By Electronic Mail, Courier & RESS Filing

November 14, 2011

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street,
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Request for Intervenor Status, Eligibility for an Award of Costs and Approval of Expert Witness
Renewed Regulatory Framework for Electricity
Board File Numbers: EB-2010-0377, EB-2010-0378, EB-2010-0379, EB-2011-0043 and EB-2011-0004

Willms & Shier Environmental Lawyers LLP (Willms & Shier) is legal counsel to Northwatch.

Northwatch is a public interest organization concerned with environmental protection and social development in northeastern Ontario. Founded in 1988 to provide a representative regional voice in environmental decision-making and to address regional concerns with respect to energy, waste, mining and forestry related activities and initiatives, Northwatch has a long-term and consistent interest in electricity planning in Ontario. In particular, Northwatch’s interests are with respect to electricity generation and transmission in northeastern Ontario, conservation and efficiency measures, and rates and rate structures. Northwatch is a coalition of community and district based environmental, social justice and social development organizations.

The purpose of this letter is to identify Northwatch’s interest in the renewed regulatory framework for electricity and to seek intervenor status, eligibility for any award of costs and approval for an expert witness.

Northwatch’s contact is Ms. Brennain Lloyd, coordinator for Northwatch. Ms. Lloyd’s contact information is as follows:
HOW NORTHWATCH IS OR MAY BE AFFECTED BY THE RENEWED REGULATORY FRAMEWORK FOR ELECTRICITY CONSULTATION PROCESS

Northwatch seeks to participate as an intervenor in the renewed regulatory framework for electricity consultation process. Northwatch’s interest is in all of the initiatives in the proposed framework and wishes to intervene in all of them. However, Northwatch is particularly interested in the issues raised in this proceeding as they relate to regional planning of electricity infrastructure (EB-2011-0043).

The residents and regions of northeastern Ontario will or may be affected by the renewed regulatory framework for electricity consultation process in as far as it relates to:

- how the electricity framework may evolve in support of and/or counter to Northwatch’s interests and objectives, and
- whether and/or how demand and supply of electricity will be balanced at a regional level.

DESCRIPTION OF NORTHWATCH

As indicated above, Northwatch was founded in 1988 as a regional coalition of individuals and organizations concerned with the protection of the environment and with social equity. Northwatch has a diverse membership which includes local and district-
based environmental groups, cottagers associations, naturalist clubs, church-based
Aboriginal support groups, women’s organizations, and local peace groups.

Individual members include those who self-identify as professionals, trappers, tourist
outfitters, paddlers, parents, educators, conservationists, hunters and fishers, and
environmentalists. The common thread throughout Northwatch’s membership is a deep
commitment to the region of northeastern Ontario and to the health, well-being and
sustainability of the human and natural communities throughout the region.

Northwatch’s membership base and area of interest is the land mass north of the French
River, comprised of the districts of Nipissing, Sudbury, Algoma, Manitoulin, Cochrane
and Timiskaming, and including the land area north of the road system, generally known
as the Hudson’s Bay lowlands.

Northwatch is well respected for its policy and research work, public education programs,
and its holistic approach to environmental and social planning and decision-making.
Through a membership that is geographically dispersed throughout the region and
through more than twenty years of work that is regionally based, Northwatch has an
extensive knowledge of northeastern Ontario and the diverse and interconnecting issues
of energy, natural resource and environmental management.

Northwatch has a history of involvement in energy policy. Recently, Northwatch has
actively participated as an intervenor and has been found eligible for an award of costs in
the following OEB proceedings:

- The Integrated Power System Plan (IPSP)
- The Transmission Connection Cost Responsibility Review (EB-2008-0003)
- Proposed Amendments to the Distribution System Code (EB-2009-0077)
- The Regulatory Treatment of Infrastructure Investment for Ontario's Electricity
Transmitters & Distribution (EB-2009-0152).

Northwatch has most recently engaged with the Ontario Power Authority (OPA) on the
current IPSP and provided input to the OPA on the need for regional electricity planning
in Ontario, particularly in the northeast region.

