

**Proposal to Provide Independent Technical Consulting
Services for Entergy's 2016 Request for Proposals for
Renewable Resources**

To

Louisiana Public Service Commission

602 North Fifth Street
Baton Rouge, Louisiana 70821

By



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February 17, 2016

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Ms. Kathleen Richardson
Louisiana Public Service Commission
Office of General Counsel
602 North Fifth Street (Galvez Building) (70802)
Baton Rouge, Louisiana 70821-9154

Dear Ms. Richardson:

Boston Pacific Company, Inc. (“Boston Pacific”) is pleased to submit this proposal to the Louisiana Public Service Commission (“Commission” or “LPSC”) in response to the Commission’s RFP 16-01 in Docket No. X-33876. As detailed herein, we propose to assist the Commission Staff (“Staff”) in the review and analysis of Entergy Services, Inc.’s (“Entergy”) upcoming Request for Proposals (“RFP”) for up to 200 MW of renewable resources and to assist Staff with any related LPSC resource certification applications that may be filed by or on behalf of Entergy Louisiana, LLC.¹

As we understand it, the Commission is seeking an independent technical consultant to assist Staff in reviewing and analyzing Entergy’s upcoming renewables RFP. That is exactly the experience Boston Pacific has earned over 28 years while assisting our clients with high-profile generation resource decisions. As explained in our proposal, Boston Pacific has unmatched experience as an independent monitor for all types of procurements in markets across North America. We have decades of experience in monitoring unit-contingent RFPs for the full range of technologies, including (a) natural gas-fired combined cycle, (b) conventional coal-fired resources, (c) clean coal (IGCC), (d) solar photovoltaics, (e) concentrated solar power, (f) onshore wind, (g) offshore wind, (h) geothermal projects, (i) biomass, (j) energy storage, and (k) ocean thermal. We have monitored and evaluated RFPs in Maryland, Oregon, California, Maine, Pennsylvania, New Jersey, Hawaii, Oklahoma, Illinois, Mississippi, and elsewhere, often on multiple occasions.

Boston Pacific also has achieved unmatched experience in monitoring procurements for other electricity products, including default service in deregulated markets for ratepayers who decide not to select a competitive electric supplier, and for renewable energy credits (RECs). Since 2004 Boston Pacific has monitored almost 200 procurements totaling over 200,000 MW of capacity and energy resulting in billions of dollars of purchases for Commissions in New Jersey, Ohio, Illinois, Delaware, DC, Maryland and Pennsylvania, and has monitored procurements for RECs from wind, solar, off-shore wind, and other renewable technologies in New Jersey, Illinois, Pennsylvania, and elsewhere.

¹ Throughout our proposal, we will refer to “Entergy.” For purposes of the renewables RFP, we mean Entergy Services, Inc. For purposes of the certification application, we mean Entergy Louisiana, LLC.

Our independence is as important as our experience. Boston Pacific brings to this engagement almost three decades of providing independent advisory evaluations and monitoring services for clients conducting resource procurements. Our independence will bring additional credibility to Entergy's procurements, an especially important factor in order to encourage robust competition from third party suppliers (who might be concerned about facing competition from an Entergy affiliate), which can lower costs for ratepayers.

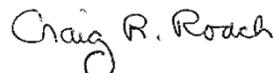
Boston Pacific also has unique experience with both Entergy and the MISO markets. In 2015, we completed our third consecutive management audit of Energy Mississippi, which assessed the fuel and power purchasing practices of the utility. Of particular note is that, as part of that work, we assessed Entergy Mississippi's performance in MISO. We audited Entergy Mississippi's (a) power purchase and generation offers in the MISO markets, (b) participation in MISO's capacity market, (c) sales and revenues from the MISO ancillary services, day-ahead, and real-time energy markets, and (d) its financial transmission right (FTR) revenues. In addition, for the past eleven years, we have served as the independent advisor to the Southwest Power Pool RTO's Board of Directors. As part of that work, we have provided reports and testimony on MISO markets and operations, from market design to resettlements to loop flow.

Further, Boston Pacific brings a unique set of experts to this engagement. We offer a multidisciplinary team with backgrounds in economics, finance, engineering, and policy we are well-suited to address any type of renewable RFP. Dr. Craig Roach, President of Boston Pacific, brings forty years of electric industry experience and has submitted testimony, affidavits, or comments to FERC in more than 30 proceedings, to public utility commissions in 25 states plus D.C. (some on multiple occasions), to regulatory bodies in three Canadian provinces, in state and federal courts, in arbitrations, and to Congress. Frank Mossburg, the day-to-day leader of this engagement, is an expert in electricity procurement design and implementation and resource planning and evaluation, and has testified before several state commissions. In all, our project team brings almost 100 years of industry experience and expertise to this engagement.

Importantly, Boston Pacific has a tried-and-true management approach that will ensure efficiency. Making sure that our clients are always informed of all issues throughout an engagement is a hallmark of our project execution. We will be in frequent contact, both formally and informally, with LPSC Staff through various means such as email and conference calls.

In the pages that follow, we provide our proposal. We also invite you to visit our website, www.bostonpacific.com, to learn more about our firm.

Sincerely,



Craig R. Roach, Ph.D.

President

Boston Pacific Company, Inc.

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I. Expertise, Experience, and Compliance with Minimum Requirements

Boston Pacific has significant expertise and experience working with commissions and utilities across North America to design, implement, and evaluate procurements of all types. One of our core strengths is being able to independently and effectively monitor procurements in which we vet every step of a procurement process in order to ensure it is fair, transparent, and competitive. This entails a thorough examination of whether the utility has followed competitive bidding guidelines and other established regulations, the design of the procurement process, communications between the utility and bidders, and evaluation of bids.

Our team has experience with a variety of different procurement types such as unit-contingent, renewable energy certificate (REC), and default service procurements. We also have experience with a range of technologies, including both conventional and renewable generation. These include natural gas, clean coal, onshore and offshore wind, solar photovoltaic (PV), concentrated solar power (CSP), geothermal, biomass, waste-to-energy, energy storage, and ocean thermal.

With a multidisciplinary team with backgrounds in economics, finance, engineering, and policy we are well-suited to address any type of renewable RFP. Our skill set also includes significant modeling capabilities to develop in-house cost models as well as experience in reviewing inputs and outputs of planning models such as PROMOD and Strategist. We also meet or exceed all of the minimum requirements of the RFP. Below, we provide our qualifications, experience, and expertise as it addresses each of the areas in the Minimum Requirements section on pages 3 and 4 of the RFP. Where applicable, we provide representative engagements that demonstrate our experience in each area.

1. Boston Pacific is an industry leader in serving as an independent evaluator and/or monitor of utility RFPs and procurements which have prepared us to anticipate and manage concerns “with respect to all of the issues addressed in the docket and which are likely to arise in the proceeding.”²

As noted above, Boston Pacific has significant expertise and experience working with commissions and utilities across North America to design, implement, and evaluate procurements of all types. Below, we provide the following representative project descriptions that demonstrate our capabilities to meet the requirements of the LPSC. They cover three areas: (a) unit contingent procurements; (b) renewable energy advisory and project evaluations; and (c) default service procurements.

A. Unit Contingent Procurement Examples

i. Oklahoma: Procurements for Gas-Fired Combined Cycle and Wind

From 2007 to 2009, we served as the Independent Evaluator (IE) on behalf of the Oklahoma Commerce Commission (OCC) for Public Service Company of Oklahoma’s (PSO) long term RFP for baseload generation. We led a collaborative effort among stakeholders to

² “Minimum Requirements,” page 3 of the RFP.

design the RFP. We monitored the issuance of the RFP, independently evaluated bids, and reviewed utility bid evaluation. We monitored contract negotiations with winning bidders and presented our findings to the OCC. The RFP resulted in a signed contract for a 520-MW natural gas combined cycle resource.

On behalf of the Oklahoma Commerce Commission, Boston Pacific reviewed Oklahoma Gas & Electric's (OG&E) proposed 197.8 MW Crossroads Wind Farm and testified to our findings. Our work included price and risk comparisons of OG&E's proposal to other recent proposals provided from the market. Boston Pacific carefully reviewed the wind resource assessment and project contracts, including the Turbine Supply Agreement, Asset Purchase Agreement and EPC contract, to determine the extent and value of the risk protections laid out in the project contracts and we compared those risk protections to those in other signed third-party PPAs between the Company and other suppliers.

In addition, Boston Pacific reviewed OG&E's modeling of the levelized cost of the project and compared that cost to third-party offers. We also reviewed the Company's production costs savings analysis. We assisted in negotiating a settlement between OG&E and the Oklahoma Commerce Commission which contained several key risk protections for ratepayers. Through this and our other work on wind projects, Boston Pacific has accumulated great knowledge of the current capital and operational costs of wind projects and of the standard terms and conditions for many types of wind project contracts.

