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Attorney for Guam Power Authority

BEFORE THE GUAM PUBLIC UTILITIES COMMISSION

IN THE MATTER OF:

GPA DOCKET NO. 25-07

**GUAM POWER AUTHORITY'S
STRATEGIC PROGRAM
MANAGEMENT OFFICE**

**SUPPLEMENT TO GPA PETITION RE
STRATEGIC PROGRAM
MANAGEMENT OFFICE IN RESPONSE
TO PUC COUNSEL REPORT**

In response to the PUC Counsel's report, the Guam Power Authority (GPA) hereby files a supplement to its Petition for the Strategic Program Management Office (SPMO) to assist with GPA's future projects. Based on the information provided herein and in its petition, GPA urges the PUC to approve GPA's petition.

I. Background

1. In 2010, the PUC first approved GPA's request to establish a program management office (PMO) to support the Smart Grid project. *See* Order re GPA Petition for use of 2010 Bond Funds, GPA Docket No. 10-01 (July 27, 2010). In that matter, the PUC authorized GPA to use up to \$3,277,902 in bond funds to establish and run a PMO for the Smart Grid project. Under the supervision of the then-manager of SPORD, GPA successfully executed the Smart Grid project with the PMO under consultant Black & Veatch (B&V).

1 2. In 2011, GPA returned to the PUC with a petition for an integrated¹ PMO to provide
2 professional and technical staff to support GPA's existing staff to manage the overall development
3 of its infrastructure program, improve operational efficiency, and promote employee development.
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5 *See Order re GPA Application of GPA Requesting Approval of the Procurement of an Integrated*
6 *PMO, GPA Docket No. 11-02 (Mar. 21, 2011). The PUC approved the application for GPA to use*
7 *bond funds to establish a PMO to address planned capital improvement projects, significant*
8 *military buildup requirements, and ongoing operational requirements. See id.*

10 3. With the PUC's approval, GPA engaged consultant R.W. Armstrong (RWA) for
11 the PMO under a contract in the amount of \$3.9 million. *See Order, GPA Docket No. 11-02*
12 *(Jan. 11, 2012). GPA's execution of the RWA PMO, however, would ultimately meet with less*
13 *success than the earlier PMO for the Smart Grid project.*

16 4. In fiscal year 2014, GPA returned to the PUC to seek its approval of an extension
17 of the RWA PMO contract, again in the amount of \$3.9 million, this time to be funded through the
18 LEAC. *See Order re Application of GPA Requesting Approval of the Procurement of an Integrated*
19 *PMO Contract, GPA Docket No. 14-02 (Dec. 30, 2013). The PUC, dissatisfied with GPA's*
20 *justifications, budgeting, and reporting, granted approval only in part and imposed certain*
21 *conditions, including a regular reporting requirement. See id.*

24 5. GPA later sought ratification of expenditures in excess of the authorized amount of
25 \$3.9 million for the RWA PMO. The PUC found that, by exceeding the amount of expenditure
26 authorized by the PUC, GPA had violated the PUC's order of January 11, 2012. *See Order, GPA*
27 *Docket No. 14-02 (Apr. 24, 2014). The PUC authorized its Counsel to perform an investigation of*
28 *GPA's PMO program. See id.*

¹ To include the Guam Waterworks Authority.

1 6. In 2014, GPA again sought additional funding for the RWA PMO. *See* Order, GPA
2 Docket No. 14-02, Order (July 31, 2014). In the meantime, the SPORD manager who oversaw the
3 Smart Grid project and B&V PMO notified the PUC of GPA's mismanagement of the RWA PMO.
4 This time, the PUC denied GPA's request for additional funding for the PMO, based on its findings
5 that GPA had failed to properly budget for the PMO, used the PMO for internal GPA management
6 purposes (e.g., communications, public relations, marketing), failed to provide adequate scope of
7 work and cost breakdowns, and failed to provide a cost-benefit analysis. *See id.*

10 7. The General Manager and Assistant General Manager for Engineering and
11 Technical Services (AGMETS) who supervised the RWA PMO left GPA and were replaced with
12 new management. The new General Manager, who joined GPA in 2014 and still occupies that
13 position today, inherited the RWA PMO debacle and worked assiduously with his new
14 management team to rectify the situation. The former SPORD manager who oversaw the Smart
15 Grid project with the B&V PMO currently occupies the AGMETS position and would be
16 responsible for overseeing any new PMO.

19 8. Since new management took over, there have been no untoward PMO-related
20 issues. Now, under the current docket, GPA's new management has petitioned the PUC to approve
21 the procurement of a Strategic PMO to support its existing and upcoming projects. PUC Counsel
22 intends to recommend to the PUC that GPA's request be denied. GPA addresses PUC Counsel's
23 objections in turn.

27 **II. GPA's Response to Report of PUC Counsel**

28 **A. Procurement of the SPMO is reasonable.**

29 PUC Counsel suggests that GPA's request for approval to establish an SPMO is
30 unreasonable because it diverts some 15 percent of funding away from the projects themselves,
31 thereby reducing available resources for the projects, principally in the case of grant-funded
32

1 projects, or alternatively in the case of revenue-funded projects, requiring GPA to raise additional
2 sources of funding elsewhere.

