

**SOAH DOCKET NO. 473-25-09020  
PUC DOCKET NO. 57463**

<b>APPLICATION OF SOUTHWESTERN</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>PUBLIC SERVICE COMPANY FOR</b>	<b>§</b>	
<b>APPROVAL OF ITS TRANSMISSION</b>	<b>§</b>	<b>OF</b>
<b>AND DISTRIBUTION SYSTEM</b>	<b>§</b>	
<b>RESILIENCY PLAN</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**DIRECT TESTIMONY**

**OF**

**JOHN E. HASELDEN**

**ON BEHALF OF THE**

**OFFICE OF PUBLIC UTILITY COUNSEL**

**FEBRUARY 28, 2025**

**SOAH DOCKET NO. 473-25-09020  
PUC DOCKET NO. 57463**

**DIRECT TESTIMONY OF JOHN E. HASELDEN**

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## LIST OF ACRONYMS

Acronym	Description
ADMS	Advanced Distribution Management System
AI	Artificial Intelligence
BCR	Benefit Cost Ratio
DSAP	Defensible Space Around Poles
EDM	EDM International
GRIP	Grid Resilience and Innovative Partnerships
NESC	National Electrical Safety Code
O&M	Operations and Maintenance
OPGW	Optical Ground Wire
OPUC	Office of Public Utility Counsel
pLTE	Private LTE
RCRR	Resiliency Cost Recovery Rider
RFI	Request for Information
RTU	Remote Terminal Unit
SAIDI	System Average Interruption Duration Index
SRP	System Resiliency Plan

1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

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

3   **A.**     My name is John E. Haselden. My address is 1711 Wellington Ct., Avon, Indiana 46123.  
4            I am a consultant associated with PMG Consulting, LLC.

5   **Q.     ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS**  
6           **PROCEEDING?**

7   **A.**     I am presenting testimony on behalf of the Office of Public Utility Counsel (“OPUC”).

8   **Q.     PLEASE    OUTLINE   YOUR   EDUCATIONAL   AND   PROFESSIONAL**  
9           **BACKGROUND.**

10  **A.**     I am a graduate of Purdue University, where I received a Bachelor of Science in Civil  
11            Engineering. I also hold a Master of Business Administration from Indiana University with  
12            a concentration in Finance. I am a licensed professional engineer in Indiana. Prior to  
13            retiring, I worked for the Indiana Office of the Utility Consumer Counselor for four years  
14            as a Senior Utility Analyst. Before that, I retired from Indianapolis Power & Light  
15            Company after 27 years in various roles. My full professional qualifications are provided  
16            in Attachment JEH-1.

17  **Q.     HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

18  **A.**     Yes. I have previously provided testimony before the Public Utility Commission of Texas  
19            (“Commission” or “PUC”) in Docket Nos. 55157, 56548, 56735, 56954, 57057, and  
20            57259. Please also see Attachment JEH-2.

21  **Q.     TO THE EXTENT YOU DO NOT ADDRESS A SPECIFIC ITEM IN YOUR**  
22           **TESTIMONY, SHOULD IT BE CONSTRUED TO MEAN YOU AGREE WITH**

1           **SOUTHWESTERN PUBLIC SERVICE COMPANY’S PROPOSALS ON THE**  
2           **SPECIFIC ITEM?**

3    **A.**    My silence regarding any topics, issues, or items raised in this proceeding does not indicate  
4           my approval of those topics, issues, or items. Rather, the scope of my testimony is limited  
5           to the specific items addressed herein.

6                                   **II.     PURPOSE AND SCOPE**

7    **Q.     WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY IN THIS**  
8           **PROCEEDING?**

9    **A.**    My testimony will address the appropriateness of certain measures, cost effectiveness,  
10          performance metrics, and cost recovery of measures proposed by Southwestern Public  
11          Service Company (“SPS” or “Company”) in this proceeding.

12   **Q.     WHAT ARE YOUR GENERAL CONCLUSIONS REGARDING THE SYSTEM**  
13          **RESILIENCY PLAN (“PLAN” or “SRP”) PROPOSED BY SPS?**

14   **A.**    The Plan<sup>1</sup> is appropriate for SPS and includes measures that include hardening and  
15          modernizing the distribution system and wildfire mitigation.<sup>2</sup> Based on my review, I am  
16          generally supportive of the Plan, with some exceptions. I have reservations concerning the  
17          annual reporting and the cost recovery mechanism proposed for the operations and  
18          maintenance (“O&M”) components of these measures.

