

May 29, 2020

BY RESS AND EMAIL

Ms. Christine Long
Board Secretary
Ontario Energy Board

Dear Ms. Long:

Re: EB-2019-0159 – Enbridge Gas Inc. – Hamilton Pipeline – GEC Interim Cost Claim

Please find attached GEC's interim cost claim in this matter. This claim includes the work of experts co-sponsored by Environmental Defence.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch

Cc: M. Millar, Z. Crnojacki, K. Elson, Enbridge

Ontario Energy Board
COST CLAIM FOR HEARINGS



Affidavit and Summary of Fees and Disbursements

This form should be used by a party to a hearing before the Board to identify the fees and disbursements that form the party's cost claim. Paper and electronic copies of this form and itemized receipts must be filed with the Board and served on one or more other parties as directed by the Board in the applicable Board order. Please ensure all required (yellow-shaded) fields are filled in and the Affidavit portion is signed and sworn or affirmed.

Instructions

- Required data input is indicated by yellow-shaded fields. Formulas are embedded in the form to assist with calculations.
- All claims must be in Canadian dollars. If applicable, state exchange rate and country of initial currency.
Rate: _____ Country: _____
- A separate "Detail of Fees and Disbursements Being Claimed" (comprising a "Statement of Fees Being Claimed" and a "Statement of Disbursements Being Claimed") is required for each lawyer, analyst/consultant and articling student/paralegal. However, only one "Summary of Fees and Disbursements" covering the whole of the party's cost claim should be provided.
- The cost claim must be supported by a completed Affidavit signed by a representative of the party.
- A CV for each consultant/analyst must be attached unless provided to the Board as prescribed on the Cost Award Tariff.

Except as provided in section 7.03 of the Practice Direction on Cost Awards, itemized receipts must be provided.

File # EB- <u>2019-0159</u>	Process: <u>Enbridge Hamilton Pipeline - Interim</u>
Party: <u>GEC</u>	Affiant's Name: <u>David Poch</u>
HST Number: _____	HST Rate Ontario: <u>13.00%</u>
Full Registrant <input type="checkbox"/>	Qualifying Non-Profit <input type="checkbox"/>
Unregistered <input checked="" type="checkbox"/>	Tax Exempt <input type="checkbox"/>
Other <input type="checkbox"/>	

Affidavit

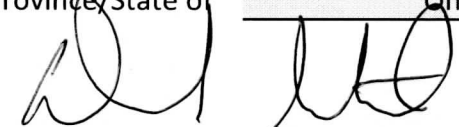
I, David Poch, of the City/Town of Township of Tay Valley
in the Province/State of Ontario, swear or affirm that:

1. I am a representative of the above-noted party (the "Party") and as such have knowledge of the matters attested to herein.
2. I have examined all of the documentation in support of this cost claim, including the attached "Summary of Fees and Disbursements Being Claimed", "Statement(s) of Fees Being Claimed" and "Statement(s) of Disbursements Being Claimed".
3. The attached "Summary of Fees and Disbursements Being Claimed", "Statement(s) of Fees Being Claimed" and "Statement(s) of Disbursements Being Claimed" include only costs incurred and time spent directly for the purposes of the Party's participation in the Ontario Energy Board process referred to above.
4. This cost claim does not include any costs for work done, or time spent, by a person that is an employee or officer of the Party as described in sections 6.05 and 6.09 of the Board's Practice Direction on Cost Awards.



Signature of Affiant

Sworn or affirmed before me at the City/Town of Township of Tay Valley,
in the Province/State of Ontario, on _____, (date).



Commissioner for taking Affidavits

Ontario Energy Board
COST CLAIM FOR HEARINGS



Affidavit and Summary of Fees and Disbursements

File # EB- 2019-0159 Process: Enbridge Hamilton Pipeline - Interim

Party: GEC

Summary of Fees and Disbursements Being Claimed

Legal/consultant/other fees	\$	33,577.00
Disbursements	\$	-
HST	\$	1,411.41
Total Cost Claim	\$	34,988.41

Payment Information

Make cheque payable to: David Poch in Trust

Send payment to this address: David Poch
1649 Old Brooke Rd.
Maberly, ON
K0H 2B0

Ontario Energy Board

COST CLAIM FOR HEARINGS



Detail of Fees and Disbursements Being Claimed

File # EB- <u>2019-0159</u>	Process: <u>Enbridge Hamilton Pipeline - Interim</u>
Party: <u>GEC</u>	Service Provider Name: <u>David Poch</u>

SERVICE PROVIDER TYPE (check one)	Year Called to Bar	Completed Years Practising/Years of Relevant Experience
Legal Counsel <input checked="" type="checkbox"/>	1980	40
Articling Student/Paralegal <input type="checkbox"/>		
Consultant <input type="checkbox"/>		Hourly Rate: <u>\$330</u>
Analyst <input type="checkbox"/>		
For Consultant/Analyst: <input type="checkbox"/> CV attached		HST Rate Charged (enter %): <u>13.0%</u>
<input type="checkbox"/> CV provided within previous 24 months		

Statement of Fees Being Claimed					
	Hours	Hourly Rate	Subtotal	HST	Total
Pre-hearing Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Technical Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Interrogatories					
Preparation	6.80	\$ 330.00	\$ 2,244.00	\$ 291.72	\$ 2,535.72
Responses		\$ 330.00	\$ -	\$ -	\$ -
Issues Conference					
Preparation	7.90	\$ 330.00	\$ 2,607.00	\$ 338.91	\$ 2,945.91
Attendance		\$ 330.00	\$ -	\$ -	\$ -
ADR - Settlement Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Proposal Preparation		\$ 330.00	\$ -	\$ -	\$ -
Argument					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Oral Hearing					
Preparation	18.20	\$ 330.00	\$ 6,006.00	\$ 780.78	\$ 6,786.78
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Other Conferences					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Case Management		\$ 170.00	\$ -	\$ -	\$ -
TOTAL SERVICE PROVIDER FEES			\$ 10,857.00	\$ 1,411.41	\$ 12,268.41

Ontario Energy Board

COST CLAIM FOR HEARINGS



Detail of Fees and Disbursements Being Claimed

File # EB- <u>2019-0159</u>	Process: <u>Enbridge Hamilton Pipeline - Interim</u>
Party: <u>GEC</u>	Service Provider Name: <u>Paul Chernick</u>

SERVICE PROVIDER TYPE (check one)	Year Called to Bar	Completed Years Practising/Years of Relevant Experience
Legal Counsel <input type="checkbox"/>		42
Articling Student/Paralegal <input type="checkbox"/>		
Consultant <input checked="" type="checkbox"/>		Hourly Rate: \$330
Analyst <input type="checkbox"/>		
For Consultant/Analyst: <input checked="" type="checkbox"/> CV attached		HST Rate Charged (enter %):
<input type="checkbox"/> CV provided within previous 24 months		

Statement of Fees Being Claimed					
	Hours	Hourly Rate	Subtotal	HST	Total
Pre-hearing Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Technical Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Interrogatories					
Preparation	10.50	\$ 330.00	\$ 3,465.00	\$ -	\$ 3,465.00
Responses		\$ 330.00	\$ -	\$ -	\$ -
Issues Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
ADR - Settlement Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Proposal Preparation		\$ 330.00	\$ -	\$ -	\$ -
Argument					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Oral Hearing					
Preparation	33.00	\$ 330.00	\$ 10,890.00	\$ -	\$ 10,890.00
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Other Conferences					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Case Management		\$ 170.00	\$ -	\$ -	\$ -
TOTAL SERVICE PROVIDER FEES			\$ 14,355.00	\$ -	\$ 14,355.00

Ontario Energy Board

COST CLAIM FOR HEARINGS



Detail of Fees and Disbursements Being Claimed

File # EB- <u>2019-0159</u>	Process: <u>Enbridge Hamilton Pipeline - Interim</u>
Party: <u>GEC</u>	Service Provider Name: <u>Chris Neme</u>

SERVICE PROVIDER TYPE (check one)	Year Called to Bar	Completed Years Practising/Years of Relevant Experience
Legal Counsel <input type="checkbox"/>	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 100px; height: 20px;" type="text"/> 40
Articling Student/Paralegal <input type="checkbox"/>		
Consultant <input checked="" type="checkbox"/>		
Analyst <input type="checkbox"/>		
For Consultant/Analyst: <input checked="" type="checkbox"/> CV attached		Hourly Rate: <input style="width: 100px; height: 20px;" type="text"/> \$330
<input type="checkbox"/> CV provided within previous 24 months		HST Rate Charged (enter %): <input style="width: 100px; height: 20px;" type="text"/>

Statement of Fees Being Claimed					
	Hours	Hourly Rate	Subtotal	HST	Total
Pre-hearing Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Technical Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Interrogatories					
Preparation	13.00	\$ 330.00	\$ 4,290.00	\$ -	\$ 4,290.00
Responses		\$ 330.00	\$ -	\$ -	\$ -
Issues Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
ADR - Settlement Conference					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Proposal Preparation		\$ 330.00	\$ -	\$ -	\$ -
Argument					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Oral Hearing					
Preparation	9.00	\$ 330.00	\$ 2,970.00	\$ -	\$ 2,970.00
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Other Conferences					
Preparation		\$ 330.00	\$ -	\$ -	\$ -
Attendance		\$ 330.00	\$ -	\$ -	\$ -
Case Management		\$ 170.00	\$ -	\$ -	\$ -
TOTAL SERVICE PROVIDER FEES			\$ 7,260.00	\$ -	\$ 7,260.00

Ontario Energy Board

COST CLAIM FOR HEARINGS



Detail of Fees and Disbursements Being Claimed

File # EB- <u>2019-0159</u>	Process: <u>Enbridge Hamilton Pipeline - Interim</u>
Party: <u>GEC</u>	Service Provider Name: <u>Emily Bergan</u>

SERVICE PROVIDER TYPE (check one)	Year Called to Bar	Completed Years Practising/Years of Relevant Experience
Legal Counsel <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="text" value="2"/>
Articling Student/Paralegal <input type="checkbox"/>		
Consultant <input checked="" type="checkbox"/>		Hourly Rate: <input type="text" value="\$170"/>
Analyst <input type="checkbox"/>		
For Consultant/Analyst: <input checked="" type="checkbox"/> CV attached		HST Rate Charged (enter %): <input type="text"/>
<input type="checkbox"/> CV provided within previous 24 months		

Statement of Fees Being Claimed					
	Hours	Hourly Rate	Subtotal	HST	Total
Pre-hearing Conference					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Attendance		\$ 170.00	\$ -	\$ -	\$ -
Technical Conference					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Attendance		\$ 170.00	\$ -	\$ -	\$ -
Interrogatories					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Responses		\$ 170.00	\$ -	\$ -	\$ -
Issues Conference					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Attendance		\$ 170.00	\$ -	\$ -	\$ -
ADR - Settlement Conference					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Attendance		\$ 170.00	\$ -	\$ -	\$ -
Proposal Preparation		\$ 170.00	\$ -	\$ -	\$ -
Argument					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Oral Hearing					
Preparation	6.50	\$ 170.00	\$ 1,105.00	\$ -	\$ 1,105.00
Attendance		\$ 170.00	\$ -	\$ -	\$ -
Other Conferences					
Preparation		\$ 170.00	\$ -	\$ -	\$ -
Attendance		\$ 170.00	\$ -	\$ -	\$ -
Case Management		\$ 170.00	\$ -	\$ -	\$ -
TOTAL SERVICE PROVIDER FEES			\$ 1,105.00	\$ -	\$ 1,105.00

ACCOUNT

Date: May 25, 2020

To: GEC

Re: Enbridge Gas Hamilton Pipeline – OEB file EB-2019- 0159

For services rendered on behalf of GEC in this matter (see dockets attached)

Fees at OEB tariff for purposes of costs request:

Fees 32.9 hrs. @ \$330.00 =	\$10,857.00
Disbursements (see summary)	\$0
Subtotal	\$10,857.00
GST	\$1,411.41
Total Costs	\$12,268.41

This is my account E&OE



David Poch

GST# 11020 1506

A		B	C	D	E	F	G	H	I
Time Docket for David Poch: EB-2019-0159 Dawn Parkway Expansion (Kirkwall to Hamilton)			Interrogatories		Issues Conf.		Arg.	Oral Hrg.	
Date	Description of work	Prep	Respond	Prep	Attend		Prep	Attend	
2019									
	initial review of filing and meet Hamilton 350								
Nov 24	reps							3	
26	t/c Shepherd, Gibbons							0.5	
	further review of application, review								
	correspondence and notice, correspond								
Jan 8	clients, and file intervention.							1.75	
23	t/c Elson re witnesses etc.							0.3	
	t/c TC counsel and case mngr. re TC position								
	and evidence. Report to client and experts.								
	Review EGI objection to scope of participation,								
27	confer other parties and draft initial response.				2.5				
28	revise draft letter				0.75				
	correspond Shepherd re coordination and								
29	witnesses							0.1	
	review draft issues list, confer client, review								
	guidelines etc., draft submissions, confer other								
31	parties				3				
Feb 1	correspond client				0.2				
	review correspondence, research re 'public								
7	interest', finalize comments				0.75				
	review evid and correspondence, research								
10	potential witnesses							1.2	
	review correspondence, discuss case with								
11	Chernick, and correspond client							0.6	
	review evid., correspond OEB re schedule to								
13	include experts							0.4	
	review WGI reply and respond on procedural								
20	issue				0.5				
21	review ED reply and finalize GEC reply				0.2				
25	review draft ED lrs.	1.2							
	correspond clients and other parties re								
Mar 2	coordinated efforts							0.15	
	review P.O. 1 and correspond experts re lrs								
6	and other parties re witnessing							0.15	
9	t/c Chernick, Shepherd, Neme, prep							2.25	
10	prep	1.5						1.25	
	review correspondence and write OEB re								
11	evidence, and correspond re: lrs	0.15						0.3	
	review correspondence with other parties re								
12	gas supply expert							0.1	
17	correspond re witness coordination							0.2	
	T/c Chernick re: FRPO coordination etc..								
	Conference call Quinn, Elston. Correspond								
	Chernick re evidence coordination. Draft								
18	response to Zora re same.							2	
	Correspond experts re topics. confer Elston re								
19	response to Zora and submit							0.25	
20	draft evidence plan							0.75	
23	confer CN and correspond							0.15	
	review LPMA lrs and correspond CN and PC								
	re same. Initial scan 5 year supply plan review								
24	evid.	0.3						0.5	
	confer re: IRS, draft evidence questions, need								
25	for IR extension, and submit request	0.5						0.5	
27	edit lrs and confer re same, submit	1.75							
Apr 2	confer re lrs and evidence deadline	0.2							
3	review added lrs, edit and confer	1.2							
23	Review correspondence, and respond							0.2	
30	correspond client re: consultation issue							0.1	
	review corresp., confer experts and advise								
May 4	clients							0.15	
	confer ED, SEC, FRPO, VECC, PP, Neme,								
	clients re requesting conditions for								
5	adjournment and correspond Board							1.25	
14	review EGD reply re adjournment							0.1	
	TOTALS 32.9 Hours	6.8			7.9			18.2	

Resource Insight, Inc.
Arlington, MA 02476

Invoice Date:	Invoice #:
2/29/2020	2756
965 GEC/EGI/D-P21	

Bill To
Green Energy Coalition David Poch

Description	Hours/Qty	Rate	Amount
Paul L. Chernick	1	330.00	330.00
Canadian Dollars reflected on the invoice		Total	\$330.00
		Payments/Credits	\$0.00
		Balance Due	\$330.00

Resource Insight, Inc.
5 Water Street, Arlington, MA 02476
Ph : 781-646-1505

Worker Entry Report from 02/01/2020 to 02/29/2020

Date	Service Item	Description	Status	Bill able	Total Hours:
Worker : Paul L. Chernick					
Customer : 965 GEC/EGI/D-P21					
02/14/20	Consulting Canada	background research on gas use trends	Approved	Yes	1.00
Total for 965 GEC/EGI/D-P21:					1.00
Total for Paul L. Chernick:					1.00
Grand Total:					1.00

Tuesday, Mar 10, 2020 01:57:26 PM EDT

Resource Insight, Inc.
Arlington, MA 02476

Invoice Date:	Invoice #:
3/31/2020	2781
965 GEC/EGI/D-P21	

Bill To
Green Energy Coalition David Poch dpoch@eclaw.ca

Description	Hours/Qty	Rate	Amount
Paul L. Chernick	8	330.00	2,640.00
Canadian Dollars reflected on the invoice		Total	\$2,640.00
		Payments/Credits	\$0.00
		Balance Due	\$2,640.00

Resource Insight, Inc.
5 Water Street, Arlington, MA 02476
Ph : 781-646-1505

Worker Entry Report from 03/01/2020 to 03/31/2020

Date	Service Item	Description	Status	Bill able	Total Hours:
Worker : Paul L. Chernick					
Customer : 965 GEC/EGI/D-P21					
03/12/20	Consulting Canada	filing review	Approved	Yes	2.00
03/13/20	Consulting Canada	filing review	Approved	Yes	2.00
03/18/20	Consulting Canada	review issues and outside documents	Approved	Yes	4.00
Total for 965 GEC/EGI/D-P21:					8.00
Total for Paul L. Chernick:					8.00
Grand Total:					8.00

Tuesday, Apr 14, 2020 07:05:53 PM EDT

Resource Insight, Inc.
Arlington, MA 02476

Invoice Date:	Invoice #:
4/30/2020	2808
965 GEC/EGI/D-P21	

Bill To
Green Energy Coalition David Poch dpoch@celaw.ca

Description	Hours/Qty	Rate	Amount
Paul L. Chernick	23	330.00	7,590.00
Canadian Dollars reflected on the invoice		Total	\$7,590.00
		Payments/Credits	\$0.00
		Balance Due	\$7,590.00

Resource Insight, Inc.
Arlington, MA 02476

Invoice Date:	Invoice #:
4/30/2020	2808
965 GEC/EGI/D-P21	

Bill To
Green Energy Coalition David Poch dpoch@eclaw.ca

Description	Hours/Qty	Rate	Amount
Paul L. Chernick	23	235.62	5,419.26
U.S. Dollars		Total	\$5,419.26
		Payments/Credits	\$0.00
		Balance Due	\$5,419.26

Resource Insight, Inc.
5 Water Street, Arlington, MA 02476
Ph : 781-646-1505

Worker Entry Report from 04/01/2020 to 04/30/2020

Date	Service Item	Description	Status	Billable	Total Hours:
Worker : Paul L. Chernick					
Customer : 965 GEC/EGI/D-P21					
04/01/20	Consulting Canada	review filing, Board Staff discovery questions, draft discovery2	Approved	Yes	1.00
04/02/20	Consulting Canada	review filing, Board Staff discovery questions, draft discovery2	Approved	Yes	4.50
04/03/20	Consulting Canada	review filing, Board Staff discovery questions, draft discovery2	Approved	Yes	5.00
04/06/20	Consulting Canada	organize analysis; review other party discovery; economic projections	Approved	Yes	2.50
04/07/20	Consulting Canada	organize analysis; review other party discovery; economic projections	Approved	Yes	2.00
04/09/20	Consulting Canada	organize analysis; review other party discovery; economic projections	Approved	Yes	1.00
04/10/20	Consulting Canada	organize analysis; review other party discovery; economic projections	Approved	Yes	0.50
04/16/20	Consulting Canada	gas leakage issues; ga	Approved	Yes	1.50
04/22/20	Consulting Canada	scheduling and review of documents; regional carbon reduction plans	Approved	Yes	1.50
04/23/20	Consulting Canada	scheduling and review of documents; regional carbon reduction plans	Approved	Yes	2.00
04/25/20	Consulting Canada	scheduling and review of documents; regional carbon reduction plans	Approved	Yes	1.50
Total for 965 GEC/EGI/D-P21:					23.00
Total for Paul L. Chernick:					23.00
Grand Total:					23.00

Thursday, May 07, 2020 07:37:01 PM EDT

Resource Insight, Inc.
5 Water Street, Arlington, MA 02476
Ph : 781-646-1505

Worker Entry Report from 04/28/2020 to 05/27/2020

Date	Service Item	Description	Status	Bill able	Total Hours:
Worker : Paul L. Chernick					
Customer : 965 GEC/EGI/D-P21					
05/03/20	Consulting Canada	data on downstream load conditions, pipeline capacity; wrap up for pause	Pending	Yes	7.00
05/04/20	Consulting Canada	data on downstream load conditions, pipeline capacity; wrap up for pause	Pending	Yes	4.50
Total for 965 GEC/EGI/D-P21:					11.50
Total for Paul L. Chernick:					11.50
Grand Total:					11.50

Wednesday, May 27, 2020 08:48:29 PM EDT

Energy Futures Group, Inc.

