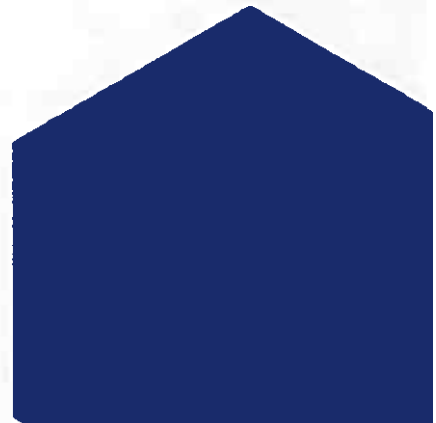
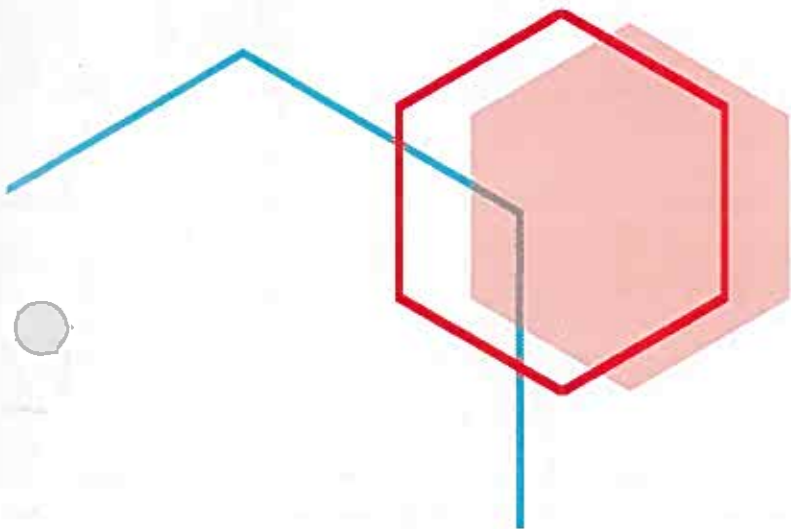


Sampson Engineering Proposal - Docket No. T-34695



Performing a Rate Review in Docket No. T-34695 - Crimson Gulf, LLC (Denver, Colorado), ex parte, In re: Application for a rate increase on service origination.

Thank you for the opportunity to respond to this Rate Review, Docket No. T-34695. I retired from Cleco after 33 years of service. Being a Professional Engineer for the State of Louisiana with License No. of 29927, I submitted many of the monthly Cleco regulatory fuel reports. I retired from Cleco as of October of 2017. Once again, thank you.



...

Sampson Engineering Proposal Docket No. T-34695

Performing a Rate Review in Docket No. T-34695 - Crimson Gulf, LLC (Denver, Colorado), ex parte, In re: Application for a rate increase on service origination.

Overview

My resume reveals my experience in various LPSC regulatory reporting. Monthly FAC and EAC reporting was one of the most recent LPSC reports I was accountable to submit. Before a given submission, any month to month FAC and EAC difference greater than 10% had to be addressed. The invoices for each fuel type used by the power plants including reagents were monitored and audited before invoice submission. Monthly submissions were reviewed to previous LPSC fuel filing audits. Each submission was accompanied with cover letters.

Plan of Action

A Draft Plan of Action and a timeline will be generated at the first meeting with the LPSC Staff. Sampson Engineering consultants will assist the Commission's Legal, Audit, and Economic Divisions in analyzing fuel purchases and usages in addition to ancillary charges. Plan of Action duties will include fuel filings review, draft data requests and review responses, review accompany work papers and financial data; review historical data including previous prior audits; participate in formal status conferences, pretrial conferences, depositions, and hearings; prepare for filing and audit memoranda/or pre-filed testimony in support of Staff's ultimate recommendations, together with exhibits supporting the memoranda and/or pre-filed testimony; and assist in the drafting of applicable motions, exceptions, briefing sheets and orders of the Commission. This Plan of Action will be tied to the General Order R-33390 which is the Rules Applicable To Common Carrier Petroleum Pipelines.

Furthermore, Sampson Engineering firm will participate in informal conference calls, meetings, and conferences with the Commission and its staff as well as attending any Business and Executive Sessions that the Staff deem necessary. A Draft Plan of Action and a timeline will be generated at the first meeting with the LPSC Staff.

The work associated with this Rate Review in Docket No. T-34695 will continue until the Commission has voted as the conclusion of the docket.

Notes

1. A glimpse of Sampson Engineering familiarity with Fuel Forecasting verses actual Fuel Volume.
2. A Draft Plan of Action and a timeline will be generated at the first meeting with the LPSC Staff.

• • •



Period of Representation

Although there is no time period associated for this Docket, the scope of representation is normally 12 months. Problems or resolutions to unforeseen issues might extend the time period. Provisions will be made to adjust the time line so that all milestones will be met. Sampson Engineering will be dedicated to this docket until the Commission vote on the resolution.

Minimum Requirement

Included in this proposal are the resumes of Alfreda Sampson and Dr. Tsala. Alfreda Sampson is a Professional Engineer for the state of Louisiana. Her license number is 29927. During Alfreda Sampson's career at Cleco, monthly fuel and invoice filings were part of her , accountabilities in addition to years of forecasting fuel costs for Cleco's day ahead power plant fuel requirements including Natural Gas units. Additionally, midterm and long-term fuel requirement forecasting including Cleco's Operating plan and fuel forecasting for Cleco's IRPs and FRPs. Doctor Tsala has a Doctorate in Electrical Engineering among his credentials.

Estimate of Cost

Follow is the Price chart for Alfreda Sampson and Dr. Tsala.

Name	Hourly Rate per hour
Alfreda Sampson	\$150/hour
Dr. Bart Tsala	\$200/hour
Administrative Assistant	\$50/hour

Conflict of Interest

Alfreda Sampson retired from Cleco after 33 years of service as of October of 2017. Being a Professional Engineer for the State of Louisiana with License No. of 29927, Alfreda Sampson submitted many of the monthly Cleco regulatory fuel reports. Alfreda Sampson has talked with attorneys to make sure there would not be a conflict of interest. There is no conflict of interest because Alfreda Sampson has never worked for Crimson Gulf nor has Alfreda submitted any reports on behalf of Crimson Gulf to any regulatory agencies.

• • •

Billing

All expenses, fees, and consultant compensation and all the corresponding documentation will follow the procedure described on the November 2014 General Order. It would be in Sampson Engineering best interest to follow these guidelines to be paid for services rendered.

