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PREPARED DIRECT TESTIMONY
OF
JOSHUA WARMACK

- 1. Q. PLEASE STATE YOUR FULL NAME AND BUSINESS ADDRESS.
A. My name is Joshua R. Warmack, and my business address is 4170 Ashford Dunwoody Road, Suite 550, Atlanta, Georgia 30319.

- 2. Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
A. I am a Vice President and Managing Partner of EnerVision, Inc. (EnerVision), a utility consulting firm that specializes in providing business, management, and technical services to electric utilities. EnerVision primarily focuses on providing consulting services to electric cooperatives, such as Flint Electric Membership Corporation (Flint EMC).

- 3. Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND.
A. I graduated in 2004 from the Georgia Institute of Technology (Georgia Tech) with a Bachelors Degree in Industrial Engineering.

- 4. Q. PLEASE STATE YOUR PROFESSIONAL EXPERIENCE.
A. I joined EnerVision in the summer of 2004 and have spent the last 19 years assisting electric cooperatives in many different areas including demand side management (including energy efficiency, demand response, direct load control,

24 and consumer engagement); smart grid and other technology solutions; renewable
25 and distributed generation; and wholesale and retail rate services.

26

27 5. Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

28 A. The purpose of my testimony is to clearly state, explain, and provide information
29 and documentation for Flint EMC's staff to consider in connection with its effort
30 to develop a position relating to two new standards established by the Public
31 Utility Regulatory Policies Act (PURPA) of 1978, as amended by the
32 Infrastructure Investment and Jobs Act of 2021. Those Standards are: 1) Demand-
33 response practices, pursuant to 16 U.S.C. § 2621(d)(20) and; 2) Electric vehicle
34 charging programs, pursuant to 16 U.S.C. § 2621(d)(21).

35

36 **New PURPA Standard on Demand-Response Practices (16 U.S.C. § 2621(d)(20))**

37 6. Q. PLEASE DESCRIBE THE PURPA STANDARD ON DEMAND-RESPONSE
38 PRACTICES.

39 A. Subsection (A) of this new PURPA Standard requires affected utilities to consider
40 and promote the use of demand-response and demand flexibility practices by
41 commercial, residential, and industrial consumers to reduce electricity
42 consumption during periods of unusually high demand.

43

44 Subsection (B) of this new PURPA Standard specifies Flint EMC, as a
45 nonregulated electric utility, may establish rate mechanisms for the timely
46 recovery of the costs of promoting demand-response and demand flexibility
47 practices in accordance with subparagraph (A).

48 7. Q. HAS FLINT EMC CONSIDERED THE NEW PURPA STANDARD ON
49 DEMAND-RESPONSE PRACTICES?

50 A. Yes, it is my testimony that the staff of Flint EMC, with my assistance, has fully
51 considered this new PURPA Standard, including both Parts (A) and (B)(ii).

52

53 8. Q. WHAT PRACTICES DOES FLINT EMC UTILIZE TO PROMOTE THE USE
54 OF DEMAND-RESPONSE AND DEMAND FLEXIBILITY PRACTICES BY
55 ITS CONSUMERS AS SPECIFIED IN THE NEW PURPA STANDARD ON
56 DEMAND-RESPONSE PRACTICES?

57 A. Flint EMC obtains their power supply energy resources for their members through
58 long-term contractual agreements that provide Flint EMC great flexibility to
59 implement demand-side management programs aimed at reducing peak loads.

60 This includes programs such as a switch-based load management program for air
61 conditioners (A/C) and electric water heaters that Flint EMC has offered for over
62 20 years. This program currently reduces the load of nearly 19,000 A/C and water
63 heater units across Flint EMC's service territory during peak demand conditions.

64 Participants in the load management switch program receive an annual incentive
65 for their willingness to reduce load during peak demand periods. Flint EMC also
66 offers an Electric Vehicle Time-of-Use rate for residential members that own an
67 electric vehicle, to help modify consumption behavior and encourage using
68 energy outside of peak demand periods.

