

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

**I/M/O The Merger of Exelon Corporation)
And PEPCO Holdings, Inc.) BPU Docket No. EM14060581**

DIRECT TESTIMONY OF

PAUL R. PETERSON

**ON BEHALF OF THE
DIVISION OF RATE COUNSEL**

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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 Division of Rate 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 RP-1.

20 .

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

22 A. Yes. I have previously testified before the Maryland Public Service Commission,
23 the Vermont Public Service Board, Connecticut Department of Public Utility

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

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

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

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

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

15

16 A. My findings are summarized as:

17

18 1. The merger of Exelon-PHI would not significantly increase generation ownership
19 to cause horizontal market power concerns, and the increased transmission
20 ownership from the merger is off-set, to a certain extent, by existing FERC-
21 enforced Open Access requirements for wholesale transactions. However, the
22 larger footprint of the merged Exelon-PHI creates several other concerns. There
23 are remaining concerns about the role of the new merged company in the
24 interconnection study process for new generation and in the setting of transfer
25 limits for elements of the transmission system.

- 1 2. On the resource side, there are concerns regarding potential market abuses arising
2 from the expanded participation of non-traditional resources such as demand
3 response (DR) and energy efficiency (EE) in wholesale capacity markets. The
4 merged Exelon-PHI will have generation and demand side resources that can be
5 offered into the energy, reserve, and capacity markets. Decisions about the
6 quantities of DR and EE to offer into these markets can have significant impacts
7 on the clearing prices paid to all resources. The proposed merger would provide
8 the new Exelon-PHI company with greater quantities of these resources and
9 expanded opportunities to impact clearing prices in more zones.
- 10 3. On the transmission side, the expanded control of transmission facilities that the
11 merger would create raises concerns about both the interconnection studies for
12 new independent generation facilities and the published line ratings that govern
13 flows over the bulk power system. Transmission owners are the primary sources
14 of information for both of these functions; the ability to delay competitive
15 generation through complex interconnection studies or prevent higher flows over
16 the wires by posting low line ratings are detrimental to an efficient, lower cost
17 system.
- 18 4. The proposed merger would also create new issues about governance in the PJM
19 stakeholder process. These governance concerns include both the ability to
20 influence PJM's independence and the impact on the decision making process in
21 committees, subcommittees and issue focused task forces.

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

2 A. The proposed merger will reduce the amount of competition in an industry that
3 needs to have more competitive entry at all levels. The new merged company will
4 increase Exelon's circuit miles of transmission owned by 65% (from Exelon's
5 current 7,177 circuit miles to a combined 11,819 circuit miles). Those combined
6 transmission assets received almost 25% of all transmission credits collected from
7 the PJM market according to the Independent Market Monitor. The proposed
8 merger would provide transmission and distribution services to more than 25%
9 new customers (Exelon's current 6.6 million electric customers will increase to a
10 combined 8.4 million electric customers). The merger takes two large companies
11 that are both members in PJM and reduces them to one. In weighing the benefits
12 and detriments of this merger, the reduced competition among providers of
13 resources, the reduced competition among builders of transmission facilities, and
14 the reduced participation in the RTO governance process are all detriments. It is
15 possible that the benefits of a merger outweigh the detriments; nonetheless the
16 detriments are real. Balancing the benefits and detriments is the task before this
17 Board.

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

19 To lessen the impacts of these potential detriments, the Board should only
20 approve the merger if the following conditions are met:

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

- 1 2. The new Exelon-PHI will allow an independent third-party review of all of its
2 demand resource offers, including decisions to not offer resources, into the
3 PJM energy market and the annual Base Residual Auction for capacity
4 resources.
- 5 3. The new Exelon-PHI will fully comply with Order 1000 principles that will
6 encourage competition in the construction of transmission facilities, including
7 the elimination of right-of-first-refusal for incumbent transmission owners.
- 8 4. The new Exelon-PHI will remain in PJM for the next ten years and, after the
9 ten year period, seek Board approval of any decision to leave PJM.
- 10 5. The new Exelon-PHI will explain how PHI affiliates in the PJM stakeholder
11 process will act independently to adopt positions and advance rule changes
12 that will benefit PHI customers, including ACE customers.
- 13 6. The new Exelon-PHI will explain how consolidating two votes to one vote in
14 the sector-weighted voting process in PJM will not negatively impact PHI
15 customers, including ACE customers.