Reservation of Rights

Sampson Engineering fully understands that the Commission has the power and sovereignty to reject, alter, or modify any RFP or RPP proposal.

NOTES

Sampson Engineering Proposal Budget for LPSC Docket No. T-34695

Performing a Rate Review in Docket No. T-34695 - Crimson Gulf, LLC (Denver, Colorado), ex parte, In re: Application for a rate increase on service origination.

From the Docket No. T-34695 Proposal

Follow is the Price chart for Alfreda Sampson and Dr. Tsala.

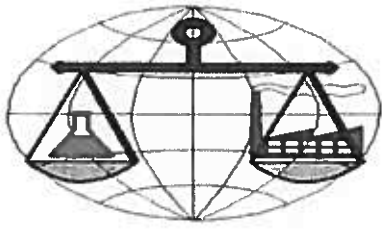
Name	Hourly Rate per hour
------	----------------------

Alfreda Sampson	\$150/hour
Dr. Bart Tsala	\$200/hour
Administrative Assistant	\$50/hour

Budget Items	Rate	Hours	Cost
Alfreda Sampson	\$150/hour	200	\$ 30,000.00
Dr. Bart Tsala	\$200/hour	40	\$ 8,000.00
Administrative Assistant	\$50/hour	60	\$ 3,000.00
Travel ⁽¹⁾			\$ 3,000.00
Meals ⁽¹⁾			\$ 1,000.00
Hotels ⁽¹⁾			\$ 1,000.00

\$ 46,000.00

(1) Dependent on the amount of travel and overnight events



Alfreda C. Sampson P.E. 29927

Chemical Engineer

1557 Hwy 495 Cloutierville, La 71416,

Cell 318-581-5754

Email Sampsonengineering@att.net

Objective: To become an Engineering Consultant for the Louisiana Public Service Commission

**Education: Chemical Engineering from Louisiana Tech University 1983
Professional License 29927 – State of Louisiana 2002**

Experience: Cleco Corporation - 33 years of Service which focused on regulatory compliance and operational procedures

- **Docket No. U-21497 Fuel Filing Compliance**
 - Design and Implementation of electronic workflow for Cleco's actual fuel operational reporting and fuel invoice reporting
 - Monitored, Evaluated, and Production of LPSC corporate monthly fuel and invoice reporting
- **Produced and Managed Corporate Forecasting - Short Term (Range Hourly to Eight Years)**
 - Determined Power Plant Fuel Requirement based on history and forecasted demand based on fuel market forward curves \$300M to \$650M
 - Forecasted Corporate Demand, Capacity, and Hourly Load
 - Forecasted Environmental Impact
 - Special Projects
- **Produced and Managed Corporate Forecasting - Long Term (Range 15 to 30 years based on Hourly load forecast)**
 - IRP –Evaluator and Analyzer - Cleco Long Term Power Plant Fuel Requirement based on operational history and forecasted demands which included on NG market forwards and futures and solid fuel market forecast as a baseline and other power products
 - Request For Proposal (RFP) Multiple projects Cleco Lead Power Plant Fuel Requirement based on operational history and forecasted demand which included on NG market forwards and futures and solid fuel market forecast. Resulting to Purchased Power Agreement (PPA) contracts and Madison3 Power Plant approval for construction.

- **Forecasted and Calculated Corporate Demand and Capacity and its Financial Budget and impact**
- **Forecasted and Calculated Environmental Impact and any Corresponding Financial**
- **Special Projects**
- **Produced and Managed Corporate Avoided, Incremental, and Decremental Costs**
 - **U22739 Avoided Cost Compliance**
 - **Avoided Costs – Hourly Costs reported monthly**
 - **35 baseline put, research, calculation, evaluation, and impact**
 - **Pre-MISO monitoring, impact, calculation, and reporting**
 - **MISO transition evaluation**
 - **Post-MISO reporting**
 - **Designed and Determined Qualifying Facilities (QF) Payments**
 - **Forecasted Avoided Costs – Hourly basis for 6 years**
 - **Annual Compliance Schedules**
 - **Incremental, Decremental, Transmission**
 - **Mirrored Avoided Calculation**
 - **Results used in Certain Negotiated Customer and QF Bills**
- **OSHA Compliance Corporate Implementation, Monitored, Trainer,**
 - **Hazardous Communication CFR 1200**
 - **MSDS Program selection and implementation**
 - **Evaluator of Corporate Chemicals**
 - **HAZWOPER (Hazardous Waste Operations and Emergency Response Standard) CFR 1910.120**
 - **Implemented Corporate Compliance**
 - **Selection of Hazwoper Trainer for Power Plants**
 - **Industrial Hygiene – Evaluator**
 - **Distribution Apparatus Shop Air Contaminants Evaluator**
 - **Laboratory Air Contaminants Evaluator**
- **Safety Investigation --- Behavioral Incentives**
 - **Investigator of Actual and Near Miss Accidents**
 - **Root Cause Analysis and Evaluator**
 - **Safe presentation and**
 - **Annual Cleco Corporate Statistics**
 - **SWESE Presentation of Louisiana Proposed Lead Regulation**
- **Dolet Hills Startup to include**
 - **Water Treatment and Production**
 - **Boiler water evaluation**
 - **Environmental Analyser**

- **Permit Testing and Reporting**
- **Groundwater Baseline and annual monitoring**

Areas of Expertise

- **Proficient with Microsoft Office Suite including Excel, Word, and Powerpoint**

Other Interests:

- **Foundational Board Member of the Kuumba Board that obtained \$800,000 for capital improvement and health services**
- **GRAN Board Evaluator and Researcher of the Tuscaloosa Marine Shell Impact for Central Louisiana Parishes**

4106 Goshawk Drive
Norman, OK 73072 (USA)

BART TSALA

Email: btsala@kidiaga.com

Mobile: +1 (405) 473-4407

More than 20 years of 500GW+ experience in the power sector with focus on:
**Energy Policy - Systems Economics & Planning - Energy Markets - Power Systems Operations
Grid & Portfolio Optimization - Software Engineering - Systems Implementation**

EXPERIENCE

2013 – Current **THE KIDIAGA GROUP (USA)**
Consulting Practice Lead

- Power Sector Reform
- System Planning: Generation and Transmission
- Markets Development: Policy, Design and Implementation
- Grid Operations: Research and Development, Analytics and Forensics
- Markets Optimization
- Portfolio Analytics
- Software Development
- Project and Team Management

Activities and Subject Matter Expertise include:

