

Elson Advocacy

BY RESS AND EMAIL

June 11, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. 2024 to 2028 Rates Application
EB-2024-0111**

I am writing on behalf of Environmental Defence to submit a request to file evidence regarding the applicant's proposed incentive rate-setting mechanism. As detailed below, the proposed evidence would recommend adjustments to that mechanism aimed at reducing the applicant's strong incentive to increase rate base, both as a general tool for capital cost containment and as a way to mitigate financial risks to customers associated with the energy transition.

Evidence Description

The proposed evidence would be relevant to the following issues outlined in the issues list:

- 1) Are the proposed Price Cap Incentive Rate-Setting Mechanism, Annual Rate Adjustment Formula, and term appropriate?
- 2) Are the proposed elements of Enbridge Gas's Price Cap Incentive Rate-Setting Mechanism appropriate?
- 7) How should Enbridge Gas be incentivized to implement economic alternatives to gas infrastructure and how should the recovery of its costs be treated?

The evidence would recommend adjustments to the proposed incentive rate-setting mechanism aimed at enhancing appropriate cost containment incentives and reducing the applicant's strong incentive to increase rate base. Many incentive rate-setting mechanisms have a strong capital bias, which can lead to a mismatch between the interests of the utility and its customers. Although this is a long-standing problem, it has been amplified by risks associated with the energy transition. This includes the risk of escalating rates and stranded assets if customers leave the system without the utility reducing costs accordingly. The capital bias problem has also come to the forefront with efforts to implement cost-effective alternatives to infrastructure (i.e. non-pipe solutions), because utilities have a strong disincentive to replace capital spending with

operational spending, even if the operational spending solution is far more cost-effective for customers.

The proposed evidence would provide recommendations with both imperatives in mind – the traditional need for capital cost containment and the increasing need to adjust utility incentives in order to safeguard customer interests in light of the energy transition and the range of potential futures for the energy system.

Environmental Defence proposes to retain Matthew McDonnell and Brad Cebulko of the Current Energy Group. Matthew McDonnell would lead the evidence development. Mr. McDonnell has a wealth of experience with incentive rate-setting mechanisms. This includes his work as Commission Counsel with the Hawaii Public Utilities Commission, where he led the development of the first full performance-based regulation framework in the United States. He has also supported regulators, utilities, and ratepayers in his roles with Navigant and Strategen, including as the Executive Vice President and Head of Consulting for Strategen before founding the Current Energy Group. Mr. McDonnell's current focus areas include the modernization of regulatory frameworks for gas utilities in an era of decarbonization – a topic he has consulted and presented on extensively.

Brad Cebulko also has a strong background in both incentive rate-setting mechanisms and energy transition issues. As a senior policy advisor with the Washington Utilities and Transportation Commissioner, he led efforts to initiate the development of a new performance-based regulatory framework. He continues to work on that project, now as a consultant. He also advises clients with a focus on gas energy transition issues, including approaches to integrated gas planning proceedings as well as advanced regulatory frameworks to inform the future of gas.

We have conferred with Board Staff to confirm that there will be no overlap between the evidence commissioned by Environmental Defence and Board Staff relating to incentive rate-setting mechanisms.

We have also conferred with other intervenors to receive feedback on this evidence description and to gauge interest in the proposed evidence from the perspectives of other stakeholders. A number of intervenors have expressed an interest in reviewing and considering the proposed report, including the Building Owners and Managers Association (BOMA), Federation of Rental-Housing Providers of Ontario (FRPO), Green Energy Coalition (GEC), Heating, Refrigeration and Air Conditioning Institute of Canada (HRAI), Kitchener Utilities, Minogi, Pollution Probe, Schools Energy Coalition (SEC), and Three Fires Group (TFG), with the caveat that they will not necessarily agree or support the analysis and/or recommendations.

Budget

Mr. McDonnell and Mr. Cebulko estimate that it would cost approximately \$41,250 to \$52,800 to prepare their report. Although we estimate that the remaining steps in the hearing may require an additional 40% in consultant costs based on past experience, we cannot provide a firm estimate of those costs as they are based on factors that are entirely outside of our control, including the number of interrogatories, whether presentations will be required, and whether Mr.

McDonnell and Cebulko would be called as witnesses. Mr. McDonnell and Mr. Cebulko would only be available to testify virtually due to cost constraints.

We anticipate incremental counsel time associated with this evidence to be less than \$2,500.

