

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**Electronic Application Of Kentucky Power Company)
For (1) An Order Approving The Terms And)
Conditions Of The Bright Mountain Power Purchase)
Agreement Between The Company And Avangrid)
Renewables, LLC; (2) Authorization To Enter Into)
The Agreement; (3) Recovery Of Costs Through)
Tariff P.P.A.; (4) Approval Of Accounting Practices)
To Establish A Regulatory Asset; And (5) All Other)
Required Approvals And Relief)**

Case No. 2024-00243

DIRECT TESTIMONY

AND EXHIBITS

OF

LEAH J. WELLBORN

ON BEHALF OF

**OFFICE OF THE ATTORNEY GENERAL OF THE COMMONWEALTH OF
KENTUCKY**

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

November 2024

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DIRECT TESTIMONY OF LEAH J. WELLBORN

1 **Q. Please state your name and business address.**

2 A. My name is Leah J. Wellborn. My business address is J. Kennedy and Associates,
3 Inc. ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell,
4 Georgia 30075.

5 **Q. What is your occupation and by whom are you employed?**

6 A. I am a Manager of Consulting at J. Kennedy and Associates, a firm of utility rate,
7 planning, and economic consultants in Roswell, Georgia.

8 **Q. Please describe the nature of the consulting services provided by Kennedy and**
9 **Associates.**

10 A. Kennedy and Associates provides consulting services in the electric and gas utility
11 industries. Our clients include state agencies and industrial electricity consumers. The
12 firm provides expertise in system planning, load forecasting, financial analysis, cost-
13 of-service, and rate design. Current clients include the Georgia and Louisiana Public

1 Service Commissions, the South Carolina Office of Regulatory Staff, the Utah Office
2 of Consumer Services, as well as industrial and commercial customers throughout the
3 United States.

4 **Q. Please state your educational background and experience.**

5 A. I received an undergraduate degree in Mathematics from Georgia Southern University
6 and a Master of Science Degree in Operations Research from the Georgia Institute of
7 Technology, with coursework in energy policy and technology, regression analysis,
8 simulation, optimization, and economic decision analysis.

9 I began my electric utility industry consulting career at Kennedy and
10 Associates in 2013, performing data analysis and testimony support services through
11 December 2018. In 2019, I began work at Accenture, where I supported the global
12 regulated energy team. The team was located within Accenture's procurement
13 practice and provided consulting services to large commercial and industrial clients in
14 the management of their energy costs and energy related initiatives pertaining to
15 regulated utility tariffs, economic dispatch, planning, and market risk. I rejoined
16 Kennedy and Associates in late 2021. I have filed testimony in Georgia, Louisiana,
17 Ohio, and South Carolina, and have worked on projects in other states, including
18 Kentucky and Utah. A summary of my education, experience, and expert testimony
19 appearances is included in Exhibit LJW-1

20 **Q. Have you previously presented testimony before the Kentucky Public Service**
21 **Commission?**

1 A. No.

2 **Q. On whose behalf are you testifying in this proceeding?**

3 A. I am testifying on behalf of the Office of the Attorney General of the Commonwealth
4 of Kentucky (“AG”) and the Kentucky Industrial Utility Customers, Inc. (“KIUC”),
5 a group of large customers of Kentucky Power Company (“KPCO” or “the
6 Company”).

7 **Q. What is the purpose of your testimony?**

8 A. I assess the reasonableness of Company’s application for approval of the Renewable
9 Energy Purchase Agreement for Solar Energy Resources (“REPA”) between Bright
10 Mountain Solar, LLC (“Bright Mountain”) and KPCO for the Bright Mountain Solar
11 Project (the “Project”) located in Perry County, Kentucky. My testimony responds
12 to the testimony of Company Witness Nicole Coon and the economic analysis
13 demonstrating the impacts of the contract to customers.

