

Caroline Palmer, Principal Associate

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PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Cambridge, MA. *Principal Associate*, June 2024 – present.

- Conduct analysis and provide expert witness and consulting services on behalf of public interest clients in regulatory proceedings, on topics including utility class cost of service, revenue allocation, advanced rate design, data center cost allocation and rate design, and distributed generation interconnection and planning.

Strategen Consulting, Oakland, CA. *Senior Manager*, 2024; *Manager*, 2023 - 2024; *Senior Consultant*, 2021 - 2022; *Consultant*, 2019 - 2021.

- Conducted analysis and provided expert witness and consulting services to state regulatory commissions, state consumer advocates, and non-profits to advance the public interest in regulatory decision-making around electricity service, pricing, and decarbonization.

Metropolitan Area Planning Council Boston, MA. *Clean Energy Fellow*, 2017.

- Provided technical assistance to Massachusetts local government on renewable energy technology and energy planning.

Fulbright Foundation Athens, Greece. *Fulbright Research Fellow*, 2015 – 2016.

- Designed and conducted original, independent research on renewable energy policymaking and implementation in the context of Greece's severe economic crisis

Meister Consultants Group (now Cadmus), Boston, MA. *Analyst*, 2014 – 2015.

- Performed research and writing for renewable energy policy design, analysis, and implementation.

EDUCATION

University of California, Berkley, CA

Master of Public Policy – Energy Policy, 2019

Georgetown University, Washington, DC

Bachelor of Science in Foreign Service – Science, Technology, and International Affairs, 2013

TESTIMONY

Nova Scotia Energy Board (M12451). Direct Testimony of Caroline Palmer regarding Application by Nova Scotia Power Incorporated for Approval of Certain Revisions to its Rates, Charges, and Regulations. On behalf of Counsel to Nova Scotia Energy Board. December 2, 2025. *Issues covered: cost-of-service study*

Massachusetts Department of Public Utilities (D.P.U. 25-85): Direct and Surrebuttal Testimony of Caroline Palmer regarding Petition of Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty for Approval of a General Increase in Base Distribution Rates for Gas Service and a Performance-Based Ratemaking Plan. On behalf of the Massachusetts Office of the Attorney General. October 17, 2025 and November 24, 2025. *Issues covered: cost-of-service study, residential rate design.*

Michigan Public Service Commission (U-21870). Direct Testimony of Caroline Palmer regarding Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief. On behalf of Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan, collectively “MNSC.” September 30, 2025. *Issues covered: cost-of-service study, economic development rate design.*

Missouri Public Service Commission (ET-2025-0184) Direct and Rebuttal Testimony of Caroline Palmer regarding Application of Union Electric Company d/b/a Ameren Missouri for Approval of New Modified Tariffs for Service to Large Load Customers. On behalf of Sierra Club. September 5, 2025 and November 3, 2025. *Issues covered: data center tariff design and cost allocation.*

Missouri Public Service Commission (ER-2024-0621) Direct and Surrebuttal Testimony of Caroline Palmer regarding Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in Its Missouri Service Area. On behalf of Consumers Council of Missouri. July 21, 2025 and September 17, 2025. *Issues covered: cost-of-service study, residential rate design.*

Michigan Public Service Commission (U-21859). Direct and Rebuttal Testimony of Caroline Palmer regarding Application of Consumers Energy Company for Ex Parte Approval of Certain Amendments to Rate GPD. On behalf of Michigan Environmental Council, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan, collectively “MNSC.” June 12, 2025 and July 9, 2025. *Issues covered: data center tariff design and cost allocation.*

Connecticut Public Utilities Regulatory Authority (24-10-04) Direct Testimony, Surrebuttal Testimony, and Cross-examination of Caroline Palmer regarding Application of The United Illuminating Company to Amend Its Rate Schedules. On behalf of The Office of Consumer Counsel. February 13, 2025, March 24, 2025, and May 6, 2025. *Issues covered: cost-of-service study, time-of-use rate design.*

New Hampshire Public Utilities Commission (DE 24-070) Direct Testimony and Cross-examination of Caroline Palmer regarding Public Service Company of New Hampshire d/b/a Eversource Energy Request

for Change in Distribution Rates. On behalf of the NH Office of Consumer Advocate. January 23, 2025 and June 4, 2025. *Issues covered: cost-of-service study, residential rate design.*

Massachusetts Department of Public Utilities (D.P.U. 24-195, 24-196, 24-197) Direct and Surrebuttal Testimonies of Caroline Palmer and Thanh Nguyen addressing the EV Infrastructure Program mid-term modification filings from the electric distribution companies. On behalf of The Massachusetts Office of the Attorney General. April 4, 2025 and May 27, 2025. *Issues covered: EV program design and budget.*

Missouri Public Service Commission (WR-2024-0320). Direct Testimony of Caroline Palmer regarding Missouri-American Water Company's Request for Authority to Implement a General Rate Increase for Water and Sewer Service. On behalf of Consumers Council of Missouri. December 20, 2024. *Issues covered: cost-of-service study, residential rate design.*

Missouri Public Service Commission (ER-2024-0319). Direct Testimonies and Surrebuttal Testimony of Caroline Palmer regarding Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service. On behalf of Consumers Council of Missouri. December 3, 2024, December 17, 2024, and February 14, 2025. *Issues covered: revenue requirement, cost-of-service study, residential rate design.*

Nova Scotia Utility and Review Board (M11874). Direct Testimony of Caroline Palmer regarding costs incurred to implement the Renewable to Retail market. On behalf of Counsel to Nova Scotia Utility and Review Board. November 1, 2024.

