# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

**DOCKET UM 1818** 

RESPONSE TESTIMONY

**OF** 

**JOSH LANKFORD** 

ON BEHALF OF
UMATILLA ELECTRIC COOPERATIVE

**September 28, 2017** 

2	A. My name is Josh Lankford. My business address is 750 West Elm Ave., Hermiston,		
3	Oregon 97838.		
4	Q. Will you please provide a brief description of your current job and an overview of		
5	your background?		
6	A. I am currently employed by Umatilla Electric Cooperative ("UEC") as its Manager of		
7	Engineering. I have been at UEC since June of 2009 within the engineering department. I have		
8	Bachelor of Science degree in Electrical Engineering and a Master of Engineering degree in		
9	transmission and distribution engineering from Gonzaga University. I am a registered		
10	professional electrical engineer in the State of Oregon. I am actively involved in the National		
11	Rural Electric Cooperative Association's ("NRECA") transmission and distribution engineering		
12	committee – a group of volunteer engineers, operational and materials managers from electric		
13	cooperatives, NRECA staff, and engineering consultants who work with electric co-ops to assis		
14	Rural Utilities Services on the development, analysis and updating of federal technical standard		
15	guidelines and specifications. That group also monitors and reviews other engineering and		
16	operational standards, code changes, and new designs involving the transmission-and-		
17	distribution and supply-chain-management fields, so as to maintain the competitiveness of		
18	electric cooperatives within the electric utility industry.		
19	Q. On whose behalf are you appearing in this proceeding?		
20	A. I am appearing on behalf of UEC.		
21	Q. What is the purpose of your testimony?		
22	A. I will respond to the opening testimony of Thomas Wolff, who testified on behalf of		
23	Columbia Basin Electric Cooperative ("CBEC").		
24	Q. Can you summarize the dispute in this case?		
25	A. UEC is currently serving a large dairy operation owned by its member, Mr. te Velde, a		
26	portion of which includes an agricultural operation that provides feed for the dairy. While the		

Please state your name and business address.

1 **Q.** 

- 1 | majority of the dairy's operation is in UEC's service territory, six of the dairy's existing
- 2 | irrigation pivots extend into CBEC's service territory. CBEC believes it has the right to serve
- 3 | the portion of the dairy's operations that extend into its service territory. CBEC filed a
- 4 | complaint seeking confirmation of that right. Because the parties have referred to Mr. te
- 5 Velde's operations as the "Willow Creek Dairy" or "dairy", I will use that same wording in my
- 6 testimony.
- 7 Q. When did the dairy become a member of UEC?
- 8 A. Using the assumed business name Willow Creek Dairy, Mr. te Velde, applied for
- 9 membership with UEC on January 14, 2016. His application is attached as Exhibit 106 to the
- 10 testimony of Thomas Wolff. While the membership date is January 14, 2016, the "connect" date
- 11 on the accounts, as the billing transition from the previous party, is January 1, 2016. These
- 12 | accounts were installed under the previous owner's name and then transferred to the dairy.
- 13 Q. Where is the dairy in relation to UEC and CBEC service territories?
- 14 A. The map included with Exhibit 2 to CBEC's Complaint provides an overview of the dairy
- 15 | location and shows the boundary line between UEC's and CBEC's service territory. As you can
- 16 see on that map, there are parts of the dairy on both sides of that line.
- 17 | Q. Where does UEC provide service to the dairy?
- 18 A. There are several points of service where we have transformers and meters that feed the
- 19 various components of the dairy's operation. All of the facilities that we own, operate, and
- 20 maintain are located in UEC's service territory. A list of the meters and transformers with the
- 21 | associated UEC rate schedules is included with the Wolff Testimony as Exhibit 107. The
- 22 | location of the UEC facilities are depicted on Wolff Exhibit 108.
- 23 | Q. What types of facilities are being served at the dairy?
- 24 A. In general, UEC provides electric service to the entire dairy, including all of the
- 25 components that comprise the irrigation system. These facilities include the 6 irrigation pivots
- 26 | located in CBEC's service territory as well as more than 40 irrigation pivots in UEC's service

1	territory that are either existing or planned, and several water pumps and boosters.		
2	Q. How does UEC serve the 6 irrigation pivots in CBEC's service territory?		
3	A. UEC meter 8465525 served from transformer 3N26E346001 serves the 6 irrigation pivots		
4	in CBEC's service territory. The six irrigation pivots are also referred to as Cluster 608. The		
5	specific point of interconnection for the six irrigation pivots is in UEC's service territory.		
6	Q. Does UEC own facilities in CBEC's service territory that are used to serve Willow		
7	Creek Dairy?		
8	A. No.		
9	Q. Other than the 6 irrigation pivots in cluster 608, is all of the permanent load		
10	associated with the dairy installed on UEC's side of the line?		
11	A. Yes. In fact, this is confirmed by CBEC in its response to UEC's data request 19 (a).		
12	That data request is attached to my testimony as Exhibit UEC/101.		
13	Q. Is the load associated with the 6 irrigation pivots a majority of the dairy's total		
14	load?		
15	A. No, not even close. Whether you are looking at the actual usage recorded before June		
16	2017 or the installed capacity, more than 95 percent of the load is in UEC's territory. It is my		
17	understanding that the dairy is still developing and will add more facilities requiring electrical		
18	power, but that only one of those new facilities – an irrigation pivot – will be in CBEC's		
19	service territory. The percent of the overall load in UEC's service territory, therefore, will only		
20	increase as the dairy continues to develop.		
21	Q. What if you only looked at the irrigation component of the dairy, would the same		
22	hold true?		
23	A. Yes. The percentages would change, but the vast majority of the load associated with		
24	the irrigation facilities is associated with pumping water from the irrigation canal, which is		
25	located entirely in UEC's service territory. And if you look at the load associated with only the		

irrigation pivots, the majority of the pivots and load lie in UEC's service territory, and that

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1	number and load will increase in the coming years as the dairy continues its build out.			
2	Q.	What is the installed electrical capacity at the dairy?		
3	A.	The total installed transformer capacity is 14,775 kVA.		
4	Q.	How much of the dairy's electrical capacity does Cluster 608 account for?		
5	A.	The transformer serving cluster 608 represents 3.38% of the total installed capacity.		
6	Based on actual usage recorded before June 2017, cluster 608 represented approximately 4.075%			
7	of the dairy's peak demand.			
8	Q.	What percentage of the capacity of the transformer serving cluster 608 is		
9	attributable to the power needed for the six irrigation pivots in CBEC's service territory?			
10	A.	The nameplate capacity of that transformer is 500 KVa. If we assume the pivots to be no		
11	more than 85 HP of motor load total for the seven circles (six existing and one future) located in			
12	CBEC's service territory, that equates to about 63 kW of peak load. 63 kW is roughly 12% of the			
13	500 kVA transformer nameplate capacity.			
14	Q.	Does this conclude your testimony?		
15	A.	Yes, it does.		
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#### **BEFORE THE**

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### **EXHIBIT 101**

## ON BEHALF OF UMATILLA ELECTRIC COOPERATIVE

**September 28, 2017** 

### UEC DR 19(a) TO CBEC

Referring to the Opening Testimony of Thomas Wolff, CBEC/100 Wolff/12, lines 9-16:

a. Is it Mr. Wolff's testimony that Willow Creek Dairy consumes any electric power in CBEC's service territory other than the motors that operate the six irrigation circles referred to in lines 8-11 on page 4 of his testimony?

## CBEC RESPONSE TO DR 19(a)

No.