Conclusion

The applicant originally proposed to spend over \$7 billion in capital over the next five years, which would have added another \$2 billion to rate base over that period.¹ This is on top of a doubling of rate base over the past 10 years.² Even without the energy transition issues addressed in Phase 1, this raises questions around the applicant's incentive to invest in capital infrastructure. The proposed evidence is well worth it, and would come at an exceedingly modest cost in comparison to the billion-dollar issues at stake.

Yours truly,



Kent Elson

cc: Parties to the above proceeding

¹ Exhibit 2, Tab 5, Schedule 2, Page 2 (Utility System Plan capital between 2024 and 2028 is \$7,172.6, or \$7,374.1 including the Panhandle Regional Expansion Project) ([link](#), PDF p. 254); JT4.24 ([link](#), PDF p. 1784).

² Exhibit 2, Tab 1, Schedule 1, Plus Attachment, Page 4 ([link](#), PDF p. 4)

Matthew McDonnell

Managing Partner * (313) 657-8982 * mmcdonnell@currentenergy.group

Education

Juris Doctor

James E. Rogers College of Law, University of Arizona (2011)

Bachelor of Arts, Finance

Michigan State University – East Lansing, MI (2006)

Work Experience

Managing Partner, Current Energy Group, (May 2024 – Present)

- Works with consumer advocates and public interest organizations on gas and electric regulatory issues before state public utility commissions.

Executive Vice President, Strategen, (January 2019 – April 2024)

- Led Strategen's consulting practice, which included regulatory and policy expertise spanning practice areas of grid planning, gas transition, DER integration, regulatory innovation, stakeholder engagement, and decarbonization strategies.
- Worked with state regulatory commissions, consumer advocates, non-profits, and other clients to advance the public interest in regulatory decision-making.
- Developed testimony, comments, reports, and analysis on several different topics, regulatory innovation, performance-based regulation, electric and gas resource planning, fuel costs, energy efficiency, and low-income ratepayer issues.

Associate Director, Navigant (n/k/a Guidehouse) (2018 – 2019)

- Supported electric utilities, energy companies, and regulators across numerous domains, including energy storage, power system planning, rate design, grid modernization, distributed energy resources, and development of new regulatory frameworks and business models.

Commission Counsel, Hawaii Public Utilities Commission (2014 – 2018)

- Led or supported numerous efforts involving power system planning, grid modernization, renewables integration, distributed energy resources, demand response, transportation electrification, and performance-based regulation (PBR).
- Served prominent role in Hawaii's groundbreaking PBR docket.
- Led team through process design, workshop facilitation, and execution of PBR docket.
- Supported various innovative programs that earned Hawaiian Electric Companies SEPA's 2018 Utility of the Year.

Senior Regulatory and Policy Analyst, Economic and Human Dimension Research Associates (2011 – 2015)

- Provided clients financial and policy analysis pertaining to the energy industry.

Expert Testimony

Green Mountain Power 2021 Multi-Year Rate Plan on Behalf of Green Mountain Power
Direct and Rebuttal Testimony

Filed testimony providing an independent evaluation of the Company's proposed Regulation Plan and proposed recommendations for improvements to the current Plan.

[Direct Testimony](#)

Selection of Relevant Experience

Connecticut Performance-Based Regulation Proceeding supporting Connecticut Public Utilities Regulatory Authority (PURA)

Technical and Policy Support

Provide technical and policy assistance to PURA Staff throughout the proceeding.

Innovative Energy Solutions (IES) Program (Regulatory Sandbox for Connecticut) supporting Connecticut Public Utilities Regulatory Authority (PURA)

Technical and Policy Support

Led a team to design and support the implementation of a regulatory framework and process that can create space for innovation and facilitate the deployment of a wide array of innovative technology applications and customer programs.

Community solar program design and analysis supporting Hawaii Public Utilities Commission (2020-2022).

Technical and Policy Support

As former lead architect of the Community-Based Renewable Energy (CBRE) Program for the State of Hawaii, advised and supported the Hawaii PUC in its efforts to design and implement a robust community solar program to meet the unique needs of Hawaii's island grids.

Virtual Net Metering Tariff Design and Analysis supporting Sacramento Municipal Utility District (2020-2021)

Technical and Policy Support

Supported SMUD in outlining a VNEM tariff framework and constructed a financial model to evaluate the customer value proposition for the proposed tariff as well as a comparative look at other California IOUs VNEM program offerings.

