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Addendum StartPage: 0

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**PETITION OF ENTERGY GULF §
STATES, INC. FOR CERTIFICATION §
OF AN INDEPENDENT §
ORGANIZATION FOR THE ENTERGY §
SETTLEMENT AREA IN TEXAS §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

DIRECT TESTIMONY

OF

**PAUL R. PETERSON
SYNAPSE ENERGY ECONOMICS, INC.**

ON BEHALF OF

OFFICE OF PUBLIC UTILITY COUNSEL

VOLUME 1

April 26, 2004

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TABLE OF CONTENTS

VOLUME I

Page

Testimony1

EXHIBITS

Exhibit 1 Paul R. Peterson Resume15

VOLUME II

ATTACHMENTS

Attachment 1 Response to OPC1-25

Attachment 2 Excerpt from FERC Order 20009

Attachment 3 Joint Response of SeTrans stakeholders17

Attachment 4 FERC RTO Rules.....69

Attachment 5 FERC Order on Southwest Power Pool79

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

2 A. My name is Paul R. Peterson. I am a Senior Associate at Synapse Energy
3 Economics, Inc., 22 Pearl Street, Cambridge, MA 02139.

4 **Q. On whose behalf are you testifying in this case?**

5 A. I am testifying on behalf of the Texas Office of Public Utility Counsel.

6 **Q. Please summarize your educational background and recent work experience.**

7 A. I have twenty-four years of experience with electrical energy policy issues
8 through work with the University of Vermont Extension Service, the Vermont
9 Public Service Board, ISO New England, the operator of the regional electric grid
10 for New England, and, since March 2001, with Synapse Energy Economics.
11 Over the last 7 years, I have worked on electric restructuring issues directly
12 related to the six New England states, regional wholesale power markets, and
13 Federal Energy Regulatory Commission ("FERC") initiated proceedings. I
14 currently represent clients in the New England Power Pool ("NEPOOL")
15 Committee meetings and I am the voting representative at NEPOOL governance
16 meetings. I have recently testified in proceedings before state regulatory
17 commissions in Nevada, Arizona, Arkansas, and Rhode Island in regard to issues
18 related to regional transmission organizations and wholesale electricity markets. I
19 have also testified before the Connecticut Siting Council in 2002 on Northeast
20 Utilities' proposed 345kV transmission line between Bethel and Norwalk,
21 Connecticut. In 2003, I participated in a review of a proposed transmission line

1 upgrade in York County Maine. I have a BA from Williams College and a Juris
2 Doctor degree from Western New England College School of Law.

3 A copy of my current resume is attached as Exhibit PRP-1.

4 **Q. What is the purpose of your testimony?**

5 A. I was retained by the Texas Office of Public Utility Counsel to review the issues
6 raised by Entergy Gulf States, Inc. (EGSI)'s proposal to certify the Entergy
7 Transmission Organization (ETO) as the Independent Organization for Entergy
8 Settlement Area in Texas (ESAT) and to respond to the "ultimate question" raised
9 by the Commission in this proceeding.

10 **Q. What is the ultimate question to be addressed in this proceeding?**

11 A. As stated in the Commission's Preliminary Order approved at its March 10, 2004,
12 open meeting, the "ultimate question in this proceeding is whether EGSI's
13 affiliate, ETO, is sufficiently independent of any producer or seller of electricity
14 that its decision will not be unduly influenced by any producer or seller."

15 **Q. Please summarize your testimony.**

16 A. I conclude that, as proposed, the ETO, a business unit of EGSI's affiliate ESI, will
17 not be sufficiently independent for the following reasons:

- 18 1. The ETO is not structured to be sufficiently independent of EGSI or
19 Entergy Corporation and this lack of independence cannot be cured with
20 the proposed "third-party overseer" (TPO).

1 2. The ETO is not sufficiently independent within the meaning of the Texas
2 Public Utility Regulatory Act (PURA) §'39.151 in regard to independence
3 or functions.

