

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE)
COMPANY LLC PURSUANT TO IND. CODE §§8-1-2-42.7,)
8-1-2-61 AND 8-1-2.5-6 FOR (1) AUTHORITY TO MODIFY)
ITS RETAIL RATES AND CHARGES FOR ELECTRIC)
UTILITY SERVICE THROUGH A PHASE IN OF RATES;)
(2) APPROVAL OF NEW SCHEDULES OF RATES AND)
CHARGES, GENERAL RULES AND REGULATIONS,)
AND RIDERS (BOTH EXISTING AND NEW); (3))
APPROVAL OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL OF)
NECESSARY AND APPROPRIATE ACCOUNTING)
RELIEF, INCLUDING, BUT LIMITED TO, AUTHORITY)
TO CAPITALIZE AS RATE BASE ALL EXPENDITURES)
FOR IMPROVEMENTS TO PETITIONER'S)
INFORMATION TECHNOLOGY SYSTEMS THROUGH)
THE DESIGN, DEVELOPMENT, AND)
IMPLEMENTATION OF A WORK AND ASSET)
MANAGEMENT ("WAM") PROGRAM, TO THE EXTENT)
NECESSARY; AND (5) APPROVAL OF ALTERNATIVE)
REGULATORY PLANS FOR THE PARTIAL WAIVER OF)
170 IAC 4-1-16(f) AND PROPOSED REMOTE)
DISCONNECTION AND RECONNECTION PROCESS)
AND, TO THE EXTENT NECESSARY,)
IMPLEMENTATION OF A LOW INCOME PROGRAM)

OFFICIAL
EXHIBITS

CAUSE NO. 46120

IURC
INTERVENOR'S

EXHIBIT NO.

3-25-25

DATE

REPORTER

MELISSA WHITED

VICE PRESIDENT AT
SYNAPSE ENERGY ECONOMICS

TESTIMONY OFFERED ON BEHALF OF
LA PORTE COUNTY BOARD OF COMMISSIONERS

Intervenor's Exhibit 3

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name, title, and employer.**

3 A. My name is Melissa Whited. I am a Vice President at Synapse Energy Economics
4 (Synapse), located at 485 Massachusetts Avenue, Cambridge, MA 02139.

5 **Q. Please describe Synapse Energy Economics.**

6 A. Synapse is a research and consulting firm specializing in electricity and gas industry
7 regulation, planning, and analysis. Our work covers a range of issues, including
8 economic and technical assessments of demand-side and supply-side energy resources;
9 energy efficiency policies and programs; integrated resource planning; electricity market
10 modeling and assessment; renewable resource technologies and policies; and climate
11 change strategies. Synapse works for a wide range of clients, including state attorneys
12 general, offices of consumer advocates, trade associations, public utility commissions,
13 environmental advocates, the U.S. Environmental Protection Agency, U.S. Department of
14 Energy, U.S. Department of Justice, the Federal Trade Commission, and the National
15 Association of Regulatory Utility Commissioners. Synapse has over 40 professional staff
16 with extensive experience in the electricity industry.

17 **Q. Please summarize your professional and educational experience.**

18 A. I have 13 years of experience in economic research and consulting. At Synapse, I have
19 worked extensively on issues related to utility regulatory models and rate design. I have
20 been an invited speaker in numerous industry conferences, including as a panelist for the
21 National Association of Regulatory Utility Commissioners (NARUC) Subcommittee on

1 Rate Design at the 2021 Winter Policy Summit and the 2018 Annual Meeting. In 2023, I
2 was a panelist at the New England Electricity Restructuring Roundtable on
3 Electrification, Rate Design, and Equity where I presented case studies for supporting
4 electrification in a manner that reduces grid costs and promotes equity.

5 I have sponsored testimony before the Massachusetts Department of Public Utilities
6 (Department or DPU), the Illinois Commerce Commission, the New Hampshire Public
7 Utilities Commission, the Georgia Public Service Commission, the Rhode Island Public
8 Utilities Commission, the Maine Public Utilities Commission, the California Public
9 Utilities Commission, the Hawaii Public Utilities Commission, the Public Service
10 Commission of Utah, the Public Utility Commission of Texas, the Virginia State
11 Corporation Commission, the Newfoundland and Labrador Board of Commissioners of
12 Public Utilities, and the Federal Energy Regulatory Commission. I hold a Master of Arts
13 in Agricultural and Applied Economics and a Master of Science in Environment and
14 Resources, both from the University of Wisconsin-Madison. My resume is attached as
15 Exhibit MW-1.

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

17 A. I am testifying on behalf of the Board of County Commissioners of LaPorte County,
18 Indiana ("LaPorte County").

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

2 A. The purpose of my testimony is to address the appropriate return on equity (ROE) for
3 Northern Indiana Public Service Company in light of its high rates and recent dismal
4 performance related to customer satisfaction and reliability.

