D/B/A NATIONAL  
GRID'S RATE DESIGN PURSUANT TO R.I.  
GEN. LAWS § 39-26.6-24**

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**DOCKET NO. 4568**

Surrebuttal Testimony of

**Ali Al-Jabir**

On behalf of

**The Federal Executive Agencies**

January 6, 2016



BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION

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	)	

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**DOCKET NO. 4568**

**Surrebuttal Testimony of Ali Al-Jabir**

**1    Introduction**

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

**3    A     My name is Ali Al-Jabir and my business address is 5151 Flynn Parkway, Suite 412**  
**4           C/D, Corpus Christi, TX 78411.**

**5    Q     WHAT IS YOUR OCCUPATION?**

**6    A     I am an energy advisor and a Senior Consultant in the field of public utility regulation**  
**7           with the firm of Brubaker & Associates, Inc. ("BAI").**

**8    Q     ARE YOU THE SAME ALI AL-JABIR WHO PREVIOUSLY FILED DIRECT**  
**9           TESTIMONY IN THIS PROCEEDING?**

**10   A     Yes, I am.**

**11   Q     ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN**  
**12           YOUR PRIOR TESTIMONY?**

**13   A     Yes. This information is included in Appendix A to my direct testimony filed on behalf**  
**14           of the Federal Executive Agencies ("FEA") on October 23, 2015.**

1    **Q       ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

2    A       I am appearing on behalf of the FEA. Our firm is under contract with the United  
3           States Department of the Navy ("Navy") to perform cost of service, rate design and  
4           related studies. The Navy represents the Department of Defense and all other  
5           Federal Executive Agencies in this proceeding. The FEA is a large consumer of  
6           electricity in the service territory of the Narragansett Electric Company ("National  
7           Grid" or "the Company") and takes electric service from the Company primarily on  
8           Rate G-62.

9    **Q       WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

10   A       My surrebuttal testimony responds to certain arguments raised by National Grid in its  
11           rebuttal testimony dated December 16, 2015. Specifically, I respond to the sections  
12           of the Company's rebuttal testimony that address the proposed consolidation of Rate  
13           G-32 and Rate G-62, as well as the proposal to apply an Access Fee to stand-alone  
14           distributed generators ("DG") on the Company's system.

15   **Q       PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

16   A       My conclusions and recommendations can be summarized as follows:

- 17           1. The Rhode Island Public Utilities Commission ("Commission") should reject the  
18           Company's proposal to consolidate Rate G-32 and Rate G-62.
- 19           2. The Company's rebuttal testimony does not adequately address the concerns I  
20           raised in objection to the rate consolidation proposal with respect to consistency  
21           with Commission precedent, consistency with the goals of Rhode Island General  
22           Laws Section 39-26.6-24 ("the Act"), the cost support for the proposal or the  
23           mitigation of bill impacts.
- 24           3. The Company's rebuttal testimony concedes that rate consolidation is not  
25           necessary to accomplish the goals of the Act and further concedes that bill impact  
26           mitigation should be considered in the evaluation of rate design proposals. These  
27           considerations favor rejection of the rate consolidation proposal.

4. The Commission should also reject the Company's proposal to impose an Access Fee on stand-alone DG facilities in this proceeding.
5. National Grid has not provided adequate cost support or justification for its proposal. The Company's rebuttal testimony sets forth rhetorical arguments regarding the cost support for the proposed Access Fee, but the testimony does not provide any data or cost analysis to support these arguments.
6. If the Commission wishes to further evaluate the Access Fee concept, it should do so in a full rate case proceeding, relying on an updated allocated class cost of service study ("ACCOSS") with current usage and cost data to ensure that the Access Fee is reasonably cost-based. Moreover, the ACCOSS that is used to establish the Access Fee should separately evaluate stand-alone DG units to ensure that the resulting Access Fee reasonably reflects the unique usage and cost characteristics of these units on the Company's delivery system.
7. The Company has not provided any cost analysis in support of its grandfathering proposal or its alternative rate proposals for DG customers. Therefore, the Commission should reject these proposals in this proceeding.
8. If National Grid wishes to submit a grandfathering proposal or other rate proposals for DG customers as an alternative to the proposed Access Fee, it should be required to provide a thorough cost justification for such proposals in a future rate case.

