
EXETER

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REF: 171002

November 6, 2017

Ms. Kim Trosclair
Louisiana Public Service Commission
Office of General Counsel
602 North Fifth Street, 12th Floor
Galvez Building
P.O. Box 91154
Baton Rouge, LA 70802

Re: Concordia Electric Cooperative
Application for Approval of an Updated Advanced Metering Program

Dear Ms. Trosclair:

Exeter Associates, Inc. (Exeter) is pleased to submit this proposal to assist the Staff of the Louisiana Public Service Commission (LPSC or Commission) in reviewing the September 7, 2017 request of Concordia Electric Cooperative (Concordia or Company) to evaluate the prudence and consideration of cost recovery associated with the Company's advanced metering system (AMS) investments.

Background

Concordia is a rural electric cooperative serving approximately 13,000 retail customers in the Parishes of Concordia, Catahoula, LaSalle, Rapides, and Grant. Concordia recently initiated a process through which the utility is replacing the current stock of TS-1 meters first installed nearly 25 years ago. Concordia had no choice but to retire the current metering stock, as the meter technologies and services were no longer supported by their meter vendor. Concordia selected its next generation metering components and technologies in 2013, but failed to seek approval of its system from the LPSC as is required by Commission Order R-29213 issued in 2009. A determination of prudence is required prior to cost recovery for advanced metering systems (AMS's). Subsequently, Concordia is retroactively seeking certification from the LPSC that its decision to begin installations of its AMS in 2014 was prudent. It is important to note

that Concordia does not intend, at this time, to specifically seek to recover the costs associated with implementation of the upgrade to its AMS. The implementation of Concordia's AMS did not require any issuance of debt nor additional revenue from its members.

Scope of Assistance

Exeter proposes to review and evaluate the Concordia filing to ensure that the intent of Commission Order R-29213 was met and that the Company's investment in its AMS was cost-effective. Issues for consideration include the compatibility of the new system with back office, meter and data management, and billing systems; and the process through which the technology was selected. Exeter will seek to understand whether or not the Company conducted a fair and thorough evaluation of the metering technologies available at the time, including the cost-effectiveness of competing technology solutions.

Plan of Action

Exeter proposes to provide our assistance by performing the following tasks:

- Detailed review of Concordia filings;
- Draft discovery and analysis of responses;
- Prepare an initial memo-report identifying findings and recommendations;
- Participate in formal status conferences, pre-trial conferences, and hearings, as needed;
- Participate in informal conference calls, meetings, and conferences with the LPSC and its Staff;
- Prepare prefiled direct and rebuttal testimony in support of Staff's recommendations;
- Attendance at certification hearing(s), as needed; and
- Assist in the drafting of applicable briefs, and orders of the LPSC.

Exeter will assist Staff in the above necessary actions through to the issuance of the final Commission Order. Despite the timeline described under section II. Period of Representation in the RFP, Exeter anticipates the time period required for completion of this proceeding would be three to four months.

Qualifications

Exeter is well-qualified to provide the assistance that the Commission requires. Exeter has extensive experience addressing utility regulatory matters before the LPSC, as well as other state and federal regulatory agencies. The firm's experience in work before the LPSC includes extensive work in analyzing the operations, books, and records of utility companies and providing expert testimony on all aspects of utility regulation and ratemaking. Exeter has also assisted Commission Staff and Consumer Advocates with the review of utility advanced metering system investments in Pennsylvania and Maine. The issues addressed in this work have included:

- Evaluation of advanced metering systems and technologies, including power line carrier, radio frequency mesh and open platform communication options;
- Analysis of cost-benefits models and assumptions associated with advanced metering systems and energy efficiency and demand response programs;
- Evaluation of "smart meter" consumer programs and gateway technologies;
- Consideration of safety and privacy issues associated with "smart meter" communication protocols;
- Evaluation of just and reasonable costs and prudent investments associated with providing reliable and quality service;
- Cost recovery and rate design related to cost recovery of advanced metering systems;
- Appropriate accounting standards and practices for utilities, public utility accounting, and generally accepted accounting standards;
- Appropriate ratemaking adjustments to utility accounting records;
- Recoverable expenses for ratemaking purposes; and
- Costs passed through a Formula Rate Plan (FRP) that are considered reasonable and prudent, and appropriate and/or eligible for recovery pursuant to commission orders, which are necessary for the provision of electric service and which have or will produce just and reasonable rates.

