BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

CITY OF CARTERSVILLE	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 55973
	)	
GEORGIA POWER COMPANY	)	
	)	
Respondent.	)	

PREFILED REBUTTAL TESTIMONY OF ROBERT BENJAMIN ("BEN") BOUCHER, P.E. FILED ON BEHALF OF PETITIONER THE CITY OF CARTERSVILLE, GEORGIA

Q: Please state your name and business address.

A: My name is Robert Benjamin ("Ben") Boucher and my business address is 1470 Riveredge Pkwy, Atlanta, Georgia 30328.

Q: Mr. Boucher, by whom are you employed and what is your job position?

A: I am currently employed by the Electric Cities of Georgia ("ECG"), and I am the Senior Director of Engineering and Energy Services at ECG.

Q: What is ECG?

A: ECG is a non-profit organization that provides strategic and technical services to fifty-two communities that provide electric power in Georgia.

Q: And what are your responsibilities as Senior Director of Engineering and Energy Services at ECG?

A: I am responsible for the Engineering and Pole Attachment Services at ECG. I manage the activities of several engineers and other support staff. Our team supports engineering, pole attachment activities, customer choice methods of service, and territorial decisions for our fifty-two member cities, including the City of Cartersville.

Q: Please describe your educational background and employment history?

A: I graduated with a Bachelor's degree in Civil and Environmental Engineering from the University of Michigan in 2004. I spent 3 years performing engineering design as a consultant for state and local municipalities and electric utilities. In 2007 I began working at the Municipal Electric Authority of Georgia ("MEAG Power"). I spent 17 years at MEAG Power working in several areas including transmission line and substation design and construction, land acquisition and transmission planning. I obtained my Professional Engineering license in the state of Georgia in January 2011. Some key functions included performing method of service studies for customer choice projects, overseeing land acquisition activities, managing the Engineering and Construction department and the Transmission Planning department. I joined ECG in August of 2024 as the Senior Director of Engineering and Energy Services.

Q: What is the purpose of your rebuttal testimony?

A: I reviewed the prefiled direct testimony from Glenn W. Dyke and Mark W. Lees on behalf of Respondent, Georgia Power Company, and I am providing testimony to

rebut what appears to be their contention that the Atkore facility located at 1181 Cassville White Road, Cartersville, Georgia does not have (i) "single-metered service" or (ii) "a connected load which, at the time of initial full operation of the premises, is 900 kilowatts or greater (excluding redundant equipment)" as those terms are used in Georgia Territorial Electric Service Act, O.C.G.A. §§ 46-3-1 through 46-3-15 (hereinafter the "Territorial Act").

Q: Did you review anything else for purposes of your testimony?

A: Yes, I reviewed the prefiled direct testimony of Chad Prater, Freddy Morgan, Satya Madivala, and Steve London on behalf of Petitioner, City of Cartersville, as well as the prefiled rebuttal testimony of Satya Madivala and Stephen Mullen filed on behalf of Petitioner.

Q: As it relates to the "single-metered service" issue, what is your testimony?

A: Mr. Dyke and Mr. Lees both seem to suggest that, because the Atkore facility has more than one meter, it does not have "single-metered service" under the Territorial Act. However, in my experience, it is not uncommon for a large facility (like the Atkore facility) to have multiple meters, especially when there are multiple service points at the facility. In fact, the electric supplier to the facility will often suggest or even require multiple meters, even for a single customer at the same facility. But so long as those meters are serving the same premises and are billed to the same customer, that would still be considered "single-metered service" under the Territorial Act.

Q: As it relates to the "connected load" issue, what is your testimony?

A: In his prefiled direct testimony, when asked about the "connected load," Mr. Dyke speaks in terms of "peak usage." Those two things are not the same. Connected load refers to the total electrical capacity of all devices and appliances connected to a system, regardless of whether they are operating simultaneously. Peak usage, on the other hand, is the highest amount of power consumed at a specific point in time.

Q: How do you determine a facility's "connected load . . . at the time of initial full operation of the premises?"

A: To determine a facility's "connected load . . . at the time of **initial** full operation of the premises," you typically look at the construction plans for the facility, and often a "load study" is done.

Q: Have you reviewed a "load study" for the Atkore facility?