PO Box 587
Hinesburg, VT 05461
Phone: (802) 482-5001
Fax: (802) 329-2143



Invoice

TO: Green Energy Coalition

David Poch
1649 Old Brooke Road
Maberly, ON K0H 2B0
(613) 264-0055
dpoch@eelaw.ca

Invoice #:3932

Invoice Date: 4/3/2020

Invoice Period: 3/1/2020-3/31/2020

Job Name: 2020 Enbridge Pipeline

Terms: Net 30 Days

Consultant Labor	Job-Phase-Project	Project Description	Rate	Hours	Amount
Chris Neme	1038-00-00	2020 Enbridge Pipeline	\$330.00	20.00	\$6,600.00
EFG Labor Subtotal:				20.00	\$6,600.00

TOTAL DUE THIS INVOICE:	\$6,600.00 CAD
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Energy Futures Group, Inc.

PO Box 587
Hinesburg, VT 05461
Phone: (802) 482-5001
Fax: (802) 329-2143



Task Description

Invoice #:3932
Job Code: 1038
Job Name: 2020 Enbridge Pipeline
Invoice Period: 3/1/2020-3/31/2020
Consultant: Chris Neme

Date	Phase-Project	Project Description	Hours	Task Description
3/23/2020	00-00	2020 Enbridge Pipeline	3.00	Review Enbridge proposal, analysis of data
3/24/2020	00-00	2020 Enbridge Pipeline	4.00	Review Enbridge filing; communications w/D.Poch, P. Chernick;
3/25/2020	00-00	2020 Enbridge Pipeline	5.50	Review Enbridge filing, draft interrogatories
3/26/2020	00-00	2020 Enbridge Pipeline	5.50	review Enbridge filing, analysis of data, draft Interrogatories
3/27/2020	00-00	2020 Enbridge Pipeline	2.00	Review 5-year gas plan; finalize Interrogatories; calls w/D. Poch
TOTAL:			20.00	

Energy Futures Group, Inc.

PO Box 587
Hinesburg, VT 05461
Phone: (802) 482-5001
Fax: (802) 329-2143



Invoice

TO: Green Energy Coalition

David Poch
1649 Old Brooke Road
Maberly, ON K0H 2B0
(613) 264-0055
dpoch@eelaw.ca

Invoice #:3988

Invoice Date: 5/8/2020

Invoice Period: 4/1/2020-4/30/2020

Job Name: 2020 Enbridge Pipeline

Terms: Net 30 Days

Consultant Labor	Job-Phase-Project	Project Description	Rate	Hours	Amount
Chris Neme	1038-00-00	2020 Enbridge Pipeline	\$330.00	2.00	\$660.00
Emily Bergan	1038-00-00	2020 Enbridge Pipeline	\$170.00	6.50	\$1,105.00
EFG Labor Subtotal:				8.50	\$1,765.00

TOTAL DUE THIS INVOICE:	\$1,765.00 CAD
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Energy Futures Group, Inc.

PO Box 587

Hinesburg, VT 05461

Phone: (802) 482-5001

Fax: (802) 329-2143



Task Description

Invoice #:3988

Job Code: 1038

Job Name: 2020 Enbridge Pipeline

Invoice Period: 4/1/2020-4/30/2020

Consultant: Chris Neme

Date	Phase-Project	Project Description	Hours	Task Description
4/6/2020	00-00	2020 Enbridge Pipeline	0.50	Research on gas DR, discuss further research needed w/E.Bergan and D.Hill
4/7/2020	00-00	2020 Enbridge Pipeline	0.50	Research on DR
4/30/2020	00-00	2020 Enbridge Pipeline	1.00	Research on gas DR, call to discuss w/Emily B.
TOTAL:			2.00	

Energy Futures Group, Inc.

PO Box 587

Hinesburg, VT 05461

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Task Description

Invoice #:3988

Job Code: 1038

Job Name: 2020 Enbridge Pipeline

Invoice Period: 4/1/2020-4/30/2020

Consultant: Emily Bergan

Date	Phase-Project	Project Description	Hours	Task Description
4/6/2020	00-00	2020 Enbridge Pipeline	1.25	Call with Chris to discuss research needs, reaching out to contacts for gas DR resources, creating excel table of results
4/7/2020	00-00	2020 Enbridge Pipeline	2.00	Gas demand response research, reviewing DR reports
4/14/2020	00-00	2020 Enbridge Pipeline	0.50	Reviewing emails from research contacts and documenting responses
4/30/2020	00-00	2020 Enbridge Pipeline	2.75	Research and reviewing Consumers MI rate case for DR Pilot, phone call with Chris Neme to discuss research findings
TOTAL:			6.50	

Professional Summary

Chris specializes in analysis of markets for energy efficiency, demand response, renewable energy and strategic electrification measures, as well as the design and evaluation of programs and policies to promote them. During his 25+ years in the clean energy industry, Mr. Neme has worked for energy regulators, utilities, government agencies and advocacy organizations in more than 30 states, 7 Canadian provinces and several European countries. He has defended expert witness testimony in nearly 60 cases before regulatory commissions in 13 different jurisdictions; he has also testified before several state legislatures. Chris has also authored or co-authored numerous reports and papers regarding clean energy policies and programs, including the first edition (Spring 2017) of the National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources, an update of that Manual addressing all distributed energy resources (June 2020) and several reports on non-wires alternatives.

Experience

2010-present: Principal, Energy Futures Group, Hinesburg, VT

1999-2010: Director of Planning & Evaluation, Vermont Energy Investment Corp., Burlington, VT

1993-1999: Senior Analyst, Vermont Energy Investment Corp., Burlington, VT

1992-1993: Energy Consultant, Lawrence Berkeley National Laboratory, Gaborone, Botswana

1986-1991: Senior Policy Analyst, Center for Clean Air Policy, Washington, DC

Education

M.P.P., University of Michigan, 1986

B.A., Political Science, University of Michigan, 1985

Selected Projects

- **Natural Resources Defense Council (Illinois, Michigan and Ohio).** Critically review multi-year efficiency, demand response, electrification, distribution system investment and integrated resource plans filed by Illinois, Michigan & Ohio utilities. Draft/defend regulatory testimony on critiques. Represent NRDC in regular stakeholder-utility processes developing efficiency policy manuals, annual TRM updates, annual NTG updates, evaluation plans and other work. Also represent NRDC in collaborative development of non-wires alternative pilots. Supported development of Illinois clean energy legislation adopted in late 2016, as well as new legislation to update the 2016 law that is currently pending. (2010 to present)

Energy Futures Group, Inc

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- **Ontario Energy Board.** Serve on provincial gas DSM Evaluation Advisory Committee. Work includes input on multi-year evaluation plans, input on scopes of work for evaluation studies, serving on OEB teams that review and score proposals submitted in response to evaluation RFPs, and critical review and input on independent evaluator assessments of utilities' annual gas savings claims. Also serve on advisory committees on gas and electric efficiency potential studies and advisory committee on carbon price forecast studies. (2015-present)
- **Green Energy Coalition (Ontario).** Represent coalition of environmental groups in regulatory proceedings, utility negotiations and stakeholder meetings on DSM policies (including integrated resource planning on pipeline expansions) and utility proposed DSM Plans. (1993 to present)
- **E4TheFuture.** Co-authored first edition (Spring 2017) of the National Standard Practice Manual (NSPM) for cost-effectiveness analysis of energy efficiency. Presenting the NSPM for EE to a wide variety of audiences across the U.S. and Canada; helping several to assess how to use it to refine current practices. Co-authoring updated NSPM (expected June 2020) that will expand focus from just EE to address all distributed energy resources. (2016 to present)
- **New Jersey Board of Public Utilities.** Serve on management team responsible for statewide delivery of New Jersey Clean Energy Programs. Lead strategic planning; support regulatory filings, cost-effectiveness analysis & evaluation work. (2015 to present). Served on management team for start-up of residential and renewables programs for predecessor project. (2006-2010)
- **Regulatory Assistance Project - U.S.** Provide guidance on efficiency policy and programs. Lead author on strategic reports on program options for decarbonizing Vermont buildings, achieving 30% electricity savings in 10 years, using efficiency to defer T&D system investments, & bidding efficiency into capacity markets. (2010 to present)
- **Energy Efficiency Alberta.** Assisting EEA in providing input to Alberta Utilities Commission on the role efficiency resources can play in reducing electric system costs. (2019 to present)
- **Citizens Action Coalition of Indiana.** Critically reviewing how energy efficiency resources are being modeled in IRPs of several Indiana electric utilities, as well as the design of energy efficiency program portfolios. (2018 to present)
- **Consumers Association of Canada (Manitoba) and Winnipeg Harvest.** Critically reviewed and filed regulatory testimony on Efficiency Manitoba's first three-year plan (2020-2023), with particular emphasis on the extent to which the plan supported advanced heat pump technology as both an electric efficiency measure and a key to future building electrification. (2019-2020).
- **Efficiency Vermont.** Provided technical support in review of avoided cost assumptions, as well as related policies on cost-effectiveness analyses of efficiency resources (2019).
- **Earth Justice and Southern Alliance for Clean Energy.** Helped critically review Florida utilities' efficiency potential studies and proposed 2020-2024 energy efficiency savings targets. (2019)
- **Regulatory Assistance Project - Europe.** Provide on-going support on efficiency policies and programs in the United Kingdom, Germany, and other countries. Reviewed draft European Union policies on Energy Savings Obligations, EM&V protocols, and related issues. Drafted policy brief on efficiency feed-in-tariffs and roadmap for residential retrofits. (2009 to 2018)

- **Green Mountain Power (Vermont).** Support development and implementation of GMP's compliance plan for Vermont RPS Tier 3 requirement to reduce customers' direct consumption of fossil fuels, with significant emphasis on strategic electrification strategies. Also developed 10-year forecast of sales that could result from three different levels of policy/program promotion of residential electric space heating, electric water heating and electric vehicles. (2016 to 2018)
- **Alberta Energy Efficiency Alliance.** Drafted white paper how treatment of "efficiency as a resource" could be institutionalized in Alberta. The paper followed several presentations to government agencies and others on behalf of the Pembina Institute. (2017 to 2018)
- **Southern Environmental Law Center.** Assessed reasonableness of Duke Energy's historic efficiency program savings claims, as well as the design of their efficiency program portfolios for 2019. Filed expert witness testimony on findings in North Carolina dockets (2018).
- **Toronto Atmospheric Fund.** Helped draft an assessment of efficiency potential from retrofitting of cold climate heat pumps into electrically heated multi-family buildings (2017).
- **Northeast Energy Efficiency Partnerships.** Helped manage Regional EM&V forum project estimating savings for emerging technologies, including field study of cold climate heat pumps. Led assessment of best practices on use of efficiency to defer T&D investment. (2009 to 2015)
- **Ontario Power Authority.** Managed jurisdictional scans on leveraging building efficiency labeling/disclosure requirements and non-energy benefits in cost-effectiveness screening. Supported staff workshop on the role efficiency can play in deferring T&D investments. Presented on efficiency trends for Advisory Council on Energy Efficiency. (2012-2015)
- **Vermont Public Interest Research Group.** Conducted comparative analysis of the economic and environmental impacts of fuel-switching from oil/propane heating to either natural gas or efficient, cold climate electric heat pumps. Filed regulatory testimony on findings. (2014-2015)
- **New Hampshire Electric Co-op.** Led assessment of the co-op's environmental and social responsibility programs' promotion of whole building efficiency retrofits, cold climate heat pumps and renewable energy systems. Presented recommendations to the co-op Board. (2014)
- **National Association of Regulatory Utility Commissioners (NARUC).** Assessed alternatives to first year savings goals to eliminate disincentives to invest in longer-lived measures and programs. (2013)
- **California Investor-Owned Utility.** Senior advisor on EFG project to compare the cost of saved energy across ~10 leading U.S. utility portfolios. The research sought to determine if there are discernable differences in the cost of saved energy related to utility spending in specific non-incentive categories, including administration, marketing, and EM&V. (2013)
- **DC Department of the Environment (Washington DC).** Part of VEIC team administering the DC Sustainable Energy Utility (SEU). Helped characterize the DC efficiency market and supporting the design of efficiency programs that the SEU will be implementing. (2011 to 2012)
- **Ohio Sierra Club.** Filed and defended expert witness testimony on the implications of not fully bidding all efficiency resources into the PJM capacity market. (2012)

- **Regulatory Assistance Project – Global.** Assisted RAP in framing several global research reports. Co-authored the first report – an extensive “best practices guide” on government policies for achieving energy efficiency objectives, drawing on experience with a variety of policy mechanism employed around the world. (2011)
- **Tennessee Valley Authority.** Assisted CSG team providing input to TVA on the redesign of its residential efficiency program portfolio to meet aggressive new five-year savings goals. (2010)
- **New York State Energy Research and Development Authority (NYSERDA).** Led residential & renewables portions of several statewide efficiency potential studies. (2001 to 2010)
- **Ohio Public Utilities Commission.** Senior Advisor to a project to develop a web-based Technical Reference Manual (TRM). The TRM includes deemed savings assumptions, deemed calculated savings algorithms and custom savings protocols. It was designed to serve as the basis for all electric and gas efficiency program savings claims in the state. (2009 to 2010)
- **Vermont Electric Power Company.** Led residential portion of efficiency potential study to assess alternatives to new transmission line. Testified before Public Service Board. (2001-2003)
- **Efficiency Vermont.** Served on Sr. Management team. Supported initial project start-up. Oversaw residential planning, input to regulators on evaluation, input to regional EM&V forum, development of M&V plan and other aspects of bidding efficiency into New England’s Forward Capacity Market (FCM), and development and updating of nation’s first TRM. (2000 to 2010)
- **Long Island Power Authority Clean Energy Plan.** Led team that designed the four major residential programs (three efficiency, one PV) incorporated into the plan in 1999. Oversaw extensive technical support to the implementation of those programs. This involved assistance with the development of goals and budgets, development of savings algorithms, cost-effectiveness screening, and on-going program design refinements. (1998 to 2009)

Selected Publications and Reports

- *National Standard Practice Manual for Assessing Cost-Effectiveness of Distributed Energy Resources*, (with Tim Woolf and others), forthcoming Summer 2020
- *Reducing CO₂ Emissions from Vermont Buildings: Potential and Cost-Effectiveness of Select Program Options*, Regulatory Assistance Project, February 13, 2019 (with Richard Faesy)
- *Pumping Energy Savings: Recommendations for Accelerating Heat Pump Adoption in Ontario's Electrically Heated Multi-Residential Buildings*, Toronto Atmospheric Fund, July 2018 (with Devon Calder, Brian Purcell and Judy Simon)
- *National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources*, Edition 1, Spring 2017 (with Tim Woolf, Marty Kushler, Steven Schiller and Tom Eckman)
- *The Next Quantum Leap in Efficiency: 30% Electricity Savings in 10 Years*, Proceedings of the 2016 ACEEE Summer Study on Energy Efficiency in Buildings, Volume 9, pp. 1-14 (with Jim Grevatt, Rich Sedano and Dave Farnsworth)
- *The Next Quantum Leap in Efficiency: 30% Electricity Savings in Ten Years*, published by the Regulatory Assistance Project, February 2016 (with Jim Grevatt)
- *Energy Efficiency as a T&D Resource: Lessons from Recent U.S. Efforts to Use Geographically Targeted Efficiency Programs to Defer T&D Investments*, published by Northeast Energy Efficiency Partnerships, January 9, 2015 (with Jim Grevatt)
- *Unleashing Energy Efficiency: The Best Way to Comply with EPA's Clean Power Plan*, Public Utilities Fortnightly, October 2014, pp. 30-38 (with Tim Woolf, Erin Malone and Robin LeBaron)
- *The Resource Value Framework: Reforming Energy Efficiency Cost-Effectiveness Screening*, published by the National Efficiency Screening Project, August 2014 (with Tim Woolf et al.)
- *U.S. Experience with Participation of Energy Efficiency in Electric Capacity Markets*, Regulatory Assistance Project, August 2014 (with Richard Cowart)
- *The Positive Effects of Energy Efficiency on the German Electricity Sector*, IEPEC 2014 Conference, September 2014 (with Friedrich Seefeldt et al.)
- *Final Report: Alternative Michigan Energy Savings Goals to Promote Longer Term Savings and Address Small Utility Challenges*, prepared for the Michigan Public Service Commission, September 13, 2013 (with Optimal Energy)
- *Energy Efficiency Feed-in-Tariffs: Key Policy and Design Considerations*, Proceedings of ECEEE 2013 Summer Study, pp 305-315 (with Richard Cowart)
- *Can Competition Accelerate Energy Savings? Options and Challenges for Efficiency Feed-in-Tariffs*, published in *Energy & Environment*, Volume 24, No. 1-2, February 2013 (with Richard Cowart)
- *An Energy Efficiency Feed-in-Tariff: Key Policy and Design Considerations*, published by the Regulatory Assistance Project, March/April 2012 (with Richard Cowart)

- *U.S. Experience with Efficiency as a Transmission and Distribution System Resource*, published by the Regulatory Assistance Project, February 2012 (with Rich Sedano)
- *Achieving Energy Efficiency: A Global Best Practices Guide on Government Policies*, published by the Regulatory Assistance Project, February 2012 (with Nancy Wasserman)
- *Residential Efficiency Retrofits: A Roadmap for the Future*, published by the Regulatory Assistance Project, May 2011 (with Meg Gottstein and Blair Hamilton)
- *Is it Time to Ditch the TRC?* Proceedings of ACEEE 2010 Summer Study on Energy Efficiency in Buildings, Volume 5 (with Marty Kushler)
- *Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, in Energy Efficiency, published on line 06 June 2010 (with Cheryl Jenkins and Shawn Enterline)
- *A Comparison of Energy Efficiency Programmes for Existing Homes in Eleven Countries*, prepared for the British Department of Energy and Climate Change, 19 February, 2010 (with Blair Hamilton et al.)
- *Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, Proceedings of the 2009 European Council on an Energy Efficient Economy Summer Study, pp. 175-183 (with Cheryl Jenkins and Shawn Enterline)
- *Playing with the Big Boys: Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, Proceedings of ACEEE 2008 Summer Study Conference on Energy Efficiency in Buildings, Volume 5 (with Cheryl Jenkins and Blair Hamilton)
- *Recommendations for Community-Based Energy Program Strategies, Final Report*, developed for the Energy Trust of Oregon, June 1, 2005 (with Dave Hewitt et al.)
- *Shareholder Incentives for Gas DSM: Experience with One Canadian Utility*, Proceedings of ACEEE 2004 Summer Study on Energy Efficiency in Buildings, Volume 5 (with Kai Millyard)
- *Cost Effective Contributions to New York's Greenhouse Gas Emission Reduction Targets from Energy Efficiency and Renewable Energy Resources*, ACEEE 2004 Summer Study Proceedings, Volume 8 (with David Hill et al.)
- *Opportunities for Accelerated Electric Energy Efficiency Potential in Quebec: 2005-2012*, prepared for Regroupement national des conseils regionaux de l'environnement du Quebec, Regroupement des organismes environnementaux energie and Regroupement pour la responsabilite sociale des entreprises, May 16, 2004 (with Eric Belliveau, John Plunkett and Phil Dunskey)
- *Review of Connecticut's Conservation and Load Management Administrator Performance, Plans and Incentives*, for Connecticut Office of Consumer Counsel, October 31, 2003 (with John Plunkett, Phil Mosenthal, Stuart Slote, Francis Wyatt, Bill Kallock and Paul Horowitz)
- *Energy Efficiency and Renewable Energy Resource Development Potential in New York State*, for New York Energy Research and Development Authority, August 2003 (with John Plunkett, Phil Mosenthal, Stave Nadel, Neal Elliott, David Hill and Christine Donovan)