Exeter is especially well-suited to conduct this investigation because of its directly relevant Louisiana experience. Over the past 35 years, Exeter has worked for the Commission on numerous regulatory proceedings dealing with electric utility matters and numerous proceedings for a variety of Louisiana investor-owned utilities and rural electric cooperatives. Some of the directly relevant projects that Exeter has undertaken for the Commission include:

- Assistance with SWEPCO's purchases of energy and capacity from wind energy projects; Docket Nos. U-32095 and U-32814.
- Investigation of Cleco's fuel adjustment filings for the years 2003 through 2008.
- Investigation of Cleco's resource planning, procurement practices, and incurred fuel costs for the period January through October 2005 (initiated by the Commission as a result of the effect of Hurricanes Katrina and Rita on the fuel and purchased power cost of Louisiana electric utilities).
- Review of Cleco's application for Commission certification of the acquisition of the Coughlin Power Station from its affiliate, Cleco Evangeline, LLC.
- Investigation into whether Trans Louisiana Gas Company (TransLa) and Louisiana Intrastate Gas Company included inappropriate or imprudent costs in their purchased gas cost recovery mechanisms from 1981 through 1994.
- Review of the Rate Stabilization Pilot Program of TransLa for the 2004-05 through 2006-07 winter seasons.
- Audit of the purchased gas cost adjustment (PGA) filings of TransLa and Louisiana Gas Services for the period April 2012 through March 2014 (Docket No. U-33480).

In addition to our extensive work with the LPSC Staff, the following projects offer Exeter's experience directly relevant to the prudence review and certification of Concordia's smart meter system.

- Review of Duquesne Light Company's Smart Meter Technology Procurement and Installation Plans (2009, 2012, 2015).
- Review of PPL's Electric Utilities' Initial Smart Meter Technology Procurement and Installation Plan in 2009 and PPL's Final Smart Meter Technology Procurement and Installation Plan (2014).

- Review of PECO Energy Company's petition for Approval of its Smart Meter Universal Deployment Plan (2009).

Proposed Team

We propose that this project be conducted under the direction of Christina Mudd, a Principal at Exeter. Ms. Mudd has experience with electric utility matters in a number of jurisdictions, including work on advanced metering and energy efficiency dockets in Pennsylvania, Maine, and Arkansas. Ms. Mudd will coordinate with Jerome Mierzwa, also a Principal at Exeter, and Matthew Kahal, a consultant to Exeter, as needed to provide additional expertise specific to utility issues and practices in Louisiana. Ms. Mudd will be assisted by Shawn Kelly, a Senior Analyst at Exeter, and Stacy Sherwood, an Economist at Exeter. Both Ms. Mudd and Ms. Sherwood have previously participated in the review of utility smart meter programs on behalf of state regulatory commission staffs or consumer advocates as is evident in the attached resumes. Specifically, Ms. Mudd led Exeter's work in Duquesne Light Company's Smart Meter Technology Procurement and Installation Plans in 2009 and 2012. Ms. Mudd also participated in the review of PPL's Initial Smart Meter Technology Procurement and Installation Plan in 2009 in PUC Docket No. M-2009-2123945; PPL's Final Smart Meter Technology Procurement and Installation Plan in 2014 in PUC Docket No. M-2014-2430781; and the Petition of PECO Energy Company for Approval of its Smart Meter Universal Deployment Plan in PUC Docket No. M-2009-2123944. Ms. Mudd also evaluated the cost-effectiveness of proposed energy efficiency and conservation programs and provided testimony in PUC Docket No. M-2012-2333992, Petition of PECO Energy Company for approval of its Act 129 Phase II Energy Efficiency and Conservation Plan; PUC Docket No. M-2015-2515642, Petition of PPL Electric Utilities Corporation for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; and Docket No. M-2015-2515375, Petition of Duquesne Light Company for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan. Most recently, Ms. Mudd has been working with the Arkansas Office of the Attorney General in providing ongoing assistance and review of the utility Energy Efficiency Plans for electric and natural gas utilities, participating on behalf of the Arkansas Attorney General in a collaborative working group.

