

# Elson Advocacy

June 13, 2025

**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**

Enclosed please find the cost claim of Environmental Defence Canada in the above proceeding.

The cost claim includes the fees for the expert consultants from the Current Energy Group.  
Those fees are well below the estimate provided to the OEB.

The fees associated with the expert reports are also within the estimate provided to the OEB.

Environmental Defence and the Green Energy Coalition coordinated extremely closely in this matter to reduce overall costs. Much of the legal work included in this claim was completed on behalf of both.

We respectfully request that this claim be approved in full.

Yours truly,



Kent Elson

cc: Parties to the above proceeding

EB-2024-0111 : 1 : Kent Elson

COST CLAIM NUMBER 2780	SUBMISSION DEADLINE DATE June 13, 2025	CLAIM STATUS Approved by Finance
EB# EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.	OTHER EB#S	PHASE #* 1
INTERVENOR Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	INTERVENOR COMPANY* Environmental Defence Canada Inc., Toronto: Corporation	INTERVENOR TYPE Full Registrant
HST RATE ONTARIO 13.00	EXCHANGE RATE	COUNTRY Canada
HST NUMBER 872151923RT0001	LATE SUBMISSION ALLOWED No	EXTENSION DEADLINE DATE

PARTICIPANTS

			Total (\$)	Total Hours	Participant Claim Status
New	Non-Filing Participant First, Last Name	Filing Participant			
No	,	Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	92,650.76	270.60	Submitted
Yes	Kate , Siemiatycki		285.89	1.00	Submitted
Yes	Matt & Brad , McDonnell & Cebulko		58,782.00	194.00	Submitted

ATTACHMENTS

Attachment	Document Type	Import Message
ED_CostsCvrLtr_20250613.pdf	Cover Letter	
ED EB-2024-0111 Cost Claim 061320251915.pdf		

TOTAL LEGAL/CONSULTANT/OTHER FEES  
141,026.80

TOTAL DISBURSEMENTS  
0.00

TOTAL HST  
10,691.85

TOTAL CLAIM  
151,718.65

TOTAL AMOUNT AWARDED

TOTAL HOURS CLAIMED  
465.60

TOTAL HOURS DISALLOWED

REASON FOR  
DISALLOWANCE

REASON FOR  
DISALLOWANCE - 2

REASON FOR  
DISALLOWANCE - 3

MAKE CHEQUE PAYABLE TO  
Elson Advocacy, In Trust

SEND PAYMENT TO ADDRESS  
1062 College Street  
Toronto, Ontario  
M6H1A9

ATTENTION

SUBMIT SECTION

I am a representative of the Party. I have examined all of the documentation in support of this cost claim. The costs incurred and time spent are directly related to the Party's participation in the OEB Process referred to above.

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 section 6.05 and 6.09 of the OEB's Practice Direction on Cost Awards.

The information (fees and disbursements) filed in this cost claim is complete and accurate and in accordance with the OEB's Practice Direction for Cost Awards and Appendix A, the Cost Awards Tariff.

SUBMITTED BY  
Kent Elson

DATE SUBMITTED  
June 13, 2025

<b>CASE</b> EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.	<b>COST CLAIM</b> EB-2024-0111 : 1 : Kent Elson	<b>INTERVENOR NAME</b> Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	<b>PARTICIPANT CLAIM STATUS</b> Submitted
<b>FILING PARTICIPANT</b> Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	<b>NEW PARTICIPANT</b> No	<b>NON-FILING PARTICIPANT F. NAME</b>	<b>NON-FILING PARTICIPANT L. NAME</b>
<b>SERVICE PROVIDER TYPE*</b> Legal Counsel	<b>YEAR CALLED TO BAR*</b> 2009	<b>COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE*</b> 15	<b>HOURLY RATE</b> 303
<b>HST RATE CHARGED*</b> 13.00	<b>CV STATUS (FOR CONSULTANT/ANALYST)</b> CV Required	<b>LAST CV DATE</b>	<b>OVERRIDE HOURLY RATE</b> No
<b>HST NUMBER</b> 872151923RT0001	<b>HEARINGS</b> Yes	<b>CONSULTATIONS</b> No	<b>DISBURSEMENTS</b> No

## HEARINGS

Hearings Hours	Hearings Subtotal (\$)		Hearings Total Tax (\$)		Hearings Total (\$)	
270.60	81,991.80		10,658.96		92,650.76	
<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
DISCOVERY						
Read and Research Application and Evidence	5.00	303	1,515.00	13.00	196.95	1,711.95
Preparation of Interrogatories	23.20	303	7,029.60	13.00	913.85	7,943.45
Review Interrogatory Responses	5.00	303	1,515.00	13.00	196.95	1,711.95
Technical Conference Preparation	0.20	303	60.60	13.00	7.88	68.48
Technical Conference Attendance	7.20	303	2,181.60	13.00	283.61	2,465.21
Technical Conference Follow-up	2.50	303	757.50	13.00	98.48	855.98
Subtotal of DISCOVERY	43.10		13,059.30		1,697.72	14,757.02
PROCEDURAL						
Preparation of Issues List Submission		303		13.00		
Attendance at Issues List Conference		303		13.00		
Preparation for a Confidentiality Request		303		13.00		
Prepare Submissions on Confidentiality		303		13.00		
Preparation of Motion(s) Materials	7.10	303	2,151.30	13.00	279.67	2,430.97
Prepare Submissions on the Motion(s)		303		13.00		
Attendance at Hearing on Motion(s)	7.00	303	2,121.00	13.00	275.73	2,396.73
Review Procedural Documents		303		13.00		

