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November 14, 2011

Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street,  
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Request for Intervenor Status, Eligibility for an Award of Costs and  
Approval of Expert Witness  
Renewed Regulatory Framework for Electricity  
Board File Numbers: EB-2010-0377, EB-2010-0378, EB-2010-0379, EB-2011-  
0043 and EB-2011-0004**

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Willms & Shier Environmental Lawyers LLP (Willms & Shier) is legal counsel to Northwatch.

Northwatch is a public interest organization concerned with environmental protection and social development in northeastern Ontario. Founded in 1988 to provide a representative regional voice in environmental decision-making and to address regional concerns with respect to energy, waste, mining and forestry related activities and initiatives, Northwatch has a long-term and consistent interest in electricity planning in Ontario. In particular, Northwatch's interests are with respect to electricity generation and transmission in northeastern Ontario, conservation and efficiency measures, and rates and rate structures. Northwatch is a coalition of community and district based environmental, social justice and social development organizations.

The purpose of this letter is to identify Northwatch's interest in the renewed regulatory framework for electricity and to seek intervenor status, eligibility for any award of costs and approval for an expert witness.

Northwatch's contact is Ms. Brennain Lloyd, coordinator for Northwatch. Ms. Lloyd's contact information is as follows:



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## **HOW NORTHWATCH IS OR MAY BE AFFECTED BY THE RENEWED REGULATORY FRAMEWORK FOR ELECTRICITY CONSULTATION PROCESS**

Northwatch seeks to participate as an intervenor in the renewed regulatory framework for electricity consultation process. Northwatch's interest is in all of the initiatives in the proposed framework and wishes to intervene in all of them. However, Northwatch is particularly interested in the issues raised in this proceeding as they relate to regional planning of electricity infrastructure (EB-2011-0043).

The residents and regions of northeastern Ontario will or may be affected by the renewed regulatory framework for electricity consultation process in as far as it relates to:

- how the electricity framework may evolve in support of and/or counter to Northwatch's interests and objectives, and
- whether and/or how demand and supply of electricity will be balanced at a regional level.

## **DESCRIPTION OF NORTHWATCH**

As indicated above, Northwatch was founded in 1988 as a regional coalition of individuals and organizations concerned with the protection of the environment and with social equity. Northwatch has a diverse membership which includes local and district-



based environmental groups, cottagers associations, naturalist clubs, church-based Aboriginal support groups, women's organizations, and local peace groups.

Individual members include those who self-identify as professionals, trappers, tourist outfitters, paddlers, parents, educators, conservationists, hunters and fishers, and environmentalists. The common thread throughout Northwatch's membership is a deep commitment to the region of northeastern Ontario and to the health, well-being and sustainability of the human and natural communities throughout the region.

Northwatch's membership base and area of interest is the land mass north of the French River, comprised of the districts of Nipissing, Sudbury, Algoma, Manitoulin, Cochrane and Timiskaming, and including the land area north of the road system, generally known as the Hudson's Bay lowlands.

Northwatch is well respected for its policy and research work, public education programs, and its holistic approach to environmental and social planning and decision-making. Through a membership that is geographically dispersed throughout the region and through more than twenty years of work that is regionally based, Northwatch has an extensive knowledge of northeastern Ontario and the diverse and interconnecting issues of energy, natural resource and environmental management.

Northwatch has a history of involvement in energy policy. Recently, Northwatch has actively participated as an intervenor and has been found eligible for an award of costs in the following OEB proceedings:

- The Integrated Power System Plan (IPSP)
- The Transmission Connection Cost Responsibility Review (EB-2008-0003)
- Proposed Amendments to the Distribution System Code (EB-2009-0077)
- The Regulatory Treatment of Infrastructure Investment for Ontario's Electricity Transmitters & Distribution (EB-2009-0152).

Northwatch has most recently engaged with the Ontario Power Authority (OPA) on the current IPSP and provided input to the OPA on the need for regional electricity planning in Ontario, particularly in the northeast region.

## **NATURE AND SCOPE OF NORTHWATCH'S INTENDED PARTICIPATION**

The nature and scope of Northwatch's participation will be that of an intervenor and will include the following contributions to the review process:

- participation in the December 8, 2011 Information Session



- participation in the February, 2012 Stakeholder Conference
- written submissions on the issues identified at the Stakeholder Conference
- retaining of an expert, Mr. Bill Marcus, of JBS Energy Inc. to review one or more of the Board Staff discussion papers and the three expert papers and provide an opinion based on the review.

JBS Energy is a consulting firm specializing in regulatory economics for energy consumers and producers.

William B. Marcus is Principal Economist of JBS Energy, Inc. He has 33 years of experience in analyzing electric and gas utilities. He has reviewed issues related to utility resource planning, cost-effectiveness of energy projects, design of energy efficiency programs, performance-based ratemaking, revenue requirements, rate of return, and cost allocation and rate design for a variety of consumer, environmental, and independent power clients. He has testified as an expert witness before approximately 40 regulatory bodies and courts in North America. Mr. Marcus received his undergraduate degree in economics from Harvard College and an M.A in economics from the University of Toronto. Before becoming a founding member of JBS in 1984, he worked for the Kennedy School of Government at Harvard and for the California Energy Commission. He has previously preparing a detailed analysis of the Demand-Supply Plan of Ontario Hydro filed before the Environmental Assessment Board in 1992 and has appeared before the OEB on Gas Integrated Resource Planning and several cases involving Ontario Hydro and various gas utilities.

Mr Marcus' CV is attached. He can be contact at: JBS Energy Inc, 311 D Street West, Sacramento CA 95605. Tel (916) 372 0534. Email: bill@jbsenergy.com

## **GROUND'S FOR NORTHWATCH ELIGIBILITY FOR COSTS**

Northwatch intends to seek costs from the applicant in relation to its participation in this review. The Ontario Energy Board's "Practice Direction on Cost Awards". Section 3 describes cost eligibility, and Section 4 describes the cost eligibility process.