NATURE AND SCOPE OF NORTHWATCH’S INTENDED PARTICIPATION

The nature and scope of Northwatch’s participation will be that of an intervenor and will
include the following contributions to the review process:

- participation in the December 8, 2011 Information Session
participation in the February, 2012 Stakeholder Conference

written submissions on the issues identified at the Stakeholder Conference

retaining of an expert, Mr. Bill Marcus, of JBS Energy Inc. to review one or more of the Board Staff discussion papers and the three expert papers and provide an opinion based on the review.

JBS Energy is a consulting firm specializing in regulatory economics for energy consumers and producers.

William B. Marcus is Principal Economist of JBS Energy, Inc. He has 33 years of experience in analyzing electric and gas utilities. He has reviewed issues related to utility resource planning, cost-effectiveness of energy projects, design of energy efficiency programs, performance-based ratemaking, revenue requirements, rate of return, and cost allocation and rate design for a variety of consumer, environmental, and independent power clients. He has testified as an expert witness before approximately 40 regulatory bodies and courts in North America. Mr. Marcus received his undergraduate degree in economics from Harvard College and an M.A in economics from the University of Toronto. Before becoming a founding member of JBS in 1984, he worked for the Kennedy School of Government at Harvard and for the California Energy Commission. He has previously preparing a detailed analysis of the Demand-Supply Plan of Ontario Hydro filed before the Environmental Assessment Board in 1992 and has appeared before the OEB on Gas Integrated Resource Planning and several cases involving Ontario Hydro and various gas utilities.

Mr. Marcus’ CV is attached. He can be contact at: JBS Energy Inc, 311 D Street West, Sacramento CA 95605. Tel (916) 372 0534. Email: bill@jbsenergy.com

**GROUNDS FOR NORTHWATCH ELIGIBILITY FOR COSTS**

Northwatch intends to seek costs from the applicant in relation to its participation in this review. The Ontario Energy Board's “Practice Direction on Cost Awards”. Section 3 describes cost eligibility, and Section 4 describes the cost eligibility process.

3.03 A party in a Board process is eligible to apply for a cost award where the party:

(a) primarily represents the direct interests of consumers (e.g. ratepayers) in relation regulated services; (b) primarily represents a public interest relevant to the Board's mandate; or (c) is a person with an interest in land that is affected by the process.
Northwatch meets all three of the eligibility criteria, but as a public interest organization, its primary purpose - and its primary contribution to the stakeholder review process - is with respect to (b).

Northwatch’s primary purpose is to represent the public interest with respect to environmental protection and resource management matters in northeastern Ontario. However, as a coalition of interests which includes those represented by social organizations, Northwatch also has an interest and a relevant perspective with respect to consumer concerns, many of which are unique in northeastern Ontario, relative to a provincial or more urban context (ie. criteria a).

Northwatch represents the interests of the environment and of the residents of northeastern Ontario who identify and express environmental concerns; it is within the mandate of the Ontario Energy Board to consider such matters as the effect on the environment (ie. criteria b). Further, our members have an interest in the land that is or may be affected by the process (ie. criteria c). That interest may in some cases be a private interest, but in every case is also a public interest.

Northwatch will make a responsible, unique and beneficial contribution to the renewed regulatory framework for electricity proceeding.

As a not-for-profit organization, Northwatch’s participation in this proceeding is dependent on any cost awards it receives.

CO-OPERATION WITH OTHER GROUPS

Northwatch understands the importance of avoiding duplication of effort and any unnecessary differences of opinion on issues of mutual concern to other intervenors. Northwatch will work with the other intervenors to avoid repetition. Northwatch understands that a responsible intervention will add value and is deserving of costs.

Northwatch communicates regularly with other stakeholder groups on electricity related matters. As a coalition with a diverse network of members and associates, Northwatch’s experience and perspective is unique to northeastern Ontario, and as such would not be served by joining with other groups for this exercise. However, Northwatch will continue to communicate with other stakeholders and combine efforts where possible in order to bring efficiencies to the Ontario Energy Board’s renewed regulatory framework for electricity proceeding.