3 **GPA's Response:**

4
5 GPA has projects worth over \$70 million in the pipeline and expects to undertake grant
6 projects potentially worth at least an additional \$748 million more. Table 1 contains a listing of
7 the Engineering Division's current and near-future projects under CIP and other workload for the
8 new substation, project management, and distribution. Table 2 lists GPA's pending grant-funded
9 projects. GPA is pursuing work in engineering categories that include:
10
11

- 12 • substation, transmission and distribution engineering work; and
- 13 • cyber security specialist type services and physical security engineering, as needed,
14 limited mainly to one project addressing 29 substations and about 240 water and
wastewater standby generator systems.

15 Together, the two tables show the vast potential workload awaiting GPA in the near term.
16
17 GPA will need assistance with these projects, especially those that entail entirely new categories,
18 such as cyber security, for which there are few outside providers but also little internal expertise.
19 That makes the SPMO necessary.
20

21 In addition, GPA intends to use the SPMO mainly for grant-funded projects. As a result,
22 the SPMO will not impact rates. The grant monies generally include funding for engineering and
23 design, as well as in-kind services, making the SPMO an appropriate vehicle to deliver these
24 services. The SPMO will help GPA implement its system investments from grants.
25

26 Currently, GPA receives a great deal of grant money. This is because GPA is able to
27 commit to undertaking and completing its projects. GPA also helps other agencies make best use
28 of grant monies. GHURA, for example, has received a \$500 million block grant that it cannot
29 spend on its own. GPA can step in and help GHURA put the grant to good use.
30
31

32 The SPMO is what makes it possible for GPA to take on so many beneficial projects.
Without an SPMO, however, GPA lacks sufficient engineering capacity to sustain the workload.

As a result, without an SPMO, GPA will not be able to apply for as many grants as in the past. This can only hurt the people of Guam. Thus, GPA and indeed the island of Guam need the SPMO.

B. Procurement of the SPMO is prudent.

PUC Counsel contends that the SPMO would not be prudent based on GPA's past history with PMOs. In support of this, PUC Counsel cites to the PUC's 2014 Order listing past concerns about GPA's administration and oversight of the PMO services contract, including:

- (1) GPA's payment of amounts to the PMO contractor in excess of a PUC imposed ceiling;
- (2) GPA's failure to monitor expenditures under the PMO program;
- (3) GPA's program expenditures that exceeded the budget;
- (4) Lack of accountability in the PMO program;
- (5) Contract anomalies and lack of indication in PMO billings as to what services were performed; and
- (6) The relation of PMO activities to the internal functions of GPA such as media and public information functions, administrative support for GPA's budget office, handling customer service complaints, work on customer power and billing issues, and the implementation of plans for a new GPA office building.

GPA's Response:

GPA recognizes that it had an unfortunate past history with one PMO. Dwelling on the past, however, does not serve present day circumstances. Today's SPMO bears no relation to the previous PMO and the issues it raised in 2014. In fact, today's GPA leaders alerted the PUC to those past problems, worked to mitigate them, and can be counted on to conduct themselves in a professional, ethical manner. Today's GPA has an entirely different management team, with the following characteristics and practices:

- Under the current management team, GPA has religiously sought the PUC's approval when needed.
- GPA monitors its budget very carefully and issues no purchase orders outside the General Manager's approval authority, or the CCU's or PUC's.
- The SPMO process is basically task-based, because grants may have different scopes, volumes of work and specific requirements. GPA's projects will be monitored and approved by the engineering supervisor and managers of GPA. Tasked orders are basically agreed upon and work must be completed before GPA signs off on payments.
- GPA will not use the SPMO to conduct media, public information or

- administrative support. GPA has the capacity to do such work on its own.
- The SPMO will not affect GPA's internal management or engineering. GPA is fully capable of managing these functions on its own.

The SPMO that GPA is seeking here will provide the engineering services that are needed to accomplish the work for which grants were awarded to GPA. The work under these grants does not fall within the regular, everyday activities of GPA, which include line extensions for new customers, maintenance engineering, system planning and similar projects. Having an SPMO is therefore a prudent move for GPA and its stakeholders.

C. Procurement of the SPMO is necessary.

PUC Counsel concludes that the SPMO is unnecessary because GPA has sufficient avenues to bolster staffing in the Engineering and Technical Services Division. Thus, even if all 26 of GPA's retirement-eligible engineers and non-engineers leave GPA in the coming years, GPA can replenish its ranks through the University of Guam's fully accredited engineering program. As a result, PUC counsel concludes that GPA has no need to spend some \$10 million on the SPMO.

GPA's Response:

GPA engineering capacity has decreased substantially due to retirements, and the trend continues. *See* Exhibit A (Engineer Position Qualifications and Retirement Eligibility); *see also* Table 3 (listing the engineering disciplines of all GPA engineers). As of today, GPA has nine engineers who are eligible to retire immediately. Of the nine, three are supervisors and one is a manager. In other words, these are senior ranking employees. A majority of GPA's younger Level I, II, and III engineers will not be eligible to retire until after 2029.