- *Assessment of Economically Deliverable Transmission Capacity from Targeted Energy Efficiency Investments in the Inner and Metro-Area and Northwest and Northwest/Central Load Zones*, for Vermont Electric Power Company, Final Report: April 2003 (with John Plunkett et al.)
- *Residential HVAC Quality Installation: New Partnership Opportunities and Approaches*, Proceedings of ACEEE 2002 Summer Study Conference on Energy Efficiency in Buildings, Volume 6 (with Rebecca Foster, Mia South, George Edgar and Put Murphy)
- *A Modified Delphi Approach to Predict Market Transformation Program Effects*, Proceedings of ACEEE 2000 Summer Study Conference on Energy Efficiency in Buildings, Volume 6 (with Phil Mosenthal et al.)
- *Using Targeted Energy Efficiency Programs to Reduce Peak Electrical Demand and Address Electric System Reliability Problems*, published by the American Council for an Energy Efficient Economy, November 2000 (with Steve Nadel and Fred Gordon)
- *Energy Savings Potential from Addressing Residential Air Conditioner and Heat Pump Installation Problems*, American Council for an Energy Efficient Economy, February 1999 (with John Proctor and Steve Nadel)
- *Promoting High Efficiency Residential HVAC Equipment: Lessons Learned from Leading Utility Programs*, Proceedings of ACEEE 1998 Summer Study Conference on Energy Efficiency in Buildings, Volume 2 (with Jane Peters and Denise Rouleau)
- *PowerSaver Home Program Impact Evaluation*, report to Potomac Edison, February 1998 (with Andy Shapiro, Ken Tohinaka and Karl Goetze)
- *A Tale of Two States: Detailed Characterization of Residential New Construction Practices in Vermont and Iowa*, Proceedings of ACEEE 1996 Summer Study Conference on Energy Efficiency in Buildings, Volume 2 (with Blair Hamilton, Paul Erickson, Peter Lind and Todd Presson)
- *New Smart Protocols to Avoid Lost Opportunities and Maximize Impact of Residential Retrofit Programs*, in Proceedings of ACEEE 1994 Summer Study on Energy Efficiency in Buildings (with Blair Hamilton and Ken Tohinaka)
- *Economic Analysis of Woodchip Systems and Finding Capital to Pay for a Woodchip Heating System*, Chapters 6 and 8 in Woodchip Heating Systems: A Guide for Institutional and Commercial Biomass Installations, published by the Council of Northeastern Governors, July 1994
- *PSE&G Lost Opportunities Study: Current Residential Programs and Relationship to Lost Opportunities*, prepared for the PSE&G DSM Collaborative, June 1994 (with Blair Hamilton, Paul Berkowitz and Wayne DeForest)
- *PSE&G Lost Opportunities Study: Preliminary Residential Market Analysis*, prepared for the PSE&G DSM Collaborative, May 1994 (with Blair Hamilton, Paul Berkowitz and Wayne DeForest)
- *Long-Range Evaluation Plan for the Vermont Weatherization Assistance Program*, prepared for the Vermont Office of Economic Opportunity, February 1994 (with Blair Hamilton and Ken Tohinaka)

- *Impact Evaluation of the 1992-1993 Vermont Weatherization Assistance Program*, prepared for the Vermont Office of Economic Opportunity, December 1993 (with Blair Hamilton and Ken Tohinaka)
- *Electric Utilities and Long-Range Transport of Mercury and Other Toxic Air Pollutants*, published by the Center for Clean Air Policy, 1991
- *Coal and Emerging Energy and Environmental Policy*, in *Natural Resources and Environment*, 1991 (with Don Crane)
- *Acid Rain: The Problem*, in *EPA Journal*, January/February 1991 (with Ned Helme)
- *An Efficient Approach to Reducing Acid Rain: The Environmental Benefits of Energy Conservation*, published by the Center for Clean Air Policy, 1989
- *The Untold Story: The Silver Lining for West Virginia in Acid Rain Control*, published by the Center for Clean Air Policy, 1988
- *Midwest Coal by Wire: Addressing Regional Energy and Acid Rain Problems*, published by the Center for Clean Air Policy, 1987
- *Acid rain: Road to a Middleground Solution*, published by the Center for Clean Air Policy, 1987 (with Ned Helme)

Professional Summary

Emily is an Analyst at Energy Futures Group in Hinesburg, Vermont, providing research and analytical support. At EFG, Emily has contributed to a number of projects including drafting of regulatory documents establishing the necessity of energy efficiency financing programs, benchmarking the performance of various efficiency programs, and documenting North American experience with non-wires alternatives, remote and virtual building efficiency audits, and advanced commercial lighting products. Prior to joining EFG, Emily worked in the legal sector, working as a paralegal in the Energy and Telecommunications division of the Massachusetts Attorney General's Office. She graduated from the University of Connecticut in 2014, where she studied Resource Economics concentrating in Environmental Economics and Policy.

Experience

2018-present: Analyst, Energy Futures Group, Hinesburg, VT

2016-2017: Legal Assistant, Kensington Swan, Wellington, New Zealand

2014-2015: Paralegal, Massachusetts Attorney General's Office, Boston, MA

Education

B.S., Resource Economics, University of Connecticut, 2014

Selected Projects

- **California Alternative Energy and Advanced Transportation Authority.** Drafted the Initial Statement of Reasons, a regulatory document demonstrating the necessity of California's small business energy efficiency financing program. Tracked and verified energy saving measures for incoming small business financing projects. (2019)
- **Connecticut Energy Efficiency Board.** Conducted research on utility funded community energy efficiency programs. Developed survey on Virtual and Remote Energy Assessments to assess options for home energy audits during COVID-19 shut down. (2020).
- **Alliance to Save Energy.** Reviewed Technical Reference Manuals and analyzed data to gain better understanding of how lighting savings are being measured throughout the U.S. (2019)
- **EfficiencyOne Nova Scotia.** Benchmarked utility efficiency plans to support testimony regarding EfficiencyOne's 2020-2022 DSM Plan. (2019)
- **DesignLights Consortium.** Developed database to compare lighting products to DLC qualified product list standards, coordinated interviews with lighting industry professionals. (2018)
- **Vermont Public Service Department.** Coordinated logistics and developed presentation tools for stakeholder meetings for the Energy Code Update, conducted analysis on code measure costing to support Residential Energy Code Update. (2018)

- **Indiana Citizens Action Coalition.** Reviewed discovery and conducted research and analysis on Mid-West energy efficiency to support testimony. (2018-2020)
- **Natural Resources Defense Council (Midwest).** Conducted research on the success of non-wires alternatives pilot programs. (2018)
- **Vermont Public Service Department.** Developed database and calculations for benchmarking the performance of Efficiency Vermont relative to other utility and non-utility administrators of efficiency program portfolios throughout the Northeast and beyond. Generated graphics for the final report to present key project conclusions. (2018)
- **Vermont Public Service Department.** Delivered survey insights and provided support for clean energy financing report. (2018-2020)

PAUL L. CHERNICK

Resource Insight, Inc.
5 Water Street
Arlington, Massachusetts 02476

SUMMARY OF PROFESSIONAL EXPERIENCE

- 1986–Present* **President, Resource Insight, Inc.** Consults and testifies in utility and insurance economics. Reviews utility supply-planning processes and outcomes: assesses prudence of prior power planning investment decisions, identifies excess generating capacity, analyzes effects of power-pool-pricing rules on equity and utility incentives. Reviews electric-utility rate design. Estimates magnitude and cost of future load growth. Designs and evaluates conservation programs for electric, natural-gas, and water utilities, including hook-up charges and conservation cost recovery mechanisms. Determines avoided costs due to cogenerators. Evaluates cogeneration rate risk. Negotiates cogeneration contracts. Reviews management and pricing of district heating systems. Determines fair profit margins for automobile and workers' compensation insurance lines, incorporating reward for risk, return on investments, and tax effects. Determines profitability of transportation services. Advises regulatory commissions in least-cost planning, rate design, and cost allocation.
- 1981–86* **Research Associate, Analysis and Inference, Inc.** (Consultant, 1980–81). Researched, advised, and testified in various aspects of utility and insurance regulation. Designed self-insurance pool for nuclear decommissioning; estimated probability and cost of insurable events, and rate levels; assessed alternative rate designs. Projected nuclear power plant construction, operation, and decommissioning costs. Assessed reasonableness of earlier estimates of nuclear power plant construction schedules and costs. Reviewed prudence of utility construction decisions. Consulted on utility rate-design issues, including small-power-producer rates; retail natural-gas rates; public-agency electric rates, and comprehensive electric-rate design for a regional power agency. Developed electricity cost allocations between customer classes. Reviewed district-heating-system efficiency. Proposed power-plant performance standards. Analyzed auto-insurance profit requirements. Designed utility-financed, decentralized conservation program. Analyzed cost-effectiveness of transmission lines.
- 1977–81* **Utility Rate Analyst, Massachusetts Attorney General.** Analyzed utility filings and prepared alternative proposals. Participated in rate negotiations, discovery, cross-examination, and briefing. Provided extensive expert testimony before various regulatory agencies. Topics included demand forecasting, rate design, marginal costs, time-of-use rates, reliability issues, power-pool operations, nuclear-power cost projections, power-plant cost-benefit analysis, energy conservation, and alternative-energy development.

EDUCATION

SM, Technology and Policy Program, Massachusetts Institute of Technology, February 1978.

SB, Civil Engineering Department, Massachusetts Institute of Technology, June 1974.

HONORS

Chi Epsilon (Civil Engineering)

Tau Beta Pi (Engineering)

Sigma Xi (Research)

Institute Award, Institute of Public Utilities, 1981.

PUBLICATIONS

“Price Effects as a Benefit of Energy-Efficiency Programs” (with John Plunkett), *2014 ACEEE Summer Study on Energy Efficiency in Buildings* (5) 57–5-69. 2014.

“Environmental Regulation in the Changing Electric-Utility Industry” (with Rachel Brailove), *International Association for Energy Economics Seventeenth Annual North American Conference* (96–105). Cleveland, Ohio: USAEE. 1996.

“The Price is Right: Restructuring Gain from Market Valuation of Utility Generating Assets” (with Jonathan Wallach), *International Association for Energy Economics Seventeenth Annual North American Conference* (345–352). Cleveland, Ohio: USAEE. 1996.

“The Future of Utility Resource Planning: Delivering Energy Efficiency through Distributed Utilities” (with Jonathan Wallach), *International Association for Energy Economics Seventeenth Annual North American Conference* (460–469). Cleveland, Ohio: USAEE. 1996.

“The Future of Utility Resource Planning: Delivering Energy Efficiency through Distribution Utilities” (with Jonathan Wallach), *1996 Summer Study on Energy Efficiency in Buildings*, Washington: American Council for an Energy-Efficient Economy 7(7.47–7.55). 1996.

“The Allocation of DSM Costs to Rate Classes,” *Proceedings of the Fifth National Conference on Integrated Resource Planning*. Washington: National Association of Regulatory Utility Commissioners. May 1994.

“Environmental Externalities: Highways and Byways” (with Bruce Biewald and William Steinhurst), *Proceedings of the Fifth National Conference on Integrated Resource Planning*. Washington: National Association of Regulatory Utility Commissioners. May 1994.

“The Transfer Loss is All Transfer, No Loss” (with Jonathan Wallach), *The Electricity Journal* 6:6 (July 1993).

“Benefit-Cost Ratios Ignore Interclass Equity” (with others), *DSM Quarterly*, Spring 1992.

“ESCOs or Utility Programs: Which Are More Likely to Succeed?” (with Sabrina Birner), *The Electricity Journal* 5:2, March 1992.

“Determining the Marginal Value of Greenhouse Gas Emissions” (with Jill Schoenberg), *Energy Developments in the 1990s: Challenges Facing Global/Pacific Markets, Vol. II*, July 1991.

“Monetizing Environmental Externalities for Inclusion in Demand-Side Management Programs” (with Emily Caverhill), *Proceedings from the Demand-Side Management and the Global Environment Conference*, April 1991.

“Accounting for Externalities” (with Emily Caverhill). *Public Utilities Fortnightly* 127(5), March 1 1991.

“Methods of Valuing Environmental Externalities” (with Emily Caverhill), *The Electricity Journal* 4(2), March 1991.

“The Valuation of Environmental Externalities in Energy Conservation Planning” (with Emily Caverhill), *Energy Efficiency and the Environment: Forging the Link*. American Council for an Energy-Efficient Economy; Washington: 1991.

“The Valuation of Environmental Externalities in Utility Regulation” (with Emily Caverhill), *External Environmental Costs of Electric Power: Analysis and Internalization*. Springer-Verlag; Berlin: 1991.

“Analysis of Residential Fuel Switching as an Electric Conservation Option” (with Eric Espenhorst and Ian Goodman), *Gas Energy Review*, December 1990.

“Externalities and Your Electric Bill,” *The Electricity Journal*, October 1990, p. 64.

“Monetizing Externalities in Utility Regulations: The Role of Control Costs” (with Emily Caverhill) *Proceedings from the NARUC National Conference on Environmental Externalities*, October 1990.

“Monetizing Environmental Externalities in Utility Planning” (with Emily Caverhill), in *Proceedings from the NARUC Biennial Regulatory Information Conference*, September 1990.

“Analysis of Residential Fuel Switching as an Electric Conservation Option” (with Eric Espenhorst and Ian Goodman), in *Proceedings from the NARUC Biennial Regulatory Information Conference*, September 1990.

“A Utility Planner’s Checklist for Least-Cost Efficiency Investment” (with John Plunkett) in *Proceedings from the NARUC Biennial Regulatory Information Conference*, September 1990.

Environmental Costs of Electricity (with Richard Ottinger et al.). Oceana; Dobbs Ferry, New York: September 1990.

“Demand-Side Bidding: A Viable Least-Cost Resource Strategy” (with John Plunkett and Jonathan Wallach), in *Proceedings from the NARUC Biennial Regulatory Information Conference*, September 1990.

“Incorporating Environmental Externalities in Evaluation of District Heating Options” (with Emily Caverhill), *Proceedings from the International District Heating and Cooling Association 81st Annual Conference*, June 1990.

“A Utility Planner’s Checklist for Least-Cost Efficiency Investment,” (with John Plunkett), *Proceedings from the Canadian Electrical Association Demand-Side Management Conference*, June 1990.

“Incorporating Environmental Externalities in Utility Planning” (with Emily Caverhill), *Canadian Electrical Association Demand Side Management Conference*, May 1990.

“Is Least-Cost Planning for Gas Utilities the Same as Least-Cost Planning for Electric Utilities?” in *Proceedings of the NARUC Second Annual Conference on Least-Cost Planning*, September 10–13 1989.

“Conservation and Cost-Benefit Issues Involved in Least-Cost Planning for Gas Utilities,” in *Least Cost Planning and Gas Utilities: Balancing Theories with Realities*, Seminar proceedings from the District of Columbia Natural Gas Seminar, May 23 1989.

“The Role of Revenue Losses in Evaluating Demand-Side Resources: An Economic Re-Appraisal” (with John Plunkett), *Summer Study on Energy Efficiency in Buildings, 1988*, American Council for an Energy Efficient Economy, 1988.

“Quantifying the Economic Benefits of Risk Reduction: Solar Energy Supply Versus Fossil Fuels,” in *Proceedings of the 1988 Annual Meeting of the American Solar Energy Society*, American Solar Energy Society, Inc., 1988, pp. 553–557.

“Capital Minimization: Salvation or Suicide?,” in I. C. Bupp, ed., *The New Electric Power Business*, Cambridge Energy Research Associates, 1987, pp. 63–72.

“The Relevance of Regulatory Review of Utility Planning Prudence in Major Power Supply Decisions,” in *Current Issues Challenging the Regulatory Process*, Center for Public Utilities, Albuquerque, New Mexico, April 1987, pp. 36–42.

“Power Plant Phase-In Methodologies: Alternatives to Rate Shock,” in *Proceedings of the Fifth NARUC Biennial Regulatory Information Conference*, National Regulatory Research Institute, Columbus, Ohio, September 1986, pp. 547–562.

“Assessing Conservation Program Cost-Effectiveness: Participants, Non-participants, and the Utility System” (with A. Bachman), *Proceedings of the Fifth NARUC Biennial Regulatory Information Conference*, National Regulatory Research Institute, Columbus, Ohio, September 1986, pp. 2093–2110.

“Forensic Economics and Statistics: An Introduction to the Current State of the Art” (with Eden, P., Fairley, W., Aller, C., Vencill, C., and Meyer, M.), *The Practical Lawyer*, June 1 1985, pp. 25–36.

“Power Plant Performance Standards: Some Introductory Principles,” *Public Utilities Fortnightly*, April 18 1985, pp. 29–33.

“Opening the Utility Market to Conservation: A Competitive Approach,” *Energy Industries in Transition, 1985–2000*, Proceedings of the Sixth Annual North American Meeting of the International Association of Energy Economists, San Francisco, California, November 1984, pp. 1133–1145.

“Insurance Market Assessment of Technological Risks” (with Meyer, M., and Fairley, W) *Risk Analysis in the Private Sector*, pp. 401–416, Plenum Press, New York 1985.

“Revenue Stability Target Ratemaking,” *Public Utilities Fortnightly*, February 17 1983, pp. 35–39.

“Capacity/Energy Classifications and Allocations for Generation and Transmission Plant” (with M. Meyer), *Award Papers in Public Utility Economics and Regulation*, Institute for Public Utilities, Michigan State University 1982.

Design, Costs and Acceptability of an Electric Utility Self-Insurance Pool for Assuring the Adequacy of Funds for Nuclear Power Plant Decommissioning Expense, (with Fairley, W., Meyer, M., and Scharff, L.) (NUREG/CR-2370), U.S. Nuclear Regulatory Commission, December 1981.

Optimal Pricing for Peak Loads and Joint Production: Theory and Applications to Diverse Conditions (Report 77-1), Technology and Policy Program, Massachusetts Institute of Technology, September 1977.

REPORTS

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“Review of NEPOOL Performance Incentive Program,” Massachusetts Energy Facilities Siting Council, April 12 1988.

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PRESENTATIONS

“Rethinking Utility Rate Design—Retail Demand and Energy Charges,” Solar Power PV Conference, Boston MA, February 24, 2016.

“Residential Demand Charges - Load Effects, Fairness & Rate Design Implications.” Web seminar sponsored by the NixTheFix Forum. September 2015.

“The Value of Demand Reduction Induced Price Effects.” With Chris Neme. Web seminar sponsored by the Regulatory Assistance Project. March 2015.

“Adding Transmission into New York City: Needs, Benefits, and Obstacles.” Presentation to FERC and the New York ISO on behalf of the City of New York. October 2004.

“Plugging Into a Municipal Light Plant.” With Peter Enrich and Ken Barna. Panel presentation as part of the 2004 Annual Meeting of the Massachusetts Municipal Association. January 2004.

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“Cost Recovery and Utility Incentives.” Day-long presentation as part of the Demand-Side-Management Training Institute’s workshop, “DSM for Public Interest Groups,” October 1993.

“Cost Allocation for Utility Ratemaking.” With Susan Geller. Day-long workshop for the staff of the Connecticut Department of Public Utility Control, October 1993.

“Comparing and Integrating DSM with Supply.” Day-long presentation as part of the Demand-Side-Management Training Institute’s workshop, “DSM for Public Interest Groups,” October 1993.

“DSM Cost Recovery and Rate Impacts.” Presentation as part of “Effective DSM Collaborative Processes,” a week-long training session for Ohio DSM advocates sponsored by the Ohio Office of Energy Efficiency, August 1993.

“Cost-Effectiveness Analysis.” Presentation as part of “Effective DSM Collaborative Processes,” a week-long training session for Ohio DSM advocates sponsored by the Ohio Office of Energy Efficiency, August 1993.

“Environmental Externalities: Current Approaches and Potential Implications for District Heating and Cooling” (with R. Brailove), International District Heating and Cooling Association 84th Annual Conference. June 1993.

“Using the Costs of Required Controls to Incorporate the Costs of Environmental Externalities in Non-Environmental Decision-Making.” Presentation at the American Planning Association 1992 National Planning Conference; presentation cosponsored by the Edison Electric Institute. May 1992.

“Cost Recovery and Decoupling” and “The Clean Air Act and Externalities in Utility Resource Planning” panels (session leader), DSM Advocacy Workshop. April 15 1992.

“Overview of Integrated Resources Planning Procedures in South Carolina and Critique of South Carolina Demand Side Management Programs,” Energy Planning Workshops; Columbia, S.C. October 21 1991.

“Least Cost Planning and Gas Utilities.” Demand-Side Management and the Global Environment Conference; Washington, D.C. April 22 1991.

Conservation Law Foundation Utility Energy Efficiency Advocacy Workshop; Boston, February 28 1991.

“Least-Cost Planning in a Multi-Fuel Context.” NARUC Forum on Gas Integrated Resource Planning; Washington, D.C., February 24 1991.

“Accounting for Externalities: Why, Which and How?” Understanding Massachusetts’ New Integrated Resource Management Rules. Needham, Massachusetts, November 9 1990.

New England Gas Association Gas Utility Managers’ Conference. Woodstock, Vermont, September 10 1990.