5 **Summary of Conclusions and Recommendations**

6 **Q. Please summarize your conclusions.**

7 A. My conclusions are as follows:

- 8 • NIPSCO's rate increase would undermine customer affordability, as its rates are
9 already among the highest in Indiana. If NIPSCO's rate increase is granted, a
10 typical residential customer's bill would be between 32 percent and 78 percent
11 higher than customers of other Indiana IOUs.
- 12 • Despite NIPSCO's skyrocketing rates, the Company performs poorly in customer
13 satisfaction and service reliability. Based on data from 2021-2024, NIPSCO ranks
14 last in business customer satisfaction and trails behind other Midwestern utilities
15 in residential satisfaction. Its reliability performance is no better—NIPSCO's
16 interruption duration is the worst of all Indiana IOUs.
- 17 • NIPSCO's proposed ROE of 10.6 percent is unreasonable given its failure to
18 adequately address customer affordability and service quality.

1 **Q. Please summarize your recommendations.**

2 A. Because NIPSCO has shown poor management efficiency in meeting its customers' needs
3 for reliable utility service at fair and reasonable rates, I recommend that the Commission
4 set NIPSCO's return on equity at the lower end of the range of reasonableness. As
5 discussed in LaPorte County witness Michael R. O'Connell's direct testimony, the lower
6 end of the range of reasonableness is 9 percent.

7 **II. NIPSCO'S REQUESTED RATE INCREASE**

8 **Q. Please describe NIPSCO's requested rate increase.**

9 A. NIPSCO has requested a system-wide revenue increase of 20.1 percent, which is based
10 on a 10.6 percent return on equity.¹ This revenue request follows close on the heels of
11 NIPSCO's last case, decided in 2023, in which the Company was awarded a rate increase
12 of approximately 19 percent.²

13 **Q. How would NIPSCO's requested rate increase impact customers?**

14 A. NIPSCO's requested rate increase raises serious affordability concerns. In recent years,
15 NIPSCO's rates have skyrocketed, as have customer bills. NIPSCO's residential
16 customers already pay the highest electric bills of any investor-owned utility (IOU) in
17 Indiana, and this would only be exacerbated by NIPSCO's requested rate increase.

¹ Cause No. 46120. Petitioner's Exhibit No. 2. September 12, 2024. Pages 22-23.

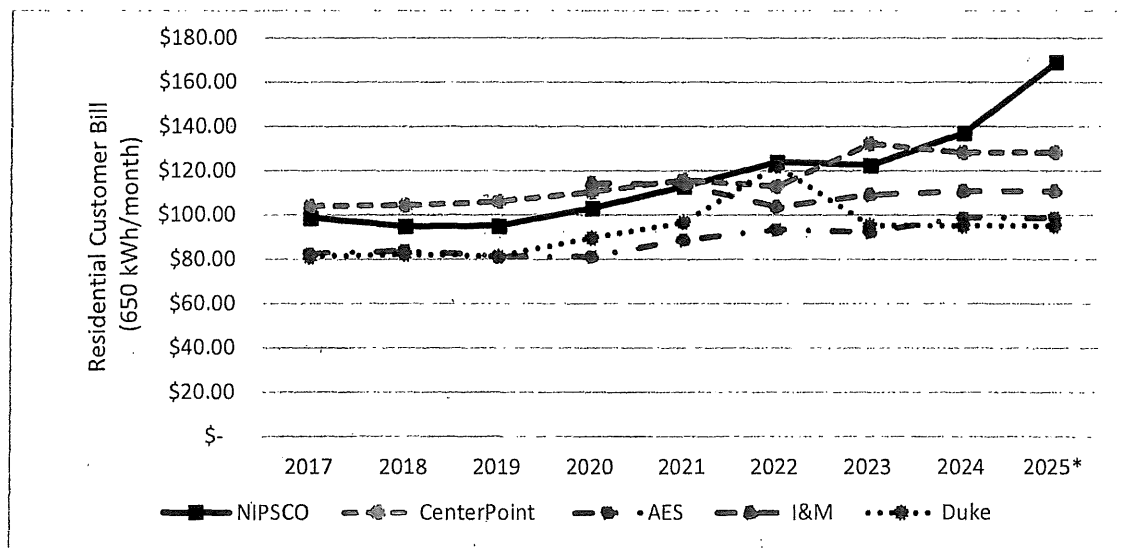
² According to the order approving the settlement, NIPSCO originally proposed a revenue increase of \$395 million, equal to an increase of 25.85%. The settlement approved an increase of \$291.8 million, or approximately a 19% increase in rates. Indiana Utility Regulatory Commission. Cause No. 45772. Order of the Commission. August 2, 2023, at 7-10.

Currently, a residential customer averaging 650 kWh per month pays a bill of approximately \$137. If NIPSCO's rate increase is granted, this customer's bill would jump to \$169/month—a 72 percent increase from 2017.³

Q. Are NIPSCO's rates in line with other Indiana electric utilities?

A. No. If NIPSCO's rate increase is granted, an average residential customer's bill would be 32 percent higher than at any other Indiana IOUs, and 78 percent higher than at Duke Indiana.⁴ The degree to which NIPSCO's rates exceed its peers is illustrated in the figure below, with the residential bill for a NIPSCO customer shown by the red solid line.

