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3 **IN THE PUBLIC UTILITIES COMMISSION**
4 **FOR THE**
5 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

6 **Petition of the**
7 **Commonwealth Utilities Corporation**
8 **For Rate Relief in its Power, Water and**
9 **Wastewater Utilities**

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) **DOCKET 25-__**

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) **CUC's Testimony of:**
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) **Subject: Testimony as to the**
) **Reasonableness of Proposed Power,**
) **Water and Wastewater Rate Plan**

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) **Transmittal Date: October 31, 2025**
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34 **Prefiled Testimony of**
35 **Yvonne Ogumoro**
36 **Renewable Energy Engineer**
37 **Commonwealth Utilities Corporation**
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Section I – Introduction and Background**Q. Please state your name and your role in this proceeding.**

A. My name is Yvonne Ogunoro. I am a Renewable Energy Engineer with Commonwealth Utilities Corporation (CUC). I am testifying in support of CUC' Integrated Resource Plan (IRP) and the associated Request for Proposals CUC-RFP-25-021. This RFP is for Independent Power Producer- for Solar Photovoltaic (PV) with Battery Energy Storage Systems (BESS) to procure utility-scale solar PV with battery energy storage systems (BESS) on Saipan, Tinian, and Rota for a contract period of twenty-five (25) years.

Q. Please describe your background and work history with CUC.

A. I hold a Bachelor's Degree in Mechanical Engineering from Saint Martin's University and a Master's Degree in Environmental Engineering from California State University, Fullerton, completed in Spring 2017. My career with CUC began in November 2011 as an Engineer in the Water and Wastewater Engineering Section. I co-chaired the 2015 CUC Integrated Resource Plan and Energy Resource Request for Proposals, contracted to Leidos Engineering. During this time, I also served as project engineer and manager for several capital improvement projects, including waterline and tank replacements, as well as leak detection and repair initiatives.

From 2017 to 2021, I was assigned to Water and Wastewater Operations on Saipan, and from 2021 to 2023, I served as Water and Wastewater Utility Coordinator. In this role, I focused on strengthening community services, with one of my most notable accomplishments being the achievement and sustained delivery of 24-hour water service for the island of Saipan. I also oversaw resiliency projects such as the replacement of power poles for water facilities, the installation of new back-up generators across the island, and the reinstatement of Power Plant No. 3 in Isley Field. With the completion of these initiatives, CUC is now able to supply emergency electricity to approximately 70% of Saipan's water system in the event of a major disaster. These achievements were made possible through the dedication and collaboration of CUC's Power, Water, and Wastewater teams.



Since March 2023, I have served as an Engineer in the Renewable Energy Section under the Office of the Executive Director, where I support CUC's transition to clean and sustainable energy solutions. In this role, I worked with GHD Inc. and the CUC Power Team to complete the update of the CUC Integrated Resource Plan in March 2025. I have also assisted with multiple procurement efforts, including Invitations for Bids (IFBs) for temporary power supply and RFPs for the replacement of obsolete engines on Saipan and Rota. Additionally, I contributed to the preparation of CUC-RFP-25-021, which was recently approved for advertisement by the Commonwealth Public Utilities Commission (CPUC).

Q. What is the purpose of your testimony?

A. I will explain how the IRP identifies the least-cost, reliable resource path for CNMI and how the Solar PV with BESS RFP implements that path by competitively procuring dispatchable Solar + BESS resources for all three islands. The Solar BESS RFP was approved by the CPUC on August 22, 2025 and was issued by CUC on August 26, 2025.

Integrated Resource Plan

Q. Briefly, what is an Integrated Resource Plan?

A. An Integrated Resource Plan (IRP) is a comprehensive, long-term planning document that forecasts demand, evaluates supply options, assesses system impacts, and identifies the least-cost and most reliable portfolio to meet customer needs over time. The CNMI IRP includes demand forecasts for Saipan, Tinian, and Rota; multi-criteria evaluation of resource options; power system impact studies; and a financial analysis over a 20-year period.