“Quantifying and Valuing Environmental Externalities.” Presentation at the Lawrence Berkeley Laboratory Training Program for Regulatory Staff, sponsored by the U.S. Department of Energy’s Least-Cost Utility Planning Program; Berkeley, California, February 2 1990;

“Conservation in the Future of Natural Gas Local Distribution Companies.” District of Columbia Natural Gas Seminar; Washington, D.C. May 23 1989.

“Conservation and Load Management for Natural Gas Utilities,” Massachusetts Natural Gas Council; Newton, Massachusetts. April 3 1989.

New England Conference of Public Utilities Commissioners, Environmental Externalities Workshop. Portsmouth, New Hampshire, January 22–23 1989.

“Assessment and Valuation of External Environmental Damages.” New England Utility Rate Forum. Plymouth, Massachusetts, October 11 1985; “Lessons from Massachusetts on Long Term Rates for QFs”.

“Reviewing Utility Supply Plans.” Massachusetts Energy Facilities Siting Council; Boston, Massachusetts. May 30 1985.

“Power Plant Performance.” National Association of State Utility Consumer Advocates; Williamstown, Massachusetts. August 13 1984.

“Utility Rate Shock,” National Conference of State Legislatures; Boston, Massachusetts, August 6 1984.

“Review and Modification of Regulatory and Rate Making Policy,” National Governors’ Association Working Group on Nuclear Power Cost Overruns; Washington, D.C., June 20 1984.

“Review and Modification of Regulatory and Rate Making Policy,” Annual Meeting of the American Association for the Advancement of Science, Session on Monitoring for Risk Management; Detroit, Michigan, May 27 1983.

ADVISORY ASSIGNMENTS TO REGULATORY COMMISSIONS

District of Columbia Public Service Commission, Docket No. 834, Phase II; Least-cost planning procedures and goals. August 1987 to March 1988.

Connecticut Department of Public Utility Control, Docket No. 87-07-01, Phase 2; Rate design and cost allocations. March 1988 to June 1989.

Austin City Council, Austin Energy Rates, March to June 2012.

Puerto Rico Energy Commission, Puerto Rico Electric Power Authority, rate design issues, September 2015 to present.

EXPERT TESTIMONY

1. **Mass. EFSC 78-12/MDPU 19494, Phase I; Boston Edison 1978 forecast; Massachusetts Attorney General. June 1978.**

Appliance penetration projections, price elasticity, econometric commercial forecast, peak demand forecast. Joint testimony with Susan C. Geller.

2. **Mass. EFSC 78-17, Northeast Utilities 1978 forecast; Massachusetts Attorney General. September 1978.**

Specification of economic/demographic and industrial models, appliance efficiency, commercial model structure and estimation.

3. **Mass. EFSC 78-33, Eastern Utilities Associates 1978 forecast; Massachusetts Attorney General. November 1978.**

Household size, appliance efficiency, appliance penetration, price elasticity, commercial forecast, industrial trending, peak demand forecast.

4. **Mass. DPU 19494, Phase II; Boston Edison Company construction program; Massachusetts Attorney General. April 1979.**

Review of numerous aspects of the 1978 demand forecasts of nine New England electric utilities, constituting 92% of projected regional demand growth, and of the NEPOOL demand forecast. Joint testimony with Susan Geller.

5. **Mass. DPU 19494, Phase II; Boston Edison Company construction program; Massachusetts Attorney General. April 1979.**

Reliability, capacity planning, capability responsibility allocation, customer generation, co-generation rates, reserve margins, operating reserve allocation. Joint testimony with S. Finger.

6. **U.S. ASLB NRC 50-471, Pilgrim Unit 2; Commonwealth of Massachusetts. June 1979.**

Review of the Oak Ridge National Laboratory and NEPOOL demand forecast models; cost-effectiveness of oil displacement; nuclear economics. Joint testimony with Susan Geller.

7. **Mass. DPU 19845, Boston Edison time-of-use-rate case; Massachusetts Attorney General. December 1979.**

Critique of utility marginal cost study and proposed rates; principles of marginal cost principles, cost derivation, and rate design; options for reconciling costs and revenues. Joint testimony with Susan Geller.

8. **Mass. DPU 20055, petition of Eastern Utilities Associates, New Bedford G. & E., and Fitchburg G. & E. to purchase additional shares of Seabrook Nuclear Plant; Massachusetts Attorney General. January 1980.**

Review of demand forecasts of three utilities purchasing Seabrook shares; Seabrook power costs, including construction cost, completion date, capacity factor, O&M expenses, interim replacements, reserves and uncertainties; alternative energy sources, including conservation, cogeneration, rate reform, solar, wood and coal conversion.

9. **Mass. DPU 20248**, petition of Massachusetts Municipal Wholesale Electric Company to purchase additional share of Seabrook Nuclear Plant; Massachusetts Attorney General. June 1980.

Nuclear power costs; update and extension of MDPU 20055 testimony.

10. **Mass. DPU 200**, Massachusetts Electric Company rate case; Massachusetts Attorney General. June 1980.

Rate design; declining blocks, promotional rates, alternative energy, demand charges, demand ratchets; conservation: master metering, storage heating, efficiency standards, restricting resistance heating.

11. **Mass. EFSC 79-33**, Eastern Utilities Associates 1979 forecast; Massachusetts Attorney General. July 1980.

Customer projections, consistency issues, appliance efficiency, new appliance types, commercial specifications, industrial data manipulation and trending, sales and resale.

12. **Mass. DPU 243**, Eastern Edison Company rate case; Massachusetts Attorney General. August 1980.

Rate design: declining blocks, promotional rates, alternative energy, master metering.

13. **Texas PUC 3298**, Gulf States Utilities rates; East Texas Legal Services. August 1980.

Inter-class revenue allocations, including production plant in-service, O&M, CWIP, nuclear fuel in progress, amortization of canceled plant residential rate design; interruptible rates; off-peak rates. Joint testimony with M. B. Meyer.

14. **Mass. EFSC 79-1**, Massachusetts Municipal Wholesale Electric Company Forecast; Massachusetts Attorney General. November 1980.

Cost comparison methodology; nuclear cost estimates; cost of conservation, cogeneration, and solar.

15. **Mass. DPU 472**, recovery of residential conservation-service expenses; Massachusetts Attorney General. December 1980.

Conservation as an energy source; advantages of per-kWh allocation over per-customer-month allocation.

- 16. Mass. DPU 535;** regulations to carry out Section 210 of PURPA; Massachusetts Attorney General. January 1981 and February 1981.

Filing requirements, certification, qualifying-facility status, extent of coverage, review of contracts; energy rates; capacity rates; extra benefits of qualifying facilities in specific areas; wheeling; standardization of fees and charges.

- 17. Mass. EFSC 80-17,** Northeast Utilities 1980 forecast; Massachusetts Attorney General. March 1981.

Specification process, employment, electric heating promotion and penetration, commercial sales model, industrial model specification, documentation of price forecasts and wholesale forecast.

- 18. Mass. DPU 558,** Western Massachusetts Electric Company rate case; Massachusetts Attorney General. May 1981.

Rate design including declining blocks, marginal cost conservation impacts, and promotional rates. Conservation, including terms and conditions limiting renewable, cogeneration, small power production; scope of current conservation program; efficient insulation levels; additional conservation opportunities.

- 19. Mass. DPU 1048,** Boston Edison plant performance standards; Massachusetts Attorney General. May 1982.

Critique of company approach, data, and statistical analysis; description of comparative and absolute approaches to standard-setting; proposals for standards and reporting requirements.

- 20. DC PSC FC785,** Potomac Electric Power rate case; DC Peoples Counsel. July 1982.

Inter-class revenue allocations, including generation, transmission, and distribution plant classification; fuel and O&M classification; distribution and service allocators. Marginal cost estimation, including losses.

- 21. N.H. PSC DE 81-312,** Public Service of New Hampshire supply and demand; Conservation Law Foundation et al. October 1982.

Conservation program design, ratemaking, and effectiveness. Cost of power from Seabrook nuclear plant, including construction cost and duration, capacity factor, O&M, replacements, insurance, and decommissioning.

- 22. Mass. Division of Insurance,** hearing to fix and establish 1983 automobile insurance rates; Massachusetts Attorney General. October 1982.

Profit margin calculations, including methodology, interest rates, surplus flow, tax flows, tax rates, and risk premium.

- 23. Ill. CC 82-0026,** Commonwealth Edison rate case; Illinois Attorney General. October 1982.

Review of Cost-Benefit Analysis for nuclear plant. Nuclear cost parameters (construction cost, O&M, capital additions, useful life, capacity factor), risks, discount rates, evaluation techniques.

- 24. N.M. PSC 1794**, Public Service of New Mexico application for certification; New Mexico Attorney General. May 1983.

Review of Cost-Benefit Analysis for transmission line. Review of electricity price forecast, nuclear capacity factors, load forecast. Critique of company ratemaking proposals; development of alternative ratemaking proposal.

- 25. Conn. DPUC 830301**, United Illuminating rate case; Connecticut Consumers Counsel. June 17 1983.

Cost of Seabrook nuclear power plants, including construction cost and duration, capacity factor, O&M, capital additions, insurance and decommissioning.

- 26. Mass. DPU 1509**, Boston Edison plant performance standards; Massachusetts Attorney General. July 15 1983.

Critique of company approach and statistical analysis; regression model of nuclear capacity factor; proposals for standards and for standard-setting methodologies.

- 27. Mass. Division of Insurance**, hearing to fix and establish 1984 automobile-insurance rates; Massachusetts Attorney General. October 1983.

Profit margin calculations, including methodology, interest rates.

- 28. Conn. DPUC 83-07-15**, Connecticut Light and Power rate case; Alloy Foundry. October 3 1983.

Industrial rate design. Marginal and embedded costs; classification of generation, transmission, and distribution expenses; demand versus energy charges.

- 29. Mass. EFSC 83-24**, New England Electric System forecast of electric resources and requirements; Massachusetts Attorney General. November 14 1983, Rebuttal, February 2 1984.

Need for transmission line. Status of supply plan, especially Seabrook 2. Review of interconnection requirements. Analysis of cost-effectiveness for power transfer, line losses, generation assumptions.

- 30. Mich. PSC U-7775**, Detroit Edison Fuel Cost Recovery Plan; Public Interest Research Group in Michigan. February 21 1984.

Review of proposed performance target for new nuclear power plant. Formulation of alternative proposals.

- 31. Mass. DPU 84-25**, Western Massachusetts Electric Company rate case; Massachusetts Attorney General. April 6 1984.

Need for Millstone 3. Cost of completing and operating unit, cost-effectiveness compared to alternatives, and its effect on rates. Equity and incentive problems created by CWIP. Design of Millstone 3 phase-in proposals to protect ratepayers: limitation of base-rate treatment to fuel savings benefit of unit.

- 32. Mass. DPU 84-49 and 84-50, Fitchburg Gas & Electric financing case; Massachusetts Attorney General. April 13 1984.**

Cost of completing and operating Seabrook nuclear units. Probability of completing Seabrook 2. Recommendations regarding FG&E and MDPU actions with respect to Seabrook.

- 33. Mich. PSC U-7785, Consumers Power fuel-cost-recovery plan; Public Interest Research Group in Michigan. April 16 1984.**

Review of proposed performance targets for two existing and two new nuclear power plants. Formulation of alternative policy.

- 34. FERC ER81-749-000 and ER82-325-000, Montaup Electric rate cases; Massachusetts Attorney General. April 27 1984.**

Prudence of Montaup and Boston Edison in decisions regarding Pilgrim 2 construction: Montaup's decision to participate, the Utilities' failure to review their earlier analyses and assumptions, Montaup's failure to question Edison's decisions, and the utilities' delay in canceling the unit.

- 35. Maine PUC 84-113, Seabrook-1 investigation; Maine Public Advocate. September 13 1984.**

Cost of completing and operating Seabrook Unit 1. Probability of completing Seabrook 1. Comparison of Seabrook to alternatives. Rate effects. Recommendations regarding utility and PUC actions with respect to Seabrook.

- 36. Mass. DPU 84-145, Fitchburg Gas and Electric rate case; Massachusetts Attorney General. November 6 1984.**

Prudence of Fitchburg and Public Service of New Hampshire in decision regarding Seabrook 2 construction: FGE's decision to participate, the utilities' failure to review their earlier analyses and assumptions, FGE's failure to question PSNH's decisions, and utilities' delay in halting construction and canceling the unit. Review of literature, cost and schedule estimate histories, cost-benefit analyses, and financial feasibility.

- 37. Penn. PUC R-842651, Pennsylvania Power and Light rate case; Pennsylvania Consumer Advocate. November 1984.**

Need for Susquehanna 2. Cost of operating unit, power output, cost-effectiveness compared to alternatives, and its effect on rates. Design of phase-in and excess capacity proposals to protect ratepayers: limitation of base-rate treatment to fuel savings benefit of unit.

- 38. N.H. PSC 84-200**, Seabrook Unit-1 investigation; New Hampshire Consumer Advocate. November 1984.

Cost of completing and operating Seabrook Unit 1. Probability of completing Seabrook 1. Comparison of Seabrook to alternatives. Rate and financial effects.

- 39. Mass. Division of Insurance**, hearing to fix and establish 1986 automobile insurance rates; Massachusetts Attorney General. November 1984.

Profit-margin calculations, including methodology and implementation.

- 40. Mass. DPU 84-152**, Seabrook Unit 1 investigation; Massachusetts Attorney General. December 1984.

Cost of completing and operating Seabrook. Probability of completing Seabrook 1. Seabrook capacity factors.

- 41. Maine PUC 84-120**; Central Maine Power rate case; Maine PUC Staff. December 1984.

Prudence of Central Maine Power and Boston Edison in decisions regarding Pilgrim 2 construction: CMP's decision to participate, the utilities' failure to review their earlier analyses and assumptions, CMP's failure to question Edison's decisions, and the utilities' delay in canceling the unit. Prudence of CMP in the planning and investment in Sears Island nuclear and coal plants. Review of literature, cost and schedule estimate histories, cost-benefit analyses, and financial feasibility.

- 42. Maine PUC 84-113**, Seabrook 2 investigation; Maine PUC Staff. December 1984.

Prudence of Maine utilities and Public Service of New Hampshire in decisions regarding Seabrook 2 construction: decisions to participate and to increase ownership share, the utilities' failure to review their earlier analyses and assumptions, failure to question PSNH's decisions, and the utilities' delay in halting construction and canceling the unit. Review of literature, cost and schedule estimate histories, cost-benefit analyses, and financial feasibility.

- 43. Mass. DPU 1627**, Massachusetts Municipal Wholesale Electric Company financing case; Massachusetts Executive Office of Energy Resources. January 1985.

Cost of completing and operating Seabrook nuclear unit 1. Cost of conservation and other alternatives to completing Seabrook. Comparison of Seabrook to alternatives.

- 44. Vt. PSB 4936**, Millstone 3 costs and in-service date; Vermont Department of Public Service. January 1985.

Construction schedule and cost of completing Millstone Unit 3.

- 45. Mass. DPU 84-276**, rules governing rates for utility purchases of power from qualifying facilities; Massachusetts Attorney General. March 1985 and October 1985.

Institutional and technological advantages of Qualifying Facilities. Potential for QF development. Goals of QF rate design. Parity with other power sources. Security requirements. Projecting avoided costs. Capacity credits. Pricing options. Line loss corrections.

- 46. Mass. DPU 85-121**, investigation of the Reading Municipal Light Department; Wilmington (Mass.) Chamber of Commerce. November 1985.

Calculation on return on investment for municipal utility. Treatment of depreciation and debt for ratemaking. Geographical discrimination in street-lighting rates. Relative size of voluntary payments to Reading and other towns. Surplus and disinvestment. Revenue allocation.

- 47. Mass. Division of Insurance**, hearing to fix and establish 1986 automobile insurance rates; Massachusetts Attorney General and State Rating Bureau. November 1985.

Profit margin calculations, including methodology, implementation, modeling of investment balances, income, and return to shareholders.

- 48. N.M. PSC 1833**, Phase II; El Paso Electric rate case; New Mexico Attorney General. December 1985.

Nuclear decommissioning fund design. Internal and external funds; risk and return; fund accumulation, recommendations. Interim performance standard for Palo Verde nuclear plant.

- 49. Penn. PUC R-850152**, Philadelphia Electric rate case; Utility Users Committee and University of Pennsylvania. January 1986.

Limerick-1 rate effects. Capacity benefits, fuel savings, operating costs, capacity factors, and net benefits to ratepayers. Design of phase-in proposals.

- 50. Mass. DPU 85-270**, Western Massachusetts Electric rate case; Massachusetts Attorney General. March 1986.

Prudence of Northeast Utilities in generation planning related to Millstone 3 construction: decisions to start and continue construction, failure to reduce ownership share, failure to pursue alternatives. Review of industry literature, cost and schedule histories, and retrospective cost-benefit analyses.

- 51. Penn. PUC R-850290**, Philadelphia Electric auxiliary service rates; Albert Einstein Medical Center, University of Pennsylvania, and Amtrak. March 1986.

Review of utility proposals for supplementary and backup rates for small power producers and cogenerators. Load diversity, cost of peaking capacity, value of generation, price signals, and incentives. Formulation of alternative supplementary rate.

- 52. N.M. PSC 2004**, Public Service of New Mexico Palo Verde issues; New Mexico Attorney General. May 1986.

Recommendations for power-plant performance standards for Palo Verde nuclear units 1, 2, and 3.

- 53. Ill. CC 86-0325**, Iowa-Illinois Gas and Electric Co. rate investigation; Illinois Office of Public Counsel. August 1986.

Determination of excess capacity based on reliability and economic concerns. Identification of specific units associated with excess capacity. Required reserve margins.

- 54. N.M. PSC 2009**, El Paso Electric rate moderation program; New Mexico Attorney General. August 1986.

Prudence of EPE in generation planning related to Palo Verde nuclear construction, including failure to reduce ownership share and failure to pursue alternatives. Review of industry literature, cost and schedule histories, and retrospective cost-benefit analyses.

Recommendation for rate-base treatment; proposal of power plant performance standards.

- 55. City of Boston Public Improvements Commission**, transfer of Boston Edison district heating steam system to Boston Thermal Corporation; Boston Housing Authority. December 1986.

History and economics of steam system; possible motives of Boston Edison in seeking sale; problems facing Boston Thermal; information and assurances required prior to Commission approval of transfer.

- 56. Mass. Division of Insurance**, hearing to fix and establish 1987 automobile insurance rates; Massachusetts Attorney General and State Rating Bureau. December 1986 and January 1987.

Profit margin calculations, including methodology, implementation, derivation of cash flows, installment income, income tax status, and return to shareholders.

- 57. Mass. DPU 87-19**, petition for adjudication of development facilitation program; Hull (Mass.) Municipal Light Plant. January 1987.

Estimation of potential load growth; cost of generation, transmission, and distribution additions. Determination of hook-up charges. Development of residential load estimation procedure reflecting appliance ownership, dwelling size.

- 58. N.M. PSC 2004**, Public Service of New Mexico nuclear decommissioning fund; New Mexico Attorney General. February 1987.

Decommissioning cost and likely operating life of nuclear plants. Review of utility funding proposal. Development of alternative proposal. Ratemaking treatment.

- 59. Mass. DPU 86-280**, Western Massachusetts Electric rate case; Massachusetts Energy Office. March 1987.

Marginal cost rate design issues. Superiority of long-run marginal cost over short-run marginal cost as basis for rate design. Relationship of Consumer reaction, utility planning process, and regulatory structure to rate design approach. Implementation of short-run and long-run rate designs. Demand versus energy charges, economic development rates, spot pricing.

- 60. Mass. Division of Insurance 87-9**, 1987 Workers' Compensation rate filing; State Rating Bureau. May 1987.

Profit-margin calculations, including methodology, implementation, surplus requirements, investment income, and effects of 1986 Tax Reform Act.

- 61. Texas PUC 6184**, economic viability of South Texas Nuclear Plant #2; Committee for Consumer Rate Relief. August 1987.

Nuclear plant operating parameter projections; capacity factor, O&M, capital additions, decommissioning, useful life. STNP-2 cost and schedule projections. Potential for conservation.

- 62. Minn. PUC ER-015/GR-87-223**, Minnesota Power rate case; Minnesota Department of Public Service. August 1987.

Excess capacity on MP system; historical, current, and projected. Review of MP planning prudence prior to and during excess; efforts to sell capacity. Cost of excess capacity. Recommendations for ratemaking treatment.

- 63. Mass. Division of Insurance 87-27**, 1988 automobile insurance rates; Massachusetts Attorney General and State Rating Bureau. September 2 1987. Rebuttal October 1987.