Also for the Oklahoma Commerce Commission (OCC) we served as the Independent Evaluator for Public Service of Oklahoma's (PSO) 2013 Wind RFP. We reviewed all proposals submitted, worked with the utility to determine a shortlist, reviewed transmission impact studies to determine the impact on bid ranking, and monitored contract negotiations with shortlisted bidders. In addition, we worked with utility personnel to develop and review portfolio modeling cases to ascertain the impact of taking various amounts of new wind-powered generation. As a result, PSO successfully procured 600 MW of new wind PPAs. The OCC approved the transactions on February 4, 2014.

ii. California: Renewables Procurements

In 2013, Boston Pacific was selected by the California Public Utilities Commission in to serve as an Independent Evaluator for transactions from Pacific Gas & Electric (PG&E). Most recently, we completed the evaluation of PG&E's Sixth Renewable Auction Mechanism (RAM 6) RFO. This solicitation sought to procure utility scale renewables (3 to 20 MW) under 10 to 20 year fixed-price contracts and received bids from solar PV, wind, biomass and other renewable resource types. For just this year the RFO also sought smaller scale (i.e. 0.5 to 3 MW) solar PV facilities located in specific communities to serve various state mandates. Our work entailed the following tasks: (a) review and comment on PG&E's competitive bid process for solicitations; (b) review and comment on PG&E's solicitation outreach and adequacy of its methods; (c) assess the design of PG&E's evaluation and selection methodology for solicitations; (d) provide feedback to PG&E on its implementation of the evaluation and selection methodology; (e) during the solicitation, provide ongoing feedback as to whether PG&E is applying impartial treatment to participating bidders consistently; and (f) review, evaluate and rank all offers independently. Ultimately, thirteen projects totaling 146.25 MW were selected. We performed

similar for the previous RAM RFO. In addition, we are currently serving as IE for PG&E's Compressed Air Energy Storage (CAES) RFO, which seeks innovative proposals for storage using compressed air stored in underground caverns to generate electricity during needed times.

iii. Oregon: Procurements for Gas-Fired Combined Cycle, Renewable Resources

From 2007 to 2012, we served the Oregon Public Utilities Commission (OPUC) as the IE for several unit-contingent RFPs issued by PacifiCorp for both conventional and renewable energy resources. We reviewed the design of each RFP and recommended design changes to make the procurement more open and fair and to increase the chances of a successful result. We monitored RFP issuance and bidder interaction, reviewed bidder qualifications, ranked and scored proposals and reviewed utility modeling to make a recommendation on final shortlists of bidders before the OPUC. We reviewed cost build-ups of affiliate offers on a line-by-line basis to ensure that all costs were included and ensured that affiliate offers were treated the same as third-party offers. We also monitored contract negotiations with shortlisted bidders. The end results of our work were the construction of two large wind farms and one new natural gas fired combined-cycle plant.

iv. Mississippi: Integrated Gasification Combined Cycle Procurement

In 2009, on behalf of the Mississippi Public Service Commission, we were asked to conduct an independent evaluation of Mississippi Power Company's proposed Kemper County integrated gasification combined cycle (IGCC) project. We conducted a detailed review of the cost and performance of the company-sponsored project and monitored a RFP that solicited natural gas resource alternatives to the project. Our effort concluded with the submission of a detailed report of our analysis to the Commission. The IGCC project went forward with, at our recommendation, a cost cap that has protected ratepayers from cost overruns.

v. Maryland: Gas-Fired Combined Cycle Procurement

In 2011 and 2012 we assisted the Maryland Public Service Commission in designing and conducting a RFP for generating resources under a long-term contract. We assisted the Commission in designing and issuing the RFP and evaluating the bids. We evaluated and scored proposals on a price and non-price basis and made a recommendation for a winning supplier to the Commission. Once the recommendation was accepted we mediated final contract negotiations on behalf of the Commission between the Maryland utilities and the RFP winner. The effort resulted in a contract for a new, 660 MW, natural gas combined cycle resource.

vi. Hawaii: Geothermal Resource Procurement

Boston Pacific is currently serving as the Independent Observer for Hawaii Electric Light Company's RFP for 25 MW of dispatchable geothermal capacity. To date, we have advised the Hawaii Public Utility Commission on the design of the RFP, providing input on the evaluation criteria and weightings, the transparency of the evaluation methodology, and minimum threshold requirements that include matters such as permitting, siting, and experience. We have also

monitored the competitiveness and fairness of the RFP and conducted an evaluation of the bids. For these bids, we had to review a range of project characteristics, including their ability to finance, construct, and operate the project, and obtain necessary permits. Our work for this RFP is ongoing.

vii. Virgin Islands: Wind, Solar, Geothermal, Ocean Thermal, Plasma-Arc Gasification Waste-to-Energy, and Municipal Solid Waste Procurement

Boston Pacific designed and managed a competitive solicitation for alternative energy for the U.S. Virgin Islands Water and Power Authority (VIWAPA). VIWAPA is the sole electric utility in the U.S. Virgin Islands and is highly dependent on oil for electricity generation. The goal of the solicitation was to reduce the costs of providing electricity to its customers and to decrease the exposure of VIWAPA – and ultimately, its customers – to volatile oil prices by attracting the development of alternative generation facilities. We specifically designed the RFP to allow a wide range of alternative energy technologies, especially renewable energy technologies, to compete. Fourteen proposals were received and evaluated. These included wind, solar photovoltaic, geothermal, ocean thermal energy conversion, plasma-arc gasification waste-to-energy, and refuse derived fuel municipal solid waste technologies.

B. Renewable Energy Advisory and Project Evaluations Examples

i. New Jersey: Off-Shore Wind

Boston Pacific evaluated the economic and technical viability of offshore wind proposals on behalf of the New Jersey Board of Public Utilities (BPU). The New Jersey Offshore Wind Economic Development Act calls for the development of at least 1,100 MW of generation from qualified offshore wind projects. It also calls for an application process and framework under which the BPU is to consider and, if appropriate, approve applications for offshore wind projects and offshore wind renewable energy certificates (ORECs).

We advised New Jersey on three key areas of the offshore wind program. First, we developed procedures and a framework that will be used to objectively and consistently evaluate all offshore wind projects that apply to sell their ORECs to New Jersey. The framework contains the evaluation criteria used to score each application and covers all aspects of an offshore wind project, including: cost-benefit analysis, OREC pricing, technology, management and contractor experience, financial capability and analysis, permitting, and compliance with regulations. Second, we advised the BPU in revising their existing regulations to improve the manner by which the offshore wind application process will work, the obligations of applicants, and the content required in each application. For example, we suggested new supporting documentation that applicants would need to submit so that their proposed offshore wind project could be more thoroughly evaluated such as requiring certification for turbines, so applicants can better demonstrate the viability of their projects. Third, we completed an evaluation of an OREC application. The application was for a proposed 25 MW offshore wind farm off the coast of Atlantic City. Our evaluation entailed assessing the economic and environmental benefits of the Project, the level of OREC price, the proposed turbine and foundation, wind resource and energy

production, energy and capacity price forecasts, sales into PJM, decommissioning plan, and many other key documents and project information. We drafted two reports that were submitted to the BPU containing our conclusions on the application. Thereafter, we filed testimony and served as BPU Staff's experts in a proceeding regarding the application.

ii. Maine: Ocean Energy Resources

Boston Pacific reviewed terms and conditions for long-term contracts for Renewable Ocean Energy Projects (Ocean Energy Review) on behalf of the Governor's Office of Energy Independence and Security for the State of Maine (Maine OEIS). Our Ocean Energy Review made several recommendations to the Maine OEIS, all of which were designed to protect Maine ratepayers from higher prices and/or the risk of cost overruns and non-performance by offshore wind and tidal energy resources.

Specifically, Boston Pacific's Ocean Energy Review provided the following recommendations to the Maine OEIS. First, we recommended Maine use a competitive procurement process in soliciting bids from Ocean Energy Projects to minimize costs to Maine ratepayers. Second, we recommended that Maine employ strict pay-for-performance contract terms to minimize the risk of cost overruns and poor performance. Third, we suggested that that Maine use an application process whereby an interested applicant would be required to demonstrate the technical, financial, and environmental viability of its proposed project. Fourth, we advocated for requiring applicants to submit detailed cost-benefit analyses of their project, focusing on net economic, environmental, and ratepayer impacts. Fifth, we recommended Maine create a carve-out in Maine's Statutes for Renewable Energy Credits specifically for Renewable Ocean Energy Projects. Sixth, to minimize risk to ratepayers, we recommended that Maine purchase only Ocean Renewable Energy Credits, not energy and other products, from winning applicants. Seventh, we suggested Maine include a number of ratepayer protections in their contracts, including a "rate impact limit" to protect Maine's rates from increasing above a certain threshold as a result of these projects and a liquidated damages clause to protect against non-performance. Our Ocean Energy Review, dated April 12, 2012, was submitted to the Maine Legislature for consideration in the 126th Legislative Session.

iii. U.S. Department of Energy Loan Guarantee Program: Wind Resources

On behalf of the U.S. Department of Energy (DOE), Boston Pacific served as a market and financial advisor to their Loan Guarantee Program to conduct due diligence and perform analyses to determine whether certain projects could repay a DOE loan. For these projects, Boston Pacific reviewed business plans, contracts such as PPAs, financial projections and models, performed an industry and competitor review, and analyzed applicable legal and regulatory frameworks in order to assess financial viability, suitability for DOE's loan guarantee program, credit risk areas, and mitigation measures for such credit risk areas. Boston Pacific advised on two wind projects that received DOE loans and that are now commercially operating.

C. Competitive Power Procurement Examples

Beyond the unit-contingent procurements listed above Boston Pacific has achieved unmatched experience in monitoring full requirements procurements in deregulated markets for ratepayers who decide not to select a competitive electric supplier. Since 2004 Boston Pacific has monitored the procurement of over 200,000 MW of capacity and energy resulting in billions of dollars of purchases for Commissions in New Jersey, Ohio, Illinois, Delaware, DC, Maryland and Pennsylvania. In each of these engagements we work to ensure that the procurement is designed and conducted in an open, fair and transparent manner. We evaluate the competitiveness of each procurement as well as the prices received to ensure that the state is getting the best deal possible given current market conditions.

For example, Boston Pacific has served the Illinois Commission as its procurement monitor for the 2006 Auctions and the 38 RFPs that were held from 2008 through 2015. We have been monitors of most of the major full requirements solicitations in the country, including (a) New Jersey's 2007-16 Basic Generation Service Auctions, (b) the 2005-15 Standard Offer Service (SOS) RFPs for the District of Columbia, (c) Delaware's 2007-10 SOS RFPs, (d) Maryland's SOS RFPs in 2004-06 and 2010-15 for all four utilities, (e) Ohio's Auctions in 2009-15 for FirstEnergy's service territory, 2011-15 for Duke Energy Ohio's service territory, 2013-2015 for Dayton Power and Light's service territory, and in 2014 and 2015 for AEP Ohio's service territory, and (f) Pennsylvania's RFP from 2009-12 for Allegheny Power's (now West Penn Power) service territory.

In addition to default service procurements we have also monitored procurements for RECs from various sources. For example, in Illinois last year, we monitored two procurements conducted by the Illinois Power Authority (IPA) which sought RECs from new solar-powered distributed generation resources sized between 5 kW and 2 MW. We worked with the IPA to design fair procurement rules and evaluation methods, develop a reasonable contract, and evaluate all offers made into the RFP.