Q. Why are the IRP and the Solar BESS RFP important to CNMI's economy and ratepayers?

A. CUC's existing power generation fleet is dominated by imported diesel, contributing to some of the highest and most volatile electric rates in the United States. Several of Saipan's diesel generating units are at end-of-life. Large-scale Solar + BESS is expected to reduce fuel dependence and operating costs and improve reliability. These are key drivers of affordability and economic stability.

Q. What resource portfolio did the IRP find to be most cost-effective?

1 A. Across all islands and load scenarios studied, Solar + Battery Energy Storage Systems (BESS)
2 consistently outperformed alternatives, delivering the lowest levelized cost of energy (LCOE)
3 and highest renewable penetration compared with business-as-usual (diesel) and solar-only
4 options.

5
6 **Q. What specific optimal configurations does the IRP recommend for each island?**

7 A. The IRP recommends the following "Solar + BESS" configurations for further development:

- 8 • Saipan - 60 MW PV with 48 MW/192 MWh BESS;
- 9 • Tinian - 10 MW PV with 8 MW/32 MWh BESS;
- 10 • Rota - 3 MW PV with 2 MW/8MWh BESS.

11
12 **Q. How does this compare to the diesel option, which represents business-as-usual for**
13 **CUC?**

14 A. The IRP did not pursue a business-as-usual financial case because continuing a fully diesel-
15 based system was not considered a viable option. The plan's cost analysis therefore focuses
16 on optimal configurations that reduce fuel exposure over a 20-year "whole-of-life" horizon.

17
18 **Q. Beyond energy costs, what system upgrades are needed to maintain reliability with**
19 **more renewables?**

20 A. The steady-state studies identify targeted upgrades. On Saipan, ~17.5 MVar reactive power
21 support at the main plant is required, plus new lines to connect Naftan (~2 km), and
22 Kalabera/Talafofo (2×12 km) sites. Tinian requires ~5.2 MVar reactive support and a ~1.5 km
23 line to connect Marpo Heights. Rota requires ~1 MVar reactive support; existing transformers
24 and cables are within limits. These upgrades ensure voltage and thermal limits are respected
25 as PV and BESS are added.

26
27 **Q. How does the IRP address the continued role of diesel generation?**

28 A. The financial modeling assumes that existing diesel units continue operating to meet demand.
29 However, fixed maintenance is significant, estimated to be approximately \$1.985 million per
30 unit per year. Further, complete engine replacements may be required during the planning



1 horizon. The IRP advises evaluating the opportunity cost of replacing diesel units versus
2 expanding solar/BESS when end-of-life decisions arise.
3

4 **Q. What enabling control systems and skills does CUC require in order to successfully**
5 **integrate these renewables resources?**

6 A. First, a unified “grid controller” is essential to coordinate thermal generation with new PV and
7 BESS and to maintain frequency and system reliability. CUC presently has limited exposure to
8 such systems; the IRP recommends investments in communications links (e.g.,
9 telephone/wireless where fiber is absent), SCADA enhancements, and staff training in grid
10 control and renewable operations.
11

12 **Q. What stakeholder engagement supported this plan?**

13 A. GHD conducted four workshops following Rural Utilities Service practices: a project kickoff
14 (May 22, 2023); a design/scorecard workshop (Feb 21, 2024); a stakeholder session
15 presenting the preferred plan and sensitivities (Jan 22, 2025); and the final report presentation
16 (March 28, 2025). All of these workshops solicited input from stakeholders who would be
17 impacted by this project.
18

19 **Q. How do the IRP’s findings translate into economic benefits for CNMI?**

20 A. The plan’s central value proposition is reduced exposure to imported fuel cost volatility and
21 improved reliability. These are two critical pillars of economic competitiveness for an island
22 economy. By shifting to the least-cost Solar + BESS configurations, the IRP targets lower
23 LCOE and reduced import dependence, directly supporting affordability and stability for
24 residents and businesses. The IRP explicitly ties its roadmap to “minimizing costs” and
25 “increasing sustainability and system reliability,” thereby underpinning CNMI’s economic
26 resilience.
27

28 **Q. How does the Solar BESS RFP translate the IRP into procurement?**

29 A. The Solar BESS RFP requires IPPs to deliver dispatchable Solar + BESS on each island,
30 consistent with the IRP’s conclusion that Solar + BESS with diesel is CNMI’s most viable mix.

