

**STATE OF MARYLAND
PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF THE MERGER)
OF EXELON CORPORATION AND)
PEPCO HOLDINGS, INC.) **CASE NO. 9361**
)**

**DIRECT TESTIMONY OF PAUL R. PETERSON
ON BEHALF OF MARYLAND OFFICE OF PEOPLE'S COUNSEL**

December 8, 2014

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1 **I. STATEMENT OF QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Paul Peterson. I am a Principal with Synapse Energy Economics.
4 Inc. a consulting company with an address of 485 Massachusetts Avenue,
5 Cambridge, Massachusetts.

6 **Q. On whose behalf are you submitting testimony in this proceeding?**

7 A. I am submitting testimony on behalf of the Maryland Office of People's Counsel.

8 **Q. Please describe your education and professional background.**

9 A. I hold a Bachelor of Arts Degree in Political Science from Williams College and a
10 Juris Doctor Degree from Western New England University School of Law. I
11 began my career in the energy field with the University of Vermont Extension
12 Service in 1978 as an Energy Agent assisting residential and commercial
13 customers with energy audits and energy efficiency measures. In 1990 I began
14 work for the Vermont Public Service Board as a Hearing Officer and Utilities
15 Analyst. In 1998 I took a position with ISO New England as Manager of
16 Regulatory Affairs. In 2001 I began my current employment with Synapse
17 Energy Economics. For Synapse, I have focused on wholesale electricity markets
18 and regional planning issues, primarily in the Northeast, but more recently in
19 Texas and the West. A copy of my resume is attached hereto as Attachment PRP-
20 1.

21 **Q. Have you previously testified before utility regulatory agencies?**

22 A. Yes. I have previously testified before the Arizona Corporation Commission,
23 Connecticut Department of Public Utility Control, Public Utilities Commission of

1 Texas, Vermont Public Service Board, Maryland Public Service Commission, and
2 the Federal Energy Regulatory Commission, on a number of technical matters
3 relating to wholesale markets and system planning.

4 Most recently, I submitted testimony in this same merger case on November 18,
5 2014, on behalf of the Division of Rate Counsel in BPU Docket No.
6 EM14060581.

7 **II. PURPOSE AND SUMMARY OF TESTIMONY**

8 **Q. What is the purpose of your testimony in this proceeding?**

9 The purpose of my testimony is to identify concerns regarding concentration of
10 ownership, market power, and market manipulation related to the proposed
11 Exelon-PHI merger that may impact customers of Potomac Electric Power
12 Company ("Pepco") and Delmarva Power ("Delmarva"). My testimony reviews
13 the proposed merger regarding the concentration of ownership of resources and
14 transmission facilities that the merger would create; and overall concerns about
15 the loss of competitiveness in an industry that, in general, needs more entities
16 competing in the markets and at all levels of the regional bulk power system.

17 **Q. What are your findings?**

18
19 A. My findings are summarized as:

- 20
21 1. The merger of Exelon-PHI would not significantly increase generation ownership
22 to cause horizontal market power concerns, and the increased transmission
23 ownership from the merger is off-set, to a certain extent, by existing FERC-
24 enforced Open Access requirements for wholesale transactions. However, the

1 larger footprint of the merged Exelon-PHI creates several other concerns. These
2 concerns include the role of the new merged company as a wholesale market
3 participant, in the interconnection study process for new generation, and in the
4 setting of transfer limits for elements of the transmission system.

5 2. On the resource side, there are concerns regarding potential market abuses arising
6 from the expanded participation of non-traditional resources such as demand
7 response (DR) and energy efficiency (EE) in wholesale capacity markets. The
8 merged Exelon-PHI will have generation and demand-side resources that can be
9 offered into the energy, reserve, and capacity markets. Decisions about the
10 quantities of DR and EE to offer into these markets can have significant impacts
11 on the clearing prices paid to all resources. The proposed merger would provide
12 the new Exelon-PHI company with greater quantities of these resources and
13 expanded opportunities to impact clearing prices in more zones.