16 **III. SPECIFIC ISSUES**

17

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

20 A. Traditional merger concerns about the increased concentration of generation
21 ownership and the potential for the exercise of horizontal market power do not
22 apply in this situation due to the previous divestiture of PHI generation assets and
23 overall competition from other generation resources. However, the proposed

1 merger will provide the new company with significant demand resource assets in
2 the form of demand response (DR) and energy efficiency (EE) resources. To the
3 extent that these resources are offered into the PJM energy market and the annual
4 Base Residual Auction to meet future capacity needs, they may displace
5 generation resources, including generation resources owned by the newly merged
6 entity. Decisions about the quantity of demand resources that will be entered into
7 these markets and the prices at which they are offered will create opportunities to
8 exercise market power. The new Exelon/PHI will be able to offer demand
9 resources (or withhold them) from the daily energy market and the annual
10 capacity auction in a manner that could affect prices in numerous PJM load zones
11 as well as on a system-wide basis.

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

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

20 However, if the merger is approved, the new entity may be able to
21 exercise a form of vertical market power in its review of interconnection requests
22 from new generation facilities. The study process for new generation requests is a
23 joint effort of the local transmission provider and PJM staff. As the local

1 transmission provider, the new Exelon/PHI could either delay the study process or
2 exaggerate the interconnection costs, or both, in an effort to prevent new
3 generation resources from competing with its existing resources.

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

12 All of these market power or market abuse concerns can be addressed
13 through specific mitigations in the form of an Order conditioning Board approval
14 of the merger on Exelon/PHI allowing greater scrutiny of its demand resource
15 offers into the daily energy market and the annual capacity auction by the IMM,
16 allowing an independent third-party review of the interconnection study process,
17 and submitting more detailed analyses to PJM and the IMM of the line ratings for
18 its transmission system under a variety of stressed conditions.

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

21 A. I have three general concerns regarding the proposed merger and its impact on the
22 PJM governance process. The first concern is the direct result of the proposed
23 merger; the other two concerns are about making an existing situation worse.

1 My first governance concern is that the proposed merger will create a new
2 entity with a larger footprint within the PJM Interconnection in terms of
3 customers served, combined transmission assets, and resources under its control.
4 This larger entity exacerbates the current situation in PJM where there are several
5 very large entities and hundreds of smaller entities that participate in the PJM
6 stakeholder process to develop rules and procedures for the entire PJM
7 Interconnection that spans 13 states and the District of Columbia. Because
8 participation in PJM is voluntary, one way to leverage influence with PJM staff is
9 to threaten to withdraw if particular Exelon/PHI positions are not supported by
10 PJM. The simple remedy for this problem is to require, as a condition of merger
11 approval, that the new Exelon/PHI will commit to remain in PJM for an extended
12 period of time and, after that time period, to submit to approval by this Board of
13 any decision to withdraw from the PJM Interconnection.

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

15 A. My second governance concern has to do with the voting structure for PJM upper
16 level committees. The Members Committee and the Markets & Reliability
17 Committee (MRC) have sector-weighted voting. Prior to the merger, Exelon and
18 PHI each have one vote. After the merger, there will be a single Exelon-PHI vote.
19 It is not clear the criteria that the newly merged company will use to cast its single
20 vote: how will the interests of all of Exelon's customers be represented by just
21 one vote, particularly when some affiliates may benefit from a vote in favor of a
22 particular change while other affiliates may see higher costs? The Board should

1 require Exelon to address this concern as a condition of approval of the proposed
2 merger.

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

4 A. My third governance concern has to do with the voting structure of the lower
5 committees, including working groups and task forces. The three standing
6 committees below the Members and MRC have simple majority voting with each
7 affiliate counting as a vote. All other sub-committees and task forces operate on a
8 consensus basis with no formal voting; however, each of these groups reports
9 back to one of the three standing committees. The use of a simple majority vote of
10 all members, with affiliates counted, creates concerns; the proposed merger of
11 Exelon and PHI will exacerbate those concerns. Simply stated, Exelon has 11
12 affiliate votes today; the merger will provide Exelon with four additional votes for
13 a total of 15. Attachment PRP 2 is a simplified version of the committee structure
14 in PJM that helps illustrate the various voting rules for each stakeholder
15 committee.

16 The standing committees typically delegate issues to a sub-group. In the
17 sub-groups, there are often straw polls to help narrow the issues under
18 consideration and try to achieve consensus. Sub-groups often report out a majority
19 view and minority views in their report to the standing committee. At the standing
20 committee, a simple majority vote for a proposal will end the voting process and
21 the issue then goes to the two senior committees for sector-weighted voting.
22 There are many instances when minority proposals are not even considered. The
23 governance issue in play here is that a few people (with many affiliates) at the

1 standing committee can dominate and control the issues. This is particularly a
2 problem for PJM members that may have special needs or unique perspectives on
3 issues. At the lower committees, the issues are framed through straw polls and
4 general consensus that may not provide for a minority view to even be passed up
5 to one of the standing committees. A minority view that makes it to the standing
6 committee now faces the same hurdle of simple majority voting; there are often a
7 few stakeholders casting ten or more votes based on their affiliates relationships.