*3.03 A party in a Board process is eligible to apply for a cost award where the party:*

*(a) primarily represents the direct interests of consumers (e.g. ratepayers) in relation regulated services; (b) primarily represents a public interest relevant to the Board's mandate; or (c) is a person with an interest in land that is affected by the process.*



Northwatch meets all three of the eligibility criteria, but as a public interest organization, its primary purpose - and its primary contribution to the stakeholder review process - is with respect to (b).

Northwatch's primary purpose is to represent the public interest with respect to environmental protection and resource management matters in northeastern Ontario. However, as a coalition of interests which includes those represented by social organizations, Northwatch also has an interest and a relevant perspective with respect to consumer concerns, many of which are unique in northeastern Ontario, relative to a provincial or more urban context (ie. criteria a).

Northwatch represents the interests of the environment and of the residents of northeastern Ontario who identify and express environmental concerns; it is within the mandate of the Ontario Energy Board to consider such matters as the effect on the environment (ie. criteria b). Further, our members have an interest in the land that is or may be affected by the process (ie. criteria c). That interest may in some cases be a private interest, but in every case is also a public interest.

Northwatch will make a responsible, unique and beneficial contribution to the renewed regulatory framework for electricity proceeding.

As a not-for-profit organization, Northwatch's participation in this proceeding is dependent on any cost awards it receives.

## **CO-OPERATION WITH OTHER GROUPS**

Northwatch understands the importance of avoiding duplication of effort and any unnecessary differences of opinion on issues of mutual concern to other intervenors. Northwatch will work with the other intervenors to avoid repetition. Northwatch understands that a responsible intervention will add value and is deserving of costs.

Northwatch communicates regularly with other stakeholder groups on electricity related matters. As a coalition with a diverse network of members and associates, Northwatch's experience and perspective is unique to northeastern Ontario, and as such would not be served by joining with other groups for this exercise. However, Northwatch will continue to communicate with other stakeholders and combine efforts where possible in order to bring efficiencies to the Ontario Energy Board's renewed regulatory framework for electricity proceeding.

Contacts for the distribution list are as follows:

- ♦ Brennain Lloyd, coordinator for Northwatch, e-mail: [northwatch@onlink.net](mailto:northwatch@onlink.net)
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- ♦ Matt Gardner, Counsel, Willms & Shier Environmental Lawyers, e-mail: [mgardner@willmsshier.com](mailto:mgardner@willmsshier.com)

Thank you for your consideration. We look forward to a positive response to this expression of interest and to participating in the renewed regulatory framework for electricity proceeding.

Yours truly,

Juli Abouchar

*Partner, W+SEL*

*Certified as a Specialist in Environmental Law  
by the Law Society of Upper Canada*

cc: Brennain Lloyd, Northwatch  
Document #: 474790

**William B. Marcus**

Principal Economist,  
JBS Energy, Inc.

William B. Marcus has 32 years of experience in analyzing electric and gas utilities.

Mr. Marcus graduated from Harvard College with an A.B. magna cum laude in economics in 1974 and was elected to Phi Beta Kappa. In 1975, he received an M.A. in economics from the University of Toronto.

In July, 1984, Mr. Marcus became Principal Economist for JBS Energy, Inc. In this position, he is the company's lead economist for utility issues.

Mr. Marcus is the co-author of a book on electric restructuring prepared for the National Association of Regulatory Utility Commissioners. He wrote a major report on Performance Based Ratemaking for the Energy Foundation.

Mr. Marcus has prepared testimony and formal comments submitted to the Federal Energy Regulatory Commission, the National Energy Board of Canada, the Bonneville Power Administration, the U.S. Bureau of Indian Affairs, U.S. District Court in San Diego, Nevada County Municipal Court; committees of the Nevada, Ontario and California legislatures and the Los Angeles City Council; the California Energy Commission (CEC), the Sacramento Municipal Utility District (SMUD), the Transmission Agency of Northern California, the State of Nevada's Colorado River Commission, a hearing panel of the Alberta Beverage Container Management Board; two arbitration cases, environmental boards in Ontario, Manitoba, and Nova Scotia; and regulatory commissions in Alberta, Arizona, Arkansas, British Columbia, California, Colorado, Connecticut, District of Columbia, Hawaii, Iowa, Manitoba, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New Mexico, North Carolina, Northwest Territories, Nova Scotia, Ohio, Oklahoma, Ontario, Oregon, South Carolina, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, and Yukon. He testified on issues including utility restructuring, stranded costs, Performance-Based Ratemaking, resource planning, load forecasts, need for powerplants and transmission lines, environmental effects of electricity production, evaluation of conservation potential and programs, utility affiliate transactions, mergers, utility revenue requirements, avoided cost, and electric and gas cost of service and rate design.

From 1975 to 1978, Mr. Marcus was a research analyst at the Kennedy School of Government, Harvard University. He prepared public policy case studies on environmental and transportation issues, benefit-cost analysis, and urban policy and finance for use in classes and publication in the Kennedy School Case Series.

From July, 1978 through April, 1982, Mr. Marcus was an economist at the CEC, first in the energy development division and later as a senior economist in the CEC's Executive Office. He prepared testimony on purchased power pricing and economic studies of transmission projects, renewable resources, and conservation programs, and managed interventions in utility rate cases.

From April, 1982, through June, 1984, he was principal economist at California Hydro Systems, Inc., an alternative energy consulting and development company. He prepared

financial analyses of projects, negotiated utility contracts, and provided consulting services on utility economics.

Mr. Marcus is currently the Chair of the Manufactured Home Fair Practices Commission for the City of Woodland, California. This Commission regulates space rents in the City's mobile home parks. He has served on several other local government advisory committees, including a 1991-92 SMUD Rate Advisory Committee, which recommended cost allocation and rate design changes to the SMUD Board.



## PUBLICATIONS

W. Marcus and C. Mitchell, "Critical Thinking on California IOU Energy Efficiency Performance Incentives from a Consumer Advocate's Perspective," Proceedings of 2006 ACEEE Summer Study on Energy Efficiency in Buildings, Panel 5, August 18, 2006.

W. Marcus, "Is There Life for Wind Power After Restructuring?" Proceedings of the Canadian Wind Energy Association 1996 Conference.

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W. Marcus. "More on the Effects of CWIP in the Rate Base." Public Utilities Fortnightly, 119, January 8, 1987.

