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DANIEL PEREZ
*Speaker of the House of
Representatives*

March 12, 2025

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

**Re: Docket No. 20250017-EI
Florida Public Utilities Company 2026-2035 Storm Protection Plan**

Dear Mr. Teitzman:

Please find enclosed for filing in the above referenced docket the Direct Testimony and Exhibits of Kevin J. Mara. This filing is being made via the Florida Public Service Commission's web-based electronic filing portal.

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

Sincerely,

Walt Trierweiler
Public Counsel

/s/Charles J. Rehwinkel
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CERTIFICATE OF SERVICE
DOCKET NOS. 20250014-EI, 20250015-EI,
20250016-EI, and 20250017-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 12th day of March, 2025, to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.

DOCKET NO.: 20250014-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

DOCKET NO.: 20250015-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

DOCKET NO.: 20250016-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.

DOCKET NO.: 20250017-EI

FILED: March 12, 2025

DIRECT TESTIMONY

OF

KEVIN J. MARA, P.E.

ON BEHALF OF 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. 20250017-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 professional engineer (P.E.) in Florida and 22 additional
15 states.

16

17 **Q. PLEASE STATE YOUR PROFESSIONAL EXPERIENCE.**

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

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

10

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

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

22

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

24 A. Yes, I have submitted testimony before the following regulatory bodies:

25

- Vermont Department of Public Service;

- 1 • Federal Energy Regulatory Commission (“FERC”);
- 2 • District of Columbia Public Service Commission;
- 3 • Public Utility Commission of Texas;
- 4 • Maryland Public Service Commission;
- 5 • Corporation Commission of Oklahoma;
- 6 • Public Service Commission of South Carolina; and
- 7 • Florida Public Service Commission.

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

10

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

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

15

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

17 A. GDS was retained by the Florida Office of Public Counsel (“OPC”) to provide technical
18 assistance and expert testimony regarding the Florida Public Utilities Company’s (“FPUC”
19 or “Company”) 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, Florida
20 Administrative Code (“F.A.C.”). Accordingly, I am appearing on behalf of the Citizens of
21 the State of Florida. Accordingly, I am appearing on behalf of the Citizens of the State of
22 Florida.

23

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

25 A. I am presenting my expert opinion regarding the reasonableness of FPUC’s proposed

1 2026-2035 Storm Protection Plan (“SPP” or “Plan”) and its consistency with the applicable
2 standards for the Commission to consider the SPP.

3 The fact that I do not address any specific element of the company’s SPP or address
4 any other particular issues in my testimony or am silent with respect to any portion of the
5 company’s direct testimony in this proceeding should not be interpreted as an approval of
6 any position taken by that company in the testimony to which I have had an opportunity to
7 respond.

8

9 **Q. WHAT INFORMATION DID YOU REVIEW IN PREPARATION OF YOUR**
10 **TESTIMONY?**

11 A. I reviewed the Company’s filing, including the direct testimony and exhibits. I also
12 reviewed the Company’s responses to OPC’s discovery (including deposition testimony),
13 the Company’s responses to the Florida Public Service Commission (“PSC” or
14 “Commission”) Staff’s discovery, and other materials pertaining to the SPP and its impacts
15 on the Company. In addition, I reviewed section 366.96, Florida Statutes (“F.S.”), which
16 requires the filing of the SPP and authorized the Commission to adopt the relevant rules,
17 including Rule 25-6.030, F.A.C., which addresses the Commission's approval of a
18 Transmission and Distribution SPP that covers a utility's immediate 10-year planning
19 period.

20

21 **Q. PLEASE DESCRIBE HOW THE REMAINDER OF YOUR TESTIMONY IS**
22 **ORGANIZED.**

23 A. I have focused my testimony on the new Distribution Connectivity and Automation
24 Program proposed by FPUC in the 2026 SPP.

1 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

2 A. In summary, I recommend that the Distribution Connectivity and Automation Program
3 should be excluded from the SPP due to redundancy and for non-compliance with the filing
4 requirements.

