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PAUL RENNER
*Speaker of the House of
Representatives*

June 21, 2024

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 20240025 - EI

Dear Mr. Teitzman,

Please find enclosed for filing in the above referenced docket the **non-confidential** Direct Testimony and Exhibits of Kevin J. Mara, P.E. Counsel for DEF has reviewed Mr. Mara's testimony and exhibits and confirmed that they do not contain information that DEF considers to be confidential.

If you have any questions or concerns; please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Walter Trierweiler
Public Counsel

/s/ Mary A. Wessling
Mary A. Wessling
Associate Public Counsel
Florida Bar No. 093590

CERTIFICATE OF SERVICE
DOCKET NO. 20240025-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 21st day of June, 2024, to the following:

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/s/ Mary A. Wessling

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Duke Energy
Florida, LLC.

Docket No. 20240025-EI

Filed: June 11, 2024

DIRECT TESTIMONY

OF

KEVIN J. MARA, P.E.

ON BEHALF

OF

THE CITIZENS OF THE STATE OF FLORIDA

Walt Trierweiler
Public Counsel

Charles J. Rehwinkel
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*Attorneys for the Citizens
of the State of Florida*

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1 **DIRECT TESTIMONY**

2 **OF**

3 **KEVIN J. MARA**

4 On Behalf of the Office of Public Counsel

5 Before the

6 Florida Public Service Commission

7 DOCKET NO: 20240025-EI

8
9 **I. INTRODUCTION**

10 **Q. WHAT IS YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS?**

11 A. My name is Kevin J. Mara. My business address is 1850 Parkway Place, Suite 800,
12 Marietta, Georgia 30067. I am the Executive Vice President of the firm GDS Associates,
13 Inc. ("GDS") and Principal Engineer for a GDS company doing business as Hi-Line
14 Engineering. I am a registered engineer in Florida and 22 additional states.

15
16 **Q. PLEASE STATE YOUR PROFESSIONAL EXPERIENCE.**

17 A. I received a degree of Bachelor of Science in Electrical Engineering from Georgia Institute
18 of Technology in 1982. Between 1983 and 1988, I worked at Savannah Electric and Power
19 as a distribution engineer designing new services to residential, commercial, and industrial
20 customers. From 1989-1998, I was employed by Southern Engineering Company as a
21 planning engineer providing planning, design, and consulting services for electric
22 cooperatives and publicly-owned electric utilities. In 1998, I, along with a partner, formed
23 a new firm, Hi-Line Associates, which specialized in the design and planning of electric
24 distribution systems. In 2000, Hi-Line Associates became a wholly owned subsidiary of
25 GDS Associates, Inc. and the name of the firm was changed to Hi-Line Engineering, LLC.

1 In 2001, we merged our operations with GDS Associates, Inc., and Hi-Line Engineering
2 became a department within GDS. I serve as the Principal Engineer for Hi-Line
3 Engineering and am Executive Vice President of GDS. I have field experience in the
4 operation, maintenance, and design of transmission and distribution systems. I have
5 performed numerous planning studies for electric cooperatives and municipal systems. I
6 have prepared short circuit models and overcurrent protection schemes for numerous
7 electric utilities. I have also provided general consulting, underground distribution design,
8 and territorial assistance.

9

10 **Q. PLEASE DESCRIBE GDS ASSOCIATES, INC.**

11 A. GDS is an engineering and consulting firm with offices in Marietta, Georgia; Austin,
12 Texas; Auburn, Alabama; Bedford, New Hampshire; Augusta, Maine; Orlando, Florida;
13 Folsom, California, Redmond, Washington; and Madison, Wisconsin. GDS has over 180
14 employees with backgrounds in engineering, accounting, management, economics,
15 finance, and statistics. GDS provides rate and regulatory consulting services in the electric,
16 natural gas, water, and telephone utility industries. GDS also provides a variety of other
17 services in the electric utility industry including power supply planning, generation support
18 services, financial analysis, load forecasting, and statistical services. Our clients are
19 primarily publicly owned utilities, municipalities, customers of privately-owned utilities,
20 groups or associations of customers, and government agencies.