Planning considerations for energy storage in resilience applications supporting Pacific Northwest National Laboratory (PNNL) (2020)

Technical and Policy Support

Served as a co-author on a report with PNNL that, among other elements, identified key resilience themes impacting high-renewables grids and outlined four common principles shared by successfully deployed resilience projects: (1) resilience benefits are hyperlocal; (2) project feasibility is achieved by providing grid services; (3) local value drives each project; and (4) energy storage is a key enabling technology in resilience applications.

An open networks project for the United States to facilitate reliable, efficient integration of DERs into the Electric Power System (2021-2022)

[Report Series](#)

Led a consortium of subject matter experts to assess the DER integration issues across a variety of jurisdictions in the US, evaluate lessons learned from the UK and Australia Open Networks approaches to determine what may be applicable to the US, convene sustained discussions among relevant stakeholders on DER integration approaches, and develop consensus recommendations on how to maximize the potential of DERs in US power systems and wholesale markets.

Publications

Electricity Regulation for a Customer Centric Future. Report prepared by Guidehouse for Edison Electric Institute. 2020.

JB Twitchell, SF Newman, RS O’Neil, MT McDonnell. 2020. Planning Considerations for Energy Storage in Resilience Applications – Outcomes from the NELHA Energy Storage Conference’s Policy and Regulatory Workshop. PNNL-29738, Pacific Northwest National Laboratory, Richland, WA.

John A. “Skip” Laitner, Benoit Lebot, Matthew McDonnell, and Meagan Weiland. 2018. Smart Policies and Programs as Critical Drivers for Greater Energy Efficiency Investments. Analytical Manuscript prepared for International Partnership for Energy Efficiency Cooperation (IPEEC).

John A. “Skip” Laitner, Matthew McDonnell, and Ryan Keller. 2015. ICT-Enabled Intelligent Efficiency. Report prepared for Digital Energy and Sustainability Solutions Campaign (DESC).

Presentations

Matthew McDonnell (2019). AEE 2nd Annual Public Utility Commissioners Forum. Invited as an expert to speak on distribution system planning and performance-based regulation.

Matthew McDonnell (2019). NARU Annual Meeting, San Antonio. Invited to present on a panel moderated by NRRI, Susie Mora of Exelon, and Commissioner Abigail Anthony of Rhode Island, entitled “Performance-Based Regulation: Helping to Enable a Customer-Centric Future.”

Matthew McDonnell (2019). GridFWD. Invited to moderate a panel with representatives from Avista, Uplight, and Hawaiian Electric, entitled “Innovation and Regulation.”

Matthew McDonnell (2019). Hawaii Energy Conference. Invited to moderate a panel with Hawaii Governor David Ige, California PUC President Michael Picker, Hawaii Commissioner Jennifer Potter, and Rhode Island Commissioner Abigail Anthony, entitled “Moving Away from Convention: Innovations in Regulatory Policy.”

Matthew McDonnell (2018). Maui Energy Conference. Invited to moderate panel entitled “Regulating Carbon: The Best Solutions.”

Brad Cebulko

Partner * (317) 519-3165 * bcebulko@currentenergy.group

Education

Master of Public Administration

University of Washington - Seattle, WA (2012)

Bachelor of Arts Political Science

Colorado State University – Fort Collins, CO (2006)

Work Experience

Founding Partner, Current Energy Group, (May 2024 – Present)

- Works with consumer advocates and public interest organizations on gas and electric regulatory issues before state public utility commissions.

Founder, CEB Energy Consulting, (March 2024 – May 2024)

- Worked with consumer advocates and public interest organizations on gas and electric regulatory issues before state public utility commissions.

Senior Manager, Strategen Consulting, (2021 – March 2024)

- Led Strategen's gas transition practice, which included regulatory and legislative strategy, prudence reviews, and gas infrastructure planning.
- Worked with state regulatory commissions, consumer advocates, non-profits, and other clients to advance the public interest in regulatory decision-making.
- Developed testimony, comments, reports, and analysis on a subject matter including gas utility decarbonization strategies, performance-based regulation, electric and gas resource planning, fuel costs, energy efficiency, and low-income ratepayer issues.

Senior Policy Advisor for Energy Strategy, Washington Utilities and Transportation Commission (2016 – 2021)

- Advised the Commissioners on electric and gas utility regulation and legislation.

- Led major Commission policy initiatives through Commission orders, policy statements, and rulemakings, including developing rules for the Clean Energy Transformation Act.
- Chair of the Staff Subcommittee on International Relations at NARUC.

Regulatory Analyst, Washington Utilities and Transportation Commission (2013 – 2016)

- Testified before the commission in suspended utility filings and general rate case proceedings.
- Led Commission Staff's review of natural gas integrated resource plans and energy efficiency filings.

