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July 7, 2023

Ms. A. Shonta Dunston  
Chief Clerk  
N.C. Utilities Commission  
430 N. Salisbury Street, Room 5063  
Raleigh, NC 27603

**Re:   *New River Light and Power Company*  
          *Summary of Rebuttal Testimony of Edmond Miller*  
          *Docket No. E-34, Subs 54 and 55***

Dear Ms. Dunston:

Attached hereto, on behalf of New River Light and Power Company, is the Summary of Rebuttal Testimony of Edmond Miller to be filed in the above-referenced dockets.

Twelve paper copies of same will be delivered to the Clerk's Office within 24 business hours of the electronic filing.

If you have any questions concerning this filing, or exhibits thereto, please do not hesitate to contact me.

Sincerely,

*/s/ David T. Drooz*  
David T. Drooz

pbb

Attachments

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JUL 07 2023



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cc: Parties and Counsel of Record  
NC Commission Staff  
NC Public Staff  
Mr. Randall E. Halley  
Mr. Edmond C. Miller  
Mr. M. Gray Styers, Jr.

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JUL 07 2023

**SUMMARY OF REBUTTAL TESTIMONY OF EDMOND MILLER  
ON BEHALF OF NEW RIVER LIGHT & POWER**

**DOCKET NO. E-34, SUBS 54 & 55  
JULY 10, 2023**

My rebuttal testimony accepts several recommendations from the Public Staff, including:

- New River would file an annual report on Schedule NBR net billing activity in each PPA proceeding for New River.
- Both Schedules NBR and PPR are amended to state that any RECs associated with electricity delivered to the grid by New River customers will be retained by those customers.
- There should be a five-year review of Schedule NBR, and the energy credit for Schedule NBR will be adjusted with each PPA filing based on the rate schedule under which participating customers receive service from New River.
- The PPR rate will be based on total system costs instead of residential class costs.
- There should be a five-year review of Schedule PPR, the PPR will be adjusted with each PPA filing, and the PPR may also be reviewed during biennial avoided cost proceedings.
- Schedule IR is amended to pay a credit only to participants who curtail at the coincident peak.
- Reconnection fees are reduced to \$11.50.
- Rate design is modified to eliminate the proposed two-year phase-in for the Commercial Demand class and to move class rates of return closer to the overall rate of return.

With regard to Appalachian Voices testimony on DSM/EE programs, my rebuttal accepts the idea that New River pursue certain DSM/EE programs; provided that outside funding is available and that third parties can be hired to run the programs. New River simply does not have the financial or staffing resources to develop and operate DSM/EE programs.

Finally, my rebuttal testimony responds to the position of Ms. LaPlaca. In brief, her suggestions for much greater NRLP support of solar energy do not account for the consequences that such changes would create, including cross subsidies by non-solar customers, contrary to North Carolina law, reliability challenges, and large rate increases for all customers if all natural gas-based electricity were to be replaced with renewables.