14 3. On the transmission side, the expanded control of transmission facilities that the
15 merger would create raises concerns about both the interconnection studies for
16 new independent generation facilities and the published line ratings that govern
17 flows over the bulk power system. Transmission owners are the primary sources
18 of information for both of these functions; the ability to delay competitive
19 generation through complex interconnection studies or prevent higher flows over
20 the wires by posting low line ratings are detrimental to an efficient, lower cost
21 system.

1 4. The proposed merger would also create new issues about governance in the PJM
2 stakeholder process. These governance concerns include both the ability to
3 influence PJM's independence and the impact on the decision making process in
4 committees, subcommittees and issue focused task forces.

5 **Q. How does the proposed merger affect competition?**

6 A. The proposed merger will reduce the amount of competition in an industry that
7 needs to have more competitive entry at all levels. The new merged company will
8 increase Exelon's circuit miles of transmission owned by 65% (from Exelon's
9 current 7,177 circuit miles to a combined 11,819 circuit miles). Those combined
10 transmission assets received almost 25% of all transmission credits collected from
11 the PJM market according to the Independent Market Monitor. The proposed
12 merger would result in Exelon providing transmission and distribution services to
13 25% more customers (Exelon's current 6.6 million electric customers will
14 increase to a combined 8.4 million electric customers). The merger takes two
15 large companies that are both members in PJM and reduces them to one. In
16 weighing the benefits and detriments of this merger, the reduced competition
17 among providers of resources, the reduced competition among builders of
18 transmission facilities, and the reduced participation in the RTO governance
19 process are all detriments. The Commission must determine whether the benefits
20 of the merger outweigh the detriments; nonetheless the detriments are real and
21 need to be considered by the Commission when balancing the benefits and
22 detriments of this proposal.

1 **Q. What are your recommendations?**

2 To lessen, but not eliminate, the impacts of these potential detriments, the
3 Commission should only approve the merger if the following conditions are met:

4 1. The new Exelon-PHI will appoint an independent third party to review the
5 results of its interconnection study process.

6 2. The new Exelon-PHI will allow an independent third-party review of all of its
7 demand resource offers, including decisions to not offer resources, into the
8 PJM energy market and the annual Base Residual Auction for capacity
9 resources.

10 3. The new Exelon-PHI will fully comply with Order 1000 principles that will
11 encourage competition in the construction of transmission facilities, including
12 the elimination of right-of-first-refusal for incumbent transmission owners.

13 4. The new Exelon-PHI will remain in PJM for the next ten years and, after the
14 ten-year period, seek Commission approval of any decision to leave PJM.

15 5. The new Exelon-PHI explains how PHI affiliates in the PJM stakeholder
16 process will act independently to adopt positions and advance rule changes
17 that will benefit PHI customers, including Pepco and Delmarva customers.

18 6. The new Exelon-PHI explains how consolidating two votes to one vote in the
19 sector-weighted voting process in PJM will not negatively impact PHI
20 customers, including Pepco and Delmarva customers.

1 **III. SPECIFIC ISSUES**

2 **Q. Please describe your concerns regarding horizontal and vertical market**
3 **power issues presented by this proposed merger.**

4 A. Traditional merger concerns about the increased concentration of generation
5 ownership and the potential for the exercise of horizontal market power do not
6 apply in this situation due to the previous divestiture of PHI generation assets and
7 overall competition from other generation resources. However, the proposed
8 merger will provide Exelon with control over significant new demand resource
9 assets in the form of demand response (DR) and energy efficiency (EE) resources
10 resulting from PHI utility programs. These are new demand resources in addition
11 to demand resources currently under Exelon control. To the extent that these
12 resources are offered into the PJM energy market and the annual Base Residual
13 Auction to meet future capacity needs, they may displace generation resources,
14 including generation resources owned by the newly merged entity. Decisions
15 about the quantity of demand resources that will be entered into these markets and
16 the prices at which they are offered will create opportunities to exercise market
17 power. The new Exelon-PHI will be able to offer demand resources (or withhold
18 them) from the daily energy market and the annual capacity auction in a manner
19 that could affect prices in numerous PJM load zones as well as on a system-wide
20 basis.