Underwriting profit margins. Effect of 1986 Tax Reform Act. Biases in calculation of average margins.

- 64. Mass. DPU 88-19**, power Sales Contract from Riverside Steam and Electric to Western Massachusetts Electric; Riverside Steam and Electric. November 1987.

Comparison of risk from QF contract and utility avoided-cost sources. Risk of oil dependence. Discounting cash flows to reflect risk.

- 65. Mass. Division of Insurance 87-53**, 1987 Workers' Compensation rate refiling; State Rating Bureau. December 1987.

Profit-margin calculations including updating of data, compliance with Commissioner's order, treatment of surplus and risk, interest rate calculation, and investment tax rate calculation.

- 66. Mass. Division of Insurance**, 1987 and 1988 automobile insurance remand rates; Massachusetts Attorney General and State Rating Bureau. February 1988.

Underwriting profit margins. Provisions for income taxes on finance charges. Relationships between allowed and achieved margins, between statewide and nationwide data, and between profit allowances and cost projections.

- 67. Mass. DPU 86-36**, investigation into the pricing and ratemaking treatment to be afforded new electric generating facilities which are not qualifying facilities; Conservation Law Foundation. May 1988.

Cost recovery for utility conservation programs. Compensating for lost revenues. Utility incentive structures.

- 68. Mass. DPU 88-123**, petition of Riverside Steam & Electric; Riverside Steam and Electric Company. May 1988 and November 1988.

Estimation of avoided costs of Western Massachusetts Electric Company. Nuclear capacity factor projections and effects on avoided costs. Avoided cost of energy interchange and power plant life extensions. Differences between median and expected oil prices. Salvage value of cogeneration facility. Off-system energy purchase projections. Reconciliation of avoided cost projection.

- 69. Mass. DPU 88-67**, Boston Gas Company; Boston Housing Authority. June 1988.

Estimation of annual avoidable costs, 1988 to 2005, and levelized avoided costs. Determination of cost recovery and carrying costs for conservation investments. Standards for assessing conservation cost-effectiveness. Evaluation of cost-effectiveness of utility funding of proposed natural gas conservation measures.

- 70. R.I. PUC 1900**, Providence Water Supply Board tariff filing; Conservation Law Foundation, Audubon Society of Rhode Island, and League of Women Voters of Rhode Island. June 1988.

Estimation of avoidable water supply costs. Determination of costs of water conservation. Conservation cost-benefit analysis.

- 71. Mass. Division of Insurance 88-22**, 1989 automobile insurance rates; Massachusetts Attorney General and State Rating Bureau; Profit Issues, August 1988, supplemented August 1988; Losses and Expenses, September 1988.

Underwriting profit margins. Effects of 1986 Tax Reform Act. Taxation of common stocks. Lag in tax payments. Modeling risk and return over time. Treatment of finance charges. Comparison of projected and achieved investment returns.

72. **Vt. PSB 5270** Module 6, investigation into least-cost investments, energy efficiency, conservation, and the management of demand for energy; Conservation Law Foundation, Vermont Natural Resources Council, and Vermont Public Interest Research Group. September 1988.

Cost recovery for utility conservation programs. Compensation of utilities for revenue losses and timing differences. Incentive for utility participation.

73. **Vt. House of Representatives, Natural Resources Committee**, House Act 130; “Economic Analysis of Vermont Yankee Retirement”; Vermont Public Interest Research Group. February 1989.

Projection of capacity factors, operating and maintenance expense, capital additions, overhead, replacement power costs, and net costs of Vermont Yankee.

74. **Mass. DPU 88-67** Phase II, Boston Gas company conservation program and rate design; Boston Gas Company. March 1989.

Estimation of avoided gas cost; treatment of non-price factors; estimation of externalities; identification of cost-effective conservation.

75. **Vt. PSB 5270**, status conference on conservation and load management policy settlement; Central Vermont Public Service, Conservation Law Foundation, Vermont Natural Resources Council, Vermont Public Interest Research Group, and Vermont Department of Public Service. May 1989.

Cost-benefit test for utility conservation programs. Role of externalities. Cost recovery concepts and mechanisms. Resource allocations, cost allocations, and equity considerations. Guidelines for conservation preapproval mechanisms. Incentive mechanisms and recovery of lost revenues.

76. **Boston Housing Authority Court 05099**, Gallivan Boulevard Task Force vs. Boston Housing Authority, et al.; Boston Housing Authority. June 1989.

Effect of master-metering on consumption of natural gas and electricity. Legislative and regulatory mandates regarding conservation.

77. **Mass. DPU 89-100**, Boston Edison rates; Massachusetts Energy Office. June 1989.

Prudence of decision to spend \$400 million from 1986–88 to return Pilgrim nuclear plant to service. Projections of nuclear capacity factors, O&M, capital additions, and overhead. Review of decommissioning cost, tax effect of abandonment, replacement power cost, and plant useful life estimates. Requirements for prudence and used-and-useful analyses.

- 78. Mass. DPU 88-123**, petition of Riverside Steam and Electric Company; Riverside Steam and Electric. July 1989. Rebuttal, October 1989.

Reasonableness of Northeast Utilities' 1987 avoided cost estimates. Projections of nuclear capacity factors, economy purchases, and power plant operating life. Treatment of avoidable energy and capacity costs and of off-system sales. Expected versus reference fuel prices.

- 79. Mass. DPU 89-72**, Statewide Towing Association police-ordered towing rates; Massachusetts Automobile Rating Bureau. September 1989.

Review of study supporting proposed increase in towing rates. Critique of study sample and methodology. Comparison to competitive rates. Supply of towing services. Effects of joint products and joint sales on profitability of police-ordered towing. Joint testimony with I. Goodman.

- 80. Vt. PSB 5330**, application of Vermont utilities for approval of a firm power and energy contract with Hydro-Quebec; Conservation Law Foundation, Vermont Natural Resources Council, Vermont Public Interest Research Group. December 1989. Surrebuttal February 1990.

Analysis of a proposed 20-year power purchase. Comparison to efficiency investment. Critique of conservation potential analysis. Analysis of Vermont electric energy supply. Planning risk of large supply additions. Valuation of environmental externalities. Identification of possible improvements to proposed contract.

- 81. Mass. DPU 89-239**, inclusion of externalities in energy-supply planning, acquisition, and dispatch for Massachusetts utilities. Boston Gas Company. December 1989; April 1990; May 1990.

Critique of Division of Energy Resources report on externalities. Methodology for evaluating external costs. Proposed values for environmental and economic externalities of fuel supply and use.

- 82. California PUC**, incorporation of environmental externalities in utility planning and pricing; Coalition of Energy Efficient and Renewable Technologies. February 1990.

Approaches for valuing externalities for inclusion in setting power purchase rates. Effect of uncertainty on assessing externality values.

- 83. Ill. CC 90-0038**, proceeding to adopt a least-cost electric-energy plan for Commonwealth Edison Company; City of Chicago. May 25 1990. Joint rebuttal testimony with David Birr, August 1990.

Problems in Commonwealth Edison's approach to demand-side management. Potential for cost-effective conservation. Valuing externalities in least-cost planning.

- 84. Md. PSC 8278**, adequacy of Baltimore Gas & Electric's integrated resource plan; Maryland Office of People's Counsel. September 1990.

Rationale for demand-side management. BG&E's problems in approach to DSM planning. Potential for cost-effective conservation. Valuation of environmental externalities. Recommendations for short-term DSM program priorities.

- 85. Ind. URC**, integrated-resource-planning docket; Indiana Office of Utility Consumer Counselor. November 1990.

Integrated resource planning process and methodology, including externalities and screening tools. Incentives, screening, and evaluation of demand-side management. Potential of resource bidding in Indiana.

- 86. Mass. DPU 89-141, 90-73, 90-141, 90-194, 90-270**; preliminary review of utility treatment of environmental externalities in October qualifying-facilities filings; Boston Gas Company. November 1990.

Generic and specific problems in Massachusetts utilities' RFPs with regard to externality valuation requirements. Recommendations for corrections.

- 87. Mass. EFSC 90-12/90-12A**, adequacy of Boston Edison proposal to build combined-cycle plant; Conservation Law Foundation. December 1990.

Problems in Boston Edison's treatment of demand-side management, supply option analysis, and resource planning. Recommendations of mitigation options.

- 88. Maine PUC 90-286**, adequacy of conservation program of Bangor Hydro Electric; Penobscot River Coalition. February 1991.

Role of utility-sponsored DSM in least-cost planning. Bangor Hydro's potential for cost-effective conservation. Problems with Bangor Hydro's assumptions about customer investment in energy efficiency measures.

- 89. Va. SCC PUE900070**, commission investigation; Southern Environmental Law Center. March 1991.

Role of utilities in promoting energy efficiency. Least-cost planning objectives of and resource acquisition guidelines for DSM. Ratemaking considerations for DSM investments.

- 90. Mass. DPU 90-261-A**, economics and role of fuel-switching in the DSM program of the Massachusetts Electric Company; Boston Gas Company. April 1991.

Role of fuel-switching in utility DSM programs and specifically in Massachusetts Electric's. Establishing comparable avoided costs and comparison of electric and gas system costs. Updated externality values.

- 91. Private arbitration**, Massachusetts Refusetech Contractual Request for Adjustment to Service Fee; Massachusetts Refusetech. May 1991.

NEPCo rates for power purchases from the New England Solid Waste Compact plant. Fuel price and avoided cost projections vs. realities.

- 92. Vt. PSB 5491**, cost-effectiveness of Central Vermont's commitment to Hydro Quebec purchases; Conservation Law Foundation. July 1991.

Changes in load forecasts and resale markets since approval of HQ purchases. Effect of HQ purchase on DSM.

- 93. S.C. PSC 91-216-E**, cost recovery of Duke Power's DSM expenditures; South Carolina Department of Consumer Affairs. Direct, September 13 1991; Surrebuttal October 1991.

Problems with conservation plans of Duke Power, including load building, cream skimming, and inappropriate rate designs.

- 94. Md. PSC 8241 Phase II**, review of Baltimore Gas & Electric's avoided costs; Maryland Office of People's Counsel. September 1991.

Development of direct avoided costs for DSM. Problems with BG&E's avoided costs and DSM screening. Incorporation of environmental externalities.

- 95. Bucksport (Maine) Planning Board**, AES/Harriman Cove shoreland zoning application; Conservation Law Foundation and Natural Resources Council of Maine. October 1991.

New England's power surplus. Costs of bringing AES/Harriman Cove on line to back out existing generation. Alternatives.

- 96. Mass. DPU 91-131**, update of externalities values adopted in Docket 89-239; Boston Gas Company. October 1991. Rebuttal, December 1991.

Updates on pollutant externality values. Addition of values for chlorofluorocarbons, air toxics, thermal pollution, and oil import premium. Review of state regulatory actions regarding externalities.

- 97. Fla. PSC 910759**, petition of Florida Power Corporation for determination of need for proposed electrical power plant and related facilities; Floridians for Responsible Utility Growth. October 1991.

Florida Power's obligation to pursue integrated resource planning and failure to establish need for proposed facility. Methods to increase scope and scale of demand-side investment.

- 98. Fla. PSC 910833-EI**, petition of Tampa Electric Company for a determination of need for proposed electrical power plant and related facilities; Floridians for Responsible Utility Growth. October 1991.
- Obligation to pursue integrated resource planning, failure to establish need for proposed facility. Methods to increase scope and scale of demand-side investment.
- 99. Penn. PUC I-900005, R-901880**; investigation into demand-side management by electric utilities; Pennsylvania Energy Office. January 1992.
- Appropriate cost recovery mechanism for Pennsylvania utilities. Purpose and scope of direct cost recovery, lost revenue recovery, and incentives.
- 100. S.C. PSC 91-606-E**, petition of South Carolina Electric and Gas for a certificate of public convenience and necessity for a coal-fired plant; South Carolina Department of Consumer Affairs. January 1992.
- Justification of plant certification under integrated resource planning. Failures in SCE&G's DSM planning and company potential for demand-side savings.
- 101. Mass. DPU 92-92**, adequacy of Boston Edison's street-lighting options; Town of Lexington. June 1992.
- Efficiency and quality of street-lighting options. Boston Edison's treatment of high-quality street lighting. Corrected rate proposal for the Daylux lamp. Ownership of public street lighting.
- 102. S.C. PSC 92-208-E**, integrated-resource plan of Duke Power Company; South Carolina Department of Consumer Affairs. August 1992.
- Problems with Duke Power's DSM screening process, estimation of avoided cost, DSM program design, and integration of demand-side and supply-side planning.
- 103. N.C. UC E-100 Sub 64**, integrated-resource-planning docket; Southern Environmental Law Center. September 1992.
- General principles of integrated resource planning, DSM screening, and program design. Review of the IRPs of Duke Power Company, Carolina Power & Light Company, and North Carolina Power.
- 104. Ont. EAB Ontario Hydro Demand/Supply Plan Hearings, *Environmental Externalities Valuation and Ontario Hydro's Resource Planning*** (3 vols.); Coalition of Environmental Groups. October 1992.
- Valuation of environmental externalities from fossil fuel combustion and the nuclear fuel cycle. Application to Ontario Hydro's supply and demand planning.

- 105. Texas PUC 110000**, application of Houston Lighting and Power company for a certificate of convenience and necessity for the DuPont Project; Destec Energy, Inc. September 1992.

Valuation of environmental externalities from fossil fuel combustion and the application to the evaluation of proposed cogeneration facility.

- 106. Maine BEP**, in the matter of the Basin Mills Hydroelectric Project application; Conservation Intervenors. November 1992.

Economic and environmental effects of generation by proposed hydro-electric project.

- 107. Md. PSC 8473**, review of the power sales agreement of Baltimore Gas and Electric with AES Northside; Maryland Office of People's Counsel. November 1992.

Non-price scoring and unquantified benefits; DSM potential as alternative; environmental costs; cost and benefit estimates.

- 108. N.C. UC E-100 Sub 64**, analysis and investigation of least cost integrated resource planning in North Carolina; Southern Environmental Law Center. November 1992.

Demand-side management cost recovery and incentive mechanisms.

- 109. S.C. PSC 92-209-E**, in re Carolina Power & Light Company; South Carolina Department of Consumer Affairs. November 1992.

Demand-side-management planning: objectives, process, cost-effectiveness test, comprehensiveness, lost opportunities. Deficiencies in CP&L's portfolio. Need for economic evaluation of load building.

- 110 Fla. DER** hearings on the Power Plant Siting Act; Legal Environmental Assistance Foundation. December 1992.

Externality valuation and application in power-plant siting. DSM potential, cost-benefit test, and program designs.

- 111. Md. PSC 8487**, Baltimore Gas and Electric Company electric rate case. Direct January 1993; rebuttal February 1993.

Class allocation of production plant and O&M; transmission, distribution, and general plant; administrative and general expenses. Marginal cost and rate design.

- 112. Md. PSC 8179**, Approval of amendment to Potomac Edison purchase agreement with AES Warrior Run; Maryland Office of People's Counsel. January 29 1993.

Economic analysis of proposed coal-fired cogeneration facility.

- 113. Mich. PSC U-10102**, Detroit Edison rate case; Michigan United Conservation Clubs. February 17 1993.
- Least-cost planning; energy efficiency planning, potential, screening, avoided costs, cost recovery, and shareholder incentives.
- 114. Ohio PUC 91-635-EL-FOR, 92-312-EL-FOR, 92-1172-EL-ECP**; Cincinnati Gas and Electric demand-management programs; City of Cincinnati. April 1993.
- Demand-side-management planning, program designs, potential savings, and avoided costs.
- 115. Mich. PSC U-10335**, Consumers Power rate case; Michigan United Conservation Clubs. October 1993.
- Least-cost planning; energy efficiency planning, potential, screening, avoided costs, cost recovery, and shareholder incentives.
- 116. Ill. CC 92-0268**, electric-energy plan for Commonwealth Edison; City of Chicago. Direct, February 1 1994; rebuttal, September 1994.
- Cost-effectiveness screening of demand-side management programs and measures; estimates by Commonwealth Edison of costs avoided by DSM and of future cost, capacity, and performance of supply resources.
- 117. FERC 2422 et al.**, application of James River–New Hampshire Electric, Public Service of New Hampshire, for licensing of hydro power; Conservation Law Foundation; 1993.
- Cost-effective energy conservation available to the Public Service of New Hampshire; power-supply options; affidavit.
- 118. Vt. PSB 5270-CV-1,-3, and 5686**; Central Vermont Public Service fuel-switching and DSM program design, on behalf of the Vermont Department of Public Service. Direct, April 1994; rebuttal, June 1994.
- Avoided costs and screening of controlled water-heating measures; risk, rate impacts, participant costs, externalities, space- and water-heating load, benefit-cost tests.
- 119. Fla. PSC 930548-EG–930551-EG**, conservation goals for Florida electric utilities; Legal Environmental Assistance Foundation, Inc. April 1994.
- Integrated resource planning, avoided costs, rate impacts, analysis of conservation goals of Florida electric utilities.
- 120. Vt. PSB 5724**, Central Vermont Public Service Corporation rate request; Vermont Department of Public Service. Joint surrebuttal testimony with John Plunkett. August 1994.
- Costs avoided by DSM programs; Costs and benefits of deferring DSM programs.

- 121. Mass. DPU 94-49**, Boston Edison integrated-resource-management plan; Massachusetts Attorney General. August 1994.
- Least-cost planning, modeling, and treatment of risk.
- 122. Mich. PSC U-10554**, Consumers Power Company DSM program and incentive; Michigan Conservation Clubs. November 1994.
- Critique of proposed reductions in DSM programs; discussion of appropriate measurements of cost-effectiveness, role of DSM in competitive power markets.
- 123. Mich. PSC U-10702**, Detroit Edison Company cost recovery, on behalf of the Residential Ratepayers Consortium. December 1994.
- Impact of proposed changes to DSM plan on energy costs and power-supply-cost-recovery charges. Critique of proposed DSM changes; discussion of appropriate measurements of cost-effectiveness, role of DSM in competitive power markets.
- 124. N.J. BRC EM92030359**, environmental costs of proposed cogeneration; Freehold Cogeneration Associates. November 1994.
- Comparison of potential externalities from the Freehold cogeneration project with that from three coal technologies; support for the study “The Externalities of Four Power Plants.”
- 125. Mich. PSC U-10671**, Detroit Edison Company DSM programs; Michigan United Conservation Clubs. January 1995.
- Critique of proposal to scale back DSM efforts in light of potential for competition. Loss of savings, increase of customer costs, and decrease of competitiveness. Discussion of appropriate measurements of cost-effectiveness, role of DSM in competitive power markets.
- 126. Mich. PSC U-10710**, power-supply-cost-recovery plan of Consumers Power Company; Residential Ratepayers Consortium. January 1995.
- Impact of proposed changes to DSM plan on energy costs and power-supply-cost-recovery charges. Critique of proposed DSM changes; discussion of appropriate measurements of cost-effectiveness, role of DSM in competitive power markets.
- 127. FERC 2458 and 2572**, Bowater–Great Northern Paper hydropower licensing; Conservation Law Foundation. February 1995.
- Comments on draft environmental impact statement relating to new licenses for two hydropower projects in Maine. Applicant has not adequately considered how energy conservation can replace energy lost due to habitat-protection or -enhancement measures.

- 128. N.C. UC E-100 Sub 74**, Duke Power and Carolina Power & Light avoided costs; Hydro-Electric–Power Producer’s Group. February 1995.
- Critique and proposed revision of avoided costs offered to small hydro-power producers by Duke Power and Carolina Power and Light.
- 129. New Orleans City Council UD-92-2A and -2B**, least-cost IRP for New Orleans Public Service and Louisiana Power & Light; Alliance for Affordable Energy. Direct, February 1995; rebuttal, April 1995.
- Critique of proposal to scale back DSM efforts in light of potential competition.
- 130. D.C. PSC FC917 II**, prudence of DSM expenditures of Potomac Electric Power Company; Potomac Electric Power Company. Rebuttal testimony, February 1995.
- Prudence of utility DSM investment; prudence standards for DSM programs of the Potomac Electric Power Company.
- 131. Ont. Energy Board EBRO 490**, DSM cost recovery and lost-revenue–adjustment mechanism for Consumers Gas Company; Green Energy Coalition. April 1995.
- Demand-side-management cost recovery. Lost-revenue–adjustment mechanism for Consumers Gas Company.
- 132. New Orleans City Council CD-85-1**, New Orleans Public Service rate increase; Alliance for Affordable Energy. Rebuttal, May 1995.
- Allocation of costs and benefits to rate classes.
- 133. Mass. DPU Docket DPU-95-40**, Mass. Electric cost-allocation; Massachusetts Attorney General. June 1995.
- Allocation of costs to rate classes. Critique of cost-of-service study. Implications for industry restructuring.
- 134. Md. PSC 8697**, Baltimore Gas & Electric gas rate increase; Maryland Office of People’s Counsel. July 1995.
- Rate design, cost-of-service study, and revenue allocation.
- 135. N.C. UC E-2 Sub 669**. December 1995.
- Need for new capacity. Energy-conservation potential and model programs.
- 136. Arizona CC U-1933-95-317**, Tucson Electric Power rate increase; Residential Utility Consumer Office. January 1996.
- Review of proposed rate settlement. Used-and-usefulness of plant. Rate design. DSM potential.

