**BEFORE THE**

 **PUBLIC SERVICE COMMISSION**

 **OF THE**

 **STATE OF GEORGIA**

 **PRE-FILED DIRECT TESTIMONY**

 **OF INTERVENOR,**

 **NESTLE PURINA PETCARE COMPANY**

 **PSC DOCKET NO. 42509**

 **GEORGIA POWER COMPANY, PETITIONER**

 **v.**

 **WALTON ELECTRIC MEMBERSHIP CORPORATION, RESPONDENT**

**and**

**NESTLE PURINA PETCARE COMPANY, INTERVENOR**

 **PRE-FILED DIRECT TESTIMONY FROM RYAN MONTGOMERY ON BEHALF OF INTERVENOR NESTLE PURINA PETCARE COMPANY**

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| **BEFORE THE PUBLIC SERVICE COMMISSION****STATE OF GEORGIA** |
| **GEORGIA POWER COMPANY,** **Petitioner*,*****v.****THE WALTON ELECTRIC MEMBERSHIP CORPORATION,**  **Respondent,** **NESTLE PURINA PETCARE COMPANY,** **Intervenor.** | **DOCKET NO. 42509** |

**PRE-FILED DIRECT TESTIMONY FROM RYAN MONTGOMERY ON BEHALF OF INTERVENOR NESTLE PURINA PETCARE COMPANY**

PLEASE STATE YOUR NAME

A. My name is Ryan Montgomery.

Q. WHO IS YOUR EMPLOYER?

A. I am employed by Nestle Purina Petcare Company and work in St. Louis.

Q. WHAT IS YOUR POSITION WITH NESTLE PURINA PETCARE COMPANY?

A. I am the Electrical and Control Engineering Manager for Nestle Purina North America and have been since April of 2018.

Q. AND WHAT ARE YOUR CURRENT RESPONSIBILITIES?

A. I am essentially the electrical engineer overseeing all capital projects Nestle Purina is undertaking in North America. I have a team of fifteen (plus two open positions), five to seven of which are currently working on the Hartwell Project supervising the design and construction of the electrical systems as well as working with our subcontractors and suppliers responsible for that work and with Walton EMC. Those companies include Action Electric, Amcon, PEC (Process Equipment and Controls), IES Commercial. I have a similar responsibility for electrical design and construction work at other Nestle Purina capital projects throughout North America.

Q. CAN YOU EXPLAIN YOUR DAY TO DAY RESPONSIBILITIES?

A. I manage a team of engineers and programmers who execute the electrical and controls design and implementation of capital projects in our North American pet food factories. On a daily basis, I meet with members of my team to ensure project deliverables and schedule are being met. I assign resources to new and existing project as required and I provide direction on technical design questions when they are escalated to me.

Q. HOW LONG HAVE YOU BEEN WITH NESTLE PURINA

A. Since September 22, 2008. I started as a Controls Engineer II, and have served as a Senior Controls Engineer I, Senior Controls Engineer II, Senior Controls Engineer III, Principal Controls Engineer I (Electrical and Controls Design Manager), and Principal Controls Engineer II (Electrical and Controls Engineering Manager). I have worked in St. Louis for the past ten years and eleven months.

Q. HAVE YOU WORKED ANYWHERE ELSE BESIDES NESTLE PURINA?

A. Yes, after college I worked at Enviro-Chem (a Monsanto Company), Dial Corporation (a Henkel Company), and Anheuser-Busch (a Anheuser-Busch InBev company).

Q. PLEASE GIVE US THE BENEFIT OF YOUR EDUCATIONAL BACKGROUND?

A. I graduated from the University of Missouri-Rolla (2002) with a BS in Electrical Engineering (EE) and the Webster University (2013) with a Masters of Business Administration (MBA).

Q. WHEN DID YOU FIRST VISIT THE HARTWELL PROPERTY?

A. I first visited the Hartwell Property in November of 2018, and regularly visit it as part of my responsibilities for the electrical systems in the new factory.

Q. PLEASE DESCRIBE THE PREMISES WHEN YOU FIRST CAME ON SITE?

A. The buildings and infrastructure of the old premises had been neglected for many years. We recognized early on that the majority of the existing electrical systems were dilapidated and would likely require replacement. We felt that some of the existing power panels could be used to supply temporary power during our construction phase of the project. The existing power systems were unsuitable for supporting our pet food processing and packaging, including our completely new utility systems and our new freezer building. We have had to rip out the vast majority of the electrical systems except for some portions of the system in and near the distribution center. There were existing transformers on the east side of the Hartwell property that serviced the original manufacturing facility, but they were inadequate for supplying what our connected electric load will be once we startup, with a connected peak load of 8.5 MW (2 lines) and 11.2MW (3 lines) by mid to late 2020 at initial full operation.