W. Marcus and N. Floyd. "The Regulatory Factor In Wind Power Contract Development." Paper presented to the American Society of Mechanical Engineers Second Wind Energy Symposium. Houston, Texas, January, 1983.

C. Praul, W. Marcus, and R. Weisenmiller. "Delivering Energy Services: New Challenges for Utilities and Regulators." Annual Review of Energy, 1982, 7:371-415.

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C. Praul and W. Marcus. "Achieving Energy Efficiency in Existing Buildings." CEC Staff Report P110-80-003. July 1980.

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R. Weisenmiller, K. Wilcox, W. Marcus. Comparative Evaluation of Non-Traditional Energy Resources. CEC Staff Report P500-80-006. February 1980.

Author or co-author of eight cases published by the Kennedy School of Government, Harvard University, and the Inter-University Case Clearinghouse.

## **OTHER REPORTS AND PRESENTATIONS**

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W. Marcus, **Residential Electric Rate Design and Energy Efficiency**, Presentation to National Regulatory Research Institute Rate Design Teleseminar, February 11, 2010.

W. Marcus. **Review of the Business Plan for the Marin County Community Choice Aggregation Program**. February 2008 and **Review of PG&E's March 5 2008 Comments on the Business Plan for the Marin County Community Choice Aggregation Program**. April 2008. Reports prepared for The County of Marin.

W. Marcus and G. Ruzsovan, **Know Your Customers: A Review of Load Research Data and Economic, Demographic, and Appliance Saturation Characteristics of California Utility Residential Customers**. Attachment to Formal Comment Filed in CPUC App. 06-03-005 Dynamic Pricing Phase for The Utility Reform Network. December 2007.

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W. Marcus and E. Richlin, **Clean and Affordable Power: How Los Angeles Can Reach 20% Renewables Without Raising Rates**. For Environment California. March 2003.

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W. Marcus, G. Schilberg, G. Ruzsovan, and K. Hanson, **Analysis of Cost-Effective Nitrogen Oxide Control Scenarios on Five Southern California Utilities: Annual and Peak Day Generation.** Prepared for the South Coast Air Quality Management District. March 1991.

W. Marcus and J. Nahigian, **Economic Evaluation of the Quadrex Proposal to Acquire the Rancho Seco Nuclear Plant and Sell Power to the Sacramento Municipal Utility District.** Prepared for SMUD Director Edward Smeloff. August 1989.

W. Marcus, **Evaluation of the Avoided Costs of the Nova Scotia Power Corporation.** Prepared for the Nova Scotia Power Corporation and the Small Power Producers Association of Nova Scotia. March 1989.

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Arkansas PSC Docket 10-052-U. Revenue Requirement, Cost of Service and Residential Rate Design for Empire District Electric Company (Empire). December 2010. For the Arkansas AG (case settled).

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Arkansas PSC Docket 08-103-U. Revenue Requirement, Cost of Service, and Residential Rate Design for OG&E. January 2009. For the Arkansas AG. (case settled)

CPUC App. 08-02-001 Phase 2. Cost of Service and Revenue Allocation for Southern California Gas Company (SoCal Gas). December 2008. For TURN. (case settled)

AUC Application No. 1578371. Management Fee for Contributions in Aid of Construction for Atco Electric Company. . December 2008. For CCA and PICA.

Arkansas PSC Docket 08-139-U Phase IIB. Extraordinary Storm Damage Recovery Request of EAI. November 2007. For the Arkansas AG.

PUCT Docket 35717. Cost of Service and Rate Design for Oncor Delivery Services, Inc. For Texas OPUC. October 2008.

CPUC App. 08-03-002. Cost of Service and Class Revenue Allocation for SCE. October 2008. For TURN. (case settled)

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PUCT Docket 35668. Interruptible Rates and Air Conditioner and Water Heater Cycling Programs of SPS. For Texas OPUC. September 2008. (case settled)

Colorado PUC, Docket 08S-146G. Cost Allocation and Rate Design for Public Service Company of Colorado's Gas Operations. For Energy Outreach Colorado. July 2008.

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Northwest Territories Public Utilities Board (PUB). Business Risk and Capital Structure for Northland Utilities Limited. April 2008. For the City of Yellowknife and the Town of Hay River.

CPUC App. 07-11-012. Revenue Requirement Issues for SCE. April 2008. For TURN.

PUCN Docket 07-12005. Marginal Cost and Rate Design of Sierra. April 2008. For Nevada BCP.

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Arkansas PSC Docket 07-129-U. Annual Earnings Review Tariff for EAI. October 2007. For the Arkansas AG.

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Arkansas PSC Docket 06-161-U. Revenue Requirement and Cost of Service for Centerpoint Arkla. July 2007. For the Arkansas AG. (case settled)

CPUC App. 06-12-009/010. Revenue Requirements Issues for SoCal Gas and SDG&E. July 2007. For TURN (SoCal Gas) and UCAN (SDG&E). (SoCal Gas portion of case settled)

Maryland PSC Case No. 9104. Cost of Service, Revenue Allocation, and Service Quality issues for Washington Gas Light Company (WGL). July 2007. For Maryland Office of People's Counsel (OPC).

CPUC Rulemaking 06-04-010. Inappropriateness of Avoided Supply-Side Equity Returns as the Basis for Energy Efficiency Incentives. May 2007. For TURN.

Alberta EUB. Application 1492697. Return Margin for Regulated Retail Gas Service provided by Direct Energy Regulated Services. April 2007. For the Alberta UCA.

Alberta Beverage Control Management Board Hearing Review Panel. Return Margin for Bottle Recycling Depots. For Canada's National Brewers. March 2007.

Arkansas PSC Docket 06-124-U. Revenue Requirement and Cost of Service, for Arkansas Western Gas Company (AWG). February 2007. For the Arkansas AG (case settled).

Arkansas PSC Docket 06-101-U. Revenue Requirement, Cost of Service, and Residential Rate Design for EAI. February 2007. For the Arkansas AG.

Alberta EUB. Application 1468565. Policy Testimony Regarding the Establishment of a Uniform System of Accounts for Alberta Electric Utilities. November 2006. For the Alberta Federation of REAs Ltd and Alberta Association of Municipal Districts and Counties (REA/AAMDC), CCA, and PICA.