2. Boston Pacific is “qualified and prepared to prepare and render expert testimony, and be cross-examined”³

Boston Pacific also has an unmatched record of providing expert witnessing before regulatory bodies and in courts of law. We have submitted testimony, affidavits, or comments to FERC in more than 30 proceedings, to public utility commissions in 25 states (including Louisiana) and the District of Columbia, some on multiple occasions, to regulatory bodies in three Canadian provinces, in state and federal courts of law, in arbitrations, and to Congress. Our expertise spans RTO markets, utility operations, resource investment decisions, environmental policy, and utility finance. We routinely provide expert testimony and litigation support in our work on behalf of state Commissions in monitoring and evaluating utility RFPs.

A full list of testimonies and publications by our key personnel is provided in Appendix A, Section A.

³ “Minimum Requirements,” page 3 of the RFP.

3. Boston Pacific is familiar “with both the MBM and 1983 Orders and should, at a minimum, be experienced in analyzing the operations, books and records of utility companies.”⁴

Boston Pacific has considerable experience in analyzing the operations, books, and records of utility companies, and we are well familiar with the key regulations and Commission Orders that govern Entergy’s renewable RFPs.

From 2012 to 2014, we conducted consecutive, annual management audits of Entergy Mississippi on behalf of the Mississippi Public Service Commission. As part of that audit, we looked at all aspects of Entergy Mississippi’s practices as they related to fuel and power purchasing, and we reviewed hundreds of transactions and thousands of pages of Entergy’s internal documents and statements. Our audit considered all costs related to the Energy Cost Recovery Rider, a significant portion of the retail rate paid by Entergy Mississippi customers.

In 2011, we were selected by FERC and NERC to conduct a highly confidential audit of a major US utility after a major blackout. FERC and NERC negotiated a remedial action plan to fix gaps in the utility’s reliability plan. Our audit looked at reliability practices in all areas of the utility, from the operations control center, to human resource decisions, to training, and to executive chain of command. We audited financial transactions related to the utility’s compliance as well as training programs and enhancements for employees across the utility. We looked at the utility’s database management process, internal auditing schedules and practices, regulatory and reliability compliance materials, and received software demonstrations of essential elements of the utility’s operations. Finally, we audited the utility’s emergency operations and communications protocols as well as the utility’s modeling practices and personnel decisions to ensure that the utility had improved in this critical area of utility performance.

We have familiarized ourselves with the MBM and 1983 Orders will ensure that the RFP process adheres to all necessary regulations. In addition to filing the notice requirements with appropriate time before the RFP, we will work with Entergy to ensure the informational filing is complete. This will require a review of several Entergy documents, such as a statement of need justifying the purchase of this capacity resource, the proposed RFP, the plan to hold a technical conference, the contract to be signed by the winner, confidentiality agreements, a plan to ensure affiliates are treated just like any other bidder, and a proposed methodology for evaluating bids. Since this RFP is for renewable resources, the standards for justifying this procurement and comparison to alternative purchases are not as stringent. Furthermore, should it be necessary, we will ensure that any transmission needs are considered as part of the proposal, and losing bidders who request an explanation for their loss are provided a detailed explanation.

4. Boston Pacific has expertise in all other areas listed by the LPSC in the RFP, including:

A. Appropriate accounting standards and practices for electric utilities⁵

⁴ “Minimum Requirements,” page 3 of the RFP.

⁵ “Minimum Requirements,” page 3 of the RFP.

Boston Pacific has routine experience with electric utility accounting practices. For example, in our utility audit work (see above), we must understand utility regulatory accounting in order to trace fuel, power purchasing, and other costs through the appropriate utility line item.

In addition, we have extensive experience calculating revenue requirements for utilities. For example, Boston Pacific developed a revenue requirement model for two different integrated gasification combined cycle (IGCC) facilities – one proposed in Illinois (Taylorville) and the other proposed in Mississippi (Kemper). In both cases, we worked for the utility commission to determine the expected costs and potential risks. Our highly detailed model covers all the factors that will drive rates including capital costs, CWIP, federal tax and financing incentives, fuel costs, plant heat rates, net electricity production, operation and maintenance costs, carbon dioxide and other byproduct revenue, and many others. Our analysis also included multiple sensitivities and scenario analyses, showing the effects of changing costs and performance factors on the overall costs and rate impacts of the facilities. For Mississippi in particular, the Revenue Requirement model tested the effects of cost overruns by the utility and helped the Commission implement a 20% cap on capital cost overruns to protect the Mississippi ratepayers. In fact, the cost of the plant is now more than double the initial estimate, but the cost cap has limited the amount that the utility can pass through to ratepayers.

B. The Commission’s Rules and Orders pertaining to the RFP process as it relates to the acquisition of power supply resources, including but not limited to the Commission’s Market Based Mechanisms Order and its 1983 Order, as amended⁶

As detailed in Section I.3 above, Boston Pacific is familiar with the Commission’s Rules and Orders pertaining to power and capacity procurements. We are confident that our tested approach of active monitoring throughout the procurement process will ensure that the process requirements are met every step of the way. Furthermore, reviewing draft documents from Entergy ahead of time will ensure that filings are accurate the first time, and can hold up to scrutiny in Commission proceedings.

C. Principles associated with purchase power contracts and the competitive process, including but not limited to analyzing whether or not a particular resource meets the utility’s need for power and whether the considered resources are able to meet those needs⁷

As thoroughly explained in Section above, Boston Pacific has significant expertise and experience working with commissions and utilities across North America to design, implement, and evaluate procurements of all types. One of our core strengths is being able to independently and effectively monitor procurements in which we vet every step of a procurement process in order to ensure it is fair, transparent, and competitive. This entails a thorough examination of whether the utility has followed competitive bidding guidelines and other established regulations,

⁶ “Minimum Requirements,” page 3 of the RFP.

⁷ “Minimum Requirements,” page 3 of the RFP.

the design of the procurement process, communications between the utility and bidders, and evaluation of bids.

Our team has experience with a variety of different procurement structures such as unit-contingent, renewable energy certificate (REC), and competitive power auctions. We also have experience with a range of technologies, including both conventional and renewable generation. These include (a) natural gas, (b) clean coal, (c) onshore and offshore wind, (d) solar photovoltaic (PV), (e) concentrated solar power (CSP), (f) geothermal, (g) biomass, (h) waste-to-energy, and (i) ocean thermal.

Please see Section I.1, above, for a list of examples of our work in monitoring and evaluating utility RFPs.

D. Whether or not a resource will provide reliable service at the lowest reasonable cost⁸

In Boston Pacific's vast monitoring experience, it is important to make sure bidders are not only offering services at the lowest reasonable prices, but that they can follow through on the offered prices. In all our engagements we are looking for the best deal for ratepayers in terms of price, risk, reliability, and environmental performance, examining both price and non-price components of each bid. Non-price factors are generally based on public terms in the RFP, including factors like qualification procedures, site control, completeness of permitting and risk of obtaining certain permits, experience of development team, technology risk, transmission access, financing capability and credit risk, and changes made to a model contract.

To provide the Commission with a typical of example of how we ensure that a resource will provide reliable service at the lowest reasonable cost comes from our work in Oregon. PacifiCorp, an Oregon utility, asked the Oregon Commission for a waiver of competitive bidding guidelines to purchase the Chehalis combined-cycle plant. The Oregon Commission asked us to analyze the transaction and make a recommendation to the Commission on the waiver. Our review analyzed the project sale documents, operating characteristics and planning model outputs, and compared the price and risk to third-party offers. We analyzed key project components such as natural gas prices, transmission costs, heat rates, dispatch patterns, and O&M costs and made recommendations for additional risk protection measures for ratepayers. We also provided a supplemental analysis which delved deeper into transmission cost agreements, differences in natural gas prices between major PacifiCorp pricing points and an analysis of the transaction with the GRID model. Our purpose in this substantial analysis was to assess the utility's resource plan regarding the Chehalis plant for its impact on reliability and its cost.

Another example of this work was comes from Oklahoma, where we reviewed Oklahoma Gas & Electric's (OG&E) proposed Crossroads wind farm. OG&E presented a proposed transaction, including turbine purchase agreement, O&M agreement, EPC agreement, and land purchase documents. We compared the risks in this proposed contract to other PPAs that were

⁸ "Minimum Requirements," page 3 of the RFP.

currently available in the marketplace. We then recommended in our testimony additional risk protection measures to ensure that ratepayers would receive comparable protection from the project as they would under a standard PPA. We also provided expert testimony in the proceeding on the matter that resulted in acceptance of three PPAs for 600 MW of wind energy resources. We assisted in negotiating a settlement between OG&E and the Oklahoma Commerce Commission which contained several key risk protections for ratepayers.

E. Resource planning methods to improve the efficiency of a utility’s power supply operations and whether the utility is making use of any such methods⁹

A key tenet of our work on behalf of our state Commission clients is that the utility’s resource decisions – including RFPs – should be an offshoot of the utility’s planning process. That means that the utility should be engaged in regular planning that uses rigorous modeling and reasonable, vetted, transparent planning assumptions. This ensures that when a utility issues an RFP, the Commission can be assured that there is a clear need for the resource being sought in the RFP.

Our representative examples – listed in section I.1 above – demonstrate our experience with utility planning processes. One example worth underscoring is our work on behalf of the Hawaii Public Service Commission, where we serve as the independent observer for Hawaii Electric’s geothermal RFP. In our reports to the Hawaii Commission, we have repeatedly voiced our concerns that the geothermal RFP was not driven by the utility’s planning process. Along with our duties in monitoring and evaluating the RFPs, we have sought changes to the utility’s planning process to better support the utility’s procurement efforts.

F. Public interest criteria for approval of or purchase power contracts¹⁰

We routinely assist our state Commission clients in assessing power purchase contracts, including a determination on whether the contracts are in the public interest. Typically, at the conclusion of our evaluations of utility RFPs and procurements, the utility negotiates a power purchase contract with the winning bidder(s); then, we are asked to determine if the contract is in the public interest. Our engagements in Hawaii, Oklahoma, Oregon, California, Maryland, New Jersey, and other jurisdictions are excellent examples; please see section I.1 above for detailed explanations of those engagements.