A: Yes, I have.

Q. Let me show you what I've marked as Exhibit P24. Do you recognize this document?

A: Yes.

Q. And what is this document?

A: This is a copy of a report from a load study conducted by TL Engineering, dated May 31, 2023, which I've reviewed.

[Review its terms]

Q: Have you reviewed the construction drawings for the Atkore facility?

A: Yes, I have.

Q. Let me show you what I've marked as Exhibit P14. Do you recognize this exhibit?

A. Yes.

Q. And what are these documents?

A. These are construction plans for the Atkore facility. They contained a second load study dated August 30, 2023.

[Review its terms]

Q. And what did the two load studies show?

The May 31, 2023 load study showed a total load of 1514.94 kVA, and the August 30, 2023 showed a higher total load of 1543.14 kVA.

Q. And based on your review of these documents and the other documents you mentioned earlier, what is your testimony as to the connected load at the Atkore facility at the time of initial full operation of the premises?

A: That it easily exceeded 900 kilowatts.

Q: Does this complete your testimony?

A: Yes.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the herein and foregoing **PREFILED REBUTTAL TESTIMONY OF ROBERT BENJAMIN ("BEN") BOUCHER, P.E. FILED ON BEHALF OF PETITIONER THE CITY OF CARTERSVILLE, GEORGIA** by e-mail as follows:

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This 20th day of June, 2025.

SMITH CONERLY LLP

/s/ Charles S. Conerly
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ATTORNEYS FOR CITY OF CARTERSVILLE

402 Newnan Street
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TOTAL LOAD STUDY

LOAD TYPE	LOAD (KVA)
LIGHTING	141.00
RECEPTACLES	44.00
MISC.	2.24
AC MOTORS	456.00
A/C	120.00
HEATING	9.00
WATER HEATER	6.75
MISC. CONTINUOUS	206.74
MISC. NON-CONTINUOUS	444.32
KITCHEN	0.00
SPARE	0.00
TOTAL	0.00
TOTAL LOAD	1414.06

MOTOR ESTIMATION NOTE

THE LARGEST EXISTING MOTOR IS THE 100HP FIRE PUMP. THE LARGEST NEW MOTOR IS A 30HP AIR COMPRESSOR.

SWITCHBOARD - AMSB (EXISTING)

CKT #	CIRCUIT BREAKER	CIRCUIT DESCRIPTION	CONNECTED LOAD (KVA)
1	SPARE	SPARE	0.00
2	100/3	SPARE	0.00
3	100/3	SPARE	0.00
4	100/3	SPARE	0.00
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			

LIGHTING LOAD	141.00 KVA	DEMAND FACTOR	141.00 KVA
A/C LOAD	120.00 KVA	DEMAND FACTOR	120.00 KVA
MISC. NON-CONT.	444.32 KVA	DEMAND FACTOR	444.32 KVA
TOTAL CONNECTED LOAD	1414.06 KVA	TOTAL DEMAND LOAD	1414.06 KVA
TOTAL CONNECTED AMPS	1414.06 KVA	TOTAL DEMAND AMPS	1414.06 KVA

NOTES:

3D PANELBOARD - HXX

CKT #	AMP/POLE	CIRCUIT DESCRIPTION	CONNECTED LOAD (KVA)	CIRCUIT DESCRIPTION	AMP/POLE	CKT #
1						1
2		(3) MOLD CHARGERS	24.84	24.84	30A/ TYPE TRANSFORMER - TYP		2
3			24.84	24.84	3 PHASE (BOMB) - LOAD		3
4			24.84	24.84			4
5		(2) CROWN CHARGERS	20.27	7.68	30A/ CANOPY FANS		5
6			20.27	7.68			6
7			18.53	7.68			7
8		(2) ENGEL CHARGERS	18.53	23.52	SAWS		8
9			18.53	23.52			9
10		(2) BOY CHARGERS	12.67	27.08	3 PRESSES		10
11			12.67	27.08			11
12			12.67	27.08			12
13		10K OFFICE, MODULAR OFFICES	67.77	19.40	AUTOMATED WELDMENT ROBOTIC STATION		13
14			63.67	15.40			14
15			63.67	15.40			15
16			63.67	15.40			16
17		(5) HALE PAIR	4.16	27.72	COMPRESSED AIR		17
18			4.16	27.72			18
19			4.16	27.72			19
20		(3) PROMAXIC LEVELERS	19.62	9.60	CRANE INFEED		20
21			19.62	9.60			21
22			19.62	9.60			22