14 **Q. Would you summarize your conclusions and recommendations?**

15 A. I conclude that the economic analysis under various assumptions indicate the REPA
16 is uneconomic. The Company’s own analysis indicates the project will result in a
17 net cost to customers over each year of the study horizon. The Company’s
18 economic analysis understates the net cost to customers. The economic analysis
19 relies on an overly optimistic forecast of the value of Renewable Energy
20 Certificates (“RECs”) and an overly optimistic forecast of the revenues from selling
21 the REPA energy into the PJM energy markets due to the use of a single,

1 oversimplified energy value methodology. The economic analysis also
2 demonstrates that the REPA does not provide a meaningful amount of capacity to
3 the system.

4 I present an expanded sensitivity view of the Company's economic analysis,
5 considering alternative REC and energy value assumptions, and I conclude that in
6 10 of 12 cases, the REPA remains uneconomic. Because the contract will result in
7 net harm to customers under the Company's own analysis and a majority of the
8 sensitivity cases, I recommend the Commission reject the Company's request for
9 approval of the REPA.

10 **Q. Based on your review of the Company's economic analysis, does the REPA**
11 **provide benefits to the KPCO system?**

12 A. No. The Company's own analysis shows a cost premium associated with REPA in
13 each year of the contract as well as on a net present value ("NPV") of the contract
14 over the study horizon. The following table provides a year over year summary of the
15 costs and benefits modeled by KPCO consistent with the analysis presented by
16 Witness Coon, although I note that Witness Coon did not provide the NPV of the costs
17 incurred pursuant to the REPA and only presented the NPV offsets to those costs as
18 "the benefits" of the REPA.

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Table 1: Annual KPCO Economic Analysis (Nominal)¹

	REPA Contract Cost	Generation Capacity Value	Energy Value	REC Revenue	Net (Cost) / Benefit
2027	\$(12,552,635)	\$319,325	\$ 4,585,379		
2028	\$(12,301,583)	\$283,965	\$ 4,627,138		
2029	\$(12,240,075)	\$289,239	\$ 4,690,011	\$ 5,035,249	\$ (2,225,575)
2030	\$(12,178,874)	\$235,562	\$ 4,843,915	\$ 4,768,342	\$ (2,331,055)
2031	\$(12,117,980)	\$239,812	\$ 4,883,814	\$ 4,785,474	\$ (2,208,880)
2032	\$(12,057,390)	\$244,097	\$ 4,947,617	\$ 4,801,076	\$ (2,064,600)
2033	\$(11,997,103)	\$248,505	\$ 5,105,334	\$ 4,802,354	\$ (1,840,910)
2034	\$(11,937,117)	\$189,820	\$ 5,179,244	\$ 4,803,499	\$ (1,764,555)
2035	\$(11,877,432)	\$193,439	\$ 5,271,780	\$ 4,811,090	\$ (1,601,123)
2036	\$(11,818,045)	\$197,204	\$ 5,339,026	\$ 4,827,267	\$ (1,454,548)
2037	\$(11,758,955)	\$201,102	\$ 5,439,553	\$ 4,829,183	\$ (1,289,118)
2038	\$(11,700,160)	\$205,139	\$ 5,509,173	\$ 4,837,913	\$ (1,147,935)
2039	\$(11,641,659)	\$209,316	\$ 5,467,268	\$ 4,846,435	\$ (1,118,640)
2040	\$(11,583,451)	\$213,606	\$ 5,686,280	\$ 4,854,751	\$ (828,813)
2041	\$(11,525,533)	\$217,935	\$ 5,871,660	\$ 4,861,150	\$ (574,787)
Total	(\$179,287,991)	\$3,488,066	\$77,447,191	\$74,415,119	(\$23,937,615)
Total NPV	\$(101,805,846)	\$2,056,612	\$ 42,570,492	\$42,574,748	\$(14,603,993)

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Q. Does the Company’s analysis reflect a range of possible market futures and the related risks and uncertainty of the forecast benefits reflected in the economic analysis?

