

## **William Perea Marcus**

Principal Economist  
JBS Energy, Inc.

William Perea Marcus has 38 years of experience in analyzing electric and gas utilities.

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

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

Mr. Marcus is the author of the economic analysis contained in the 2030 Low Carbon Grid Study and a related analysis of the economics of replacing the Diablo Canyon nuclear plant with carbon-free alternatives. He is the co-author of a book on electric restructuring prepared for the National Association of Regulatory Utility Commissioners. He wrote a major report on Performance Based Ratemaking for the Energy Foundation.

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

From 1975-1978, Mr. Marcus was a case writer for the Kennedy School of Government, Harvard University, where he wrote case studies on energy, environmental, and urban policy and taught benefit-cost analysis.

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

From April, 1982, through June, 1984, he was principal economist at California Hydro Systems, Inc., an alternative energy consulting and development company. He prepared financial analyses of projects, negotiated utility contracts, and provided consulting services on utility economics.

## PUBLICATIONS

W. Marcus, "Low Carbon Grid Study: Comparison of 2030 Costs of Renewables, Efficiency, and Integration with Production Cost Savings," December, 2015.

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

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

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

## **OTHER REPORTS AND PRESENTATIONS**

- J. Caldwell, W. Marcus, V. J. White, and E. Anthony. **A Cost-Effective and Reliable Zero Carbon Replacement Strategy for Diablo Canyon Power Plant.** Prepared for Friends of the Earth. June, 2016.
- W. Marcus, **Electric Customer Charges – Arguments, Issues, and Alliances,** Presentation to National Association of State Utility Consumer Advocates, June 2014.
- W. Marcus. **Distribution Planning as part of a Renewed Regulatory Framework for Electricity.** April 20, 2012. Formal Comment Filed in Ontario Energy Board Dockets EB 2010-0377 et al. for Northwatch.
- G. Schilberg, W. Marcus, M. Hawiger and H. Goodson, **Policy Issues Related to Time Variant Pricing and Residential Rate Design,** March 30, 2012. Formal Comment filed in CPUC Apps. 10-02-028 and 10-08-005 for The Utility Reform Network (TURN).
- W. Marcus, **Gas Rate Design and Energy Efficiency,** Presentation to National Association of State Utility Consumer Advocates, June 2010.
- W. Marcus, **Residential Electric Rate Design and Energy Efficiency,** Presentation to National Regulatory Research Institute Rate Design Teleseminar, February 11, 2010.
- W. Marcus. **Review of the Business Plan for the Marin County Community Choice Aggregation Program.** February 2008 and **Review of PG&E’s March 5 2008 Comments on the Business Plan for the Marin County Community Choice Aggregation Program.** April 2008. Reports prepared for The County of Marin.
- W. Marcus and G. Ruzsovan, **Know Your Customers: A Review of Load Research Data and Economic, Demographic, and Appliance Saturation Characteristics of California Utility Residential Customers.** Attachment to Formal Comment Filed in CPUC App. 06-03-005 Dynamic Pricing Phase for TURN. December 2007.
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- W. Marcus and G. Ruzsovan. **Mid-Atlantic States Cost Curve Analysis.** For the National Association of Energy Service Companies and the Pace Law School Energy Project. November 2000.
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- W. Marcus and G. Schilberg, **Restructuring and Stranded Costs: Theory, Practice, and Implications.** Formal comments prepared for the Attorney General of Arkansas. September 2000.
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W. Marcus et al. **Photovoltaic Regulatory and Policy Issues**. for the Photovoltaic Education Program of the National Association of State Utility Consumer Advocates. June 1996 (first phase June 1995).

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CPUC Application 15-09-001. Revenue Requirement Issues for Pacific Gas and Electric Company (PG&E). For The Utility Reform Network (TURN). April 2016.

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PUCT Docket No. 44941. Cost Allocation and Treatment of Customers with Distributed Generation in Rate Design for El Paso Electric Company (EPE). December 2015. For Texas OPUC. (case settled)

Arkansas PSC Docket 15-078-U. Acquisition of Source Gas Arkansas (SGA) by Black Hills Utility Holdings. October 2015. For the Arkansas AG. (case settled)

Public Utilities Commission of Nevada (PUCN). Applications 15-07041 and 15-07042. Response to Senate Bill 374 on Net Metering Rate Design and Tariffs. For the Nevada Attorney General's Bureau of Consumer Protection (BCP). October 2015.

Arkansas PSC Docket 15-015-U. Revenue Requirement Issues, Distribution Cost Allocation, and Residential Rate Design for Entergy Arkansas, Inc. (EAI). August 2015. For the Arkansas AG. (case settled)

Colorado PUC. Docket No. 15AL-0299G. Selected Revenue Requirement Issues and Rate Design for Safety Rate Rider for Atmos Gas. August 2015. For Energy Outreach Colorado. (case settled)

Arkansas PSC Docket 15-011-U. Rate of Return, Revenue Requirements, Cost Allocation, and Rate Design for SGA. August 2015. For the Arkansas AG.