5
6 **II. DISCUSSION**

7 **Q. WITH REGARD TO THE FLORIDA SUPREME COURT’S 2024 DECISION IN**
8 **CITIZENS OF STATE V. FAY, 396 SO. 3D 549 (FLA. 2024), THAT A PRUDENCE**
9 **OR COST EFFECTIVENESS DETERMINATION WAS NOT REQUIRED AND**
10 **THUS NOT A PROPER SUBJECT OF INTERVENOR TESTIMONY, WAS**
11 **THERE ANY ANALYSIS THAT YOU BELIEVED WAS THUS BARRED THAT**
12 **WOULD HAVE OTHERWISE BEEN HELPFUL OR NECESSARY TO THE**
13 **COMMISSION TO DETERMINE WHETHER THE SPP OF FPUC IS IN THE**
14 **PUBLIC INTEREST AND MEETS THE INTENT OF THE LEGISLATURE AS**
15 **EXPRESSED IN THE SPP STATUTE?**

16 A. Rule 25-6.030, F.A.C., (“SPP Rule”) sets forth comprehensive requirements for a utility’s
17 storm protection plan. Specifically, Rule 25-6.030(3)(d)(1), F.A.C., and Rule 25-
18 6.030(3)(d)(3), F.A.C., call for benefit and cost estimates for each program within the plan,
19 and Rule 25-6.030(3)(d)(4), F.A.C., calls for cost to benefit comparison for each program.
20 In light of the Florida Supreme Court’s interpretation of section 366.96, F.S., and the SPP
21 Rule, I believe it is necessary for me to express my opinion that without the requirement of
22 an up-front prudence or cost-effectiveness determination, consumers are at risk of exposure
23 to runaway budgets and expenditures over the life of these plans. With no evidence allowed
24 or taken on prudence or cost effectiveness, substantial changes in SPP programs and
25 program budgets may be overlooked and may not be considered resulting in an increased

1 burden on the rate payers. This scenario effectively cuts the commission off from
2 determining whether enormous sums of money are being spent to achieve diminishing
3 returns both in the form of benefits to customers and in the interest of State of Florida as a
4 whole.

5 Specifically, as the table below illustrates, analysis of the estimated budgets for
6 FPUC's Distribution Overhead Feeder Hardening Program for 2026 through 2028 shows
7 the 3-year budget increased from \$5.6 million in 2022, to almost \$20 million in 2025.
8 FPUC originally had a slow roll-out of the Overhead Feeder Hardening Program. The
9 Program is on track to complete in 10 years. The Office recommends FPUC not accelerate
10 the Program as it will be difficult to justify this increase to the stakeholders.

Table 1

FPUC OVERHEAD FEEDER HARDENING PROGRAM				
(in Millions)				
	2026	2027	2028	TOTAL
2022 PROGRAM BUDGETS	2.57	1.51	1.51	5.59
2025 PROGRAM BUDGETS	6.66	6.66	6.60	19.92

11
12 **Q. DO YOU HAVE AN UNDERSTANDING OF THE INFORMATION THE**
13 **COMMISSION USES TO EVALUATE A FILED SPP?**

14 **A.** Yes. In PSC ruling for the prior SPP, the PSC states the information used to evaluate a plan
15 is contained in Subsection 366.96(4), F.S., which provides:

16 (4) In its review of each transmission and distribution storm protection plan
17 filed pursuant to this section, the commission shall consider:

18
19 (a) The extent to which the plan is expected to reduce
20 restoration costs and outage times associated with extreme
21 weather events and enhance reliability, including whether
22 the plan prioritizes areas of lower reliability performance.
23

1 (b) The extent to which storm protection of transmission and
2 distribution infrastructure is feasible, reasonable, or
3 practical in certain areas of the utility's service territory,
4 including, but not limited to, flood zones and rural areas.
5

6 (c) The estimated costs and benefits to the utility and its
7 customers of making the improvements proposed in the
8 plan.

9 (d) The estimated annual rate impact resulting from
10 implementation of the plan during the first 3 years addressed
11 in the plan.¹
12

13 **Q. WHAT ELEMENTS DOES RULE 25-6.030(3), F.A.C., REQUIRE FOR A**
14 **PROGRAM TO BE INCLUDED IN A SPP?**

15 A. Rule 25-6.030(3), F.A.C., requires a utility to provide the following key components: a
16 description of the utility's service area, including areas prioritized for enhancement and
17 any areas where the utility determined that enhancement of the utility's existing
18 transmission and distribution facilities would not be feasible, reasonable, or practical.²

19 Each SPP must contain:

20 (a) A description of how implementation of the proposed
21 Storm Protection Plan will strengthen electric utility
22 infrastructure to withstand extreme weather conditions...