CPUC App. 06-03-005. Marginal Cost and Class Revenue Allocation for PG&E. October. 2006. For TURN (case settled).

PUCN. Docket 06-06007. Special Contract to Extend Service from Nevada Power to MGM Mirage Project. October 2006. For Nevada BCP.

Arkansas PSC Docket 06-070-U. Revenue Requirement, Cost of Service, and Residential Rate Design for OG&E. October 2006. For the Arkansas AG. (case settled)

CPUC App. 05-03-015. Value of Demand Response and Policy Issues Associated with SDG&E's Proposed Automatic Metering Infrastructure Program. August 2006. For UCAN.

CPUC App. 06-04-012. Ratemaking and Performance Requirements for Two Proposed New PG&E Powerplants. August 2006. For TURN.

(PUCN Docket 06-05007. Inquiry on Electric Marginal Cost Methods. July and October 2006. For Nevada BCP (formal comments).

Alberta EUB. Applications 1455025 and 1457764. Return Margin for Regulated Retail Electric Service provided by Direct Energy Regulated Services and Enmax Energy Services. July 2006. For Alberta UCA and several other organizations representing Alberta consumers.

CPUC App. 05-12-005. Revenue Requirements for PG&E's Electric Generation and Electric and Gas Distribution Activities. April. 2006. For TURN.

Alberta EUB. Application 1434992. Allocation of Transmission Costs of Fortis Alberta, Inc. to Customer Classes. April 2006. For REA/AAMDC.

Arkansas PSC Docket 06-028-R. Principles for Integrated Resource Planning. April 2006. For the Arkansas AG. (formal opening and reply comments, prepared jointly with C.K. Mitchell)

PUCN. Docket 05-10003/10005. Electric and Gas Cost of Service and Residential Rate Design for Sierra. February 2006. For Nevada BCP.

CPUC App. 05-05-023. Marginal Cost and Revenue Allocation of SCE. January 2006. For TURN. (case settled)

CPUC App. 05-06-028. Value of Demand Response in PG&E's Advanced Metering Infrastructure (AMI) Program. January 2006. For TURN.

CPUC App. 05-06-028. Impact of Pending Municipal Annexation Proposal in Yolo County on PG&E's AMI Program. January 2006 (deployment) and June 2005 (pre-deployment). For Yolo County and cities of Davis, West Sacramento, and Woodland.

CPUC App. 05-06-018. Revenue Requirements, Marginal Cost, Revenue Allocation, and Residential Rate Design for Sierra's California Operations. November-December 2005. For TURN (two separate pieces of testimony; case settled)

Arkansas PSC Docket 05-111-P. AWG's Proposed Weatherization Program. November 2005. For the Arkansas AG.

CPUC Rulemakings 04-04-025 and 04-04-003. Avoided Cost Policy for Qualifying Facilities. September 2005. For TURN.

Arkansas PSC Docket 05-006-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AOG. August 2005. For the Arkansas AG.

Arkansas PSC Docket 04-176-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AWG. July 2005. For the Arkansas AG.

Arkansas PSC Docket 04-121-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Centerpoint Arkla. May 2005. For the Arkansas AG.

Maryland PSC Case No. 8990. Testimony Supporting Settlement on Interruptible Rate Design, Revenue Normalization Mechanism and Future Residential Rate Design for WGL. May 2005. For Maryland OPC.

CPUC App. 04-12-014. Revenue Requirements for SCE. May 2005. For TURN.

Arkansas PSC Docket 04-141-U. Revenue Requirements, Electric Heat Promotion Policy, and Rate Design for Arkansas Electric Co-operative Corp. March 2005. For the Arkansas AG.

CPUC App. 04-06-024. Electric Marginal Cost and Revenue Allocation for PG&E. March 2005. For TURN (case settled).

CPUC App. 04-11-003. Revenue Requirement Settlement for SDG&E's Palomar Combined Cycle Plant. March 2005. For TURN (joint testimony with SDG&E and Office of Ratepayer Advocates' witnesses)

CPUC App. 04-03-021. Gas Marginal Cost and Residential Rate Design for PG&E. January 2005. For TURN. (rate design issues settled)

CPUC App. 04-02-026. Cost-Effectiveness Analysis of Scenarios for Southern California Edison Company's (SCE's) San Onofre Steam Generator Replacement Project. December 2004. For TURN.

Arkansas PSC Docket 04-100-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Empire. November 2004. For the Arkansas AG. (case settled)

PUCN. Docket 04-5021. Consolidation of Sierra's Liquefied Propane Gas Rates with its Natural Gas Rates. August 2004. For Nevada BCP.

CPUC App. 04-01-009. Cost-Effectiveness Analysis of Scenarios for PG&E's Diablo Canyon Steam Generator Replacement Project. August 2004. For TURN.

Northwest Territories PUB. Evaluation of the Snare-Yellowknife Reliability Criteria of the Northwest Territories Power Corporation. July 2004. For the City of Yellowknife (joint testimony with R. L. Bruggeman).

Arkansas PSC Docket 01-041-U. EAI Request for Transition Cost Recovery. April 2004. For the Arkansas AG.

CPUC Apps. 02-12-027/02-12-028, Phase 2. Economic Evaluation of Performance Based Ratemaking (PBR) Framework for Sempra Energy Utilities. April 2004. For TURN.

PUCN Docket 03-12002. Marginal Cost and Rate Design for Sierra. March 2004. For Nevada BCP (case settled)

Arkansas PSC Docket 02-179-U. Gas Procurement Practices of AWG. March 2004. For the Arkansas AG.

City and County of San Francisco vs. Turlock Irrigation District, Non-Binding Arbitration (before Panelists Hanschen, O'Neill and Power). Regulatory Decisions that Led to the California Energy Crisis. March 2004. For the City and County of San Francisco. (case settled after appearance)

PUCN Docket 03-10001. Marginal Cost and Rate Design for NPC. January 2004. For Nevada BCP.

CPUC Rulemaking 01-10-024 (SDG&E Procurement Phase). Comparison of Costs for Palomar project and Otay Mesa, Mountainview, and Sempra DWR Contracts. January 2004. For TURN.