21 **Q. Please describe your concerns regarding vertical market power issues**
22 **presented by this proposed merger.**

1 Traditional concerns related to vertical market power abuse are substantially
2 reduced due to Federal Energy Regulatory Commission (FERC) requirements for
3 non-discriminatory access to transmission and the PJM Open Access
4 Transmission Tariff (OATT). The newly merged company will not be able to
5 exclude other generation resources from using its transmission assets in a
6 competitive market framework to deliver power.

7 However, if the merger is approved, the new entity may be able to
8 exercise a form of vertical market power in its review of interconnection requests
9 from new generation facilities. The study process for new generation requests is a
10 joint effort of the local transmission provider and PJM staff. As the local
11 transmission provider, the new Exelon/PHI could either delay the study process or
12 exaggerate the interconnection costs, or both, in an effort to prevent new
13 generation resources from competing with its existing resources.

14 A related issue, raised by the Independent Market Monitor (“IMM”) is the
15 information that a merged Exelon/PHI entity would provide to PJM regarding line
16 ratings and the ability to transfer power from one load zone to another. The line
17 ratings become particularly important during stressed system conditions such as
18 summer peak load or winter polar vortex events. The concern raised by the IMM
19 is that a merged Exelon/PHI will have a greater ability to affect zonal prices and
20 favor its generation assets by strategically misinforming or conservatively
21 understating to PJM the actual line ratings.

22 These market power or market abuse concerns can be reduced through
23 specific mitigations in the form of an Order conditioning Commission approval of

1 the merger on Exelon/PHI allowing greater scrutiny of its demand resource offers
2 into the daily energy market and the annual capacity auction by the IMM,
3 allowing an independent third-party review of the interconnection study process,
4 and submitting more detailed analyses to PJM and the IMM of the line ratings for
5 its transmission system under a variety of stressed conditions.

6 **Q. What are your concerns about PJM governance issues related to the**
7 **proposed merger?**

8 A. I have three general concerns regarding the proposed merger and its impact on the
9 PJM governance process. The first concern is the direct result of the proposed
10 merger; the other two concerns are about making an existing situation worse.
11 My first governance concern is that the proposed merger will create a new entity
12 with a larger footprint within the PJM Interconnection in terms of customers
13 served, combined transmission assets, and resources under its control. This larger
14 entity exacerbates the current situation in PJM where there are several very large
15 entities and hundreds of smaller entities that participate in the PJM stakeholder
16 process to develop rules and procedures for the entire PJM Interconnection that
17 spans 13 states and the District of Columbia. The merger will provide Exelon with
18 an even stronger position from which it can influence PJM. Because participation
19 in PJM is voluntary, one way to leverage influence with PJM staff is to threaten to
20 withdraw if particular Exelon/PHI positions are not supported by PJM. To limit
21 this method of leveraging its influence, the Commission should require, as a
22 condition of merger approval, that the new Exelon/PHI will commit to remain in
23 PJM for an extended period of time and, after that time period, to submit to

1 approval by the Commission of any decision to withdraw from the PJM

2 Interconnection.

3 **Q. What is your second governance concern?**

4 A. My second governance concern has to do with the voting structure for PJM upper
5 level committees. The Members Committee and the Markets & Reliability
6 Committee (MRC) have sector-weighted voting. Prior to the merger, Exelon and
7 PHI each have one vote. After the merger, there will be a single Exelon-PHI vote.
8 It is not clear the criteria that the newly merged company will use to cast its single
9 vote: how will the interests of all of Exelon's customers be represented by just
10 one vote, particularly when some affiliates may benefit from a vote in favor of a
11 particular change while other affiliates may see higher costs? Also, how will the
12 newly merged company vote in situations when the interests of its generation
13 affiliates may conflict with the interests of the PHI load customers it serves? The
14 Commission should require Exelon to address these concerns as a condition of
15 approval of the proposed merger.

16 **Q. What is your third governance concern?**

17 A. My third governance concern has to do with the voting structure of the lower
18 committees, including working groups and task forces. The three standing
19 committees below the Members and MRC have simple majority voting with each
20 affiliate counting as a vote. All other sub-committees and task forces operate on a
21 consensus basis with no formal voting; however, each of these groups reports
22 back to one of the three standing committees. The use of a simple majority vote of
23 all members, with affiliates counted, creates concerns; the proposed merger of

1 Exelon and PHI will exacerbate those concerns. Simply stated, Exelon has 11
2 affiliate votes today; the merger will provide Exelon with four additional votes for
3 a total of 15. Attachment PRP 2 is a simplified version of the committee structure
4 in PJM that helps illustrate the various voting rules for each stakeholder
5 committee.