- o Research and Development in markets systems and optimization logics, Renewable Energy and Grid Expansion
- o **Mexico** (since 2016): provided technical assistance, analysis and implementation recommendations to the Ministry of Energy (**Sener**), and the National Grid and System Operator (**Cenace**) on market sustainability initiatives, including:
 - Congestion Management and Transmission Rights: Process and methodology recommendation, mathematical formulation review of transmission rights auctions for improved transmission development framework within the new electricity market
 - System Losses Management: market assessment and technical review of losses estimation and minimization, analysis and review of control areas real time balancing procedures, financial implications, policy and process recommendations for transmission and distribution networks loss handling for market sustainability
- o **US Western Energy Imbalance Market (EIM) (2015-Current)**: Provides system integration and implementation strategies recommendations for market participation. Activities include:
 - Process Change and Project Management
 - System Vendors Proposals Benchmarking
 - Business Processes and Workflows development
 - Technical Architecture and Design development
 - Systems Integration and Testing
 - Portfolio Optimization, Bidding and Structuring: methodology and processes developmentClients include: **Portland General Electric (PGE), Arizona Public Service (APS), Salt River Project (SRP)**
- o Advisory services to markets participants in U.S regional electricity markets
- o Generation and Transmission Scheduling Systems: Assessment, Design and Implementation Plan
- o Systems, Processes, Operational Based Market Strategies, and Organizational Infrastructure Assessment and Gap Analysis for participation scenarios including: full regional market participation, independent balancing authority scenario and co-dependent balancing authority environment
- o Advisory services to local communities in developing markets. Topics include:
 - Bid proposals on energy sector reform technical implementation
 - Mini-Grids development and Economic Sustainability
 - Capacity sufficiency assessment and sub-markets establishments
 - Energy access and transition in low income environments
- o SPP Phase I (~US\$M100): Design, implementation and go-live efforts for the Integrated Marketplace with complete project cycle participation
- o SPP Phase II (US\$15M+): Design, implementation and cost benefits assessments for post go-live initiatives in the Integrated Marketplace

2016 – 2017

ENGILITY/RTI

Consultant – Enhancing Capacity for Low Emission Development Strategies (EC-LEDS)

USAID advisor for energy markets development and power/gas sector policies reform in alignment with European Union Third Energy Package. Initiatives include:

- **Kosovo-Albania:** Market Coupling. Analysis review and benefits assessment. Activities development roadmap for common market establishment
- **Macedonia:** Improving Legal and Regulatory Framework through implementation plan development for electricity market opening; Assessment and development of options for power exchange establishment/participation; Energy efficiency and access implementation plan appraisals
- **Albania:** Regulatory Framework for a Fair Effective Electricity Model. Review and analysis on the country's proposed market model and market rules; Roadmap development for market opening and coordination options with neighboring countries
- **Albania:** Energy Strategy Development. Provided review and analysis of the country's efforts towards power and gas networks integration with the rest of Europe

Coordinating activities with:

- o Governments and Ministries. National Policies harmonization with regional and EU Integration objectives. Participatory appraisal and recommendations on issues prioritization, capacity building and technical support assessment
- o Regional Stakeholders: Transmission System Operators, Generation Companies, Distribution Sector. Technical articulation of policy, market and systems development

2010 – 2014

SOUTHWEST POWER POOL (USA)

Consultant to the Regional Transmission Organization (RTO) – Full Regional Market Implementation

Served as technical advisor to the Southwest regional grid organization on matters of power sector reform restructuring for the entire Southwest region of the U.S; helped with sector transformation from a regional energy imbalance sector framework into the **SPP Integrated Marketplace** with unbundling of transmission interest from generation and distribution, and through which a continuous wholesale market based dynamic offering framework of supply and demand allows for an efficient regional operational coordination over a long term, short-term and real-time basis, of capacity procurement in energy and ancillary services in a secure and reliable manner, and provides reliable economic signals for grid expansion and investment; has contributed to the assessment of needed regulatory policy changes. and the development of the new tariff in alignment with FERC compliance; guided the implementation of the finalized policies and market design he helped develop into operational systems and market processes including the day-ahead and real-time markets, the reliability commitment and congestion management processes, the settlement systems, thus allowing efficient central coordination of 16 balancing areas (authorities), for a total aggregated regional capacity exceeding 68GW. Advised and assisted **Market Design, Market Operations & Support** with the Integrated Marketplace implementation (~US\$100 Million regional power sector reform project) for US\$3Billion+ annual market with:

- Review, analysis and design development for key market processes and workflows: Congestion Management, Day-Ahead Market, Reliability Commitment, Real-Time Balancing Market, Settlements
- Language Development and review: Policy/Tariff, Business Processes and requirements, Market Protocols on technical matters
 - o Through internal and external stakeholders meetings, assisted with the language and rules write-up in protocols and corresponding tariff portions reflecting the development of the market systems and processes. Member of the language review and update team primarily for sections: Energy And Operating Reserve Market Processes, Transmission Congestion Rights Markets Processes, Market Monitoring and Mitigation
- Market-to-Market Coordination SPP\MISO: methodology development
- Innovative approaches on market processes and algorithms: proof-of-concepts and full-scale development
- Project and Team Lead for Market Systems Optimization and Market Clearing Engines:
 - o For Go-Live:
 - Responsible for Regional Network modeling integrity, including flowgates, constraints and losses assessment
 - Responsible for Algorithms Formulation architecture: integrity, cross-platform prototype development for vendor logics implementation calibration
 - Responsible for the testing platform development, internal and external validation, software improvement criticality assessment and Certification for market launch. Directed a 8-engineer leads and consultants team for Day-Ahead, Reliability Commitment and Real-Time Balancing Market
 - Responsible for Optimization Critical Path and Reliability Performance criteria, for processes timeline in Day-Ahead and Real-Time

