STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Public Service Company of New Hampshire, d/b/a Eversource Energy, pursuant to 30 V.S.A. § 248, for a certificate of public good authorizing the rebuild of Eversource's 115 kV electric transmission line in the Towns of Waterford and Concord, Vermont	Case No. 24-____-PET

PREFILED TESTIMONY OF SAMUEL HARRIS ON BEHALF OF EVERSOURCE ENERGY

November 14, 2024

Mr. Harris' prefiled testimony describes the overall project, the project schedule, introduces other witnesses offering testimony, and addresses the following Section 248 criteria: advance notice & public outreach (30 V.S.A. § 248(f) & Rules 5.402, 5.403(A)(3) & 5.403(A)(20)); need for the project (30 V.S.A. § 248(b)(2); system stability and reliability and impacts upon the transmission system (30 V.S.A. §§ 248(b)(3) and 248(b)(10)); economic benefit ((30 V.S.A. § 248(b)(4); greenhouse gas emissions (30 V.S.A. § 248(b)(5)); noise (30 V.S.A. § 248(b)(5)); public health & safety (30 V.S.A. § 248(b)(5)); waste disposal (10 V.S.A. § 6086(a)(1)(B)); water conservation (30 V.S.A §248(b)(5) & 10 V.S.A. § 6086(a)(1)(C)); sufficiency of water and burden on existing supply (10 V.S.A. § 6086(a)(2) & (3)); transportation systems/traffic (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(5)); educational and municipal impacts (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(6) and (7)); and development affecting public investments (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(9)(K)).

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1. Introduction

Q1. Please state your name, occupation, business address, and experience and qualifications.

A1. I am a Senior Project Manager with Transmission Construction Management for Eversource Energy Service Company. I perform activities required to manage project development for electric transmission projects for Public Service of New Hampshire, d/b/a Eversource Energy ("Eversource" or the "Company"), including presenting the details of transmission projects to municipal bodies and regulatory agencies, as well as to the Independent System Operator-New England ("ISO-NE") Planning Advisory Committee ("PAC"). I received an Associate of Science degree in Civil Engineering Technology from Springfield Technical Community College in 2005 and a Bachelor of Science degree in Architecture from Wentworth Institute of Technology in 2009. Prior to joining Eversource, I was employed as a Project Manager with the firm Henkels & McCoy and Utility Line Management in California from 2010 to 2018. Since joining Eversource, I have held positions as both Project Manager and Senior Project Manager of Transmission Construction Management. My business address is 13 Legends Drive in Hooksett, New Hampshire.

Q2. What is the purpose of your testimony?

A2. Eversource owns and operates the so-called Q195 line, a 17.5 mile 115-killovolt ("kV") wood H-frame electric transmission line located in both New Hampshire and Vermont that extends from Littleton Substation in Littleton, New Hampshire, to Whitefield Substation in Whitefield, New Hampshire, with an approximately 9-mile portion traversing the Towns of Waterford and Concord in Vermont. Eversource plans to rebuild this line by replacing all existing structures and wires (the "Project"). My testimony describes the overall Project, the Project schedule, introduces other witnesses offering testimony, and addresses the following Section 248 and Rule 5.402 criteria: advance notice & public outreach (30 V.S.A. § 248(f) & Rules 5.402, 5.403(A)(3) & 5.403(A)(20)); need for the project (30 V.S.A. § 248(b)(2); system stability and reliability and impacts upon the transmission system (30 V.S.A. §§ 248(b)(3) and 248(b)(10)); economic benefit ((30 V.S.A. § 248(b)(4); greenhouse gas emissions (30 V.S.A. § 248(b)(5)); noise (30 V.S.A. § 248(b)(5)); public health & safety (30 V.S.A. § 248(b)(5)); waste disposal (10 V.S.A. § 6086(a)(1)(B)); water conservation (30 V.S.A §248(b)(5) & 10 V.S.A. § 6086(a)(1)(C)); sufficiency of water and burden on existing supply (10 V.S.A. § 6086(a)(2) & (3)); transportation systems/traffic (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(5)); educational and municipal impacts (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(6) and (7)); and development affecting public investments (30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(9)(K)).