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<sup>1</sup> Application of Southwestern Public Service Company for Approval of its Transmission and Distribution System Resiliency Plan. (“Application”).

<sup>2</sup> *Id.* at BATES 007.

1                                   **III.      DISCUSSION OF PROPOSED MEASURES**

2   **Q.      PLEASE DESCRIBE THE MEASURES INCLUDED IN THE PLAN PROPOSED**  
3       **BY THE COMPANY.**

4   **A.**     SPS proposes five measures:<sup>3</sup>

- 5                   1. Distribution Overhead Hardening;  
6                   2. Distribution System Protection Modernization;  
7                   3. Communication Modernization;  
8                   4. Operational Flexibility; and  
9                   5. Wildfire Mitigation.

10           The filing requests approval of \$538.3 million for improvements implemented in years  
11           2025-2028.<sup>4</sup>

12   **Q.      PLEASE DISCUSS THE DISTRIBUTION OVERHEAD HARDENING MEASURE**  
13       **PROPOSED BY THE COMPANY.**

14   **A.**     SPS is proposing a measure to harden their overhead distribution system. The measure will  
15           rebuild all facilities needed to meet SPS's current standards and will include the following  
16           programs:<sup>5</sup>

- 17                   1. Replacing distribution poles, crossarms, conductor, line transformers, and open  
18                   wire secondary;  
19                   2. Trussing and wrapping poles;

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<sup>3</sup> *Id.* at BATES 003.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at BATES 010.

1           3. Adding new poles to optimize span lengths; and

2           4. Replacing arrestors and transformer fuses with non-expulsion alternatives to  
3           mitigate wildfire ignition risks.<sup>6</sup>

4           SPS upgraded its distribution construction guidelines in 2014 to move from National  
5           Electrical Safety Code (“NESC”) Grade C to Grade B guidelines.<sup>7</sup> SPS currently has three  
6           programs to address the deteriorated state of their distribution system, but this additional  
7           Overhead Hardening measure will provide additional needed improvements. The current  
8           average age of a pole in the SPS system is 38.96 years.<sup>8</sup> However, SPS estimates the  
9           average pole age will not decrease significantly after the completion of the SRP.<sup>9</sup> SPS  
10          acknowledges their equipment was involved in two ignitions of 2024 Smokehouse Creek  
11          Fire and Reamer Fire in the Texas Panhandle.<sup>10</sup> The ignition of the Smokehouse Creek  
12          Fire was determined to have been caused by a decayed pole broken at ground level  
13          followed by contact of the conductors with grassy fuels.<sup>11</sup>

14   **Q.    WHAT IS YOUR OPINION OF THE DISTRIBUTION OVERHEAD HARDENING**  
15   **MEASURE PROPOSED BY SPS?**

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<sup>6</sup> *Id.*

<sup>7</sup> Direct Testimony of Casey S. Meeks at 12:1-3. (“Meeks Direct”).

<sup>8</sup> Application at BATES 243, Figure 5-9.

<sup>9</sup> Southwestern Public Service Company’s Response to Office of Public Utility Counsel’s First Request for Information at 12 (Feb. 6, 2025). (“SPS Response to OPUC’s 1st RFI”).

<sup>10</sup> Direct Testimony of Adrian J. Rodriguez at 10:10-12 (Dec. 30, 2024). (“Rodriguez Direct”).

<sup>11</sup> Application at BATES 052 (citing A Report to the House of Representatives 89<sup>th</sup> Texas Legislature, May 1, 2024 Investigative Committee on the Panhandle Wildfires, Texas House of Representatives at 6 (May 1, 2024), available at <https://www.house.texas.gov/pdfs/committees/reports/interim/88interim/House-Interim-Committee-on-The-Panhandle-Wildfires-Report.pdf>).

1 A. I am generally supportive of the Plan as it relates to the proposed Distribution Overhead  
2 Hardening measure. 1898 & Co. estimates this measure will be cost effective with an  
3 average Benefit Cost Ratio (“BCR”) of 4.7.<sup>12</sup>

4 **Q. PLEASE DISCUSS THE DISTRIBUTION SYSTEM PROTECTION**  
5 **MODERNIZATION MEASURE PROPOSED BY THE COMPANY.**

6 A. SPS is proposing two programs in this measure:<sup>13</sup>

- 7 1. Mainline Automated Recloser Deployment, and
- 8 2. Lateral Reclosing Deployment.