Contacts for the distribution list are as follows:

* Brennain Lloyd, coordinator for Northwatch, e-mail: northwatch@onlink.net

* Juli Abouchar, Counsel, Willms & Shier Environmental Lawyers, e-mail: jabouchar@willmsshier.com
Matt Gardner, Counsel, Willms & Shier Environmental Lawyers, e-mail: mgardner@willmsshier.com

Thank you for your consideration. We look forward to a positive response to this expression of interest and to participating in the renewed regulatory framework for electricity proceeding.

Yours truly,

[Signature]

Juli Abouchar
Partner, W+SEL
Certified as a Specialist in Environmental Law
by the Law Society of Upper Canada

cc: Brennain Lloyd, Northwatch
Document #: 474790
William B. Marcus
Principal Economist,
JBS Energy, Inc.

William B. Marcus has 32 years of experience in analyzing electric and gas utilities.

Mr. Marcus graduated from Harvard College with an A.B. magna cum laude in economics in 1974 and was elected to Phi Beta Kappa. In 1975, he received an M.A. in economics from the University of Toronto.

In July, 1984, Mr. Marcus became Principal Economist for JBS Energy, Inc. In this position, he is the company’s lead economist for utility issues.

Mr. Marcus is the co-author of a book on electric restructuring prepared for the National Association of Regulatory Utility Commissioners. He wrote a major report on Performance Based Ratemaking for the Energy Foundation.

Mr. Marcus has prepared testimony and formal comments submitted to the Federal Energy Regulatory Commission, the National Energy Board of Canada, the Bonneville Power Administration, the U.S. Bureau of Indian Affairs, U.S. District Court in San Diego, Nevada County Municipal Court; committees of the Nevada, Ontario and California legislatures and the Los Angeles City Council; the California Energy Commission (CEC), the Sacramento Municipal Utility District (SMUD), the Transmission Agency of Northern California, the State of Nevada’s Colorado River Commission, a hearing panel of the Alberta Beverage Container Management Board; two arbitration cases, environmental boards in Ontario, Manitoba, and Nova Scotia; and regulatory commissions in Alberta, Arizona, Arkansas, British Columbia, California, Colorado, Connecticut, District of Columbia, Hawaii, Iowa, Manitoba, Maryland, Massachusetts, Nebraska, Nevada, New Jersey, New Mexico, North Carolina, Northwest Territories, Nova Scotia, Ohio, Oklahoma, Ontario, Oregon, South Carolina, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, and Yukon. He testified on issues including utility restructuring, stranded costs, Performance-Based Ratemaking, resource planning, load forecasts, need for powerplants and transmission lines, environmental effects of electricity production, evaluation of conservation potential and programs, utility affiliate transactions, mergers, utility revenue requirements, avoided cost, and electric and gas cost of service and rate design.

From 1975 to 1978, Mr. Marcus was a research analyst at the Kennedy School of Government, Harvard University. He prepared public policy case studies on environmental and transportation issues, benefit-cost analysis, and urban policy and finance for use in classes and publication in the Kennedy School Case Series.

From July, 1978 through April, 1982, Mr. Marcus was an economist at the CEC, first in the energy development division and later as a senior economist in the CEC’s Executive Office. He prepared testimony on purchased power pricing and economic studies of transmission projects, renewable resources, and conservation programs, and managed interventions in utility rate cases.

From April, 1982, through June, 1984, he was principal economist at California Hydro Systems, Inc., an alternative energy consulting and development company. He prepared
financial analyses of projects, negotiated utility contracts, and provided consulting services on utility economics.

Mr. Marcus is currently the Chair of the Manufactured Home Fair Practices Commission for the City of Woodland, California. This Commission regulates space rents in the City’s mobile home parks. He has served on several other local government advisory committees, including a 1991-92 SMUD Rate Advisory Committee, which recommended cost allocation and rate design changes to the SMUD Board.
PUBLICATIONS


Author or co-author of eight cases published by the Kennedy School of Government, Harvard University, and the Inter-University Case Clearinghouse.
OTHER REPORTS AND PRESENTATIONS


W. Marcus, Review of Performance of Nuclear and Supercritical Coal Plants for Maryland’s Generating Unit Performance Program. For Maryland Office of People’s Counsel. August 1998.