### **Consolidation of Rate G-32 and Rate G-62**

**Q PLEASE SUMMARIZE THE ARGUMENTS YOU RAISED IN YOUR DIRECT TESTIMONY DATED OCTOBER 23, 2015 IN OPPOSITION TO THE COMPANY'S RATE CONSOLIDATION PROPOSAL.**

**A** In my October 23, 2015 direct testimony, I raised the following concerns with respect to the Company's proposal to consolidate Rate G-32 and Rate G-62:

1. The proposal is inconsistent with the Commission's decision in Docket No. 4065.
2. The rate consolidation is not necessary to achieve the goals of the Act.
3. The Company's proposal is contrary to the goals of the Act because it would create a new per kWh energy charge for current Rate G-62 customers where no such charge now exists. This new energy charge would increase the Company's exposure to the loss of fixed cost recovery due to reduced metered energy consumption associated with distributed generation ("DG") deployment, where such exposure is minimal under the current Rate G-62 distribution service rate design.

1 4. The consolidation proposal would result in a significant adverse rate impact to the  
2 Navy.

3 5. The Commission should not rely on an outdated ACCOSS in making its decision  
4 on the proposed rate consolidation.

5 **Q HAS THE COMPANY ADEQUATELY RESPONDED TO THE CONCERNS YOU**  
6 **RAISED?**

7 A No. The Company submitted fewer than two pages of rebuttal testimony regarding its  
8 rate consolidation proposal.<sup>1</sup> This rebuttal testimony does not adequately respond to  
9 the concerns I raised and it does not justify adoption of the rate consolidation  
10 proposal.

11 **Q DID THE COMPANY ADEQUATELY ADDRESS YOUR CONCERNS REGARDING**  
12 **CONSISTENCY WITH THE PRECEDENT ESTABLISHED BY THE COMMISSION'S**  
13 **DECISION IN DOCKET NO. 4065?**

14 A No. In my direct testimony, I pointed out that the Commission previously rejected a  
15 similar rate consolidation proposal in Docket No. 4065 on the basis that the proposal  
16 would result in a detrimental impact to Rate G-62 customers. The Company does not  
17 discuss this precedent in its rebuttal testimony and it does not explain why that  
18 precedent should be disregarded in this proceeding.

19 **Q HAS THE COMPANY ADEQUATELY RESPONDED TO YOUR CONCERNS**  
20 **REGARDING THE CONSISTENCY OF ITS PROPOSAL WITH THE ACT?**

21 A No. In fact, the Company concedes that there is no nexus between its proposal and  
22 the Act when it states that the "Company acknowledges that the proposal to

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<sup>1</sup>National Grid, Joint Rebuttal Testimony of Peter T. Zschokke, Jeanne A. Lloyd and Timothy R. Roughan, pages 50 – 51.

1 consolidate Rates G-32 and G-62 is not necessary to accomplish the purposes of  
2 Section 24 of the Act.”<sup>2</sup> This concession underscores the point I made in my direct  
3 testimony that the rate consolidation is not necessary to accomplish the goals of the  
4 Act and such rate consolidation should therefore not be implemented in this case.

5 The Company’s rebuttal testimony makes no effort to address the concern I  
6 raised in my direct testimony with respect to the introduction of a new variable energy  
7 charge for current Rate G-62 customers under the rate consolidation and the fact that  
8 this new energy charge would increase the potential for reduced fixed cost recovery  
9 due to expanded DG deployment. Therefore, this point remains uncontroverted by  
10 the Company.