9 These deployments are additional reclosures which will be brought into SPS’s existing  
10 Advanced Distribution Management System (“ADMS”).<sup>14</sup> This measure will further  
11 sectionalize mainline facilities and select lateral lines. Equipment can be programmed to  
12 reset automatically if the system determines a fault has cleared or may be operated remotely  
13 to shut off power during wildfire events.<sup>15</sup>

14 **Q. WHAT IS YOUR OPINION OF THE DISTRIBUTION SYSTEM PROTECTION**  
15 **MODERNIZATION MEASURE PROPOSED BY SPS?**

16 A. I am generally supportive of the Plan as it relates to the proposed Distribution System  
17 Protection Modernization measure. 1898 & Co. estimates this measure will be cost  
18 effective with an average BCR of 4.2<sup>16</sup>

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<sup>12</sup> Direct Testimony of Brianne Jole at 15:17-21. (“Jole Direct”).

<sup>13</sup> Jole Direct at 25:1-16.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.* at 25:5-15.

<sup>16</sup> *Id.* at 31:5-6.



1   **Q.     PLEASE DISCUSS THE COMMUNICATION MODERNIZATION MEASURE**  
2       **PROPOSED BY THE COMPANY.**

3   **A.**    SPS is proposing to invest in the build out of a private wireless (“pLTE”) network, add  
4       new optical ground wire (“OPGW”), and install remote terminal units (“RTUs”) at  
5       substations.<sup>17</sup> Currently, SPS relies on public cellular networks to communicate with field  
6       devices through the ADMS system as well as other systems such as the Advanced Metering  
7       System.<sup>18</sup> Because of sparse population in many parts of the SPS service territory, cellular  
8       services are limited or not available.<sup>19</sup> SPS plans to build 49 new cellular towers and  
9       83 miles of OPGW to permit migration of systems from public cellular networks to their  
10      pLTE.<sup>20</sup> This should fully enable the benefits of the Distribution Protection System  
11      Modernization measure. Moving to a pLTE network should also make operations more  
12      secure against cyberattacks.<sup>21</sup>

13   **Q.     WHAT IS YOUR OPINION OF THE COMMUNICATION MODERNIZATION**  
14       **MEASURES PROPOSED BY SPS?**

15   **A.**    I am generally supportive of the Plan as it relates to the proposed Communication  
16       Modernization measure. Because this measure is an enabling technology needed to make  
17       the Distribution Protection System Modernization measure perform, the costs were  
18       included in the BCR calculations for the mainline reclosers to reach a value of 1.8.<sup>22</sup> SPS

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<sup>17</sup> Direct Testimony of Wendall A. Reimer at 7: 1-5. (“Reimer Direct”).

<sup>18</sup> *Id.* at 7:11-12.

<sup>19</sup> *Id.* at 14:20-24.

<sup>20</sup> *Id.* at 19:3-4.

<sup>21</sup> *Id.* at 12:12-22.

<sup>22</sup> *Id.* at 16:1-13.

1 expects there will be a reduction in O&M costs in switching away from public cellular  
2 networks. However, SPS is non-committal about whether any rents from other parties for  
3 tower space will be netted against the costs to be recovered for this SRP.<sup>23</sup> If approved by  
4 the Commission, I recommend this be a condition of approval.

5 **Q. PLEASE DISCUSS THE OPERATIONAL FLEXIBILITY MEASURE PROPOSED**  
6 **BY THE COMPANY.**

7 **A.** SPS proposes to procure six mobile substations, one mobile circuit switcher, and one  
8 mobile regulator.<sup>24</sup> SPS also proposes to install 17 transmission switches to SPS to  
9 sectionalize facilities and permit fault isolation to keep more customers energized in the  
10 event of a transmission fault.<sup>25</sup> The mobile substation equipment will allow SPS to respond  
11 faster to resiliency events and other emergency outages. SPS currently has 12 mobile  
12 substations.

13 **Q. WHAT IS YOUR OPINION OF THE OPERATIONAL FLEXIBILITY MEASURE**  
14 **PROPOSED BY SPS?**

15 **A.** I am generally supportive of the Plan as it relates to the proposed Operational Flexibility  
16 measure apart from the number of mobile substations. 1898 & Co. did not evaluate this  
17 measure and SPS did not offer any justification for additional mobile substations other than  
18 they would likely shorten substation restoration times in the event of an emergency.<sup>26</sup> I

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<sup>23</sup> Southwestern Public Service Company's Response to Office of Public Utility Counsel's Second Request for Information at 15 (Feb. 10, 2025). ("SPS Response to OPUC's 2<sup>nd</sup> RFI").

<sup>24</sup> Application at BATES 102.

<sup>25</sup> Jole Direct at 39:10-13.