Alberta EUB. Dockets 1306818 and 1306819. Return Margin for Enmax Energy Corporation's Regulated Retail Tariff and Use of Equity Contributions from Ratepayers to Fund Enmax Power Corporation's Distribution Plant. January 2004. For Enmax Consumer Group (five groups of Enmax customers).

PUCN Dockets 03-6040 and 03-6041. Standby Rate Design for NPC and Sierra. November 2003. For Nevada BCP. (case settled)

CPUC Application 03-07-032. Review of SCE's Mountainview Powerplant. September 2003. For TURN.

CPUC Apps. 02-12-027/02-12-028. Revenue Requirement for SDG&E and Southern California Gas (SoCal Gas). September 2003. For TURN and UCAN.

Alberta EUB Docket 1271597 (Generic Cost of Capital). Business Risk of Alberta Utilities. July 2003. For the Consumer Group (nine Alberta electric and gas consumer groups). (joint testimony with Robert Liddle)

Maryland PSC Case No. 8959. Embedded and Marginal Cost of Service, and Review of Tariffed Service Charges for Washington Gas Light (WGL). June 2003. For Maryland OPC.

CPUC App. 02-11-017. Revenue Requirement for PG&E's Electric Generation and Electric and Gas Distribution Operations. May 2003. For TURN. (case settled after appearance)

Arkansas PSC Docket 02-227-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AWG. May 2003. For the Arkansas AG.

CPUC App. 03-07-032. Review of the Future of SCE's Mohave Coal Plant. April and October 2003, June 2004. For TURN.

CPUC Rulemaking 01-10-024. Renewable Portfolio Standard Implementation. April 2003. For TURN.

California Energy Commission (CEC) Integrated Electricity Policy Report. Electric Resource Costs. February 2003. For TURN (formal comment)

CPUC App. 01-10-011. Revenue Requirement and Electric Generation Demand Forecast for PG&E's Gas Transmission Rates. February 2003. For TURN. (case settled)

Alberta EUB Docket 1275494. Business Risk of Atco Electric. February 2003. For the FIRM Group (Alberta Federation of REAs and Alberta Assn. of Municipal Districts and Counties (REA/AAMDC), Alberta Irrigation Projects Assn., CCA, Alberta Urban Municipalities Assn., and PICA).

CPUC App. 02-05-004. Revenue Requirements and Resource Planning for SCE. December, 2002. For TURN.

Oklahoma Corporation Commission Cause No. PUD 200200166. Revenue Requirements, Cost of Service, and Residential Rate Design for Reliant Arkla Gas. October 2002. For the Oklahoma AG. (case settled)

Arkansas PSC Docket 02-024-U. Revenue Requirements, Cost of Service, and Residential Rate Design for AOG. August 2002. For the Arkansas AG.

CPUC Rulemaking 01-05-047. Demographic Analysis of California Residential Users and Proposals for Surcharge Relief for Lower-Middle-Income customers. August 2002. For TURN.

Alberta EUB Docket 1250392. Cost of Service for Aquila Networks Canada (ANCA). July 2002 For REA/AAMDC. (joint testimony with Arnie Reimer)

Maryland PSC Case No. 8920. Embedded and Marginal Cost of Service, and Analysis of Tariffed Service Charges for WGL. June 2002. For Maryland OPC. (case settled)

CPUC Rulemaking 02-01-011. Exit Fees for Direct Access Customers. June 2002. For TURN.

CPUC Rulemaking 01-10-024. Procurement of Renewable Resources by California Investor-Owned Utilities. May 2002. For TURN.

CPUC App. 00-10-045 et al. Ratemaking for Recovery of AB 265 Balances from SDG&E Customers. May, 2002. For UCAN.

Arkansas PSC Docket 01-243-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Reliant Arkla Gas. May 2002. For the Arkansas AG. (case settled)

PUCN Docket 01-11030. Cost of Service and Rate Design for Sierra. March 2002. For Nevada BCP.

Alberta EUB Docket 1250392. Business Risk of ANCA. March 2002. For the FIRM Group. (this part of case settled)

Alberta EUB Docket 1248859. Transmission Congestion Management Policy. For the FIRM Group. March 2002 (joint testimony with Eric Woychik)

PUCN Docket 01-10001. Cost of Service and Rate Design for NPC. January 2002. For Nevada BCP.

Arkansas PSC Docket 01-184U. Ratemaking for Ice Storm Damage for Entergy Arkansas, Inc., December 2001. For the Arkansas AG. (case settled)

Alberta EUB Docket 1244140. Article 24 Module. Payments to Generators for Transmission Must Run Services. For the FIRM Group. November 2001 (joint testimony with Eric Woychik)

PUCN Docket 01-7023. Revenue Requirement, Cost of Service, and Rate Design of Southwest Gas. November 2001. For Nevada AFL-CIO. (revenue requirements settled)

PUCN Docket 01-4047. Southwest Gas' Rules for Switching between Transportation and Sales Service. October 2001. For Nevada BCP.

Arkansas PSC Docket 00-190-U (second phase). Consumer Impacts of Electric Utility Restructuring. September 2001. For the Arkansas AG.

CPUC App. 00-11-038 et al. Department of Water Resources' Revenue Requirement for Service to Utility Customers. August 2001. For TURN (formal comment)

Arizona Commerce Commission, Dockets G-01551A-00-0309 And G-01551A-00-0127. Cost of Service and Rate Design for Southwest Gas. July 2001. For Complainants (Union Club of Arizona, Public Interest Research Group, et al.)

CPUC App. 00-11-038 et al. Ratemaking for Utility Retained Generation. July 2001. For TURN.

Arkansas PSC. Rate Unbundling testimony in 2001 for four co-ops and three investor-owned utilities, where cases were settled without hearing. January-June 2001. For the Arkansas AG. Details available on request.

CPUC App. 00-11-038 et al. Tiered Rate Design for Emergency Rate Surcharge. April 2001. For TURN.

Nevada PUC. Docket 01-1042. Divestiture of Utility Generating Plants. April 2001. For Nevada BCP. (testimony given orally).