G. Commission rules on affiliate transactions and cost recovery mechanisms for power supply resources, including Entergy’s Formula Rate Plan, the Commission’s Fuel Clause Recovery Order, and Commission General Order U-21497 dated November 6, 1997¹¹

We will pay special attention to any conflict of interest declarations. This is a standard part of what we do in many procurements – typically where there are affiliated bidders. As an

⁹ “Minimum Requirements,” page 3 of the RFP.

¹⁰ “Minimum Requirements,” page 3 of the RFP.

¹¹ “Minimum Requirements,” page 3 of the RFP.

example, in Oregon the utility is allowed to submit a “benchmark” resource in their own RFPs. When this occurs we review the cost buildup of the benchmark resource on a line-by-line basis to ensure that it is a reasonable cost estimate.

Boston Pacific has significant experience with cost recovery mechanisms for utilities, including those in Entergy and in Louisiana. For example, our management and review audit of Entergy Mississippi considers all costs related to the Energy Cost Recovery Rider, a significant portion of the retail rate paid by Entergy Mississippi customers. Our audit scrutinized Entergy Mississippi’s pass-through of the costs of natural gas, coal, nuclear fuel, and long-term and short-term power. Our experience with utility cost recovery mechanisms can also be found in our intimate knowledge of utility revenue requirements. As noted above, Boston Pacific developed a revenue requirement model for two different integrated gasification combined cycle (IGCC) facilities – one proposed in Illinois (Taylorville) and the other proposed in Mississippi (Kemper).

Boston Pacific also has experience with the LPSC, its proceedings, or its orders, having testified before the Commission on eight occasions. Boston Pacific, and Dr. Roach specifically, have submitted expert testimony before the LPSC on issues such as the prudence of passing electricity purchasing costs through the fuel adjustment clause, determining avoided cost prices, and commentary on rate proposals of Louisiana clients. In one specific example, we filed testimony at the LPSC which analyzed the accounting and dispatch practices under the Entergy System Agreement. We reviewed company fuel adjustment clauses (FAC) to determine if items that should have been analyzed in a standard rate case were instead improperly included in the FAC. We also reviewed hourly EGSL dispatch data for a multi-year period to determine if there were any improprieties in EGSL dispatch practices.

H. MISO tariffs, rules and planning processes, generally, and specifically related to resource adequacy planning processes and the use of zonal resource credits.¹²

Boston Pacific has a deep working understanding of RTO markets, including the MISO markets. We served the Mississippi Public Service Commission by auditing the fuel and power purchasing practices of Entergy Mississippi for three years. Of particular note is that, as part of that work, we assessed Entergy Mississippi’s performance in MISO. We audited Entergy Mississippi’s (a) power purchase and generation offers in the MISO markets, (b) participation in MISO’s capacity market, (c) sales and revenues from the MISO ancillary services, day-ahead, and real-time energy markets, and (d) its financial transmission right (FTR) revenues. In addition, as part of our work for SPP, we have submitted expert testimony regarding MISO’s governance structure, resource adequacy construct, and transmission expansion cost allocation mechanism. We have also provided analysis to SPP regarding resettlements in the MISO markets and used MISO as a point of comparison in analyzing SPP’s Integrated Marketplace design proposal.

Boston Pacific has a record of experience with RTO market rules and planning processes, including MISO. Boston Pacific’s unique experience in RTO markets was earned through our

¹² “Minimum Requirements,” page 4 of the RFP.

role as the independent advisor to the Southwest Power Pool RTO's Board of Directors for ten years, from the day SPP created its energy imbalance market in 2004 through today. In that role, we served as the market monitor for SPP, producing the 2004 through 2008 State of the Market Reports and advised on the 2009 State of the Market Report. We assisted in the design and implementation of a real time locational marginal pricing energy market, which successfully came on-line in February of 2007. We also were tasked with helping to design screens and metrics for this market that were vital for our monitoring for generation market power. In 2010, we produced a thorough, independent analysis of SPP's proposed "Integrated Marketplace," which includes new day-ahead and real-time energy markets and a co-optimized operating reserves procurement. We reviewed all aspects of SPP's RTO market design, including its day-ahead market, reliability unit commitment process, virtual bidding proposal, financial transmission rights methodology, and replacement energy procurement practices. We have also advised SPP's Board of Directors and Staff on a variety of market-related issues, including demand response integration, bid cost recovery and resettlements, and FERC compliance issues.

More broadly, our Project Director Vincent Musco, joined Boston Pacific in 2010 after eight years at FERC working on a variety of U.S. RTO market issues. Vincent's work at FERC spanned the full range of FERC-related matters applicable to States, including market rules for several RTO markets, transmission planning and cost allocation designs, and resource adequacy issues. At FERC, Vincent was a trusted source of information and advice for FERC Commissioners on market-related issues such as backstop capacity procurement, virtual bidding, financial transmission rights, scarcity pricing, and market mitigation. Vincent also attended and participated in stakeholder meetings as a FERC representative at both ISO New England and California ISO. At Boston Pacific, Vincent has submitted expert testimony on U.S. RTO issues and has been the project lead for our SPP work.

Additionally, we have experience with the use of zonal resource credits (ZRCs). Since 2008, we have monitored Ameren Illinois' capacity procurement. In the September 2015 RFP, it was for ZRCs. Here the utility solicited half of their ZRCs for the 2016-17 period in advance of the spring auction for ZRCs as a way to serve as a price hedge, given the extremely high prices being seen in the Ameren zone in 2015. We worked for the Illinois Commerce Commission to monitor this procurement, determine whether the benchmark created by the procurement monitor was reasonable, as well as advise the Commission that given the uncertainty with the ZRC market it was wise to not procure ZRCs at that time for the 2017-18 period.

II. References

Boston Pacific has provided five pertinent references for the LPSC to contact if it so chooses. The first is Brandy Wreath, the director of the Oklahoma Corporation Commission's Public Utility Division, who can attest to our engagements for the Oklahoma Corporation Commission. The second is Jim Eckelberger, Chairman of the SPP RTO Board of Directors. He can speak to our extensive service for the SPP RTO board over the last ten years. The third is Katherine Collier, Executive Secretary to the Mississippi Public Service Commission, who can attest to the quality of our work including an engagement to perform an audit of Entergy Mississippi and our work on the Kemper IGCC facility. The fourth is Bob Erwin, the general counsel to the Maryland Public Service Commission. He can speak to the quality of our expert

testimony on behalf of the Maryland Commission in a federal preemption case. The fifth is James Griffin, Chief Researcher of the Hawaii Public Utilities Commission. Mr. Griffin can speak to our work on Hawaii Electric's geothermal RFP.

1. Public Utility Division of the Oklahoma Corporation Commission

Reference: Brandy Wreath, Director
Telephone: (405) 522-3356
Email: b.wreath@occemail.com
Address: 2101 North Lincoln Blvd.
Oklahoma City, OK 73105

2. Southwest Power Pool Regional Transmission Organization (SPP RTO)

Reference: Jim Eckelberger, Chairman of the Board
Telephone: (214) 692-6166
Email: eckelberger@earthlink.net
Address: 6714 Meadow Road
Dallas, TX 75230

3. Mississippi Public Service Commission

Reference: Katherine Collier, Executive Secretary
Telephone: (601) 961-5405
Email: katherine.collier@psc.state.ms.us
Address: P.O. Box 1174
Jackson, MS 39215-1174

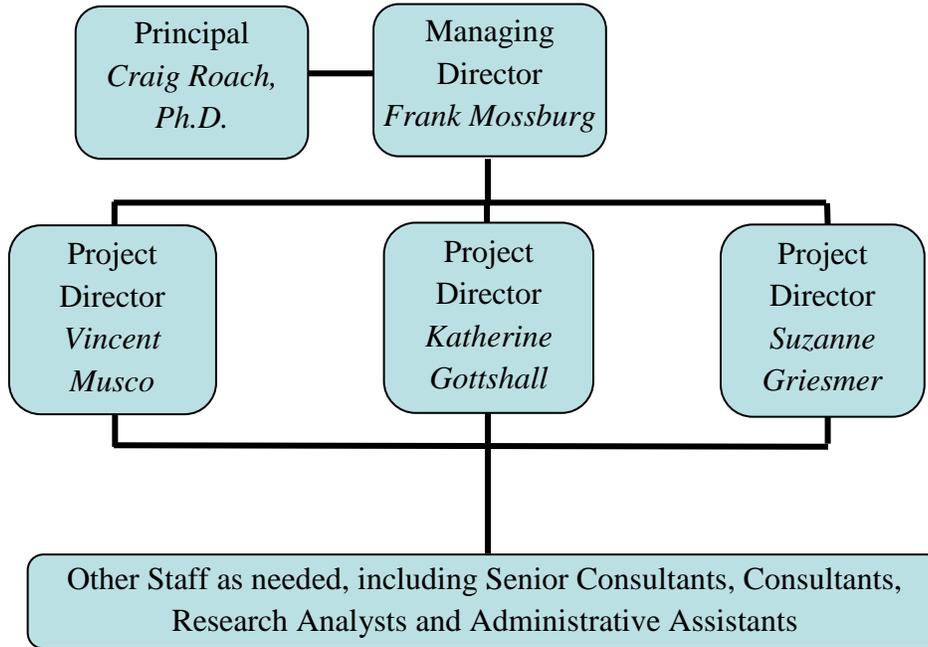
4. Maryland Public Service Commission

Reference: Bob Erwin, General Counsel
Telephone: (410) 767-8039
Email: rerwin@psc.state.md.us
Address: 6 St. Paul Street
Baltimore, MD 21202

5. Hawaii Public Utilities Commission

Reference: James Griffin, Chief Researcher
Telephone: (808) 586-2020
Email: james.p.griffin@hawaii.gov
Address: 465 South King Street #103
Honolulu, Hawaii 96813

III. The Boston Pacific Team



By hiring Boston Pacific, the LPSC would be engaging a full-services, multidisciplinary team of experts with almost 100 years of collective industry experience. This engagement requires more than just a single individual to help monitor the RFP and prepare expert testimony. Rather, the LPSC would be better served by an experienced consulting team including several experts with diverse backgrounds and abilities. Boston Pacific, with 29 years of experience in achieving tangible results for our clients on high-profile work, offers a team of experts.