21

22 **Q. HAVE YOU TESTIFIED BEFORE ANY REGULATORY COMMISSIONS?**

23 A. I have submitted testimony before the following regulatory bodies:

24

- Vermont Department of Public Service

25

- Federal Energy Regulatory Commission ("FERC")

- 1 • District of Columbia Public Service Commission
- 2 • Public Utility Commission of Texas
- 3 • Maryland Public Service Commission
- 4 • Corporation Commission of Oklahoma
- 5 • Public Service Commission of South Carolina
- 6 • Florida Public Service Commission

7 I have also submitted expert opinion reports before United States District Courts in
8 California, South Carolina, and Alabama.

9

10 **Q. HAVE YOU PREPARED AN EXHIBIT DESCRIBING YOUR QUALIFICATIONS**
11 **AND EXPERIENCE?**

12 A. Yes. I have attached Exhibit KJM-1, which is a summary of my regulatory experience and
13 qualifications.

14

15 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

16 A. GDS was retained by the Florida Office of Public Counsel (“OPC”) to provide technical
17 assistance regarding Duke Energy Florida’s (“DEF” or “Company”) petition for a rate
18 increase. Accordingly, I am appearing on behalf of the Citizens of the State of Florida.

19

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

21 A. To address the projected capital spending for proposed transmission and distribution plant.

1 **Q. WHAT INFORMATION DID YOU REVIEW IN PREPARATION OF YOUR**
2 **TESTIMONY?**

3 A. I reviewed the Company’s filing, including the direct testimony and exhibits. I also
4 reviewed the Company’s responses to OPC’s discovery, the Company’s responses to the
5 Florida Public Service Commission (“PSC” or “Commission”) Staff’s discovery, and other
6 discovery materials pertaining to the case and its impacts on the Company.

7

8 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS BASED ON YOUR**
9 **REVIEW OF THE COMPANY’S TRANSMISSION AND DISTRIBUTION**
10 **INVESTMENT.**

11 A. Based on the limited time I and the OPC had to evaluate a rate case filing utilizing three
12 projected test years and a projected historical period (2024) and because of additional
13 onerous circumstances, I recommend that the transmission and distribution-related capital
14 costs be excluded from the 2026 and 2027 projected test years in this proceeding.

15

16 **Q. WHAT DO YOU MEAN BY “ADDITIONAL ONEROUS CIRCUMSTANCES”?**

17 A. In Docket NO. 20240026-EI, I filed testimony addressing a similar but more limited
18 situation of a single projected test year and two subsequent year adjustments for 2026 and
19 2027. Inexplicably, the testimony schedule for the Tampa case was established to require
20 my testimony to be filed on June 6, 2024, even though the hearing in that case is scheduled
21 after the DEF case hearing. I asked the OPC to seek relief from this situation. They did but
22 were ultimately unsuccessful in their efforts. The timing of the effort to prepare the Tampa
23 Electric testimony at the time depositions were being conducted limited my ability to fully
24 analyze the four projected years of the DEF filing. Nevertheless, I am able to make a high

1 level recommendation about the 2026 and 2027 proposed transmission and distribution
2 plant additions.

3

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. The purpose of my testimony is to address and make recommendations on specific issues
6 that affect the capital requirements for transmission and distribution infrastructure in this
7 proceeding effective for the 2025 test year and the requested fully projected 2026 and 2027
8 test years.

9

10 **II. TRANSMISSION AND DISTRIBUTION PLANT ADDITIONS FOR**
11 **PROPOSED 2026 AND 2027 PROJECTED TEST YEARS**

12 **Q. WHAT CAPITAL COSTS ARE INCLUDED IN THE PROJECTED TEST YEARS**
13 **FOR THE TRANSMISSION SYSTEM?**

14 A. The capital costs included in the 2025 test year and the 2026 and 2027 projected test years
15 are shown in Table 1 below:¹