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
<b>Subtotal of PROCEDURAL</b>	<b>14.10</b>		<b>4,272.30</b>		<b>555.40</b>	<b>4,827.70</b>
<b>INTERVENOR EVIDENCE</b>						
Preparation of Intervenor Evidence	12.20	303	3,696.60	13.00	480.56	4,177.16
Interrogatory Responses	10.60	303	3,211.80	13.00	417.53	3,629.33
Preparation of Witness(es) for Attendance at Hearing	3.00	303	909.00	13.00	118.17	1,027.17
<b>Subtotal of INTERVENOR EVIDENCE</b>	<b>25.80</b>		<b>7,817.40</b>		<b>1,016.26</b>	<b>8,833.66</b>
<b>SETTLEMENT CONFERENCE</b>						
Preparation for Settlement Conference	13.20	303	3,999.60	13.00	519.95	4,519.55
Attendance at Settlement Conference	53.40	303	16,180.20	13.00	2,103.43	18,283.63
Preparation of Settlement Proposal	1.50	303	454.50	13.00	59.09	513.59
Attendance at Presentation to Panel		303		13.00		
<b>Subtotal of SETTLEMENT CONFERENCE</b>	<b>68.10</b>		<b>20,634.30</b>		<b>2,682.47</b>	<b>23,316.77</b>
<b>WRITTEN ARGUMENT</b>						
Written Submissions	61.20	303	18,543.60	13.00	2,410.67	20,954.27
<b>Subtotal of WRITTEN ARGUMENT</b>	<b>61.20</b>		<b>18,543.60</b>		<b>2,410.67</b>	<b>20,954.27</b>
<b>ORAL ARGUMENT</b>						
Preparation for Oral Hearing	39.10	303	11,847.30	13.00	1,540.15	13,387.45
Attendance at Oral Hearing	19.00	303	5,757.00	13.00	748.41	6,505.41
Oral Submissions		303		13.00		
Attendance at Oral Submissions		303		13.00		
<b>Subtotal of ORAL ARGUMENT</b>	<b>58.10</b>		<b>17,604.30</b>		<b>2,288.56</b>	<b>19,892.86</b>
<b>DECISION</b>						
Review Decision		303		13.00		
Review Rate/Accounting Order	0.20	303	60.60	13.00	7.88	68.48
Prepare Submission on Rate Order		303		13.00		
<b>Subtotal of DECISION</b>	<b>0.20</b>		<b>60.60</b>		<b>7.88</b>	<b>68.48</b>
<b>OTHER</b>						
Other Attendance (e.g., Intervenor Conferences)		303		13.00		
<b>Subtotal of OTHER</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>TOTAL SERVICE PROVIDER FEES</b>						
<b>Total Service Provider Fees</b>	<b>270.60</b>		<b>81,991.80</b>		<b>10,658.96</b>	<b>92,650.76</b>

## Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
EA_InvoiceDockets_20250613.pdf	Time Docket and Invoice	

## Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
EA_InvoiceDockets_20250613.pdf	Time Docket and Invoice	Hearings	

# Elson Advocacy

## Invoice

Environmental Defence  
33 Cecil Street  
Toronto, ON  
M5T 1N1

June 13, 2025

File #: 0151  
Inv #: 1431

**RE:** Enbridge rebasing case (2023)

DATE	DESCRIPTION	HOURS	LAWYER
Jun 2, 2024	Review procedural order; diarize deadlines; correspond with potential experts	0.70	KE
Jun 4, 2024	Review phase 2 evidence and prepare IRs;	0.50	KE
Jun 5, 2024	Review application and prepare IRs	1.00	KE
Jun 6, 2024	Review application and prepare IRs; correspond with potential expert witness; call with potential expert witness	1.60	KE
Jun 7, 2024	Review application; draft interrogatories; draft proposed evidence letter	5.00	KE
Jun 10, 2024	Draft IRs; draft EFG evidence proposal	1.50	KE
Jun 11, 2024	Review evidence and draft IRs	3.00	KE
Jun 17, 2024	Review procedural order; various correspondence; draft IRs	1.00	KE
Jun 18, 2024	Prepare IRs	4.70	KE
Jun 19, 2024	Draft IRs; calls re IRs	4.50	KE
Jun 24, 2024	Call with M. McDonnell	1.00	KE
Jul 5, 2024	Draft supplementary IR	0.40	KE