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A. No. The Company presents a single case related to the market benefits of the contract. Sensitivity analysis is regularly performed in economic analysis to provide a range of results and assessment of risks associated with a particular resource decision when uncertainty is present. The costs of the REPA are fixed (\$83.68/MWh), but the value

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¹ Company Response to KPSC 1-7, Confidential Attachment 1.

1 of the REPA is subject to assumptions made for the capacity value, energy value, and
2 renewable energy certificate monetization.

3 **Q. Have you assessed the Company's forecast for capacity value?**

4 A. Yes. I reviewed the capacity value assumed in the economic analysis, and Witness
5 Kollen assessed the capacity value in light of the Company's expected capacity need.
6 The Company is assuming a decreasing accreditation based on the Effective Load
7 Carrying Capability ("ELCC") of solar resources in PJM, starting at approximately
8 6.8% in 2027 and decreasing to 3% starting in 2034.²

9 This decreasing ELCC accreditation is balanced by an increasing capacity
10 price of \$160/MW-day in growing to \$249/MW-day in 2041. An increase in market
11 price is reasonable, and is demonstrated by the 2025/2026 Base Residual Auction
12 ("BRA") results published showing pricing at \$270/MW-day.³

13 Similarly, because a solar resource's capacity value depends on its ELCC, as
14 more solar is added to the system, there is additional risk for a decreasing ELCC value
15 and solar accreditation. These two risks (higher market price, lower capacity
16 accreditation) offer a balancing effect on the future risks. Further, given the relative
17 size of the capacity value in the overall cost-benefit analysis, the impact of these
18 assumptions are relatively small.

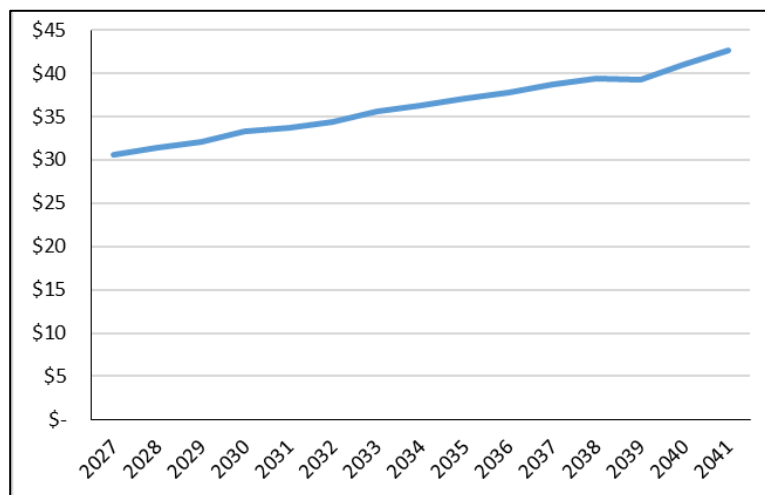
19 **Q. Have you assessed the Company's forecast for energy value?**

² See Company Response to KPSC 1-2 and KPSC 1-3 for basis of ELCC ratings.

³ <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.ashx> Table 1

1 A. Yes. The Company’s forecasted energy price ranges from approximately \$30 to
2 \$43/MWh and is based on the on-peak PJM-AEP values from AEP’s 2023
3 Fundamental Forecast.⁴ This on-peak forecast is reflective of “normal peak hours: 5
4 days x 16 hours” rather than the weighted value of the solar production shape over the
5 hourly solar shape over 7 days. The Company’s use of the 5 x 16 on-peak forecast is
6 an over-simplification and does not represent the true impact of the hourly solar profile
7 and hourly locational marginal prices (“LMPs”) for operations that would spread over
8 on-peak and off-peak hours (weekends). The Company’s methodology likely
9 overstates the value of the energy sales in the PJM markets. The market LMP forecast
10 used in the study is shown in Figure 1 below.

11 **Figure 1: Company Energy Value \$/MWh**⁵



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⁴ See Company Response to KPSC 1-7(a).