- Post Go-Live: responsible for ensuring markets results credibility, over a projected \$Billion 3-5 /Year Regional Operational Cost
- Markets and Systems Compliance: testing, quality and reliability assessment
- Congestion Management - Design and Implementation:
 - Process Development
 - Allocation (ARR) and Auction (TCR) Processes Optimization for effective long term congestion management and long term transmission planning: Formulation, testing platform development and system validation
- Transmission Planning: Process Review, Cost Allocation
- Technical facilitator with systems vendors and other RTOs
- Special studies, projects and logics implementation:
 - Configuration Based Combined Cycle Regional Commitment Benefits
 - Responsible for Regional Cost Benefit Analysis development
 - Responsible for Design, R&D and testing plan development
 - Scarcity Pricing
 - Emergency Conditions
 - Co-optimization, Cascade Pricing and Demand Curves interaction
 - Renewable Energy and Demand Response Integration
- Market Trials: Scenarios Development and Deployment
- Operations procedures and policies for Consolidate Balancing Authority (CBA) for real time system balancing and reserve deployment: Development and Analysis
- Operational Forensics: workflow design and implementation
- Daily Systemic State of the Market: Analytics framework development in Market Performance Indices for Market Health and Trends Tracking: Day-Ahead, Reliability Commitment, Real-Time and Congestion Rights markets
- Review, analysis and compliance filing on Federal Energy Regulatory Commission (FERC) inquiries
- Advisor to:
 - Market Monitoring
 - Regulatory
- Market Sustainability Analysis
- Capacity building and outreach supporting efforts for:
 - Market Design Department
 - Operations Engineering and SPP Engineering Summits
 - Training Department
 - Settlements Department
 - Regulatory Department
- Expert Testimony presentations and support to various stakeholders groups:
 - Market Operations Policy Committee
 - Market Working Group
 - Board of Directors

2001 – 2012

POWER COSTS, INC. (USA)

Senior Principal Consultant (2010 – 2012)

Manager (2008 – 2010)

Senior Engineer (2001– 2007)

As a systems architect, Dr. Tsala has contributed to the development of several commercial platforms dedicated to facilitate and maximize market participation for energy companies operating under various regulatory regimes. As a technical advisor, through research development and whenever required, he has been able to guide regulatory and policy change in promoting or deprecating policy proposals language based on its measurable intended benefits or unintended adverse effects, and help regional grid organizations reduce post-implementation remedial processing costs. As a consultant, Dr. Tsala has provided training to various entities and organizations staff, and helped them prepare for the implementation of markets restructuring. During his assignments, he contributed to technical presentations, provided guidance towards the understanding of regulatory reform and tariff, framework for efficient capacity building, achieving cross-area expertise and learning from industry best practices, market efficiency benchmarking, and development of feedback mechanisms for regulatory and policy changes

• **Resident Expert on Electricity Markets – Policy, Systems, Processes and Economic Evaluation**

- **Analytics Manager:** coordinated system analytics related activities for consulting, customer support and assess market optimization/bidding rules implementation impacts for PCI analytics products. Products cover generation portfolio scheduling, capacity planning, bidding analytics, business processes and workflows development, hydro-thermal and gas/power network scheduling
- **Bidding Analytics Development Technical Lead:** responsible for providing guided algorithmic development and improvements for PCI GenManager (Bid-to-bill software platform for participants in organized markets) bidding analytics platform. Provided consulting to clients
- **Gas-to-Power: Economic Valuation, Coordination, Network Optimization Technical Lead and Reference:** under the then recently reformed U.S. Midwest power sector, Dr. Tsala developed a newly coordinated mechanism for gas procurement for energy companies facing difficulties in synchronizing the gas/power portfolios and operating under the new regulatory regime of liberalized energy and ancillary services market. The methodology took into consideration all physical, operational and contractual constraints associated with reliable gas transportation and delivery while acknowledging the regulatory rules of power delivery on a short term and real time basis, and has been used to forecast utilities' needs for gas storage capability, additional transportation capability, and daily gas contracts adjustments in a competitive and multi-technology generation assets environment. The methodology was commercialized as a financial/planning and scheduling tool (i.e. PCI Gas Management) for gas/power operational strategic assets management for term, day-ahead / real-time market operations. Clients for deployed solution on long-term, multi-day and optimal daily/intra-day regional gas nominations/transactions include Ameren
- **Portfolio Optimization Group Manager:** responsibilities for PCI Gentrader (Asset Portfolio Optimization for short-term and long-term needs) include:
 - Algorithm logics implementation, maintenance and enhancements
 - Software maintenance and release cycle coordination
 - Providing guidance towards training and customer support
 - Coordinating team deployment for consulting engagements
- **Market Design and Optimization - Prototyping:** developed a market simulation platform and algorithms for zonal and nodal (LMP) markets. The platform is used for analysis of:
 - Physical and Financial Fundamentals of advanced markets structures (local, national and regional)
 - System co-optimization: fundamentals, derivation of market pricing
 - System congestion management
 - System losses: fundamentals, impact of assessment methodologies
 - Fundamentals of market settlements
 - Bidding strategies: development, analysis and impact
 - Policy and market rules impacts on market behavior
 - Operational and Financial impacts of market policies
- **Technical Lecturer to Regional Transmission Organizations and Independent System Operators (RTOs/ISOs):** conducted several seminars and consulting assignments for CAISO (USA), MISO (USA), ISO New England (USA), SPP (USA) and ERCOT (USA) to prepare their teams for nodal market implementation and operations
- **Consultant to RTOs/ISOs Market Participants:** led efforts in customers' systems integration and improving market participation competitiveness (e.g. bid-to-bill workflows, strategic bidding, processes implementation, capacity market valuation and analysis, optimal day-ahead vs. real-time and congestion arbitrage) projects in organized markets. Markets include MISO (USA), CAISO (USA) ERCOT (USA), PJM (USA) and SPP (USA). Clients include Westar Energy, LCRA, CPS Energy, SCE, KCPL, EnergyCo, Dominion Virginia Power, Ameren, Calpine
- **US Midwest Regional Market Implementation – Consultant to the RTO:** Technical advisor to a consulting team in charge of providing guidance towards sector restructuring implementation for the entire Midwest region of the U.S with unbundling of transmission interest from generation and transmission, through which a continuous wholesale market based dynamic offering framework of supply and demand allows for an efficient regional operational coordination over a long term, short-term and real-time basis, of capacity procurement in energy in a secure manner while preserving local authorities reliability responsibilities, and provides reliable economic signals for grid expansion and investment. Advised and assisted the PCI consulting team to MISO (USA) in the development, review, analysis and vetting of tariff/ business processes, testing and validation of systems processes implementation for the Day-2 market (regional power sector reform), including the Day-Ahead and real-time

markets, reliability commitment and congestion management processes. This effort led to the successful implementation of the MISO Day-2 market with more than 110GW in installed capacity.