Jul 11, 2024	Review IRs	1.50	KE
Jul 12, 2024	Call with expert	1.00	KE
Jul 15, 2024	Various correspondence	0.10	KE
Jul 17, 2024	Review IRs; prepare technical conference time estimate	3.40	KE
Jul 19, 2024	Correspondence re technical conference questions	0.20	KE
Jul 22, 2024	Prepare for technical conference; attend technical conference	3.20	KE
Jul 23, 2024	Prepare questions for technical conference; attend technical conference	4.00	KE
Jul 24, 2024	Review transcript; draft correspondence responding to Enbridge submissions	2.00	KE
Jul 26, 2024	Call with C. Neme	0.30	KE
Jul 29, 2024	Review Enbridge submissions re issue 18; consider whether a response is required	0.20	KE
Jul 30, 2024	Review EFG report and provide comments	3.00	KE
Jul 31, 2024	Various correspondence; call with EFG	1.00	KE
Aug 5, 2024	Call with C. Neme; review report	1.20	KE
Aug 6, 2024	Review and comment on IRM expert report	2.20	KE
Aug 7, 2024	Review and comment on CEG report; review and comment on EFG report; call with CEG	2.00	KE
Aug 12, 2024	Review and comment on CEG report; submit report	0.80	KE
Aug 22, 2024	Correspondence re ADR	0.10	KE
Sep 1, 2024	Review and comment on EFG IRRs	4.80	KE
Sep 3, 2024	Review and comment on EFG IRs; review and comment on CEG IRs	4.00	KE
Sep 4, 2024	Call with EFG	1.50	KE

Sep 5, 2024	Prepare for settlement conference; call with CEG; various correspondence	2.00	KE
Sep 6, 2024	Prepare for ADR (e.g. pre-ADR questions, coordinate with intervenors, etc.); review undertaking responses; assist EFG/CEG with IRR finalization	4.00	KE
Sep 7, 2024	Correspondence re CCC IRs	0.30	KE
Sep 10, 2024	Attend ADR (7 hr); prepare for ADR tomorrow (1 hr)	8.00	KE
Sep 11, 2024	Prepare for ADR (.3); attend ADR (7.5); prepare for ADR tomorrow (.3)	8.10	KE
Sep 12, 2024	Attend ADR	3.00	KE
Sep 13, 2024	Attend ADR	4.00	KE
Sep 16, 2024	Prepare ADR proposals; various correspondence re ADR	2.00	KE
Sep 17, 2024	Correspondence re ADR; attend ADR	0.40	KE
Sep 18, 2024	Attend ADR	4.00	KE
Sep 19, 2024	Attend ADR; follow-up on ADR in preparation for tomorrow	5.00	KE
Sep 20, 2024	Prepare for ADR; attend ADR	4.50	KE
Sep 23, 2024	Various correspondence	0.30	KE
Sep 27, 2024	Review procedural order; various correspondence re hearing planning for November 19th	0.30	KE
Oct 3, 2024	ADR correspondence	0.20	KE
Oct 6, 2024	Correspondence in preparation for ADR tomorrow	1.00	KE
Oct 7, 2024	Prepare for ADR; attend ADR	7.50	KE
Oct 8, 2024	Prepare for ADR; attend ADR	6.00	KE
Oct 9, 2024	Attend settlement conference	4.50	KE



Oct 10, 2024	Various ADR correspondence; review materials re RNG; call with CEG	2.00	KE
Oct 15, 2024	Call with Enbridge; review and comment on interrogatory responses; various correspondence	1.00	KE
Oct 16, 2024	Various correspondence	0.10	KE
Oct 17, 2024	Various correspondence	0.10	KE
Oct 18, 2024	Various correspondents and planning re upcoming hearing	1.00	KE
Oct 21, 2024	Prepare motion materials re further interrogatory responses; various correspondence	0.70	KE
Oct 22, 2024	Prepare for hearing; review and comment on draft settlement agreement	2.50	KE
Oct 28, 2024	Review draft accounting orders	0.20	KE
Oct 30, 2024	Review and comment on adr terms	0.50	KE
Nov 4, 2024	Review ADR wording; finalize notice of motion; various correspondence	1.00	KE
Nov 5, 2024	Various correspondence	0.20	KE
Nov 6, 2024	Various correspondence	0.20	KE
Nov 11, 2024	Call re intervenor coordination	1.00	KE
Nov 15, 2024	Review filings	1.00	KE
Nov 16, 2024	Review filings; prepare for motion hearing	2.00	KE
Nov 17, 2024	Review filings; prepare for motion hearing	6.00	KE
Nov 18, 2024	Prepare submissions for motion hearing; attend motion hearing; attend settlement presentation	7.00	KE
Nov 19, 2024	Hearing preparation	1.50	KE
Nov 21, 2024	Various correspondence re hearing	0.20	KE
Nov 22, 2024	Correspondence re hearing	0.10	KE