6 The standing committees typically delegate issues to a sub-group. In the
7 sub-groups, there are often straw polls to help narrow the issues under
8 consideration and try to achieve consensus. Sub-groups often report out a majority
9 view and minority views in their report to the standing committee. At the standing
10 committee, a simple majority vote for a proposal will end the voting process and
11 the issue then goes to the two senior committees for sector-weighted voting.

12 There are many instances when minority proposals are not even considered. The
13 governance issue in play here is that a few people (with many affiliates) at the
14 standing committee can dominate and control the issues. This is particularly a
15 problem for PJM members that may have special needs or unique perspectives on
16 issues. At the lower committees, the issues are framed through straw polls and
17 general consensus that may not provide for a minority view to even be passed up
18 to one of the standing committees. A minority view that makes it to the standing
19 committee now faces the same hurdle of simple majority voting; there are often a
20 few stakeholders casting ten or more votes based on their affiliates relationships.

21 The proposed merger will provide Exelon with even more votes than it has
22 today and eliminates the ability of PHI affiliates to vote their own interests. There
23 may be a market rule change that would be beneficial for many of Exelon's pre-

1 merger customers but not good for Pepco and Delmarva customers (and perhaps
2 customers of other PHI affiliates). How will the new Exelon/PHI vote at the
3 Market Implementation Committee? The same concern may apply to a
4 transmission project that may benefit one group of Exelon affiliates but impose
5 some of the costs on all PJM members. How will the new Exelon/PHI vote at the
6 Planning Committee? A proposed market rule change could benefit owners of
7 generation assets at the expense of demand resources, such as the demand
8 resource and energy efficiency programs run by the PHI utilities? How would
9 Exelon vote in the Members Committee? One possible solution would be to
10 require Exelon to split its votes, as a merger approval condition, at the lower and
11 standing committees to reflect the divergent interests of its affiliates. Even if
12 Exelon agreed to this solution, there would be questions about how it would be
13 enforced. At a minimum, the Commission should recognize this as one of the
14 negative aspects of the proposed merger and ask Exelon to explain how it
15 proposes to address this situation.

16 **Q. Have you identified any other areas where the proposed merger would have**
17 **an adverse impact on competition?**

18 A. Yes. Constellation, an Exelon company, is currently a wholesale SOS supplier in
19 Maryland. As noted in the testimony of Boston Pacific in PSC Case 9056 and
20 9064, there was only one bidder for many of the residential products in the most
21 recent SOS procurement that was held on October 20, 2014. While Boston
22 Pacific attributed uncertainty surrounding PJM's capacity market to the lack of

1 bidders, this merger eliminates a firm that could participate in the SOS auctions as
2 a potential supplier of power.

3 **Q. Does this conclude your testimony?**

4 A. Yes. However, I reserve the right to supplement my testimony subject to further
5 updates to discovery and information provided in this proceeding.

Attachment PRP- 1 Resume for Paul R. Peterson

Paul R. Peterson

Principal
Synapse Energy Economics
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EMPLOYMENT

Synapse Energy Economics Inc., Cambridge, MA.

Principal, March 2001 - present.

Provide consulting services on a variety of energy and electricity related studies. Represent New England consumer advocate and environmental concerns in NEPOOL and ISO New England working groups. Monitor reliability and markets issues in RTOs and ISOs. Champion better integration of demand resources in bulk power systems. Current focus on transmission planning and FERC Order 1000 issues. Participate in FERC proceedings on system planning and market design issues.

ISO New England Inc., Holyoke, MA.

Coordinator of Regulatory Affairs, 2000 – 2001.

Coordinate regulatory activities with individual state public utility commissions, the New England Conference of Public Utilities Commissioners (NECPUC), and the Federal Energy Regulatory Commission (FERC). Assist the General Counsel on a variety of specific tasks and documents; draft letters and reports for the Chief Executive Officer.

Public Information and Government Affairs, 1998 – 1999.