The organizational chart above shows our approach to this engagement. Below, we provide quick descriptions of the team of experts that will serve the LPSC in this engagement. As is demonstrated, our team combines expertise in economics, finance, quantitative methods, engineering, and RTO market expertise. Full resumes and *curriculum vitae* are included in Appendix A, Section A of this proposal.

Dr. Craig Roach would be provide high level guidance and insight on topics such as the evaluation method, any issues with the bid receipt and evaluation, as well as a review of the public testimony. Dr. Roach is a nationally-recognized expert on the electricity business. He has served as an expert witness throughout North America, including before the LPSC. In total, Dr. Roach has testified or submitted comments to 25 State Commissions and the District of Columbia Commission and to FERC in more than 30 proceedings.

Frank Mossburg, Managing Director at Boston Pacific, would be responsible for the day-to-day operations of this project and would serve as point person for the LPSC Staff. He would both lead our efforts in monitoring the RFP as well as be the person to submit testimony. He brings his unique and extensive experience in electricity procurement design and implementation, resource planning, and resource evaluation. Frank leads our procurement monitoring work and develops our benchmark models that use RTO market prices to forecast

auction outcomes. Frank has appeared both formally and informally before several state commissions, testifying in cases such as our Oklahoma Wind case.

Katherine Gottshall, a Project Director, specializes in designing and monitoring electricity procurements, evaluating utility resource planning decisions, and data analysis. Her work at Boston Pacific has included monitoring over 100 procurements ranging from unit contingent RFPs to full requirements services. In addition, she has both testified and helped develop testimony for other Boston Pacific team members. In her prior position with the Quantitative Research Group at Cambridge Associates, she built sophisticated quantitative models, including Monte Carlo simulations and Markowitz's Efficient Frontier. Based on this experience, she will help in our monitoring and evaluation of the bids as well as assist Frank in preparing his testimony.

Vincent Musco, Project Director, would provide expert knowledge on RTOs. He brings over twelve years of experience in RTO market design, resource planning, cost recovery, and ISO integration. Vincent leads Boston Pacific's SPP work and led our audit work of Entergy Mississippi. Vincent is a recognized expert on RTO issues, having testified as an expert witness on multiple occasions, and spent over eight years as an Economist at FERC working on RTO market issues across the country. Based on this experience he will help advice on any issues regarding RTO issues as well as help in the drafting of testimony.

Suzanne Griesmer, Project Director, would provide knowledge and hands-on experience in both energy and gas markets, as well as extensive power project analysis and contract review. Her past work included close coordination with equipment manufacturers to evaluate optimal project designs using gas, biomass and landfill gas technologies. Her current work includes renewable unit contingent RFPs in California, as well as the longstanding BGS Auction in New Jersey. Based on this work, she would also provide assistance in the monitoring and evaluating of the bids.

As needed, Boston Pacific will draw on its Senior Consultants, Consultants and Research Analysts to efficiently serve the LPSC, helping specifically with the evaluation of bids as well as providing support to developing Boston Pacific's pre-filed testimony or audit memoranda.

IV. Work Plan and Estimated Timeline

Our work plan is comprised of two phases. In Phase One, we will monitor the RFP process to make sure it is fair and results in a signed contract with one or more renewable resources at reasonable rates. In Phase Two, we will participate in all stages of any certification application proceeding(s), in which the Commission will ultimately decide whether to approve (and allow rate recovery for) the company's renewable resource contract(s).

Before we provide our detailed plan of action, we first wanted to address the topic of "communication" – with both Commission Staff and Entergy – throughout all phases of our work. Regarding Commission Staff, we plan to maintain open and frequent communications by phone and email to keep them updated on progress with the RFP and to note any issues that arise. Regarding Entergy, we will seek to consult with the company throughout the evaluation

process, during bidder screening and bid verification, and prior to all key decisions (including bid rejection and short-list determination). In each of these steps we would suggest having a conference call with the company evaluators during which we offer our opinions and try to come to an agreement on the right course of action going forward. We have also provide an estimated timeline. This timeline is an estimate based on prior work experience and is likely to change depending on the speed of the negotiations and certification application process.

A. Work Plan

1. Phase One: Monitor Entergy's Renewables RFP

Task One: Review, comment on draft RFP documents *(Timeline - Contract start date to mid- April 2016)*

We will begin our work by reviewing and providing comments on the draft documents related to the Renewable Resources RFP. In doing this, we will focus on the RFP rules, the pro forma power purchase agreement (PPA) (assuming one is used) and other contract documents, and other documents related to the pre-qualification process and criteria, the evaluation methodology, and credit requirements. We will attempt to review the draft documents before the final version is released in advance of the mid-March bidder conference.

We will seek to ensure the fairness and the reasonableness of the RFP design and the process by which winner(s) are to be selected. We will work with Entergy to vet and refine the RFP's evaluation methodology. We will ensure fairness and "good utility practice" through confirming the following:

- The company designs the solicitation process, establishes evaluation criteria consistent with its overall IRP objectives, and specifies timelines;
- As part of the design process, that the company develops and specifies the type and form of threshold criteria that will apply to bidders. Examples of potential threshold criteria include requirements that bidders have site control, maintain a specified credit rating, and demonstrate that their proposed technologies are mature;
- The company has a formal process to respond to bidder's questions;
- The company provides bidders with access to information through a website where it can post documents and information, allowing all parties to have equal access.

Task Two: Advise on the RFP's evaluation methodology and review of the evaluation tools *(Timeline - Contract start date to mid- May 2016)*

One of the most important components of guaranteeing a fair and reasonable process is to ensure that the evaluation methodology is laid out clearly in the RFP in advance of the receipt of bids. The company should develop all bid evaluation criteria, bid selection guidelines, and the quantitative evaluation models and other information necessary for evaluating bids prior to issuance of the final RFP. We will advise the company with respect to the proposed evaluation methodology to ensure (a) that it is fair and (b) that it complies with the any and all Louisiana guidelines specifically the Market Based Mechanisms Order, the 1983 Order, and the Commission's Order No. I-33014 issued December 17, 2015.

We will also evaluate any quantitative models that the company plans to use to evaluate bids. This will ensure that the company is properly valuing bids to provide renewable energy and that it will treat all bidders equally, including any Entergy affiliates.

To provide some context on the sort of recommendations we would make on Entergy's evaluation methodology, we would look to ensure:

- That the evaluation is a “price-only” or “price mostly” evaluation, giving the most weight to the bidder who offers to lowest mix of price and risk for ratepayers. This is the most transparent for of procurement since bidders know that they can win by offering a low price. To that end the weights for each “non-price” criterion shall be fully specified by the company in advance of the submission of bids and weighted such that a majority of the bid score is based on price. Non-price factors include, for example, site control and experience in developing renewable generation projects.
- “Threshold” criteria – i.e. minimum requirements for participation - must be specified in advance of the RFP. Such threshold criteria may include, among other criteria, the following:
 - Project development feasibility criteria (e.g., siting status, ability to finance, environmental permitting status, commercial operation date certainty, engineering design, fuel supply status, bidder experience, and reliability of the technology);
 - Project operational viability criteria (e.g., operation and maintenance plan, financial strength, environmental compliance, and environmental impact);
 - Operating profile criteria (e.g., dispatching and scheduling, coordination of maintenance, operating profile such as ramp rates, and quick start capability); and
 - Flexibility criteria (e.g., in-service date flexibility, expansion capability, contract term, contract buy-out options, fuel flexibility, and stability of the price proposal).

- The RFP must specify the “price” data required of bidders that will be used in the company’s quantitative evaluation. Bidders’ specified prices can include a variety of costs and risks, including:
 - Capacity costs, energy costs, fixed and variable O&M, and maintenance;
 - Transmission interconnection and integration costs and system impacts;
 - The amount of purchased power that the company already has on its system and the impacts that increasing the amount of purchased power may have, both taken in terms of reliability and dispatchability.
- The RFP should consider ratepayer risk through sensitivities in the evaluation process (e.g. changes in natural gas prices). These sensitivities should reward bidders who assume more risk on behalf of the ratepayers.
- Additionally, the company should specify practical logistics of the evaluation—for example, the RFP must specify what constitutes a “non-conforming” bid and the criteria that will be used by the company to decide if a) it gives additional time to bidders to remedy their non-conformity, or b) it declines to consider the bid.

Task Three: Monitor technical and bidder conferences
(Timeline – mid March 2016)

We will monitor the bidder conference scheduled for mid-March. In addition, we will monitor any additional technical or bidder conferences held by the company, and, as needed we will make a presentation to explain our role. This will ensure bidders that an experienced third party is watching over the process and that they have an independent voice they can turn to if they have concerns. For budgeting purposes, we are assuming two bidder conferences held through a web-based teleconferencing platform, such as Webex that we will monitor.

Task Four: Review comments submitted by interested parties on the draft RFP and PPA/contract
(Timeline - Contract start date to mid- April 2016)

We would recommend that bidders have the option to file comments on the draft RFP and PPA/contract. This is common, good utility practice we see and use in many other state-run procurements across the country. We will review all comments that are submitted, as well as the process undertaken by the company to either accept or reject them. Prior to performing this review, we will ask the company to define the criteria that will be used to review the comments. We will suggest that changes be made to the RFP and PPA/contract if a) the proposed change would result in an improvement to the RFP or PPA/contract by either correcting a mistake or clarifying certain terms, b) the same change is being proposed by a substantial number of potential bidders, or c) the proposed change would improve the likelihood of receiving more bids.

Task Five: Monitor communications with bidders
(Timeline - Contract start date to Summer 2016)

To help ensure that all bidders are treated fairly, we will monitor the company's communication with bidders, including, for example:

- Responses to bidder questions: We will ensure that the company adheres to the process that was included in the RFP. In general, we expect that the process will provide for all questions and answers to be made available to all bidders, except for very limited situations where this might breach the confidentiality of the bidder's proposal.
- Communications to seek clarification on a bidder's proposal: We will suggest that, to the extent possible, communications to seek clarification on a bidder's proposal be conducted in writing, and will review such communications.
- Any other communications with bidders: We will ask the company to inform us if they need to have any other type of communication with bidders. We will monitor these interactions.