11 **Q DID THE COMPANY ADDRESS THE ADVERSE RATE IMPACTS OF THE RATE**  
12 **CONSOLIDATION PROPOSAL ON THE NAVY OR OTHER RATE G-62**  
13 **CUSTOMERS?**

14 **A** The Company acknowledged that, in its last two rate cases, it determined that the  
15 rate increases necessary to bring the Rate G-62 class to full cost of service “would  
16 result in excessive bill impacts to Rate G-62 customers.”<sup>3</sup> However, the Company’s  
17 rebuttal testimony offers no evidence to explain why the bill impacts on Rate G-62  
18 customers such as the Navy in this proceeding are justified when they were deemed  
19 excessive in prior proceedings.

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<sup>2</sup>Ibid., page 50.

<sup>3</sup>Ibid., page 50.



1    **Q     DID THE COMPANY CONCEDE THAT THE MITIGATION OF BILL IMPACTS ON**  
2    **CUSTOMERS IS A LEGITIMATE RATE DESIGN OBJECTIVE?**

3    A     Yes. The Company stated that “subsidies to certain rate classes are sometimes  
4           necessary to alleviate bill impacts that may be considered undesirable” and further  
5           asserted that “the Company, and ultimately, the PUC recognize that temporary or  
6           permanent subsidies may be appropriate to achieve desired goals.”<sup>4</sup> Thus, the  
7           Company conceded that bill impact mitigation is an appropriate rate design  
8           consideration.

9    **Q     DID THE COMPANY ADEQUATELY RESPOND TO YOUR CONCERNS**  
10   **REGARDING RELIANCE ON AN OUTDATED ACCOSS TO SUPPORT THE RATE**  
11   **CONSOLIDATION PROPOSAL?**

12   A     No. The Company merely made an unsubstantiated assertion that it has no reason  
13           to expect that an updated ACCOSS study prepared for its next general rate case will  
14           produce results significantly different from its two most recent ACCOSS.<sup>5</sup> However,  
15           this statement is unsupported by any facts, data or analysis and is therefore  
16           unpersuasive.

17           As acknowledged in its rebuttal testimony, National Grid’s most recent  
18           ACCOSS relies on data from a 2011 test year.<sup>6</sup> Therefore, that data is now four  
19           years old. Significant changes in customer energy consumption patterns and  
20           customer class composition that would have material impacts on ACCOSS results  
21           can occur in a four year period. Given that National Grid has not provided any  
22           evidence or analysis to demonstrate that its most recent ACCOSS continues to reflect  
23           current conditions on its system, it would be inappropriate for the Commission to rely

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<sup>4</sup>Ibid., pages 14 and 15.

<sup>5</sup>Ibid., page 51.

<sup>6</sup>Ibid., page 56.

on this outdated ACCOSS to make a decision on the Company's rate consolidation proposal, particularly when there is no nexus between the proposal and the goals of the Act that are guiding the current rate design proceeding.

**Q PLEASE SUMMARIZE YOUR CONCLUSIONS WITH RESPECT TO THE COMPANY'S REBUTTAL TESTIMONY REGARDING THE RATE CONSOLIDATION PROPOSAL.**

A The Company has not adequately addressed the concerns I raised in objection to the rate consolidation proposal in the areas of consistency with Commission precedent, consistency with the goals of the Act, the cost support for the proposal or the mitigation of bill impacts. Rather, the Company's rebuttal testimony concedes that rate consolidation is not necessary to accomplish the goals of the Act, and further concedes that bill impact mitigation should be considered in the evaluation of rate design proposals. Consequently, I continue to recommend that the Commission reject the consolidation of Rate G-32 and Rate G-62 in this proceeding.

### **The Company's Access Fee Proposal**

**Q PLEASE SUMMARIZE THE PRINCIPAL ARGUMENTS YOU RAISED IN YOUR DIRECT TESTIMONY DATED NOVEMBER 23, 2015 IN OPPOSITION TO THE COMPANY'S ACCESS FEE PROPOSAL.**

A In my November 23, 2015 direct testimony, I raised the following two major concerns with respect to the Company's proposed Access Fee:

1. The Access Fee was developed using stale cost and usage data.
2. The Company's cost support for the Access Fee relies on an ACCOSS that does not separately allocate costs to stand-alone DG facilities on National Grid's system.