Maine Public Utilities Commission (Docket No. 2024-00137). Direct Testimony and Cross-examination of Caroline Palmer and Eric Borden regarding Stranded Cost Rate Design. On behalf of the Maine Office of the Public Advocate. October 1, 2024 and January 10, 2025.

New York Public Service Commission (Cases 24-E-0322 & 24-G-0323): Direct Testimony of Caroline Palmer, Melissa Whited, and Ben Havumaki regarding the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric and Gas Service. On behalf of the Utility Intervention Unit of the New York Department of State's Division of Consumer Protection. September 26, 2024.

Massachusetts Department of Public Utilities (D.P.U. 23-150): Direct Testimony, Surrebuttal Testimony, and Cross-examination of Caroline Palmer and Ron Nelson regarding Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, pursuant to G.L. c. 164, § 94 and 220 CMR 5.00, for Approval of a General Increase in Base Distribution Rates for Electric Service and a Performance-Based Ratemaking Plan. On behalf of the Massachusetts Office of the Attorney General. March 29, 2024, May 3, 2024, and May 20, 2024.

North Carolina Utilities Commission (Docket No. E-7, Sub 1276): Direct Testimony of Caroline Palmer regarding the Application of Duke Energy Carolinas, LLC, for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina and Performance-Based Regulation. On behalf of the North Carolina Attorney General's Office. July 19, 2023.

Oklahoma Corporation Commission (Case No. PUD 2022-000093.): Adoption of Direct Testimony and Cross-examination regarding the Application of Public Service Company of Oklahoma, for an adjustment in its rates and charges and the electric service rules, regulations, and conditions of service for electric service in the state of Oklahoma and to approve a formula-based rate proposal. On behalf of AARP. May 22, 2023.

Maine Public Utilities Commission (Case No. 2022-00152): Direct and Surrebuttal Testimony of Caroline Palmer, Nikhil Balakumar, and Ron Nelson regarding the Central Maine Power Company's request for Approval of a Rate Change - 307 (7/30/23). On behalf of the Maine Governor's Energy Office. December 2, 2022 and April 6, 2023.

Massachusetts Department of Public Utilities (D.P.U. 21-91): Direct Testimony and Cross-examination of Caroline Palmer and Ron Nelson regarding the Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Phase II Electric Vehicle Infrastructure Program and EV Demand Charge Alternative Proposal. On behalf of the Massachusetts Office of the Attorney General. January 5, 2022, and March 22, 2022.

Massachusetts Department of Public Utilities (D.P.U. 21-90): Direct Testimony and Cross-examination of Caroline Palmer and Ron Nelson regarding the Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of its Phase III EV Market Development Program and EV Demand Charge Alternative Proposal. On behalf of the Massachusetts Office of the Attorney General. January 5, 2022, and March 22, 2022.

Massachusetts Department of Public Utilities (D.P.U. 21-92): Direct Testimony and Cross-examination of Caroline Palmer and Ron Nelson regarding the Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its EV Infrastructure Program, EV Demand Charge Alternative Proposal, and Residential EV Time-of-Use Rate Proposal. On behalf of the Massachusetts Office of the Attorney General. January 5, 2022, and March 22, 2022.

PUBLICATIONS

Napoleon, A., C. Palmer, T. Nguyen, E. Carlson, A. Zeng. 2025. *Energy Affordability in Washington, DC*. Synapse Energy Economics for the Office of the People's Counsel for the District of Columbia.

Yuang, C., M. Whited, T. Nguyen, S. Schadler, R. Anderson, W. Dejeanlouis, C. Palmer, C. Mattioda, A. Glaser Schoff, S. Koester, J. Hittinger, P. Eash-Gates. 2024. *Utility Engagement Playbook for Industrial Customers: Addressing Power Sector Barriers to Electrification*. Synapse Energy Economics and World Wildlife Fund for Renewable Thermal Collaborative.

Palmer, C. 2019. *Using Low Carbon Fuel Standard Proceeds from EV Adoption to Improve the Efficiency of Electricity Rates*. Berkeley Public Policy Journal.

PRESENTATIONS

Palmer, C. 2025. Large Load Tariffs – Current Efforts to Minimize Risk to Consumers. NASUCA Mid-Year Meeting. Columbus, OH.

Palmer, C. 2022. Utility Transportation Electrification from a Consumer Advocate Perspective. NASUCA Mid-Year Meeting. Indianapolis, IN.

Palmer, C. 2017. Integration of renewable energy in Greek energy markets: A case study. 2nd HAEE International Conference. Athens, Greece.

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