Task Six: Bid receipt and evaluation
(Timeline - Summer 2016)

On the day offers are due from interested parties, one person from our team will travel to the company's offices to monitor bid receipt in person. This ensures that all bids are received on time, opened at the same time, and that all materials are provided, and that no bidder is improperly eliminated or given an advantage, especially in the case of affiliate bidders.

Next, we will monitor the screening process by reviewing each bid's compliance with the threshold and eligibility requirements specified in the RFP. Should there be any deficiencies in any of the bids, we will work with the company to ensure that bidders clearly understand their deficiencies and, if applicable, are given a fair amount of time to address them. Here, as always, we will ensure that each bidder is treated equally, including any Entergy affiliates.

Next, we will monitor the evaluation of the bids to ensure that each bidder is treated fairly and that the evaluation is executed as promised in the RFP documents. Independently, we will conduct our own evaluation of the bids. We will then compare the company's results to our own. To do so, we will first independently score the bids on a price basis using a simplified in-house evaluation model, then score the bids on a non-price basis using the criteria specified in the RFP. This in-house evaluation will serve as an internal check to validate the company's evaluation results. We will address any inconsistencies between our results and those of the company before moving ahead. For budgeting purposes we will assume no more than ten bids.

Task Seven: Monitor contract negotiations
(Timeline – Late Summer to Early Fall 2016)

Ideally the winning bidder(s) will accept the template contract as is. However, in our experience, winning bidders typically look to make edits to the contract before executing it. Therefore, we will monitor contract negotiations by phone. Our purpose is to ensure that winning bidders are held to the price and performance assumptions in their bids—this will maintain the integrity of the RFP process and prevent any shifting of risk to the Entergy ratepayer.

2. Phase Two: Certification Application Proceeding(s)

In Phase Two, we will look to efficiently assist the Commission in reviewing and acting upon any certification application(s) filed by or on behalf of Entergy. Boston Pacific’s extensive experience in state regulatory proceedings – as both independent evaluators and monitors, as well as expert witnesses – will allow us to apply our tried-and-true approach to reviewing testimonies and exhibits, developing and reviewing data requests, developing and filing testimony, and standing for cross-examination. For budgeting purposes we assume one proceeding.

Task 8: Review any certification applications, testimonies, exhibits, and the company’s financial data
(Timeline - Fall 2016)

Boston Pacific will review the certification application(s), relevant testimonies, exhibits, and company’s financial data. We will have a head start on this process as we will have already reviewed and monitored the results of the RFP, making it easier to pinpoint any areas of concern. We will already know what the company plans to ask for and thus allowing us to read these documents for any nuances.

Task 9: Draft data requests and review responses
(Timeline – Fall 2016 to Winter 2016/17)

We will work with Staff to draft data requests to the company. We view this as a way to make sure all relevant information from the RFP process is on record as much of the data and analysis done in the RFP stage has likely not been provided publically. This will also aid in ensuring that the company acknowledges any additional information that might not be included in its testimony that would be helpful for either Staff or Boston Pacific’s testimony.

Task Ten: Participate in formal conferences, pre-trial conferences, depositions, and hearings
(Timeline – Winter 2016/17)

We will participate in any formal conferences, pre-trial conferences, depositions, and hearings that Staff deems necessary. In prior cases, we have frequently found that many issues

can be ironed out at this time in order to make the trial go smoothly. For budgeting purposes, we are assuming one eight hour pre-trial conference.

Task Eleven: Draft and prepare audit memoranda and/or pre-filed testimony with exhibits
(Timeline – Winter 2016/17 to Spring 2017)

We will draft and prepare an audit memoranda and/or a pre-filed testimony and exhibits. The purpose of our “testimony” is twofold: first, we will summarize the RFP process and evaluate its openness, fairness, and compliance with Commission directives; second, we will assess the certification application’s consistency with the public interest.

We will include a summary of our monitoring work and would contain our assessment and recommendations concerning the design of the RFP. The assessment will take into account the Commission’s goals and will include our certification to the Commission that the company’s judgments would create no unearned advantage for any specific participant for each of the following:

- Setting pre-qualification criteria
- Designing the RFP
- Designing the model PPA/contract to be attached to the RFP
- Designing the selection criteria

More broadly, we will assess whether the RFP design (a) is open, fair, and transparent, (b) recognizes and evaluates risk, and (c) lead to a successful result. We will also address the company’s conduct of the RFP in the context of compliance with all relevant Commission directives, including the Market Based Mechanisms Order, the 1983 Order, and the Commission’s Order No. I-33014 issued December 17, 2015. In our testimony we will recommend approval, conditional approval, or denial of the RFP results.

To make these assessments we will look for several factors. First, we will look for an evaluation process that is “price mostly.” In other words, the bidder who offers the lowest-priced unit should be the winner, barring major deficiencies. This means that the product should be precisely defined, all bidders should expect to sign roughly the same form of contract and bids should be selected on the basis of providing the lowest risk-adjusted cost to ratepayers, with non-price characteristics having less weight in the scoring. This form of evaluation is one of the most transparent forms of bid evaluation since bidders clearly understand how they can win the bid. Second, we will look to see that non-price evaluation criteria and methods are spelled out as clearly as possible, so that bidders understand how their bid will be judged. Third, we will look to make sure that there are no unnecessary barriers to entry which would damage the ultimate result. These barriers typically involve credits terms, either restrictions on creditworthiness of bidders or unnecessarily high performance assurance requirements. While most of our knowledge will come from our monitoring of the actual RFP process, there may be additional information we obtain through data requests posed to the company.

The testimony will also walk through the processes that were used to select the winning bidder(s). This includes documenting the results of all steps of the evaluation process. We will highlight if and how the selected portfolio differs from our independent analyses. If there is a difference between our results and the company's, we would audit, explain, and provide opinions on the source of that difference. Because we will have been in contact with Staff and company evaluators throughout the process there should be no segment of our testimony that comes as a surprise to either party.

We will also confirm that any of the winning resource's PPAs with Entergy are reasonable, not just because the RFP was run well, but because that resource is needed. This means that it is proved to be both economic and in the public interest.

Finally, we will respond as needed in our testimony to any issues raised in testimony or in pre-trial conferences, depositions, or any other forum by the company or other parties.

For budgeting purposes, we assume one direct testimony will be needed.

Task Twelve: Assist in drafting applicable motions, exemptions, briefing sheets and orders of the Commission
(Timeline – Spring 2017 to Summer 2017)

Finally, as is customary in our expert witnessing work in state regulatory proceedings, we will assist Staff as requested in drafting applicable motions, exemptions, briefing sheets and Commission Orders.

B. Estimated Timeline

The figure below shows Boston Pacific's estimated timeline for completion of the work in this RFP. Note that this is estimated and could vary depending on a number of factors.

Boston Pacific’s Estimated Timeline by Task

	Feb '16	Mar '16	Apr '16	May '16	Jun '16	Jul '16	Aug '16	Sept '16	Oct '16	Nov '16	Dec '16	Jan '17	Feb '17	Mar '17	Apr '17	May '17	Jun '17	Jul '17	Aug '17
1. Review, comment on draft RFP documents																			
2. Advise on the RFP's evaluation methodology and review of the evaluation tools																			
3. Monitor technical and bidder conferences																			
4. Review comments submitted by interested parties on the draft RFP and PPA/contract																			
5. Monitor communications with bidders																			
6. Bid receipt and evaluation																			
7. Monitor contract negotiations																			
8. Review any certification applications, testimonies, exhibits, and the company's financial data																			
9. Draft data requests and review responses																			
10. Participate in formal conferences, pre-trial conferences, depositions, and hearings																			
11. Draft and prepare audit memoranda and/or pre-filed testimony with exhibits																			
12. Assist in drafting applicable motions, exemptions, briefing sheets and order of the Commission																			

V. Cost Estimate

The tables below provide our hourly billing rates, consistent with the RFP’s requirements.¹³ In addition to hourly rates we provide time estimates for each of the twelve tasks listed above, which total to our estimated budget. The total estimate for this work is \$182,930, plus reasonable expenses. This is not meant to be a cap by task or by personnel. We are amenable to making this an overall cap but would not that it carries the assumptions stated above in our scope of work. Notably, we assume the RFP runs in accordance with our timeline and that the LPSC approval process consists of a single piece of testimony from our side.

Our approach offers several advantages to the LPSC. First, we will only bill for hours we work. Second, we will only work if authorized to do so by the LPSC Staff. Our planning sessions with the LPSC Staff will be essential to this approach. Third, we will be flexible. That means if the LPSC Staff asks us to spend more resources on one task than another, we will do so. Fourth, any increase in Boston Pacific’s rates during the term of the contract will require formal approval of the Commission, consistent with the requirements of the RFP.¹⁴ Fifth, we will provide monthly invoices which specifically identify and sufficiently describe all work performed, the person performing such work, the hourly rate, time and charge for such work, and will show the total amount billed to date, consistent with the requirements of the RFP.¹⁵ Sixth, expenses will be separately disclosed, along with proof of the expenses, will be consistent with the LPSC’s “Allowable Expenses,” and will not exceed 20 percent of the total amount of billed fees at any given time, consistent with the requirements of the RFP.¹⁶

¹³ “Estimate of Cost” page 4 of the RFP.

¹⁴ “Estimate of Cost” page 4 of the RFP.

¹⁵ “Billing Guidelines” page 5 of the RFP.

¹⁶ “Billing Guidelines” page 5 of the RFP.