Arkansas PSC Docket 15-034-U. Oklahoma Gas and Electric Company (OG&E) Request for Rate Rider Under Act 310. July 2015. For the Arkansas AG. (case settled)

PUCT Docket No. 44698. Rate Class Definition and Billing Determinants for Energy Efficiency Rider for Southwestern Public Service Company (SPS). July 2015. For Texas OPUC.

Colorado PUC. Docket No. 15AL-0151G. Residential Gas Rate Design for Public Service Company of Colorado. June 2014. For Energy Outreach Colorado.

CPUC Applications 14-11-003/14-11-004. Revenue Requirement Issues for SoCal Gas and SDG&E. May 2015. For TURN.

PUCT Docket No. 43695. Class Cost Allocation and Small Commercial Rate Design Issues for SPS. May 2015. For Texas OPUC.

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Arkansas PSC Docket 13-028-U. Parameters for Collection of EAI's 2014 Rough Production Cost Equalization Payment Based on 2005 Costs. August 2014. For the Arkansas AG. (hearing waived)

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Arkansas PSC Docket 13-111-U. Rate of Return, Revenue Requirements, Cost Allocation, and Rate Design for Empire District Electric (Empire). April 2014. For the Arkansas AG. (case settled)

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Arkansas PSC Docket 13-079-U. Rate of Return, Revenue Requirements, Cost Allocation, and Rate Design for SGA. February 2014. For the Arkansas AG. (case settled)

PUCT. Docket 41791. Cost Allocation and Rate Design for Entergy Texas Inc. (ETI). January 2014. For Texas OPUC. (case settled)

CPUC Application 13-04-012. Marginal Cost and Revenue Allocation for PG&E. December 2013. For TURN. (case settled)

Colorado PUC Docket No. 13AL-0496G. Revenue Requirement Issues, Cost Allocation, and Residential Rate Design for Atmos Gas. For Energy Outreach Colorado. November, 2013. (case settled)

PUCN Docket Nos. 13-06002 and 13-06003. Marginal Cost and Residential Rate Design for Sierra Pacific Power Company (Sierra). For Nevada BCP. October, 2013.

CPUC Investigation 12-10-013. Ratemaking for Non-Operational San Onofre Nuclear Power Plant. September 2013. For TURN. (case settled)

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Arkansas PSC Docket 13-028-U. Rate of Return, Revenue Requirements, Cost Allocation, and Rate Design for EAI. August 2013. For the Arkansas AG.

North Carolina Utilities Commission (NCUC). Docket No. E-7, Sub 1026. Revenue Requirement and Class Cost Allocation for Duke Energy Carolinas. June 2013. For North Carolina Waste Awareness and Reduction Network (NC WARN).

CPUC Application 12-11-009. Revenue Requirement Issues for PG&E. May 2013. For TURN.

PUCT. Docket 41223. Acquisition of ETI's Transmission System by ITC Holdings. April 2013. For Texas OPUC.

Arkansas PSC Docket 12-069-U. Acquisition of EAI's Transmission System by ITC Holdings. April 2013. For the Arkansas AG. (case dismissed before hearing)

Arkansas PSC Docket No. 11-050-U. American Electric Power (AEP) Proposal to Establish Southwest Transmission Company (SW Transco) and Asset Transfer from Southwestern Electric Power Company (SWEPCO). Supplemental Testimony. March 2013. For the Arkansas AG.

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PUCT Docket 40627. Appeal of Austin Energy's Rates for Customers Outside the City of Austin: Cost Allocation and Residential Rate Design. February 2013. For Texas OPUC. (case settled)

Arkansas PSC Docket 12-056-U. EAI's Proposed Act 310 Rate Surcharge for Cost of Government Mandates. December 2012. For the Arkansas AG.

Arkansas PSC Docket 12-038-U. Ratemaking for EAI Proposal to Reassign Baseload Generation from Wholesale to Retail Use. September 2012. For the Arkansas AG.

CPUC App. 11-11-002 (Rate Design Phase). Cost Allocation for Sempra Gas Utilities' Base Margin and Pipeline Safety Enhancement Program. November 2012. For TURN. (case partially settled)

CPUC App. 12-02-020 Residential Rate Design for PG&E. August, 2012. For TURN.

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APSC Docket 12-012-U. Arkansas Electric Cooperative Corporation (AECC) Plan to Purchase a Combined Cycle Powerplant. July 2012. For the Arkansas AG. (case settled)

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Colorado PUC. Docket No. 11AL-151G. Cost Allocation and Rate Design for PSCo's Gas Operations. October 2011. For Energy Outreach Colorado. (case settled)

CPUC Applications 10-12-005 and 10-12-006. Policy and Revenue Requirements Issues in SoCal Gas's and SDG&E's 2012 Test Year General Rate Cases. September 2011. For TURN for SoCal and UCAN for SDG&E.

Arkansas PSC Docket No. 10-011-U. Regulatory Asset Ratemaking Related to EAI's Proposal to Leave the Entergy System Agreement and Join the Midwest ISO. July 2011. For the Arkansas AG.