A wide gap separates the senior employees eligible to retire immediately from those eligible to retire in or after 2029. As a consequence, GPA has many recently hired engineers who lack the institutional knowledge that will disappear with the retirement of the senior engineers. Although GPA actively recruits from the UoG program, it normally takes five to ten years for a

1 young engineer to grow into a seasoned professional.

2 GPA's new engineers are still in the process of growing into their positions. The recent
3 hires lack the requisite experience to take on the type of work that GPA contemplates performing
4 with the assistance of the SPMO. As described in GPA's petition, one of the core functions of the
5 SPMO will be to train and mentor GPA engineers:
6

- 7 • GPA recognizes the value in training our young engineers in the engineering,
8 design and construction management of our grant projects, concentrating on
9 substation construction, underground transmission and distribution lines. These
10 are the main projects GPA pursues in order to increase the system's reliability
11 during and recovery after storms.
- 12 • GPA also emphasizes the importance of developing standards and procedures
13 which document standards relevant to today and for bids in the future.
- 14 • GPA notes that cyber security is an evolving technology which requires
15 assistance from cyber consultants to protect the system. This expertise is
16 difficult to find and GPA needs to continue to train and retain employees.

17 Engineers freshly graduated from the UoG program are undoubtedly talented, but
18 nevertheless still raw. Moreover, many are civil engineers, whom GPA can train into becoming
19 electrical and mechanical engineers. Such transformation, however, requires time, effort, and
20 investment. GPA will need the services of the SPMO to develop its newly hired and existing staff.

21 Finally, with the KES Yona Solar Phase IV project underway and with the promise of more
22 Phase IV projects to come, as well as future Phase V projects, GPA must assign project managers
23 to these sites. This leaves GPA without in-house managers to handle the other projects listed in
24 Tables 1 and 2. The SPMO can supply the engineers that GPA needs. Thus, the SPMO is a
25 necessary project.
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Respectfully submitted this 27th day of March, 2025.

M. Wotoschuk

Marianne Woloschuk
GPA Legal Counsel

Table 1. Engineering and Other CIP Workload (Primarily Revenue Funded)

Section	Current Projects	Future Projects
Substation	T-501 Transformer Repair	T500 Refurbishment
	Piti T7 Transformer	Pulantat Sub Xfmr Refurbishment
	Network Communication - Fiber to All Substations	Mojave Marianas LLC 60 MVA Solar
	Substation and Transmission Improvements	CoreTech International 72 MW Solar
	System Protection Upgrade (115-kV and 34.5 kV Line Clearing Times Reduction)	KEPCO, EWP, and Samsung 144.29 MW Solar
	System Protection Upgrade (34.5 kV Line Clearing Times Reduction)	Power Solutions and SK (Site 1) 37.68 MW Solar
	SEL RTAC and Port Server	Power Solutions and SK (Site 2) 37.68 MW Solar
	Navy Polaris Point Substation	New BESS (4 ea - 45MVA) Project
	Navy Underground Transmission Lines	Piti Substation Grounding
	Navy Potts Junction Project	Tamuning T51 Transformer Repair
	Navy T11 and T12 Project	Northern Substation
	Navy Cold Storage Project	Piti-Harmon 115 kV Pole Repair
	Navy SATCOM Project	Malojloj-Umatat 34.5 kV Transmission Line
	Navy BESS	Mobile Substation
	DPW Bridges Project	Cabras-Agana 115 kV Line Pole Refurbishment
	Navy Missile Defense	Furan Analysis
	Navy LEOLABS	Apra Heights Substation - 115/34.5 kV Transformer Upgrade
	GTA Data Center	Hanwha ESS Ancillary Services
	Google Data Center	Automatic Generation Control (AGC)/Economic Dispatch (ED)/ PV Controller/ESS Controller
		Talofofo ESS (Upgrade)
		Yigo Substation Building Refurbishment
		Agana Substation - ESS Visual Disconnect Switch
		Dededo CT Remote Control System/Auto-Start
		Harmon-Dededo CT 34.5 kV UG Transmission Line
		New Malojloj – Agana 115-kV Transmission Line
		New Dandan Substation Improvements with 100 MVA 115/34.5 kV Transformer
		Tenjo Vista Remote Control System/Auto-Start
		KEPCO/LG ESS Ancillary Services
		Macheche/Yigo CT Remote Control System/Auto-Start
		Synchronous Condenser Modification of TEMES Combustion Turbine
		Synchronous Condenser Modification of Macheche CT
		Synchronous Condenser Modification of Yigo CT
		Macheche CT Control System Upgrade
		Yigo CT Control System Upgrade
		Marbo to Pagat 34.5 kV Line Upgrade
		Radio Barrigada to Pagat 34.5 kV Line Upgrade
		Agana to Radio Barrigada 34.5 kV Line Upgrade
Project Management	Unusable Wooden Power Pole Disposal	Upgrade Fire Protection System Manenggon Diesel
	Typhoon Mawar Permanent Repairs - Various Facilities	ULSD - Additional Connection to Backup Diesel Generator
	GPA Fadian Improvements - Various Departments	Substation Physical Security
	Facilities Physical Security - Substation Phase I	Inarajan Boat Ramp
	Electric Vehicle Additional Charging Stations - Fadian Site	Tank 1934 & 1935 Fire Protection System
	Tank 1934 & 1935 API Inspection (Recertification) and Refurbishment	T&D Master Plan (Transportation)
	New USLD Pipeline System (Navy Tie-In to Tank Farm/Power Plants/Diesel Engine Reserve Facility)	Piti Power Plant Smoke Stack Demolition
	GPWA Tumon Office Renovation (Design Only)	
	Typhoon Mangkhut Permanent Repairs (75% FEMA Funded)	
	Tenjo Vista Firewall and Transformer Relocation	
	Predictive Based Maintenance - Islandwide	
	Harmon Substation Concrete Fencing	
	ULSD - Components/Software for Remote Monitoring, Provisions for Meter Calibration, Quickflash Installation	
	Fadian Substation	
	New Transmission Lines (Fadian Substation)	
	Geotechnical Investigation Services	
	Disaster Recovery Office Building	
	T&D Master Plan (T&D Admin, Meter/Relay)	
	Cabras Power Plant Decommissioning	
	Gloria B. Nelson Building Physical Access Control System	