<sup>26</sup> Jole Direct at 40:9-19.

1 recommend the number of mobile substations be reduced to three because SPS already  
2 owns 12 and has another four on order.<sup>27</sup> This measure is proposed to be evaluated on a  
3 ten-year rolling average System Average Interruption Duration Index (“SAIDI”).<sup>28</sup> SPS  
4 should evaluate the effectiveness of the added mobile substations over the next three years  
5 and pursue acquiring additional units in a subsequent SRP or outside this SRP application  
6 if needed.

7 **Q. PLEASE DISCUSS THE WILDFIRE MITIGATION MEASURE PROPOSED BY**  
8 **THE COMPANY.**

9 **A.** SPS proposes two programs: (1) Wildfire Situational Awareness and (2) Wildfire Physical  
10 Mitigation.<sup>29</sup> The Situational Awareness program encompasses four sub-programs:<sup>30</sup>

- 11 1. Wildfire Risk Maps;
- 12 2. Enhanced Meteorological Capabilities
- 13 3. Weather and Fire Science Modeling; and
- 14 4. Artificial Intelligence (“AI”) Cameras.

15 SPS recently contracted with EDM International to produce a Wildfire Risk Map to identify  
16 tiered wildfire risk zones and assign system investment priorities for other system measure  
17 projects.<sup>31</sup> SPS proposes to update the Wildfire Risk Maps in 2027 as part of this SRP.<sup>32</sup>

18 The Enhanced Meteorological Capabilities program consists of 110 pole-mounted weather

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<sup>27</sup> Jole Direct at 40:3-5.

<sup>28</sup> Application at BATES 035, Table 2.

<sup>29</sup> Direct Testimony of Anne Z. Sherwood at 5:4-5. (“Sherwood Direct”).

<sup>30</sup> *Id.* at 9:16-18.

<sup>31</sup> *Id.* at 8:19-22.

<sup>32</sup> *Id.* at 9:15-18.

1 stations.<sup>33</sup> SPS proposes to use the information generated by the weather stations to trigger  
2 early warnings of fire and inform decisions on equipment maintenance, line energization,  
3 and targeted inspections.<sup>34</sup> The Weather and Fire Science modeling project is to be used  
4 for risk modeling and planning purposes. The outputs from the modeling will assist in fuel  
5 mapping, weather modeling, fire behavior, risk assessment, fuel treatment planning, and  
6 other factors to consider in planning for wildfire mitigation.<sup>35</sup> SPS was successful in being  
7 allotted \$7.3 million in Grid Resilience and Innovation Partnerships (“GRIP”) federal  
8 funding for this program. SPS is proposing to install 68 AI cameras for early wildfire  
9 detection.<sup>36</sup> The purpose of the AI feature is to improve accuracy of the cameras in  
10 detecting smoke.

11 **Q. WHAT IS YOUR OPINION OF THE WILDFIRE SITUATIONAL AWARENESS**  
12 **PROGRAMS PROPOSED BY SPS?**

13 **A.** The SPS distribution system is undoubtedly at risk from wildfires. The situational  
14 awareness projects proposed by SPS are helpful in planning the physical mitigation  
15 programs and should result in quicker responses to wildfires. Unfortunately, the weather  
16 stations, AI cameras, and Weather and Fire Science modeling do not interact with each  
17 other in real time.<sup>37</sup> It is not clear how SPS will use data from one program to inform  
18 another. I also have concerns with the lack of effectiveness metrics proposed by SPS for

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<sup>33</sup> *Id.* at 11:2-3.

<sup>34</sup> *Id.* at 10:13-15.

<sup>35</sup> *Id.* at 11:17-21.

<sup>36</sup> Application at BATES 118.

<sup>37</sup> SPS Response to OPUC’s 1st RFI at 7.

1 these situational awareness programs. SPS acknowledges there is no robust data set  
2 available to demonstrate cost effectiveness.<sup>38</sup> However, it is reasonable to expect SPS to  
3 make a thorough annual report on the progress and performance of the programs, detailing  
4 for example: (1) the useful information the weather station actually provided; (2) whether  
5 the AI cameras detected any instances of smoke or wildfires; (3) the ways in which the  
6 Weather and Fire Science modeling aided in the response to wildfires; and (4) whether the  
7 situational awareness programs deliver the many functions and benefits described in  
8 Ms. Sherwood's testimony.