Mr. Kelly recently joined Exeter after 14 years in a variety of roles related to utility regulatory policy. Mr. Kelly's most recent position was the Director of Energy Efficiency for Vectren Corporation. In this role, Mr. Kelly was responsible for energy savings and demand response programs in Vectren's gas and electric service territory in Indiana and its gas service territory in Ohio. He led his team's administration of cost/benefit testing, evaluation, measurement, and verification studies, and program planning. He also oversaw the transition to a new residential program implementer and led negotiations for a major expansion of the online

energy audit platform. Mr. Kelly helped launch a new demand response smart thermostat pilot including marketing, enrollment, and installation. Prior to that role, as the Director of Regulatory Affairs, Mr. Kelly was responsible for regulatory policy and research, tariff, and ratemaking matters. He also provided expert witness testimony on ratemaking matters in a variety of cases, including cost recovery of energy efficiency programs.

While at Exeter, Ms. Sherwood has testified regarding the smart meter installation plan in Pennsylvania PUC Docket No. P-2015-2497267, Petition of Duquesne Light Company for approval of its Smart Meter Procurement and Installation Plan. Prior to joining Exeter, Ms. Sherwood worked for six years with the Maryland PSC reviewing advanced metering plans for Maryland's investor owned utilities: Baltimore Gas & Electric and Potomac Electric Power Company; as well as reviewing the advanced metering plans of Southern Maryland Electric Cooperative. Ms. Sherwood has also filed testimony in the following cases before the Pennsylvania PUC: Docket No. M-2015-2515642, Petition of PPL Electric Utilities Corporation for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; Docket No. M-2015-2515375, Petition of Duquesne Light Company for approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; and Docket No. M-2015-2477174, Petition of UGI Utilities, Inc. for approval of its Phase II Energy Efficiency and Conservation Plan. Most recently, Ms. Sherwood has been working with the Pennsylvania OCA and Arkansas Office of Attorney General in providing ongoing assistance and review of the utility Energy Efficiency Plans and its collaborative working group.

Ms. Mudd, Mr. Kelly, and Ms. Sherwood will review the technical aspects and cost-effectiveness of Concordia's AMS program with the requirements outlined in the Commission's AMS General Order dated September 22, 2009 in Docket Nos. R-29213 and R-292130. In addition, the proposed team members will ensure that any proposed cost recovery is in compliance with Concordia's FRP adopted in Order No. U-33779 and General Order No. U-21497 dated November 6, 1997. Other members of Exeter's staff will also be available to assist, if necessary.

Detailed resumes for Exeter's key personnel not already on file with the Commission are included as Attachment B to this proposal. Exeter would be pleased to provide additional copies of the complete resumes of our key project team members or any other additional information the Commission may find helpful.

Cost Proposal

Exeter proposes to provide the assistance described above for a budget not to exceed \$15,800 for professional services, plus direct expenses not to exceed \$1,200. Exeter's budget

estimate includes the costs associated with a one-person trip to Louisiana for one day of hearings/conferences. Exeter will bill for professional services at our standard hourly billing rates, which range from \$75 per hour for research assistants to \$215 for principals. The billing rate for Ms. Mudd is \$185 per hour and the rates for Mr. Kelly and Ms. Sherwood are \$155 and \$110, respectively. Direct expenses will be billed at State-authorized rates as specified in the Travel Policies and Procedures Memorandum issued by the State of Louisiana, Division of Administration in effect at the time such expenses are incurred.

Conflict of Interest

Please note that Exeter has no business relationship with Concordia or any of its affiliates, nor have we ever had such a relationship. We also have no business relationship with any advanced meter providers, such as L&G. Thus, we have no conflict of interest that could impair or restrict our ability to provide assistance and objective advice to Staff.

If you have any questions of either a technical or contractual nature, please do not hesitate to call. We look forward to again being of service to the Commission and the ratepayers of Louisiana.

Very truly yours,

Christina R. Mudd
Vice President

CRM/ccc
Enclosure

ATTACHMENT A

EXETER ASSOCIATES, INC.