⁵ Company Response to KPSC 1-7, Attachment 1.

1 The single AEP on-peak 5x16 forecast is not adequate for assessing the value
2 of the REPA when a significant portion of the value is as a seven days per week energy
3 hedge, which could result in the contract price being more or less than market.⁶ In the
4 case where significant amounts of solar are added to PJM or the forecast was based
5 on the hourly weighting across on-peak and off-peak hours, energy value and LMPs
6 could drop in solar hours. Conversely, as additional load growth materializes in PJM,
7 energy needs may increase the price and valuation of solar. Presenting an economic
8 analysis over a range of market price forecasts would provide the Commission a more
9 complete view of the economics of the project under plausible future conditions.

10 **Q. Have you assessed the Company’s forecast for REC value?**

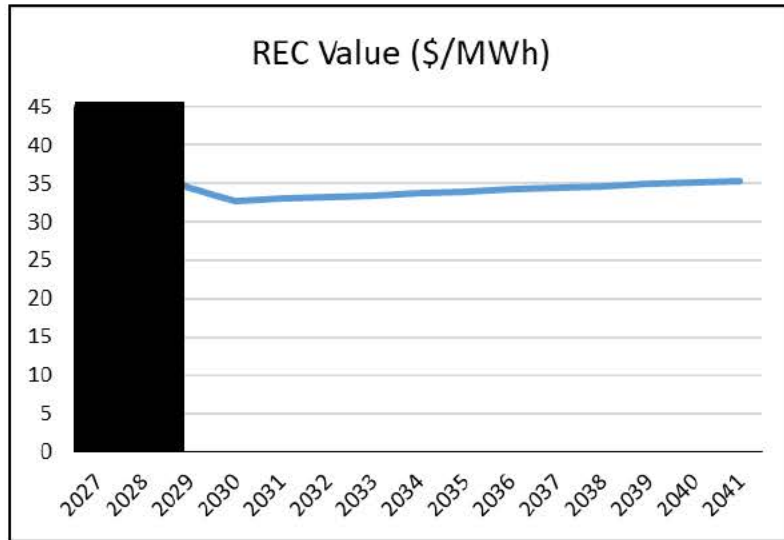
11 A. Yes. The Company’s current expectation to monetize the RECs is to use “either
12 the over-the-counter market via brokers, direct transactions with counterparties, or
13 the Intercontinental Exchange.”⁷ The following chart shows the REC value on a
14 \$/MWh basis assumed for each contract year.

⁶ Coon Direct Testimony at 5. See also Company response to AG/KIUC 1-3(c).

⁷ Company response to AG/KIUC 2-6(b).

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Figure 2: Company REC Forecast in Economic Analysis ⁸



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The forecasted monetized value of the RECs in the Company's economic analyses is highly speculative and based on broker quotes that rely on third-party facilitation of REC transactions between parties. For years 2026-2028, the Company utilized Evolution Markets broker quotes for known, settled prices for PJM TRI Class I RECs in setting the forecasted REC price.⁹ For the remaining contract period, the Company computed a price forecast based on PJM Renewable Portfolio Standard requirements as a function of the Evolution Brokers quotes.¹⁰

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The REC pricing in [REDACTED] than the remaining forecast and indicate there may be significant long-term risk. The actual REC pricing could follow a pattern of declining future value, similar to that which occurred with the value of

⁸ Company Response to KPSC 1-7, Attachment 1.

⁹ Company response to KPSC 1-9

¹⁰ *Id.*

1 NOx and SO₂ allowances over time.¹¹ It may be fair to consider the REC value above
2 zero, but sensitivity analysis that considers a range of REC valuations is appropriate.
3 If the Company cannot monetize the RECs at all, or chooses to retire the RECs instead
4 of monetizing to achieve its own renewable energy goals, a zero value case is a
5 possible outcome to evaluate in sensitivity analysis.