8 The proposed merger will provide Exelon with even more votes than it has
9 today and eliminates the ability of PHI affiliates to vote their own interests. There
10 may be a market rule change that would be beneficial for many of Exelon's pre-
11 merger customers but not good for Atlantic City Electric (and perhaps other PHI
12 affiliates). How will the new Exelon/PHI vote at the Market Implementation
13 Committee? The same concern may apply to a transmission project that may
14 benefit one group of Exelon affiliates but impose some of the costs on all PJM
15 members. How will the new Exelon/PHI vote at the Planning Committee? One
16 possible solution would be to require Exelon to split its votes, as a merger
17 approval condition, at the lower and standing committees to reflect the divergent
18 interests of its affiliates. Even if Exelon agreed to this solution, there would be
19 questions about how it would be enforced. At a minimum, the Board should
20 recognize this as one of the negative aspects of the proposed merger and ask
21 Exelon to explain how it proposes to address this situation.

22

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

3 A. Yes. The proposed merger would reduce the number of potential competitors
4 providing Basic Generation Service (“BGS”) supply and Energy Service
5 Company (“ESCO”) services, as well as the number of Third Party Suppliers
6 (“TPS”). Constellation, an Exelon company, is supplier of power, natural gas,
7 renewable energy and energy management products. Constellation is currently a
8 wholesale BGS supplier in New Jersey and a TPS of electricity and gas in New
9 Jersey, as well as a provider of non-commodity energy services (energy
10 efficiency). In the past, an affiliate of ACE, Conectiv Energy Supply, participated
11 in the BGS auction as recently as 2010, although Conectiv has since sold its
12 generation assets. Furthermore, there is no indication that ACE’s affiliate will
13 continue to participate in the BGS auction as a supplier, albeit one without
14 generation assets.

15 Prior to the execution of the original merger agreement on April 29, 2014,
16 affiliates of ACE also provided TPS services and non-commodity ESCo services
17 in New Jersey. ACE now claims that it had fulfilled its TPS and ESCo contractual
18 obligations in 2013 and on May 29, 2014 filed requests with the BPU to withdraw
19 its existing licenses for these services. With the withdrawal of ACE affiliates from
20 the TPS and ESCo markets after the original merger agreement was executed,
21 there will be at least one less competitor in these areas post-merger.

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

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

ATTACHMENT PRP- 1

RESUME OF

PAUL R. PETERSON

Paul R. Peterson

Principal

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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 area in 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

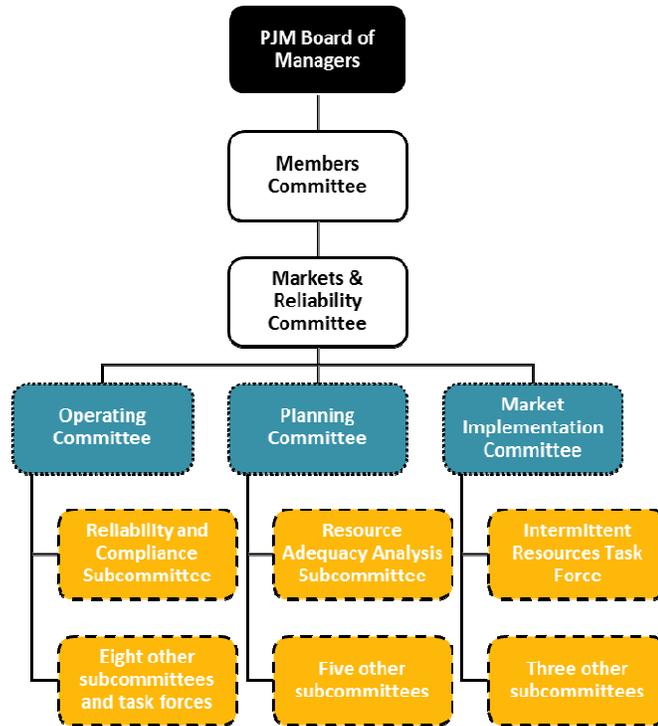
ACEEE Summer Study, Pacific Grove, CA 1992 & 1994

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

Resume dated November 2014.

ATTACHMENT PRP - 2

Adapted PJM Stakeholder Process Diagram



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