1    **Q     DID THE COMPANY ADEQUATELY RESPOND TO YOUR CONCERNS**  
2    **REGARDING ITS RELIANCE ON STALE COST AND USAGE DATA?**

3    A     No. In its rebuttal testimony, the Company simply asserts that its most recently  
4    approved ACCOSS is representative of current costs.<sup>7</sup> However, National Grid did  
5    not provide any evidence or analysis to substantiate this assertion. As I previously  
6    explained in my surrebuttal testimony, significant changes in customer energy  
7    consumption patterns and customer class composition that would have material  
8    impacts on ACCOSS results can occur in a four year period. Therefore, it is  
9    unreasonable to adopt Access Fees in this proceeding using data from an outdated  
10   ACCOSS when there are no facts or evidence in the record to suggest that the most  
11   recent ACCOSS reflects current conditions on National Grid's system.

12   **Q     DID THE COMPANY ADEQUATELY ADDRESS YOUR CONCERNS REGARDING**  
13   **SEPARATELY EVALUATING STAND-ALONE DG CUSTOMERS IN ITS ACCOSS?**

14   A     No. In response to this concern, the Company simply asserts that "there is no  
15   evidence that a customer who uses the integrated distribution system for back-up or  
16   supplemental service costs less to serve than does a full-requirements customer."<sup>8</sup>  
17   National Grid goes on to allege that "the current distribution system requirements of  
18   stand-alone DG facilities are the same as customers who do not have DG."<sup>9</sup> National  
19   Grid should bear the burden of proof to justify any new charges it proposes with well  
20   documented evidence and analysis. Given that the Company did not provide any  
21   data or analysis to support its assertions regarding the cost characteristics of  
22   stand-alone DG facilities, it has clearly not met its burden of proof on this issue.

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<sup>7</sup>Ibid., page 56.

<sup>8</sup>Ibid., page 20.

<sup>9</sup>Ibid., page 57.

Stand-alone DG customers are distinct from other customers on the Company's system in that they utilize the distribution system primarily for power exports rather than for on-site consumption. When National Grid proposes a new Access Fee that applies only to stand-alone DG facilities, it must meet its burden of proof by demonstrating that the proposed Access Fee is cost based. Given the unique usage characteristics of stand-alone DG facilities, this can only be properly accomplished through the development of a cost analysis that separately evaluates the cost to serve stand-alone DG facilities. The Company has not provided such an analysis in this proceeding.

**Q PLEASE SUMMARIZE YOUR UNDERSTANDING OF THE COMPANY'S GRANDFATHERING PROPOSAL WITH RESPECT TO THE APPLICATION OF THE ACCESS FEE.**

A The Company proposes to exempt stand-alone DG facilities from the proposed Access Fee if the facilities have already entered into a long-term contract or DG standard contract with National Grid, or if the a proposed stand-alone DG project submits a complete interconnection application with the Company no later than December 31, 2016. This grandfathering provision would apply only to the initial customer of record for the DG project.<sup>10</sup>

**Q DOES THIS GRANDFATHERING PROPOSAL ADEQUATELY RESOLVE YOUR CONCERNS SURROUNDING THE PROPOSED ACCESS FEE?**

A No. The Company's grandfathering proposal does nothing to address the concerns I raised regarding the inadequate cost analysis supporting the proposed Access Fee.

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<sup>10</sup>Ibid., pages 61 – 62.

Moreover, National Grid's proposal is objectionable because it does not purport to be based on the cost of serving individual stand-alone DG projects.