6 **Q. Is the forecasted REC value consistent with the Company's position that it may**
7 **use REC's "to fulfill the Company's obligations, if any, under Rider R.P.O.**
8 **(Renewable Power Option Rider)."**¹²

9 A. No. Under R.P.O Option A, the revenue associated with RECs retired on behalf of
10 end use customers is currently only \$5/MWh. The Company indicates Rider R.P.O.
11 Option B allows for KPCO to negotiate agreements with larger customers to
12 include environment attributes (e.g. RECs); however, it does not provide any
13 methodology to value those RECs and it does not offer any minimum value or
14 guarantee an outcome that ensures the RECs are monetized at the forecast values
15 reflected in the Company's economic analysis.¹³

16 **Q. Are you concerned about the risks of REC monetization?**

17 A. Yes. The risk of monetizing the value of the RECs will be imposed on the
18 Company's customers. The Company's customers will be obligated to pay for the

¹¹ <https://www.eia.gov/todayinenergy/detail.php?id=4830>

¹² Coon Direct Testimony at 4.

¹³ Company data response to AG/KIUC 2-10 part g.

1 REPA through Tariff P.P.A.¹⁴ That cost is known and measurable based on the
2 contract pricing and the performance of the solar resource. The value of the RECs,
3 to the extent they are sold, will be credited to customers through Tariff P.P.A.¹⁵
4 However, the value of the RECs is uncertain. The risk that the actual values will
5 be less than the values forecast by the Company will be imposed on customers
6 through lower credits in Tariff P.P.A., thus resulting in a net cost to customers
7 potentially even greater than the net cost reflected in the Company's economic
8 analysis in this proceeding.

9 The Company could have contracted for the capacity and energy alone,
10 allowing the developer to retain and monetize the REC value,¹⁶ in exchange for
11 lower pricing. It did not. Instead, the REPA includes the renewable attributes, and
12 as such shifts the risk of REC monetization to the Company, and, ultimately, to the
13 Company's customers. The Company could also seek a long-term off-taker for the
14 RECs in a separate agreement, but has not identified a counterparty for such an
15 agreement.¹⁷

16 **Q. Have you conducted an economic analysis to assess the effects of your concerns**
17 **using possible sensitivity assumptions for energy value and REC monetization?**

18 A. Yes. I developed a series of sensitivity analyses of the REPA on a net present value
19 basis. This evaluation considers the total impact of REPA costs and the forecasted

¹⁴ Wolfram Direct Testimony at 15.

¹⁵ Coon Direct Testimony at 6.

¹⁶ Company data response to AG/KIUC 2-8(b).

¹⁷ Company data response to AG/KIUC 2-6(f).

1 capacity, energy, and REC monetization benefits. The analysis includes multiple
2 scenarios of energy and REC monetization variables, based on the risks identified
3 above. The analysis considers 4 distinct REC value cases:

- 4 • **Zero REC value:** this is the most conservative case and assumes no REC
5 counterparty is identified and no RECs are monetized.
- 6 • **\$5/MWh REC value:** this case assigns a moderate \$5/MWh REC value based on
7 the current Tariff R.P.O. Option A pricing.
- 8 • **Company REC value:** this case takes the Company’s assumed REC forecast as
9 provided. (Approximately \$ [REDACTED]/MWh on a levelized basis)
- 10 • **High Sensitivity REC value:** this case takes a higher sensitivity view based on
11 the Company’s workpaper derivation of the REC Ceiling Price based on the
12 alternative compliance payments (“ACPs”) option in Virginia. (Approximately
13 [REDACTED]/MWh on a levelized basis)

14 My analysis also considers a 20% sensitivity on the energy value for
15 illustrative purposes, 80% of the Company forecast is used to derive the energy value
16 in the low sensitivity and a 120% of the Company forecast is used in the high case. I
17 also hold the capacity value and REPA costs constant across all the cases.