Worked with all ISO-NE constituencies including NEPOOL Participants, regulatory agencies, and stakeholder groups in large-group and small-group formats. Developed and presented materials that described ISO-NE's functions, special projects (including Year 2000 rollover issues), and future evolution.

Vermont Public Service Board, Montpelier, VT.

Policy Analyst, 1997 - 1998.

Monitored House and Senate legislation on electric restructuring; helped coordinate the passage of Senate Bill S.62 in 1997. Coordinated the New England Conference of Public Utilities Commissioners (NECPUC) activities regarding NEPOOL restructuring; assisted in drafting documents to create an Independent System Operator (ISO) for New England. Worked on New England task forces to develop a model rule for electric disclosure projects for consumer information and regulatory compliance.

Utilities Analyst, 1990 - 1997.

Reviewed regulated utility filings for changes in rates; judicial Hearing Officer for contested cases on a wide range of topics; wrote all decisions regarding annual utility applications for Weatherization Tax Credits. Focused on integrated resource planning and electric industry restructuring; initial Hearing Officer for the Energy Efficiency Utility docket. Chaired the Staff Energy Committee of NECPUC.

Energy Analysis, Burlington, VT. Consultant, 1990.
Energy-efficiency program design and evaluation.

UVM Extension Service, Burlington, VT.

Area Energy Agent, 1985 - 1990.

Performed tasks pursuant to an annual contract with Vermont Department of Public Service to conduct energy research, design energy efficiency programs and provide public education (see attached list of publications).

Home Energy Audit Team (H.E.A.T.), 1978 - 1985.

Home energy audits; energy surveys for commercial, municipal, and non-profit buildings; energy education and information.

The Close-Up Foundation, Washington, D.C. Program Administrator, 1975 - 1978.

Directed weekly government studies program for 200 high school students and teachers; supervised a staff of fifteen; coordinated curriculum and logistical aspects of program.

EDUCATION

Admitted to Vermont Bar, February 1992

Western New England College School Of Law, Springfield, MA.

Juris Doctor degree, cum laude, May 1990
American Jurisprudence Award: Remedies, 1989
Merit Scholarship recipient
Student Bar Association Representative

Williams College, Williamstown, MA

Bachelor of Arts degree, cum laude, June 1974
Political Science and Environmental Studies
Tyng Scholarship recipient

National Judicial College, Reno, NV

Administrative Hearings, Sept., 1994
Civil Mediation, March, 1996
Civil Mediation, July, 1997 (faculty assistant)

American Inns of Court, Northern Vermont Chapter

1995-1996, member
1996-1997, member

Continuing Legal Education, Vermont Bar Association
Americans with Disabilities Act, April 1992
Ethical Issues/Governmental Agencies, October 1992
Advance Medical Directives, May 1993
Family Law Workshop, September 1993
Negotiating Settlements, May 1994
Physician Assisted Suicide Symposium, October 1996
Electric Industry Restructuring, March 1999
Advance Medical Directives, May 1999
International Law Update, June 2000

UVM Continuing Education, Brattleboro, VT
Small Computer Course, Spring 1983
Communications Workshops, Spring 1983 & Spring 1984

RECENT PUBLICATIONS AND TESTIMONY

Balancing Market Opportunities in the West: How participation in an expanded balancing market could save customers hundreds of millions of dollars, prepared for the Western Grid Group, by Paul Peterson, Spencer Fields, and Melissa Whited, October 2014.

Synapse Comments on FAST Proposals in ERCOT, prepared for Sierra Club, Lone Star Chapter, by Paul Peterson, Melissa Whited, and Spencer Fields, May 28, 2014.

Demand Response as a Power System Resource, prepared for Regulatory Assistance Project, by Doug Hurley, Paul Peterson, and Melissa Whited, May 2013.

PJM System Planning: Enhancements for the 21st Century, prepared for Sierra Club, by Paul Peterson, Vladlena Sabodash, Matthew Wittenstein, and Doug Hurley, June 20, 2011.

Public Policy Impacts on Transmission Planning, prepared for Earthjustice, by Paul Peterson, Vladlena Sabodash, Rachel Wilson, and Doug Hurley, December 21, 2010.