Figure 1. Residential Monthly Electric Bills (650 kWh/month)



Note: 2025 assumes that NIPSCO's requested rate increase is granted. It does not assume any rate increase for other utilities.

³ Synapse analysis based on RateAcuity historical utility rate database.

⁴ Synapse analysis based on RateAcuity historical utility rate database.

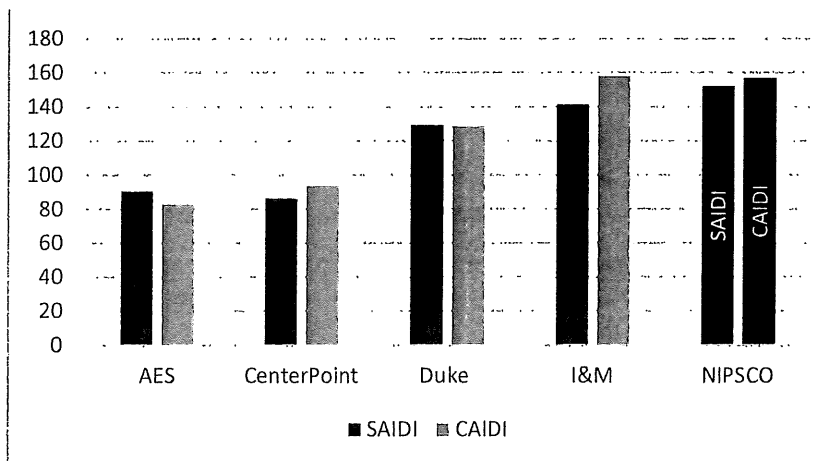
III. NIPSCO'S RELIABILITY AND CUSTOMER SATISFACTION PERFORMANCE

Q. Please describe NIPSCO's reliability performance relative to its peers.

A. Based on the 2023 IURC Electric Utility Reliability Report, NIPSCO's reliability performance has been among the worst in Indiana in recent years. For example, for the period of 2019-2023, the average duration of NIPSCO's service outages (excluding major event days) was longer than any other Indiana electric IOU.⁵ NIPSCO's average SAIDI (System Average Interruption Duration Index) performance relative to other Indiana utilities is shown in Figure 2 below.

Further, the average outage time experienced by NIPSCO customers was nearly the highest of all of the Indiana electric investor-owned utilities. This is shown by CAIDI (Customer Average Interruption Duration Index) in the figure below.

Figure 2. 2019-2023 Reliability Statistics for Indiana IOUs



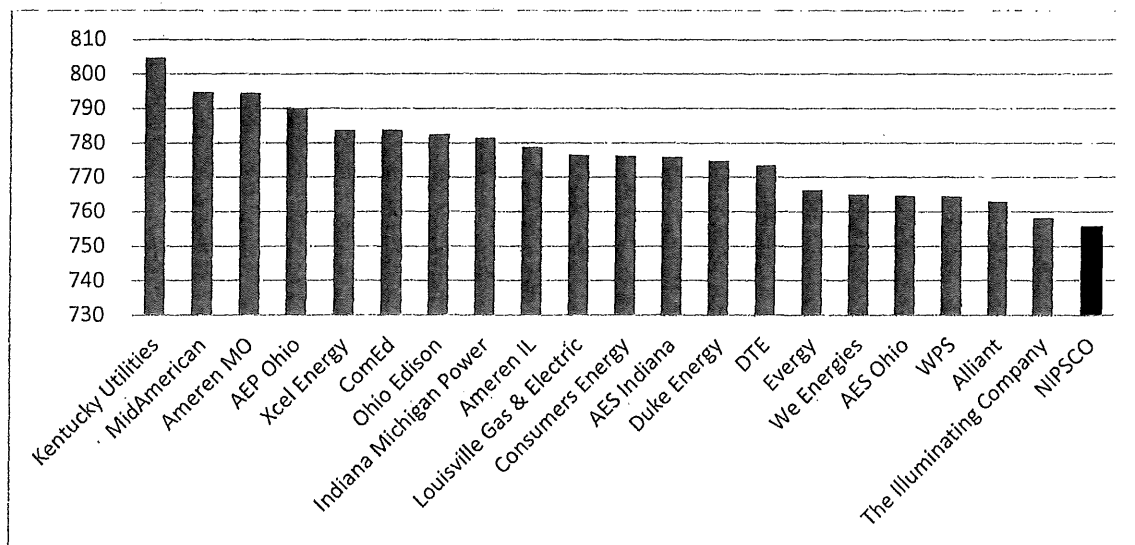
Source: Indiana Utility Regulatory Commission Electric Utility Reliability Report 2023, Electric Reliability Not Including Major Events

⁵ Indiana Utility Regulatory Commission Electric Utility Reliability Report 2023, Electric Reliability Not Including Major Events, p. 5. Available at <https://www.in.gov/iurc/files/Electric-Utility-Reliability-Report-2023.pdf>.