23
24 (b) A description of how implementation of the proposed
25 Storm Protection Plan will reduce restoration costs and
26 outage times associated with extreme weather
27 conditions...
28

29 (c) A description of the utility's service area, including areas
30 prioritized for enhancement and any areas where the utility
31 has determined that enhancement of the utility's existing
32 transmission and distribution facilities would not be
33 feasible, reasonable, or practical. Such description must
34 include:

- 35
36
 - A general map of the area under consideration,
 - The number of customers served within each area,
37

¹ Docket No. 20220048-EI, Order No. PSC-2022-0388-FOF-EI, p. 6., Docket No. 20220051-EI Order No. PSC-2022-0389-FOF-EI, p. 6, Docket No. 20220049-EI, Order No. PSC-2022-0387-FOF-EI, p. 5., and Docket No. 20220050-EI, Order No. PSC-2022-0388-FOF-EI, p. 6.

² Docket No. 20220049-EI, Order No. PSC-2022-0387-FOF-EI, p. 11.

- Reasoning for areas prioritized for enhancement,
- Reasoning for areas deemed not suitable for enhancement.

(d) A description of each proposed storm protection program that includes:

1. A description of how each proposed storm protection program is designed to enhance the utility's existing transmission and distribution facilities including an estimate of the resulting reduction in outage times and restoration costs due to extreme weather conditions;
2. If applicable, the actual or estimated start and completion dates of the program;
3. A cost estimate including capital and operating expenses;
4. A comparison of the costs identified in subparagraph (3)(d)3. and the benefits identified in subparagraph (3)(d)1.; and
5. A description of the criteria used to select and prioritize proposed storm protection programs.

Q. CAN YOU DESCRIBE FPUC'S NEW PROGRAM IN THE SPP?

A. Yes. The program is referred to as the Distribution Connectivity and Automation Program which is supposed to enhance FPUC's ability to reroute power and leverage intelligent grid devices to isolate areas of damage and automatically reroute power.³ To achieve this goal, FPUC propose improvements to the topology of the Distribution System.⁴ In layman's terms, improvements to the topology means to construct additional feeder ties. During normal operation a feeder operates radially, meaning it extends outward from the substation and power flows out to the customers. To address emergencies, ties can be constructed between feeders and provide an alternate path for power to flow.

³ Direct Testimony of P. Mark Cutshaw, p. 5, lines 7-12.

⁴ Direct Testimony of P. Mark Cutshaw, p. 10, lines 18-22.

1 **Q. IS THE DISTRIBUTION CONNECTIVITY AND AUTOMATION DESIGN**
2 **SIMILAR TO A SINGLE CONTINGENCY DESIGN?**

3 A. Yes. A single contingency design allows for one component of the system to fail, and
4 remaining components can continue to provide power to whole system. For example,
5 Feeder 1 and can have a tie to Feeder 2. If a section of Feeder 1 fails, then the tie to Feeder
6 2 can be used to restore power to a portion of Feeder 1. FPUC's new Distribution
7 Connectivity and Automation Program is proposing to build new tie lines between feeders
8 to allow load transfers between interconnected feeders.

9
10 **Q. DO MOST UTILITIES USE THE SINGLE-CONTINGENCY OUTAGE**
11 **CRITERION IN THE PLANNING OF THEIR DISTRIBUTION SYSTEMS?**

12 A. Yes. In my experience working in Florida and in other jurisdictions I have observed that
13 utilities have a set of planning criteria for their distribution system which includes, to the
14 extent it is feasible, designing the system for single contingency outages.

15
16 **Q. DOES FPUC HAVE A SET OF PLANNING CRITERIA THAT INCLUDES A**
17 **SINGLE CONTINGENCY OUTAGE REQUIREMENT?**

18 A. No. I was surprised to learn that FPUC does not have a set of written planning criteria for
19 their distribution system for voltage limitations, thermal loading of system components, or
20 contingency limitations.⁵

21
22 **Q. DOES FPUC DESIGN THEIR SYSTEM FOR CONTINGENCIES?**

23 A. Yes. Regarding the design for single contingency design, FPUC stated, "These limitations

⁵ See Exhibit KJM-2, FPUC Response to OPC's First Set of Interrogatories, No. 10a.