18 The following table provides a matrix of costs and benefits under the varying
19 energy value and REC value assumptions. The REC values vary left to right range at
20 the top of the table, and the energy values vary top to bottom as shown on the left of
21 the table.

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Table 2: Sensitivity Analysis – (Cost) / Benefit NPV Smillions

		REC Value			
		Zero (\$0/MWh)	R.P.O (\$5/MWh)	Company Forecast	High REC Sensitivity
Energy Value	Low Sensitivity	(66)	(60)	(23)	(4)
	Company Forecast	(57)	(51)	(15)	4
	High Sensitivity	(49)	(43)	(6)	13

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The economics are significantly challenged in conservative estimate cases assuming little to no REC value and a moderate change in energy value (negative values). Only under the highest REC sensitivity and the expected (Company energy value assumption) and high energy value cases does the REPA appear economic (positive values). I conclude that the REPA is uneconomic in 10 of the 12 sensitivity cases, which include the Company’s case resulting in a net cost of approximately \$15 million (NPV).

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Q. Does that complete your testimony?

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A. Yes.

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Case No. 2024-00243

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OF
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ON BEHALF OF

**OFFICE OF THE ATTORNEY GENERAL OF THE COMMONWEALTH OF
KENTUCKY**

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

November 2024

RESUME OF LEAH JUSTIN WELLBORN, MANAGER OF CONSULTING

EDUCATION

M.S. Operations Research, Georgia Institute of Technology, 2017

B.S. Mathematics, Georgia Southern University, 2012

PROFESSIONAL AFFILIATIONS

Women's Energy Network, Greater Atlanta Chapter – Board Member (2019 – 2023)

Women's Energy Network, Greater Atlanta Chapter – Member (2016 – Present)

EXPERIENCE

Ms. Wellborn has been working in regulated energy markets since early 2013. She has an undergraduate degree in mathematics and graduate degree in operations research. She started her career working at J. Kennedy and Associates, Inc., and sub-contracting to Hayet Power Systems Consulting. For these companies, she provided critical support in the areas of production cost modeling and data analysis through 2018. Ms. Wellborn then spent nearly 3 years at Accenture, supporting its global regulated energy team within the procurement practice, helping large commercial and industrial clients manage their energy spend and energy related initiatives, as they related to regulated utility tariffs, economic dispatch, planning, and market risk (energy efficiency, green tariffs, PPA/VPPA, etc.). Ms. Wellborn rejoined J. Kennedy and Associates in late 2021, and currently provides analytical support to clients in the areas of utility resource planning and market modeling.

2021 to Present: **J. Kennedy and Associates, Inc.**
Manager, Consulting

Performs analysis and prepares expert witness testimony on utility planning studies and economic evaluations in review of electric utility regulatory filings. Clients included State Public Service Commissions, Industrial Users Groups, and Consumer Advocacy Groups.

2019 to 2021: **Accenture, LLP**
Associate Manager, Global Lead - Regulated Energy Procurement

As a part of Accenture Operations' Energy Management and Procurement practice, the Regulated Energy team helps clients identify opportunities for electricity and natural gas cost savings through data analysis and deep industry experience. Clients include large industrial and commercial end-use customers with locations spread across multiple geographies and utility service territories.

- Conducts tariff optimization analysis and ad hoc economic decision analysis for

RESUME OF LEAH JUSTIN WELLBORN, MANAGER OF CONSULTING

clients with operations and energy spend in areas served by regulated electricity and natural gas distribution utilities.

- Leads cross functional international delivery team of 10, providing career counseling and project oversight. Supports international energy procurement functions as they relate to regulated utilities/energy markets of Australia, Southeast Asia, and Latin America.
- Manages project assessments and economic studies as they relate to resource planning or capacity/energy market risk and dispatch pricing (renewables, time-of-use tariffs, real-time-pricing/avoided cost, PPA, VPPA, etc.)
- Collaborates with all energy management work streams - including utility bill management, renewable energy procurement, deregulated markets competitive sourcing, market intelligence, and project management/technology development initiatives to manage customer spend end to end.