9 **Q. PLEASE DISCUSS THE WILDFIRE PHYSICAL MITIGATION PROGRAM**  
10 **PROPOSED BY THE COMPANY.**

11 **A.** SPS is proposing three programs:<sup>39</sup>

- 12 1. Defensible Space Around Poles ("DSAP");
- 13 2. Wood substation conversions; and
- 14 3. Transmission wildfire detailed inspections.

15 The DSAP activity is a vegetation management program to manage spaces around  
16 transmission and distribution assets by removing fuel, such as brush, limbs, foliage and  
17 grasses. This activity will reduce the chances of ignition from utility facilities during  
18 resiliency events. SPS has identified four substations of wood construction in areas at risk  
19 of wildfires.<sup>40</sup> These substations will be removed, and SPS will implement distribution  
20 feeder level voltage conversions at each site to eliminate the risks of these substations to

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<sup>38</sup> Sherwood Direct at 16:16-19.

<sup>39</sup> *Id.* at 15:3-6.

<sup>40</sup> Application at BATES 119.

1 fire to the supporting structures. The transmission wildfire inspections are visual  
2 inspections conducted annually or biannually on transmission lines and poles. These  
3 inspections will enable SPS to more quickly identify issues and remedy them before a  
4 wildfire ignition might occur and to remedy issues due to resiliency events.

5 **Q. WHAT IS YOUR OPINION OF THE WILDFIRE PHYSICAL MITIGATION**  
6 **PROGRAMS PROPOSED BY SPS?**

7 **A.** I am generally supportive of the Wildfire Physical Mitigation programs proposed by SPS.  
8 However, I have concerns about the metrics proposed for the Wildfire Mitigation Measure  
9 as a whole. SPS proposes to evaluate effectiveness by counting the number of DSAP units  
10 identified and completed compared to the Plan and by counting the detailed transmission  
11 inspections completed as compared to the Plan. These proposed metrics have little  
12 relationship to the effectiveness of the programs in mitigating wildfires, utility ignitions,  
13 or damage to SPS facilities.

14 I recommend SPS submit an annual report as to how the programs performed, detailing for  
15 example: (1) whether the DSAP treatments work in preventing ignitions or protecting  
16 facilities in wildfire or resiliency events; (2) whether the pole wraps protect poles during a  
17 wildfire; (3) issues that were preemptively resolved by the transmission lines and poles  
18 inspections; and (4) how the situational awareness programs enhanced the physical  
19 mitigation programs. In absence of economic justification, SPS should explain what  
20 worked, what did not work, and what will be changed as the Wildfire Mitigation measure  
21 progresses through its implementation.

1   **Q.     WHAT ARE YOUR CONCERNS WITH THE PROPOSED COST RECOVERY OF**  
2   **THE WILDFIRE MITIGATION MEASURES?**

3   **A.**    SPS is proposing to include the O&M costs of the Wildfire Mitigation measure in the  
4           requested regulatory asset for the Plan, which is to be recovered in a future general rate  
5           proceeding.<sup>41</sup> The O&M portion of the proposed measure is projected to cost  
6           \$15.8 million.<sup>42</sup> The O&M activities described for this measure would normally be  
7           expensed as O&M costs. This is not a capital project. In my professional opinion, non-  
8           capital costs such as these should not earn an equity return on the costs incurred. SPS has  
9           the option to recover these costs through a Resiliency Cost Recovery Rider (“RCRR”) in a  
10          timely manner.<sup>43</sup> Should these measures be approved, I recommend that O&M costs for  
11          the Wildfire Mitigation measures be recovered through an RCRR. This method of recovery  
12          will reduce the overall costs for customers and reduce rate shock in a future rate case. In  
13          the alternative, if regulatory asset recovery is authorized for these measures, the calculation  
14          of the carrying costs should be modified to remove the equity return on the O&M costs. If  
15          approved, SPS should recover the prudently incurred costs of these measures but should  
16          not earn a return in future base rates on what would otherwise be considered an O&M  
17          activity.

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<sup>41</sup> Direct Testimony of Brooke A. Trammell at 35:4-15. (“Trammell Direct”).

<sup>42</sup> Application at BATES 122, Table 17.

<sup>43</sup> 16 Tex. Admin. Code § 25.62 (f)(1).

1 Additionally, The Company has been allotted grant funding to help defray the cost of the  
2 Wildfire Mitigation measure.<sup>44</sup> I recommend SPS be prepared to apply for other grant  
3 funding that may become available through the GRIP program and that SPS explore  
4 similar grant funding opportunities should they become available.