CPUC App. 00-07-001. Marginal Cost and Revenue Allocation for Sierra's California System. February 2001. For TURN. (case settled)

CPUC App. 00-11-038 et al. Utility Financial Issues Related to Emergency Rate Relief. February 2001. For TURN.

CPUC App. 00-11-038 et al. Rate Design for Emergency Rate Relief and Ratemaking for Diablo Canyon Nuclear Plant. December 2000. For TURN.

Arkansas PSC. Rate unbundling testimony for 12 cooperatives where cases settled before hearing. (Cases not settled listed below.) For Arkansas AG. January-December 2000. Details available on request.

CPUC App. 00-05-024. Benefits of Retaining the Palo Verde and Four Corners Powerplants in Regulated Service. November 2000. For TURN and the CPUC's Office of Ratepayer Advocates (ORA). (case rendered moot by legislation)

Alberta EUB. Docket 2000257. Return Margin and Marketing Expenses under Epcor's Regulated Retail Rate Obligation Tariff. October 2000. For the FIRM Group. (case settled)

Alberta EUB Docket 2000136. Cost of Service and Rate Design for Atco Electric Distribution Service. October 2000. For REA/AAMDC.

Alberta EUB Docket 2000258. Testimony on UNCA Distribution Performance-Based Ratemaking (PBR) Proposal. (1) Economic Aspects (Indexing and Sharing). (2) Business Risk of Distribution Wires Business (also filed in Docket 2000136), and (3) Cost of Service. October 2000. For FIRM Group, except cost of service for REA/AAMDC. (case settled)

Arkansas PSC Docket 99-263-U. Rate Unbundling for Southwest Arkansas Electric Cooperative Corporation (ECC). October 2000. For the Arkansas AG. (three-party settlement opposed by industrial intervenor)

CPUC App. 99-03-014. PG&E's Marginal Electric Distribution Cost, Revenue Allocation, and Rate Design. September 2000. For TURN. (case dismissed due to energy crisis)

Arkansas PSC Docket 00-190-U. Consumer Impacts of Electric Utility Restructuring. September 2000. For the Arkansas AG.

CPUC App. 00-04-002. PG&E's Gas Marginal Costs. September 2000. For TURN.

Alberta EUB Docket 2000135. Cost of Service and Rate Design for ESBI Alberta Ltd. Transmission Service. August 2000. For the FIRM Group.

Arkansas PSC Docket 99-249-U. Rate Unbundling for EAI. July 2000. For the Arkansas AG. (settled except rate design)

CPUC App. 99-09-053. Projection of Future Revenue Sharing under Settlement allowing Transfer of PG&E's Hydroelectric Plants to an Affiliate with Revenue Sharing between the Affiliate and Ratepayers. August 2000. For TURN. (testimony never presented, rendered moot by legislation)

Alberta EUB. 2001 GTA for the Transmission Administrator. Rate Design for Reserves and Contribution Policy. August 2000. For the FIRM Group.

Alberta EUB. Ratemaking for Investment Credits for TransAlta's Industrial Customers. June 2000. For the FIRM Group. (joint testimony with J. Nahigian)

California PUC App. 99-09-053. Projection of Valuation and Future Ratemaking Results for Retention of PG&E's Hydroelectric Plants within the Utility. June 2000. For TURN and ORA.

California PUC App. 99-09-006. Ratemaking for Decommissioning of PG&E's Hunters Point Power Plant. June 2000. For City and County of San Francisco.

Wisconsin PSC Docket No. 6630-UR-111. Electric and Gas Cost of Service and Rate Design of Wisconsin Electric Power Company. March, 2000. For the Wisconsin Citizens Utility Board.

New Jersey Board of Public Utilities (BPU). Docket No. EX99090676. Competition and Customer Account Services. March 2000. For the New Jersey Division of the Ratepayer Advocate. (case settled)

CPUC App. 91-11-024 (1999 Rate Design Window). Electric Marginal Cost and Rate Design of SDG&E. March 2000. For UCAN.

CPUC App. 99-03-013 et al. Policy Analysis of Revenue Cycle Services and Energy Service Provider Fees and Charges. February 2000. For TURN.

PUCN Docket 99-7035. Cost Allocation in NPC's Deferred Energy Case. January 2000. For Nevada BCP.

Arkansas PSC. Docket 99-238-U. Unbundled Rates for the Ouachita Electric Cooperative Corp. December 1999. For the Arkansas AG. (case settled)

PUCN Docket 99-4005 Phase 2. Unbundled Distribution Revenue Requirement, Marginal Cost and Rate Design of NPC. November 1999. For Nevada BCP.

Maryland PSC. Case No. 8820. Affiliate Transaction Rules. October 1999. For Maryland OPC. (formal comments)

PUCN. Docket 99-4001 Phase 2. Unbundled Distribution Revenue Requirement, Marginal Costs and Rate Design of Sierra. October 1999. For Nevada BCP.

CPUC App. 99-04-024. SCE's 1997-98 Capital Additions. October 1999. For TURN.

Alberta EUB. Review of Power Purchase Agreements developed by the Independent Assessment Team. Need for Sharing or Reopeners in 20-Year Indexed Generation Contracts. September 1999. For the Consortium (of over 10 Alberta consumer groups and municipalities). (Joint Testimony with Mark Drazen)

PUCN Docket 99-4005 Phase 1. Unbundling Principles and Revenue Requirement Issues of NPC. August, 1999. For Nevada BCP.

PUCN Docket 99-4001 Phase 1. Unbundling Principles and Revenue Requirement Issues for Sierra. July 1999. For Nevada BCP.

CPUC App. 99-01-016 et al. Treatment of Securitized Revenue Bonds and Revenue Allocation Issues in Post Transition Ratemaking, Phase II. July 1999. For TURN and UCAN.

Alberta EUB. 1999-2000 GTA for the Transmission Administrator. Transmission Rate Design for Reserves. July, 1999. For the FIRM Group.

Arkansas PSC. Docket 98-339-U. Testimony in Support of the Cost of Service Settlement for Southwestern Electric Power Company (SWEPCO). July, 1999. For the Arkansas AG.