Table 1. Engineering and Other CIP Workload (Primarily Revenue Funded)

Distribution	P-087 GWA Wells Underground Conversion	PEC and LMS (Site 1) 5.503 MW Solar
	P-047 Metal Arm Refurbishment	PEC and LMS (Site 2) 5.503 MW Solar
	Underground Reconstruction Projects (20 Individual Project, Island-Wide)	PEC and LMS (Site 3) 5.503 MW Solar
	Line Recloser Project	PEC and LMS (Site 4) 5.503 MW Solar
	Automated Switching Capacitors	Power Solutions and SK (Site 3) 6.30 MW Solar
	Route 10A Road Improvements	Power Solutions and SK (Site 4) 6.3 MW Solar
	Road Hardening Route 1 to Route 3 Navy/DPW	P-111 Metal Arm Refurbishment
	8 Bridges Project	LED Streetlight Conversion and T&D Line Maintenance Support
	Missile Defense Agency South Fin	Tumon Bay Lateral Conversion (Remaining Laterals)
	Missile Defense Agency Radio Barrigada	P-090 underground extension to Battulo Street
	Navy Underground Transmission/Distribution Lines Piti-Sumay-Santa Rita	Voltage Regulator - North, Central, and South Installations
	CoreTech 300 Unit New Installation	Apra Substation Dist Feeder Upgrades
	Multiple Customer Applications	Pulantat Substation Upgrades
	System Planning / Power Quality	P-005 extension to Apra (Steel Arms)
		Kaiser Hybrid Conversion (San Antonio Avenue)
		Kaiser Hybrid Conversion (Chichirica, Sta Barbara, Amates)
		Liguan Terrace Hybrid Conversion - Phase I
		Liguan Terrace Hybrid Conversion - Phase II

Table 2. Grant Applications Submitted and Pending						
Awarding Agency	Grant	Project	Partner	Status	Total Project Cost	Cost Share
USDOE	Distributed Energy Systems Demonstrations Program	RENEW-GRID: Renewable Energy-based Resilient Distribution Grid	NREL PXiSE	Submitted	\$ 31,000,000.00	\$ 15,500,000.00
FEMA	Hazard Mitigation Grant Program	Underground Mitigation Programs		Submitted	\$ 262,204,618.00	\$ 26,220,461.80
USDOE	Solar and Wind Interconnection for Future Transmission (SWIFTR)	Tools to Accelerate IBR Performance and Conformity Assessment (TIP)	GPA NREL PXiSE Elevate Inverter OEM Mainland Utility	Concept Paper Submitted	\$ 2,400,000.00	\$ 400,000.00
USDOE	Critical Facility Energy Resilience (CiFER)	Development of a Resilient Energy System for a Critical Facility	NREL, PXiSE	Submitted	\$6,250,000	\$ 1,250,000.00
USDOE	Connected Communities 2.0	HERMES: Demonstration of Connected Underserved Communities via Harmonizing Energy Resources for Modern Electric Systems	NREL, PXiSE	Submitted	\$8,571,429	\$ 2,571,429.00
USDOE	Solar Technologies' Rapid Integration and Validation for Energy Systems (STRIVES)	PIONEER: Prosumer Incentive Plan and Dynamic Operating Envelope based Hierarchical Distribution Market for DERs	NREL, PXiSE	Submitted	\$ 4,051,763.00	\$ 1,051,763.00
FEMA	Public Assistance	Substation and Transmission			\$ 982,184,356.00	\$ 98,218,435.60
FEMA	Public Assistance	Distribution			\$ 787,361,183.00	\$ 78,736,118.30
FEMA	Public Assistance	Other Resiliency Projects			\$ 743,620,000.00	\$ 74,362,000.00
FEMA	Public Assistance	Conversion of All 13.8kV Feeders to Underground			\$ 4,500,000,000.00	\$ 450,000,000.00
TOTAL SUBMITTED - UNDER REVIEW					\$ 7,327,643,349.00	\$ 748,310,207.70

Engineer Series Position Qualifications

Engineer I

- A) Graduation from a recognized college or university with a Bachelor's degree in the field of engineering; or
- B) Possession of an Engineering-in-Training certificate from any state or territory of the United States; or
- C) One-year experience in the applicable field of engineering acquired under Professional engineering supervision and guidance, and graduation from a recognized college or university with an Associate's degree in engineering; or
- D) Graduation from a recognized college or university with a Bachelor's or higher degree in engineering technology, physics, architecture or closely related field.