- 137. Ohio PUC 95-203-EL-FOR; Campaign for an Energy-Efficient Ohio. February 1996**

Long-term forecast of Cincinnati Gas and Electric Company, especially its DSM portfolio. Opportunities for further cost-effective DSM savings. Tests of cost effectiveness. Role of DSM in light of industry restructuring; alternatives to traditional utility DSM.

- 138 Vt. PSB 5835, Central Vermont Public Service Company rates; Vermont Department of Public Service. February 1996.**

Design of load-management rates of Central Vermont Public Service Company.

- 139. Md. PSC 8720, Washington Gas Light DSM; Maryland Office of People's Counsel. May 1996.**

Avoided costs of Washington Gas Light Company; integrated least-cost planning.

- 140. Mass. DPU 96-100, Massachusetts Utilities' Stranded Costs; Massachusetts Attorney General. Oral testimony in support of "estimation of Market Value, Stranded Investment, and Restructuring Gains for Major Massachusetts Utilities," July 1996.**

Stranded costs. Calculation of loss or gain. Valuation of utility assets.

- 141. Mass. DPU 96-70, Essex County Gas Company rates; Massachusetts Attorney General. July 1996.**

Market-based allocation of gas-supply costs of Essex County Gas Company.

- 142. Mass. DPU 96-60, Fall River Gas Company rates; Massachusetts Attorney General. Direct, July 1996; surrebuttal, August 1996.**

Market-based allocation of gas-supply costs of Fall River Gas Company.

- 143. Md. PSC 8725, Maryland electric-utilities merger; Maryland Office of People's Counsel. July 1996.**

Proposed merger of Baltimore Gas & Electric Company, Potomac Electric Power Company, and Constellation Energy. Cost allocation of merger benefits and rate reductions.

- 144. N.H. PUC DR 96-150, Public Service Company of New Hampshire stranded costs; New Hampshire Office of Consumer Advocate. December 1996.**

Market price of capacity and energy; value of generation plant; restructuring gain and stranded investment; legal status of PSNH acquisition premium; interim stranded-cost charges.

- 145. Ont. Energy Board EBRO 495**, LRAM and shared-savings incentive for DSM performance of Consumers Gas; Green Energy Coalition. March 1997.
- LRAM and incentive mechanisms in rates for the Consumers Gas Company.
- 146. New York PSC 96-E-0897**, Consolidated Edison restructuring plan; City of New York. April 1997.
- Electric-utility competition and restructuring; critique of proposed settlement of Consolidated Edison Company; stranded costs; market power; rates; market access.
- 147. Vt. PSB 5980**, proposed statewide energy plan; Vermont Department of Public Service. Direct, August 1997; rebuttal, December 1997.
- Justification for and estimation of statewide avoided costs; guidelines for distributed IRP.
- 148. Mass. DPU 96-23**, Boston Edison restructuring settlement; Utility Workers Union of America. September 1997.
- Performance incentives proposed for the Boston Edison company.
- 149. Vt. PSB 5983**, Green Mountain Power rate increase; Vermont Department of Public Service. Direct, October 1997; rebuttal, December 1997.
- In three separate pieces of prefiled testimony, addressed the Green Mountain Power Corporation's (1) distributed-utility-planning efforts, (2) avoided costs, and (3) prudence of decisions relating to a power purchase from Hydro-Quebec.
- 150. Mass. DPU 97-63**, Boston Edison proposed reorganization; Utility Workers Union of America. October 1997.
- Increased costs and risks to ratepayers and shareholders from proposed reorganization; risks of diversification; diversion of capital from regulated to unregulated affiliates; reduction in Commission authority.
- 151. Mass. DTE 97-111**, Commonwealth Energy proposed restructuring; Cape Cod Light Compact. Joint testimony with Jonathan Wallach, January 1998.
- Critique of proposed restructuring plan filed to satisfy requirements of the electric-utility restructuring act of 1997. Failure of the plan to foster competition and promote the public interest.
- 152. N.H. PUC Docket DR 97-241**, Connecticut Valley Electric fuel and purchased-power adjustments; City of Claremont, N.H. February 1998.
- Prudence of continued power purchase from affiliate; market cost of power; prudence disallowances and cost-of-service ratemaking.
- 153. Md. PSC 8774**, APS-DQE merger; Maryland Office of People's Counsel. February 1998.

Proposed power-supply arrangements between APS's potential operating subsidiaries; power-supply savings; market power.

- 154. Vt. PSB 6018**, Central Vermont Public Service Co. rate increase; Vermont Department of Public Service. February 1998.

Prudence of decisions relating to a power purchase from Hydro-Quebec. Reasonableness of avoided-cost estimates. Quality of DU planning.

- 155. Maine PUC 97-580**, Central Maine Power restructuring and rates; Maine Office of Public Advocate. May 1998; Surrebuttal, August 1998.

Determination of stranded costs; gains from sales of fossil, hydro, and biomass plant; treatment of deferred taxes; incentives for stranded-cost mitigation; rate design.

- 156. Mass. DTE 98-89**, purchase of Boston Edison municipal street lighting; Towns of Lexington and Acton. Affidavit, August 1998.

Valuation of municipal streetlighting; depreciation; applicability of unbundled rate.

- 157. Vt. PSB 6107**, Green Mountain Power rate increase; Vermont Department of Public Service. Direct, September 1998; Surrebuttal drafted but not filed, November 2000.

Prudence of decisions relating to a power purchase from Hydro-Quebec. Least-cost planning and prudence. Quality of DU planning.

- 158. Mass. DTE 97-120**, Western Massachusetts Electric Company proposed restructuring; Massachusetts Attorney General. Joint testimony with Jonathan Wallach, October 1998. Joint surrebuttal with Jonathan Wallach, January 1999.

Market value of the three Millstone nuclear units under varying assumptions of plant performance and market prices. Independent forecast of wholesale market prices. Value of Pilgrim and TMI-1 asset sales.

- 159. Md. PSC 8794 and 8804**, BG&E restructuring and rates; Maryland Office of People's Counsel. Direct, December 1998; rebuttal, March 1999.

Implementation of restructuring. Valuation of generation assets from comparable-sales and cash-flow analyses. Determination of stranded cost or gain.

- 160. Md. PSC 8795**; Delmarva Power & Light restructuring and rates; Maryland Office of People's Counsel. December 1998.

Implementation of restructuring. Valuation of generation assets and purchases from comparable-sales and cash-flow analyses. Determination of stranded cost or gain.

- 161. Md. PSC 8797**, Potomac Edison Company restructuring and rates; Maryland Office of People's Counsel. Direct, January 1999; rebuttal, March 1999.

Implementation of restructuring. Valuation of generation assets and purchases from comparable-sales and cash-flow analyses. Determination of stranded cost or gain.

- 162. Conn. DPUC 99-02-05**, Connecticut Light and Power Company stranded costs; Connecticut Office of Consumer Counsel. April 1999.
- Projections of market price. Valuation of purchase agreements and nuclear and non-nuclear assets from comparable-sales and cash-flow analyses.
- 163. Conn. DPUC 99-03-04**, United Illuminating Company stranded costs; Connecticut Office of Consumer Counsel. April 1999.
- Projections of market price. Valuation of purchase agreements and nuclear assets from comparable-sales and cash-flow analyses.
- 164. Wash. UTC UE-981627**, PacifiCorp–Scottish Power merger, Office of the Attorney General. June 1999.
- Review of proposed performance standards and valuation of performance. Review of proposed low-income assistance.
- 165. Utah PSC 98-2035-04**, PacifiCorp–Scottish Power merger, Utah Committee of Consumer Services. June 1999.
- Review of proposed performance standards and valuation of performance.
- 166. Conn. DPUC 99-03-35**, United Illuminating Company proposed standard offer; Connecticut Office of Consumer Counsel. July 1999.
- Design of standard offer by rate class. Design of price adjustments to preserve rate decrease. Market valuations of nuclear plants. Short-term stranded cost
- 167. Conn. DPUC 99-03-36**, Connecticut Light and Power Company proposed standard offer; Connecticut Office of Consumer Counsel. Direct, July 1999; supplemental, July 1999.
- Design of standard offer by rate class. Design of price adjustments to preserve rate decrease. Market valuations of nuclear plants. Short-term stranded cost.
- 168. W. Va. PSC 98-0452-E-GI**, electric-industry restructuring, West Virginia Consumer Advocate. July 1999.
- Market value of generating assets of, and restructuring gain for, Potomac Edison, Monongahela Power, and Appalachian Power. Comparable-sales and cash-flow analyses.
- 169. Ont. Energy Board RP-1999-0034**, Ontario performance-based rates; Green Energy Coalition. September 1999.
- Rate design. Recovery of demand-side-management costs under PBR. Incremental costs.

- 170. Conn. DPUC 99-08-01**, standards for utility restructuring; Connecticut Office of Consumer Counsel. Direct, November 1999; supplemental, January 2000.

Appropriate role of regulation. T&D reliability and service quality. Performance standards and customer guarantees. Assessing generation adequacy in a competitive market.

- 171. Conn. Superior Court CV 99-049-7239**, Connecticut Light and Power Company stranded costs; Connecticut Office of Consumer Counsel. Affidavit, December 1999.

Errors of the Conn. DPUC in deriving discounted-cash-flow valuations for Millstone and Seabrook, and in setting minimum bid price.

- 172. Conn. Superior Court CV 99-049-7597**, United Illuminating Company stranded costs; Connecticut Office of Consumer Counsel. December 1999.

Errors of the Conn. DPUC, in its discounted-cash-flow computations, in selecting performance assumptions for Seabrook, and in setting minimum bid price.

- 173. Ont. Energy Board RP-1999-0044**, Ontario Hydro transmission-cost allocation and rate design; Green Energy Coalition. January 2000.

Cost allocation and rate design. Net vs. gross load billing. Export and wheeling-through transactions. Environmental implications of utility proposals.

- 174. Utah PSC 99-2035-03**, PacifiCorp Sale of Centralia plant, mine, and related facilities; Utah Committee of Consumer Services. January 2000.

Prudence of sale and management of auction. Benefits to ratepayers. Allocation and rate treatment of gain.

- 175. Conn. DPUC 99-09-12**, Nuclear Divestiture by Connecticut Light & Power and United Illuminating; Connecticut Office of Consumer Counsel. January 2000.

Market for nuclear assets. Optimal structure of auctions. Value of minority rights. Timing of divestiture.

- 176. Ont. Energy Board RP-1999-0017**, Union Gas PBR proposal; Green Energy Coalition. March 2000.

Lost-revenue-adjustment and shared-savings incentive mechanisms for Union Gas DSM programs. Standards for review of targets and achievements, computation of lost revenues. Need for DSM expenditure true-up mechanism.

- 177. N.Y. PSC 99-S-1621**, Consolidated Edison steam rates; City of New York. April 2000.

Allocation of costs of former cogeneration plants, and of net proceeds of asset sale. Economic justification for steam-supply plans. Depreciation rates. Weather normalization and other rate adjustments.

- 178. Maine PUC 99-666**, Central Maine Power alternative rate plan; Maine Public Advocate. Direct, May 2000; Surrebuttal, August 2000.

Likely merger savings. Savings and rate reductions from recent mergers. Implications for rates.

- 179. Mass. EFSB 97-4**, Massachusetts Municipal Wholesale Electric Company gas-pipeline proposal; Town of Wilbraham, Mass. June 2000.

Economic justification for natural-gas pipeline. Role and jurisdiction of EFSB.

- 180. Conn. DPUC 99-09-03**; Connecticut Natural Gas Corporation merger and rate plan; Connecticut office of Consumer Counsel. September 2000.

Performance-based ratemaking in light of mergers. Allocation of savings from merger. Earnings-sharing mechanism.

- 181. Conn. DPUC 99-09-12RE01**, Proposed Millstone sale; Connecticut Office of Consumer Counsel. November 2000.

Requirements for review of auction of generation assets. Allocation of proceeds between units.

- 182. Mass. DTE 01-25**, Purchase of streetlights from Commonwealth Electric; Cape Light Compact. January 2001

Municipal purchase of streetlights; Calculation of purchase price under state law; Determination of accumulated depreciation by asset.

- 183. Conn. DPUC 00-12-01 and 99-09-12RE03**, Connecticut Light & Power rate design and standard offer; Connecticut Office of Consumer Counsel. March 2001.

Rate design and standard offer under restructuring law; Future rate impacts; Transition to restructured regime; Comparison of Connecticut and California restructuring challenges.

- 184. Vt. PSB 6460 & 6120**, Central Vermont Public Service rates; Vermont Department of Public Service. Direct, March 2001; Surrebuttal, April 2001.

Review of decision in early 1990s to commit to long-term uneconomic purchase from Hydro Québec. Calculation of present damages from imprudence.

- 185. N.J. BPU EM00020106**, Atlantic City Electric Company sale of fossil plants; New Jersey Ratepayer Advocate. Affidavit, May 2001.

Comparison of power-supply contracts. Comparison of plant costs to replacement power cost. Allocation of sales proceeds between subsidiaries.

- 186. N.J. BPU GM00080564**, Public Service Electric and Gas transfer of gas supply contracts; New Jersey Ratepayer Advocate. Direct, May 2001.

Transfer of gas transportation contracts to unregulated affiliate. Potential for market power in wholesale gas supply and electric generation. Importance of reliable gas supply. Valuation of contracts. Effect of proposed requirements contract on rates. Regulation and design of standard-offer service.

- 187. Conn. DPUC 99-04-18 Phase 3, 99-09-03 Phase 2**; Southern Connecticut Natural Gas and Connecticut Natural Gas rates and charges; Connecticut Office of Consumer Counsel. Direct, June 2001; supplemental, July 2001.

Identifying, quantifying, and allocating merger-related gas-supply savings between ratepayers and shareholders. Establishing baselines. Allocations between affiliates. Unaccounted-for gas.

- 188. N.J. BPU EX01050303**, New Jersey electric companies' procurement of basic supply; New Jersey Ratepayer Advocate. August 2001.

Review of proposed statewide auction for purchase of power requirements. Market power. Risks to ratepayers of proposed auction.

- 189. N.Y. PSC 00-E-1208**, Consolidated Edison rates; City of New York. October 2001.

Geographic allocation of stranded costs. Locational and postage-stamp rates. Causation of stranded costs. Relationship between market prices for power and stranded costs.

- 190. Mass. DTE 01-56**, Berkshire Gas Company; Massachusetts Attorney General. October 2001.

Allocation of gas costs by load shape and season. Competition and cost allocation.

- 191. N.J. BPU EM00020106**, Atlantic City Electric proposed sale of fossil plants; New Jersey Ratepayer Advocate. December 2001.

Current market value of generating plants vs. proposed purchase price.

- 192. Vt. PSB 6545**, Vermont Yankee proposed sale; Vermont Department of Public Service. January 2002.

Comparison of sales price to other nuclear sales. Evaluation of auction design and implementation. Review of auction manager's valuation of bids.

- 193. Conn. Siting Council 217**, Connecticut Light & Power proposed transmission line from Plumtree to Norwalk; Connecticut Office of Consumer Counsel. March 2002.

Nature of transmission problems. Potential for conservation and distributed resources to defer, reduce or avoid transmission investment. CL&P transmission planning process. Joint testimony with John Plunkett.

- 194. Vt. PSB 6596**, Citizens Utilities rates; Vermont Department of Public Service. Direct, March 2002; rebuttal, May 2002.

Review of 1991 decision to commit to long-term uneconomic purchase from Hydro Québec. Alternatives; role of transmission constraints. Calculation of present damages from imprudence.

- 195. Conn. DPUC 01-10-10**, United Illuminating rate plan; Connecticut Office of Consumer Counsel. April 2002

Allocation of excess earnings between shareholders and ratepayers. Asymmetry in treatment of over- and under-earning. Accelerated amortization of stranded costs. Effects of power-supply developments on ratepayer risks. Effect of proposed rate plan on utility risks and required return.

- 196. Conn. DPUC 01-12-13RE01**, Seabrook proposed sale; Connecticut Office of Consumer Counsel. July 2002

Comparison of sales price to other nuclear sales. Evaluation of auction design and implementation. Assessment of valuation of purchased-power contracts.

- 197. Ont. Energy Board RP-2002-0120**, review of transmission-system code; Green Energy Coalition. October 2002.

Cost allocation. Transmission charges. Societal cost-effectiveness. Environmental externalities.

- 198. N.J. BPU ER02080507**, Jersey Central Power & Light rates; N.J. Division of the Ratepayer Advocate. Phase I December 2002; Phase II (oral) July 2003.

Prudence of procurement of electrical supply. Documentation of procurement decisions. Comparison of costs for subsidiaries with fixed versus flow-through cost recovery.

- 199. Conn. DPUC 03-07-02**, CL&P rates; AARP. October 2003

Proposed distribution investments, including prudence of prior management of distribution system and utility's failure to make investments previously funded in rates. Cost controls. Application of rate cap. Legislative intent.

- 200. Conn. DPUC 03-07-01**, CL&P transitional standard offer; AARP. November 2003.

Application of rate cap. Legislative intent.

- 201. Vt. PSB 6596**, Vermont Electric Power Company and Green Mountain Power Northwest Reliability transmission plan; Conservation Law Foundation. December 2003.

Inadequacies of proposed transmission plan. Failure of to perform least-cost planning. Distributed resources.

- 202. Ohio PUC 03-2144-EL-ATA**, Ohio Edison, Cleveland Electric, and Toledo Edison Cos. rates and transition charges; Green Mountain Energy Co. February 2004.

Pricing of standard-offer service in competitive markets. Critique of anticompetitive features of proposed standard-offer supply, including non-bypassable charges.

- 203. N.Y. PSC 03-G-1671 & 03-S-1672**, Consolidated Edison company steam and gas rates; City of New York. Direct March 2004; rebuttal April 2004; settlement June 2004.

Prudence and cost allocation for the East River Repowering Project. Gas and steam energy conservation. Opportunities for cogeneration at existing steam plants.

- 204. N.Y. PSC 04-E-0572**, Consolidated Edison rates and performance; City of New York. Direct, September 2004; rebuttal, October 2004.

Consolidated Edison's role in promoting adequate supply and demand resources. Integrated resource and T&D planning. Performance-based ratemaking and streetlighting.

- 205. Ont. Energy Board RP 2004-0188**, cost recovery and DSM for Ontario electric-distribution utilities; Green Energy Coalition. Exhibit, December 2004.

Differences in ratemaking requirements for customer-side conservation and demand management versus utility-side efficiency improvements. Recovery of lost revenues or incentives. Reconciliation mechanism.

- 206. Mass. DTE 04-65**, Cambridge Electric Light Co. streetlighting; City of Cambridge. Direct, October 2004; supplemental, January 2005.

Calculation of purchase price of street lights by the City of Cambridge.

- 207. N.Y. PSC 04-W-1221**, rates, rules, charges, and regulations of United Water New Rochelle; Town of Eastchester and City of New Rochelle. Direct, February 2005.

Size and financing of proposed interconnection. Rate design. Water-mains replacement and related cost recovery. Lost and unaccounted-for water.

- 208. N.Y. PSC 05-M-0090**, system-benefits charge; City of New York. Comments, March 2005.

Assessment and scope of, and potential for, New York system-benefits charges.

- 209. Md. PSC 9036**, Baltimore Gas & Electric rates; Maryland Office of People's Counsel. Direct, August 2005.

Allocation of costs. Design of rates. Interruptible and firm rates.

- 210. B.C. UC 3698388**, British Columbia Hydro resource-acquisition plan; British Columbia Sustainable Energy Association and Sierra Club of Canada BC Chapter. September 2005.

Renewable energy and DSM. Economic tests of cost-effectiveness. Costs avoided by DSM.

- 211. Conn. DPUC 05-07-18**, financial effect of long-term power contracts; Connecticut Office of Consumer Counsel. September 2005.