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SUITE 300
COLUMBIA, MARYLAND 21044**

CORPORATE QUALIFICATIONS

EXETER ASSOCIATES, INC. CORPORATE QUALIFICATIONS -- GENERAL

Exeter Associates, Inc. provides economic and financial consulting services in the areas of public utility regulation, energy, and antitrust economics. The firm maintains the highest standards in the application of economic and financial analysis to both quantitative and policy issues in the electric, gas, and other industries.

Exeter Associates, Inc. is distinguished by the breadth of experience and expertise of its senior professionals. Each holds an advanced degree in economics or a related field with extensive experience in his or her area of expertise, and each is a recognized expert in one or more of the areas of analysis and research shown below.

Public Utility Regulation (Electric, Gas, and Water/Wastewater)

- | | |
|---|--|
| < <i>Alternative regulatory structures</i> | < <i>Structural separation remedies</i> |
| < <i>Local competition</i> | < <i>Rate structure and rate design</i> |
| < <i>Industry restructuring</i> | < <i>Marginal costs and rates</i> |
| < <i>Privatization</i> | < <i>Rate of return</i> |
| < <i>Wholesale/retail wheeling</i> | < <i>Affiliate company relationships</i> |
| < <i>Mergers and acquisitions</i> | < <i>Revenue requirements</i> |
| < <i>Costing methodologies</i> | < <i>Utility financial condition</i> |
| < <i>Imputation standards/non-accounting safeguards</i> | < <i>Utility productivity studies</i> |
| | < <i>Depreciation</i> |

Econometric and Energy Modeling

- | | |
|------------------------------------|--|
| < <i>Demand and cost analysis</i> | < <i>Conservation and load management analysis</i> |
| < <i>Energy supply forecasting</i> | < <i>Economic analysis of environmental policies</i> |
| < <i>Load forecasting</i> | |

Industry Analysis

- < *Electric utilities*
- < *Water/sewer utilities*
- < *Oil and natural gas*

Cost/Benefit Analysis

Life-Cycle Cost Analysis

Financial Modeling and Analysis

Evaluation/Acquisition of Alternative Utility Supplies

ELECTRICITY

Exeter staff has been continuously involved in electric utility industry regulatory issues since the Company began operating in 1981, and the experience of its senior staff predates the formation of the Company. Exeter has provided expert witness testimony in hundreds of regulatory proceedings before state and federal regulatory commissions. This testimony has been on behalf of commission staffs, consumer advocates, and federal and state government clients. In addition, Exeter personnel have provided consulting and prepared reports/studies addressing broad policy issues facing particular states and industry-wide regulatory concerns. These testimonies and studies have involved such recent issues as industry restructuring, wholesale and retail open access, privatization of utility systems, stranded costs, contract evaluation/negotiation, and the development or evaluation of performance-based mechanisms (alternative forms of regulation) for electric utilities. Most recently, Exeter has also examined and provided testimony on renewable energy, energy conservation, demand response, procurement of default electricity supply service, and construction and siting of power plants.

Exeter staff has extensive experience in providing expert testimony and consulting on revenue requirements, rate of return, load forecasting, demand side management, depreciation, cost of service, prudence, rate design, fuel costs, purchase power costs, competition (both wholesale and retail), utility resource planning, cogeneration analysis and merger issues.

NATURAL GAS

Exeter Associates has been extensively involved in natural gas regulatory issues since the mid-1970's. After the adoption of Federal Energy Regulatory Commission (FERC) Order No. 636 and subsequent unbundling of interstate pipeline service in 1993, local gas distribution companies (LDCs) have become entirely responsible for the gas procurement function, a responsibility primarily borne by interstate pipelines prior to adoption of FERC Order No. 636. Exeter's engagements have included evaluation of LDC gas procurement practices and policies in the post-Order No. 636 environment on behalf of public utility commission (PUC) staffs and consumer advocates. Exeter has provided expert witness assistance to PUC staffs and consumer advocates in numerous regulatory proceedings before state and federal regulatory authorities addressing revenue requirements, cost allocation and rate design issues. Exeter professionals have advised state and federal clients concerning issues related to natural gas industry restructuring. This includes addressing issues such as performance-based gas procurement programs, stranded costs, unbundling of LDC services, and new regulations to promote competition under conditions of an evolving market structure. Exeter has also assisted clients in the direct procurement of natural gas supplies and contract negotiations in the continually evolving competitive gas acquisition markets.