Table 1: Transmission Actuals and Budgets

Dollars in \$ 1,000,000

Investment Category	2023 Actuals ²	2024 Forecast	2025 Forecast	2026 Forecast	2027 Forecast
Grid Servicing/Support	\$ 1.0	\$ 12.5	\$ 1.4	\$ 1.5	\$ 1.5
Growth	\$ 376.5	\$ 324.9	\$ 272.9	\$ 320.7	\$ 311.7
Physical Security	\$ 0.6	\$ 33.1	\$ 57.6	\$ 9.0	\$ 8.6
Regulatory	\$ 59.2	\$ 50.1	\$ 4.3	\$ 4.4	\$ 4.0
Reliability	\$ 73.0	\$ 157.9	\$ 167.6	\$ 80.6	\$ 81.6
Total	\$ 510.3	\$ 578.5	\$ 503.8	\$ 416.2	\$ 407.3

16

17 The total projected cost for the 2026 and 2027 projected test years combined is \$823.5
18 Million.

¹ Response to OPC's First Set of Interrogatories, No. 55.

² I am aware that the 2023 balances were part of the budget at the time the Minimum Filing Requirement ("MFR") schedule were prepared in this case. Despite the uncertainty about finality of the 2023 balance and inclusion of true actuals in the MFRs, I am treating these dollars as actual in reliance on OPC's First Set of Interrogatories, No. 55.

1 **Q. IN YOUR OPINION, SHOULD THE CAPITAL COSTS FOR THE 2026 AND 2027**
2 **PROJECTED TEST YEARS BE INCLUDED IN THIS PROCEEDING?**

3 A. No. Based on my expertise and the limited amount of time to conduct an in-depth analysis,
4 I recommend that the costs for the 2026 and 2027 projected test years should be excluded
5 from this proceeding. When budgeting, construction costs become more difficult and more
6 uncertain to predict as the projections extended further into the future. For 2024 and 2025,
7 these short term costs are relatively certain and have been used for singular future test years
8 in Florida in prior proceedings. However, broad budgets and forecast elements and
9 assumptions related to growth and reliability are inherently uncertain to predict in the future
10 and should not be relied upon for rate making purposes.

11

12 **Q. ARE THESE TRANSMISSION COSTS NOT A PART OF A FIXED BUDGET?**

13 A. No. The transmission upgrades and modifications stem from the Confidential September
14 2023 Transmission Addition Plan.³ This document specifically states:

15 It should be noted that this document represents a plan and not a
16 commitment to build. Furthermore, note that the Planned Dates
17 listed for each project are the Requested In-Service Dates (ISD), and
18 are subject to change due to challenges based on weather events,
19 capital allocations, operational clearances, permitting, and routing,
20 etc.⁴

21 From this statement it is clear the transmission budgets are not fixed. These budgets are
22 subject to change both in terms of commitment to build and the in-service date which are
23 vital for projected test years.

³ Response to OPC's First Set of Interrogatories, No. 55.

⁴ Response to OPC's First Set of Interrogatories, No. 55, Confidential 2023 TAP, page 4.

1 **Q. HOW FLUID ARE THE COMPANY’S TEST YEAR PLANT ADDITION**
2 **NUMBERS REGARDING THE COMPLETION OF TRANSMISSION PROJECTS**
3 **WITHIN THE BUDGETS’ YEARS?**

4 A. The completion of the transmission projects varies significantly especially when trying to
5 project a specific future year for completion. The confidential 2023 Transmission Addition
6 Plan⁵ (“TAP”) has 23 transmission projects scheduled to be completed in 2026 and 2027
7 which is 3 to 4 years into the future at the time the case was prepared. For comparison, I
8 considered the 2021 TAP⁶ which had 22 projects projected to be completed between 2023
9 and 2026 which coincides with 2 to 4 years into the future. When these projects from the
10 2021 TAP are compared to the 2023 TAP, only 8 had the same completion date, 10 were
11 delayed by one or more years, 6 projects in the 2023 TAP were not included in the 2021
12 TAP, and 3 projects from 2021 were simply canceled or deleted.

13
14 **Q. BASED ON YOUR COMPARISON OF THE 2021 TAP TO THE 2023 TAP, WHAT**
15 **IS YOUR CONCLUSION?**

16 A. The transmission projects and completion dates are ever-changing. Even when
17 considering the transmission plans are only two years apart, only 36% of the 2021 projects
18 to be installed 2 to 4 years in the future were completed or projected to be completed in the
19 same year. Delays or cancellations occurred. In addition, new projects appeared. This
20 means that the distant projected test years cannot be expected to accurately contain a fixed
21 set of projects. The evidence of the fluid nature of the transmission plans shows that there
22 is too much uncertainty in the projects to be completed 3 to 4 years into the future to rely
23 on future budgets for estimating rate base capital expenditure.