4 3. The ETO does not satisfy the independence criteria for independent
5 transmission organizations as specified in the Orders and Regulations of
6 the Federal Energy Regulatory Commission.

7 Each of these reasons is described in greater detail below.

8 **Q. Please describe the structure of the ETO and its relationship to Entergy**
9 **Corporation and its subsidiaries.**

10 A. As described in the filed materials, the ETO is a business unit within Entergy
11 Services, Inc. (ESI), which is a wholly owned subsidiary of Entergy Corporation.
12 ESI provides corporate support and operations services to the five Entergy
13 Operating Companies, which are also wholly owned subsidiaries of Entergy
14 Corporation. EGSI is the Entergy Operating Company for ESAT.

15 **Q. How will this structure ensure that the ETO will operate independently of**
16 **any producer and seller of electricity in the ESAT region?**

17 A. This structure will not ensure that the ETO will operate with sufficient
18 independence. The ETO, as a business unit within ESI, will not have an
19 independent Board of Directors. Instead, the ETO will have a contractual-type
20 arrangement with ESI to perform its required functions. The ETO's annual
21 operating and capital budgets will be developed in conjunction with EGSI.
22 Ultimate approval of the budgets rests with Entergy Corporation's Board of

1 Directors. In addition, ETO employees will be eligible to purchase Entergy
2 Corporation stock through a 401k plan.

3 The above structural linkages between the ETO and Entergy Corporation and its
4 wholly owned subsidiaries, as described in the Application filing and response to
5 OPC1-2,¹ will make it difficult for the ETO to demonstrate to producers and
6 suppliers participating in the ESAT marketplace that its decisions are not
7 influenced by the potential impacts on Entergy Corporation and its related
8 entities.

9 **Q. Will the several codes of conduct described in Mr. Riley's Supplemental**
10 **Direct testimony ensure sufficient independence regarding ETO decisions?**

11 A. While the codes of conduct are important, they are probably not sufficient to
12 ensure independent decision making by the ETO. The codes of conduct, if
13 enforced, will limit some of the more egregious and blatant forms of improper
14 conduct because they prohibit the sharing of information and certain
15 communications between the ETO and market participants, including other
16 Entergy Corporation subsidiaries and affiliates. However, more subtle influences
17 on the ETO's decision making are likely to persist due to the lack of structural
18 separation. For example, ETO employees, managers, and executives will be
19 aware that their continued employment will be dependent on the renewal of their
20 contract(s) with ESI and Entergy Corporation. Similarly, ETO's annual budget

¹ Attachment 1.

1 will be subject to negotiation with EGSI and ultimate approval by Entergy's
2 Board of Directors. It is unreasonable to think that these relationships will have
3 no influence on the thousands of "independent" decisions, many of them
4 judgment calls, that the ETO will be making as it performs its functions.
5 Moreover, to the extent that ETO employees, managers, and executives are
6 stockholders in Entergy Corporation, they have an incentive to make decisions
7 that will ultimately benefit the parent company and the value of its stock.

8 **Q. Will the TPO ensure sufficient independence regarding ETO decisions?**

9 A. The fact that EGSI includes a "third-party overseer", or TPO, in its filed
10 application is an admission that the ETO, by itself, does not satisfy the ultimate
11 question posed by the Commission of "sufficiently independent". The ETO
12 functions that the TPO will review are a reasonably comprehensive list of the
13 critical decisions that the ETO will need to perform in an independent manner to
14 establish confidence among market participants that its actions are unbiased and
15 non-discriminatory. They include:

- 16 1. The calculation of total transmission capacity (TTC) and available
17 transmission capacity (ATC).
- 18 2. The actions taken during each transmission line relief (TLR) event.
- 19 3. Transactions involving incremental and decremental bids submitted by
20 market participants.
- 21 4. The review of transmission reservation requests by market participants.

1 5. The review of any complaints regarding the treatment of market
2 participant confidential information.

3 6. Any other actions taken by the ETO that the TPO, in its discretion,
4 chooses to investigate.