TECHNICAL CONSULTANT BUDGET															
		Task One		Task Two		Task Three		Task Four		Task Five		Task Six		Task Seven	
		Review RFP Docs		Evaluation Methodology		Monitor Conferences		Review Bidder Comments		Bidder Communication		Bid Receipt & Evaluation		Monitor Contract Negotiation	
Category	\$/hour	Hours	\$	Hours	\$	Hours	\$	Hours	\$	Hours	\$	Hours	\$	Hours	\$
Principal	525	0	0	2	1,050	0	0	0	0	0	0	4	2,100	0	0
Managing Directors	360	10	3,600	20	7,200	4	1,440	4	1,440	4	1,440	30	10,800	0	0
Project Directors	270	20	5,400	50	13,500	4	1,080	20	5,400	20	5,400	60	16,200	16	4,320
Project Managers	225	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Senior Consultants	190	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consultants	170	0	0	20	3,400	0	0	20	3,400	0	0	10	1,700	16	2,720
Research Analysts	160	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Administrative Assistants	95	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total		30	9,000	92	25,150	8	2,520	44	10,240	24	6,840	104	30,800	32	7,040

		Task Eight		Task Nine		Task Ten		Task Eleven		Task Twelve		Total	
		Review Certification & Testimony		Data Requests		Conferences		Draft Testimony		Assist w/ motions, briefings, orders		Total	
Category	\$/hour	Hours	\$	Hours	\$	Hours	\$	Hours	\$	Hours	\$	Hours	\$
Principal	525	0	0	0	0	0	0	4	2,100	0	0	10	5,250
Managing Directors	360	16	5,760	8	2,880	8	2,880	60	21,600	10	3,600	174	62,640
Project Directors	270	30	8,100	20	5,400	8	2,160	80	21,600	20	5,400	348	93,960
Project Managers	225	0	0	0	0	0	0	0	0	0	0	0	0
Senior Consultants	190	0	0	0	0	0	0	0	0	0	0	0	0
Consultants	170	8	1,360	10	1,700	0	0	40	6,800	0	0	124	21,080
Research Analysts	160	0	0	0	0	0	0	0	0	0	0	0	0
Administrative Assistants	95	0	0	0	0	0	0	0	0	0	0	0	0
Total		54	15,220	38	9,980	16	5,040	184	52,100	30	9,000	656	182,930

* Direct expenses will be billed separately at cost as incurred consistent with the LPSC’s “Allowable Expenses” policy.

This is a total, not-to-exceed budget, not a task-by-task cap.

Task

1. Review, comment on draft RFP documents
2. Advise on the RFP's evaluation methodology and review of the evaluation tools
3. Monitor technical and bidder conferences
4. Review comments submitted by interested parties on the draft RFP and PPA/contract
5. Monitor communications with bidders
6. Bid receipt and evaluation
7. Monitor contract negotiations
8. Review any certification applications, testimonies, exhibits, and the company's financial data
9. Draft data requests and review responses
10. Participate in formal conferences, pre-trial conferences, depositions, and hearings
11. Draft and prepare audit memoranda and/or pre-filed testimony with exhibits
12. Assist in drafting applicable motions, exemptions, briefing sheets and order of the Commission

VI. Statement on Conflict of Interest

Boston Pacific does not have any conflicts of interest for this work. Boston Pacific does not represent any clients before the LPSC. As noted above, we have worked on behalf of other state Commissions in cases involving Entergy. However, Entergy was not our client in those engagements, and none of those engagements are currently active.

APPENDIX A:

**BOSTON PACIFIC'S MINIMUM CONSULTANT REQUIREMENTS AS REQUIRED
BY LPSC GENERAL ORDER DATED AUGUST 4, 2004**

A. Professional Resumes and Lists of Testimony and Publications

Craig R. Roach is the President and founder of Boston Pacific Company, Inc. He has 39 years of experience working on investments in, policies for, and litigation concerning the electricity and natural gas businesses, and other energy businesses. For 28 years at Boston Pacific, he has served the full range of stakeholders: public utility commissions, regional transmission organizations, competitive power suppliers, electric utilities, electric and gas marketers, gas pipeline companies, electric transmission companies, trade associations, government agencies, and energy consumers. Prior to founding Boston Pacific, he was an economist with the U.S. Congressional Budget Office and a Project Manager with ICF Incorporated, an energy and environmental consulting firm.

Craig is a nationally-recognized expert as evidenced by his submissions of testimony, affidavits, or comments to the U.S. Federal Energy Regulatory Commission in more than 30 proceedings, public utility commissions in 25 states plus the District of Columbia (some on multiple occasions), regulatory bodies in three Canadian provinces, in federal and state courts, and in arbitrations. A list of his submissions can be found at the link above. Also shown therein is a list of his speeches and articles.

Craig oversees all of Boston Pacific's work as an independent monitor or independent evaluator for electricity markets and competitive solicitations. Since 2004, Boston Pacific has served as an independent advisor to the Board of Directors of the Southwest Power Pool Regional Transmission Organization; much of this work has involved market design and market rules for the wholesale electricity markets. Boston Pacific also has served since 2004 as an independent monitor or evaluator for major competitive solicitations including those in the District of Columbia, Delaware, Hawaii, Illinois, Maryland, Mississippi, New Jersey, Ohio, Oregon, Pennsylvania, and elsewhere; in this work, Boston Pacific generally reports to the state regulatory commission.

Boston Pacific also serves as advisors on major new technology policies and procurements. Examples include evaluations for: (a) offshore wind for New Jersey; (b) major clean coal projects in both Mississippi and Illinois; (c) onshore wind generation in the Pacific Northwest, Oklahoma and elsewhere; (d) geothermal projects in Colombia, South America and in Hawaii; (e) a full range of advanced technologies for the U.S. Virgin Islands; (f) wind and geothermal projects for the U.S. DOE loan guarantee program; and (g) dozens of natural gas-fired combined cycle projects. Boston Pacific also has conducted substantial financial and market consulting for power investments throughout North America and in about two dozen countries around the world.

Craig earned his Ph.D. in economics from the University of Wisconsin and Bachelor of Science in economics, cum laude, from John Carroll University. He had served on the Advisory Board to the University of Wisconsin's Department of Economics.

**LIST OF TESTIMONY AND PUBLICATIONS BY
CRAIG R. ROACH, Ph.D.**

**LIST OF TESTIMONY AND OTHER PUBLICATIONS
FOR CRAIG R. ROACH, Ph.D.**

TESTIMONY

Responsive and Rebuttal Testimony concerning Oklahoma's Gas and Electric environmental compliance plan and power plant modernization plan. Oklahoma Corporation Commission Cause No. PUD 201400229. [December 2014, January 2015]. On behalf of the Commission's Public Utility Division.

Rebuttal Evidence concerning the review of the AUC's previous decision on transmission loss methodology. Alberta Utilities Commission Proceeding ID 2581. [September 2013]. Filed as an Expert Witness on behalf of the Generator Group.

Surrebuttal Testimony concerning our evaluation of the Fisherman's Atlantic City Wind Farm application to sell offshore renewable energy certificates. State of New Jersey Board of Public Utilities Docket No. E011050314V. [May 2013]. On behalf of the Board of Public Utilities Staff.

Direct Testimony concerning the allegation that the New Jersey Board of Public Utilities' Long-Term Capacity Agreement Pilot Program violates the Supremacy Clause and the Commerce Clause of the United States Constitution. U.S. District Court (District of New Jersey) Civil Action No. 11-745 PSG. [May 2013]. On behalf of the State of New Jersey, Department of Law and Public Safety, Division of Law.

Affidavit concerning FirstEnergy's Complaint related to underfunding of FTRs in PJM's Markets. Federal Energy Regulatory Commission Docket No. EL13-47-000. [March 2013]. On behalf of the Maryland Public Service Commission.

Direct Testimony concerning the allegation that the Maryland Public Service Commission's competitive procurement for long-term capacity violates the Supremacy Clause and the Commerce Clause of the United States Constitution. U.S. District Court (Maryland, Northern Division) Civil Action No. 12-1286 MJG. [March 2013]. On behalf of the Maryland Public Service Commission.

Responsive, Rebuttal and Surrebuttal Testimony concerning the application of the Public Service Company of Oklahoma for commission authorization of a plan and cost recovery for actions by PSO to be in compliance with certain environmental rules promulgated by the United States Environmental Protection Agency, Cause No. PUD 201200054. [January, February, and March 2013, respectively]. Filed on behalf of the Oklahoma Corporation Commission Staff and the Office of the Oklahoma Attorney General.

Responsive Testimony concerning whether Public Service Company of Oklahoma should be granted Contract Earnings on costs associated with a power purchase agreement, before the Corporation Commission of Oklahoma, Cause No. PUD 201200079. [September

2012]. Filed on behalf of the Oklahoma Corporation Commission Staff and the Office of the Oklahoma Attorney General.

Direct and Rebuttal Evidence concerning the Alberta Electric System Operator's approach to allocating transmission import capability, Alberta Utilities Commission, Proceeding 1633. [May and July 2012]. Filed on behalf of TransCanada Energy Ltd.

Summary at Hearing regarding whether new generating capacity is needed to meet long-term demand for Standard Offer Service, the Public Service Commission of Maryland, Case No. 9214. [January 2012]. Filed as Consultants to the Public Service Commission of Maryland.

Direct Testimony providing a recommendation to the Maryland Public Service Commission on whether to accept the results of the Maryland Utilities' 2012 Request for Proposals (RFP) for Standard Offer Service, the Public Service Commission of Maryland, Case Nos. 9056 and 9064. [October 2011, January 2012]. Filed on behalf of the Staff of the Public Service Commission of Maryland.

Opening Statement concerning Milner Power Inc.'s Transmission Loss Factor Rule and Loss Factor Methodology Complaint, Alberta Utilities Commission, Application No. 1606494, [October 2011]. Filed by TransCanada Energy Ltd.

Surrebuttal Testimony concerning Entergy Arkansas' proposal to become a member of Midwest ISO. Presented to the Arkansas Public Service Commission Case No. 10-11-U, [August 2011]. Filed as Expert Witness on behalf of Southwest Power Pool, Inc.

Written Evidence concerning Milner Power Inc.'s Transmission Loss Factor Rule and Loss Factor Methodology Complaint, Alberta Utilities Commission, Application No. 1606494, [July 2011]. Filed as Expert Witness on behalf of TransCanada Energy Ltd., TransAlta Corporation, and Capital Power Corporation.

Supplemental Initial Testimony concerning Entergy Arkansas' proposal to become a member of Midwest ISO. Presented to the Arkansas Public Service Commission Case No. 10-11-U, [July 2011]. Filed as Expert Witness on behalf of Southwest Power Pool, Inc.

Reply comments concerning the 2011 Procurement Process, before the Illinois Commerce Commission [July 2011]. Filed as the Procurement Monitor.