Expert Testimony

DTE Gas Company 2024 Rate Case (DKT: U-21291) on Behalf of The Ecology Center, The Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar

Direct and Rebuttal Testimony

Filed testimony examining the Company long-term capital investment strategy, proposal to end demand response pilots, and the benefits of customer mapping to ensure equitable gas service.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Northwest Natural Gas Company 2024 General Rate Case (DKT: UG 490) on Behalf of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club

Direct Testimony

Filed testimony recommending the Commission reject the Company's proposed line extension allowance modifications, disallow imprudent expenditures related to the line extension program, and reject the Company's proposal to increase the customer charge for new customers by more than 250 percent.

[Case Details](#) | [Direct Testimony](#)

Southern Connecticut Natural Gas Company and Connecticut Natural Gas Company 2024 Rate Case (DKT: 23-11-02) on Behalf of Sierra Club and Conservation Law Foundation

Direct and Rebuttal Testimony

Filed testimony examining the Companies capital investments plans and decarbonization programs.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Public Service Company of Colorado 2024-2028 Clean Heat Plan (DKT: 23A-0392EG) on Behalf Western Resource Advocates and Rewiring America (2024)

Testimony and Report

Filed a report and testimony examining the review the utility's capital investment plan, assessed the benefits of zonal electrification, assessed the capital and operation & maintenance (O&M) costs for blending hydrogen into the distribution system, and assessed the reasonableness of the Company's synthetic natural gas (SNG) assumptions.

PacifiCorp 2023 Washington General Rate Case (DKT: UE-230172) on Behalf of The Energy Project (2023)

Response Testimony

Filed testimony on the Company's proposed electric performance metrics. Proposed a more comprehensive portfolio of metrics that measures the utility's performance to provide affordable, clean, equitable, and reliable power.

[Case Details](#) | [Direct Testimony](#)

Northern Illinois Gas Company Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service (DKT: 23-0066) on Behalf of Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Illinois State Public Interest Research Group, Inc (2023)

Direct and Rebuttal Testimony

Filed testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and residential rate design.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

The Peoples Gas Light and Coke Company 2023 Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service (DKT: 23-0068 and 23-0069) on Behalf of Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Illinois State Public Interest Research Group, Inc. (2023)

Direct and Rebuttal testimony

Filed testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and residential rate design.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Avista 2023 Oregon Gas General Rate Case (DKT: UG-461) on Behalf of Sierra Club and Climate Solutions (2023)

Direct Testimony

Filed testimony on Avista's compliance plan for meeting Climate Protection Program compliance, non- pipeline alternatives, and line extension policy. Through settlement, Avista agreed to initiate non- pipeline alternative analysis in its integrated resource plan, phase out its line extension allowance policy by 2027, and delay seeking recovery of Climate Investment Cost Recovery.

[Case Details](#) | [Direct Testimony](#) | [Final Order](#)

Puget Sound Energy 2022 Electric and Gas General Rate Case (DKT: UE-220066, UG-220067, and UG- 210918) On Behalf of The Energy Project (2022)

Response Testimony

Filed testimony on Gas and Electric Performance Metrics and Electric Time-of-Use Rate Pilot. Through settlement, PSE agreed to modify its Time of Use pilot and track performance metrics that closely aligned with The Energy Project's proposals

[Case Details](#) | [Response Testimony](#) | [Settlement Testimony](#)

Liberty Utilities RNG Program (DKT 22-32) On Behalf of Sierra Club (2022)

Direct Testimony

Filed testimony recommending the Massachusetts Department of Public Utilities reject Liberty's proposed Voluntary Renewable Natural Gas Program because it was costly and the Company's proposal would have double counted the environmental attributes of the project. The Department of Public Utilities largely relied on Sierra Club's testimony when it reject the Company's proposed RNG program.

[Case Details](#) | [Direct](#)

PacifiCorp 2022 General Rate Case (DKT UE 399) On Behalf of Vitesse LLC (2022)

Direct and Rebuttal Testimony

Filed testimony on behalf of Vitesse LLC, a wholly owned subsidiary of Meta, on the proposed design of PacifiCorp's voluntary green tariff program for large customers. The Oregon PUC approved a multi-party settlement that made several revisions to the program based on my testimony.