- **US NorthEast Regional Market Implementation – Consultant to the ISO:** Deployed to the regional grid organization in the New England region of the U.S to help improve operational and system coordination processes and solutions, and help with the launch of the newly designed wholesale market as part of the sector restructuring in the region, in alignment with regulatory and policy changes. Advised and assisted the **Business Technology Group** in preparing for the launch of the SMD market. Developed a platform for validating the incumbent vendor's market infrastructure and architecture solutions, and benchmarking other vendors' commercial network and security-based market solutions for **ISO New England (USA)**. This effort led to the successful launch of the New England Standard Market Design with over 30GW in installed capacity, and whose main objectives is to provide better economic signals for stronger competition and sound investment in the region's bulk power system, through various market processes including a capacity market, day-ahead and real-time markets, congestion management
- **Congestion Impact Analysis:** Financial Transmission rights (FTRs) markets and implications on energy/capacity portfolio development and settlements processes
- **Operational and Reliability Scheduling, System Planning and Portfolio Management:** Conducted and supervised numerous assignments in the area of capacity and transmission expansion planning for energy companies operating under various regulatory regimes including liberalized and strongly regulated environments. The developed methodologies have been adopted in addressing short term planning, reliability analysis, workflows and operational strategies, regulatory inquiries and feedback policy adjustments for rate case analysis, avoided cost studies, fuel budgeting, assets investment decisions and integrated (regional) resource planning, corporate financial planning, operational and risk management as well as identifying the need for additional support systems for more efficient operational strategies, for over 190GW in assets capacity in the U.S and abroad. Completed assignments for planning and financial departments on improving portfolio competitiveness when dealing with assets acquisition, Integrated Resource Planning (IRP), transmission expansion, rate case analysis, state commissions inquiries, assets valuation, origination (e.g. PPAs, energy transactions economic valuation), resource based financial planning, renewable portfolio standard assessment, and risk management (e.g. volatility and market environment uncertainty). Clients include **LCRA, CLECO, NextEra Energy, Northwestern Energy, Westar Energy, Reliant Energy, OGE, GSOC, TXU, Suez Energy, Direct Energy, Sempra Generation, Ameren, AEP, FPLR, First Energy, CPS Energy, Reliant Energy, FMPA, Entergy, LADWP, APS, Centrica (England), Endesa (Spain) and TepCo (Japan)**

1997 – 2005

UNIVERSITY OF OKLAHOMA, NORMAN, OK

- **Dissertation Research, School of Electrical and Computer Engineering**

- **Short-Term Scheduling:** developed a new unit commitment methodology for portfolio scheduling and market valuation participation using adaptive capacity rewards positioning
- **In-depth analysis and implementation of techniques applied to short-term unit commitment problem.** Techniques include: Lagrangian Relaxation, Sequential Bidding, Benders Decomposition and Mixed Integer Programming
- **Long Term Planning:** developed a new methodology that considers long term financial investment coupling constraints along with feasible strategies dynamically derived from optimal operational portfolio scheduling, for planning and decision-making under uncertainty

- **Research Assistant, Electric Research Power Group**

- **Extensive analysis of electricity prices under re-regulated market conditions for Oklahoma Gas and Electric Corporate Planning department**
- **Developed a stochastic Generation Production Cost software for Oklahoma Gas and Electric Corporate Planning department**
- **Developed single area economic dispatch, unit commitment software for thermal systems**
- **Maintenance of Electrical Load Model software for Oklahoma Gas and Electric**

EDUCATION

2005

PH.D ELECTRICAL ENGINEERING

University of Oklahoma, Norman, OK

Area: Power Systems Economics, Operational Portfolio Management Optimization, Portfolio Risk Management, Power Systems Planning, Markets Development

Dissertation: Generation Asset Planning under Uncertainty

1999 **M.S ELECTRICAL ENGINEERING**
University of Oklahoma, Norman, OK
Area: Optimization Methods and Power Systems Scheduling
Thesis: Analysis of Uncertainty in Electricity Prices

1994 **B.S ELECTRICAL ENGINEERING**
Institut Supérieur Industriel de Bruxelles, Brussels, Belgium
Area: Power Systems Network and Analysis, System Automation and Control

IEEE ACTIVITIES

- **IEEE Power System Economics Subcommittee, member**
- Peer Reviewer
- PES 2006 – Current: Sustainable Electricity Systems for Developing Countries Task Force member
- 2006 – Current: Prize Paper Award Committee (PPAC) member
- PES 2008 General Meeting: Combined Energy and Ancillary Services paper/panel session chair
- PES 2010 General Meeting: Demand Response and Smart-Grid Technologies panel session co-chair

LANGUAGES

- Native: French and English
- Functional Spanish

OTHERS

- Alstom Markets and EMS Systems, Nexant Hedge, PowerWorld, ABB Market Systems
- Microsoft: Office and Visual Studio, PCI Software Suite, Fortran, AIMMS, CPLEX

04.23.2018

To

Kim Troclair
Legal Division
Louisiana Public
Service Commission
602 N. 5th St., Galvez
Bldg. 12th Floor (70802)
P.O. Box 91154
Baton Rouge, LA 70821
(225)342-9888
www.lpsc.louisiana.gov

Dear Kim Troclair,

Thank you for your feedback. My client lists are provided below.

External to Cleco:

Tuscaloosa Marine Shell Owner Investigation

Primary Contact: Pastor Joseph Green

318 613-2009

pastorjoesgreen@gmail.com

Owners from the following Parishes

1. Grant
2. Rapides
3. Avoyelles
4. Natchitoches

Internal to Cleco: Last 18 of the 33 years of career:

<u>Recipients</u>	<u>External Recipients</u>	<u>Reports</u>
<u>Robert Cleghorn</u>	<ol style="list-style-type: none">1. <u>LPSC</u>2. <u>QF customers</u>3. <u>Transmission</u>	<ol style="list-style-type: none">1. Fuel (monthly Generation fuel and corresponding fuel invoices)2. RFP3. IRP4. Avoided Costs (monthly and annual)5. Incremental Costs6. Decremental Costs7. Special Projects (Makewhole, etc)

Sampson Engineering

Tel 318-581-5754

1557 Hwy 495

Cloutierville, La 71416

Sampsonengineering@att.net

SE, PE

<u>Recipients</u>	<u>External Recipients</u>	<u>Reports</u>
<u>Bryan</u> <u>Harper/</u> <u>Shane</u> <u>Hilton</u>	1. Front Office 2. Accounting 3. Executive Team	1. Load Forecasting 2. Fuel Forecasting 3. Operating Plan 4. Short/ Mid/ Long term Fuel and Capacity Forecasts

Potential Future Clients

- LPSC
- Fuel Companies
 - Natural Gas
 - Coal
 - Lignite
 - Petcoke
- Environmental Firms
- Engineering Firms

Thirty Three years of experience with Cleco which included analytics associated with the PPA with Williams and Calpine in addition to the analytics which resulted in the construction of Madison 3, exposed the analytics needed for these multi million contracts and multibillion dollar construction of Madison 3..