Q3. Please identify each of the witnesses other than yourself that will submit testimony and identify the topics they will cover.

A3. Ryan Scott of VHB will offer additional testimony and reports prepared by VHB experts to support this Project, with respect to natural resources, historic and cultural resources, and aesthetics.

2. Overview, Project Description & Schedule

Q4. Please describe Eversource and provide an overview of the Project and construction schedule.

A4. Eversource operates New England's largest energy delivery system, serving customers in New Hampshire, Connecticut, and Massachusetts. The Q195 Line ("Line") was originally constructed in 1958 and is connected to Eversource's New Hampshire high voltage transmission network. A USGS Map included with my testimony as Exhibit PET SH-1, shows the geographic location of the Line, which extends approximately 17.5 miles, approximately 9 miles in the state of Vermont.

The Line occupies an established Eversource right-of-way ("ROW") that varies from 140 feet to 150 feet in width within a multiple ROW utility corridor which varies from 265 feet to 325 feet at full width and is maintained edge to edge. For approximately 5.4 miles, from structure 208 in Waterford north to structure 141 in Concord, the Q195 Line ROW is

adjacent to National Grid's 450-kV DC Line 451 & 452 ROW abutting to the northwest. A National Grid 34 kV sub-transmission line ROW abuts the Eversource Q195 Line ROW to the southeast for a distance of approximately 7.6 miles.

The 115 proposed structure replacements supporting the Q195 Line in Vermont are primarily of wood and are of an "H-frame" design, except for 15 wood 3-pole structures and two weathering steel structures. The structure replacements are needed for various reasons. Recent physical inspections and engineering analysis of the Line revealed that many of the existing 65-year-old structures are in poor condition from woodpecker damage, insect damage, and pole rot. Due to age and condition issues, replacement of these existing structures is necessary to allow Eversource to continue to provide safe and reliable service to its customers. Other structure replacements are driven by the need to replace the existing aged conductor. The conductor requires replacement in order to avert overloading under certain operating conditions, as modeled by both Eversource and the Independent System Operator – New England. The three wires (conductor) will be replaced with 1272 aluminum steel supported conductor ("ACSS"), which is heavier than the existing conductor, resulting in a physical overload condition on many of the existing structures which must be replaced to support the new conductor. In addition, yet a number of other structures need to be replaced because of further loading resulting from the replacement of the existing static wire with Optical Ground Wire ("OPGW"). This scope of the proposed Project is part of an Eversource reliability initiative to add reliable high-speed, high-

capacity intra-system communications to all Eversource substation and transmission facilities over the next six years to facilitate outage response and reliability objectives. Specific to transmission lines, the OPGW will continue the lighting protection function of the existing static wire as well as facilitate intra-system communications. And finally, given the age of the line and the scope of the other structure replacements, Eversource is proposing to replace all the remaining aged wood structures after careful consideration of Project costs to an incremental approach and avoidance of increased environmental impacts that would arise from repeated disturbance of the ROW resulting from an incremental approach. All structures will be replaced with weathering steel structures of the same design as the existing structures, which is more resilient to severe weather and insect and natural environment degradation. Currently some of the structures exhibit cross bracing. The corresponding replacement structures will also have cross bracing. No additional cross bracing will be added. Existing lightning arrestors will be transferred to the replacement conductors and no new lighting arrestors will be added.

The replacement structures will be placed in substantially the same locations as the existing structures. Maps of the Vermont portion of the Line depicting the locations of the Q195 existing and proposed replacement structures are included with my testimony as Exhibit PET SH-2.

The average height of the existing structures in Vermont is 45.3 feet. The average height of the proposed replacement structures in Vermont is 56.6 feet. Height increases range

from 1.2 feet to 28.7 feet, with one proposed structure in Concord to increase 35.9 feet. Height increases are primarily driven by the need to adhere to the current National Electrical Safety Code ("NESC") clearance requirements and Eversource standards, taking into account loading conditions, topography, road crossings, as well as technical considerations, such as uplift, which describes a condition where wire on a structure pulls up on the hardware instead of applying load downward as is typically the case. Uplift imposes stresses on the structure and hardware from being pulled up, resulting in forces that the structures were not designed to withstand. See Exhibit PET SH-3 depicting typical cross sections of the Line.

