

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

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 Okefenoke Rural Electric Membership Corporation (Okefenoke REMC).

- 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,

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

3
4 5. Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

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

12
13 **New PURPA Standard on Demand-Response Practices (16 U.S.C. § 2621(d)(20))**

14 6. Q. PLEASE DESCRIBE THE PURPA STANDARD ON DEMAND-RESPONSE
15 PRACTICES (16 U.S.C. § 2621(d)(20)).

16 A. Subsection "A" of this new PURPA Standard requires affected utilities to
17 consider and promote the use of demand-response and demand flexibility
18 practices by commercial, residential, and industrial consumers to reduce
19 electricity consumption during periods of unusually high demand.

20
21 Subsection "B" of this new PURPA Standard specifies Okefenoke REMC, as a
22 nonregulated electric utility, may establish rate mechanisms for the timely
23 recovery of the costs of promoting demand-response and demand flexibility
24 practices in accordance with subparagraph (A).

1 7. Q. HAS OKEFENOKE REMC CONSIDERED THE NEW PURPA STANDARD
2 ON DEMAND-RESPONSE PRACTICES?

3 A. Yes, it is my testimony that the staff of Okefenoke REMC, with my assistance,
4 has fully considered this new PURPA Standard, including both Parts (A) and
5 (B)(ii).
6

7 8. Q. WHAT PRACTICES DOES OKEFENOKE REMC UTILIZE TO PROMOTE
8 THE USE OF DEMAND-RESPONSE AND DEMAND FLEXIBILITY
9 PRACTICES BY ITS CONSUMERS AS SPECIFIED IN THE NEW PURPA
10 STANDARD ON DEMAND-RESPONSE PRACTICES?

11 A. Okefenoke REMC obtains its power supply energy resources for its members
12 through long-term contractual agreements that provide Okefenoke REMC great
13 flexibility to implement demand-side management programs aimed at reducing
14 peak loads. This includes Residential Time-of-Use (TOU), General Service TOU,
15 and School Load Management Service rate tariffs that provide clear price signals
16 to the consumers allowing them to modify their consumption behavior and reduce
17 costs for themselves and Okefenoke REMC, especially during peak demand time
18 periods.
19

20 In addition to its time-based rate tariffs, Okefenoke REMC also offers online
21 energy calculators and rooftop solar information. These offerings help members
22 to understand their usage and implement measures that reduce their overall
23 electrical usage, including during peak demand periods.
24

1 Okefenoke REMC is also working with a very large industrial member to
2 understand its load management capabilities as the member expands its facilities
3 to nearly 200 MW of load. This member receives service under a pass-through
4 rate tariff with billing determinants tied to peak demand periods. Reducing the
5 member's contribution to those peak demands will reduce its energy costs.

6
7 9. Q. ARE THERE ANY OTHER PROGRAMS THAT OKEFENOKE REMC
8 OFFERS TO PROMOTE THE USE OF DEMAND-RESPONSE AND
9 DEMAND FLEXIBILITY PRACTICES BY ITS CONSUMERS AS SPECIFIED
10 IN THE NEW PURPA STANDARD ON DEMAND-RESPONSE PRACTICES?

11 A. Okefenoke REMC offers net metering for those members with distributed
12 generation facilities. Solar photovoltaic systems are the dominant distributed
13 energy resource within Okefenoke REMC's service territory. The energy
14 generation profile of solar photovoltaic systems aligns reasonably well with peak
15 demand periods, helping to reduce the members' usage, especially during peak
16 demand periods.

17
18 10. Q. HAS OKEFENOKE REMC, A NONREGULATED UTILITY, ESTABLISHED
19 RATE MECHANISMS FOR THE TIMELY RECOVERY OF THE COSTS OF
20 PROMOTING DEMAND-RESPONSE AND DEMAND FLEXIBILITY
21 PRACTICES AS SPECIFIED IN THE NEW PURPA STANDARD ON
22 DEMAND-RESPONSE PRACTICES?

23 A. Yes. Okefenoke REMC, a nonprofit electric cooperative, reviews its operating
24 budget annually. As such, Okefenoke REMC's Board of Directors, elected by

1 Okefenoke REMC's members and members themselves, approve the operating
2 budget on an annual basis. The operating budget includes all demand side
3 management offerings and associated programs, including promotion of the
4 demand-response and demand flexibility aspects. Once approved, the operating
5 budget dictates Okefenoke REMC's revenue requirements and is funded by all
6 rates and rate payers (members).

7
8 **New PURPA Standard on Electric Vehicle Charging Programs (16 U.S.C. § 2621(d)(21))**

9 11. Q. PLEASE DESCRIBE THE NEW PURPA STANDARD ON ELECTRIC
10 VEHICLE CHARGING PROGRAMS.

11 A. This new PURPA Standard calls for affected utilities to consider measures to
12 promote greater electrification of the transportation sector, including establishing
13 rates to promote and improve electric vehicle (EV) charging options and public
14 EV charging infrastructure.

15
16 12. Q. HAS OKEFENOKE REMC CONSIDERED THE NEW PURPA STANDARD
17 ON ELECTRIC VEHICLE CHARGING PROGRAMS?

18 A. Yes, it is my testimony that the staff of Okefenoke REMC has fully considered
19 this new PURPA Standard, including Parts (A), (B), (C), and (D).

20
21 13. Q. PLEASE DESCRIBE OKEFENOKE REMC'S CONSIDERATION PRACTICES
22 UNDERTAKEN FOR THE NEW STANDARD ON EV CHARGING?

23 A. Okefenoke REMC, a nonprofit electric distribution cooperative, is not regulated
24 by the Georgia Public Service Commission (GPSC). Okefenoke REMC is an

1 active participant, as a member of Georgia EMC, in legislative efforts impacting
2 electric utilities in the State of Georgia. Regarding 16 U.S.C. § 2621 (d)(21)(A),
3 Okefenoke EMC provides residential and commercial time-of-use rate options,
4 which can benefit members that opt to charge their EVs during off peak hours.
5 The residential option is based on Okefenoke EMC's time of use rate and is
6 available to all residential members. The commercial rate option is also based on
7 a time of use rate philosophy and is available to all non-residential members.
8 Both rates encourage and incentivize EV charging outside of peak energy usage
9 hours. Regarding 16 U.S.C. § 2621 (d)(21)(B), Okefenoke EMC does not own,
10 operate, or control EV infrastructure, therefore Okefenoke EMC's ability to
11 enhance the customer's experience is somewhat limited. Regarding 16 U.S.C. §
12 2621(d)(21)(C), Okefenoke REMC is preparing to provide service to a three-
13 phase Level 3 EV fast charger and is working to implement EV-related rates.
14 Regarding 16 U.S.C. § 2621(d)(21)(D), Okefenoke EMC periodically reviews its
15 cost of service and revises its retail rates, as well as its service rules and
16 regulations, to ensure adequate and appropriate recovery of all distribution system
17 costs. For the foreseeable future Okefenoke REMC will not own, operate, or
18 control EV charging facilities. Okefenoke REMC stands ready to provide
19 electrical service to any new EV charging facilities within its service territory.
20 This positions Okefenoke REMC to continue to participate in any State-led efforts
21 to implement those measures specified in PURPA Standard Section 2621(d)(21).
22 As such, absent the possibility that compelling testimony to the contrary is
23 presented at the PURPA hearing, Okefenoke REMC's consideration of PURPA
24 Standard Section 2621(d)(21) is complete and no additional actions necessary.

1 14. Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2 A. Yes, it does.