5 **Q. DO YOU HAVE CONCERNS ABOUT THE REPORTING PROPOSED BY SPS**  
6 **FOR PROGRESS ON EXECUTING THE PLAN?**

7 **A.** SPS is proposing to only report on an annual basis in a report submitted to the Commission  
8 consistent with the requirements of 16 TAC § 25.62(g).<sup>45</sup> Although it is expected there will  
9 be variances in estimated project costs, detailed explanations of significant cost variances  
10 should also be included in the annual report. Otherwise, examination of significant  
11 variances will possibly be postponed for years until recovery is requested in a rate  
12 proceeding. I recommend detailed explanations of variances of +/- 30% of the estimated  
13 costs of individual projects be included in the annual SRP report. In addition, a discussion  
14 of corrective actions for similar planned projects should also be included in the report.

15 **IV. SUMMARY OF FINDINGS AND RECOMMENDATIONS**

16 **Q. PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS OF THE**  
17 **PROPOSED MEASURES IN THIS PROCEEDING.**

18 **A.** Please see Table 1 below for a summary of my recommendations:  
19

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<sup>44</sup> Sherwood Direct at 12:10-17.

<sup>45</sup> Trammel Direct at 30:10-12.



1

**Table 1: Summary of OPUC Recommendations**

<b>Supported Measure</b>	<b>OPUC Recommendation</b>
Distribution Overhead Hardening	<ul style="list-style-type: none"> <li>• OPUC is generally supportive of this measure.</li> </ul>
Communication Modernization	<ul style="list-style-type: none"> <li>• SPS commits that any rents from other parties for tower space will be netted against the costs to be recovered for this SRP.</li> </ul>
Operational Flexibility	<ul style="list-style-type: none"> <li>• SPS reduces the number of mobile substations to three because SPS currently owns 12 mobile substations and has another four substations on order.</li> <li>• SPS evaluates the effectiveness of the mobile substations over the next three years and pursue acquiring additional units in a subsequent SRP or outside this SRP if they are needed.</li> </ul>
Wildfire Situational Awareness Program	<ul style="list-style-type: none"> <li>• SPS makes a thorough annual report on the progress and performance of the programs and whether such programs delivered the functions and benefits described in Ms. Sherwood's testimony.</li> </ul>
Wildfire Physical Mitigation Program	<ul style="list-style-type: none"> <li>• SPS reports in detail on an annual basis as to how the programs performed.</li> <li>• SPS should explain what worked, what did not work, and what changes will be made as the Wildfire Mitigation measure is implemented.</li> <li>• SPS be prepared to apply for other grant funding that may become available through GRIP and SPS explores other similar grant funding opportunities should they become available.</li> </ul>
Recovery of Wildfire Mitigation	<ul style="list-style-type: none"> <li>• O&amp;M costs for the Wildfire Mitigation measures be recovered through an RCRR.</li> <li>• In the alternative, if regulatory asset recovery is authorized for these measures, the calculation of the carrying costs should be modified to remove the equity return on the O&amp;M costs.</li> </ul>

2

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**4 **A.** Yes, at this time.

# **ATTACHMENTS**

**JOHN E. HASELDEN, P.E.**

Mr. Haselden is a consultant in the utility industry with more than 40 years of public and private experience. He has extensive experience analyzing utility filings, integrated resource plans, renewable energy resources, demand-side management evaluations, and market potential studies. Mr. Haselden is a licensed professional engineer in Indiana.

**PROFESSIONAL EMPLOYMENT**

**UTILITY REGULATORY CONSULTING**

**2022 – Present**

***Consultant***

- Currently represents the Indiana Office of Consumer Counselor in electric matters and the Texas Office of Public Utility Counselor in a variety of matters.

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**

**2018 - 2022**

***Senior Utility Analyst – Engineer***

- Responsible for the review and evaluation of electric utility filings at the Indiana Utility Regulatory Commission. Specific areas include Integrated Resource Plans, environmental compliance, renewable energy, new generating assets, power purchase agreements, demand-side management, electric vehicle charging systems, and transmission, distribution system improvement charge (TDSIC) filings.
- Provided expert witness testimony before the Indiana Utility Regulatory Commission.
- Provided technical support on cases as requested.

**INDIANAPOLIS POWER & LIGHT COMPANY, Indianapolis, IN**

**2006 - 2018**

Investor-owned electric utility with annual revenues in excess of \$1 billion and serves over 480,000 customers with 3,353 MW of capacity.