Q5. Please describe the proposed Project construction.

A5. The work will entail the construction of new access roads, both in ROW and off-ROW, in certain locations to avoid sensitive environmental conditions and achieve construction efficiencies, though existing access roads will be utilized to the extent possible and provide a substantial measure of needed access to each work site. Existing access roads may need to be improved (hardened and/or widened) to accommodate construction vehicles. Gravel or matted work pads not to exceed approximately 100 feet by 100 feet will be required at structure locations to provide a safe, level work area. Some additional pull pads of approximately 30 feet by 100 feet will be required to install the new conductor and OPGW, though helicopters may be used for stringing. Existing and proposed access roads, work pad and pull pad locations are depicted on the Project

Mapsheets, Exhibit PET SH-2.

Limited tree removal may be required for the Project within one off-ROW access road to widen an existing Class IV road to accommodate the passage of heavy equipment, which may entail the removal of up to ten trees. Mowing and some select removal of incompatible species within the ROW may be required.

The sequence of construction activities is generally as follows:

- Establishing equipment and material laydown or staging areas and marshaling yards;
- Vegetation removal;
- Installation of initial erosion & sedimentation controls, as needed;
- Access road and work pad construction;
- Structure foundation installation;
- Structure erection and installation of counterpoise;
- Conductor and OPGW installation;
- Structure removal; and
- Restoration.

At the completion of the Project, matted work pads, matted access roads and graveled pull pads will be removed and disturbed areas restored. Upland areas will be sprayed with a mixture of native grass seed. Wetland areas will re-vegetate naturally after the

removal of the temporary matting. Gravel work pads and the new as well as improved access roads will remain to facilitate future maintenance work, though the gravel work pads will be reduced in size to 30 feet by 60 feet.

Not all Project construction activities will follow the sequence above continuously in the same location until the replacement work is complete. Also, multiple crews may be working at various tasks simultaneously within the Project area. During construction the existing conductor will remain in service until the new structures and conductor are installed. The existing structures and conductor will be removed after the re-built line is in service.

Typical construction vehicles and equipment associated with the work would include, but not be limited to, pickup trucks, bucket trucks, flat-bed trucks, excavators, concrete trucks, drill rigs, front loaders, reel trailers, bulldozers, woodchippers, brush hogs/mowers, forklifts, side booms, dump trucks and cranes. Pullers and tensioners will be used for the line work. Guard trucks and/or temporary guard structures would be used for protection of roads during line pulling activities.

Q6. How will the transmission corridor be accessed?

A6. The access points are illustrated on the Project Mapsheets, Exhibit PET SH-2. As shown on the Mapsheets, the Q195 Line occupies an existing utility ROW adjacent to two other

utility line ROW's and, where feasible, existing access roads will be utilized. In some locations, Eversource has coordinated with local landowners to utilize existing private off-ROW access where in-ROW access is impractical owing to topography and resource conditions.

Q7. Will lay down areas be utilized during construction?

A7. Yes, we are planning to use laydown areas. Eversource plans to use a staging/laydown area in New Hampshire that is current utilized for similar rebuild projects. However, Eversource is also intending to use the proposed pull pad between structures 158 and 159 for the temporary storage of material. This proposed laydown area is identified in Exhibit PET SH-2.

Q8. Will any blasting be required?

A8. No.

Q9. How will equipment be delivered to the Project site?

A9. Equipment and materials for the Project would be transported to the Project ROW by conventional truck transport, utilizing flatbed trailers for a majority of deliveries, via existing state and town roads.

Q10. Please describe any special measures that will be undertaken to avoid or mitigate impacts to natural resources.

A10. As stated in the Natural Resource Report provided as Exhibit PET RMS-2, the Project will avoid and mitigate unduly adverse impacts to natural resources. These measures include:

- Within flood hazard areas and river corridors, new structures will be located at or further away from stream channel than the existing structures and workpads will not restrict floodwaters;
- Access roads and structure replacements have been located so as to limit impacts to wetlands and streams to the extent possible. The Project will also adhere to applicable best management practices issued by the Vermont Department of Environmental Conservation and conditions of any Project permits. including installation of temporary construction matting and work under frozen or dry ground conditions where feasible;
- The Project will avoid or mitigate impacts to listed Rare, Threatened and Endangered ("RTE") species, natural communities, and necessary wildlife habitats through a combination of planned avoidance of impacts to known sensitive areas, selective time of year considerations, and installation of construction matting to minimize disturbance during the execution of the work. As explained in the natural resources report, Eversource will also obtain a Vermont Individual Stormwater Construction Permit ("Stormwater Permit"), which will include Project specific erosion prevention and sediment control measures.