CPUC App. 99-01-016 et al. Revenue Allocation issues in Post Transition Ratemaking. July, 1999. For TURN.

Hawaii PUC. Docket 98-0013. Reasonableness of Contract Between Hawaii Electric Light Company (HELCO) and Encogen Hawaii, L.P. March, 1999. For Encogen Hawaii, L.P. (case settled)

CPUC App. 98-10-012 and 98-10-031. Marginal Cost and Rate Design for SoCal Gas and Electric Generation Rate Policy for Sempra Energy Gas Utilities. March 1999. For TURN and UCAN.

Alberta EUB. 1999-2000 General Tariff Applications. Differentiation of Risk among Regulated Functions of the Alberta Utilities. February, 1999. For the FIRM Group

Alberta EUB. Alberta Power Ltd. (APL) 1998 General Tariff Application Phase 2. Cost of Service and Rate Design. November, 1998. Generation and transmission costs for the FIRM Group, distribution costs and farm rate design for REA/AAMDC.

Alberta EUB. TransAlta Utilities (TAU) 1998 General Tariff Application Phase 2. October, 1998. Cost of Service and Rate Design. For the FIRM Group.

PUCN Docket No. 98-9038 and 98-8034. Metering and Billing as Potentially Competitive Services for NPC and Sierra. September, 1998. For Nevada BCP. (identical testimony filed in each docket)

Maryland PSC. Case No. 8791. Jurisdictional Allocation, Cost of Service and Rate Design of Potomac Electric Power Company. August, 1998. For Maryland OPC.

CPUC OII 98-09-007. Report on Tree Trimming Expenditures of PG&E 1987-1997. Direct Testimony July, 1998, rebuttal testimony March, 1999. For CPUC Consumer Services Division.

CPUC App. 97-12-020. Expenses and Capital Projects of PG&E. July, 1998. For TURN.

CPUC App. 98-01-016. SDG&E's Cost of Service and Performance Based Ratemaking. July, 1998. For UCAN.

CPUC App. 98-04-012. Transfer of the El Dorado Hydro Project from PG&E to the El Dorado Irrigation District. For El Dorado Irrigation District.

CPUC App. 96-12-009 et al. Revenue Cycle Service Unbundling. April, 1998. For TURN and UCAN.

CPUC App. 97-10-014 et al. Generation Capital Additions for PG&E and SCE. (PG&E settled) February 1998. For TURN.

PUCN. Dockets 97-11018 and 97-11028. Cost Unbundling of NPC and Sierra. February 1998 and December 1997. For Nevada BCP.

Virginia Corporation Commission. Case No. PUE960296. Stranded Costs, Regulatory Assets, and Alternative Ratemaking for Virginia Power. December, 1997. (part settled; part moved to future docket) For Southern Environmental Law Center.

CPUC App. 97-03-002. Gas Marginal Cost and Rate Design for PG&E. December, 1997. For TURN.

New Jersey BPU Docket EO97070456. Stranded Costs of Atlantic City Electric Company. December, 1997. For New Jersey Public Interest Intervenors (NJPII)

New Jersey BPU Docket EO97070462. Stranded Costs of Public Service Electric and Gas Company. November, 1997. For NJPII.

New Jersey BPU Docket EO 97070459. Stranded Costs of General Public Utilities. November, 1997. For NJPII.

Nevada PUC. Docket 97-8001. Structure for Unbundling Costs of Nevada Electric Utilities. September, 1997. For Nevada BCP.

CPUC App. 96-07-018. Impact of Closure of PG&E's El Dorado Hydro Project on PG&E's Revenue Requirement. September, 1997. For El Dorado Irrigation District.

CPUC App. 96-10-038. Economic and Affiliate Transaction Issues in the SoCal Gas-SDG&E merger. August, 1997. For TURN and UCAN.

CPUC App. 96-08-001 et al. Competitive Transition Charges for the California Utilities. May, 1997. For TURN and UCAN.

Nevada County Municipal Court. People v. Pacific Gas and Electric Company (PG&E) Authorized and Actual Tree Trimming Spending; PG&E Profits. April 1997. (testimony given orally) For Nevada County District Attorney.

CPUC App. 96-12-009. Unbundling Rates for the California Utilities. February 1997. For TURN and UCAN.

Nevada PSC. Southwest Gas Advice No. 346. Cost Allocation for Purchased Gas Adjustment Case. February 1997. For Nevada Office of Consumer Advocate (OCA – later renamed BCP)

PUCT Project No. 16536. Unbundling Electric Distribution Functions. January, 1997. For Environmental Defense. (formal comment)

CPUC App. 95-06-002. SoCal Gas' Performance-Based Ratemaking (PBR) Proposal: Indexing, Sharing, Residential Rate Design. October 1996. For TURN and California Department of General Services (DGS).

Washington Utilities and Transportation Commission. Docket UE-960195. Stranded Cost and Other Issues Affecting Merger of Puget Sound Power and Light with Washington Natural Gas. September 1996. For Washington Public Counsel.

CPUC App. 96-03-054. Ratemaking for PG&E's Diablo Canyon Nuclear Plant. September 1996. For TURN.

CEC Docket 95-ER-96. Rate Design Issues in Electric Restructuring. August 1996. For TURN.

CPUC App. 96-02-056. Ratemaking for SCE Share of the Palo Verde Nuclear Plant. August 1996. For TURN.

Alberta EUB. 1996 General Rate Application. Unbundling the Cost of Capital in Alberta's Restructuring. August 1996. For the FIRM Group.

CPUC App. 96-03-031. Marginal Cost and Residential Rate Design of SoCal Gas. July 1996. For TURN.

Northwest Territories PUB. Northwest Territories Power Corporation GRA. Evaluation of Reliability Criteria and the Snare Cascades Hydroelectric Project. May 1996. (case settled) For City of Yellowknife.

PUCT Docket 15000. Generation Market Structure. March 1996. For Environmental Defense (formal comment)

CPUC App. 94-12-005 Phase 2. Marginal Cost, Revenue Allocation, and Residential Rate Design of PG&E. December 1995. For TURN.

Bonneville Power Administration (BPA) 1996 Wholesale Power and Transmission Rate Case. Design of Ancillary Service Rates. September 1995. For Renewable Northwest Project.