W. Marcus, **Review of Performance of Nuclear and Supercritical Coal Plants for Maryland's Generating Unit Performance Program.** For Maryland Office of People's Counsel. May 1996.


TESTIMONY AND FORMAL COMMENTS


CPUC Application 10-11-009. Revenue Requirements for SCE's Catalina Island Water Utility. May 2011. For TURN.


Arkansas PSC Docket 10-052-U. Revenue Requirement, Cost of Service and Residential Rate Design for Empire District Electric Company (Empire). December 2010. For the Arkansas AG (case settled).


PUCN Docket 10-06001 et al. Marginal Cost, Revenue Allocation, and Residential Rate Design for Sierra. October 2010. For Nevada BCP.

CPUC Application 10-03-014. Marginal Cost, Revenue Allocation, and Residential Rate Design for Pacific Gas and Electric Company (PG&E). October 2010. For TURN. (case settled, except residential rate design)

AUC Application No. 1606230. Cost of Service and Rate Design for AltaGas Ltd.. September 2010. For the Alberta UCA. (joint testimony with R. Bruggeman; case settled).


CPUC Application 09-12-020. Policy and Revenue Requirements Issues in PG&E’s 2011 Test Year General Rate Case. May 2010. For TURN. (case settled after hearing)

CPUC App. 09-12-002. Choice of Investment Tax Credit versus Production Tax Credit for PG&E’s Proposal to Acquire the Manzana Wind Project. April 2010. For TURN.

Arkansas PSC Docket 10-008-U. Securitization of Ice Storm Costs for Entergy Arkansas, Inc. (EEAI). March 2010. For the Arkansas AG.


Arkansas PSC Docket 09-084-U. Formula Rate Plan, Revenue Requirement, Cost of Service, and Residential Rate Design for EEAI. February 2010. For the Arkansas AG. (case settled)


AUC Application No. 1605580. Irrigation Rate Design for Fortis Alberta, Inc. January 2010. For Alberta UCA.


AUC Application 1587092. Cost Allocation and Rate Design for Atco Gas Ltd.. July 2009. For the Alberta UCA. (joint with H. VanderVeen and R. Bruggeman; case settled)

CPUC Application 08-05-023. PG&E’s Distribution Reliability Improvement Program. July 2009. For TURN.

Arkansas PSC Docket 09-008-U. Construction Work in Progress in the Rate Base, Revenue Requirement, Cost of Service, and Residential Rate Design for SWEPCO. June 2009. For the Arkansas AG. (case settled)


AUC Application 1587092. Management Fee for Contributions in Aid of Construction for AltaLink Management. March 2009. For the Consumers’ Coalition of Alberta (CCA) and Public Institutional Consumers of Alberta (PICA).


Arkansas PSC Docket 08-103-U. Revenue Requirement, Cost of Service, and Residential Rate Design for OG&E. January 2009. For the Arkansas AG. (case settled)

CPUC App. 08-02-001 Phase 2. Cost of Service and Revenue Allocation for Southern California Gas Company (SoCal Gas). December 2008. For TURN. (case settled)


Arkansas PSC Docket 08-139-U Phase IIB. Extraordinary Storm Damage Recovery Request of EEAI. November 2007. For the Arkansas AG.
PUCT Docket 35717. Cost of Service and Rate Design for Oncor Delivery Services, Inc. For Texas OPUC. October 2008.

CPUC App. 08-03-002. Cost of Service and Class Revenue Allocation for SCE. October 2008. For TURN. (case settled)


PUCT Docket 35668. Interruptible Rates and Air Conditioner and Water Heater Cycling Programs of SPS. For Texas OPUC. September 2008. (case settled)


PUCN Docket 07-12005. Marginal Cost and Rate Design of Sierra. April 2008. For Nevada BCP.

Arkansas PSC Docket 06-152-U Phase IIB. Capacity Acquisition Rider for the Ouachita Plant of EAI. October 2007. For the Arkansas AG.