Nov 25, 2024	Call with CEG re motion issues	1.00	KE
Nov 26, 2024	Hearing preparation	0.60	KE
	Prepare correspondence re hearing; prepare correspondence re marketing ramp-up	2.00	KE
Dec 2, 2024	Prepare for hearing; submit time estimates	1.40	KE
Dec 3, 2024	Review Enbridge letter re hearing issues; draft response	1.00	KE
Dec 4, 2024	Draft response to Enbridge procedural requests	1.50	KE
Dec 6, 2024	Review Procedural Order #9; various correspondence	0.40	KE
Dec 9, 2024	Prepare for hearing	3.50	KE
Dec 10, 2024	Prepare for hearing	1.50	KE
Dec 11, 2024	Prepare for hearing	1.50	KE
Dec 13, 2024	Prepare for hearing; correspondence re hearing; hearing preparation meeting with EFG (1.5 hrs); hearing preparation meeting with CEG (1.5 hrs);	5.50	KE
Dec 14, 2024	Prepare for hearing	3.00	KE
Dec 16, 2024	Prepare for hearing	0.30	KE
	Prepare for hearing	6.00	KE
Dec 17, 2024	Prepare for hearing (2 hr); attend hearing (7 hr); prepare for hearing (1 hr)	10.00	KE
Dec 18, 2024	Prepare for hearing (1.5 hrs); attend hearing (5.5); prepare for tomorrow's hearing (1.5)	8.50	KE
Dec 19, 2024	Prepare for hearing (.4); attend hearing (6.5)	6.90	KE
Dec 20, 2024	Prepare submissions on the expert issue	2.00	KE
Dec 30, 2024	Correspondence re hearing follow-up	0.30	KE
Jan 2, 2025	Correspondence re undertaking response	0.20	KE

Jan 7, 2025	Various hearing follow-up	1.50	KE
Jan 8, 2025	Hearing follow-up; confer with C. Neme, D. Hill and A. Montgomery	0.60	KE
Jan 10, 2025	Hearing follow up	0.20	KE
Jan 11, 2025	Correspondence re PO 10 and the submission deadline	0.30	KE
Jan 14, 2025	Hearing follow-up	0.40	KE
Jan 17, 2025	Hearing follow-up	0.50	KE
Jan 23, 2025	Draft submissions	3.00	KE
Jan 24, 2025	Draft submissions	7.00	KE
Jan 25, 2025	Draft submissions	2.50	KE
Jan 26, 2025	Draft submissions	4.00	KE
Jan 27, 2025	Draft submissions	9.00	KE
	Draft submissions	1.00	KS
Feb 12, 2025	Prepare submissions re RNG	6.00	KE
Feb 13, 2025	Draft submissions; various correspondence	4.10	KE
Feb 18, 2025	Review and revise RNG submissions	0.40	KE
Feb 20, 2025	Review submissions	1.20	KE
Feb 24, 2025	Various correspondence	0.10	KE
Feb 27, 2025	Review submissions of other parties and prepare reply submissions	2.00	KE
Mar 3, 2025	Prepare submissions	0.20	KE
Mar 4, 2025	Draft reply	0.50	KE
Mar 5, 2025	Draft reply	5.00	KE

Mar 6, 2025	Draft reply submissions	10.00	KE
Mar 17, 2025	Review reply submissions	0.20	KE
	Total Hours and Fees	271.60	\$82,244.80
	Total HST on Fees		\$10,691.82
<b>TOTALS</b>			
	Total Fees & Disbursements		\$82,244.80
	Total HST		\$10,691.82
	Total Fees, Disbursements, & HST		\$92,936.62
	<b>Amount Now Due</b>		<b>\$92,936.62</b>
HST #	75532 3078 RT0001		
Total HST	\$10,691.82		

**Kate Siemiatycki**

<b>CASE</b> EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.	<b>COST CLAIM</b> EB-2024-0111 : 1 : Kent Elson	<b>INTERVENOR NAME</b> Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	<b>PARTICIPANT CLAIM STATUS</b> Submitted
<b>FILING PARTICIPANT</b>	<b>NEW PARTICIPANT</b> Yes	<b>NON-FILING PARTICIPANT F. NAME</b> Kate	<b>NON-FILING PARTICIPANT L. NAME</b> Siemiatycki
<b>SERVICE PROVIDER TYPE*</b> Legal Counsel	<b>YEAR CALLED TO BAR*</b> 2018	<b>COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE*</b> 7	<b>HOURLY RATE</b> 253
<b>HST RATE CHARGED*</b> 13.00	<b>CV STATUS (FOR CONSULTANT/ANALYST)</b> CV Required	<b>LAST CV DATE</b>	<b>OVERRIDE HOURLY RATE</b> No
<b>HST NUMBER</b> 872151923RT0001	<b>HEARINGS</b> Yes	<b>CONSULTATIONS</b> No	<b>DISBURSEMENTS</b> No