Q. WHY DID THE VAST MAJORITY OF THE ELECTRICAL SYSTEMS HAVE TO BE REPLACED?

A. Several of the switchboards were rusted out; others were no longer serviceable by the manufacturer or unsafe to use and several lighting/power panels were full of lent from the previous manufacturing process and, therefore, unusable.

Q. FROM AN ELECTRIC SYSTEMS STANDPOINT, WHAT HAS NESTLE PURINA DONE WITH THE HARTWELL PROPERTY?

A. After removing all but one of the transformers on the east side of the old premises, we have installed five new substations and related transformers, which will be fed from the new 115 kV substation built by Walton EMC. We have installed all new electrical MCCs (200+ sections), power panels (20+), automation control panels (75+), and thousands of feet of wire basket and wire throughout the new process and packaging area of the Hartwell Factory. We need enough electric capacity to immediately support two production lines and three production lines by mid to late 2020 at initial full operation, which will have an actual load of 10 to 12 MW. Additionally, our current master plan shows us eventually having eight production lines at the Hartwell facility. Lines 3 and 4 are being constructed and installed in a new building and any lines beyond that will be placed in additional new buildings. The electrical systems look completely different and function much differently from when I arrived. Our new design includes redundant power feeds throughout the power system in case of an issue with one of the main power feeders from the 115kV substation, or between our 15kV substation and the other four substations.

Q. I AM HANDING YOU WHAT IS BEING MARKED AS EXHIBIT MONTGOMERY-1. DO YOU RECOGNIZE THIS EMAIL AND ATTACHMENT?

A. Yes.

Q. WHAT ARE THEY?

A. This is an email from me to one of my team members discussing the load for the new Hartwell Factory. And the attachment is a more detailed calculation of the load estimates for the Hartwell Factory over time as it increases production capacity. I reviewed and approved these calculations as part of my on the Hartwell Factory project.

Q. What will the initial connected load be for the new Hartwell Factory?

A. The initial connected load once we startup, will be connected peak load of 8.5 MW at two production lines, Distribution Center, Waste Water, Varity Pack, HVAC, Boilers, and Compressors by November 2019.

Q. WHAT EXISTING ELECTRICAL INFRASTRUCTURE ARE YOU USING IN THE DISTRIBUTION CENTER?

A. We are currently using a Georgia Power owned 1500KVA transformer located on the east side of the Hartwell property, which feeds the original Switch Gear (SG1) located in electrical room 1. SG1 then feeds the original MCC and power panels located on the east wall of the warehouse. It has been our intent from the beginning to power our entire factory from our newly constructed 15kV substation so the use of the Georgia Power transformer is temporary for construction purposes and will not continue. We have a preliminary design and are currently in the process of purchasing a new transformer for electrical room 1 to feed SG1 from our 15kV substation. Underground conduits were installed for SG1 during the initial installation of the 15kV substation in the fall of 2018.

Q. WHO IS CURRENTLY PROVIDING ELECTRIC SERVICE TO THE HARTWELL PROPERTY?

A. Georgia Power Company is providing temporary service during the construction of the factory, and then we plan for Walton EMC to provide permanent service.

Q. HAVE YOU HAD ANY PROBLEMS WITH THE RELIABILITY OF THE ELECTRIC SERVICE BEING PROVIDED DURING CONSTRUCTION OF THE NEW FACTORY?

A. Yes, the power in the field has tripped several times during our initial testing and construction when the capacity of the existing power panel breakers have been exceeded.

Q. HOW DIFFERENT WILL THE NESTLE PURINA FACTORY ELECTRICAL SYSTEMS BE FROM WHAT YOU OBSERVED OF THE OLD PREMISES UPON ARRIVAL IN November of 2018?

A. Completely different. At that time, we were still using any original electrical equipment that was deemed safe for the purpose of temporary construction power. We have since installed a completely new electrical system with a much more robust and reliable infrastructure, multiple substations, MCCs, and power panels. The new electrical system will easily support our first three production lines and has the ability to be expanded to support a connected load of up to 25 MW as the Hartwell Factory potential grows to eight production lines.

**INTERVENOR NESTLE PURINA RESERVES THE RIGHT TO SUBMIT ADDITIONAL EXHIBITS IN ACCORDANCE WITH THE AGREED UPON AUGUST 23, 2019 DATE TO EXCHANGE EXHIBITS SET FORTH IN THE SCHEDULING ORDER**