1 would be addressed using standard distribution design techniques such as extending a new
2 distribution line to connect with a separate distribution line, installation of normally open
3 switches between separate distribution lines, etc.”⁶ Further FPUC stated, “Without
4 canvassing the entire system for instances of such interconnections, it is FPUC's belief that,
5 consistent with others in the industry, feeders have been interconnected where feasible and
6 practical.”⁷

7

8 **Q. WHAT IS YOUR UNDERSTANDING OF THE FOCUS OF THE DISTRIBUTION**
9 **CONNECTIVITY AND AUTOMATION PROGRAM?**

10 A. I understand the that a large percentage of the focus for the Distribution Connectivity and
11 Automation Program, in the early years, will be on establishing new feeder ties which
12 account for approximately 75% of the projected Program costs in the plan.⁸ Further, I
13 understand that FPUC has not developed the automation portion of the Program because
14 FPUC does not yet know the number of automated devices to be installed nor the details
15 of the communications.⁹

16

17 **Q. DOES THE PROGRAM MODIFY THE EXISTING SYSTEM?**

18 A. No. Mr. Cutshaw stated,

19 And one of the programs that we felt would be appropriate in certain areas is
20 to be able to construct the new feeder ties, and eventually, down the road,
21 install devices so that we could do exactly what the Storm Protection Plan
22 was designed to do, is reduce outages and speed up restoration times.¹⁰

⁶ *Id.*

⁷ See Exhibit KJM-3, FPUC Response to OPC’s First Set of Interrogatories, No. 10b.

⁸ See Exhibit KJM-5, FPUC Response to OPC’s First Set of Interrogatories, No. 11.

⁹ See Exhibit KJM-4, FPUC Response to OPC’s First Set of Interrogatories, Nos. 10f, g and h.

¹⁰ Deposition of Mark Cutshaw, March 4, 2025, p. 23.

1 The program focuses on constructing new feeder ties and eventually installing
2 devices to help automate the system.

3
4 **Q. IN YOUR OPINION DOES THE DISTRIBUTION CONNECTIVITY AND**
5 **AUTOMATION PROGRAM MEET THE CRITERIA FROM RULE 25-6.030,**
6 **F.A.C.?**

7 A. No. FPUC’s proposed Distribution Connectivity program is similar to the Duke Energy
8 Florida (DEF) proposed program in DEF’s application for their 2023 SPP. The DEF
9 program proposed tie lines between substations to provide redundancy. In that case, the
10 PSC ruled in Order No. PSC-2022-0388-FOF-EI, the Commission stated,

11 Rule 25-6.030(1)(a), F.A.C., defines a storm protection program as a
12 collection of projects that ‘enhance the utility’s *existing* infrastructure.’
13 Utility storm protection or hardening is a discretionary activity that goes
14 above and beyond the basic standard of service to strengthen a utility’s
15 existing infrastructure to withstand the potential for extreme weather.
16 Therefore, we must consider whether a program in a SPP is a common
17 utility activity or meets the intent of Section 366.96, F.S. As proposed in
18 DEF’s current SPP, the Transmission LRFS Program involves the
19 construction of new redundant infrastructure, rather than the enhancement
20 or hardening of existing facilities. While we agree that such activity may
21 enhance a utility’s transmission system for reliability purposes, it does not
22 strengthen existing system facilities for storm hardening purposes.
23 Therefore, this new and redundant infrastructure project should be excluded
24 from its SPP.¹¹

25
26 (Emphasis added.)

27 FPUC stated that feeder interconnections where feasible and practical have already
28 been installed.¹² Thus any additional ties would not be practical. Further, FPUC has not
29 developed the concept of the Program enough to describe the communication of the
30 automation system nor the number or type of devices to be used in the proposed system.

¹¹ Docket No. 20220050-EI, Order No. PSC-2022-0388-FOF-EI, p. 18.

¹² See Exhibit KJM-3, FPUC Response to OPC’s First Set of Interrogatories, No. 10b.

1 Also, FPUC failed to comply with Rule 25-6.030(3)(c), F.S., by not providing a
2 general map for the program, the number of customers served by the program, nor a
3 designation of any areas of the system not feasible, reasonable, or practical.