Q11. What is the anticipated Project construction schedule?

A11. The entire Project is currently scheduled to begin construction in 2026 and will continue for approximately 24 months but is dependent on sequencing and outage scheduling for other planned work in the area. The duration of the construction in Vermont is not known at this time. However, construction activities will not occur continuously in any specific work area for extended periods of time.

Q12. During what hours will construction occur?

A12. The construction hours for the Project will be from 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturday, and shall cease on Sundays and state and federal holidays except where construction activities that must be performed during a limited outage of the existing Line, required for worker safety, or need to be completed during the duration of the outage prior to the existing Line being recalled to maintain system reliability. Weather delays, storm events and other events on the transmission system may delay or abbreviate the duration of a planned outage, necessitating the need to accelerate the work and extend construction work hours.

3. Advance Notice [30 V.S.A. § 248(f) and Rules 5.402 & 5.403(A)(3)] & Public Outreach [Rule 5.403(A)(20)]

Q13. Please summarize all community outreach efforts undertaken by Eversource in advance of filing its petition.

A13. Outreach to property owners and municipalities in support of the Q195 Line Rebuild Project began in late spring 2022, as field survey and Phase 1B archeological survey notifications were sent to abutters over the month of June. Municipal Project introduction briefings to all the affected towns, including Concord and Waterford in Vermont, were completed throughout the fall of 2022. Project introduction notifications were mailed to abutters in February 2023, and correspondence with those abutters along the line has continued through 2024. Project staff received an inquiry regarding when construction would begin, and an inquiry for assistance with road repairs and maintenance on Johnson Road in Concord after the July 2024 floods that impacted the Northeast Kingdom. Project staff contacted both property owners, providing information on the anticipated Project and construction schedule, qualifying that work activities are weather dependent and subject to change. No further concerns have been raised.

Following a Project introduction meeting with the road agent and town administrator, the Town of Concord granted Eversource permission to perform maintenance and improvements on town roads prior to Project installation. As part of temporary access agreements Eversource has signed with property owners along Ruszin Drive, commitments were made to install a gate to address trespassing concerns, along with maintenance of the road surface to the same standard as the town-owned section.

Additional commitments for advanced notice ahead of any activities within the right-of-way have been made to property owners in Concord.

Eversource also coordinated with Great River Hydro to execute a geotechnical boring scope in the vicinity of the downstream toe of Moore Dam. The concern was relative to the potential for the geotechnical borings to inadvertently create a breach in the dam. With support from engineering, Eversource allayed these concerns by presenting a contingency plan, should artesian conditions be encountered while performing the work. Eversource has also committed to advanced notice of any aircraft operations in the vicinity of Moore Dam.

Q14. Did Eversource provide a 45-day advance notice of the proposed Project to adjoining landowners, the local planning commissions and selectboards, and the regional planning commission?

A14. Yes. On August 12, 2024, Eversource mailed the 45-day advance notice to the adjoining landowners, the selectboards and planning commissions of the Towns of Concord and Waterford, Vermont, and to the Northeastern Vermont Development Association. Notice of the filing was also sent to Vermont administrative agencies through the Commission's electronic filing system, PUC.

Q15. Please summarize all comments received in the 45-day advance notice period, including written and oral comments and the Petitioner's response to such comments.