Assessment of effect of DSM, distributed generation, and capacity purchases on financial condition of utilities.

- 212. Conn. DPUC 03-07-01RE03 & 03-07-15RE02**, incentives for power procurement; Connecticut Office of Consumer Counsel. Direct, September 2005; Additional, April 2006.

Utility obligations for generation procurement. Application of standards for utility incentives. Identification and quantification of effects of timing, load characteristics, and product definition.

- 213. Conn. DPUC Docket 05-10-03**, Connecticut L&P; time-of-use, interruptible, and seasonal rates; Connecticut Office of Consumer Counsel. Direct and Supplemental Testimony February 2006.

Seasonal and time-of-use differentiation of generation, congestion, transmission and distribution costs; fixed and variable peak-period timing; identification of pricing seasons and seasonal peak periods; cost-effectiveness of time-of-use rates.

- 214. Ont. Energy Board Case EB-2005-0520**, Union Gas rates; School Energy Coalition. Evidence, April 2006.

Rate design related to splitting commercial rate class into two classes. New break point, cost allocation, customer charges, commodity rate blocks.

- 215. Ont. Energy Board EB-2006-0021**, Natural-gas demand-side-management generic issues proceeding; School Energy Coalition. Evidence, June 2006.

Multi-year planning and budgeting; lost-revenue adjustment mechanism; determining savings for incentives; oversight; program screening.

- 216. Ind. URC 42943 and 43046**, Vectren Energy DSM proceedings; Citizens Action Coalition. Direct, June 2006.

Rate decoupling and energy-efficiency goals.

- 217. Penn. PUC 00061346**, Duquesne Lighting; Real-time pricing; PennFuture. Direct, July 2006; surrebuttal August 2006.

Real-time and time-dependent pricing; benefits of time-dependent pricing; appropriate metering technology; real-time rate design and customer information

- 218. Penn. PUC R-00061366 et al.,** rate-transition-plan proceedings of Metropolitan Edison and Pennsylvania Electric; Real-time pricing; PennFuture. Direct, July 2006; surrebuttal August 2006.

Real-time and time-dependent pricing; appropriate metering technology; real-time rate design and customer information.

- 219. Conn. DPUC 06-01-08,** Connecticut L&P procurement of power for standard service and last-resort service; Connecticut Office of Consumer Counsel. Reports and technical hearings quarterly since September 2006 to October 2013.

Conduct of auction; review of bids; comparison to market prices; selection of winning bidders.

- 220. Conn. DPUC 06-01-08,** United Illuminating procurement of power for standard service and last-resort service; Connecticut Office of Consumer Counsel. Reports and technical hearings quarterly August 2006 to October 2013.

Conduct of auction; review of bids; comparison to market prices; selection of winning bidders.

- 221. N.Y. PSC 06-M-1017,** policies, practices, and procedures for utility commodity supply service; City of New York. Comments, November and December 2006.

Multi-year contracts, long-term planning, new resources, procurement by utilities and other entities, cost recovery.

- 222. Conn. DPUC 06-01-08,** procurement of power for standard service and last-resort service, lessons learned; Connecticut Office Of Consumer Counsel. Comments and Technical Conferences December 2006 and January 2007.

Sharing of data and sources; benchmark prices; need for predictability, transparency and adequate review; utility-owned resources; long-term firm contracts.

- 223. Ohio PUC PUCO 05-1444-GA-UNC,** recovery of conservation costs, decoupling, and rate-adjustment mechanisms for Vectren Energy Delivery of Ohio; Ohio Consumers' Counsel. February 2007.

Assessing cost-effectiveness of natural-gas energy-efficiency programs. Calculation of avoided costs. Impact on rates. System benefits of DSM.

- 224. N.Y. PSC 06-G-1332,** Consolidated Edison Rates and Regulations; City of New York. March 2007.

Gas energy efficiency: benefits to customers, scope of cost-effective programs, revenue decoupling, shareholder incentives.

- 225. Alb. EUB 1500878**, ATCo Electric rates; Association of Municipal Districts & Counties and Alberta Federation of Rural Electrical Associations. May 2007.

Direct assignment of distribution costs to street lighting. Cost causation and cost allocation. Minimum-system and zero-intercept classification.

- 226. Conn. DPUC 07-04-24**, review of capacity contracts under Energy Independence Act; Connecticut Office of Consumer Counsel. Direct (with Jonathan Wallach), June 2007.

Assessment of proposed capacity contracts for new combined-cycle, peakers and DSM. Evaluation of contracts for differences, modeling of energy, capacity and forward-reserve markets. Corrections of errors in computation of costs, valuation of energy-price effects of peakers, market-driven expansion plans and retirements, market response to contracted resource additions, DSM proposal evaluation.

- 227. N.Y. PSC 07-E-0524**, Consolidated Edison electric rates; City of New York. September 2007.

Energy-efficiency planning. Recovery of DSM costs. Decoupling of rates from sales. Company incentives for DSM. Advanced metering. Resource planning.

- 228. Man. PUB 136-07**, Manitoba Hydro rates; Resource Conservation Manitoba and Time to Respect Earth's Ecosystem. February 2008.

Revenue allocation, rate design, and demand-side management. Estimation of marginal costs and export revenues.

- 229. Mass. EFSB 07-7**, DPU 07-58 & -59; proposed Brockton Power Company plant; Alliance Against Power Plant Location. March 2008

Regional supply and demand conditions. Effects of plant construction and operation on regional power supply and emissions.

- 230. Conn. DPUC 08-01-01**, peaking generation projects; Connecticut Office of Consumer Counsel. Direct (with Jonathan Wallach), April 2008.

Assessment of proposed peaking projects. Valuation of peaking capacity. Modeling of energy margin, forward reserves, other project benefits.

- 231. Ont. Energy Board 2007-0905**, Ontario Power Generation payments; Green Energy Coalition. April 2008.

Cost of capital for Hydro and nuclear investments. Financial risks of nuclear power.

- 232. Utah PSC 07-035-93**, Rocky Mountain Power Rates; Utah Committee of Consumer Services. July 2008

Cost allocation and rate design. Cost of service. Correct classification of generation, transmission, and purchases.

- 233. Ont. Energy Board** 2007-0707, Ontario Power Authority integrated system plan; Green Energy Coalition, Penimba Institute, and Ontario Sustainable Energy Association. Evidence (with Jonathan Wallach and Richard Mazzini), August 2008.
- Critique of integrated system plan. Resource cost and characteristics; finance cost. Development of least-cost green-energy portfolio.
- 234. N.Y. PSC** 08-E-0596, Consolidated Edison electric rates; City of New York. September 2008.
- Estimated bills, automated meter reading, and advanced metering. Aggregation of building data. Targeted DSM program design. Using distributed generation to defer T&D investments.
- 235. Conn. DPUC** 08-07-01, Integrated resource plan; Connecticut Office of Consumer Counsel. September 2008.
- Integrated resource planning scope and purpose. Review of modeling and assumptions. Review of energy efficiency, peakers, demand response, nuclear, and renewables. Structuring of procurement contracts.
- 236. Man. PUB** 2008 MH EIIR, Manitoba Hydro intensive industrial rates; Resource Conservation Manitoba and Time to Respect Earth's Ecosystem. November 2008.
- Marginal costs. Rate design. Time-of-use rates.
- 237. Md. PSC** 9036, Columbia Gas rates; Maryland Office of People's Counsel. January 2009.
- Cost allocation and rate design. Critique of cost-of-service studies.
- 238. Vt. PSB** 7440, extension of authority to operate Vermont Yankee; Conservation Law Foundation and Vermont Public Interest Research Group. Direct, February 2009; Surrebuttal, May 2009.
- Adequacy of decommissioning funding. Potential benefits to Vermont of revenue-sharing provision. Risks to Vermont of underfunding decommissioning fund.
- 239. N.S. UARB** M01439, Nova Scotia Power DSM and cost recovery; Nova Scotia Consumer Advocate. May 2009.
- Recovery of demand-side-management costs and lost revenue.
- 240. N.S. UARB** M01496, proposed biomass project; Nova Scotia Consumer Advocate. June 2009.
- Procedural, planning, and risk issues with proposed power-purchase contract. Biomass price index. Nova Scotia Power's management of other renewable contracts.

- 241. Conn. Siting Council 370A**, Connecticut Light & Power transmission projects; Connecticut Office of Consumer Counsel. July 2009. Also filed and presented in **MA EFSB 08-02**, February 2010.

Need for transmission projects. Modeling of transmission system. Realistic modeling of operator responses to contingencies

- 242. Mass. DPU 09-39**, NGrid rates; Mass. Department of Energy Resources. August 2009.

Revenue-decoupling mechanism. Automatic rate adjustments.

- 243. Utah PSC 09-035-23**, Rocky Mountain Power rates; Utah Office of Consumer Services. Direct, October 2009; rebuttal, November 2009.

Cost-of-service study. Cost allocators for generation, transmission, and substation.

- 244. Utah PSC 09-035-15**, Rocky Mountain Power energy-cost-adjustment mechanism; Utah Office of Consumer Services. Direct, November 2009; surrebuttal, January 2010.

Automatic cost-adjustment mechanisms. Net power costs and related risks. Effects of energy-cost-adjustment mechanisms on utility performance.

- 245. Penn. PUC R-2009-2139884**, Philadelphia Gas Works energy efficiency and cost recovery; Philadelphia Gas Works. December 2009.

Avoided gas costs. Recovery of efficiency-program costs and lost revenues. Rate impacts of DSM.

- 246. B.C. UC 3698573**, British Columbia Hydro rates; British Columbia Sustainable Energy Association and Sierra Club British Columbia. February 2010.

Rate design and energy efficiency.

- 247. Ark. PSC 09-084-U**, Entergy Arkansas rates; National Audubon Society and Audubon Arkansas. Direct, February 2010; surrebuttal, April 2010.

Recovery of revenues lost to efficiency programs. Determination of lost revenues. Incentive and recovery mechanisms.

- 248. Ark. PSC 10-010-U**, Energy efficiency; National Audubon Society and Audubon Arkansas. Direct, March 2010; reply, April 2010.

Regulatory framework for utility energy-efficiency programs. Fuel-switching programs. Program administration, oversight, and coordination. Rationale for commercial and industrial efficiency programs. Benefit of energy efficiency.

- 249. Ark. PSC 08-137-U**, Generic rate-making; National Audubon Society and Audubon Arkansas. Direct, March 2010; supplemental, October 2010; reply, October 2010.
Calculation of avoided costs. Recovery of utility energy-efficiency-program costs and lost revenues. Shareholder incentives for efficiency-program performance.
- 250. Plymouth, Mass., Superior Court** Civil Action No. PLCV2006-00651-B (Hingham Municipal Lighting Plant v. Gas Recovery Systems LLC et al.), Breach of agreement; defendants. Affidavit, May 2010.
Contract interpretation. Meaning of capacity measures. Standard practices in capacity agreements. Power-pool rules and practices. Power planning and procurement.
- 251. N.S. UARB M02961**, Port Hawkesbury biomass project; Nova Scotia Consumer Advocate. June 2010.
Least-cost planning and renewable-energy requirements. Feasibility versus alternatives. Unknown or poorly estimated costs.
- 252. Mass. DPU 10-54**, NGrid purchase of long-term power from Cape Wind; Natural Resources Defense Council et al. July 2010.
Effects of renewable-energy projects on gas and electric market prices. Impacts on system reliability and peak loads. Importance of PPAs to renewable development. Effectiveness of proposed contracts as price edges.
- 253. Md. PSC 9230**, Baltimore Gas & Electric rates; Maryland Office of People's Counsel. Direct, July 2010; rebuttal, surrebuttal, August 2010.
Allocation of gas- and electric-distribution costs. Critique of minimum-system analyses and direct assignment of shared plant. Allocation of environmental compliance costs. Allocation of revenue increases among rate classes.
- 254. Ont. Energy Board 2010-0008**, Ontario Power Generation facilities charges; Green Energy Coalition. Evidence, August 2010.
Critique of including a return on CWIP in current rates. Setting cost of capital by business segment.
- 255. N.S. UARB 03454**, Heritage Gas rates; Nova Scotia Consumer Advocate. October 2010.
Cost allocation. Cost of capital. Effect on rates of growth in sales.
- 256. Man. PUB 17/10**, Manitoba Hydro rates; Resource Conservation Manitoba and Time to Respect Earth's Ecosystem. December 2010.
Revenue-allocation and rate design. DSM program.

- 257. N.S. UARB M03665**, Nova Scotia Power depreciation rates; Nova Scotia Consumer Advocate. February 2011.
- Depreciation and rates.
- 258. New Orleans City Council UD-08-02**, Entergy IRP rules; Alliance for Affordable Energy. December 2010.
- Integrated resource planning: Purpose, screening, cost recovery, and generation planning.
- 259. N.S. UARB M03665**, depreciation rates of Nova Scotia Power; Nova Scotia Consumer Advocate. February 2011.
- Steam-plant retirement dates, post-retirement use, timing of decommissioning and removal costs.
- 260. N.S. UARB M03632**, renewable-energy community-based feed-in tariffs; Nova Scotia Consumer Advocate. March 2011.
- Adjustments to estimate of cost-based feed-in tariffs. Rate effects of feed-in tariffs.
- 261. Mass. EFSB 10-2/DPU 10-131, 10-132**; NStar transmission; Town of Sandwich, Mass. Direct, May 2011; Surrebuttal, June 2011.
- Need for new transmission; errors in load forecasting; probability of power outages.
- 262. Utah PSC 10-035-124**, Rocky Mountain Power rate case; Utah Office of Consumer Services. June 2011.
- Load data, allocation of generation plants, scrubbers, power purchases, and service drops. Marginal cost study: inclusion of all load-related transmission projects, critique of minimum- and zero-intercept methods for distribution. Residential rate design.
- 263. N.S. UARB M04104**; Nova Scotia Power general rate application; Nova Scotia Consumer Advocate. August 2011.
- Cost allocation: allocation of costs of wind power and substations. Rate design: marginal-cost-based rates, demand charges, time-of-use rates.
- 264. N.S. UARB M04175**, Load-retention tariff; Nova Scotia Consumer Advocate. August 2011.
- Marginal cost of serving very large industrial electric loads; risk, incentives and rate design.
- 265. Ark. PSC 10-101-R**, Rulemaking re self-directed energy efficiency for large customers; National Audubon Society and Audubon Arkansas. July 2011.
- Structuring energy-efficiency programs for large customers.

- 266. Okla. CC PUD 201100077**, current and pending federal regulations and legislation affecting Oklahoma utilities; Sierra Club. Comments July, October 2011; presentation July 2011.

Challenges facing Oklahoma coal plants; efficiency, renewable and conventional resources available to replace existing coal plants; integrated environmental compliance planning.

- 267. Nevada PUC 11-08019**, integrated analysis of resource acquisition, Sierra Club. Comments, September 2011; hearing, October 2011.

Scoping of integrated review of cost-effectiveness of continued operation of Reid Gardner 1–3 coal units.

- 268. La. PSC R-30021**, Louisiana integrated-resource-planning rules; Alliance for Affordable Energy. Comments, October 2011.

Scoping of integrated review of cost-effectiveness of continued operation of Reid Gardner 1–3 coal units.

- 269. Okla. CC PUD 201100087**, Oklahoma Gas and Electric Company electric rates; Sierra Club. November 2011.

Resource monitoring and acquisition. Benefits to ratepayers of energy conservation and renewables. Supply planning

- 270. Ky. PSC 2011-00375**, Kentucky utilities' purchase and construction of power plants; Sierra Club and National Resources Defense Council. December 2011.

Assessment of resources, especially renewables. Treatment of risk. Treatment of future environmental costs.

- 271. N.S. UARB M04819**, demand-side-management plan of Efficiency Nova Scotia; Nova Scotia Consumer Advocate. May 2012.

Avoided costs. Allocation of costs. Reporting of bill effects.

- 272. Kansas CC 12-GIMX-337-GIV**, utility energy-efficiency programs; The Climate and Energy Project. June 2012.

Cost-benefit tests for energy-efficiency programs. Collaborative program design.

- 273. N.S. UARB M04862**, Port Hawksbury load-retention mechanism; Nova Scotia Consumer Advocate. June 2012.

Effect on ratepayers of proposed load-retention tariff. Incremental capital costs, renewable-energy costs, and costs of operating biomass cogeneration plant.

- 274. Utah PSC 11-035-200**, Rocky Mountain Power Rates; Utah Office of Consumer Council. June 2012.

Cost allocation. Estimation of marginal customer costs.

- 275. Ark. PSC** 12-008-U, environmental controls at Southwestern Electric Power Company's Flint Creek plant; Sierra Club. Direct, June 2012; rebuttal, August 2012; further, March 2013.

Costs and benefits of environmental retrofit to permit continued operation of coal plant, versus other options including purchased gas generation, efficiency, and wind. Fuel-price projections. Need for transmission upgrades.

- 276. U.S. EPA** EPA-R09-OAR-2012-0021, air-quality implementation plan; Sierra Club. September 2012.

Costs, financing, and rate effects of Apache coal-plant scrubbers. Relative incomes in service territories of Arizona Coop and other utilities.

- 277. Arkansas PSC** Docket No. 07-016-U; Entergy Arkansas' integrated resource plan; Audubon Arkansas. Comments, September 2012.

Estimation of future gas prices. Estimation of energy-efficiency potential. Screening of resource decisions. Wind costs.

- 278. Vt. PSB** 7862, Entergy Nuclear Vermont and Entergy Nuclear Operations petition to operate Vermont Yankee; Conservation Law Foundation. October 2012.

Effect of continued operation on market prices. Value of revenue-sharing agreement. Risks of underfunding decommissioning fund.

- 279. Man. PUB** 2012–13 GRA, Manitoba Hydro rates; Green Action Centre. November 2012.

Estimation of marginal costs. Fuel switching.

- 280. N.S. UARB** M05339, Capital Plan of Nova Scotia Power; Nova Scotia Consumer Advocate. January 2013.

Economic and financial modeling of investment. Treatment of AFUDC.

- 281. N.S. UARB** M05416, South Canoe wind project of Nova Scotia Power; Nova Scotia Consumer Advocate. January 2013.

Revenue requirements. Allocation of tax benefits. Ratemaking.

- 282. N.S. UARB** 05419; Maritime Link transmission project and related contracts, Nova Scotia Consumer Advocate and Small Business Advocate. Direct, April 2013; supplemental (with Seth Parker), November 2013.

Load forecast, including treatment of economy energy sales. Wind power cost forecasts. Cost effectiveness and risk of proposed project. Opportunities for improving economics of project.

- 283. Ont. Energy Board** 2012-0451/0433/0074, Enbridge Gas Greater Toronto Area project; Green Energy Coalition. June 2013, revised August 2013.
- Estimating gas pipeline and distribution costs avoidable through gas DSM and curtailment of electric generation. Integrating DSM and pipeline planning.
- 284. N.S. UARB** 05092, tidal-energy feed-in-tariff rate; Nova Scotia Consumer Advocate. August 2013.
- Purchase rate for test and demonstration projects. Maximizing benefits under rate-impact caps. Pricing to maximize provincial advantage as a hub for emerging tidal-power industry.
- 285. N.S. UARB** 05473, Nova Scotia Power 2013 cost-of-service study; Nova Scotia Consumer Advocate. October 2013.
- Cost-allocation and rate design.
- 286. B.C. UC** 3698715 & 3698719; performance-based ratemaking plan for FortisBC companies; British Columbia Sustainable Energy Association and Sierra Club British Columbia. Direct (with John Plunkett), December 2013.
- Rationale for enhanced gas and electric DSM portfolios. Correction of utility estimates of electric avoided costs. Errors in program screening. Program potential. Recommended program ramp-up rates.
- 287. Conn. PURA** Docket No. 14-01-01, Connecticut Light and Power Procurement of Standard Service and Last-Resort Service. July and October 2014.
- Proxy for review of bids. Oversight of procurement and selection process.
- 288. Conn. PURA** Docket No. 14-01-02, United Illuminating Procurement of Standard Service and Last-Resort Service. January, April, July, and October 2014.
- Proxy for review of bids. Oversight of procurement and selection process.
- 289. Man. PUB** 2014, need for and alternatives to proposed hydro-electric facilities; Green Action Centre. Evidence (with Wesley Stevens) February 2014.
- Potential for fuel switching, DSM, and wind to meet future demand.
- 290. Utah PSC** 13-035-184, Rocky Mountain Power Rates; Utah Office of Consumer Services. May 2014.
- Class cost allocation. Classification and allocation of generation plant and purchased power. Principles of cost-causation. Design of backup rates.
- 291. Minn. PSC** E002/GR-13-868, Northern States Power rates; Clean Energy Intervenor. Direct, June 2014; rebuttal, July 2014; surrebuttal, August 2014.
- Inclining-block residential rate design. Rationale for minimizing customer charges.

