

**William Perea Marcus**

Principal Economist

MCPM Economics

William Perea Marcus has over 40 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 January, 2017, Mr. Marcus became Principal Economist for MCPM Economics. MCPM is a successor company to JBS Energy, Inc., where Mr. Marcus served as Principal Economist for 32 years, starting in July, 1984, and supervised the firm's extensive consulting practice.

Mr. Marcus is a co-author of *Electric Cost Allocation for a New Era: A Manual* recently released by the Regulatory Assistance Project. He is also 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, Québec, South Carolina, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, and Yukon. He testified on issues including utility revenue requirements for forecast and historical test years, and electric and gas cost of service and rate design, 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, and mergers.

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

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- W. Marcus. "Estimating Utilities' Prices for Power Purchases from Alternative Energy Resources." CEC Staff Report P500-80-015. March 1980.
- 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).
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## **TESTIMONY AND FORMAL COMMENTS**

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CPUC Application 18-12-009 et al. Electric Generation and Cash Working Capital for PG&E. July 2019. For TURN. (case settled after hearing)

PUCT Docket No. 49494. Vegetation Management, Smart Meter Depreciation, and Class Cost of Service Study for AEP Texas. July 2019. For Texas OPUC. (case settled after hearing)

Arkansas PSC Docket No. 19-008-U. Vegetation Management, Incentive Compensation, and other Revenue Requirement Issues for Southwestern Electric Power Company (SWEPCO). July 2019. For the Arkansas AG.(case settled)

Colorado PUC. Docket No. 19AL-0075-G. Cost Allocation and Residential Rate Design for Black Hills Gas, June 2019. For EOC. (cost allocation and rate design issues raised by EOC settled except for regional consolidation)

PUCT Docket No. 48973. Cross-Rebuttal on Imputed Capacity in Fuel Reconciliation for SPS June 2019. For Texas OPUC. (issue deferred to later case)

CPUC Application 17-12-011 et al. Customer Cost Quantification for the Three Major Electric Utilities. May 2019. For TURN.

PUCT Docket No. 48973. Treatment of Off-System Sales in SPS Fuel Reconciliation. May 2019. For Texas OPUC.

CPUC App. 18-07-024. Class Cost of Service and Residential Rate Design for Southern California Gas Company (SoCalGas) and San Diego Gas and Electric (SDG&E) gas operations. April 2019. For TURN.

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PUCT Docket No. 48233. Cost Allocation for SWEPCO's Rate Reduction from Tax Law Changes. July 2018. For Texas OPUC. (case settled)

CPUC App. 17-09-063. Gas Cost of Service and Residential Rate Design for PG&E. June 2018. For TURN.

Arkansas PSC Docket No. 17-071-U. Revenue Requirement Issues for Black Hills Energy Arkansas. May 2018. For the Arkansas AG. (case settled)

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Colorado PUC. Docket No. 17AL-0477E. Cost Allocation, Rate Design, and Construction Allowances for Black Hills Colorado Electric Company. October 2017. For EOC.

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CPUC App. 17-01-020. SDG&E's Rate Design for Electric Vehicle Owners and Other Large Residential Customers. August 2017. For TURN.

PUCT Docket No. 46831. Cost Allocation and Treatment of Customers with Distributed Generation in Rate Design for El Paso Electric Company (EPE). June 2017. For Texas OPUC. (case settled)

PUCT Docket No. 46368. Regulatory Issues Related to Installation of Batteries by AEP Texas North. May 2017. For Texas OPUC.

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PUCT Docket No. 46449. Revenue Requirement and Solar Energy Compensation for SWEPCO. April 2017. For Texas OPUC.

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CPUC App.16-06-013. Marginal Cost, Revenue Allocation, and Residential Rate Design for PG&E. For TURN. March 2017. (case settled on issues on which I testified)

CPUC App.16-08-006. Cost of Continued Operation of PG&E's Diablo Canyon Nuclear Powerplant if not Closed and Recovery of Relicensing Costs. For TURN. January 2017.