A15. No comments were received from the municipalities or abutting landowners. Eversource received comments from the Vermont Agency of Natural Resources ("ANR"). ANR's comments focused primarily on RTE species, Deer Wintering Areas, Pool-Breeding Amphibians, Streams and Riparian Buffers and Flood Hazard Areas and River Corridors and specified additional information or clarifications that the Project should provide in its petition. These include, but are not limited to; results of an RTE plant survey and specific measures to avoid, minimize and mitigate impacts to all RTE plant species, time of year restrictions or limitations for certain construction activities, detail and mitigation for all work activities within the 100-foot vernal pool envelope and the 650-foot Life Zone, a plan to address replacement of pre-existing culverts damaged during the course of the Project, clarification as to where Project activities may be proximate to a Bald Eagle's next and efforts to avoid, minimize and mitigate impacts, if necessary and refine Project mapping to depict Special Flood Hazard Areas, distances between existing structures and corresponding replacement structures and confirmation that the Project will not require Stream Alteration Permit for the temporary crossing of Roaring Brook.

In response, the Project mapping has been updated and further requested detail has been provided in the Natural Resources Report (Exhibit PET RMS-2).

4. Need for the Project [30 V.S.A. §§ 248(b)(2)

Q16. Is the Project needed for present and future demand for electric service which could not otherwise be provided in a more cost-effective manner through energy conservation programs and measures and energy efficiency and load management measures?

A16. Yes. As previously mentioned, the Project is needed to address aging infrastructure and system reliability. Eversource needs the Project to replace deteriorated and deteriorating assets, reducing the likelihood of an in-service failure that could lead to long-term interruptions of the transmission system as well as customer outages and to upgrade the reliability of the line through the installation of current equipment communication technology. Eversource does not need this Project to serve increased load growth. In addition, the Project's replacement of existing static wire with OPGW will improve Eversource's intra-system communications, thereby improving reliability and outage response. The need for these improvements cannot be addressed through energy efficiency and load management.

5. System Stability and Reliability and Impacts on the Transmission System [30 V.S.A. §§ 248(b)(3) and 248(b)(10)]

Q17. Will the Project have an undue adverse impact on system stability or reliability or adversely impact the transmission system?

A17. No. The Project is a line replacement project which does not change the capacity of the Q195 Line. Further, as indicated above, the Project will improve the reliability and resiliency of the Q195 Line and therefore will improve system stability and reliability of the interconnection grid network. The Project replacement will not adversely impact the Vermont transmission system.

6. Economic Benefit [30 V.S.A. §§ 248(b)(4)]

Q18. Will the Project result in an economic benefit to the State and its residents?

A18. Yes. As an aged asset, the book value and taxable value of Q195 Line is largely depreciated. The replacement facilities will provide enhanced taxable income for the local communities of Concord and Waterford. In addition, the Project likely will create short-term benefits to local businesses that provide support services for equipment and construction crews, such as vehicle fuel services and food services.

7. Noise, Greenhouse Gas Emissions/Air & Water Purity [30 V.S.A. § 248(b)(5)]

Q19. Will the Project result in undue noise impacts or increase greenhouse gas emissions?

A19. No. The Project does not involve replacement of transformers or other noise-emitting equipment and the Q195 Line does not emit greenhouse gas emissions. Noise and vehicle emissions will be minimal and temporary from operating construction vehicles and equipment.

Q20. Will the Project have an undue adverse impact on water purity?

A20. No. As discussed in the Natural Resources Report, Exhibit PET RMS-2, the Project will avoid undue adverse impacts to water resources. Additionally, as explained in my testimony, below, the Project will appropriately address waste disposal and soil erosion and stormwater runoff prevention.

8. Public Health & Safety [30 V.S.A. § 248(b)(5)]

Q21. Will the Project have any adverse effects on the safety of the public safety?

A21. No. The Project will be an improvement for public health and safety in that it will improve the reliability of the electric transmission grid and will be designed and constructed in accordance with current NESC and other applicable regulatory requirements. Eversource will use quality materials and all construction workers and contractors will adhere to Eversource's best practices for maintaining public health and safety throughout the construction phase of the Project.

9. Waste Disposal [10 V.S.A. § 6086(a)(1)(B)]

Q22. Will the Project involve any discharges or injections of groundwater or otherwise adversely impact water purity?

A22. No. The Project will meet all applicable Vermont Department of Health and Vermont Department of Environmental Conservation ("DEC") regulations regarding the disposal of wastes, and which will not involve the injection of waste materials or any harmful or toxic

substances into groundwater or wells. Retired and unused materials associated with the Project will be recycled or disposed of as appropriate and in compliance with all applicable regulations and Eversource policies. Any groundwater from dewatering activities in wetlands will be filtered with appropriate media (e.g., filter bag, vegetated upland, etc.) and allowed to infiltrate back into the surrounding ground, per standard BMPs.