CPUC App. 95-05-023 et al. Treatment of Customer Deposits in Utility Capital Structures. August 1995. For TURN.

U.S. District Court, San Diego. James v. Southern California Edison. Case No. 94-1085-J. Ratemaking for Potential Outage for San Onofre 3 before Commercial Operation in 1984. August 1995 (oral testimony). For Glenn James.

CPUC App. 93-12-025. Marginal Cost, Revenue Allocation, and Rate Design for SCE. June 1995. For TURN.

Ontario Energy Board (OEB) Docket HR 23. Cost Allocation and Backup Power Rate Design of Ontario Hydro. June 1995. For Independent Power Society of Ontario (IPPSO).

CPUC App. 94-11-015. Gas Load Forecast and Marginal Cost of PG&E. June 1995. For TURN.

OEB Docket E.B.R.O. 490. Cost Allocation for Ancillary Business Activities of Consumers Gas Company. May 1995. For HVAC Coalition.

CPUC App. 94-12-005. Revenue Requirement Issues for PG&E. May 1995. For TURN.

CPUC App. 94-12-005. PG&E's Customer Service, Phone Center and Disaster Planning. April 1995. For TURN.

British Columbia Utilities Commission. Electric Market Restructuring. April, 1995. For Columbia River Treaty Assn. (client withdrew prior to hearing)

CPUC App. 93-12-029. Evaluation of the Proposed Settlement of SCE's 1995 Test Year Rate Case. February, 1995. For TURN.

CPUC App. 94-10-023. Billing Determinants and Revenue Allocation for SDG&E. January, 1995. For UCAN.

Connecticut Department of Public Utility Control (DPUC). App. 94-04-01. Cost-Effectiveness and Alternative Ratemaking for Connecticut Yankee Nuclear Plant. December, 1994. For Connecticut Cogeneration Coalition and Connecticut Small Power Producers Assn. (CTCC/CSPPA).

OEB Docket E.L.B.R.G. 36. Structure and Governance of Ontario Hydro International, Inc. November, 1994. For IPPSO.

Alberta PUB. APL Phase II GRA. Evaluation of APL's Cost of Service Study. September, 1994. For REA/AAMDC.

CPUC App. 93-12-029. Evaluation of PBR for SCE. September, 1994. For TURN, DGS, EDF, Natural Resources Defense Council and Center for Energy Efficiency and Renewable Technologies.

Hawaii PUC. Docket No. 94-0079. Avoided Cost for HELCO and Price Offer Proposed by Enserch Development Corp (EDC) for Combined Cycle Cogeneration. September, 1994. For EDC.

CPUC App. 93-09-006. Marginal Cost, Billing Determinants, and Residential Rate Design for SoCal Gas. June, 1994. For TURN.

Nevada PSC Docket 93-11045. Marginal Cost and Revenue Allocation for NPC. June, 1994. (case settled) For Nevada OCA.

OEB Docket HR 22. Integrated Resource Planning at Ontario Hydro; Backup Power and Experimental Rate Design. May-June 1994. For IPPSO.

CPUC App. 93-12-025. SCE's Revenue Requirements.. April, 1994. For TURN.

CPUC App. 93-12-025. SCE's Demand-Side Management Programs. April, 1994. For DGS.

Chaminade Ltd. v. Owl Companies. American Arbitration Assn. History of PG&E Rate Design in the 1980s; Cost to Chaminade of Electricity and Fuel with and without Cogeneration. April, 1994. For Owl Companies. (oral testimony)

Hawaii PUC. Docket No. 7623. Timing of Power Need and Cost of New Combined Cycle Generation for HELCO. March, 1994. For EDC.

CEC Docket 93-ER-94. Northwest Power Availability. February, 1994. For the Independent Energy Producers Assn. (IEP).

Manitoba PUB. Manitoba Hydro 1994/95 GRA. Evaluation of Diesel Zone Costs and Rates. February, 1994. For Government of Canada, Department of Justice.

CPUC Application 92-10-017. SDG&E's PBR Base Rate Proposal. December 1993. For UCAN.

Alberta PUB. 1994 EEMA Forecast. Limits on Interruptible Loads; Energy Constraints in Alberta Utility System Planning. September 1993. For REA/AAMDC.

Connecticut DPUC. Docket 93-04-001. Fossil Plant Retirement Economics for Northeast Utilities (NU). August, 1993. For CTCC/CRRA.

CPUC App. 93-05-008 et al.. Evaluation of Proposal to Increase Equity Capital Ratio of Electric Utilities Due to Alleged Purchased Power Risk. August, 1993. For TURN.

OEB E.B.R.O. 483/484. DSM Program Design for Centra Gas Ontario. August, 1993. For Ontario Green Energy Coalition (GEC). (case settled)

OEB E.B.R.O. 485. DSM Program Design for Consumers Gas. August, 1993. For GEC. (case settled)

Yukon Utilities Board. 1993/94 General Rate Application of Yukon Energy Corporation/Yukon Electric Company Limited (YEC/YECL). Revenue Requirements; Rebuttal Testimony on Cost of Service. June 1993. (principal author with J. Helmich, M. Davies, and B. Walt) For City of Whitehorse.

CPUC App. 92-09-040. SDG&E's Fuel Budget Issues. May, 1993. (case settled) For UCAN.

CPUC App. 92-11-017. SoCal Gas' Low Income Conservation Programs. March, 1993. For California-Nevada Community Action Assn. (Cal-Neva) and The East Los Angeles Community Union .

CPUC App. 92-10-017. SDG&E's Performance Based Ratemaking for Generation and Dispatch. March, 1993. (case settled) For UCAN.

Hawaii PUC. Docket No. 7310. Avoided Cost Methods for Hawaiian Electric (HECO), HELCO, and Maui Electric (MECO). Direct, February, 1993, rebuttal May, 1993. For Hawaiian Sugar Planters Assn. (HSPA) and Wailuku River Hydro Company.

Ontario Environmental Assessment Board (EAB). Ontario Hydro Demand/Supply Plan (DSP). Alternative Supply Futures for the Ontario Hydro System. January, 1993. (utility withdrew filing) For IPPSO.

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