5 Unfortunately, the TPO is limited to reviewing, investigating, and reporting. It
6 does not have the authority to modify existing ETO practices, implement new
7 rules or procedures, prohibit any specific activities of the ETO, or penalize the
8 ETO for specific improper actions. If the TPO determines that the ETO is acting
9 in an unjust or discriminatory manner it has no authority to stop ongoing abuses
10 or implement corrective actions. Because the TPO can only report, and lacks any
11 authority over ETO actions, it cannot ensure that the ETO will perform its
12 functions “sufficiently independent of any producer or seller of electricity” as
13 required by the Commission.

14 **Q. Does the ETO satisfy the Texas statutory requirements for independence?**

15 A. PURA §39.151(b) states: “ ‘Independent organization’ means an independent
16 system operator *or other person* that is sufficiently independent of any producer
17 or seller of electricity . . .” The ETO proposed by EGSI in this proceeding is not a
18 corporation, a partnership, or any other type of separate legal entity, but only a
19 business unit of ESI. As such, the ETO does not satisfy the generally accepted
20 legal definition of a “person” as a discreet, free-standing, self-governing entity.
21 The Lawinfo Legal Dictionary defines “person” as

22 “an entity with legal rights and existence including the ability to
23 sue and be sued, to sign contracts, to receive gifts, to appear in

1 court either by itself or by lawyer and, generally, other powers
2 incidental to the full expression of the entity in law. Individuals
3 are "persons" in law unless they are minors or under some kind of
4 other incapacity such as a court finding of mental incapacity.
5 Many laws give certain powers to "persons" which, in almost all
6 instances, includes business organizations that have been formally
7 registered such as partnerships, corporations or associations."

8 Section 39.151(b) requires that the independent organization be a "person". I am
9 not aware of any state statutory schemes that grant the legal status of a "person"
10 to a business unit within an organization. EGSI has not satisfied the threshold
11 requirement of §39.151(b) that an independent organization be a "person".

12 **Q. Leaving aside the threshold issue of whether the ETO is a "person" under**
13 **Texas law, do you have other concerns regarding the statutory requirements**
14 **for independence?**

15 A. Yes. The language regarding independence in PURA § 39.151(b) parallels the
16 language used by the Commission in framing the "ultimate question" in this
17 proceeding in its Preliminary Order adopted at the Open Meeting of March 10,
18 2004. For all the reasons discussed above, regarding the Commission's ultimate
19 question, EGSI's proposal for an ETO, with a third-party overseer, fails to meet
20 the statutory requirements of "sufficiently independent".

21 **Q. Will the ETO be able to carry out its statutory functions?**

22 A. PURA § 39.151(a) identifies four functions that an independent organization,
23 such as the ETO proposed by EGSI, must perform. Based on the conclusions
24 reached above regarding the ETO's lack of sufficient independence, function (1),
25 "ensure access to the transmission and distribution systems for all buyers and
26 sellers of electricity on nondiscriminatory terms", may be the most difficult

1 function for the ETO to achieve given its inherent conflicts as an Entergy
2 organization. Function (2), “ensure the reliability and adequacy of the regional
3 electrical network”, function (3), “ensure that information relating to a customer’s
4 choice of retail electric provider is conveyed in a timely manner to the persons
5 who need that information, and function (4), “ensure that electricity production
6 and delivery are accurately accounted for among the generators and wholesale
7 buyers and seller in the region”, are less likely to be subject to improper
8 implementation by the ETO. However, even functions (2), (3), and (4) may
9 occasionally require judgment calls that the ETO must exercise. For example, the
10 ETO may conclude that the regional electric network is “reliable and adequate”
11 based on the current utilization of the system, but other market participants may
12 believe that additional transmission infrastructure is needed to accommodate new
13 generation resources. The ETO, due to its structural relationships to Entergy
14 Corporation and its subsidiaries, may not be the appropriate entity to make the
15 judgment call on whether new upgrades are “needed” pursuant to function (2).