10. Water Conservation [10 V.S.A. § 6086(a)(1)(C)]

Q23. Please describe any water conservation measures.

A23. Use of water will be limited to what is necessary to control dust during construction and to promote germination of seed in areas to be re-seeded.

11. Sufficiency of Water and Burden on Existing Supply [10 V.S.A. § 6086(a)(2) & (3)]

Q24. Please describe the sufficiency of water and the burden on existing water supply.

A24. The Project will not unreasonably burden existing water supply.

12. Transportation Systems/Traffic [10 V.S.A. § 6086(a)(5)]

Q25. Please describe the potential impact with respect to the use of public roads during construction.

A25. There will be no long-term transportation impacts, and only short-term, periodic minor impacts to traffic flow due to deliveries of equipment and materials to specific access points

along the ROW during construction. Eversource will coordinate with the affected municipalities regarding any specific traffic management needs.

13. Impacts on Educational Services and Municipal Services [10 V.S.A. § 6086(a)(6) and (7)]

Q26. Please describe the potential impact with respect to the provision of educational and municipal services.

A26. No educational or municipal services will be impacted by the Project. Use of municipal roads to transport equipment and materials will be limited in duration and temporary for the duration of the Project.

14. Development Affecting Public Investments [10 V.S.A. § 6086(a)(9)(K)]

Q27. Act 250 Criterion 6086(a)(9)(K) provides:

> A permit will be granted for the development or subdivision of lands adjacent to governmental and public utility facilities, services, and lands, including highways, airports, waste disposal facilities, office and maintenance buildings, fire and police stations, universities, schools, hospitals, prisons, jails, electric generating and transmission facilities, oil and gas pipe lines, parks, hiking trails and forest and game lands, when it is demonstrated that, in addition to all other applicable criteria, the development or subdivision will not unnecessarily or unreasonably endanger the public or quasi-public investment in the facility, service, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of, or the public's use or enjoyment of or access to the facility, service, or lands.

Please address whether any such public investments are in the vicinity of the Project, and whether the Project will unnecessarily or unreasonably endanger the public or quasi-public investment in any facility, service, or lands, or materially jeopardize or interfere with the

function, efficiency, or safety of, or the public's use or enjoyment of, or access to any such facility or service.

A27. The Project will not unnecessarily or unreasonably endanger public or quasi-public investments in facility, service, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of the public's use or enjoyment of, or access to any such facility or service. In re-building an existing transmission line within an existing ROW, the Project does not introduce new impacts on any public investments. Due to the staged aspect of construction activities within the ROW and the number of access points to reach specific work sites, the Project will not adversely impact the public's use of roadways. In fact, as noted above, certain road improvements request by the Town of Concord will be undertaken prior to Project construction to improve road access.

15. Compliance With State Comprehensive Energy Plan [30 V.S.A. § 248(b)(7)]

Q28. Is the Project in compliance with the Vermont 2022 Comprehensive Energy Plan ("CEP")?

A28. Yes. As stated in the CEP Executive Summary, the "grid needs to continue to perform — to reliably deliver the required energy to customers, every hour of the year … under increasing pressure from severe weather events and cyberattacks …." The CEP is available at: https://publicservice.vermont.gov/sites/dps/files/documents/2022VermontComprehensiveEnergyPlan_0.pdf. The Project is designed to bolster grid reliability and resilience,

which are important objectives of electric grid planning under the CEP Section 4.5.5.

The Project is consistent with the CEP.

16. Conclusion

Q29. Does this conclude your testimony?

A29. Yes.

AFFIDAVIT OF SAMUEL HARRIS

On this 14th day of November 2024, I, Samuel Harris, do hereby swear and affirm that the information provided in my Prefiled Testimony and Exhibits is accurate to the best of my knowledge and that I have personal knowledge of, and am able to testify as to the validity of the information contained in my Prefiled Testimony and Exhibits. I declare that the above statements are true and accurate to the best of my knowledge and belief. I understand that if the above statements are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Samuel D. Harris

Samuel Harris