Warm regards,



Alfreda Sampson. P.E.

Sampson Engineering

Sampsonengineering@att.net

LOUISIANA PUBLIC SERVICE COMMISSION
GENERAL ORDER
LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE

Docket No. R-33390 Rules Applicable To Common Carrier Petroleum Pipelines

(Decided at the Commission's Business and Executive Session held February 26, 2015.)

Purpose

The Louisiana Public Service Commission ("Commission" or "LPSC") initiated this rulemaking with the goal of formally adopting rules and policies specific to the regulation of petroleum pipeline common carriers. This General Order supersedes any previous orders and minute entries pertaining to petroleum pipelines. The requirements in this General Order apply prospectively to all persons engaged in the transportation of petroleum by pipeline as common carriers for hire ("Carriers").

Jurisdiction

The Louisiana Constitution and the Louisiana Revised Statutes Title 45, Chapter 5, Part I, provide that common carriers are subject to regulation by the Commission. La. Const. Art. IV, section 21 (B) provides, in pertinent part,

The commission shall regulate all common carriers and public utilities and have such other regulatory authority as provided by law. It shall adopt and enforce reasonable rules, regulations, and procedures necessary for the discharge of its duties, and shall have other powers and perform other duties as provided by law.

La. R.S. 45:252 provides,

All pipe lines through which petroleum is conveyed from one point in this state to another point in the state are declared to be common carriers as defined in R.S. 45:251 and are placed under the control of and subject to regulation by the Louisiana Public Service Commission.

Rules

Section I. Registration as Petroleum Pipeline Common Carrier

Prior to initiating service, a Carrier shall submit a registration with the Commission and attach tariff(s) that comply with the requirements in Section 3 and Section 4 of this General Order. The registration shall be in the form of a letter and include the Carrier's name, organizational structure identifying ownership of the pipeline system(s), pipeline system name(s), pipeline system map(s), and regulatory contact information.

Carriers with existing tariffs or approved tariff exceptions on file with the Commission are not required to submit a registration letter or re-submit tariffs. Tariffs or approved tariff exceptions already on file with the Commission will remain in effect.

Section 2. Notification Requirements

No later than 60 days after the effective date of a change, a Carrier shall notify the Commission of a change to any of the information that the Carrier provided in its registration as a common carrier pipeline, including notification that the Carrier terminates its registration with the Commission as a common carrier, i.e. all tariffs and contracts have been cancelled and the Carrier has terminated common carrier operations in Louisiana.

Section 3. Tariffs

All Carriers shall maintain tariffs on file with the Commission or obtain approval for a tariff exception. Tariff filings shall contain a transmittal letter which must contain the Commission tariff number, describe the purpose of the filing, and explain any changes to the Carrier's rates, rules, terms or conditions of service.

Carriers shall ensure that tariffs on file with the Commission are accurate at all times. Tariffs must be consecutively numbered and identify where changes have been made in existing rates, rules, regulations or practices. Changes may be indicated in a manner such as highlight, background shading, bold, underline, strike-through, or use of the following terms:

Description	Symbol
Increase	[I]
Decrease	[D]
Change in wording only	[W]
Cancel	[C]
Unchanged Rate	[U]
New	[N]

Tariff filings shall be reviewed at the Staff level, except rate increases requiring Commission approval as stated in Section 4.D of this General Order. Absent written notice to the contrary from Staff within 30 days after receipt of the filing, tariff filings reviewed at the Staff level are deemed accepted by the Commission 30 days after receipt.¹

A) Tariff Contents

¹ The Commission's acceptance of a tariff for filing shall not be construed as a waiver of the requirements of this General Order; and such acceptance is without prejudice to any orders which have been or may be made by the Commission.

All tariffs shall contain the following information:

Responsible Party. The name of the Carrier, the mailing address of the Carrier, and the name, e-mail address, and phone number of the Carrier's designee responsible for maintaining the Carrier's compliance with Commission orders.

Statement of Rates. Rates must be stated explicitly in dollars and cents, per barrel or other specified unit. The name of the pipeline and designations of the places from and to which the rates apply must be arranged in a simple and systematic manner.

Rules. Rules affecting the jurisdictional transportation rates or services provided for in the tariff. Tariffs must include rules governing jurisdictional matters such as prorationing of capacity, receiving, tanking, delivering, transferring and loading, commingling, quality control, carrier liability, and all other jurisdictional charges, services, allowances, absorptions and rules which in any way increase or decrease the amount to be paid on any shipment or which increase or decrease the value of service to the shipper. Rules may be separately published in a general rules tariff. Rate tariffs that do not contain rules must make specific reference, by LPSC tariff number, to the governing general rules tariff. The Rules may also cover non-jurisdictional services offered by Carriers and their related fees, such as inventory management services and gravity bank services.

Effective Date. The effective date of the tariff.

Type of Commodity. The type(s) of commodity being transported through the pipeline.

B) *Cancellation of Tariff.* A Carrier must cancel a tariff when all of the services reflected in the tariff are terminated or no longer provided by that Carrier. The Carrier must submit notification of the cancellation to the Commission within 30 days of the termination of service or provision of service by that Carrier. The cancellation notification must include a statement certifying that the Carrier's current shippers affected by the cancellation have been notified of the cancellation. This paragraph does not apply to temporary suspensions of service.

C) *Tariff Exception.* A Carrier may request approval from the Commission's Executive Secretary to provide service on a particular pipeline segment pursuant to the terms of transportation contracts with individual shippers rather than a tariff. The request shall include the list of shippers, an explanation regarding why individually negotiated contracts will meet the needs of the Carrier and the shippers, and whether there are parties other than the listed shippers seeking transportation on the pipeline.

Carriers operating under the tariff exception must comply with all requirements of this General Order except those related to tariff and rate filings. These Carriers are also obligated to report to the Commission the addition of or the refusal of service to new shippers and the termination, expiration, or renegotiation of contracts with existing shippers.

Section 4: Tariff Rates

Carriers shall charge rates that are just and reasonable, and not unreasonably discriminatory, for services offered under the same or similar circumstances.

A) *Discounted Rates.* The tariff may include discounted rates for i) long-term service ii) high volumes, iii) underwriting the provision of service on a pipeline system by providing assistance in financing construction, repair, or maintenance of the pipeline system, or iv) promoting the use of under-utilized pipeline capacity. The tariff shall clearly state which rates are discounted rates and the type of discount, as opposed to general tariff rates. The shippers receiving discounted rates may have a higher priority in an allocation situation, but remain subject to allocation.