Engineer II

- A) Two years of experience in the applicable field of engineering and graduation from a recognized college or university with a Bachelor's degree in the particular field of engineering; or
- B) Current registration as a Professional Engineer by any state or territory of the United States; or
- C) Two years of experience in the applicable field of engineering and possession of a current Engineer-in-Training (EIT) certificate from any state or territory of the United States; or
- D) Three years of progressively responsible experience in the applicable field of engineering acquired under professional engineering supervision and graduation from a recognized college or university with an Associate's degree in the particular field of engineering; or
- E) Two years of experience in the applicable field of engineering and graduation from a recognized college or university with a Bachelor's or higher degree in engineering technology, physics, architecture or closely related field.

Engineer Series Position Qualifications

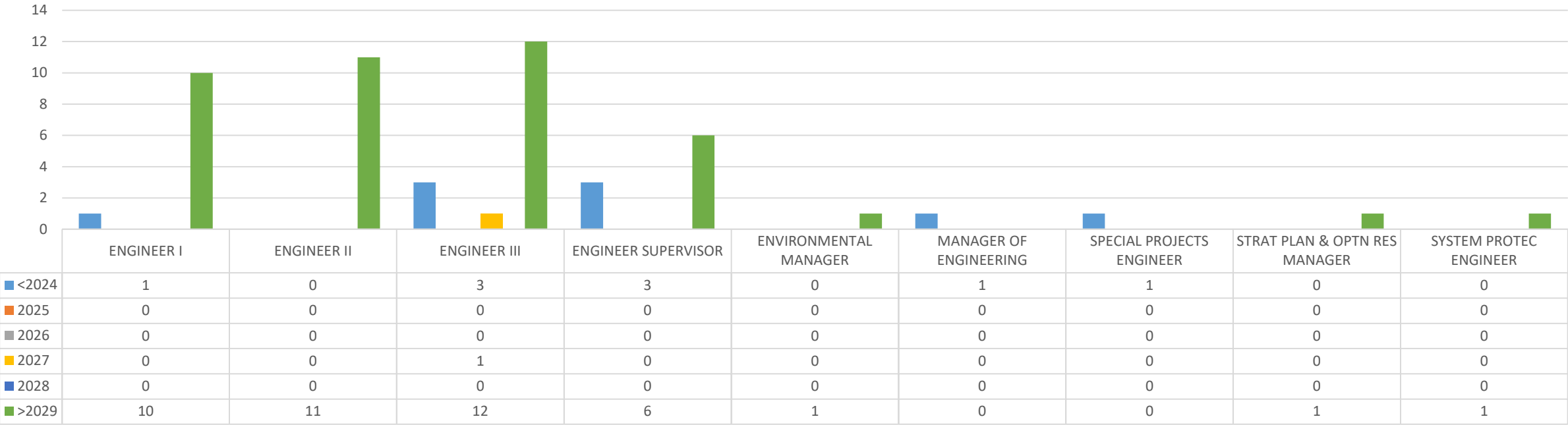
Engineer III

- A) There (3) years of progressively responsible specialized experience in the applicable field of engineering and graduation from a recognized college or university with a Bachelor's degree in the particular engineering field; or
- B) One (1) year of specialized experience in the applicable field of engineering and current registration as a Professional Engineer by any state or territory of the United States; or
- C) Three (3) years of progressively responsible specialized experience in the applicable field of engineering and possession of a current Engineer-in-Training (EIT) certificate from any state or territory of the United States; or
- D) Four (4) years of progressively responsible specialized experience in the applicable field of engineering and graduation from a recognized college or university with an Associate's degree in engineering; or
- E) Three (3) years of specialized experience in the applicable field of engineering and graduation from a recognized college or university with a Bachelor's or higher degree in engineering technology, physics, architecture or closely related field.