[Case Details](#) | [Direct](#) | [Rebuttal](#)

Consumers Energy 2022 Natural Gas General Rate Case (DKT U-21148) On Behalf of Michigan Environmental Council, NRDC, and Sierra Club (2022)

Direct Testimony

Direct testimony on Company's proposal build and operate a RNG facility, and the Company's line extension allowance policy. Through settlement, the Company agreed not to seek recovery of the RNG facility and to update the utility's line extension allowance assumptions.

[Case Details](#) | [Direct](#)

Xcel Energy, Minnesota Energy Resources Corp, CenterPoint Energy (DKT: 21-138) On Behalf of Minnesota CUB (2021 – 2022)

Direct and Rebuttal Testimony

Filed direct and rebuttal testimony on the prudence of the three gas utilities extraordinary gas costs during Winter Storm Uri in 2021. The Minnesota PUC relied, in part, on Strategen's testimony to find nearly \$60 million in imprudent costs for the gas utilities. The Commission also accepted Strategen's recommendation to initiate gas utility long-term planning.

[Case Details](#) | [Direct](#)

Puget Sound Energy Proposed Leasing Program (DKT: UE-151871/UG-151872) On Behalf of Washington UTC Staff (2016)

Filed direct testimony opposing the Company's proposed end-use appliance leasing program for not being in the public interest. The Commission agreed that the program was poorly structured and was unlikely to benefit participants and non-participants

[Case Details](#) | [Direct](#)

Avista 2015 General Rate Case (Dockets UE-150204/UG-150205) On Behalf of Washington UTC Staff (2015)

General Rate Case

[Case Details](#) | [Direct](#)

Avista 2014 General Rate Case (Dockets UE-140188/UG-140189) On Behalf of Washington UTC Staff (2014)

General Rate Case

[Case Details](#) | [Direct](#)

Selection of Relevant Experience

Illinois Future of Gas Proceeding on Behalf of NRDC

Technical and Policy Support

Providing technical and policy assistance through written comments and participation in workshops to the client over the course of Illinois Commerce Commission's Future of Gas investigation

Puget Sound Energy 2025 Gas and Electric Integrated Resource Plans on Behalf of Climate Solutions, Renewable Northwest.

Technical and Policy Support

Providing technical and policy assistance to the clients during their participation in the PSE IRP stakeholder work sessions.

Tennessee Valley Authority 2024 Integrated Resource Plan on Behalf of GridLab and The Nature Conservancy (2024)

Technical and Policy Support

Providing technical and policy assistance to The Nature Conservancy during its participation in the TVA IRP stakeholder work sessions.

Nevada Public Utilities Commission Natural Gas Utility Integrated Resource Planning Rulemaking on Behalf of Western Resource Advocates (2024)

Technical and Policy Support

Providing technical and policy assistance to Western Resource Advocates in its participation in the PUCN's rulemaking. Drafted proposed comprehensive rules and supporting arguments.

A Regulator's Blueprint for 21st Century Gas Utility Planning, A Report for Advanced Energy United (2023)

[Report](#)

Led the development of a report that provided a blueprint for state public utility commissions that are interested in developing gas utility planning requirements to improve transparency into gas utility resource and capital investment plans.

New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation Initial Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2024)

A Review of the Initial Long-Term Plan

Developed a report that analyzed the Companies' alternative fuel assumptions, electrification costs, capital forecast, technological assumptions for electrification technologies, benefit-cost analysis, and implementation of non-pipeline alternatives ("NPAs").

Comments on CenterPoint Energy's Natural Gas Innovation Act (NGIA) Pilots in Minnesota on Behalf of Fresh Energy (2023)

Comments

Provided technical support and comments to client on components of CenterPoint's filing including its proposed hydrogen blending facility, an RFP for renewable natural gas, and residential and commercial gas heat pump pilots.

Minnesota Public Utilities Commission Investigation into Gas Utility Resource Planning on Behalf of the Citizen's Utility Board of Minnesota (2023)

[Comments](#)

Providing technical support to client on the Minnesota Commission's consideration of natural gas utility long-term planning.

Nonpipeline Alternative Analysis Framework for the Colorado Public Utilities Commission on Behalf of Lawrence Berkeley National Laboratory (2023)

[Part 1 | Non-Pipeline Alternative to Natural Gas Utility Infrastructure Report](#)

[Part 2 | Non-Pipeline Alternatives: A Regulatory Framework and a Case Study of Colorado](#)

Through a collaboration with Lawrence Berkeley National Laboratory and the Colorado Public Utilities Commission, I led the development of two reports that first examined the existing regulatory approaches for non-pipeline alternatives, and then proposed a regulatory framework.