**Q HAS THE COMPANY OFFERED A PROPOSAL AS AN ALTERNATIVE TO ADOPTION OF ITS PROPOSED ACCESS FEE?**

A Yes. National Grid states that, if the Commission determines that the proposed Access Fee should not be adopted at this time, the Commission should instead direct that stand-alone DG customers with demands in excess of 200 kW must take retail delivery service on Rate G-32 rather than Rate C-06. The Company further proposes that the Commission require the development of a new charge applicable to all DG customers that would recover the ongoing operation and maintenance ("O&M") expenses associated with the interconnection facilities installed to serve such customers.<sup>11</sup>

**Q DID THE COMPANY PROVIDE ANY COST ANALYSIS OR OTHER EVIDENCE TO SUPPORT THE APPLICATION OF THESE CHARGES TO DG CUSTOMERS?**

A No. The Company addressed this alternative proposal in one paragraph of its rebuttal testimony, without providing any cost analysis or other evidence to support its proposal.

**Q WHAT IS YOUR REACTION TO THE COMPANY'S ALTERNATIVE PROPOSAL?**

A As I explained earlier, National Grid should bear the burden of proof with regard to any new rates or charges that it proposes in this proceeding. Consequently, it would be inappropriate for the Commission to change the retail delivery service class for stand-alone DG customers without evidence that the current Rate G-32 charges

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<sup>11</sup>Ibid., page 65.

1 reasonably reflect the distribution costs that the Company incurs to serve such  
2 customers. The Company has not provided evidence to demonstrate that this is the  
3 case. If the Company wishes to submit such a proposal with supporting cost analysis  
4 and evidence in a future rate case, the Commission could evaluate the proposal in  
5 that proceeding.

6 Furthermore, the Commission should not require the development of a new  
7 O&M charge for DG customers in the absence of any cost analysis that demonstrates  
8 how such a charge would be developed and what the level of the O&M charge would  
9 be. Again, the Company is free to submit a proposal for a new DG O&M charge that  
10 is supported by a thorough cost analysis in a future rate case. However, in the  
11 absence of such an analysis, the Commission should decline to order the  
12 implementation of such an O&M charge in this proceeding.

13 **Q PLEASE SUMMARIZE YOUR CONCLUSIONS WITH RESPECT TO THE**  
14 **COMPANY'S REBUTTAL TESTIMONY REGARDING THE ACCESS FEE**  
15 **PROPOSAL.**

16 **A** I continue to recommend that the Commission reject the proposed Access Fee in this  
17 proceeding. For the reasons discussed in my direct and rebuttal testimonies,  
18 National Grid has not provided adequate cost support or justification for its proposal.

19 As I stated in my direct testimony regarding the proposed Access Fee, if the  
20 Commission wishes to reevaluate the Access Fee concept, it should do so in a full  
21 rate proceeding that relies on an updated ACCOSS with current usage and cost data  
22 to ensure that the Access Fee is reasonably cost-based. Moreover, the ACCOSS  
23 that is used to establish the Access Fee should separately evaluate stand-alone DG  
24 units to ensure that the resulting Access Fee reasonably reflects the unique usage  
25 and cost characteristics of these units on the Company's delivery system.

1           Similarly, the Company has not adequately supported its grandfathering  
2           proposal or its alternative rate proposals for DG customers. Therefore, the  
3           Commission should reject these proposals in this proceeding. If National Grid wishes  
4           to submit a grandfathering proposal or other rate proposals for DG customers as an  
5           alternative to the proposed Access Fee, it should be required to provide a thorough  
6           cost justification for such proposals in a future rate case.

7   **Q       DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

8   **A       Yes, it does.**

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**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4568

I hereby certify on this 6th day of January, 2016, a copy of the cover letter and the Direct Testimony of Ali Al-Jabir on the Access Fee, on behalf of the Federal Executive Agencies, were electronically transmitted to the individuals listed below. An original hard copy was sent via first class mail to National Grid and the Division of Public Utilities & Carriers. An original hard copy and nine (9) copies of this filing have been sent via first class mail to the Clerk of the Rhode Island Public Utilities Commission.

  
Allison M. Genco, Esq.

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24  
Service List**

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