Engineer Supervisor

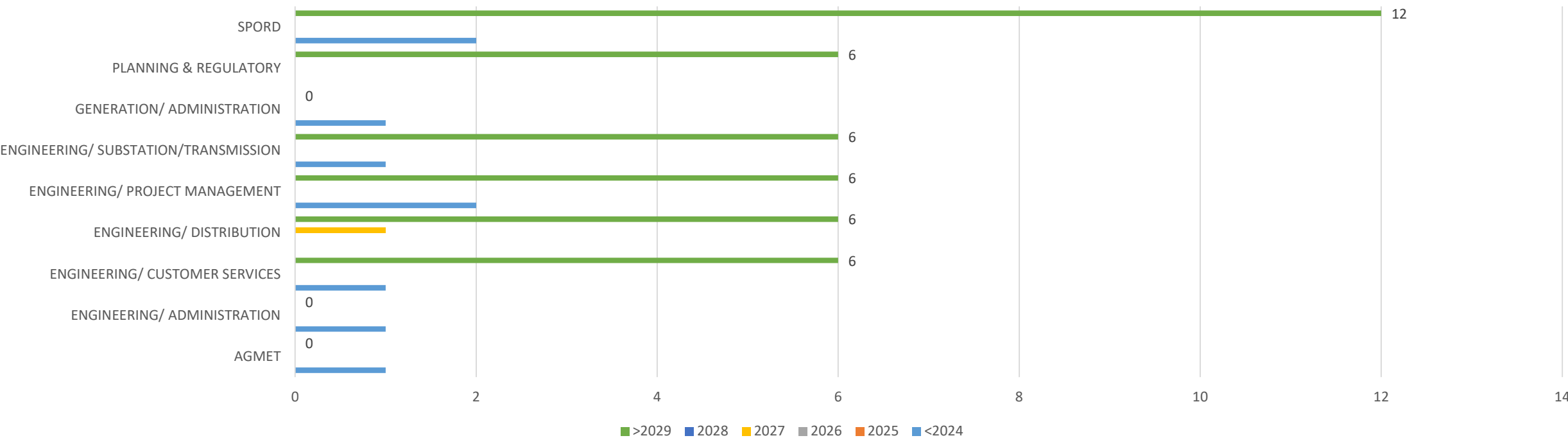
- A) Four (4) years of progressively responsible specialized experience in the applicable field of engineering, one (1) year of supervisory experience and graduation from a recognized college or university with a Bachelor's degree in the particular engineering field; or
- B) Two (2) years of progressively responsible specialized experience in the applicable field of engineering, one (1) year of supervisory experience, and current registration as a Professional Engineer by any state or territory of the United States; or
- C) Four (4) years of progressively responsible specialized experience in the applicable field of engineering, one (1) year of supervisory experience and possession of a current Engineer-in- Training (EIT) certificate from any state or territory of the United States; or
- D) Five (5) years of progressively responsible specialized experience in the applicable field of engineering, one (1) year of supervisory experience, and graduation from a recognized college or university with an Associate's degree in engineering; or
- E) Four (4) years of progressively responsible experience in the applicable field of engineering, one (1) year of supervisory experience, and graduation from a recognized college or university with a Bachelor's or higher degree in engineering technology, physics, architecture or closely related field.

Engineer Retirement Eligibility by Position



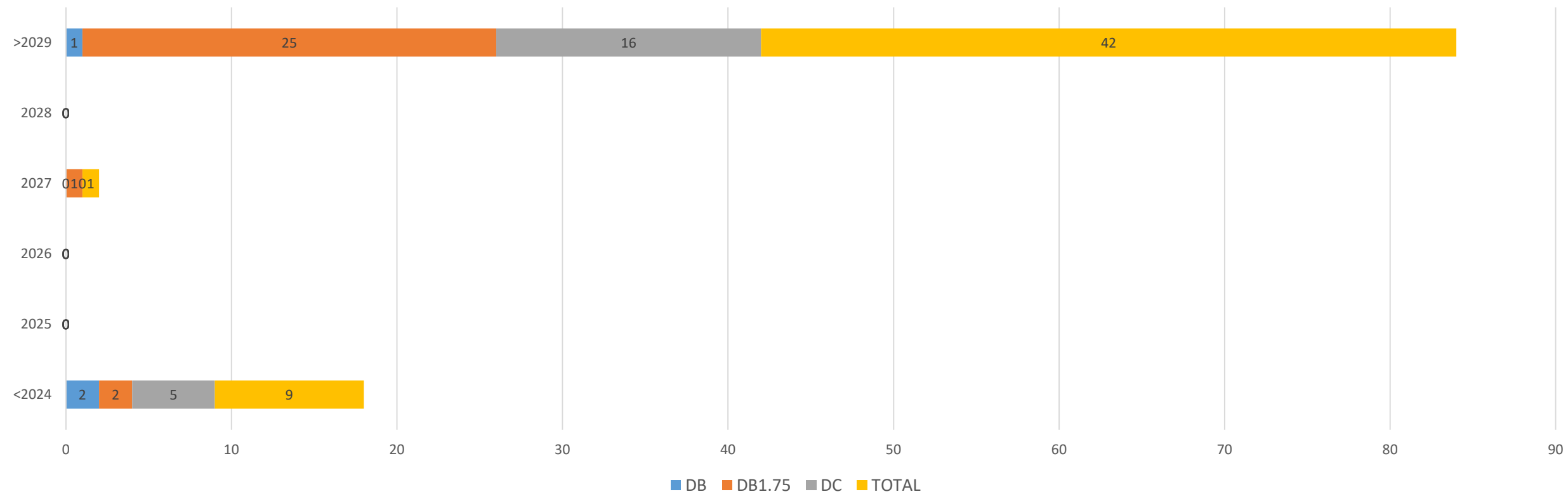
Position	<2024	2025	2026	2027	2028	>2029
ENGINEER I	1	0	0	0	0	10
ENGINEER II	0	0	0	0	0	11
ENGINEER III	3	0	0	1	0	12
ENGINEER SUPERVISOR	3	0	0	0	0	6
ENVIRONMENTAL MANAGER	0	0	0	0	0	1
MANAGER OF ENGINEERING	1	0	0	0	0	0
SPECIAL PROJECTS ENGINEER	1	0	0	0	0	0
STRAT PLAN & OPTN RES MANAGER	0	0	0	0	0	1
SYSTEM PROTEC ENGINEER	0	0	0	0	0	1
TOTAL	9	0	0	1	0	42