***Principal Engineer, Regulatory Affairs***

**2006 - 2018**

- Responsible for the evaluation and economic analysis of IPL's Demand Side Management (DSM) programs from 2006 - 2015.
- Assisted with coordinating the evaluation of environmental compliance options and was responsible for coordinating the required studies, written testimony, and regulatory filings for IPL's Mercury Air Toxics Standards compliance plan and the NPDES and NAAQS compliance plans before the Indiana Utility Regulatory Commission (IURC).

- Responsible for issuing Requests for Proposals for renewable energy resources and assisted in negotiation of two long term power purchase agreements for wind energy. Provided expert witness testimony in IPL's filing for approval at the IURC.
- In-house expert on renewable energy technologies and designer of IPL's Rate REP (Renewable Energy Production), a feed-in tariff for renewable energy production.
- Provided expert testimony before the IURC on the topics of renewable energy, demand response, distributed generation, and demand-side management.

**THE INDIANA RAIL ROAD COMPANY, Indianapolis, IN**

**1997 to 2006**

A regional freight railroad operating over 155 miles of track in Indiana and Illinois with annual revenues in excess of \$20 million.

***Director of Industrial Development and Engineering Services***

**2002 to 2006**

- Responsible for planning and implementing long-term capital investments in the railroad's infrastructure with a goal of increasing speed and reliability.
- Responsible for designing and supervising construction of capital projects for the railroad.
- Responsible for real estate activities for the railroad including land purchases, sales, condemnations, easements, and encroachment agreements.
- Responsible for the design and construction of new rail projects such as sidings, build-in projects and new services for customers including a 2.3 mile spur track connection to a rock quarry.

***Director of Marketing***

**1997 - 2002**

Responsible for marketing the railroad's transportation and operating services to electric utilities, a major petroleum refinery and a variety of other customers involving a wide range of goods and commodities. Provides assistance in legal and regulatory proceedings.

- Responsible for negotiating and writing transportation agreements for coal delivered to four major electric utilities. One of which included the construction of a 5-mile "build-out" track from the plant to the railroad.
- Responsible for several current projects in various stages of development involving rail access to new customers including coal mines, stone and gravel quarries and other development projects. These projects include financial and physical feasibility analysis, preliminary design and partnering with customers and government agencies when appropriate.
- Responsible for real estate activities for the railroad including land purchases, sales, condemnations, easements, and encroachment agreements.

**INDIANAPOLIS POWER & LIGHT COMPANY, Indianapolis, IN**

**1982 - 1997**

Investor-owned electric utility, which at that time had annual revenues in excess of \$700 million and served over 410,000 customers with 2,968 MW of capacity.

***Director, Demand-Side Management and Marketing***

**1993 - 1997**

Established the DSM Department and implemented eight new and three existing energy efficiency programs for customers that required the integration of many internal and external resources; programs reduced electric demand by an amount equivalent to the capacity of a 100MW combustion turbine.

- Supervised staff of fifteen professionals, three clerical employees, outside contractors and consultants with an annual budget of \$8 million.
- Accountable for DSM program development, creation of marketing materials, administration of regulatory filings and procurement of a computerized DSM Tracking System that stores customer and program data, generates reports and issues incentive payments.
- Special assignment to negotiate a unique long-term coke oven gas fuel supply agreement between IPL and Citizens Gas & Coke Utility that resulted in millions of dollars of annual savings for both parties. Citizens later purchased the IPL thermal system.
- Conducted a rigorous evaluation of the DSM programs and implemented the phase out of the programs while considering outstanding customer obligations and completing a structured redeployment of staff into the corporate organization.

***Director, Fuel Supply***

**1989 -1993**

Responsible for the negotiation of coal, natural gas, limestone, trucking and railroad contracts, contract administration, railcar procurement and maintenance, inventory management, fuel quality assurance and fuel planning.

- Supervised six professional employees and administered an annual budget of \$150 million.
- Negotiated favorable fuel contracts that led IPL to be consistently rated as one of the five utilities east of the Mississippi River having the lowest fuel costs.
- Served as an expert witness in testimony before the Indiana Utility Regulatory Commission on issues regarding availability and pricing of natural gas and coal as Clean Air Act Amendment compliance fuels.
- Sought out new suppliers of coal to enhance company's competitive posture; negotiated six major long-term coal supply agreements that ensured reliable supply of fuel for at least ten years.

***Senior Engineer, Power Production Planning***

**1987 - 1989**

Responsible for conducting studies concerning future generating resources, economic evaluations, and other studies making extensive use of mainframe and personal computers; performed a complex probabilistic and statistical study of fuel supply inventory optimization.