1 **Q. Please describe NIPSCO's customer service performance relative to its peers.**

2 A. NIPSCO's customer satisfaction scores, as reported by J.D. Power, fluctuate yearly but
3 are generally poor. Satisfaction among business customers is especially dismal, with
4 NIPSCO ranking last out of all electric utilities in the Midwest surveyed by J.D. Power
5 based on the average of its scores for the period 2021-2024.⁶ NIPSCO's average score
6 relative to these other utilities is shown in the figure below.

7 **Figure 3. Average J.D. Power Customer Satisfaction Score for Midwestern Utilities - Business**
8 **Customers Based on Average of 2021-2024**

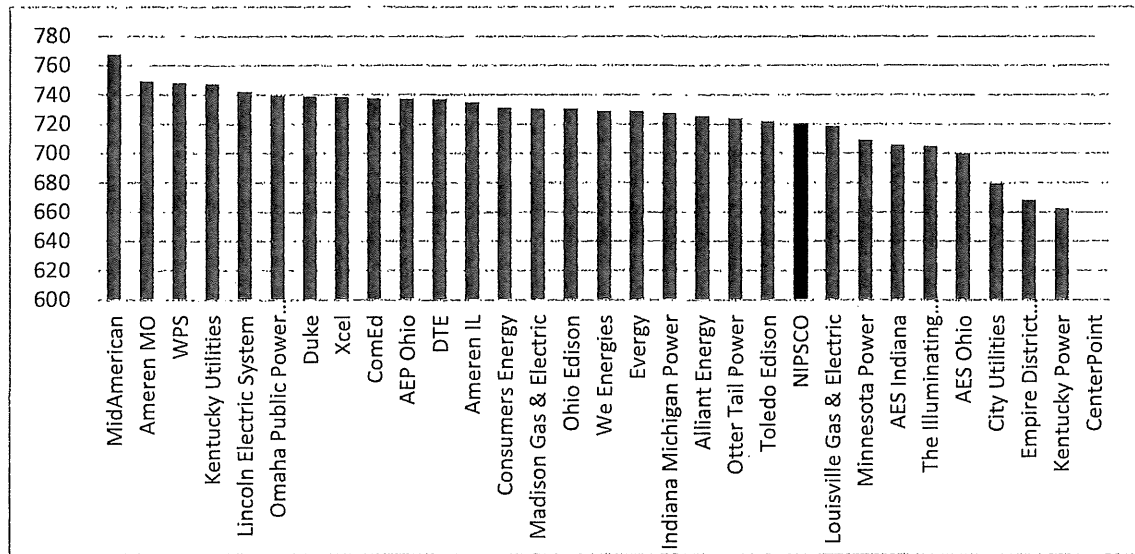


9
10 Customer satisfaction has been higher among residential customers than business
11 customers for the period 2021-2024, but NIPSCO still trails most other utilities in the

⁶ J.D. Power electric utility satisfaction data for business customers from 2021-2024 available at:
<https://www.jdpower.com/business/press-releases/2021-electric-utility-business-customer-satisfaction-study>,
<https://www.jdpower.com/business/press-releases/2022-electric-utility-business-customer-satisfaction-study>,
<https://www.jdpower.com/business/press-releases/2023-electric-utility-business-customer-satisfaction-study>, and
<https://www.jdpower.com/business/press-releases/2024-electric-utility-business-customer-satisfaction-study>.

Midwest. The Company's average score places it 22nd out of 31 utilities, as shown in the figure below.⁷

Figure 4. Average J.D. Power Customer Satisfaction Score for Midwestern Utilities - Residential Customers Based on Average of 2021-2024



Q. Has NIPSCO's customer satisfaction performance improved in recent years?

A. After falling to its lowest point in 2022, NIPSCO posted improvements in business customer satisfaction performance for 2023 and 2024. However, at the same time, its residential customer satisfaction has fallen steadily since 2021. Thus, there are no clear indications that NIPSCO is making meaningful improvements in terms of customer satisfaction.

⁷ J.D. Power electric utility satisfaction data for residential customers from 2021-2024 available at: <https://www.jdpower.com/business/press-releases/2021-electric-utility-business-customer-satisfaction-study>, <https://www.jdpower.com/business/press-releases/2022-electric-utility-residential-customer-satisfaction-study>, <https://www.jdpower.com/business/press-releases/2023-electric-utility-residential-customer-satisfaction-study>, and <https://www.jdpower.com/business/press-releases/2024-us-electric-utility-residential-customer-satisfaction-study>.