Demand Response Potential in ISO New England's Day-Ahead Energy Market, prepared for Massachusetts Office of the Attorney General, by Paul Peterson, Doug Hurley, and Vladlena Sabodash, October 11, 2010.

Demand Side Resource Potential: A Review of Global Energy Partners' Report for Midwest ISO, prepared for Project for Sustainable FERC Energy Policy, by Paul Peterson, Vladlena Sabodash, and Kenji Takahashi, September 3, 2010.

Energy Market Savings from Price Responsive Demand Participation, prepared for NEPOOL Clients in Alternative Resources and End User Sectors, by Paul Peterson and Vladlena Sabodash, November 24, 2009.

Impact of PRD Participation in Day-Ahead Energy Market, prepared for NEPOOL Clients in Alternative Resources and End User Sectors, by Paul Peterson, Doug Hurley, and Vladlena Sabodash, October 16, 2009.

Synapse Report and Ohio Comments in Case No. 09-09-EL-COI, "The Value of Continued Participation in RTOs", prepared for Ohio Consumers' Counsel, by Paul Peterson, Ezra Hausman, Bob Fagan, and Vladlena Sabodash, May 26, 2009.

Energy Efficiency in the PJM Capacity Market, comments Before the Federal Energy Regulatory Commission (FERC), by Paul Peterson, January 9, 2009.

An RPM Case Study: Higher Costs for Consumers, Windfall Profits for Exelon: A study of the impacts of PJM's Reliability Pricing Model for the Illinois Citizens Utility Board, by Ezra Hausman, Paul Peterson, David White, and Bruce Biewald, October 18, 2005.

Capacity Revenues for Existing, Base Load Generation in the PJM Interconnection: A Pennsylvania Case Study: A report on the impacts of PJM's Reliability Pricing Model for the Pennsylvania Office of Consumer Advocate by Paul Peterson, David White, and Bruce Biewald, June 10, 2005.

Capacity for the Future: Kinky Curves and Other Reliability Options: A report on various approaches to pricing capacity resources for Northeast Consumer Advocate Offices, by Paul Peterson, David White, Amy Roschelle, and Bruce Biewald, December 20, 2004.

FERC's Transmission Pricing Policy: New England Cost Impacts: A report on the cost impacts of FERC's proposal to provide incentives to transmission owners through PL03-01-000 for New England Consumer Advocate Offices, by Paul Peterson, David White, Nick Doolittle, and Amy Roschelle, September 29, 2003.

The New England Experiment: An Evaluation of the Wholesale Electricity Markets: A report on the evolution of the New England electricity markets prepared for New England Consumer Advocate Offices by Paul Peterson, David White, Bruce Biewald, and Cliff Chen, June, 2003.

Financial Insecurity: The Increasing Use of Limited Liability Companies and Multi-Tiered

Holding Companies to Own Nuclear Power Plants: A Synapse Energy Economics, Inc. report prepared for the STAR Foundation and Riverkeeper, Inc., by David Schlissel, Paul Peterson, and Bruce Biewald, August 7, 2002.

Best Practices in Market Monitoring: A Survey of Current ISO Activities and Recommendations for Effective Market Monitoring and Mitigation in Wholesale Electricity Markets, prepared for the Maryland OPC, the Pennsylvania OCA, the Delaware DPA, the New Jersey DRA and the OPC of DC, November 2001.

The Other Side of Competitive Markets: Developing Effective Load Response in New England's Electricity Market, prepared for The Maine Department of Attorney General and the Maine Office of the Public Advocate, June 2001.

Clean Air and Reliable Power: Connecticut HB 6365 Will Not Jeopardize Electric System Reliability, prepared for The Clean Air Task Force on behalf of The Connecticut Coalition for Clean Air, May 2001.

UNIVERSITY OF VERMONT EXTENSION SERVICE

Residential Construction Survey, Survey of Vermont new home construction for construction techniques, energy-efficient design, appliance loads, etc. 1986, 1989.

Vermont Vacation Home Energy Study, Survey of vacation home energy consumption and impact on Vermont statewide electrical demand. 1989.

Dairy Farm Energy Use, A detailed examination of electrical energy consumption on forty Vermont dairy farms to identify opportunities for improving energy-efficiency. 1987.