B) *Premium Rates.* The tariff may include premium rates for Firm Service. Firm Service is defined as a transportation service that allows a shipper to contract for reserved capacity for a set term based on a maximum monthly volume, with the terms and conditions of such service defined in a Firm Service contract. The tariff shall clearly state which rates are premium rates for Firm Service, as opposed to general tariff rates. When allocation of capacity is required per the terms of the Firm Service contract, the sum of the volumes of Firm Service shippers shall not exceed 90% of the total available monthly capacity.

C) *Rate Decreases.* A Carrier may decrease its rates, fares, or charges by filing an updated tariff with the Commission but will be subject to all provisions of this General Order if the Carrier seeks to increase such rates, fares or charges at a later date. The transmittal letter shall confirm that notification of the rate change has been provided to the Carrier's current shippers affected by the rate decrease and describe the form of notification provided to such shippers.

D) *Rate Increases.* As stated in the following paragraphs, a Carrier may increase its rates through Indexing, Commission Approval, or Limited Temporary Surcharge.

Indexing. A Carrier may file a revised tariff no later than September 1 of each year reflecting a rate increase that is tied to the indexed annual percentage rate increase last published

by the FERC.² Staff may accept tariffs reflecting increased rates based on indexing that are submitted after September 1 for good cause shown. The transmittal letter shall confirm that notification of the rate change has been provided to the Carrier's current shippers affected by the rate increase and describe the form of notification provided to such shippers. Carriers that do not have a FERC-approved tariff may also use this indexing method.

Except for good cause, and Staff approval, a Carrier who implements a rate increase or temporary surcharge pursuant to Commission Approval, as stated in the next paragraph, shall not, for a period of twelve months following implementation of that rate increase or temporary surcharge, submit a revised tariff for another increase on the same service based on indexing.

Commission Approval. A Carrier may request Commission approval of a rate increase or temporary surcharge by submitting a written letter request. The request shall provide the amount of the requested rate increase or temporary surcharge, a justification for the increase or surcharge, a proposed revised tariff, and confirmation that the Carrier's current shippers affected by the rate increase or temporary surcharge have been notified of the request with a description of the form of notification provided to shippers.

Limited Temporary Surcharge. A Carrier may file a revised tariff reflecting a temporary surcharge for the purpose of amortizing capital expenditures associated with the pipeline. The transmittal letter shall include: 1) an explanation of the need for the capital expenditure and its amortization, and 2) confirmation that the temporary surcharge has been approved by the Carrier's current shippers affected by the surcharge.

Section 5. Transfer of a Pipeline Segment

A) Notice Only

Under the circumstances stated below, a Carrier shall provide written notice to the Commission prior to selling, merging, consolidating, or otherwise transferring a pipeline segment which has rates and services subject to the jurisdiction of the Commission. The notice shall be a joint filing of the transferor and transferee and provide a summary of the pipeline segment transfer transaction.

If the transferee will ship its own product only, the notice shall include:

- 1) For a pipeline segment with a tariff on file with the Commission, a statement that the transferor agrees to follow the provisions of this General Order for cancelling its tariff.

² The FERC indexing rate is currently adjusted annually based on changes in the Producer Price Index for Finished Goods ("PPI-FG").

- 2) For a pipeline segment with a tariff exception, a statement that the transferor agrees to notify the current shippers affected by the transfer within 30 days of the transaction.

If the transferee is a Carrier, or will become a Carrier as a result of the transfer, the notice shall include:

- 1) A statement that the transferee will submit a registration with the Commission and follow the provisions of this General Order.
- 2) For a pipeline segment with a tariff on file with the Commission,
 - i) a statement that the transferee adopts the rates in the transferor's tariff and agrees to file its own tariff, or statement that the transferee does not adopt the rates and a copy of a new tariff with documentation showing approval of the new tariff by current shippers, and
 - ii) a statement that the transferor agrees to follow the provisions of this General Order for cancelling its tariff.
- 3) For a pipeline segment with a tariff exception, i) a statement that the transferee adopts the same set of circumstances and provisions in the tariff exception as previously approved by the Executive Secretary, and ii) a statement that the transferor agrees to notify the current shippers affected by the transfer within 30 days of the transaction.

B) Staff or Executive Secretary Approval Required

Under the circumstances stated below, a Carrier shall provide a written request prior to selling, merging, consolidating, or otherwise transferring a pipeline segment which has rates and services subject to the jurisdiction of the Commission. The request shall be a joint filing of the transferor and transferee and provide a summary of the pipeline segment transfer transaction.

If the transferee is a Carrier, or will become a Carrier as a result of the transfer, who does not meet the requirements for Notice Only transfer as stated above, then the transferor and transferee must obtain Staff approval prior to the transfer of a pipeline segment operating pursuant to a tariff and must obtain Executive Secretary approval prior to the transfer of a pipeline segment operating pursuant to a tariff exception.

A Carrier is not required to meet the requirements of General Orders dated June 16, 1953; October 28, 1968; March 18, 1994; and February 4, 2013.

Section 6. Assumptions of Liability

A Carrier is not required to meet the requirements of the General Orders dated June 5, 1996 and November 13, 1996 regarding issuance of securities and the assumption of liabilities or obligations by public utilities.

Section 7. Annual Reports

Each year, within 120 days after the close of that year's business, a Carrier shall submit an annual report in the form provided by the Commission. The report shall include capital investment, depreciation, operating expenses, operating revenues, volume transported, pipeline

segment acquisitions and dispositions, changes to name or ownership, year-end date, and shall be sworn to by the officer having personal knowledge of the facts set forth in the report.

Section 8. Shipper Complaints

The Commission will consider petitions filed by shippers in the manner provided by La. R.S. 45:251 et seq.

Section 9. Fees

A Carrier shall submit the following fees with filings:

Registration	\$200.00
Application for rate increase - indexing or limited temporary surcharge	\$ 50.00
Application for rate increase - non-indexing	\$300.00
Notice of name change	\$150.00
Transfer of assets - Notice Only	\$150.00
Transfer of assets - Approval Required	\$250.00
Late annual report	\$500.00
Citation Fee	\$ 25.00

Section 10. Fines

No Carrier shall willfully violate any provision of this General Order, or fail to perform any duty imposed by this General Order. Upon being found guilty, a Carrier who violates this General Order shall be fined no less than \$100 and no more than \$5,000 for each offense.