1 **IV. ADJUSTMENTS TO UTILITY EARNINGS BASED ON PERFORMANCE**

2 **Q. Is it reasonable for the Commission to consider NIPSCO's performance when**
3 **setting its ROE?**

4 A. Yes. In the absence of competition, the Commission serves as a substitute for market
5 forces to ensure that utilities furnish reasonably adequate service and facilities, that the
6 rates charged are just and reasonable, and that utilities generally act in the public interest.

7 **Q. Has the Commission previously considered utilities' performance when setting the**
8 **allowed ROE?**

9 A. Yes. For example, in Cause No. 42359, the Commission recognized that a utility's
10 performance is an appropriate consideration in determining a utility's cost of equity, and
11 that both a utility's reliability and the quality of its customer service deserve
12 consideration in the Commission's cost of equity determination.⁸

13 With respect to NIPSCO specifically, in the Company's 2008 rate case, the Commission
14 pointed to NIPSCO's three-year trend of poor customer satisfaction and stated that the
15 Commission sometimes needs to "send a clear and direct message to utility management
16 concerning the need for improvement in the provision of its utility service."⁹ The
17 Commission noted that its determination of the authorized cost of equity can be a direct
18 way to incentivize improved utility service. Given these considerations, the Commission
19 approved an ROE that it recognized as reflecting the low end of the reasonable range.

⁸ Commission Order in Cause No. 42359. May 18, 2004. Page 53.

⁹ Commission Order in Cause No. 43526. August 25, 2010. Page 32.

1 Finally, the Commission noted that improved performance could justify a higher return in
2 the next rate case.¹⁰

3 **Q. How should the Commission consider NIPSCO's performance in this proceeding?**

4 A. I urge the Commission to consider NIPSCO's performance in terms of affordability,
5 customer satisfaction, and reliability. NIPSCO's skyrocketing rates indicate poor
6 management efficiency, particularly when viewed in light of its dismal customer
7 satisfaction ratings and reliability. Because NIPSCO has failed to meet its customers'
8 needs for reliable utility service at fair and reasonable rates, I recommend that the
9 Commission set NIPSCO's return on equity at or near the lowest level of the range of
10 reasonableness. As discussed in LaPorte County witness Michael R. O'Connell's direct
11 testimony, the lower end of the range of reasonableness is 9 percent.

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

13 A. Yes, it does.

¹⁰ Commission Order in Cause No. 43526. August 25, 2010. Pages 31-33.

Melissa Whited, Vice President, Consulting

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PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Cambridge MA. *Vice President*, April 2023 – Present; *Senior Principal*, May 2022 – April 2023, *Principal Associate*, 2017 – May 2022, *Senior Associate*, 2015 – 2017, *Associate*, 2012 – 2015

Consult and provide analysis of rate design proposals, alternative regulation, and other topics including distributed energy resources and electric vehicles. Develop expert witness testimony in public utility commission proceedings. Author reports on topics at the intersection of utility regulation, customer protection, and environmental impacts.

University of Wisconsin - Madison, Department of Agricultural and Applied Economics, Madison, WI. *Teaching Assistant – Environmental Economics*, 2011 – 2012

Developed teaching materials and led discussions on cost-benefit analysis, carbon taxes and cap-and-trade programs, management of renewable and non-renewable resources, and other topics.

Public Service Commission of Wisconsin, Water Division, Madison, WI. *Program and Policy Analyst - Intern*, Summer 2009

Researched water conservation programs nationwide to develop a proposal for Wisconsin's state conservation program. Developed spreadsheet model to calculate avoided costs of water conservation in terms of energy savings and avoided emissions.

Synapse Energy Economics, Cambridge, MA. *Communications Manager*, 2005 – 2008

Developed technical proposals for state and federal agencies, environmental and public interest groups, and businesses. Edited reports on energy efficiency, integrated resource planning, greenhouse gas regulations, renewable resources, and other topics.

EDUCATION

University of Wisconsin, Madison, WI

Master of Arts in Agricultural and Applied Economics, 2012

Certificate in Energy Analysis and Policy

National Science Foundation Fellow

University of Wisconsin, Madison, WI

Master of Science in Environment and Resources, 2010

Certificate in Humans and the Global Environment

Nelson Distinguished Fellowship

Southwestern University, Georgetown, TX

Bachelor of Arts in International Studies, *Magna cum laude*, 2003.

ADDITIONAL SKILLS

- Econometric Modeling – Linear and nonlinear modeling including time-series, panel data, logit, probit, and discrete choice regression analysis
- Nonmarket Valuation Methods for Environmental Goods – Hedonic valuation, travel cost method, and contingent valuation
- Cost-Benefit Analysis
- Input-Output Modeling for Regional Economic Analysis

FELLOWSHIPS AND AWARDS

- Winner, M. Jarvin Emerson Student Paper Competition, Journal of Regional Analysis and Policy, 2010
- Fellowship, National Science Foundation Integrative Graduate Education and Research Traineeship (IGERT), University of Wisconsin – Madison, 2009
- Nelson Distinguished Fellowship, University of Wisconsin – Madison, 2008

PUBLICATIONS

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Shenstone-Harris, S., A. Zeng, L. Metz, M. Whited. 2024. *On the Road to Fleet Electrification: A Framework for Estimating Distribution System Impacts of Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for Advanced Energy United.