⁵ Response to OPC’s First Set of Interrogatories, No. 55, Confidential 2023 TAP.

⁶ Response to OPC’s First Set of Interrogatories, No. 55, Confidential 2021 TAP.

1 **Q. WHAT CAPITAL COSTS ARE INCLUDED IN THE PROJECTED TEST YEARS**
2 **FOR THE DISTRIBUTION SYSTEM?**

3 A. The capital costs for the distribution system included in the 2025 projected test year and
4 for the 2026 and 2027 projected test years are shown in Table 2 below:⁷
5

Table 2: Distribution System Actuals and Budgets

Dollars in \$ 1,000,000

Distribution Program	2023 Actual ⁸	2024 Forecasted	2025 Forecasted	2026 Forecasted	2027 Forecasted
Expansion	\$ 199.0	\$ 109.6	\$ 191.2	\$ 196.0	\$ 200.9
Restore	\$ 33.9	\$ 25.7	\$ 26.3	\$ 27.0	\$ 27.7
Maintenance	\$ 240.2	\$ 269.9	\$ 184.0	\$ 135.4	\$ 143.0
Major Projects	\$ 102.0	\$ 167.6	\$ 170.4	\$ 212.1	\$ 204.0
Total	\$ 575.1	\$ 572.8	\$ 571.9	\$ 570.5	\$ 575.6

6

7 The total distribution cost for the 2026 and 2027 projected test years combined is \$1.146
8 billion.

9

10 **Q. IN YOUR OPINION, SHOULD THE DISTRIBUTION CAPITAL COSTS FOR 2026**
11 **AND 2027 PROJECTED TEST YEARS BE INCLUDED IN THIS PROCEEDING?**

12 A. No. Based on my expertise and the limited amount of time to conduct an in-depth analysis,
13 I recommend that the distribution costs for the 2026 and 2027 projected test years should
14 be excluded for this proceeding. The reason for advocating the exclusion of the future
15 distant projected test years is that the costs that far into the future cannot be known with
16 any degree of certainty. The number of new customers, growth in system demand, and the
17 amount of restoration cannot be accurately projected. Some high level assumptions can be
18 made for budgeting purposes, but that level of detail is insufficient for the purpose of rate

⁷ Response to OPC Interrogatory No. 55.

⁸ See discussion in footnote 2.

1 making. For instance, I have observed that the increase in the budgets for 2026 and 2027
2 for expansion and restoration is simply a 2.5% increase of the prior year. An inflationary
3 increase is not sufficient when considering the investment for expansion of new services
4 and actual plant additions. These amounts can vary from year to year, as is clearly shown
5 in the difference between the years 2023 and 2024 in Table 2 above.

6

7 **Q. HOW HAVE SUPPLY CHAIN AND INFLATIONARY COSTS IMPACTED**
8 **DISTRIBUTION PROJECTS?**

9 A. In recent years, the electric power industry has struggled with a combination of supply
10 chain shortages and inflationary pressures on material. For example, transformers have
11 been in short supply with lead times up to 2 years and price increases of 4 to 9 times in the
12 past three years.⁹ Also, other equipment such as some types of pad-mounted switchgear
13 have a lead time of over 52 weeks and random material such as anchors, and lightning
14 arresters have also been in short supply. DEF has already acknowledged the negative
15 impact that supply chain issues can have on the Company's ability to execute its plans.¹⁰
16 Another example is based on the Handy-Whitman Index which is an inflation index that
17 provides a cost index for every year for different types of FERC's Uniform System of
18 Accounts compared to a base year. For distribution components in the South Atlantic
19 market, the index shows significant fluctuations in costs since 2021 and the first quarter of
20 2023.¹¹ There has been settling of prices for many of the components and currently the
21 Department of Energy is working on national standards on distribution transformers in an
22 effort to reduce supply chain constraints.¹² The volatility of these prices does not make it

⁹ NREL, *Major Drivers of Long-Term Distribution Transformer Demand*, February 2024.