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Commission Action

On motion of Commissioner Campbell, seconded by Commissioner Skrmetta, with Commissioner Holloway and Commissioner Boissiere concurring and Commissioner Angelle temporarily absent, the Commission voted to approve Staff's recommendation and adopt the proposed general order.

IT IS THEREFORE ORDERED:

This General Order is effective immediately.

**BY ORDER OF THE COMMISSION
BATON ROUGE, LOUISIANA**

March 9, 2015

/S/ CLYDE C. HOLLOWAY

DISTRICT IV
CHAIRMAN CLYDE C. HOLLOWAY

/S/ SCOTT A. ANGELLE

DISTRICT II
VICE CHAIRMAN SCOTT A. ANGELLE

/S/ FOSTER L. CAMPBELL

DISTRICT V
COMMISSIONER FOSTER L. CAMPBELL

/S/ LAMBERT C. BOISSIERE

DISTRICT III
COMMISSIONER LAMBERT C. BOISSIERE, III



EVE KAHAO GONZALEZ
SECRETARY

/S/ ERIC F. SKRMETTA

DISTRICT I
COMMISSIONER ERIC F. SKRMETTA



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Deputy Undersecretary

COMMISSIONERS

Eric F. Skrmetta, Chairman
District I
Mike Francis, Vice Chairman
District IV
Foster L. Campbell
District V
Lambert C. Boissiere III
District III
Craig Greene
District II

May 1, 2018

Re: Solicitation for under \$50K bids from outside consultant to assist Staff in Performing a Rate Review in Docket No. T-34695 – Crimson Gulf, LLC (Denver, Colorado), ex parte, In re: Application for a rate increase on service originating at Grand Isle and Terminating at St. James for Crude Petroleum as currently outlined in LPSC Tariff No. 75.2.

Dear Qualified Consultants:

Crimson Gulf, LLC (“Crimson Gulf” or “the Company”), a Common Carrier petroleum pipeline regulated by the Louisiana Public Service Commission (“LPSC” or “Commission”) filed a request with the Commission on October 31, 2017 seeking to increase the crude petroleum transportation rate for service originating at Grand Isle in Jefferson Parish, Louisiana and terminating at St. James in St. James Parish, Louisiana. By way of this bid solicitation letter, the Commission is seeking bids from independent technical consultants to assist the Commission’s Transportation Staff in this litigated proceeding.

Bidders who reply should demonstrate their familiarity with Commission General Order No. R-33390 dated March 9, 2015 in Docket No. R-33390 Louisiana Public Service Commission, ex parte, In re: Rules Applicable to Common Carrier Petroleum Pipelines. Section 4 of the aforementioned General Order requires just and reasonable, and not unreasonably discriminatory rates and sets forth guidelines for approval of rate applications. Section 4(D) allows Common Carrier Petroleum Pipelines to increase rates through Indexing, Commission Approval, or a Limited Temporary Surcharge.

Crimson Gulf is requesting Commission Approval to increase its rates by 109.65%, from its current rate of \$0.6942 to a proposed rate of \$1.4554 per barrel. According to Crimson Gulf, the increase is necessary as a result of decreases in the volume of crude petroleum transported and increasing expenses associated with providing the Grand Isle Service. Crimson Gulf states that its current rate is insufficient to cover operating expenses and provides no return on invested

capital. The Company reports a revenue shortfall of \$3.483 million over the next 12 months without the increase and anticipates additional reduction in volume making an even larger than requested increase warranted¹

The application is contested by Energy XXI GOM, LLC, who, according to the *Motion to Intervene, Motion for Rejection and Notice of Protest of Energy XXI GOM, LLC*, will bear approximately \$2.8 million of the requested \$3.483 million increase. A litigated hearing schedule was set April 25, 2018 requiring Commission Staff and Intervenor testimony no later than July 30, 2018 and a 2-day hearing will be held November 14-15, 2018. Additional filings in this matter, including the direct testimony of Crimson Gulf witnesses can be viewed on the Commission's website through the Commission's Document Access.

Bidders should be prepared to conduct discovery and sponsor expert testimony, assist the Transportation division in preparing for the hearing, assist with the filing of pre- and post-hearing pleadings as necessary, and testifying before the Commission at a public meeting on the issues involved in this proceeding. It is anticipated that testimony will include, but is not limited to a discussion of whether cost of service is an appropriate methodology to be used in determining whether Crimson Gulf's requested rates are just and reasonable.

In accordance with the November 10, 2014 General Order governing contract employees, bidders should be qualified to render expert testimony with respect to rate making methodologies applicable to Common Carrier oil pipelines. In addition, bidders shall disclose all previous, current, and anticipated future representation of clients, through testimony or otherwise, before the LPSC or other similar local, state, or federal bodies involving any matter that arises out of or is substantially related by common factual, legal, or regulatory issues to a matter for which the consultants are seeking to be retained, regardless of whether this representation would be considered a conflict of interest.

The Commission Staff anticipates that the consultant hired in this proceeding will be able to satisfactorily perform the services described herein for a bid amount less than \$50,000.00 and, thus, an RFP is not mandated by the 2014 General Order, which states in pertinent part.

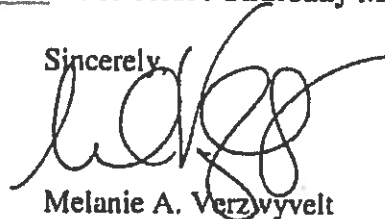
Contracts for consulting and/or legal services which are anticipated to result in a maximum bid amount of compensation, including all professional fees but excluding expenses, to not exceed fifty thousand dollars (\$50,000.00), may be considered and approved by the Commission without the necessity of an RFP. The expenses allowed for such services shall be limited to twenty percent (20%) of the total bid amount, unless the Commission specifically authorizes a greater amount.

The successful bidder shall submit detailed bills, including supporting documentation for all expenses, which are only allowed to be billed at cost and in accordance with the State Travel Guidelines in effect at the time the expenses are incurred.

¹ Please note that these numbers are merely indicative of the Company's request, as there is testimony regarding the impacts of the Tax Cuts and Jobs Act, which may result in a modification of the requested increase in this case, and the Company's testimony was not review in depth for the purposes of this bid solicitation letter.

Staff intends to place conforming bids on the agenda for the Commission's May 16, 2018 Business and Executive Session. If you would like to submit a bid, please do so electronically to melanie.v@la.gov and kim.troesclair@la.gov on or before Thursday May 10, 2018.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melanie A. Verzwylt', written over the word 'Sincerely,'.

Melanie A. Verzwylt
LPSC Staff Attorney