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Kallay, J., A. Napoleon, B. Havumaki, J. Hall, C. Odom, A. Hopkins, M. Whited, T. Woolf, M. Chang, R. Broderick, R. Jeffers, B. Garcia. 2021. *Performance Metrics to Evaluate Utility Resilience Investments*. Synapse Energy Economics for Sandia National Laboratories.

Kallay, J., A. Hopkins, A. Napoleon, B. Havumaki, J. Hall, M. Whited, M. Chang., R. Broderick, R. Jeffers, K. Jones, M. DeMenno. 2021. *The Resilience Planning Landscape for Communities and Electric Utilities*. Synapse Energy Economics for Sandia National Laboratories.

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National Energy Screening Project. 2020. *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources*. E4TheFuture, Synapse Energy Economics, Energy Futures Group, ICF, Pace Energy and Climate Center, Schiller Consulting, Smart Electric Power Alliance.

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White, D., K. Takahashi, M. Whited, S. Kwok, D. Bhandari. 2019. *Memphis and Tennessee Valley Authority: Risk Analysis of Future TVA Rates for Memphis*. Synapse Energy Economics for Friends of the Earth.

Whited, M., B. Havumaki. 2019. *GD2019 04 M: DC DOEE Comments Responding to Notice of Inquiry*. Synapse Energy Economics for the District of Columbia Department of Energy and Environment.

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Whited, M., C. Roberto. 2019. *Multi-Year Rate Plans: Core Elements and Case Studies*. Synapse Energy Economics for Maryland PC51 and Case 9618.

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Whited, M., J. Kallay, D. Bhandari, B. Havumaki. 2018. *Driving Transportation Electrification Forward in Pennsylvania: Considerations for Effective Transportation Electrification Ratemaking*. Synapse Energy Economics for Natural Resources Defense Council.

Hall, J., J. Kallay, A. Napoleon, K. Takahashi, M. Whited. 2018. *Locational and Temporal Values of Energy Efficiency and other DERs to Transmission and Distribution Systems*. Synapse Energy Economics.

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Whited, M., A. Allison, R. Wilson. 2018. *Driving Transportation Electrification Forward in New York: Considerations for Effective Transportation Electrification Rate Design*. Synapse Energy Economics on behalf of the Natural Resources Defense Council.

Allison, A. and M. Whited. 2018. "Electric Vehicles Still Not Crashing the Grid: Updates from California." Synapse Energy Economics on behalf of the Natural Resources Defense Council.

Fisher, J., M. Whited, T. Woolf, D. Goldberg. 2018. *Utility Investments for Market Transformation: How Utilities Can Help Achieve Energy Policy Goals*. Synapse Energy Economics for Energy Foundation.

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Whited, M., D. Bernhardt, R. Deitchman, C. Fuchsteiner, M. Kirby, M. Krueger, S. Locke, M. Mcmillen, H. Moussavi, T. Robinson, E. Schmitz, Z. Schuster, R. Smail, E. Stone, S. Van Egeren, H. Yoshida, Z. Zopp. 2009. *Implementing the Great Lakes Compact: Wisconsin Conservation and Efficiency Measures Report*. Department of Urban and Regional Planning, University of Wisconsin-Madison, Extension Report 2009-01.

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Whited, M. 2003. *Gender, Water, and Trade*. International Gender and Trade Network Washington, DC.

TESTIMONY AND COMMENTS

Nova Scotia Utility and Review Board (Matter No. M10832): Direct Testimony of Melissa Whited regarding the Town of Mahone Bay Electric Utility's application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. January 11, 2023.

Nova Scotia Utility and Review Board (Matter No. M10810): Direct Testimony of Melissa Whited regarding Riverport Electric Light Commission's application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. December 23, 2022.

Public Utilities Commission of Maine (Docket No. 2022-00152): Direct Testimony of Melissa Whited and Eric Borden regarding Central Maine Power Company's request for rate design increase and changes. On behalf of the Maine Office of the Public Advocate. December 2, 2022.

Illinois Commerce Commission (Docket No. 22-0067): Direct Testimony of Melissa Whited and Ben Havumaki regarding the performance incentive mechanisms and tracking metrics proposed by Commonwealth Edison Company and Ameren Illinois Company. April 6, 2022.

Maryland Public Service Commission (Case No. 9670): Direct testimony of Melissa Whited regarding Delmarva Power and Light's proposed rate designs. On behalf of Maryland Office of People's Counsel. December 2, 2021.

Nova Scotia Utility and Review Board (Matter No. M10176): Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.'s proposed Smart Grid Nova Scotia Solar Garden Rider. On behalf of Counsel to the Nova Scotia Utility and Review Board. August 18, 2021.