Arkansas PSC Docket 07-129-U. Annual Earnings Review Tariff for EAI. October 2007. For the Arkansas AG.

Arkansas PSC Docket 06-152-U Phase IIA. EAI’s Proposed Capacity Acquisition Rider. October 2007. For the Arkansas AG.


CPUC App. 07-01-041. Marginal Cost and Revenue Allocation for SDG&E. August 2007. For UCAN. (case settled)


Arkansas PSC Docket 06-161-U. Revenue Requirement and Cost of Service for Centerpoint Arkla. July 2007. For the Arkansas AG. (case settled)

CPUC App. 06-12-009/010. Revenue Requirements Issues for SoCal Gas and SDG&E. July 2007. For TURN (SoCal Gas) and UCAN (SDG&E). (SoCal Gas portion of case settled)


Alberta EUB. Application 1492697. Return Margin for Regulated Retail Gas Service provided by Direct Energy Regulated Services. April 2007. For the Alberta UCA.


Arkansas PSC Docket 06-101-U. Revenue Requirement, Cost of Service, and Residential Rate Design for EAI. February 2007. For the Arkansas AG.


CPUC App. 06-03-005. Marginal Cost and Class Revenue Allocation for PG&E. October. 2006. For TURN (case settled).

PUCN. Docket 06-06007. Special Contract to Extend Service from Nevada Power to MGM Mirage Project. October 2006. For Nevada BCP.

Arkansas PSC Docket 06-070-U. Revenue Requirement, Cost of Service, and Residential Rate Design for OG&E. October 2006. For the Arkansas AG. (case settled)


CPUC App. 06-04-012. Ratemaking and Performance Requirements for Two Proposed New PG&E Powerplants. August 2006. For TURN.


CPUC App. 05-12-005. Revenue Requirements for PG&E’s Electric Generation and Electric and Gas Distribution Activities. April. 2006. For TURN.

Alberta EUB. Application 1434992. Allocation of Transmission Costs of Fortis Alberta, Inc. to Customer Classes. April 2006. For REA/AAMDC.


PUCN. Docket 05-10003/10005. Electric and Gas Cost of Service and Residential Rate Design for Sierra. February 2006. For Nevada BCP.

CPUC App. 05-05-023. Marginal Cost and Revenue Allocation of SCE. January 2006. For TURN. (case settled)


CPUC App.05-06-028. Impact of Pending Municipal Annexation Proposal in Yolo County on PG&E’s AMI Program. January 2006 (deployment) and June 2005 (pre-deployment). For Yolo County and cities of Davis, West Sacramento, and Woodland.

CPUC App. 05-06-018. Revenue Requirements, Marginal Cost, Revenue Allocation, and Residential Rate Design for Sierra’s California Operations. November-December 2005. For TURN (two separate pieces of testimony; case settled)
Arkansas PSC Docket 05-111-P. AWG’s Proposed Weatherization Program. November 2005. For the Arkansas AG.


Arkansas PSC Docket 05-006-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AOG. August 2005. For the Arkansas AG.

Arkansas PSC Docket 04-176-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AWG. July 2005. For the Arkansas AG.

Arkansas PSC Docket 04-121-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Centerpoint Arktla. May 2005. For the Arkansas AG.

Maryland PSC Case No. 8990. Testimony Supporting Settlement on Interruptible Rate Design, Revenue Normalization Mechanism and Future Residential Rate Design for WGL. May 2005. For Maryland OPC.

CPUC App. 04-12-014. Revenue Requirements for SCE. May 2005. For TURN.


CPUC App. 04-03-021. Gas Marginal Cost and Residential Rate Design for PG&E. January 2005. For TURN. (rate design issues settled)

CPUC App. 04-02-026. Cost-Effectiveness Analysis of Scenarios for Southern California Edison Company’s (SCE’s) San Onofre Steam Generator Replacement Project. December 2004. For TURN.

Arkansas PSC Docket 04-100-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Empire. November 2004. For the Arkansas AG. (case settled)


Arkansas PSC Docket 01-041-U. EAI Request for Transition Cost Recovery. April 2004. For the Arkansas AG.