- 292. Cal. PUC** Rulemaking 12-06-013, electric rates and rate structures; Natural Resources Defense Council. September 2014.

Redesigning residential rates to simplify tier structure while maintaining efficiency and conservation incentives. Effect of marginal price on energy consumption. Realistic modeling of consumer price response. Benefits of minimizing customer charges.

- 293. Md. PSC** 9361, proposed merger of PEPCo Holdings into Exelon; Sierra Club and Chesapeake Climate Action Network. Direct, December 2014; surrebuttal, January 2015.

Effect of proposed merger on Consumer bills, renewable energy, energy efficiency, and climate goals.

- 294. N.S. UARB** M06514, 2015 capital-expenditure plan of Nova Scotia Power; Nova Scotia Consumer Advocate. January 2015.

Economic evaluation of proposed projects. Treatment of AFUDC, overheads, and replacement costs of lost generation. Computation of rate effects of spending plan.

- 295. Md. PSC** 9153 et al., Maryland energy-efficiency programs; Maryland Office of People's Counsel. January 2015.

Costs avoided by demand-side management. Demand-reduction-induced price effects.

- 296. Québec Régie de L'énergie** R-3867-2013 phase 1, Gaz Métro cost allocation and rate structure; ROÉÉ. February 2015

Classification of the area-spanning system; minimum system and more realistic approaches. Allocation of overhead, energy-efficiency, gas-supply, engineering-and-planning, and billing costs.

- 297. Conn. PURA** Docket No. 15-01-01, Connecticut Light and Power Procurement of Standard Service and Last-Resort Service. February and July 2015.

Proxy for review of bids. Oversight of procurement and selection process.

- 298. Conn. PURA** Docket No. 15-01-02, United Illuminating Procurement of Standard Service and Last-Resort Service. February, July, and October 2015.

Proxy for review of bids. Oversight of procurement and selection process.

- 299. Ky. PSC** 2014-00371, Kentucky Utilities electric rates; Sierra Club. March 2015.

Review basis for higher customer charges, including cost allocation. Design of time-of-day rates.

- 300. Ky. PSC 2014-00372**, Louisville Gas and Electric electric rates; Sierra Club. March 2015.

Review basis for higher customer charges, including cost allocation. Design of time-of-day rates.

- 301. Mich. PSC U-17767**, DTE Electric Company rates; Michigan Environmental Council, Sierra Club, and Natural Resource Defense Council. May 2015.

Cost effectiveness of pollution-control retrofits versus retirements. Market prices. Costs of alternatives.

- 302. N.S. UARB M06733**, supply agreement between Efficiency One and Nova Scotia Power; Nova Scotia Consumer Advocate. June 2015.

Avoided costs. Cost-effectiveness screening of DSM. Portfolio design. Affordability and bill effects.

- 303. Penn. PUC P-2014-2459362**, Philadelphia Gas Works DSM, universal-service, and energy-conservation plans; Philadelphia Gas Works. Direct, May 2015; Rebuttal, July 2015.

Avoided costs. Recovery of lost margin.

- 304. Ont. Energy Board EB-2015-0029/0049**, 2015–2020 DSM Plans Of Enbridge Gas Distribution and Union Gas, Green Energy Coalition. Evidence July 31, 2015, Corrected August 12, 2015.

Avoided costs: price mitigation, carbon prices, marginal gas supply costs, avoidable distribution costs, avoidable upstream costs (including utility-owned pipeline facilities).

- 305. PUC Ohio 14-1693-EL-RDR**, AEP Ohio Affiliate purchased-power agreement, Sierra Club. September 2015.

Economics of proposed PPA, market energy and capacity projections. Risk shifting. Lack of price stability and reliability benefits. Market viability of PPA units.

- 306. N.S. UARB M06214**, NS Power Renewable-to-Retail rate, Nova Scotia Consumer Advocate. November 2015.

Review of proposed design of rate for third-party sales of renewable energy to retail customers. Distribution, transmission and generation charges.

- 307. PUC Texas Docket No. 44941**, El Paso Electric rates; Energy Freedom Coalition of America. December 2015.

Cost allocation and rate design. Effect of proposed DG rate on solar customers. Load shapes of residential customers with and without solar. Problems with demand charges.

- 308. N.S. UARB M07176**, NS Power 2016 Capital Expenditures Plan, Nova Scotia Consumer Advocate. February 2016.

Economic evaluation of proposed projects, including replacement energy costs and modeling of equipment failures. Treatment of capitalized overheads and depreciation cash flow in computation of rate effects of spending plan.

- 309. Md. PSC 9406**, BGE Application for recovery of Smart Meter costs, Maryland Office of People's Counsel. Direct February 2016, Rebuttal March 2016, Surrebuttal March 2016.

Assessment of benefits of Smart Meter programs for energy revenue, load reductions and price mitigation; capacity load reductions and price mitigation; free riders and load shifting in peak-time rebate (PTR) program; cost of PTR participation; effect of load reductions on PJM capacity obligations, capacity prices and T&D costs.

- 310. City of Austin TX**, Austin Energy 2016 Rate Review, Sierra Club and Public Citizen. May 2016

Allocation of generation costs. Residential rate design. Geographical rate differentials. Recognition of coal-plant retirement costs.

- 311. Manitoba PUB**, Manitoba Hydro Cost of Service Methodology Review, Green Action Centre. June 2016, reply August 2016.

Allocation of generation costs. Identifying generation-related transmission assets. Treatment of subtransmission. Classification of distribution lines. Allocation of distribution substations and lines. Customer allocators. Shared service drops.

- 312. Md. PSC 9418**, PEPCo Application for recovery of Smart Meter costs, Maryland Office of People's Counsel. Direct July 2016, Rebuttal August 2016, Surrebuttal September 2016.

Assessment of benefits of Smart Meter programs for energy revenue, load reductions and price mitigation; load reductions in dynamic-pricing (DP) program; cost of DP participation; effect of load reductions on PJM capacity obligations, capacity prices and T&D costs.

- 313. Md. PSC 9424**, Delmarva P&L Application for recovery of Smart Meter costs, Maryland Office of People's Counsel. Direct September 2016, Rebuttal October 2016, Surrebuttal October 2016.

Estimation of effects of Smart Meter programs—dynamic pricing (DP), conservation voltage reduction and an informational program—on wholesale revenues, wholesale prices and avoided costs; estimating load reductions from the DP program; cost of DP participation; effect of load reductions on PJM capacity obligations, capacity prices and T&D costs.

- 314. N.H. PUC** Docket No. DE 16-576, Alternative Net Metering Tariffs, Conservation Law Foundation. Direct October 2016, Reply December 2016.

Framework for evaluating rates for distributed generation. Costs avoided and imposed by distributed solar. Rate design for distributed generation.

- 315. Puerto Rico Energy Commission** CEPR-AP-2015-0001, Puerto Rico Electric Power Authority rate proceeding, PR Energy Commission. Report December 2016.

Comprehensive review of structure of electric utility, cost causation, load data, cost allocation, revenue allocation, marginal costs, retail rate designs, identification and treatment of customer subsidies, structuring rate riders, and rates for distributed generation and net metering.

- 316. N.S. UARB** M07745, NS Power 2017 Capital Expenditures Plan, Nova Scotia Consumer Advocate. January 2017.

Computation and presentation of rate effects. Consistency of assumed plant operation and replacement power costs. Control of total cost of small projects. Coordination of information-technology investments. Investments in biomass plant with uncertain future.

- 317. N.S. UARB** M07746, NS Power Enterprise Resource Planning project, Nova Scotia Consumer Advocate. February 2017.

Estimated software project costs. Costs of internal and contractor labor. Affiliate cost allocation.

- 318. N.S. UARB** M07767, NS Power Advanced Metering Infrastructure projects, Nova Scotia Consumer Advocate. February 2017.

Design and goals of the AMI pilot program. Procurement. Coordination with information-technology and software projects.

- 319. Québec Régie de l'énergie** R-3867-2013 phase 3A; Gaz Métro estimates of marginal O&M costs; ROÉÉ. March 2017.

Estimation of one-time, continuing and periodic customer-related operating and maintenance cost. Costs related to loads and revenues. Dealing with lumpy costs.

- 320. N.S. UARB** M07718, NS Power Maritime Link Cost Recovery, Nova Scotia Consumer Advocate. April 2017.

Usefulness of transmission interconnection prior to operation of the associated power plant.

- 321. Mass. DPU** 17-05, Eversource Rate Case, Cape Light Compact. Direct April 2017, Rebuttal May 2017.

Critique of proposed performance-based ratemaking mechanism. Proposal for improvements.

- 322. PUCO 16-1852**, AEP Ohio Electric Security Plan, Natural Resources Defense Council. May 2017.
- Residential customer charge. Cost causation. Effect of rate design on consumption.
- 323. Iowa Utilities Board RPU-2017-0001**, Interstate Power and Light rate case, Natural Resources Defense Council. Direct August 2017, Reply September 2017.
- Critique of proposed demand-charge pilot rates for residential and small commercial customers. Defects of demand rates and shortcomings of IPL experimental proposal design.
- 324. N.S. UARB M08087**, NS Power 2017 Load Forecast, Nova Scotia Consumer Advocate. Direct August 2017.
- Review of forecast methodology, including extrapolation of drivers of commercial load from US national data; treatment of non-firm and competitive loads; behind-the-meter generation and controlling peak-load growth.
- 325. Québec Régie de l'énergie R-3867-2013 phase 3B**; Gaz Métro line-extension policy; ROÉÉ. September 2017.
- The costs of adding new load. Estimating the durability of revenues from line extensions.
- 326. Mass. EFSB 17-02**; Eversource proposed Hudson-Sudbury transmission line; Town of Sudbury. October 2017.
- Accuracy of ISO New England regional load forecasts. Potential for distributed solar, storage and demand response.
- 327. Manitoba PUB**, Manitoba 2017/18 & 2018/19 General Rate Application; Green Action Coalition. October 2017.
- Marginal costs. Rate design. Affordability rate design for low-income and electric-heating customers. Design of residential inclining blocks. Problems with demand charges and demand ratchets. Cost-of-service study improvements.
- 328. N.S. UARB M08383**, NS Power 2018 Annually Adjusted Rates; Consumer Advocate. January 2018.
- Projection of incremental dispatch cost. Computing administrative charges. Methodological issues.

- 329. N.S. UARB M08349**, NS Power's Advanced Metering Infrastructure Proposal; Consumer Advocate. January 2018.

Estimation of AMI benefits: load balancing among feeders, critical peak pricing, avoided costs of meters for distributed generation. NS Power's claims of benefits from accounting credits (AFUDC, overheads, and converting write-offs to reduced revenue) and shifting costs to customers (earlier billing, higher recorded usage). Realistic AMI meter life. Excessive charge for customers who opt out of AMI.

- 330. N.S. UARB M08350**, NS Power 2018 Annual Capital Expenditures Plan; Consumer Advocate. February 2018.

Overlap between ACE projects and AMI project. Hydro project planning and valuation of lost hydro energy output.

- 331. Conn. PURA Docket No. 08-01-01RE05**, Proposed Amendment to Peaker Contracts; Connecticut Consumers Counsel. May 2018.

Dividing increased revenues from ISO-NE's Pay-for-Performance mechanism between contract generators and ratepayers.

- 332. Kansas CC Docket No. 18-WSEE-328-RTS**, Westar Rate Case; Sierra Club. Direct June 2018. Rebuttal June 2018. Supplement July 2018.

Costs and benefits of running Westar coal plants. Costs of renewables and other alternatives. Recommendation regarding planning, coal retirement schedule, and acquisition of leased capacity.

- 333. Cal. PUC Application 17-09-006**; Pacific Gas and Electric Gas Cost Allocation Proceeding; Small Business Utility Advocates. Direct June 2018.

Allocation of gas distribution system costs. Allocation of costs of energy-efficiency programs.

- 334. N.S. UARB M08670**, NS Power 2018 Load Forecast, Nova Scotia Consumer Advocate. Direct July 2018.

Review of forecast methodology, including treatment of future energy-efficiency programs, treatment of third-party supply and behind-the-meter generation.

- 335. Iowa Utilities Board RPU-2018-0003**, MidAmerican Energy Request for Approval of Ratemaking Principles for Wind XII; Sierra Club. Direct August 2018.

Cost and benefits of continued operation of six MidAmerican coal-fired units.

- 336. Cal. PUC A.18-02-016, 03-001, 03-002**; 2018 Energy Storage Plans; Small Business Utility Advocates. Direct, Rebuttal and Supplement, August 2018.

Reliance on substation-sited storage. Need for increased emphasis on customer-sited and shared storage. Maximizing benefits, total and for small business. Oversized SDG&E proposed projects. Cost recovery. Storage technology diversity.

- 337. La. PSC U-34794;** Cleco Corp Purchase of NRG Assets and Contracts; Sierra Club. Direct, September 2018.

Economics of NRG generation resources, Cleco Power coal plants and wholesale sales contracts. Risks of the proposed transaction.

- 338. Cal. PUC A.18-11-005;** Southern California Gas Demand-Response Proposal; Small Business Utility Advocates. Direct March 2019, Rebuttal April 2019.

Potential benefits of gas demand response and SoCalGas failure to identify potential benefits from its programs. Program design. Cost allocation.

- 339. Cal. PUC A.18-11-003;** Pacific Gas & Electric Electric Vehicle Rate; Small Business Utility Advocates. Direct April 2019, Rebuttal May 2019.

Critique of subscription demand charge. Time-of-use periods. Outreach to small business. Time-of-use price differentials.

- 340. Cal. PUC A.18-07-024;** Southern California Gas and San Diego Gas & Electric Triennial Cost Allocation Proceeding; Small Business Utility Advocates. Direct April 2019.

Core commercial declining blocks. Computation of customer charges. Embedded versus marginal cost allocation. Marginal cost computation. Allocation of self-generation incentives.

- 341. Vt. PUC 19-0397-PET;** Screening Values for Energy-Efficiency Measures; Conservation Law Foundation. Direct May 2019.

Conceptual basis for including price-suppression benefits to consumers. Avoided T&D costs. Avoided externalities with a renewable energy standard. Risk mitigation.

- 342. N.S. UARB M09096;** EfficiencyOne Application for 2020–2022 DSM Plan; Consumer Advocate. May 2019

Evaluate NS Power critique of EfficiencyOne proposal. Comparability of efficiency budgets. Affordability. Energy-efficiency programs and resource planning.

- 343. N.S. UARB M09191;** NS Power 2019 Load Forecast Report; Consumer Advocate. July 2019.

Review load-forecast treatment of energy efficiency, fuel switching, electric vehicles, behind-the-meter solar, AMI-enabled programs, and the changing trend in lighting efficiency.

- 344. Iowa Utilities Board RPU-2019-001;** Interstate Power and Light Rate Case; Sierra Club. Direct August 2019; Rebuttal September 2019.

Economics of continued operation of five coal units: fuel, O&M, capital additions, overheads, market revenues, and cost of renewable resources. Recommend retirement of all units.

- 345. Maine PUC 2019-00101;** Unitil Precedent Agreement for Westbrook Xpress, Conservation Law Foundation. August 2019.

The role of fuel conversions in Unitil's load forecast. Mandates for reducing greenhouse gas emissions. Efficient electric end uses as alternatives to gas system expansion. Risks of and alternatives to new pipeline supply.

- 346. Maine PUC 2019-00105;** Bangor Natural Gas Precedent Agreement for Westbrook Xpress, Conservation Law Foundation. August 2019.

Mandates for reducing greenhouse gas emissions. Efficient electric end uses as alternatives to gas system expansion. Risks of and alternatives to new pipeline supply.

- 347. Wisconsin PSC 6690-UR-126;** Wisconsin Public Service Corporation 2020 Rate Case, Sierra Club. Direct August 2019, Surrebuttal October 2019.

Economics of continued operation of four coal units: fuel, O&M, capital additions, overheads, market revenues, and cost of renewable resources. Recommend retirement of uneconomic units.

- 348. Wisconsin PSC 05-UR-109;** Wisconsin Electric Power Company 2020 Rate Case; Sierra Club. Direct August 2019, Surrebuttal October 2019

Economics of continued operation of six coal units: fuel, O&M, capital additions, overheads, market revenues, and cost of renewable resources. Recommend retirement of uneconomic units.

- 349. N.S. UARB M09277;** NS Power Maritime Link Cost Recovery, Nova Scotia Consumer Advocate. August 2019.

Benefits of the Maritime Link transmission line prior to operation of associated power supply and connecting transmission facilities.

- 350. N.H. PUC DG 17-198;** Liberty Utilities Petition to Approve Firm Supply, Transportation Agreements, and the Granite Bridge Project; Conservation Law Foundation. September 2019.

Need for transportation contracts and new pipeline. Alternative of switching oil and propane to efficient electric end uses. Limited life of gas infrastructure and effect on ratepayer costs.

- 351. Colorado PUC** 19AL-0268E; Public Service of Colorado Rate Case; Sierra Club. September 2019.

Prudence of management of superheater tube failures. Unfavorable economics of coal plants nationally. Need for continuing review of coal-plant economics and benefits of retirement.

- 352. N.H. PUC** DG 17-152; Liberty Utilities Least Cost Integrated Resource Plan; Conservation Law Foundation. September 2019.

Integrated planning for gas utilities in an era of carbon constraints. Heat pump electrification versus gas conversion of oil-fired space and water heating.

- 353. N.S. UARB** M09420; NS Power Application for an Extra-Large Industrial Active Demand Control Tariff; Nova Scotia Consumer Advocate. December 2019.

Estimating incremental costs, including lost wheeling revenues, variable O&M, and variable capital cost; updating and reconciliation of incremental costs.

- 354. Cal. PUC** A.19-07-006; San Diego Gas & Electric Fast-Charging and Heavy-Duty Electric Vehicle Proposal; Small Business Utility Advocates. Direct January 2020, Rebuttal February 2020.

Interim rate proposal. Critique of subscription and demand charges. Time-of-use periods. Recovery of lost revenues.

N.S. UARB M09519; NS Power Smart Grid Application; Nova Scotia Consumer Advocate. February 2020.

Differentiating capital costs from expenses. Inclusion of decommissioning costs in project plan. Selection of the Distributed Energy Resources Management System.

N.S. UARB M09499; NS Power 2020 Annual Capital Expenditure Plan; Nova Scotia Consumer Advocate. February 2020.

Planning for hydro life extension or retirement. Appropriate levels of contingency in project budgets. Aggregation of multi-year capital programs. Cost-control efforts.

Cal. PUC A.19-03-002; San Diego Gas & Electric General Rate Application, Phase 2; Small Business Utility Advocates. Direct March 2020; Rebuttal May 2020.

Problems with proposed increases in the Monthly Service Fees and reliance on demand charges in for medium non-residential customers. Improving hours for the TOU periods.

ACRONYMS AND INITIALISMS

APS	Alleghany Power System	LRAM	Lost-Revenue-Adjustment Mechanism
ASLB	Atomic Safety and Licensing Board	NARUC	National Association of Regulatory Utility Commissioners
BEP	Board of Environmental Protection	NEPOOL	New England Power Pool
BPU	Board of Public Utilities	NRC	Nuclear Regulatory Commission
BRC	Board of Regulatory Commissioners	OCA	Office of Consumer Advocate
CC	Corporation Commission	PSB	Public Service Board
CMP	Central Maine Power	PBR	Performance-based Regulation
DER	Department of Environmental Regulation	PSC	Public Service Commission
DPS	Department of Public Service	PUC	Public Utility Commission
DQE	Duquesne Light	PUB	Public Utilities Board
DPUC	Department of Public Utilities Control	PURA	Public Utility Regulatory Authority
DSM	Demand-Side Management	PURPA	Public Utility Regulatory Policy Act
DTE	Department of Telecommunications and Energy	ROÉÉ	Regroupement des organismes environnementaux en énergie
EAB	Environmental Assessment Board	SCC	State Corporation Commission
EFSB	Energy Facilities Siting Board	UARB	Utility and Review Board
EFSC	Energy Facilities Siting Council	USAEE	U.S. Association of Energy Economists
EUB	Energy and Utilities Board	UC	Utilities Commission
FERC	Federal Energy Regulatory Commission	URC	Utility Regulatory Commission
ISO	Independent System Operator	UTC	Utilities and Transportation Commission