¹⁰ Response to OPC's Sixth Set of Interrogatories, No. 118; Vanessa Goff Deposition taken May 20, 2024, page 40, Lines 4-61; Vanessa Goff Late-Filed Deposition Exhibit No. 4.

¹¹ Handy-Whitman index for January 2023, South Atlantic Region.

¹² DOE and Industry Team Up to Keep the Lights on for America, February 22, 2024, <https://www.energy.gov/oe/articles/doe-and-industry-team-keep-lights-america>

1 possible to predict costs 3 to 4 years into the future which is what the 2026 and 2027
2 projected test years represent. This reflects a significant amount of uncertainty regarding
3 the projections provided by DEF.

4

5 **Q. IN YOUR OPINION, SHOULD THE TRANSMISSION AND DISTRIBUTION**
6 **RELATED CAPITAL COSTS FOR THE PROJECTED 2026 AND 2027 TEST**
7 **YEARS BE INCLUDED IN THIS PROCEEDING?**

8 A. No. The distribution costs for 2026 and 2027 should be excluded for this proceeding.

9

10 **Q. IN YOUR OPINION, SHOULD THE TRANSMISSION AND DISTRIBUTION**
11 **RELATED CAPITAL COSTS FOR THE PROJECTED 2025 TEST YEAR BE**
12 **INCLUDED IN THIS PROCEEDING?**

13 A. I have not formed an opinion about 2025. My silence on this year should not be deemed an
14 endorsement of the projected transmission and distribution additions that DEF proposed in
15 the early part of 2023 for inclusion in 2025.

16

17 **Q. WILL YOU UPDATE YOUR DIRECT TESTIMONY BASED ON INFORMATION**
18 **THAT BECOMES AVAILABLE?**

19 A. Yes. I reserve the right to revise my recommendations via supplemental testimony should
20 new information not previously provided by the Company, or other sources, become
21 available.

22

23 **Q. DOES THIS COMPLETE YOUR PREFILED TESTIMONY?**

24 A. Yes, at this time. However, the compressed procedural schedule in this proceeding for
25 filing Intervenor testimony has limited the time to complete OPC's investigation into the

1 issues and effects of those issues on the Company's petition. Consequently, it is my
2 understanding that OPC reserves the right to file supplemental testimony to fully address
3 these issues and effects of those issues, if necessary.



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P.E.

CONTACT

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- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

EDUCATION

Bachelor of Science, Electrical
Engineering, Georgia Institute of
Technology, 1982

PROFESSIONAL AFFILIATIONS/ CERTIFICATIONS

Registered *Professional Engineer* in
Alabama, Arkansas, Georgia, Florida,
Idaho, Indiana, Kansas, Kentucky,
Louisiana, Michigan, Mississippi,
Missouri, North Carolina, Ohio,
Oregon, Pennsylvania, South Carolina,
South Dakota, Tennessee, Texas,
Virginia, Washington, and Wisconsin.

Institute of Electrical and Electronic
Engineers Power Engineering Society:
Senior Member

National Electric Safety Code
Subcommittee 5: Alternate Member

EXPERTISE

- Overhead & Underground
Distribution Design
- Distribution System Planning
- Power System Modeling & Analysis
- Training

PROFILE

Mr. Mara has over 30 years of experience as a distribution engineer. He worked six years at Savannah Electric as a Distribution Engineer and ten years with Southern Engineering Company as a Project Manager. At Savannah Electric, Mr. Mara gained invaluable field experience in the operation, maintenance, and design of transmission and distribution systems. While at Southern Engineering, Mr. Mara performed planning studies, general consulting, underground distribution design, territorial assistance, and training services. Presently, Mr. Mara is a Vice President at GDS Associates, Inc. and serves as the Principal Engineer for GDS Associates' engineering services company known as its trade name Hi-Line Engineering.

Overhead Distribution System Design. Mr. Mara is in responsible charge of the design of distribution lines for many different utilities located in a variety of different terrains and loading conditions. Mr. Mara is in responsible charge of the design of over 500 miles of distribution line conversions, upgrades, and line re-insulation each year. Many of these projects include acquisition of right-of-way, obtaining easements, and obtaining permits from various local, state and federal agencies. In addition, Mr. Mara performs inspections at various stages of completion of line construction projects to verify compliance of construction and materials with design specifications and applicable codes and standards.