CPUC Apps. 02-12-027/02-12-028, Phase 2. Economic Evaluation of Performance Based Ratemaking (PBR) Framework for Sempra Energy Utilities. April 2004. For TURN.

PUCN Docket 03-12002. Marginal Cost and Rate Design for Sierra. March 2004. For Nevada BCP (case settled)

Arkansas PSC Docket 02-179-U. Gas Procurement Practices of AWG. March 2004. For the Arkansas AG.

City and County of San Francisco vs. Turlock Irrigation District, Non-Binding Arbitration (before Panelists Hanschen, O’Neill and Power). Regulatory Decisions that Led to the California Energy Crisis. March 2004. For the City and County of San Francisco. (case settled after appearance)

PUCN Docket 03-10001. Marginal Cost and Rate Design for NPC. January 2004. For Nevada BCP.

CPUC Rulemaking 01-10-024 (SDG&E Procurement Phase). Comparison of Costs for Palomar project and Otay Mesa, Mountainview, and Sempra DWR Contracts. January 2004. For TURN.

PUCN Dockets 03-6040 and 03-6041. Standby Rate Design for NPC and Sierra. November 2003. For Nevada BCP. (case settled)


CPUC Apps. 02-12-027/02-12-028. Revenue Requirement for SDG&E and Southern California Gas (SoCal Gas). September 2003. For TURN and UCAN.


Arkansas PSC Docket 02-227-U. Revenue Requirement, Cost of Service, and Residential Rate Design for AWG. May 2003. For the Arkansas AG.


CPUC Rulemaking 01-10-024. Renewable Portfolio Standard Implementation. April 2003. For TURN.


Arkansas PSC Docket 02-024-U. Revenue Requirements, Cost of Service, and Residential Rate Design for AOG. August 2002. For the Arkansas AG.


Alberta EUB Docket 1250392. Cost of Service for Aquila Networks Canada (ANCA). July 2002 For REA/AAMDC. (joint testimony with Arnie Reimer)

Maryland PSC Case No. 8920. Embedded and Marginal Cost of Service, and Analysis of Tariffed Service Charges for WGL. June 2002. For Maryland OPC. (case settled)


CPUC App. 00-10-045 et al. Ratemaking for Recovery of AB 265 Balances from SDG&E Customers. May, 2002. For UCAN.

Arkansas PSC Docket 01-243-U. Revenue Requirement, Cost of Service, and Residential Rate Design for Reliant Arkla Gas. May 2002. For the Arkansas AG. (case settled)
PUCN Docket 01-11030. Cost of Service and Rate Design for Sierra. March 2002. For Nevada BCP.

Alberta EUB Docket 1250392. Business Risk of ANCA. March 2002. For the FIRM Group. (this part of case settled)


PUCN Docket 01-10001. Cost of Service and Rate Design for NPC. January 2002. For Nevada BCP.

Arkansas PSC Docket 01-184U. Ratemaking for Ice Storm Damage for Entergy Arkansas, Inc., December 2001. For the Arkansas AG. (case settled)


PUCN Docket 01-7023. Revenue Requirement, Cost of Service, and Rate Design of Southwest Gas. November 2001. For Nevada AFL-CIO. (revenue requirements settled)

PUCN Docket 01-4041. Southwest Gas’ Rules for Switching between Transportation and Sales Service. October 2001. For Nevada BCP.

Arkansas PSC Docket 00-190-U (second phase). Consumer Impacts of Electric Utility Restructuring. September 2001. For the Arkansas AG.

CPUC App. 00-11-038 et al. Department of Water Resources’ Revenue Requirement for Service to Utility Customers. August 2001. For TURN (formal comment)


Arkansas PSC. Rate Unbundling testimony in 2001 for four co-ops and three investor-owned utilities, where cases were settled without hearing. January-June 2001. For the Arkansas AG. Details available on request.

CPUC App. 00-11-038 et al. Tiered Rate Design for Emergency Rate Surcharge. April 2001. For TURN.