Engineer Retirement Eligibility by Division/Section



Position	<2024	2025	2026	2027	2028	>2029	TOTAL
AGMET	1	0	0	0	0	0	1
ENGINEERING/ ADMINISTRATION	1	0	0	0	0	0	1
ENGINEERING/ CUSTOMER SERVICES	1	0	0	0	0	6	7
ENGINEERING/ DISTRIBUTION	0	0	0	1	0	6	7
ENGINEERING/ PROJECT MANAGEMENT	2	0	0	0	0	6	8
ENGINEERING/ SUBSTATION/TRANSMISSION	1	0	0	0	0	6	7
GENERATION/ ADMINISTRATION	1	0	0	0	0	0	1
PLANNING & REGULATORY	0	0	0	0	0	6	6
SPORD	2	0	0	0	0	12	14
TOTAL	9	0	0	1	0	42	52

Engineer Retirement Eligibility by Plan Type



CY	DB	DB1.75	DC	TOTAL
<2024	2	2	5	9
2025	0	0	0	0
2026	0	0	0	0
2027	0	1	0	1
2028	0	0	0	0
>2029	1	25	16	42
TOTAL	3	28	21	52

Table 3. Retirement Eligibility (Engineers)
as of 03/23/2025

Trigger date 3/25/2025

	TITLE	DIV	SECT	DIV/SEC	DISCIPLINE	P.E. or E.I.T.	RET. PLAN	START DATE	ELIGIBILITY REQ. (AGE OR SERVICE)	ELIGIBILITY DATE	Years to retire
1	ENGINEER SUPERVISOR	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Mechanical	P.E.	DB	09/12/1993	30	09/12/2023	Eligible
2	MANAGER OF ENGINEERING	ENGINEERING	Administration	ENGINEERING/ ADMINISTRATION	Electrical	P.E.	DB	08/09/1992	30	08/09/2022	Eligible
3	ENGINEER SUPERVISOR	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Electronics	x	DB1.75	05/31/1989	62	01/14/2020	Eligible
4	ENGINEER SUPERVISOR	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Chemical	x	DB1.75	10/06/1997	62	11/09/2021	Eligible
5	ENGINEER I	ENGINEERING	Substation/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	x	DC	04/25/2022	55	12/24/2020	Eligible
6	ENGINEER III	ASSISTANT GENERAL MANAGER - ENGINEERING & TECHNICAL SERVICES	AGMET	AGMET	Electrical	x	DC	02/06/2023	55	12/11/2009	Eligible
7	ENGINEER III	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Electrical	x	DC	01/18/2022	55	09/10/2015	Eligible
8	ENGINEER III	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Mechanical	x	DC	03/15/2021	55	02/08/2003	Eligible
16	SPECIAL PROJECTS ENGINEER	GENERATION	Administration	Generation/ Administration	Marine	x	DC	11/01/2010	55	7/4/2019	Eligible
9	ENGINEER III	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Electrical	x	DB1.75	04/03/2006	62	4/22/2027	2
10	ENGINEER SUPERVISOR	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DB1.75	12/21/2009	62	8/19/2029	4
11	SYSTEM PROTEC ENGINEER	ENGINEERING	Substation/Trans	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	x	DB1.75	05/02/2005	62	2/16/2029	4
12	STRAT PLAN & OPTN RES MANAGER	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	P.E.	DB	04/09/2012	30	08/11/2030	5
13	ENVIRONMENTAL MANAGER	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Electrical	x	DB1.75	07/29/2024	62	12/17/2029	5
14	ENGINEER III	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Mathematics	x	DB1.75	09/25/2006	62	1/12/2031	6
15	ENGINEER SUPERVISOR	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	x	DB1.75	01/24/1993	62	5/7/2031	6
17	ENGINEER III	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Mathematics	x	DB1.75	01/23/1995	62	8/3/2032	7
18	ENGINEER SUPERVISOR	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Electrical	x	DB1.75	01/16/2003	62	7/21/2032	7
19	ENGINEER III	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Civil	x	DB1.75	09/30/1996	62	12/23/2032	8
20	ENGINEER SUPERVISOR	ENGINEERING	Substation/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	P.E.	DB1.75	09/23/1996	62	8/24/2033	8
21	ENGINEER II	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electronics	x	DC	10/31/2022	55	10/9/2033	9
22	ENGINEER SUPERVISOR	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	P.E.	DB1.75	09/30/1996	62	2/25/2035	10
23	ENGINEER III	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Industrial	x	DB1.75	05/24/2004	62	3/16/2037	12
24	ENGINEER II	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DC	11/18/2013	55	7/8/2037	12
25	ENGINEER I	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	x	DC	07/29/2024	55	5/12/2039	14
26	ENGINEER III	ENGINEERING	Substation/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	x	DB1.75	05/23/2011	62	5/17/2041	16