LIGHTING LOAD	0.00 KVA	DEMAND FACTOR	0.00 KVA
A/C LOAD	0.00 KVA	DEMAND FACTOR	206.74 KVA
MISC. NON-CONT.	0.00 KVA	DEMAND FACTOR	0.00 KVA
TOTAL CONNECTED LOAD	206.74 KVA	TOTAL DEMAND LOAD	206.74 KVA
TOTAL CONNECTED AMPS	206.74 KVA	TOTAL DEMAND AMPS	206.74 KVA

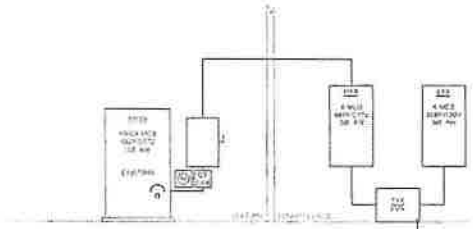
NOTES:

3D PANELBOARD - LXX

CKT #	AMP/POLE	CIRCUIT DESCRIPTION	CONNECTED LOAD (KVA)	CIRCUIT DESCRIPTION	AMP/POLE	CKT #
1			9.00			1
2		(2) WELDING STATIONS	9.00			2
3			9.00			3
4			6.24			4
5		(3) PLASMA TRACTI-LOCATION	6.24			5
6			6.24			6
7			9.00			7
8		(1) PLATE LASER	12.69			8
9			12.69			9
10			12.69			10
11						11
12						12
13						13
14						14
15						15
16						16
17						17
18						18
19						19
20						20
21						21
22						22
23						23
24						24

LIGHTING		DEMAND FACTOR	100.00%
A/C		WATER HEATER	100.00%
MISC. NON-CONT.	0.00 KVA	MISC. CONT.	206.74 KVA
TOTAL CONNECTED LOAD	206.74 KVA	TOTAL DEMAND LOAD	206.74 KVA
TOTAL CONNECTED AMPS	206.74 KVA	TOTAL DEMAND AMPS	206.74 KVA

NOTES:



1 RISER DIAGRAM

EXHIBIT

P24

TL ENGINEERING

PROGRESS SET

ISSUE AND REVISION

PROJECT NAME

ATKORE

ANDY MAY CONSTRUCTION CO.

SHEET TITLE

LOAD ESTIMATION

SHEET NUMBER

ESK-1

HINES ATKORE TI

1181 CASSVILLE-WHITE ROAD, NE
WHITE, GA 30184

ARCHITECTS PROJECT # 236050

A PROJECT FOR

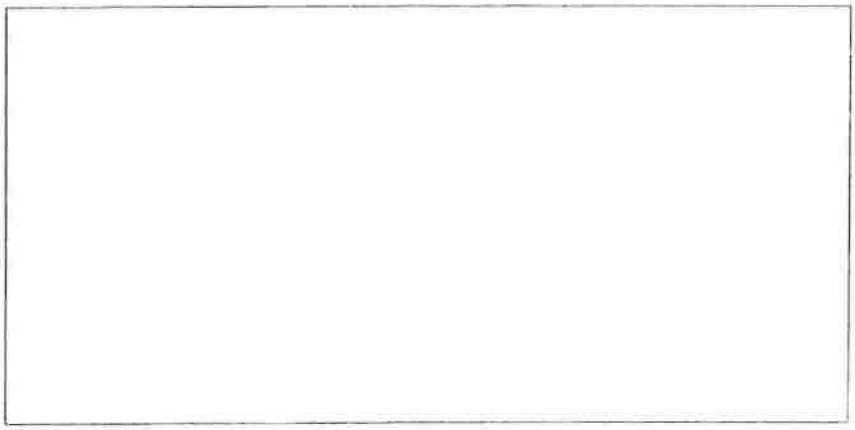
HINES

STRUCTURAL

ELECTRICAL

OWNER

ARCHITECT







236050

HINES ATKORE TI

EXHIBIT

P14