**HEARINGS**

<b>Hearings Hours</b>	<b>Hearings Subtotal (\$)</b>	<b>Hearings Total Tax (\$)</b>	<b>Hearings Total (\$)</b>			
1.00	253.00	32.89	285.89			
<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Sub Total</u></b>	<b><u>HST Rate</u></b>	<b><u>HST</u></b>	<b><u>Total</u></b>
<b>DISCOVERY</b>						
Read and Research Application and Evidence		253		13.00		
Preparation of Interrogatories		253		13.00		
Review Interrogatory Responses		253		13.00		
Technical Conference Preparation		253		13.00		
Technical Conference Attendance		253		13.00		
Technical Conference Follow-up		253		13.00		
<b>Subtotal of DISCOVERY</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>PROCEDURAL</b>						
Preparation of Issues List Submission		253		13.00		
Attendance at Issues List Conference		253		13.00		
Preparation for a Confidentiality Request		253		13.00		
Prepare Submissions on Confidentiality		253		13.00		
Preparation of Motion(s) Materials		253		13.00		
Prepare Submissions on the Motion(s)		253		13.00		
Attendance at Hearing on Motion(s)		253		13.00		
Review Procedural Documents		253		13.00		

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
<b>Subtotal of PROCEDURAL</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>INTERVENOR EVIDENCE</b>						
Preparation of Intervenor Evidence		253		13.00		
Interrogatory Responses		253		13.00		
Preparation of Witness(es) for Attendance at Hearing		253		13.00		
<b>Subtotal of INTERVENOR EVIDENCE</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>SETTLEMENT CONFERENCE</b>						
Preparation for Settlement Conference		253		13.00		
Attendance at Settlement Conference		253		13.00		
Preparation of Settlement Proposal		253		13.00		
Attendance at Presentation to Panel		253		13.00		
<b>Subtotal of SETTLEMENT CONFERENCE</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>WRITTEN ARGUMENT</b>						
Written Submissions	1.00	253	253.00	13.00	32.89	285.89
<b>Subtotal of WRITTEN ARGUMENT</b>	<b>1.00</b>		<b>253.00</b>		<b>32.89</b>	<b>285.89</b>
<b>ORAL ARGUMENT</b>						
Preparation for Oral Hearing		253		13.00		
Attendance at Oral Hearing		253		13.00		
Oral Submissions		253		13.00		
Attendance at Oral Submissions		253		13.00		
<b>Subtotal of ORAL ARGUMENT</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>DECISION</b>						
Review Decision		253		13.00		
Review Rate/Accounting Order		253		13.00		
Prepare Submission on Rate Order		253		13.00		
<b>Subtotal of DECISION</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>OTHER</b>						
Other Attendance (e.g., Intervenor Conferences)		253		13.00		
<b>Subtotal of OTHER</b>	<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	<b>0.00</b>
<b>TOTAL SERVICE PROVIDER FEES</b>						
<b>Total Service Provider Fees</b>	<b>1.00</b>		<b>253.00</b>		<b>32.89</b>	<b>285.89</b>

## Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
EA_InvoiceDockets_20250613.pdf	Time Docket and Invoice	

## Hearings, Consultations, Disbursements Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
EA_InvoiceDockets_20250613.pdf	Time Docket and Invoice	Hearings	

# Elson Advocacy

## Invoice

Environmental Defence  
33 Cecil Street  
Toronto, ON  
M5T 1N1

June 13, 2025

File #: 0151  
Inv #: 1431

**RE:** Enbridge rebasing case (2023)

DATE	DESCRIPTION	HOURS	LAWYER
Jun 2, 2024	Review procedural order; diarize deadlines; correspond with potential experts	0.70	KE
Jun 4, 2024	Review phase 2 evidence and prepare IRs;	0.50	KE
Jun 5, 2024	Review application and prepare IRs	1.00	KE
Jun 6, 2024	Review application and prepare IRs; correspond with potential expert witness; call with potential expert witness	1.60	KE
Jun 7, 2024	Review application; draft interrogatories; draft proposed evidence letter	5.00	KE
Jun 10, 2024	Draft IRs; draft EFG evidence proposal	1.50	KE
Jun 11, 2024	Review evidence and draft IRs	3.00	KE
Jun 17, 2024	Review procedural order; various correspondence; draft IRs	1.00	KE
Jun 18, 2024	Prepare IRs	4.70	KE
Jun 19, 2024	Draft IRs; calls re IRs	4.50	KE
Jun 24, 2024	Call with M. McDonnell	1.00	KE
Jul 5, 2024	Draft supplementary IR	0.40	KE

