

# Multi-Year Rate Plans – Strategies for Consumer Advocates

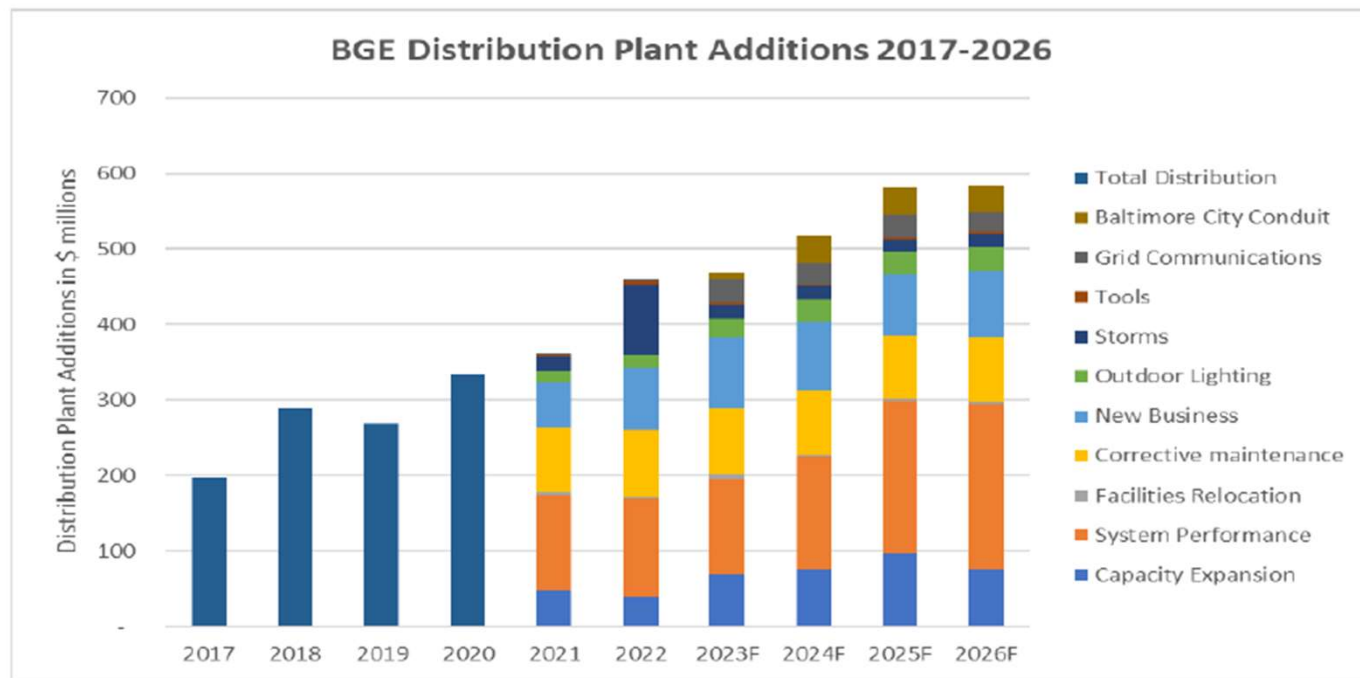
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# Develop a theme – a counter-narrative

*Figure 1 – Electric Plant Additions*



## Develop a theme – a counter-narrative

- Setting State policy in ways that advance utility interests (capital investments)
  - Doubling down on gas infrastructure investments (\$500 million – new investments only)
  - Electrification program – gas backup
  - Gas replacement versus non-pipeline alternatives and repair
- Investing before investment is necessary
  - Replace useful meters with years of service life remaining (\$57.8 million)
  - Unnecessary 4kv to 13kv conversions (\$25 million), planned cable replacement (\$43 million)
- Converting expenses into capital investments (conduit lease; \$17.5 million services contract involving a \$100K F-150)
- Using federal funds to justify unnecessary capital investments (Fiber optic communications \$15 million grant for \$82.5 million program)
- Wishing for more, just in case: capital budget contingency dollars (\$24.3 million)

# Strategies

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## Litigation

- Testimony/briefing should reflect theme
- Consider motions to dismiss
- Prepare in advance—line up experts, discovery, etc.

## Non-litigation

- Public education
- Consumer-friendly documents
- Engage the community, press
- Make rate cases sexy