69

70 In addition to the demand side management programs focused on the residential
71 sector described herein, Flint EMC also offers a wide variety of time-based rate

72 tariffs that require and/or encourage commercial and industrial members to
73 modify their consumption behavior and reduce costs for themselves and Flint
74 EMC, especially during peak demand time periods. These rate tariffs include
75 Critical Peak Pricing – Irrigation, Interruptible Irrigation Service, Critical Peak
76 Pricing – Poultry Houses, Large Industrial Curtailable, Commercial (Non-
77 Demand and Demand) TOU, Large Industrial Hourly Energy, Educational System
78 Service, and others.

79
80 In addition to its time-based rate tariffs, Flint EMC also offers online energy
81 saving tips and rooftop solar information. These offerings help members to
82 understand their usage and implement measures that reduce their overall electrical
83 usage, including during peak demand periods.

84
85 Flint EMC is also working with several very large industrial potential loads to
86 understand their load management capabilities. These potential new loads may
87 ultimately receive service under a pass-through rate tariff with billing
88 determinants tied to peak demand periods. Reducing these new loads'
89 contributions to those peak demands will reduce their energy costs.

90

91 9. Q. ARE THERE ANY OTHER PROGRAMS THAT FLINT EMC OFFERS TO
92 PROMOTE THE USE OF DEMAND-RESPONSE AND DEMAND
93 FLEXIBILITY PRACTICES BY ITS CONSUMERS AS SPECIFIED IN THE
94 NEW PURPA STANDARD ON DEMAND-RESPONSE PRACTICES?

95 A. Flint EMC offers many time-based rate tariffs for residential, commercial, and
96 industrial members that promote reducing usage during high demand periods.
97 These rate tariffs include time-of-use, critical peak pricing, interruptible, and net
98 metering options. These types of rate tariffs provide clear price signals to the
99 consumers allowing them to modify their consumption behavior and reduce costs
100 for themselves and Flint EMC, especially during peak demand time periods.

101
102 Flint EMC offers net metering for those members with distributed generation
103 facilities. Solar photovoltaic systems are the dominant distributed energy resource
104 within Flint EMC's service territory. The energy generation profile of solar
105 photovoltaic systems aligns reasonably well with peak demand periods, helping to
106 reduce the members' usage, especially during peak demand periods.

107
108 10. Q. HAS FLINT EMC, A NONREGULATED UTILITY, ESTABLISHED RATE
109 MECHANISMS FOR THE TIMELY RECOVERY OF THE COSTS OF
110 PROMOTING DEMAND-RESPONSE AND DEMAND FLEXIBILITY
111 PRACTICES AS SPECIFIED IN THE NEW PURPA STANDARD ON
112 DEMAND-RESPONSE PRACTICES?

113 A. Yes. Flint EMC, a nonprofit electric cooperative, reviews its operating budget
114 annually. As such, Flint EMC's Board of Directors, elected by Flint EMC's
115 members and members themselves, approve the operating budget on an annual
116 basis. The operating budget includes all demand side management offerings and
117 associated programs, including promotion of the demand-response and demand

118 flexibility aspects. Once approved, the operating budget dictates Flint EMC's
119 revenue requirements and is funded by all rates and rate payers (members).

120

121 **New PURPA Standard on Electric Vehicle Charging Programs (16 U.S.C. § 2621(d)(21))**

122 11. Q. PLEASE DESCRIBE THE NEW PURPA STANDARD ON ELECTRIC
123 VEHICLE CHARGING PROGRAMS.