Underground Distribution System Design. Mr. Mara has developed underground specifications for utilities and was an active participant on the Insulated Conductor Committee for IEEE. He has designed underground service to subdivisions, malls, commercial, and industrial areas in various terrains. These designs include concrete-encased ductlines, direct-burial, bridge attachments, long-bores, submarine, and tunneling projects. He has developed overcurrent and overvoltage protection schemes for underground systems for a variety of clients with different operating parameters.

TRAINING SEMINARS

Mr. Mara has developed engineering training courses on the general subject of distribution power line design. These seminars have become extremely popular with more than 25 seminars being presented annually and with more than 4,000 people having attended seminars presented by Mr. Mara. A 3-week certification program is offered by Hi-Line Engineering in eleven states. The following is a list of the training material developed and/or presented:

- Application and Use of the National Electric Safety Code
- How to Design Service to Large Underground Subdivisions
- Cost-Effective Methods for Reducing Losses/Engineering Economics
- Underground System Design
- Joint-Use Contracts – Anatomy of Joint-Use Contract
- Overhead Structure Design
- Easement Acquisition
- Transformer Sizing and Voltage Drop

Construction Specifications for Electric Utilities. Mr. Mara has developed overhead construction specifications including overhead and underground systems for several different utilities. The design included overcurrent protection for padmounted and pole mounted transformers. The following is a representative list of past and present clients:

- Cullman EMC, Alabama
- Blue Ridge EMC, South Carolina
- Buckeye REC, Ohio
- Little River ECI, South Carolina
- Lackland Air Force Base
- Maxwell Air Force Base

KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P.E.

SYSTEM PRIVATIZATION/EVALUATION

Central Electric Power Cooperative, Columbia, SC

- 2017 Independent Certification of Transmission Asset Valuation, Silver Bluff to N. Augusts 115kV
- 2015 Independent Certification of Transmission Asset Valuation, Wadmaw 115kV

Choctawhatchee Electric Cooperative, DeFuniak Springs, FL

- Inventory and valuation of electrical system assets at Eglin AFB prior to 40-year lease to private-sector entity.

PUBLICATIONS

- Co-author of the NRECA "Simplified Overhead Distribution Staking Manual" including editions 2, 3 and 4.
- Author of "Field Staking Information for Overhead Distribution Lines"
- Author of four chapters of "TVPPA Transmission and Distribution Standards and Specifications"

TESTIMONIES & DEPOSITIONS

Mr. Mara has testified as an expert at trial or by deposition in the following actions.

- *Deposition related to condemnation of property*, Newberry ECI v. Fretwell, 2005, State of South Carolina
- *Testimony in Arbitration regarding territory dispute*, Newberry ECI v. City of Newberry, 2003, State of South Carolina, Civil Action No. 2003-CP-36-0277
- *Expert Report and Deposition, 2005*, United States of America v. Southern California Edison Company, Case No CIV F-01-5167 OWW DLB
- *Expert Report and Deposition, 2005*, Contesting a transmission condemnation, Moore v. South Carolina Electric and Gas Company, United States District Court of South Carolina, Case No. 1:05-1509-MBS
- *Affidavit October 2007*, FERC Docket No. ER04-1421 and ER04-1422, Intervene in Open Access Transmission Tariff filed by Dominion Virginia Power
- *Affidavit February 26, 2008*, FERC Docket No. ER08-573-000 and ER08-574-000, Service Agreement between Dominion Virginia Power and WM Renewable Energy, LLC
- *Direct Filed Testimony* date December 15, 2006, before the Public Utility Commission of Texas, SOAH Docket No 473-06-2536, PUC Docket No. 32766
- *Expert Report and Direct Testimony* April 2008, United States Tax Court, Docket 25132-06, Entergy Corporation v. Commissioner Internal Revenue
- *Direct Testimony* September 17, 2009, Public Service Commission of the District of Columbia, Formal Case 1076, Reliability Issues
- *Filed Testimony regarding the prudence of hurricane restoration costs on behalf of the City of Houston, TX*, 2009, Cozen O'Connor P.C., TX PUC Docket No. 32093 – Hurricane Restoration Costs
- *Technical Assistance and Filed Comments regarding line losses and distributive generation, interconnection issues*, 2011, Office of the Ohio Consumer's Counsel, OCC Contract 1107, OBM PO# 938 for Energy Efficiency T & D