Further, projects are required to reach commercial operation within 24 months of award under a long-term power supply agreement.

Q. What quantities of daily energy does the Solar BESS RFP target by island?

A. The daily energy quantities are as follows:

- Saipan: 240–300 MWh/day (≈40% of current daily consumption)
- Tinian: 18–22.5 MWh/day
- Rota: 12–15 MWh/day

Q. What procurement method and evaluation process are specified?

A. CUC chose competitive sealed proposals to allow negotiation and comparison of delivery options. Evaluation is two-phased:

- (1) Qualification of technical feasibility and proponent capability (price-blind), followed by
- (2) Detailed cost evaluation of qualified proposals.

Technical and Cost proposals must be separately sealed to reinforce the competitive bidding process.

Q. Which technologies and maturity requirements apply?

A. The scope includes Solar PV, BESS, a power-plant controller, and a grid-controller system. Only proven, utility-scale technologies with a greater than 5 years' reliable operation record are eligible. Unproven/exotic technologies are disqualified.

Q. What is the Solar BESS RFP's schedule for implementation?

A. The Solar BESS RFP schedule is shown in **Table YO-1**.



Table YO-1

RFP Milestone	Estimated Dates
Issue RFP - Advertisement	August 26, 2025
Pre-Proposal Conference and Webinar	September 9, 2025
Registration Deadline	The Proponent Registration Form must be submitted prior to 5:00 pm on September 26, 2025
Proponents' Questions (RFI) Deadline	September 26, 2025
CUC Responses to Questions Deadline	Responses from CUC will be submitted within 10 working days
Proposal Submittal Deadline	Proposals must be submitted prior to 10:00 AM (CHST) on October 30, 2025
Notification of Qualified Proponents	November 19, 2025
Begin Negotiations of Contract(s)	November 20, 2025
Notification of Intent to Award Contract(s)	November 26, 2025
CPUC Review and Approval of Contract(s)	December 12, 2025
Execution of Contract(s) - Notice to Proceed(s)	December 23, 2025

Q. What are the key price and savings benchmarks in the filing?

A. The filing uses an all-in energy price benchmark of ~\$0.145/kWh and an annual delivered energy of ~123,187,500 kWh for a 25-year term. Based on CUC's calculations, displacing daytime diesel generation yields estimated annual savings of **8-10 million gallons of diesel fuel**, depending on the energy delivered to CUC from the Solar BESS system. At a delivered price of \$2.75/gallon for ULSD, that results in an estimated **annual reduction of fuel expenses of \$22-\$27.5 million.**

Q. What is the expected impact on the Fuel Adjustment Charge (FAC)?

A. According to Economists.com, CUC's rate consultant, renewable energy that is produced at a cost of at or below ~\$0.145/kWh will reduce the FAC. The exact total is not known at this time. However, the obvious correlation is that if prices are lower, benefits would be further increased.

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Q. How will the projects be funded and overseen?

A. The filing requires funding through CUC's general operational account, that in turn are funded by rates approved by the CPUC. Any resulting power supply agreements are subject to CPUC approval.

Q. How do these actions support reliability and resilience?

A. The IRP's grid studies identify reactive support and line upgrades to maintain voltage/thermal limits with higher solar penetration, and the RFP requires proven technology with plant- and grid-controller capabilities so CUC can dispatch renewables alongside diesel. Together, these elements reduce outage risk and improve daytime supply adequacy for Saipan, Tinian and Rota.

Q. In closing, we have a couple of housekeeping questions. Did you prepare this testimony and exhibits, or were they prepared under your supervision and control?

A. Yes.

Q. Are the statements in your testimony true and correct to the best of your knowledge, information and belief?

A. Yes.

Q. If you were testifying live, under oath, today, would you say what appears in this, your prefiled testimony filing?

A. Yes.

Q. Does this conclude your prefiled testimony?

A. Yes, it does. However, we reserve the right to make any necessary adjustments during the course of these proceedings.



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DECLARATION

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The proceeding prefiled testimony, and the exhibits referred to therein, are true and correct to the best of my knowledge, information and belief. Signed under penalty of perjury.

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Yvonne Ogumoro

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September 12 2025

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