Jul 11, 2024	Review IRs	1.50	KE
Jul 12, 2024	Call with expert	1.00	KE
Jul 15, 2024	Various correspondence	0.10	KE
Jul 17, 2024	Review IRs; prepare technical conference time estimate	3.40	KE
Jul 19, 2024	Correspondence re technical conference questions	0.20	KE
Jul 22, 2024	Prepare for technical conference; attend technical conference	3.20	KE
Jul 23, 2024	Prepare questions for technical conference; attend technical conference	4.00	KE
Jul 24, 2024	Review transcript; draft correspondence responding to Enbridge submissions	2.00	KE
Jul 26, 2024	Call with C. Neme	0.30	KE
Jul 29, 2024	Review Enbridge submissions re issue 18; consider whether a response is required	0.20	KE
Jul 30, 2024	Review EFG report and provide comments	3.00	KE
Jul 31, 2024	Various correspondence; call with EFG	1.00	KE
Aug 5, 2024	Call with C. Neme; review report	1.20	KE
Aug 6, 2024	Review and comment on IRM expert report	2.20	KE
Aug 7, 2024	Review and comment on CEG report; review and comment on EFG report; call with CEG	2.00	KE
Aug 12, 2024	Review and comment on CEG report; submit report	0.80	KE
Aug 22, 2024	Correspondence re ADR	0.10	KE
Sep 1, 2024	Review and comment on EFG IRRs	4.80	KE
Sep 3, 2024	Review and comment on EFG IRs; review and comment on CEG IRs	4.00	KE
Sep 4, 2024	Call with EFG	1.50	KE



Sep 5, 2024	Prepare for settlement conference; call with CEG; various correspondence	2.00	KE
Sep 6, 2024	Prepare for ADR (e.g. pre-ADR questions, coordinate with intervenors, etc.); review undertaking responses; assist EFG/CEG with IRR finalization	4.00	KE
Sep 7, 2024	Correspondence re CCC IRs	0.30	KE
Sep 10, 2024	Attend ADR (7 hr); prepare for ADR tomorrow (1 hr)	8.00	KE
Sep 11, 2024	Prepare for ADR (.3); attend ADR (7.5); prepare for ADR tomorrow (.3)	8.10	KE
Sep 12, 2024	Attend ADR	3.00	KE
Sep 13, 2024	Attend ADR	4.00	KE
Sep 16, 2024	Prepare ADR proposals; various correspondence re ADR	2.00	KE
Sep 17, 2024	Correspondence re ADR; attend ADR	0.40	KE
Sep 18, 2024	Attend ADR	4.00	KE
Sep 19, 2024	Attend ADR; follow-up on ADR in preparation for tomorrow	5.00	KE
Sep 20, 2024	Prepare for ADR; attend ADR	4.50	KE
Sep 23, 2024	Various correspondence	0.30	KE
Sep 27, 2024	Review procedural order; various correspondence re hearing planning for November 19th	0.30	KE
Oct 3, 2024	ADR correspondence	0.20	KE
Oct 6, 2024	Correspondence in preparation for ADR tomorrow	1.00	KE
Oct 7, 2024	Prepare for ADR; attend ADR	7.50	KE
Oct 8, 2024	Prepare for ADR; attend ADR	6.00	KE
Oct 9, 2024	Attend settlement conference	4.50	KE

Oct 10, 2024	Various ADR correspondence; review materials re RNG; call with CEG	2.00	KE
Oct 15, 2024	Call with Enbridge; review and comment on interrogatory responses; various correspondence	1.00	KE
Oct 16, 2024	Various correspondence	0.10	KE
Oct 17, 2024	Various correspondence	0.10	KE
Oct 18, 2024	Various correspondents and planning re upcoming hearing	1.00	KE
Oct 21, 2024	Prepare motion materials re further interrogatory responses; various correspondence	0.70	KE
Oct 22, 2024	Prepare for hearing; review and comment on draft settlement agreement	2.50	KE
Oct 28, 2024	Review draft accounting orders	0.20	KE
Oct 30, 2024	Review and comment on adr terms	0.50	KE
Nov 4, 2024	Review ADR wording; finalize notice of motion; various correspondence	1.00	KE
Nov 5, 2024	Various correspondence	0.20	KE
Nov 6, 2024	Various correspondence	0.20	KE
Nov 11, 2024	Call re intervenor coordination	1.00	KE
Nov 15, 2024	Review filings	1.00	KE
Nov 16, 2024	Review filings; prepare for motion hearing	2.00	KE
Nov 17, 2024	Review filings; prepare for motion hearing	6.00	KE
Nov 18, 2024	Prepare submissions for motion hearing; attend motion hearing; attend settlement presentation	7.00	KE
Nov 19, 2024	Hearing preparation	1.50	KE
Nov 21, 2024	Various correspondence re hearing	0.20	KE
Nov 22, 2024	Correspondence re hearing	0.10	KE