**2013 to
2019:** **J. Kennedy and Associates, Inc.**
Senior Consultant

Responsible for conducting research, performing data analysis, developing production-cost model input assumptions and running production-cost studies, analyzing model output, and conducting related economic studies.

CERTIFICATIONS

Energy Exemplar – Aurora Core Certification Course (March 2022)

Energy Exemplar – PLEXOS Power Core Certification Course (June 2023)

CLIENTS SERVED

Georgia Public Service Commission Staff
Louisiana Public Service Commission Staff
Kentucky Industrial Utility Customers, Inc.
Ohio Energy Group
South Carolina Office of Regulatory Staff
Utah Office of Consumer Services
Wisconsin Industrial Energy Group

RESUME OF LEAH JUSTIN WELLBORN, MANAGER OF CONSULTING

TESTIMONY AND EXPERT WITNESS APPEARANCES

Date	Case	Jurisdiction	Party	Utility	Subject
06/18	29849	GA	Georgia Public Service Commission Staff	Georgia Power	Eighteenth Semi-Annual Vogtle Construction Monitoring Report
11/18	29849	GA	Georgia Public Service Commission Staff	Georgia Power	Nineteenth Semi-Annual Vogtle Construction Monitoring Report
5/22	44160	GA	Georgia Public Service Commission Staff	Georgia Power	2022 Integrated Resource Plan (Supply Side Resource Plan, Aurora)
10/22	44280	GA	Georgia Public Service Commission Staff	Georgia Power	2022 Rate Case (Revenue Forecast)
8/23	2023-9-E	SC	South Carolina Office of Regulatory Staff	Dominion Energy South Carolina, Inc.	2023 Integrated Resource Plan
12/23	2023-154-E	SC	South Carolina Office of Regulatory Staff	South Carolina Public Service Authority (Santee Cooper)	2023 Integrated Resource Plan
12/23	U-36974	LA	Louisiana Public Service Commission Staff	1803 Electric Cooperative, Inc.	Certification of a Capacity Purchase Agreement
2/24	55378	GA	Georgia Public Service Commission Staff	Georgia Power	2023 Integrated Resource Plan Update (Supply Side Resource Plan, Aurora)
7/24	2023-8-E	SC	South Carolina Office of Regulatory Staff	Duke Energy Progress, LLC	2023 Integrated Resource Plan
7/24	2023-10-E	SC	South Carolina Office of Regulatory Staff	Duke Energy Carolinas, LLC	2023 Integrated Resource Plan
8/24	24-0508-EL-ATA	OH	Ohio Energy Group	Ohio Power Company	Application of Ohio Power Company for New Tariffs Related to Data Centers and Mobile Data Centers

J. KENNEDY AND ASSOCIATES, INC.

RESUME OF LEAH JUSTIN WELLBORN, MANAGER OF CONSULTING

REPORTS AND INDUSTRY PUBLICATIONS

Date	Title	Author(s)
8/23	Review of EPA's Section 111 May 23, 2023 Proposed Rule for the State of South Carolina	J. Kennedy and Associates, Inc. (On behalf of the South Carolina Office of Regulatory Staff)
7/24	Review of Dominion Energy South Carolina, Inc.'s 2024 Integrated Resource Plan Update Docket No. 2024-9-E	South Carolina Office of Regulatory Staff and J. Kennedy and Associates, Inc.

AFFIDAVIT

STATE OF GEORGIA)

COUNTY OF FULTON)

LEAH J. WELLBORN, being duly sworn, deposes and states: that the attached is her sworn testimony and that the statements contained are true and correct to the best of her knowledge, information and belief.



Leah J. Wellborn

Sworn to and subscribed before me on this
6th day of November 2024.



Notary Public

Jessica K Inman
NOTARY PUBLIC
Cherokee County, GEORGIA
My Commission Expires 07/31/2027