4 For all these reasons, the new Distribution Connectivity and Automation Program
5 should be excluded from FPUC's SPP.

6

7 **Q. ARE THERE ANY OTHER ELEMENTS OF THE FILING AND OR**
8 **INFORMATION PROVIDED THAT YOU BELIEVE THAT COMMISSION**
9 **SHOULD TAKE INTO ACCOUNT FOR FPUC'S SPP?**

10 A. Yes. In several instances, the SPP FPUC witness Cutshaw submits as Exhibit PMC-01,
11 contains references to "prudent," or "prudently." In accord with the aforementioned
12 Florida Supreme Court decision, I will not substantively respond to these testimonies on
13 that issue. However, if the Commission allows the Company to nevertheless introduce the
14 concept of "prudence" in the decision making, I believe it would be necessary for me to
15 provide supplemental testimony in that regard.

16

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

18 A. Yes, it does.



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.



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 Rural Electric Cooperative, Ohio
- Three Notch EMC, Georgia
- Little River ECI, South Carolina
- Lackland Air Force Base
- Maxwell Air Force Base

CONTACT

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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

Past Member: Insulated Conductor Committee

EXPERTISE

Overhead & Underground Distribution Design

Distribution System Planning

Power System Modeling & Analysis

Training



KEVIN MARA

Docket No. 20250017-EI
Curriculum Vitae
Exhibit KJM-1
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EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.

CONTACT

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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, Wadmalaw 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-o1-5167 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 2024, 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, Plaintiff 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.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Duke Energy Florida, LLC, Docket No. 20240025-EI. Direct Testimony filed June 11, 2024.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Tampa Electric Company, Docket No. 20240026-EI. Direct Testimony filed June 6, 2024.*



INTERROGATORY NO. 10a (i-iii)

10. With respect to Distribution Connectivity and Automation, please answer the following:
- a. Provide FPUC current distribution planning criteria for expansion of the system due to load growth such as:
 - i. Voltage limitations,
 - ii. Thermal limitations, and
 - iii. Contingency limitations.

Company Response: FPUC objects to this interrogatory and its individual subparts as they seek information irrelevant to FPUC's SPP and unlikely to lead to the discovery of relevant admissible information. Notwithstanding these objections and without waiving them, the Company provides the following information:

i. FPUC does not currently have any documented distribution planning criteria for expansion due to load growth resulting in voltage limitations. However, FPUC does consistently monitor voltage conditions on the distribution system and, if conditions indicate issues exist, the issues would be addressed using standard distribution equipment such as load tap changers, regulators, capacitors, feeder balancing, etc.

ii. FPUC does not currently have any documented distribution planning criteria for expansion due to load growth resulting in thermal limitations. However, FPUC does consistently monitor load and current flow conditions on the distribution system and, if conditions indicate issues exist, the issues would be addressed using standard distribution equipment such as capacitors, feeder balancing, conductor reconductoring, etc.

iii. FPUC does not currently have any documented distribution planning criteria for expansion due to load growth resulting in contingency limitations. However, FPUC has consistently performed

INTERROGATORY NO. 10a (i-iii), cont.

system design in a manner that provides for contingency conditions when practical. These limitations would be addressed using standard distribution design techniques such as extending a new distribution line to connect with a separate distribution line, installation of normally open switches between separate distribution lines, etc.

Respondent: *Mark Cutshaw*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities
Company.

DOCKET NO. 20250017-EI

DATED: FEBRUARY 26, 2025

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the Office of Public Counsels First Set of Interrogatories to Florida Public Utilities Company (Nos. 1 - 14) in Docket No. 20250017-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

P. Mark Cutshaw

(P. Mark Cutshaw), Declarant

Dated: February 26, 2025

INTERROGATORY NO. 10b (i-ii)

- b. Historically has FPUC built tie lines between feeders or reconducted lines between feeders prior to the FPUC's first SPP?
- i. If so, provide examples of capital projects used to provide backup capacity to an adjacent feeder built between 2010 and 2023.
 - ii. Include, separately by project, the actual costs of each these projects and the miles of line of each.

Company Response: FPUC objects to this interrogatory and its individual subparts as they seek information irrelevant to FPUC's SPP and unlikely to lead to the discovery of relevant admissible information. Moreover, subpart (b)(i), which seeks information on capital projects as far back as 2010, is not only irrelevant but unduly burdensome to the Company. It appears to be a fishing expedition rather than a question designed to seek information about FPUC's proposed SPP. Notwithstanding these objections and without waiving them, the Company provides the following information:

- b. Without canvassing the entire system for instances of such interconnections, it is FPUC's belief that, consistent with others in the industry, feeders have been interconnected where feasible and practical. However, such actions would have been performed as part of establishing new service connections as FPUC has not historically initiated such projects independently.
- i. FPUC does not have readily available examples for the specified time frame.
 - ii. See response to (b)(i) above.