16 **Q. Are FERC’s RTO independence criteria appropriate for consideration in**
17 **this proceeding?**

18 A. Yes. The Commission’s Preliminary Order, adopted on March 10, 2004, states
19 on page 8, “[t]he Commission also finds that it is appropriate to consider FERC
20 criteria for RTO independence in determining whether an entity is sufficiently
21 independent under PURA”.

1 **Q. Please describe the FERC RTO independence criteria.**

2 A. I will discuss two aspects of FERC's RTO independence criteria. The first is a
3 principle that FERC has stated in numerous orders. In Order 2000 FERC stated
4 that

5 [T]he principle of independence is the bedrock upon which the ISO
6 must be built and that this standard should apply to all RTOs,
7 whether they are ISOs, transcos or variants of the two. Virtually all
8 commentators agree with this principle.²

9 In virtually every Order that FERC has issued approving an entity for ISO or RTO
10 status, or approving an interim process to eventually achieve ISO or RTO status,
11 this “independence” principle has been highlighted and strictly applied to the
12 entity’s application. In a January FERC filing, stakeholders in the SeTrans RTO
13 process protested the abrupt termination of the efforts to form an Order 2000
14 compliant RTO by the SeTrans Sponsors (including Entergy Corporation).³ In
15 their filing, the stakeholders identified the serious deficiencies of RTO entities
16 that do not meet FERC’s Order 2000 requirements. In particular, the stakeholders
17 asked FERC to take action to require Entergy Corporation (and Southern
18 Company) to provide for independent operation of their OASIS systems,
19 including the scheduling and tagging of transmission transactions, the
20 determination of TTC and ATC, transmission maintenance scheduling, and “any
21 other factors affecting the availability of transmission service”.⁴

² Attachment 2. 89 FERC 61,285 (December 1999) at pp.153-154 [footnotes omitted].

³ Attachment 3. Joint Response of Indicated Stakeholders, Docket Nos. EL02-101-000 et al (February 13, 2004).

⁴ Id. at p.17.

1 The complaints identified in the Indicated Stakeholders FERC filing, and their
2 proposed remedies, may be useful to the Commission in resolving the
3 independence issues in this proceeding.

4 **Q. What is the second aspect of FERC's RTO independence criteria?**

5 A. The second aspect is the FERC rules and regulations for RTOs under Title 18 of
6 the Federal Code of Regulations (CFR).⁵ 18 CFR § 35.34 (1) states:

7 *Regional transmission organization* means an entity that satisfies
8 the minimum characteristics set forth in paragraph (j) of this
9 section, performs the functions set forth in paragraph (k) of this
10 section, and accommodates the open architecture condition set
11 forth in paragraph (l) of this section.

12 18 CFR § 35.34(j)(1) states:

13 *Independence.* The Regional Transmission Organization must be
14 independent of any market participant. The Regional
15 Transmission organization must include, as part of its
16 demonstration of independence, a demonstration that it meets the
17 following:

- 18 (i) The Regional Transmission Organization, its
19 employees, and any non-stakeholder directors must
20 not have financial interests in any market
21 participant.
- 22 (ii) The Regional Transmission Organization must have
23 a decision making process that is independent of
24 control by any market participant or class of
25 participants.
- 26 (iii) The Regional Transmission Organization must have
27 exclusive and independent authority under section
28 205 of the Federal Power Act (16 U.S.C. 824d) to

⁵ Attachment 4. 18 CFR § 35.34.

1 propose rates, terms and conditions of transmission
2 service provided over the facilities it operates.

3
4 As proposed by EGSI in this proceeding, the ETO fails all of FERC's
5 independence criteria. The ETO is not independent of market participants
6 because it is a business unit within ESI, an affiliate of EGSI and Entergy
7 Corporation, both of whom qualify as market participants under §34.35(2)(i). In
8 addition, the ETO has a financial interest in the performance of both EGSI and
9 Entergy Corporation. The ETO does not have an independent decision making
10 process, nor does it have "exclusive and independent authority" to file under
11 Section 205 of the Federal Power Act.