CPUC App. 00-07-001. Marginal Cost and Revenue Allocation for Sierra’s California System. February 2001. For TURN. (case settled)

CPUC App. 00-11-038 et al. Utility Financial Issues Related to Emergency Rate Relief. February 2001. For TURN.

CPUC App. 00-11-038 et al. Rate Design for Emergency Rate Relief and Ratemaking for Diablo Canyon Nuclear Plant. December 2000. For TURN.

Arkansas PSC. Rate unbundling testimony for 12 cooperatives where cases settled before hearing. (Cases not settled listed below.) For Arkansas AG. January-December 2000. Details available on request.


Alberta EUB. Docket 2000257. Return Margin and Marketing Expenses under Epcor’s Regulated Retail Rate Obligation Tariff. October 2000. For the FIRM Group. (case settled)

Alberta EUB Docket 2000136. Cost of Service and Rate Design for Atco Electric Distribution Service. October 2000. For REA/AAMDC.
Alberta EUB Docket 2000258. Testimony on UNCA Distribution Performance-Based Ratemaking (PBR) Proposal. (1) Economic Aspects (Indexing and Sharing). (2) Business Risk of Distribution Wires Business (also filed in Docket 2000136), and (3) Cost of Service. October 2000. For FIRM Group, except cost of service for REA/AAMDCE. (case settled)

Arkansas PSC Docket 99-263-U. Rate Unbundling for Southwest Arkansas Electric Cooperative Corporation (ECC). October 2000. For the Arkansas AG. (three-party settlement opposed by industrial intervenor)

CPUC App. 99-03-014. PG&E’s Marginal Electric Distribution Cost, Revenue Allocation, and Rate Design. September 2000. For TURN. (case dismissed due to energy crisis)

Arkansas PSC Docket 00-190-U. Consumer Impacts of Electric Utility Restructuring. September 2000. For the Arkansas AG.

CPUC App. 00-04-002. PG&E’s Gas Marginal Costs. September 2000. For TURN.


Arkansas PSC Docket 99-249-U. Rate Unbundling for EAI. July 2000. For the Arkansas AG. (settled except rate design)


Alberta EUB. Ratemaking for Investment Credits for TransAlta’s Industrial Customers. June 2000. For the FIRM Group. (Joint testimony with J. Nahigian)


CPUC App. 91-11-024 (1999 Rate Design Window). Electric Marginal Cost and Rate Design of SDG&E. March 2000. For UCAN.


Arkansas PSC. Docket 99-238-U. Unbundled Rates for the Ouachita Electric Cooperative Corp. December 1999. For the Arkansas AG. (case settled)

PUCN Docket 99-4005 Phase 2. Unbundled Distribution Revenue Requirement, Marginal Cost and Rate Design of NPC. November 1999. For Nevada BCP.

Maryland PSC. Case No. 8820. Affiliate Transaction Rules. October 1999. For Maryland OPC. (formal comments)

PUCN. Docket 99-4001 Phase 2. Unbundled Distribution Revenue Requirement, Marginal Costs and Rate Design of Sierra. October 1999. For Nevada BCP.

Alberta EUB. Review of Power Purchase Agreements developed by the Independent Assessment Team. Need for Sharing or Reopeners in 20-Year Indexed Generation Contracts. September 1999. For the Consortium (of over 10 Alberta consumer groups and municipalities). (Joint Testimony with Mark Drazen)


CPUC App. 98-10-031. Marginal Cost and Rate Design for SoCal Gas and Electric Generation Rate Policy for Sempa Energy Gas Utilities. March 1999. For TURN and UCAN.


PUCN Docket No. 98-9038 and 98-8034. Metering and Billing as Potentially Competitive Services for NPC and Sierra. September, 1998. For Nevada BCP. (identical testimony filed in each docket)


CPUC App. 97-04-012. Transfer of the El Dorado Hydro Project from PG&E to the El Dorado Irrigation District. For El Dorado Irrigation District.

CPUC App. 96-12-009 et al. Revenue Cycle Service Unbundling. April, 1998. For TURN and UCAN.