Respondent: *Mark Cutshaw*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities
Company.

DOCKET NO. 20250017-EI

DATED: FEBRUARY 26, 2025

DECLARATION

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Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

P. Mark Cutshaw

(P. Mark Cutshaw), Declarant

Dated: February 26, 2025

INTERROGATORY NO. 10e – h(i.-ii)

- e. Provide the number of reclosing fuses (reference page 31 of the SPP) on laterals in use on the system prior to 2025.
- f. Provide the number of proposed three-phase and single-phase reclosers proposed for 2026-2028.
- g. Provide the number of proposed reclosing fuses for 2026-2028.
- h. Provide details of the distribution automation program include communication network, including, but not limited to:
 - i. The expenditure of the communication network for the years 2021-2023.
 - ii. The budgeted costs for the communication network for the years 2025-2028

Company Response: e. There are currently five (5) reclosing fuses in operation in the FPUC system.

f. None. Early focus of this program is on broadening connectivity between feeders.

g. None. Early focus of this program is on broadening connectivity between feeders.

h. The only documented details for the distribution automation program are included in “Section 3.4 - Distribution Connectivity and Automation” program filed with the Florida Public Utilities Company Storm Protection Plan 2026 -2035. The description addresses the communications network which are described as “peer to peer communications” as part of the device and does not include any type of SCADA communication network.

i. FPUC does not currently have a communication network associated with distribution automation.

ii. FPUC does not include any budgeted cost for a communication network associated with distribution automation within the years 2025-2028. The communications will involve the “peer to peer communications” as mentioned above.

Respondent: *Mark Cutshaw*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities
Company.

DOCKET NO. 20250017-EI

DATED: FEBRUARY 26, 2025

DECLARATION

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Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

P. Mark Cutshaw

(P. Mark Cutshaw), Declarant

Dated: February 26, 2025

INTERROGATORY NO. 11

11. If the Distribution Connectivity and Automation program is approved in the rate increase as part of Docket No. 202400099-EI, will FPUC fund or recover the Distribution Connectivity and Automation program through base rates.? If not, why not?

Company Response: FPUC objects to this interrogatory to the extent it makes an assumption with regard to facts not submitted as evidence in this case and is simply an incorrect assumption. Notwithstanding and without waiving this objection, the Company states that, in Docket No. 202400099-EI, a project related to a Self-Healing Network is included. However, the Self-Healing Network project is more limited and is different in scope than the Distribution Connectivity and Automation program included in the SPP. The Self-Healing Network project cost would be included in the process of determining base rates since these devices would be utilized on existing distribution lines which allow the capability of being interconnected. This interconnection and installation of the devices will be placed at strategic locations on the distribution system then programmed to determine the location of any faults that occur and then isolate the faulted section. As the faulted section is isolated, the devices will then be able to automatically restore certain sections of the line not impacted by the fault. The Distribution Connectivity and Automation program is a different, distinguishable project with a different scope, appropriate for inclusion in the SPP and for recovery through the SPPCRC process. A large percentage of the focus for the Distribution Connectivity and Automation program in the early years of this will be on establishing new feeder ties which account for approximately 75% of the projected Program costs in the plan. After several years and once this feeder connectivity is established, certain devices can be installed to work in a coordinated manner to minimize customer interruptions when fault conditions occur on a distribution line. The installation of main-line intelligent devices is a

INTERROGATORY NO. 11, cont.

subset of the scope of this Proposed program which has as the primary goal of establishing feeder ties within the distribution network.

To be clear, devices included in the rate proceeding are intended to be installed on existing feeder and lateral connections with cost recovered through base rates. Work included in the Distribution Connectivity and Automation program primarily involves the installation of new feeder and lateral connections during the early years of the program with new devices installed after new connections are completed. This cost is intended to be recovered through the SPPCRC.

Respondent: *Mark Cutshaw*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities
Company.

DOCKET NO. 20250017-EI

DATED: FEBRUARY 26, 2025

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the Office of Public Counsels First Set of Interrogatories to Florida Public Utilities Company (Nos. 1 - 14) in Docket No. 20250017-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

P. Mark Cutshaw

(P. Mark Cutshaw), Declarant

Dated: February 26, 2025