***Design Project Engineer, Mechanical Engineering Group***

**1982 -1987**

Responsible for a wide variety of projects from budget and estimate preparation through design, bidding, and construction supervision. Specific projects included design of new buildings and roads, cooling tower rebuilding, structural repairs and modifications, ash handling facilities and applications of protective coatings and alloy materials in SO<sub>2</sub> scrubbers.

### **CONSULTING ENGINEERING EXPERIENCE**

- Monical Associates, Inc., Indianapolis, IN **1980 – 1982**  
Project Engineering positions involving design and drawing of plans for highway bridges and roads, sewers, structures, and land surveying.
- Longardner and Associates, Inc., Indianapolis, IN **1978 - 1980**  
Project Engineering positions involving design of highway bridges and roads, sewers, structures, and land surveying.
- ATEC Associates, Inc., Indianapolis, IN **1977 - 1978**  
Extensive field testing and inspection of soil compaction, foundations, concrete, non-destructive testing, soil borings and pile load tests. Promoted to Laboratory Manager performing ASTM tests on soils, concrete, asphalt, aggregate and other materials.

### **EDUCATION**

**Master of Business Administration - Finance, Indiana University**

**Bachelor of Science in Civil Engineering, Geotechnical and Structural Engineering -  
Purdue University**

### **PROFESSIONAL AND BUSINESS AFFILIATIONS**

**Licensed Professional Engineer, Indiana**

**American Society of Civil Engineers, Life Member**

**Optimist Club of Avon, Indiana, President, Past Lt. Governor**

**JOHN E. HASELDEN, P.E.**  
**TESTIMONY FILED - TEXAS**

Dkt No.	Date	Representing	Utility	Type	Issues
57057	Nov, 2024	Office of Public Counsel	AEP Texas	Resiliency Plan	Appropriateness of Plan
56954	Oct, 2024	Office of Public Counsel	Texas New Mexico	Resiliency Plan	Appropriateness of Plan
56735	Aug, 2024	Office of Public Counsel	Entergy Texas	Resiliency Plan	Appropriateness of Plan
55157	July, 2024	Office of Public Counsel	Texas Water Utilities	Merger/Initial Rates	Appropriateness of Rates
56548	June, 2024	Office of Public Counsel	CenterPoint Houston	Resiliency Plan	Appropriateness of Plan

**TESTIMONY FILED - INDIANA**

46069	Aug, 2024	OUCC	Duke Energy Indiana	Alt. Reg. Plan	EV Make-Ready Credit
46090	Aug, 2024	OUCC	Indiana Michigan	Alt. Reg. Plan	EV Transportation Plan
45919	Sept. 2023	OUCC	Indiana Michigan	Alt. Reg. Plan	EV Fast Charge Rate, Owned
45772	Jan. 2023	OUCC	NIPSCO	Rate Case	EV Fast Charge Rate, Owned
45803	Feb. 2023	OUCC	Duke Energy Indiana	DSM Plan	Cost Effectiveness
45508	July 2022	OUCC	Duke Energy Indiana	Rate EDG	Excess Solar Pricing
45576	Oct. 2021	OUCC	Indiana Michigan	Rate Case	EV Infra. Cost Recovery
45485	Apr. 2021	OUCC	Bellflower Wind	Decl of Jurisdiction	None

45465	Feb 2021	OUCC	NIPSCO	Alt. Reg. Plan	Low Inc Program
45387	Aug. 2020	OUCC	Vectren South	DSM Plan	Multiple Issues
45370	July 2020	OUCC	AES Indiana	DSM Plan	Multiple Issues
45285	Jan. 2020	OUCC	Indiana Michigan	DSM Plan	Cost Effectiveness
45245	Aug. 2019	OUCC	Indiana Michigan	Clean Energy Proj.	Solar CPCN
45235	Aug 2019	OUCC	Indiana Michigan	Rate Case	DSM, Ec Dev Rates
45194	April 2019	OUCC	NIPSCO	Clean Energy Proj.	Economics
45145	Jan. 2019	OUCC	Duke Energy Indiana	Alt. Reg. Plan	Solar Leasiing
45086	Sept. 2018	OUCC	Vectren South	Clean Energy Proj.	Solar CPCN
44339	Oct. 2013	IPL	IPL	Gas Conversion	Net Metering
44018	May 2011	IPL	IPL	Clean Energy Proj.	Rate REP
43740	July 2009	IPL	IPL	Clean Energy Proj.	Lakefield Wind
43960	Oct. 2010	IPL	IPL	DSM Plan	Cost Effectiveness
43485	Apr. 2008	IPL	IPL	Clean Energy Proj.	Hoosier Wind