124 A. This new PURPA Standard calls for affected utilities to consider measures to
125 promote greater electrification of the transportation sector, including establishing
126 rates to promote and improve electric vehicle (EV) charging options and public
127 EV charging infrastructure. Specifically, the standard requires that utilities, such
128 as Flint EMC, consider actions that promote affordable and equitable electric
129 vehicle charging options for residential, commercial, and public vehicle charging
130 infrastructure; consider elements to improve the customer experience associated
131 with electric vehicle charging, including reduced charging time for light, medium,
132 and heavy-duty vehicles; accelerates third party investment in electric vehicle
133 charging for light, medium, and heavy-duty vehicles and provides for the
134 appropriate recovery of the marginal cost of delivering electricity to electric
135 vehicles and electric vehicle charging infrastructure. All of which is shown in 16
136 U.S.C. § 2621(d)(21) as (A), (B), (C), and (D).

137

138 12. Q. HAS FLINT EMC CONSIDERED THE NEW PURPA STANDARD ON
139 ELECTRIC VEHICLE CHARGING PROGRAMS?

140 A. Yes, it is my testimony that the staff of Flint EMC has fully considered this new
141 PURPA Standard, including Parts (A), (B), (C), and (D).

- 142 13. Q. PLEASE DESCRIBE FLINT EMC’S CONSIDERATION PRACTICES
143 UNDERTAKEN IN CONNECTION WITH THE NEW STANDARD ON EV
144 CHARGING?
- 145 A. Flint EMC, a nonprofit electric distribution cooperative, is not regulated by the
146 Georgia Public Service Commission (PSC). Flint EMC is an active participant, as
147 a member of Georgia EMC, in legislative efforts impacting electric utilities in the
148 State of Georgia. Regarding 16 U.S.C. § 2621 (d)(21)(A), Flint EMC provides
149 residential (Schedule EVTOU-3) and commercial (Schedule CEV-1) rate options
150 specifically for EV charging. The residential option (Schedule EVTOU-3) is
151 based on Flint EMC’s time of use rate and is available to all residential members
152 utilizing a Level 2 EV charger. The commercial rate option (Schedule CEV-1)
153 uses a flat energy charge to help spur the development of larger, public EV
154 charging infrastructure and has been designed to exclude demand charges and is
155 available to all non-residential members. The residential rate encourages and
156 incentivizes EV charging outside of peak energy usage hours. Additionally, in
157 2022 and 2023 Flint EMC offered the “Drive Free for a Year” EV program
158 whereby participants that opted in to the EVTOU-3 rate received a \$33 per month
159 bill credit. That bill credit approximates the energy cost associated with charging
160 an EV for an entire year. Regarding 16 U.S.C. § 2621 (d)(21)(B), Flint EMC
161 does own, operate, and control a DC fast charger at its Headquarters office, which
162 is located within a “charging desert” and was put near a major state highway.
163 Flint EMC is also in the process of installing a Level 2 charger at its Member
164 Center office for fleet and public use. Also, Flint EMC provides members with a
165 wealth of information on its website, in the section devoted solely to EV

166 information, including applicable rates. Regarding 16 U.S.C. § 2621(d)(21)(C),
167 Flint EMC, is pursuing an effort to secure grant funds to assist with developing
168 public EV charging infrastructure in two of its counties considered to be
169 disadvantaged communities. Regarding 16 U.S.C. § 2621(d)(21)(D), Flint EMC
170 regularly reviews its cost of service and revises its retail rates, as well as its
171 service rules and regulations, to ensure adequate and appropriate recovery of all
172 distribution system costs. Flint EMC's last cost of service study was approved by
173 its Board in February of 2023 with the next iteration occurring every two years.
174 Flint EMC stands ready to provide electricity to any newly developed EV
175 charging site within its service territory. This positions Flint EMC to continue to
176 participate in any State-led efforts to implement those measures specified in the
177 PURPA Standard on EV charging. As such, absent the possibility that compelling
178 testimony to the contrary is presented at the PURPA hearing, Flint EMC's
179 consideration of this PURPA Standard is complete and no additional actions are
180 necessary.

181

182 14. Q. DOES THIS CONCLUDE YOUR TESTIMONY?

183 A. Yes, it does.