Nov 25, 2024	Call with CEG re motion issues	1.00	KE
Nov 26, 2024	Hearing preparation	0.60	KE
	Prepare correspondence re hearing; prepare correspondence re marketing ramp-up	2.00	KE
Dec 2, 2024	Prepare for hearing; submit time estimates	1.40	KE
Dec 3, 2024	Review Enbridge letter re hearing issues; draft response	1.00	KE
Dec 4, 2024	Draft response to Enbridge procedural requests	1.50	KE
Dec 6, 2024	Review Procedural Order #9; various correspondence	0.40	KE
Dec 9, 2024	Prepare for hearing	3.50	KE
Dec 10, 2024	Prepare for hearing	1.50	KE
Dec 11, 2024	Prepare for hearing	1.50	KE
Dec 13, 2024	Prepare for hearing; correspondence re hearing; hearing preparation meeting with EFG (1.5 hrs); hearing preparation meeting with CEG (1.5 hrs);	5.50	KE
Dec 14, 2024	Prepare for hearing	3.00	KE
Dec 16, 2024	Prepare for hearing	0.30	KE
	Prepare for hearing	6.00	KE
Dec 17, 2024	Prepare for hearing (2 hr); attend hearing (7 hr); prepare for hearing (1 hr)	10.00	KE
Dec 18, 2024	Prepare for hearing (1.5 hrs); attend hearing (5.5); prepare for tomorrow's hearing (1.5)	8.50	KE
Dec 19, 2024	Prepare for hearing (.4); attend hearing (6.5)	6.90	KE
Dec 20, 2024	Prepare submissions on the expert issue	2.00	KE
Dec 30, 2024	Correspondence re hearing follow-up	0.30	KE
Jan 2, 2025	Correspondence re undertaking response	0.20	KE

Jan 7, 2025	Various hearing follow-up	1.50	KE
Jan 8, 2025	Hearing follow-up; confer with C. Neme, D. Hill and A. Montgomery	0.60	KE
Jan 10, 2025	Hearing follow up	0.20	KE
Jan 11, 2025	Correspondence re PO 10 and the submission deadline	0.30	KE
Jan 14, 2025	Hearing follow-up	0.40	KE
Jan 17, 2025	Hearing follow-up	0.50	KE
Jan 23, 2025	Draft submissions	3.00	KE
Jan 24, 2025	Draft submissions	7.00	KE
Jan 25, 2025	Draft submissions	2.50	KE
Jan 26, 2025	Draft submissions	4.00	KE
Jan 27, 2025	Draft submissions	9.00	KE
	Draft submissions	1.00	KS
Feb 12, 2025	Prepare submissions re RNG	6.00	KE
Feb 13, 2025	Draft submissions; various correspondence	4.10	KE
Feb 18, 2025	Review and revise RNG submissions	0.40	KE
Feb 20, 2025	Review submissions	1.20	KE
Feb 24, 2025	Various correspondence	0.10	KE
Feb 27, 2025	Review submissions of other parties and prepare reply submissions	2.00	KE
Mar 3, 2025	Prepare submissions	0.20	KE
Mar 4, 2025	Draft reply	0.50	KE
Mar 5, 2025	Draft reply	5.00	KE

Mar 6, 2025	Draft reply submissions	10.00	KE
Mar 17, 2025	Review reply submissions	0.20	KE
	Total Hours and Fees	271.60	\$82,244.80
	Total HST on Fees		\$10,691.82
<b>TOTALS</b>			
	Total Fees & Disbursements		\$82,244.80
	Total HST		\$10,691.82
	Total Fees, Disbursements, & HST		\$92,936.62
	<b>Amount Now Due</b>		<b>\$92,936.62</b>
HST #	75532 3078 RT0001		
Total HST	\$10,691.82		

**Matt & Brad McDonnell & Cebulko**

<b>CASE</b> EB-2024-0111: Rates: Distribution: Enbridge Gas Inc.	<b>COST CLAIM</b> EB-2024-0111 : 1 : Kent Elson	<b>INTERVENOR NAME</b> Elson, Kent; +1 (416) 906-7305 kent@elsonadvocacy.ca	<b>PARTICIPANT CLAIM STATUS</b> Submitted
<b>FILING PARTICIPANT</b>	<b>NEW PARTICIPANT</b> Yes	<b>NON-FILING PARTICIPANT F. NAME</b> Matt & Brad	<b>NON-FILING PARTICIPANT L. NAME</b> McDonnell & Cebulko
<b>SERVICE PROVIDER TYPE*</b> Consultant	<b>YEAR CALLED TO BAR*</b>	<b>COMPLETED YEARS PRACTICING/YEARS OF RELEVANT EXPERIENCE*</b> 12	<b>HOURLY RATE</b> 303
<b>HST RATE CHARGED*</b> 0.00	<b>CV STATUS (FOR CONSULTANT/ANALYST)</b> CV Attached	<b>LAST CV DATE</b> June 13, 2025	<b>OVERRIDE HOURLY RATE</b> No
<b>HST NUMBER</b> 872151923RT0001	<b>HEARINGS</b> Yes	<b>CONSULTATIONS</b> No	<b>DISBURSEMENTS</b> No