Table 3. Retirement Eligibility (Engineers)
as of 03/23/2025

Trigger date 3/25/2025

	TITLE	DIV	SECT	DIV/SEC	DISCIPLINE	P.E. or E.I.T.	RET. PLAN	START DATE	ELIGIBILITY REQ. (AGE OR SERVICE)	ELIGIBILITY DATE	Years to retire
27	ENGINEER SUPERVISOR	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Electrical	P.E.	DB1.75	06/22/2009	62	7/5/2041	16
28	ENGINEER I	ENGINEERING	Substation/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	x	DC	11/27/2023	55	3/31/2041	16
29	ENGINEER III	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Electrical	E.I.T.	DB1.75	10/20/2003	62	8/5/2042	17
30	ENGINEER II	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Civil	x	DC	03/14/2022	55	1/9/2042	17
31	ENGINEER II	ENGINEERING	Substaiton/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	x	DC	12/10/2018	55	4/23/2042	17
32	ENGINEER III	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Electrical	x	DB1.75	05/01/2017	62	3/26/2044	19
33	ENGINEER II	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Electrical	x	DC	01/03/2019	55	2/28/2044	19
34	ENGINEER III	ENGINEERING	Substation/Transmission	ENGINEERING/ SUBSTATION/TRANSMISSION	Electrical	P.E.	DB1.75	05/23/2011	62	11/18/2049	25
35	ENGINEER III	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DB1.75	04/29/2013	62	2/15/2051	26
36	ENGINEER I	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Electrical	E.I.T.	DC	11/07/2022	55	7/28/2052	27
37	ENGINEER I	ENGINEERING	Distribution	ENGINEERING/ DISTRIBUTION	Enviornmental	x	DC	12/18/2023	55	8/4/2052	27
38	ENGINEER III	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Mechanical	x	DB1.75	10/08/2013	62	3/8/2053	28
39	ENGINEER III	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Mechanical	x	DB1.75	01/23/2023	62	4/13/2053	28
40	ENGINEER III	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	x	DB1.75	09/21/2015	62	8/16/2053	28
41	ENGINEER I	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DC	11/07/2022	55	11/23/2053	29
42	ENGINEER I	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DC	07/01/2024	55	6/9/2054	29
43	ENGINEER II	ENGINEERING	Project Management	ENGINEERING/ PROJECT MANAGEMENT	Civil	x	DC	03/08/2022	55	5/21/2054	29
44	ENGINEER I	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Civil	E.I.T.	DC	10/31/2022	55	10/19/2053	29
45	ENGINEER I	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Civil	E.I.T.	DC	10/24/2022	55	10/23/2053	29
46	ENGINEER I	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Mathematics	x	DC	11/20/2023	55	1/20/2055	30
47	ENGINEER I	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Patroleum	x	DC	10/24/2022	55	8/16/2055	30
48	ENGINEER II	PLANING & REGULATORY	Planning & Regulatory	PLANNING & REGULATORY	Civil	E.I.T.	DB1.75	10/16/2017	62	9/9/2057	32
49	ENGINEER II	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Mathematics	x	DB1.75	10/18/2021	62	11/2/2056	32
50	ENGINEER II	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Electrical	x	DB1.75	01/18/2022	62	8/29/2059	34
51	ENGINEER II	ENGINEERING	Customer Services	ENGINEERING/ CUSTOMER SERVICES	Electrical	E.I.T.	DB1.75	04/18/2022	62	2/24/2060	35
52	ENGINEER II	STRATEGIC PLANNING & OPERATIONS RESEARCH	SPORD	SPORD	Civil	x	DB1.75	03/03/2022	62	2/21/2061	36

Table 3. Retirement Eligibility (Engineers)
as of 03/23/2025

Trigger date 3/25/2025

	TITLE	DIV	SECT	DIV/SEC	DISCIPLINE	P.E. or E.I.T.	RET. PLAN	START DATE	ELIGIBILITY REQ. (AGE OR SERVICE)	ELIGIBILITY DATE	Years to retire
54	ENGINEERING TECHNICIAN I	ENGINEERING	Substation/Trans	ENGINEERING/ SUBSTATION/TRANSMISSION		x	DB1.75	01/17/2014	62	7/12/2056	31
55	ENGINEERING TECHNICIAN II	ENGINEERING	Customer Service	ENGINEERING/ CUSTOMER SERVICES		x	DB1.75	06/05/2018	62	9/18/2051	26
56	ENGINEERING TECHNICIAN II	ENGINEERING	Real Estate	ENGINEERING/ REAL ESTATE		x	DC	06/03/2024	55	5/28/2027	2
57	ENGINEERING TECHNICIAN II	ENGINEERING	Customer Service	ENGINEERING/ CUSTOMER SERVICES		x	DB1.75	12/24/2018	62	2/15/2048	23
58	ENGINEERING TECHNICIAN II	ENGINEERING	Customer Service	ENGINEERING/ CUSTOMER SERVICES		x	DB1.75	12/18/2017	62	2/2/2054	29
59	ENGINEERING TECHNICIAN II	ENGINEERING	Customer Service	ENGINEERING/ CUSTOMER SERVICES		x	DC	03/14/2022	55	6/4/2031	6