WATER/WASTEWATER

Exeter Associates' personnel have extensive experience in designing water/wastewater rates, performing cost allocation studies, evaluating revenue requirements, and addressing other aspects of water and wastewater regulation. Because of the substantial capital improvements required by water utilities to comply with the quality standards of the Safe Drinking Water Act (SDWA) and its amendments, significant increases in water rates are often required. Exeter has extensive experience in addressing the allocation and recovery of SDWA-related costs.

In addition to the staff's providing expert testimony in numerous regulatory proceedings throughout the U.S. on behalf of state and federal government clients, Exeter personnel have assisted clients in negotiations for water supply, rates, service characteristics, and billing arrangements. In addition to these issues, Exeter personnel have addressed the adequacy of infrastructure, privatization of federally-owned water treatment and storage facilities and water distribution systems, and issues related to fire protection.

EXETER ASSOCIATES, INC. RECENT CLIENTS

Exeter Associates' professional staff members have served a broad range of client organizations including public service commissions, consumer advocates, government agencies and private firms. Recent clients include:

Arkansas Public Service Commission	National Nuclear Security Administration
Brookhaven National Laboratory	National Renewable Energy Laboratory
Center for Resource Solutions	New Hampshire Office of Consumer Advocate
Colorado River Commission of Nevada	Northrop Grumman
Community Legal Services, Inc.	Office of the Ohio Consumers' Counsel
Defense Logistics Agency Energy	Pennsylvania Office of Attorney General
Delaware Division of the Public Advocate	Pennsylvania Office of Consumer Advocate
Delaware Public Service Commission	Public Utilities Commission of Ohio
Fermi National Accelerator Laboratory	Regulatory Assistance Project
General Electric	Rhode Island Division of Public Utilities & Carriers
General Services Administration	SLAC National Accelerator Laboratory
Hawaii Public Utilities Commission	Strategic Petroleum Reserve
Illinois Citizens Utility Board	Sustainable Energy Advantage
Imperial Irrigation District	Tennessee Attorney General – Consumer Advocate and Protection Division
Indiana Office of Utility Consumer Counselor	Tennessee Regulatory Authority
Lawrence Berkeley National Laboratory	Township of Bedminster, New Jersey
Lawrence Livermore National Laboratory	U.S. Air Force – Air Force Civil Engineer Center
Louisiana Public Service Commission	U.S. Army – Commercial Utilities Program, U.S. Army Corps of Engineers
Maine Office of the Public Advocate	U.S. Department of Defense
Maine Public Utilities Commission	U.S. Department of Energy
Maryland Department of the Environment	Utah Office of Consumer Services
Maryland Energy Administration	The Utility Reform Network
Maryland Office of People's Counsel	Western Area Power Administration – Desert Southwest Region
Maryland Power Plant Research Program	Western Interstate Energy Board
Maryland Public Service Commission	
Massachusetts Attorney General – Office of Ratepayer Advocacy	
Midwest Renewable Energy Tracking System	
National Association of Regulatory Utility Commissioners	

EXETER ASSOCIATES, INC. KEY STAFF MEMBERS

Exeter Associates, Inc. specializes in serving clients engaged in litigative, policy-making, and decision-making activities and in providing the highest quality consulting services to clients in the areas of regulatory policy, industry restructuring, utility supply planning, contract negotiation, and on a wide range of other contemporary economic issues. The senior professional staff has provided expert testimony on numerous occasions before state, federal, and foreign regulatory agencies; state and federal courts, the Federal Energy Regulatory Commission, the U.S. Postal Rate Commission, and U.S. Congress and state legislative committees and subcommittees. Summaries of the qualifications of Exeter's senior staff are presented below:

DR. STEVEN L. ESTOMIN is a principal of Exeter Associates and is a senior economist more than 30 years of experience in the areas of microeconomic applications, industry analysis, econometric modeling and environmental economics. He specializes in utility load forecasting, computer modeling, financial analysis, utility contract negotiation, cogeneration analysis, electric industry restructuring, power supply acquisition, and issues of competition and antitrust. Dr. Estomin has had major responsibility in evaluating long-term utility power supply options for U.S. Department of Energy and U.S. Air Force installations, and in negotiating long-term utility contracts for the U.S. government. Dr. Estomin has conducted electric sales and load forecasts for individual utility service areas and for the State of Maryland, and has testified on his review of electric sales forecasts prepared by utilities, including Pepco, Baltimore Gas & Electric Company, Commonwealth Edison, Central Maine Power, and Bangor Hydro. He has also testified on issues relating to statistical analysis, rate design, competition, and power supply acquisition for default supply service. Dr. Estomin holds a B.A., M.A., and Ph.D. in economics from the University of Maryland.