12 **Q. Will the ETO perform functions that are significantly different than those**
13 **that an RTO would perform?**

14 A. No. An RTO performs some additional functions, but all the functions
15 ascribed to the ETO in this proceeding are the same as the ones that an RTO
16 would perform. The specific RTO functions are listed under 18 C.F.R. §35.34(k).
17 They include: transparent transmission pricing; transmission reservation service;
18 management of transmission congestion; administration of the OATT; and
19 transmission planning and expansion to ensure adequate and reliable service.
20 These functions are all similar to functions assigned to the ETO.

21 **Q. Are you familiar with the Commission's Order No. 9 in this proceeding,**
22 **issued on April 19, 2004?**

23 A. Yes, I reviewed a copy of Order No.9 on April 21, 2004.

1 **Q. Can you provide a response to the issue raised in that Order?**

2 A. I have not had sufficient time to analyze the potential costs and benefits of having
3 EGSI join the Southwest Power Pool (SPP), as an alternative to implementing the
4 ETO proposal supported by EGSI in this proceeding. Performing such a
5 comparative analysis raises some complex issues regarding the existing
6 contractual arrangements between EGSI and the other operating system
7 subsidiaries of the Entergy Corporation. However, in regard to the “ultimate
8 question” presented by the Commission in this proceeding, the SPP would
9 certainly satisfy the “sufficiently independent” requirement. The SPP has
10 received conditional approval from FERC as an Order 2000 compliant regional
11 transmission organization.⁶ As such, it will satisfy FERC independence criteria
12 and, most likely, the PURA §39.151 (b) and (m) criteria, too.

13 **Q. Do you have any concluding remarks?**

14 A. Yes. My testimony will support a Commission decision that EGSI’s
15 application should be denied. The ETO does not meet the “sufficiently
16 independent” test identified by the Commission as the ultimate question in this
17 proceeding because it is not structurally separate from Entergy Corporation and
18 its subsidiaries and affiliates. The ETO does not meet the independence criteria
19 of Texas statutes as specified in PURA § 39.151(b). And, the ETO does not meet
20 FERC’s independence criteria for a regional transmission organization as
21 specified in FERC Orders and 18 C.F.R. § 35.34(j).

⁶ Attachment 5. 106 FERC 61, 110 (February 2004).

1 Without an independent system administrator, implementing retail choice in
2 ESAT should not go forward.

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

4 **A. Yes.**

EXHIBIT PRP-1

Paul R. Peterson

Senior Associate

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EMPLOYMENT

Synapse Energy Economics Inc., Cambridge, MA. Senior Associate, 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. Provide analysis and expert testimony on electric restructuring issues in New England, Nevada, Arizona, and Arkansas. Co-author of numerous reports on wholesale electricity markets and FERC policy 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

Tax Law for Non-Tax Law Attorneys, May 2000
International Law Update, June 2000

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

PUBLICATIONS & PROJECTS

SYNAPSE ENERGY ECONOMICS

Strategies for Procuring Residential and Small Commercial Standard Offer Supply in Maine, prepared for Maine Office of Public Advocate, April 7, 2004.

FERC's Transmission Pricing Policy: New England Cost Impacts, prepared for Massachusetts Office of Attorney General, Connecticut Office of Consumer Counsel, Maine Office of the Public Advocate, and New Hampshire Office of Consumer Advocate, September 29, 2003.

The New England Experiment: An Evaluation of the Wholesale Electricity Markets, prepared for Connecticut Office of Consumer Counsel, Maine Office of the Public Advocate, and New Hampshire Office of Consumer Advocate, June 2003.

Financial Insecurity: The Increasing Use of Limited Liability Companies and Multi-Tiered Holding Companies to Own Nuclear Power Plants, prepared for the STAR Foundation and Riverkeeper, Inc, 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

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)

CT DPUC (2000)

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