Public Service Commission of Florida (Docket No. 20210015-El): Direct Testimony of Melissa Whited regarding Florida Power and Light's petition for rate increase. On behalf of Vote Solar. June 21, 2021.

Colorado Public Utilities Commission (Proceeding No. 20AL-0432E): Answer testimony of Melissa Whited regarding inclining block rates. On behalf of Energy Outreach Colorado. March 8, 2021.

Maryland Public Service Commission (Case No. 9655): Direct and surrebuttal testimony of Melissa Whited regarding Pepco's proposed multi-year plan and performance incentive mechanisms. On behalf of Maryland Office of People's Counsel. March 3, 2021.

Nova Scotia Utility and Review Board (Matter No. M09777): Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.'s proposed time-varying pricing tariff application. On behalf of Counsel to the Nova Scotia Utility and Review Board. February 24, 2021.

Georgia Public Service Commission (Docket No. 42516): Direct testimony of Melissa Whited and Ben Havumaki regarding Georgia Power's proposal to increase the customer charge for residential customers. On behalf of the Sierra Club. October 17, 2019.

Maine Public Utilities Commission (Docket No. 2018-00171): Direct testimony of Melissa Whited regarding utility incentives for non-wires alternatives. On behalf of Maine Office of the Public Advocate. December 17, 2018.

Rhode Island Public Utilities Commission (Docket No. 4780): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Power Sector Transformation proposals. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 28, 2018.

Rhode Island Public Utilities Commission (Docket No. 4770): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's proposed performance incentive mechanisms, benefit-cost analyses, and request for recovery of costs for its Advanced Metering Functionality study and distributed energy resources enablement investments. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 6, 2018.

Rhode Island Public Utilities Commission (Docket No. 4783): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Advanced Metering Functionality Pilot. On behalf of the Rhode Island Division of Public Utilities and Carriers. February 22, 2018.

Virginia State Corporation Commission (Case No. PUR-2017-00044): Direct testimony of Melissa Whited regarding Rappahannock Electric Cooperative's proposed increases to fixed charges for residential customers and small business customers. On behalf of Sierra Club. September 19, 2017.

California Public Utilities Commission (Application 17-01-020, 17-01-021, and 17-01-022): Joint opening testimony with Max Baumhefner and Katherine Stainken on fast charging infrastructure and rates; joint opening testimony with Max Baumhefner and Joel Espino on medium and heavy-duty and fleet charging infrastructure and commercial EV rates; joint opening testimony with Max Baumhefner and Chris King on residential charging infrastructure and rates. Rebuttal testimony on public fast charging rate design, commercial EV rate design, and residential EV rate design. On behalf of Natural Resources Defense Council, the Greenlining Institute, Plug In America, the Coalition of California Utility Employees, Sierra Club, and the Environmental Defense Fund. July 25, August 1, August 7, and September 5, 2017.

New York Public Service Commission (Case 17-E-0238): Direct and rebuttal testimony of Tim Woolf and Melissa Whited regarding Earnings Adjustment Mechanisms proposed by National Grid. On behalf of Advanced Energy Economy Institute. August 25 and September 15, 2017.

Utah Public Service Commission (Docket No. 14-035-114): Direct testimony of Melissa Whited regarding PacifiCorp's proposed rates for customers with distributed generation. On behalf of Utah Clean Energy. June 8, 2017.

Texas Public Utilities Commission (SOAH Docket No. 473-17-1764, PUC Docket No. 46449): Cross-rebuttal testimony evaluating Southwestern Electric Power Company's proposed revisions to its

Distributed Renewable Generation tariff. On behalf of Sierra Club and Dr. Lawrence Brough. May 19, 2017.

Massachusetts Department of Public Utilities (Docket No. 17-05): Direct and surrebuttal testimony of Tim Woolf and Melissa Whited regarding performance-based regulation, the monthly minimum reliability contribution, storage pilots, and rate design in Eversource's petition for approval of rate increases and a performance-based ratemaking mechanism. On behalf of Sunrun and the Energy Freedom Coalition of America, LLC. April 28, 2017 and May 26, 2017.

Public Utilities Commission of Hawaii (Docket No. 2015-0170): Direct testimony regarding Hawaiian Electric Light Company's proposed performance incentive mechanisms. On behalf of the Division of Consumer Advocacy. April 28, 2017.

Massachusetts Department of Public Utilities (Docket No. 15-155): Joint direct and rebuttal testimony with T. Woolf regarding National Grid's rate design proposal. On behalf of Energy Freedom Coalition of America, LLC. March 18, 2016 and April 28, 2016.

Federal Energy Regulatory Commission (Docket No. EC13-93-000): Affidavit regarding potential market power resulting from the acquisition of Ameren generation by Dynegy. On behalf of Sierra Club. August 16, 2013.

Wisconsin Senate Committee on Clean Energy: Joint testimony with M. Grabow regarding the importance of clean transportation to Wisconsin's public health and economy. February 2010.