MR. DWIGHT D. ETHERIDGE is a principal at Exeter Associates with 29 years of wide ranging experience in the electric utility industry. His areas of expertise include retail competition, energy markets, risk management and control, distributed generation, telecommunications, contract rate negotiations, rate design, cost allocation and forecasting, revenue requirements and benchmarking studies. Mr. Etheridge supports clients on multiple utility issues, including planning and options studies, cost analyses related to negotiations and utility rate cases, power procurement and price projections, risk management and energy price hedging programs, and utility infrastructure analyses. While employed by an investor-owned utility, Mr. Etheridge held increasingly more responsible management positions in strategic, deregulation, pricing, and planning areas, including reporting to the CEO during electric deregulation and a merger of two utilities. Mr. Etheridge has extensive experience developing analytical and strategic solutions on a variety of utility issues and communicating on those issues to regulatory commissions, legislatures, senior management, boards of directors and the public. He has presented expert testimony on over 30 occasions and has acted as a spokesperson numerous times on television, radio, and in print. Mr. Etheridge holds a B.S. in business administration from the University of California, Berkeley.

MR. JEROME D. MIERZWA is a principal of Exeter Associates and a senior analyst with 24 years of public utility regulatory experience. At Exeter, Mr. Mierzwa has conducted purchased gas cost allocation analysis and rate design analysis, management audits and similar investigations of the natural gas supply and procurement policies and practices of interstate gas pipelines and local distribution companies (LDCs). Most recently, Mr. Mierzwa has been involved in evaluating performance-based incentive regulation for LDC purchased gas costs and the unbundling of LDC services. Mr. Mierzwa has participated in developing utility class cost-of-service studies, has presented testimony sponsoring gas, water, and wastewater utility cost-of-service studies, least-cost gas procurement and incentive regulation, in addition to presenting testimony addressing utility rate base, expenses and revenues. Mr. Mierzwa holds a B.S. in marketing and an M.B.A. in finance from Canisius College.

MS. CHRISTINA R. MUDD is a principal at Exeter Associates, Inc. with 20 years of experience in energy efficiency, renewable energy, and climate change policy. With Exeter Ms. Mudd provides detailed analysis on the economic impacts of energy and environmental policies. Ms. Mudd participates in the Maryland staff working group for the Regional Greenhouse Gas Initiative, assists the Maryland Department of Natural Resources, Maryland Energy Administration and Maryland Department of Environment reviewing policies and programs related to electricity regulation, energy efficiency, renewable energy, and climate change. Ms. Mudd also provides technical support to federal agencies by reviewing utility supply contracts and rates, and reviewing the economic feasibility of alternative energy projects. Ms. Mudd served as the Executive Director of the National Council on Electricity Policy from January 2005 to December 2006. The National Council is a partnership between the National Association of Regulatory Utility Commissioners, National Association of State Energy Officials, National Governors' Association, and National Conference of State Legislators. Ms. Mudd holds a B.S. in political science and biology from James Madison University and an M.A. in international affairs with a concentration in economics and energy policy from Johns Hopkins University School for Advanced International Studies.

MR. KEVIN L. PORTER is a principal of Exeter Associates and a senior analyst with nearly 30 years of experience. Mr. Porter has been active in renewable energy analysis and research since 1984. His scope of expertise includes the technical and economic status of renewable energy technologies, design and implementation of state and federal renewable energy policies, transmission access and pricing for renewable energy technologies, and electricity policy in general. He has advised the National Renewable Energy Laboratory, the State of Maryland, the American Wind Energy Association, and other clients on renewable energy and green power procurement and policy design, and has written or co-written over 60 reports, conference papers, and journal articles. He holds a B.S. in environmental studies from Lewis & Clark College in Portland, Oregon, and an M.A. in economics from The American University in Washington, D.C.