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TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 15941* concerning worst reliable feeders in the District of Columbia, 2011, 2012 Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Assistance, Filed Comments, and Recommendations on proposed rulemaking by the District of Columbia PSC amending the Electric Quality of Service Standards (EQSS)*, 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Yearly Technical Review, Filed Comments, and Recommendations evaluating Pepco's Annual Consolidated Report* for 2011 through 2021, Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766; 766-ACR; PEPACR(YEAR)
- *Technical Evaluation, Filed Comments, and Recommendations evaluating Pepco's response to a major service outage occurring May 31, 2011.* (2011), Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766 and 1062
- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 164261 concerning worst reliable neighborhoods in the District of Columbia*, 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Review, Filed Comments, and Recommendations on Pepco's Incident Response Plan (IRP) and Crisis Management Plan (CMP)*, 2011, Office of the People's Counsel of the District of Columbia
- Formal Case No. 766
- *Technical Assistance, Filed Comments, and Recommendations assessing Pepco's Vegetation, Management Program and trim cycle* in response to Oder 16830, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Review, Filed Comments, and Recommendations on Pepco's Secondary Splice Pilot Program* in response to Order 16426, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766 and 991
- *Technical Review, Filed Comments, and Recommendations on Pepco's Major Storm Outage Plan (MSO)*, 2012 – active, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2011-2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 1087 – Pepco 2011 Rate Case, Hearing transcript date: February 12, 2012.
- *Evaluation of and Filed Comments on Pepco's Storm Response*, 2012, Office of the People's Counsel of the District of Columbia, Storm Dockets SO-02, 03, and 04-E-2012
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2013 – 2014, Office of the People's Counsel of the District of Columbia, Formal Case No. 1103 – Pepco 2013 Rate Case. Hearing transcript date: November 6, 2013.
- *Evaluation of and Filed Comments on Prudency of 2011 and 2012 Storm Costs*, 2013 – 2014, State of New Jersey Division of Rate Counsel, BPU Docket No. AX13030196 and EO13070611



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TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance and Direct Filed Testimony for DTE Acquisition of Detroit Public Lighting Department*, 2013 – 2014, Office of the State of Michigan Attorney General, Docket U-17437, Evaluation of and Filed Comments on the Siemens Management Audit of Pepco System Reliability and the Liberty Management Audit, 2014, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1076
- *Expert witness for personal injury case*, District of Columbia, Koontz, McKenney, Johnson, DePaolis & Lightfoot LLP, Ghafoorian v Pepco 2013 – 2016, Plaintive expert assistance regarding electric utility design. operation of distribution systems and overcurrent protection systems.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Application for approval of the Triennial Underground Infrastructure Improvement Projects Plan*, 2014 – 2017, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1116
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC and New Special Purpose Entity*, LLC, 2014 – 2016, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1119. Hearing transcript date: April 21, 2015.
- *Technical Assistance to Inform and advise the OPC in the matter of the investigation into modernizing the energy delivery system for increased sustainability*. 2015 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No 1130.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc.*, 2014 – 2016, State of Maryland and the Maryland Energy Administration, Case No. 9361.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2015 – 2016, State of Oklahoma Office of the Attorney General, Cause No. PUD 201500273 - OG&E 2016 Rate Case, Hearing transcript date: May 17, 2016.
- *Technical Assistance and Filed Comments on Notice of Inquiry, The Commission’s Investigation into Electricity Quality of Service Standards and Reliability Performance*, 2016 – 2018, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1076; RM36-2016-01-E.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2016 – 2017, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1139 – Pepco 2016 Rate Case. Hearing transcript date: March 21, 2017.
- *Technical Assistance in the Matter of the Application for approval of the Biennial Underground Infrastructure Improvement Projects Plan*, 2017- active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1145
- *Technical Assistance to Inform and advise the OPC Regarding Pepco’s Capital Grid Project*, 2017 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1144. Confidential Comments and Confidential Affidavit filed November 29, 2017.
- *Expert witness for personal injury case Mecklenburg County, NC, Tin, Fulton, Walker & Owen, PLLC, Norton v Duke, Witness testimony* December 1, 2017, Technical assistance and pre-filed Direct Testimony on behalf of the Joint Municipal Intervenors in a rate case before the Indiana Utility Regulatory Commission, Cause No. 44967. Testimony filed November 7, 2017.
- *Prefiled Direct Testimony and Prefiled Surrebuttal Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Tariff Filing of Green Mountain Power Corp.*, Case No. 18-0974-TF. Direct Testimony Filed August 10, 2018. Surrebuttal Testimony Filed October 8, 2018.