TESTIMONY ASSISTANCE

Colorado Public Utilities Commission (Proceeding No. 16AL-0048E): Answer testimony of Tim Woolf regarding Public Service Company of Colorado's rate design proposal. On behalf of Energy Outreach Colorado. June 6, 2016.

Nevada Public Utilities Commission (Docket Nos. 15-07041 and 15-07042): Direct testimony on NV Energy's application for approval of a cost of service study and net metering tariffs. On behalf of The Alliance for Solar Choice. October 27, 2015.

Missouri Public Service Commission (Case No. ER-2014-0370): Direct and surrebuttal testimony on the topic of Kansas City Power and Light's rate design proposal. On behalf of Sierra Club. April 16, 2015 and June 5, 2015.

Wisconsin Public Service Commission (Docket No. 05-UR-107): Direct and surrebuttal testimony of Rick Hornby regarding Wisconsin Electric Power Company rate case. On behalf of The Alliance for Solar Choice. August 28, 2014 and September 22, 2014.

Maine Public Utilities Commission (Docket No. 2013-00519): Direct testimony of Richard Hornby and Martin R. Cohen on GridSolar's smart grid coordinator petition. On behalf of the Maine Office of the Public Advocate. August 28, 2014.

Maine Public Utilities Commission (Docket No. 2013-00168): Direct and surrebuttal testimony of Tim Woolf regarding Central Maine Power's request for an alternative rate plan. December 12, 2013 and March 21, 2014.

Massachusetts Department of Public Utilities (Docket No. 14-04): Comments of Massachusetts Department of Energy Resources on investigation into time varying rates. On behalf of the Massachusetts Department of Energy Resources. March 10, 2014.

State of Nevada, Public Utilities Commission of Nevada (Docket No. 13-07021): Direct testimony of Frank Ackerman regarding the proposed merger of NV Energy, Inc. and MidAmerican Energy Holdings Company. On behalf of the Sierra Club. October 24, 2013.

PRESENTATIONS

Whited, M. 2024. "Benefits of Offshore Wind in New England" Webinar presentation sponsored by Sierra Club, June 24, 2024.

Whited, M. 2021. "Evolution of Net Metering in Hawaii." Presentation to the NARUC Winter Policy Summit. February 4.

Biewald, B., M. Whited. "Evaluating and Shaping the Impacts of EVs on Customers: Tools for Consumer Advocates." Presentation at the NASUCA Mid-Year Meeting, June 19, 2019.

Whited, M. 2019. "Performance Incentive Mechanisms." Presentation to the 2019 Pennsylvania Public Utility Law Conference, Harrisburg, PA. May 31.

Whited, M. 2018. "Smart Non-Residential Rate Design: Designing for the Future." Presentation to the NARUC Annual Meeting, Orlando, FL. November 11.

Whited, M. 2016. "Energy Policy for the Future: Trends and Overview." Presentation to the National Conference of State Legislators' Capitol Forum, Washington, DC, December 8.

Whited, M. 2016. "Ratemaking for the Future: Trends and Considerations." Presentation to the Midwest Governors' Association, St. Paul, MN, July 14.

Whited, M. 2016. "Performance Based Regulation." Presentation to the NARUC Rate Design Subcommittee. September 12.

Whited, M. 2016. "Demand Charges: Impacts and Alternatives (A Skeptic's View)." EUCI 2nd Annual Residential Demand Charges Summit, Phoenix, AZ, June 7.

Whited, M. 2016. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Wisconsin Workshop, Madison WI, March 29.

Whited, M., T. Woolf. 2016. "Caught in a Fix: The Problem with Fixed Charges for Electricity." Webinar presentation sponsored by Consumers Union, February.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Learning Lab on New Utility Business Models & the Electricity Market Structures of the Future, Boston, MA, July 28.

Whited, M. 2015. "Rate Design: Options for Addressing NEM Impacts." Presentation to the Utah Net Energy Metering Workgroup, Workshop 4, Salt Lake City, UT, July 8.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the e21 Initiative, St. Paul, MN, May 29.

Whited, M., F. Ackerman. 2013. "Water Constraints on Energy Production: Altering our Current Collision Course." Webinar presentation sponsored by Civil Society Institute, September 12.

Whited, M., G. Brown, K. Charipar. 2011. "Electricity Demand Response Programs and Potential in Wisconsin." Presentation to the Wisconsin Public Service Commission, April.

Whited, M. 2010. "Economic Impact of Irrigation Water Transfers in Uvalde County, Texas." Presentation at the Mid-Continent Regional Science Association's 41st Annual Conference/IMPLAN National User's 8th Biennial Conference in St. Louis, MO, June

Whited, M., M. Grabow, M. Hahn. 2009. "Valuing Bicycling's Economic and Health Impacts in Wisconsin." Presentation before the Governor's Coordinating Council on Bicycling, December.

Whited, M., D. Sheard. 2009. "Water Conservation Initiatives in Wisconsin." Presentation before the Waukesha County Water Conservation Coalition Municipal Water Conservation Subgroup, July.

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