PUCN. Dockets 97-11018 and 97-11028. Cost Unbundling of NPC and Sierra. February 1998 and December 1997. For Nevada BCP.


CPUC App. 96-08-001 et al. Competitive Transition Charges for the California Utilities. May, 1997. For TURN and UCAN.


CPUC App. 96-12-009. Unbundling Rates for the California Utilities. February 1997. For TURN and UCAN.


CPUC App. 96-03-054. Ratemaking for PG&E’s Diablo Canyon Nuclear Plant. September 1996. For TURN.

CEC Docket 95-ER-96. Rate Design Issues in Electric Restructuring. August 1996. For TURN.

CPUC App. 96-02-056. Ratemaking for SCE Share of the Palo Verde Nuclear Plant. August 1996. For TURN.


CPUC App. 96-03-031. Marginal Cost and Residential Rate Design of SoCal Gas. July 1996. For TURN.


CPUC App. 94-12-005 Phase 2. Marginal Cost, Revenue Allocation, and Residential Rate Design of PG&E. December 1995. For TURN.


CPUC App. 93-12-025. Marginal Cost, Revenue Allocation, and Rate Design for SCE. June 1995. For TURN.


CPUC App. 94-11-015. Gas Load Forecast and Marginal Cost of PG&E. June 1995. For TURN.


CPUC App. 94-12-005. Revenue Requirement Issues for PG&E. May 1995. For TURN.

CPUC App. 94-12-005. PG&E’s Customer Service, Phone Center and Disaster Planning. April 1995. For TURN.


CPUC App. 93-12-029. Evaluation of the Proposed Settlement of SCE’s 1995 Test Year Rate Case. February, 1995. For TURN.


Alberta PUB. APL Phase II GRA. Evaluation of APL’s Cost of Service Study. September, 1994. For REA/AAMDC.


Hawaii PUC. Docket No. 94-0079. Avoided Cost for HELCO and Price Offer Proposed by Enserch Development Corp (EDC) for Combined Cycle Cogeneration. September, 1994. For EDC.


OEB Docket HR 22. Integrated Resource Planning at Ontario Hydro; Backup Power and Experimental Rate Design. May-June 1994. For IPPSO.

CPUC App. 93-12-025. SCE’s Revenue Requirements. April, 1994. For TURN.

CPUC App. 93-12-025. SCE’s Demand-Side Management Programs. April, 1994. For DGS.


New Mexico PSC Case No. 2426. Cost of Service, Residential Demand Charges and Rate Design for Otero County Electric Co-operative. June, 1992. For the Alto Group of residential customers. (case settled)


CPUC App. 91-11-036. Marginal Cost for PG&E. April, 1992. For TURN.


CPUC App. 88-12-005. Residential Rate Design for PG&E. February, 1992. For TURN.

CEC Docket 90-ER-92. Availability of Northwest and Southwest Power to California; Nuclear Plant Performance. (principal author with J. Nahigian) For IEP.

CPUC App. 91-09-059. Revenue Allocation and Residential Rate Design for SDG&E. January, 1992. For UCAN. (case settled)


CPUC App. 90-12-018. Revenue Allocation and Residential and Interruptible Rate Design for SCE. October, 1991. For TURN.


CPUC App. 90-12-018. Marginal Cost, Demand-Side Management, Research and Development and Results of Operations for SCE. April, 1991. For TURN.

CPUC App. 88-12-005. Residential Electric Rate Design for PG&E. January, 1991. For TURN.


CPUC App. 90-10-003. SDG&E Fuel Budget and Revenue Allocation. December, 1990. For UCAN. (case settled)


Alberta PUB. TAU 1988-1990 GRA Phase II. Variable Aluminum Smelter Rates; Energy Conservation Policy; Other Cost of Service and Rate Design Issues. May-June, 1990. For REA/AAMDC.

Alberta PUB. APL 1989-1990 GRA Phase II. Cost of Service and Rate Design. May 1990. For REA/AAMDC.

CPUC App. 88-12-035. Savings from the SCE-SDG&E Merger and Spread of Savings to Customer Classes. April, 1990. For UCAN.

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