Mobile Home Booklet, A fresh look at energy saving opportunities for mobile homeowners. Specific problems of cold climates are addressed. 1987.

Dairy Farm Energy Project, Implemented \$400,000 grant from Vermont Department of Agriculture for installation of milk-cooling equipment that also produced hot water. 1989.

Vocational Building Trades Instructors, Annual workshops on energy-efficient construction practices for the teachers of Vermont building trades students. Classroom presentations on selected topics. 1986 - 1989.

Brattleboro Community Energy Education Project, Coordinated a Central Vermont Public Service Company funded project to promote energy-efficiency awareness through community programs. 1985.

TESTIMONY

State of Vermont Public Service Board (2006): Review of Vermont Transmission Planning Process (Docket No. 7081)

Town of Charlotte, VT (2006): Summary of VELCO Northwest Reliability Testimony Docket (No. 6860)

Office of Consumer Advocate of the Commonwealth of Pennsylvania (2006): Comments on the FERC Technical Conference on RPM (Docket ER05-1410)

Arkansas Public Utilities Commission (2006): Resource Planning Guidelines for Electric Utilities and Consideration of Sec. 111(d)(12) of the Energy Policy Act of 2005 (Docket No. 06-028-R)

Texas Public Utilities Commission (2004): Petition of Entergy Gulf States for Certification of an Independent Organization for the Entergy Settlement areain Texas (Docket No. 28818)

Rhode Island Energy Facilities Siting Board (2004): Narragansett Electric Company E-183 115kV Transmission Line Relocation Project (Docket No. SB-2003-1)

CT Siting Council (2003): CL&P Application for a Transmission Facility (Docket No. 217)

Arizona Corporations Commission (2002): APS Generic Proceeding on Electric Restructuring (Docket No. E-00000A-02-00051)

Nevada Public Utilities Commission (2002): NPC Wholesale Markets Cost Recovery (Docket No. 01-11029)

PROFESSIONAL CONFERENCES

Federal Energy Regulatory Commission Conference, Philadelphia, PA. March 2001.
National Association Of Regulatory Utility Commissioners, Washington, DC. 1998 - 2000

Advanced Integrated Resource Planning Seminar, Berkeley, CA 1995

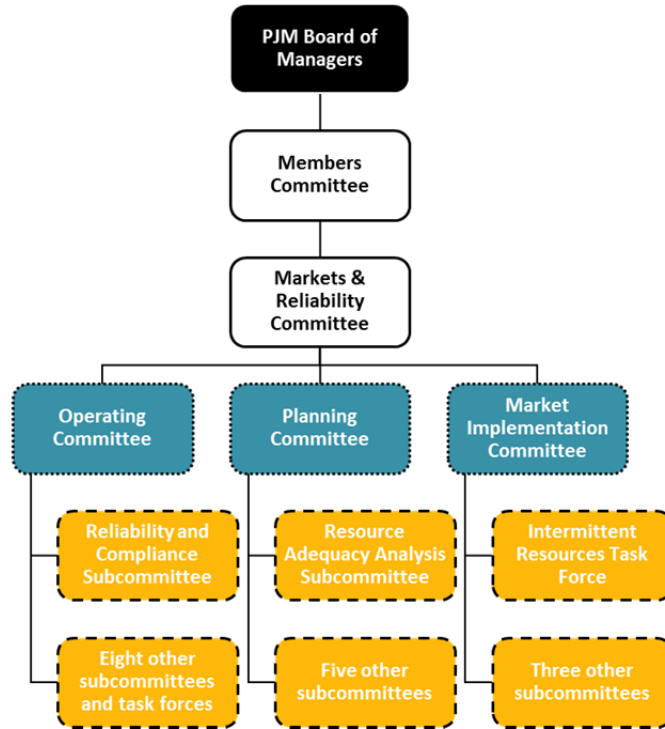
ACEEE Summer Study, Pacific Grove, CA 1992 & 1994

1991 DOE Low-Level Radioactive Waste Conference, Atlanta, GA

Resume dated November 2014.

Attachment PRP-2

Adapted PJM Stakeholder Process



- Sector-Weighted Voting
- Voting Includes Affiliates
- Consensus; Straw Voting