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TESTIMONIES & DEPOSITIONS [continued]

- *Technical assistance and pre-filed Direct Testimony on behalf of McCord Development, Inc. and Generation Park Management District against CenterPoint Energy Houston Electric, LLC in a case before the State Office of Administrative Hearings of Texas, TX PUC Docket No. 48583. Direct Testimony filed April 5, 2019.*
- *Technical Assistance, Direct Filed Testimony, Rebuttal Testimony, Surrebuttal Testimony, and Supplemental Testimony for fully litigated rate case, 2019 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1156 – Pepco 2019 Rate Case. Direct Testimony Filed March 6, 2020. Rebuttal Testimony Filed April 8, 2020. Surrebuttal Testimony Filed June 1, 2020. Supplemental Testimony filed July 27, 2020.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Docket No. 20200071-EI, Gulf Power SPP. Direct Testimony filed May 26, 2020, Florida Power& Light Company SPP. Direct Testimony filed May 28, 2020.*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its climate Plan pursuant to the Multi-Year Regulation Plan, Case No. 20-0276-PET. Direct Testimony Filed May 29, 2020.*
- *Technical assistance and Filed Comments on behalf of East Texas Electric Cooperative on a Proposal for Publication by the Public Utility Commission of Texas on Project 51841 Review of 16 TAC § 25.53 Relating to Electric Service Emergency Operations Plans, Project 51841. Comments filed January 4, 2022.*
- *Technical assistance, filed affidavit and direct testimony on behalf of Bloomfield, NM in an action concerning Bloomfield’s exercise of its right to acquire from Farmington the electric utility system serving Bloomfield, Bloomfield v Farmington, NM. State of New Mexico, County of San Juan, Eleventh Judicial District Court Action No. D-1116-CV-1959-07581.*
- *Technical assistance and pre-filed Direct Testimony on behalf of Sawnee EMC in a territorial dispute with Electrify America, Public Service Commission State of Georgia, Sawnee Electric Membership Corporation v Georgia Power Corporation, Docket No. 43899. Direct Testimony Filed September 9, 2021*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of a Multi-Year Rate Plan pursuant to 30 V.S.A. Sections 209, 218, and 218d, Case No. 21-3707-PET. Direct Testimony Filed April 20, 2022.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plans pursuant to Rule 25-6.030, F.A.C., all testimony filed May 31, 2022*
 - Docket No. 20220048-EI Tampa Electric Company
 - Docket No. 20220049-EI Florida Public Utilities Company
 - Docket No. 20220050-EI Duke Energy Florida
 - Docket No. 20220051-EI Florida Power & Light
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plan Cost Recovery Clause, Docket No. 20220010-EI. Testimony filed September 2, 2022*



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TESTIMONIES & DEPOSITIONS [continued]

- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its zero outages initiative as a strategic opportunity pursuant to 30 V.S.A. § 218d and GMP's multi-year rate plan, Case No. 23-3501-PET. Direct Testimony Filed March 15, 2021.*
- *Prefiled Direct Testimony and Rebuttal Testimony on behalf of South Carolina Office of Regulatory Staff with the Public Service Commission of South Carolina, regarding Duke Energy Carolinas, LLC's Application for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order, Docket No. 2023-388-E and 2023-403-E. Direct Testimony Filed April 8, 2024. Rebuttal Testimony Filed April 29, 2024.*