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CPUC Application 10-11-015. Policy and Revenue Requirements Issues in SCE's 2011 Test Year General Rate Case. June 2011. For TURN.

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Alberta Utilities Commission (AUC) Application 1606549. Business Risk of Gas and Electric Utilities; Management Fees for Contributions in Aid of Construction. March 2011. For the Alberta Utilities Consumer Advocate (UCA).

Arkansas PSC Docket 10-067-U. Revenue Requirement, Cost of Service and Residential Rate Design for Oklahoma Gas and Electric Company (OG&E). March 2011. For the Arkansas AG (case settled).

PUCN. Dockets 10-10024 and 10-10025. Estimating Lost Revenue from Energy Efficiency for Sierra and Nevada Power Company (NPC). March 2011. For Nevada BCP.

CPUC App. 10-07-009. Policy Issues Related to Critical Peak Pricing for SDG&E. February 2011. For UCAN. (case settled)

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PUCT Docket 38480. Revenue Requirement, Cost of Service, and Residential Rate Design for Texas New Mexico Power Company (TNMP). November 2010. For Texas OPUC. (case settled)

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PUCN Docket 10-06001 et al. Marginal Cost, Revenue Allocation, and Residential Rate Design for Sierra. October 2010. For Nevada BCP.



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Iowa Utilities Board. Docket No. RPU-2010-0001. Weather Normalization, Cost of Service and Residential Rate Design for Interstate Power Limited. July 2010. For the Iowa OCA.

PUCT Docket 37744. Executive Compensation and other Revenue Requirement issues for ETI. June 2010. For Texas OPUC. (case settled)

AUC Application No. 1605758. Return Margin for Epcor Energy Alberta, Inc. (EEAI) Electric Regulated Rate Tariff (RRT). June 2010. For Alberta UCA. (case settled)

CPUC Application 09-12-020. Policy and Revenue Requirements Issues in PG&E's 2011 Test Year General Rate Case. May 2010. For TURN. (case settled after hearing)

CPUC App. 09-12-002. Choice of Investment Tax Credit versus Production Tax Credit for PG&E's Proposal to Acquire the Manzana Wind Project. April 2010. For TURN.

Arkansas PSC Docket 10-008-U. Securitization of Ice Storm Costs for EAI. March 2010. For the Arkansas AG.

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Arkansas PSC Docket 09-084-U. Formula Rate Plan, Revenue Requirement, Cost of Service, and Residential Rate Design for EAI. February 2010. For the Arkansas AG. (case settled)

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CPUC Application 08-05-023. PG&E's Distribution Reliability Improvement Program. July 2009. For TURN.

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PUCT. Docket 36025. Revenue Requirement and Hurricane Ike Cost Recovery for TNMP. For Texas OPUC. April 2009 (case settled).

PUCN. Docket 07-12005. Executive Compensation Request of Nevada Power Company (NPC). April 2009. For Nevada BCP.

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

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

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

Arkansas PSC Docket 08-139-U Phase IIB. Extraordinary Storm Damage Recovery Request of EAI. November 2008. For the Arkansas AG.

PUCT Docket 35717. Cost Allocation and Rate Design for Oncor Delivery Services. October 2008. For Texas OPUC.

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

PUCT Docket 35763. Revenue Requirements, Cost of Service, and Rate Design of Southwestern Public Service Company (SPS). For Texas OPUC. October 2008. (case settled)

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

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

AUC Application No. 1512069. Evaluation of Ten-Year Formula Based Rate Program of Enmax Power Corporation. July 2008. For the CCA and PICA.

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

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

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

Arkansas PSC Docket 06-152-U Phase IIB. Capacity Acquisition Rider for the Ouachita Plant of EAI. October 2007. For the Arkansas AG.

CPUC App. 07-07-026. Policy Analysis and Cost-Effectiveness Evaluation of SCE's Advanced Metering Infrastructure Program. January 2008. For TURN.

PUCN Docket 07-09016. Allocation of Gas Pipeline Charges between Sierra's Gas and Electric Departments. December 2007. For Nevada BCP.

Alberta Energy and Utilities Board (Alberta EUB). Application 1512342. Return Margin for Regulated Retail Electric Service provided by Epcor Energy Services. November 2007. For the Alberta UCA.

Washington Utilities and Transportation Commission. Docket Nos. UE-070804/UG-070805. Rate of Return and Revenue Requirement Issues for Avista Energy. October 2007. For Washington Public Counsel. (case settled)

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

Arkansas PSC Docket 06-152-U Phase IIA. EAI's Proposed Capacity Acquisition Rider. October 2007. For the Arkansas AG.

Arkansas PSC Docket 07-026-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Arkansas Oklahoma Gas Corporation (AOG). September 2007. For the Arkansas AG. (case settled)

CPUC App. 07-01-041. Marginal Cost and Revenue Allocation for SDG&E. August 2007. For UCAN. (case settled)

CPUC App. 07-05-003 et al. Pension and Decommissioning Fund Returns as Related to Cost of Capital of California Energy Utilities. August 2007. For Aglet Consumer Alliance (Aglet), TURN, and UCAN.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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