Comments to the Oregon Public Utilities Commission on Northwest Natural Gas Company's 2022 Integrated Resource Plan on Behalf of Coalition of Climate Advocates (2023)

[Natural Gas IRP](#)

Provided technical support to a coalition of climate-focused organizations, and frontline community organizations, on the gas utility's plans for meeting future customer demand while complying with Oregon and Washington emissions reductions requirements.

Consolidated Edison and Orange & Rockland's 2023 Initial Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2023)

[A Review of the Initial Long-Term Plan](#)

Provided a review of the gas utilities' initial Long-Term Plan with a focus on electrification assumptions, alignment of capital investment spending and load forecast, nonpipeline alternative analysis, and reasonableness of scenarios for meeting emissions reduction requirements.

National Fuel Gas Distribution Corporation 2023 Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2023)

[Comments on Electrification Assumptions](#)

Provided comments on NFG's technological and cost assumptions for various electrification technologies, cost basis for the crossover temperature for heat pumps, and electrification adoption curves. Strategen then proposed several recommendations for adjustments that NFG could make in this proceeding, or future LTPs, to better represent the technical capacity and emission reduction potential of electrified heating systems.

Consumers Energy Gas Bill Impact Analysis: A Case Study of the Effects of Planned Capital Expenditures and Electrification Trends on Behalf of Advanced Energy United (2023)

[White Paper](#)

Quantified the impact of gas utility capital improvement projects on customer rates Consumers Energy gas in Michigan. The paper found that Michigan residential customers with Consumers Energy can expect to see their gas bills steadily increase over the next decade – up to 49% over 2021 levels – due to projected utility capital expenditures and electrification trends.

White Paper on the Relationship of Gas and Electricity Prices in New England on Behalf of Sierra Club (2023)

[White Paper](#)

Co-authored a white paper that provides background and context on the implications of recent electricity price spikes in New England and the relationship between natural gas prices and electricity prices.

Nevada Gas Utility Decarbonization Planning 2022 Legislative Proposals on Behalf of GridLab and SWEEP (2023)

Technical and Policy Advice

Providing a coalition of climate-focused advocates with technical and policy guidance on legislation for gas planning requirements

Presentations to Western States on Planning for Decarbonizing Gas Utilities on Behalf of Advanced Energy United (2022-2023)

Presentations

Led Strategen's collaboration with AEU to develop a series of presentations for Western State Public Utility Commission commissioners on how to plan for the decarbonization transition of natural gas utilities.

Designing Building Electrification Incentives for Washington State on Behalf of Climate Solutions (2022)

Technical and Policy Advice

Developed funding scenarios that would allow Washington State to meet building decarbonization targets. Solutions focused on rebates for high-efficiency electric appliance retrofits and community- centered weatherization programs.

Washington Utilities and Transportation Commission Proceeding to Develop a Policy Statement Addressing Alternatives to Traditional Cost of Service Rate Making, (DKT: U-210590) On Behalf of The Energy Project (2022)

Policy Statement

Supported client, the low-income advocate in Washington, on comments on regulatory goals, outcomes, and performance metrics.

[Case Details](#) | [Comments](#)

Comments to the Minnesota Public Utilities Commission on Natural Gas Planning (DKT: 21-135) On Behalf of Citizens Utility Board of Minnesota (2022)

[Comments](#)

Provided technical and policy guidance to the Minnesota Commission on how gas planning, operational changes, and risk sharing can help protect customers from future natural gas price spikes like that occurred during February 2021.

Puget Sound Energy 2023 Natural Gas Integrated Resource Plan on Behalf of Climate Solutions (2023)

Natural Gas IRP

Supported client's review of the Company's development of the inputs and assumptions used in the IRP.

Michigan Public Service Commission, Renewable Natural Gas Study Workgroup (DKT: U-21170) On Behalf of Michigan Environmental Council, NRDC, and Sierra Club (2022)

Workgroup

Supported clients' review of the development of the study including submitting comments to the PSC.

Kentucky Utilities and Louisville Gas and Electric Company General Rate Case (DKT: 2020-00350) On Behalf of the Kentucky Public Service Commission (2021-2022)

General Rate Case

Supported the Kentucky PSC evaluate testimonies on PURPA rates and set new rates for the utilities.

[Case Details](#) | [Final Order](#)

Minnesota Power 2021 Integrated Resource Plan (DKT: 21-33) On Behalf of Citizen Utility Board of Minnesota (2022)

Electric IRP

Supported client's review of the Company's IRP.

[Case Details](#) | [Comments](#)