Arkansas PSC Docket No. 16-052-U. Rate of Return, Revenue Requirements, and Analysis of Residential Demand Charges for Oklahoma Gas and Electric Company (OG&E). January 2017. For the Arkansas AG. (case settled)

Arkansas PSC Docket No. 16-081-U. Conditions Regarding the Merger of Summit Utilities with Arkansas Oklahoma Gas Company (AOG). January 2017. For the Arkansas AG. (case settled)

Colorado PUC. Docket No. 16AL-0326E. Equity Based Compensation and Rate Design for New Generating Plant Addition for Black Hills. August 2016. For EOC.

PUCT Docket No. 45524. Revenue Requirement, Cost Allocation, and Rate Design Issues for SPS. August 2016. For Texas OPUC. (case settled)

PUCT Project No. 46046. Straight Fixed-Variable Rate Design and Other Alternative Ratemaking Mechanisms. August 2016. For Texas OPUC. (formal written comment for public hearing)

CPUC App. 15-04-012. Marginal Cost, Revenue Allocation, and Policy Regarding Residential Demand Charges for SDG&E (joint testimony with Garrick Jones). For UCAN. July 2016. (contested settlement)

CPUC App. 15-09-001. Revenue Requirement Issues for PG&E. For TURN. April 2016. (case settled)

Arkansas PSC Docket 15-015-U. Rate of Return and Revenue Requirement Issues for Centerpoint Energy Arkansas (CEA). April 2016. For the Arkansas AG.

CPUC App. 15-07-014. Cost Allocation and Residential Rate Design for SoCal Gas and SDG&E's Gas Operations. March 2016. For TURN. (case partially settled)

PUCT Docket No. 44941. Cost Allocation and Treatment of Customers with Distributed Generation in Rate Design for 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)

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Colorado PUC. Docket No. 15AL-0299G. Selected Revenue Requirement Issues and Rate Design for Safety Rate Rider for Atmos Gas. August 2015. For EOC. (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. 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 SPS. July 2015. For Texas OPUC.

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PUCT Docket No. 42370. Allocation of Rate Case Expenses of Cities with Original Jurisdiction. January 2015. For Texas OPUC.

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Wisconsin PSC Docket 3270-UR-120. Electric Cost Allocation and Residential Rate Design for Madison Gas and Electric Company. September 2014. For the City of Madison.

CPUC Application 13-11-003. Revenue Requirements Issues for SCE. August 2014. For TURN.

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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)

Ontario Energy Board (OEB) Docket EB-2013-0496. Residential Rate Design for Hydro One Networks, Inc. July 2014. For the Green Energy Coalition.

Colorado PUC. Docket No. 14AL-0300G. Revenue Requirement Issues, Cost Allocation and Residential Rate Design for Atmos Gas. July 2014. For EOC. (case settled)

OEB Docket EB-2012-0410. Rate Design for Electricity Distributors. June 2014. For the Green Energy Coalition. (expert report attached as formal comment)

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

Arkansas PSC Docket 13-028-U. Rehearing Regarding Return on Equity of EAI. April 2014. For the Arkansas AG. (paper hearing)

CPUC Rulemaking 12-06-013. Residential Rate Design Phase 1 (Summer 2014) for SDG&E. March 2014. For TURN. (case settled)

Arkansas PSC Docket 13-078-U. Cost Allocation and Rate Design for AOG. March 2014. For the Arkansas AG. (case settled)

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 EOC. 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.

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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.



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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)

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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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CPUC App. 11-10-002. Marginal Cost, Revenue Allocation and Rate Design for SDG&E. June 2012. For San Diego Consumers Action Network (SDCAN). (case settled)

PUCN Docket No. 09-06029. Economic and Demographic Factors Relating to Residential Electric Use in Northern and Southern Nevada. For Nevada BCP. May 2012. (formal comment)

Arkansas PSC Docket 07-085-TF et al. Avoided Cost and Other Issues Related to Energy Efficiency. May 2012. For the Arkansas AG.