**HEARINGS**

<b>Hearings Hours</b> 194.00	<b>Hearings Subtotal (\$)</b> 58,782.00	<b>Hearings Total Tax (\$)</b> 0.00	<b>Hearings Total (\$)</b> 58,782.00			
<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Sub Total</u></b>	<b><u>HST Rate</u></b>	<b><u>HST</u></b>	<b><u>Total</u></b>
<b>DISCOVERY</b>						
Read and Research Application and Evidence		303		0.00		
Preparation of Interrogatories		303		0.00		
Review Interrogatory Responses		303		0.00		
Technical Conference Preparation		303		0.00		
Technical Conference Attendance		303		0.00		
Technical Conference Follow-up		303		0.00		
<b>Subtotal of DISCOVERY</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>PROCEDURAL</b>						
Preparation of Issues List Submission		303		0.00		
Attendance at Issues List Conference		303		0.00		
Preparation for a Confidentiality Request		303		0.00		
Prepare Submissions on Confidentiality		303		0.00		
Preparation of Motion(s) Materials		303		0.00		
Prepare Submissions on the Motion(s)		303		0.00		
Attendance at Hearing on Motion(s)		303		0.00		
Review Procedural Documents		303		0.00		

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Sub Total</u>	<u>HST Rate</u>	<u>HST</u>	<u>Total</u>
<b>Subtotal of PROCEDURAL</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>INTERVENOR EVIDENCE</b>						
Preparation of Intervenor Evidence	110.00	303	33,330.00	0.00		33,330.00
Interrogatory Responses	51.50	303	15,604.50	0.00		15,604.50
Preparation of Witness(es) for Attendance at Hearing		303		0.00		
<b>Subtotal of INTERVENOR EVIDENCE</b>	<b>161.50</b>	<b>303</b>	<b>48,934.50</b>	<b>0.00</b>	<b>0.00</b>	<b>48,934.50</b>
<b>SETTLEMENT CONFERENCE</b>						
Preparation for Settlement Conference		303		0.00		
Attendance at Settlement Conference		303		0.00		
Preparation of Settlement Proposal		303		0.00		
Attendance at Presentation to Panel		303		0.00		
<b>Subtotal of SETTLEMENT CONFERENCE</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>WRITTEN ARGUMENT</b>						
Written Submissions		303		0.00		
<b>Subtotal of WRITTEN ARGUMENT</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>ORAL ARGUMENT</b>						
Preparation for Oral Hearing	19.75	303	5,984.25	0.00		5,984.25
Attendance at Oral Hearing	12.75	303	3,863.25	0.00		3,863.25
Oral Submissions		303		0.00		
Attendance at Oral Submissions		303		0.00		
<b>Subtotal of ORAL ARGUMENT</b>	<b>32.50</b>	<b>303</b>	<b>9,847.50</b>	<b>0.00</b>	<b>0.00</b>	<b>9,847.50</b>
<b>DECISION</b>						
Review Decision		303		0.00		
Review Rate/Accounting Order		303		0.00		
Prepare Submission on Rate Order		303		0.00		
<b>Subtotal of DECISION</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>OTHER</b>						
Other Attendance (e.g., Intervenor Conferences)		303		0.00		
<b>Subtotal of OTHER</b>	<b>0.00</b>	<b>303</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>TOTAL SERVICE PROVIDER FEES</b>						
<b>Total Service Provider Fees</b>	<b>194.00</b>		<b>58,782.00</b>		<b>0.00</b>	<b>58,782.00</b>

## Attachments

<u>Attachment</u>	<u>Document Type</u>	<u>Import Message</u>
CEG_InvoiceDockets_20250331.pdf	Time Docket and Invoice	
CEG_CVs.pdf	CV	

**Hearings, Consultations, Disbursements Attachments**

<u>Attachment</u>	<u>Document Type</u>	<u>Claim Type</u>	<u>Import Message</u>
CEG_InvoiceDockets_20250331.pdf	Time Docket and Invoice	Hearings	
CEG_CVs.pdf	CV	Hearings	



INVOICE

Current Energy Group LLC  
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PMB 780  
Tucson, AZ 857165344

slake@currentenergy.group  
+1 (313) 657-8982



Environmental Defence:Enbridge Gas 2024 Rebasing Application, Phase 2

Bill to  
Environmental Defence

Invoice details

Invoice no.: 25-1236  
Terms: custom - 91 days  
Invoice date: 03/31/2025  
Due date: 06/30/2025

Description	Qty	Rate	Amount
Enbridge Gas 2024 Rebasing Application, Phase 2: Attendance at Oral Hearing (01/01/2024 - 12/31/2024)	12.75	\$303.00	\$3,863.25
Enbridge Gas 2024 Rebasing Application, Phase 2: Interrogatory Responses (01/01/2024 - 12/31/2024)	51.5	\$303.00	\$15,604.50
Enbridge Gas 2024 Rebasing Application, Phase 2: Preparation for Oral Hearing (01/01/2024 - 12/31/2024)	19.75	\$303.00	\$5,984.25
Enbridge Gas 2024 Rebasing Application, Phase 2: Preparation of Intervenor Evidence (01/01/2024 - 12/31/2024)	110	\$303.00	\$33,330.00

Total \$58,782.00

Ways to pay

BANK

Tax ID: 99-3019650

Note to customer

Thank you for your business and continued support! Please don't hesitate to reach out if you have any questions.

View and pay

# Matthew McDonnell

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*Managing Partner* \* (313) 657-8982 \* [mmcdonnell@currentenergy.group](mailto: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 2<sup>nd</sup> 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

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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](#)