Arkansas PSC Docket No. 10-011-U. Increased Costs Resulting from the combination of the ITC Acquisition of Entergy's Transmission and EAI Proposal to Leave the Entergy System Agreement and Join the Midcontinent ISO. April 2012. For the Arkansas AG.

CPUC App. 11-06-007. Revenue Allocation and Rate Design for SCE. February 2012. For TURN. (case settled)

CPUC Rulemaking 11-02-019. Ratemaking Issues Relating to PG&E's Pipeline Safety Enhancement Plan. January, 2012. For TURN.

Arkansas PSC Docket No. 11-050-U. AEP Proposal to Establish SW Transco and Asset Transfer from SWEPCO. November 2011. For the Arkansas AG.

Arkansas PSC Docket No. 11-069-U. EAI Proposal to Acquire Hot Spring Combined Cycle Powerplant. October 2011. For the Arkansas AG. (case settled)

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

CPUC App. 11-03-002. Policy Issues Related to Demand Response Program Design and Implementation Pricing for SDG&E. June 2011. For UCAN. (case settled)

Arkansas PSC Docket 07-085-TF et al. Need to Include Provisions Related to Avoided Cost Data in Arkansas' Utilities Energy Efficiency Tariffs. June 2011. For the Arkansas AG (written proceeding, no hearing).

CPUC Application 10-11-015. Policy and Revenue Requirements Issues in SCE's 2012 Test Year General Rate Case. June 2011. For TURN.

CPUC Application 10-11-009. Revenue Requirement for SCE's Catalina Island Water Utility. May 2011. For TURN.

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 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)

PUCN Dockets 10-08014 and 10-08015. Time of Use and Critical Peak Pricing Rates for Sierra and NPC. January 2011. For Nevada BCP.

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

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)

Colorado PUC. Docket No. 10AL-455G. Capital Structure and Rate of Return for Source Gas Distribution. October 2010. For AM Gas Transport Corp. and Barton Levin. (case settled)

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

CPUC Application 10-03-014. Marginal Cost, Revenue Allocation, and Residential Rate Design for PG&E. October 2010. For TURN. (case settled, except residential rate design)

AUC Application No. 1606230. Cost of Service and Rate Design for AltaGas Ltd. September 2010. For the Alberta UCA. (joint testimony with R. Bruggeman; case settled).

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.

Nebraska PSC Docket No. NG-0061. Weather Normalization, Cost of Service, and Residential Rate Design of Black Hills/Nebraska Gas Utility Company. March 2010. For the Nebraska Public Advocate.

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)

AUC Application No. 1605580. Irrigation Rate Design for Fortis Alberta, Inc. January 2010. For Alberta UCA.

Arkansas PSC Dockets 07-077-TF, 07-078-TF, 07-081-TF, and 07-085-TF (Energy Efficiency). Energy Efficiency Incentives; Total Energy Efficiency from Using Gas Instead of Electricity; Efficiency as a Substitute for Smart Meters. September-October 2009. For the Arkansas AG.

CPUC App. 09-04-004 et al. Economic Assumptions for Nuclear Decommissioning Costs. August 2009. For TURN. (case settled after appearance).

AUC Application 1587092. Cost Allocation and Rate Design for Atco Gas Ltd.. July 2009. For the Alberta UCA. (joint with H. VanderVeen and R. Bruggeman; case settled)

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

Arkansas PSC Docket 09-008-U. Construction Work in Progress in the Rate Base, Revenue Requirement, Cost of Service, and Residential Rate Design for SWEPSCO. June 2009. For the Arkansas AG. (case settled)

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.

AUC Application 1587092. Management Fee for Contributions in Aid of Construction for AltaLink Management. March 2009. For the Consumers' Coalition of Alberta (CCA) and Public Institutional Consumers of Alberta (PICA).

AUC Application 1578571. Business Risk of Alberta Utilities. March 2009. For the Alberta UCA.

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 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 PSCo's Gas Operations. For EOC. 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 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 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 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.

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