Affidavit concerning the proposed merger of Duke Energy Corporation and Progress Energy, Inc., Federal Energy Regulatory Commission Docket No. EC11-60-000 [June 2011]. [Client settled before filing.]

Direct Testimony providing a recommendation to the Maryland Public Service Commission on whether to accept the results of the Maryland Utilities' 2011 Request for Proposals (RFP) for Standard Offer Service, the Public Service Commission of Maryland, Case Nos. 9056 and 9064. [October 2010, January 2011, April 2011, June 2011]. Filed on behalf of the Staff of the Public Service Commission of Maryland.

Expert Report concerning HydroQuebec's calculations of ATC and its transmission planning process, Régie de l'énergie, No. R-3669-2008, Phase 2, [September 2010]. Filed on behalf of Énergie Brookfield Marketing, Inc.

Expert Report concerning rollover rights and curtailment under HydroQuebec's OATT, Régie de l'énergie, Nos. P130-001 and P130-003 [July 2010] Filed on behalf of Énergie Brookfield Marketing, Inc.

Reply comments concerning the 2010 Procurement Process, before the Illinois Commerce Commission [July 2010]. Filed as the Procurement Monitor.

Direct and Supplemental Testimony concerning the application of Oklahoma Gas and Electric Company to construct the Crossroads wind farm, Cause No. PUD 201000037 [June and July 2010]. Filed on behalf of The Oklahoma Corporation Commission.

Report on the Open Season for Zephyr Power Transmission LLC, Federal Energy Regulatory Commission, Docket No. ER09-433-000 [May 2010]. Filed as the Independent Evaluator for Zephyr Power Transmission, LLC.

Phase Two Report of the Independent Evaluator concerning proposed alternatives to Mississippi Power Company's IGCC facility, Docket No. 2009-UA-014 [January 2010]. Filed as Consultant to the Mississippi Public Service Commissioners.

Phase Two Direct Testimony concerning Mississippi Power Company's proposed IGCC facility, Docket No. 2009-UA-014 [December 2009]. Filed as Consultant to the Mississippi Public Service Commissioners.

Phase One Direct Testimony concerning Mississippi Power Company's petition for acquisition, construction, and operation of an Integrated Gasification Combined Cycle (IGCC) facility, Docket No. 2009-UA-014 [July 2009]. Filed as Consultant to the Mississippi Public Service Commissioners.

Responsive Testimony concerning the cost recovery and approval of a power purchase agreement between PSO and Exelon Generation, LLC, Oklahoma Corporation Commission Cause No. PUD 200900099 [July 2009]. Filed as the Oklahoma Commission's Independent Evaluator.

Reply comments concerning the 2009 Procurement Process, before the Illinois Commerce Commission [June 2009]. Filed as the Procurement Monitor.

Direct and Rebuttal Testimony concerning a service agreement between TransCanada Energy Ltd. and British Columbia Transmission Corporation for long term firm point-to-point transmission service. British Columbia Utilities Commission Project No. 3698539 [March and April 2009]. For TransCanada Energy Ltd.

Report responding to the Commission's inquiries on emissions costs, construction costs, and fuel costs, Minnesota Public Utility Commission Docket No. CN-05-619 [October 2008]. For the Minnesota Commission.

Testimony and Rebuttal Testimony concerning the design of the 2008 RFP, Oklahoma Corporation Commission Cause No. PUD 200700418 [June and August 2008]. Filed as the Oklahoma Commission's Independent Evaluator.

Comments concerning PacifiCorp's proposed acquisition of the Chehalis power plant, Oregon Public Utility Commission Docket No. UM 1374 [June 2008]. Filed as the Oregon Independent Evaluator.

Reply comments concerning the 2008 Procurement Process, before the Illinois Commerce Commission [May 2008]. Filed as the Procurement Monitor.

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Comments concerning PacifiCorp's proposal to amend and delay its 2012 RFP, Oregon Public Utility Commission Docket No. UM 1208. [November 2007]. Filed as the Oregon Independent Evaluator.

Affidavit concerning allegations of above-market prices and price manipulation in the 2006 Illinois Auction, Federal Energy Regulatory Commission Docket No. EL07-47-000. [June 2007]. Filed as the Auction Monitor.

Support for settlement of an electric transmission rate case, Federal Energy Regulatory Commission Docket No. ER06-186-000. [March and April 2006]. For the City of Vernon.

Testimony concerning market power mitigation measures for the Southwest Power Pool energy imbalance services market, Federal Energy Regulatory Commission Docket No. ER06-451-000. [January 2006]. Filed as the Southwest Power Pool's Independent Market Monitor.

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Direct and Supplemental Testimony concerning market power mitigation measures for the Southwest Power Pool energy imbalance services market, Federal Energy Regulatory Commission Docket No. ER05-1118-000. [June and August 2005]. Filed as the Southwest Power Pool's Independent Market Monitor.

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Direct Testimony regarding the benefit of continuing PUCT Capacity Auctions in Texas, Public Utility Commission of Texas, Docket No. 30882. [May 2005]. For Reliant Energy, Inc.

Expert Report regarding the basis for and quantification of damages, 249th Judicial District Court (Texas) Cause No. C-2002-00267. [March 2005]. For Ponderosa Pine Energy, L.L.C.

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Expert Report concerning damage estimates regarding power sales contract, American Arbitration Association Case No. 71 198 00323 01. [October 2004]. For Ponderosa Pine Energy Partners, LTD.

Panelist on solicitation processes for public utilities, Federal Energy Regulatory Commission Technical Conference Docket No. PL04-6-000, Washington, DC. [June 2004].

Affidavit and Supplemental Affidavit concerning the competitive effects of the proposed acquisition of Illinois Power by Ameren Corp., Federal Energy Regulatory Commission Docket No. EC04-81-000, Washington, DC. [May and June 2004]. For Aquila Merchant Services, Inc.

Direct Testimony on FirstEnergy's proposed Rate Stabilization Plan, Public Utilities Commission of Ohio Case No. 03-2144 EL-ATA, EL-AAM, EL-UNC. [February 2004]. For Reliant Resources, Inc. and Constellation Power Source.

Panelist on market power mitigation and measurement, Federal Energy Regulatory Commission Technical Conference on Supply Margin Assessment Screen and Alternatives Docket No. PL02-8-000, Washington, DC. [January 2004].

Direct and Answering Testimony concerning approval of affiliate power purchases by Entergy under the *Edgar* standard using a competitive solicitation test. Federal Energy Regulatory Commission Docket No. ER03-583-000. [November 2003 and April 2004]. For Calpine Corporation.

Direct and Answering Testimony and Cross-Answering Testimony concerning approval of an affiliate acquisition by AmerenUE under the *Edgar* standard using a competitive solicitation and benchmark data. Federal Energy Regulatory Commission Docket No. EC03-53-000. [August and September 2003]. For the Electric Power Supply Association.

Affidavit concerning the application of the *Mobile-Sierra* doctrine to a Standard Offer Wholesale Sales Agreement for a supplier in bankruptcy. United States District Court (District of Columbia) Case No. 03-1189. [July 2003]. For NRG Power Marketing Inc.

Direct Testimony concerning Entergy's proposed Agreement in Principle including certain affiliate power sales, New Orleans City Council Docket Nos. UD-01-04 and UD-03-01. [April 2003] For Reverend C.S. Gordon, Jr., et al.

Expert Report concerning correct interpretation of power sales contract standards, American Arbitration Association Case No. 71 198 00323 01. [April 2003] For Tenaska IV Texas Partners, LTD.

Expert Report concerning the correct discount rate to be used in determining an award, American Arbitration Association Case No. 00 199 00199 02. [March 2003]. For TM Delmarva Power L.L.C.

Affidavit concerning market-based rate authority using the Supply Margin Assessment (SMA), Federal Energy Regulatory Commission Docket No. ER03-618-000. [March 2003]. For Reliant Energy Choctaw, LLC.

Expert Report concerning opportunities for reverse tolling transactions with Entergy, utility dispatch rules, and antitrust damages, Louisiana State Court Suit No. 467,116; Div. "N". [January 2003]. For Energy Transfer Group.

Affidavit concerning market-based rate authority using the Supply Margin Assessment (SMA), Federal Energy Regulatory Commission Docket No. ER03-382-000. [January 2003]. For Reliant Energy Solutions, LLC.

Direct and Rebuttal Testimony concerning Track B issues including types of competitive solicitation, products to be procured, and affiliate codes of conduct, Arizona Corporation Commission Docket No. E-00000A-02-0051, et al. [November 2002]. For Panda Gila River, L.P.

Panelist concerning the Resource Adequacy Requirement within the Standard Market Design, Federal Energy Regulatory Commission Technical Conference Docket No. RM01-12-000, Washington, DC. [November 2002].

Affidavit concerning market-based rate authority using the Supply Margin Assessment (SMA), Federal Energy Regulatory Commission Docket No. ER03-81-000. [October 2002]. For Reliant Energy Solutions West, LLC.

Affidavit concerning the method for determining natural gas prices for purposes of calculating refunds in California, Federal Energy Regulatory Commission Docket Nos. EL00-95-045, et al. [October 2002]. For Reliant Energy Power Generation, Inc.

Direct and Surrebuttal Testimony concerning affiliate asset transaction and competitive procurement, Wisconsin Public Service Commission Docket No. 05-CE-117. [August and September 2002]. For Midwest Independent Power Suppliers.

Direct and Responsive Testimony concerning affiliate asset transfer and competitive procurement, Indiana Utility Regulatory Commission Cause No. 42145. [July and October 2002]. For Midwest Independent Power Suppliers.

Direct and Rebuttal Testimony concerning Track A issues including asset transfer, market power, and codes of conduct, Arizona Corporation Commission Docket No. E-00000A-02-0051, et al. [May and June 2002]. For Panda Gila River, L.P.

Affidavit concerning the triennial update for market-based rate authority using the Supply Margin Assessment (SMA), Federal Energy Regulatory Commission Docket No. ER01-3103-002. [June 2002]. For Reliant Resources, Inc.

Affidavit concerning market-based rate authority using the Supply Margin Assessment (SMA), Federal Energy Regulatory Commission Docket No. ER02-1762-000. [May 2002]. For Reliant Energy Solutions East, LLC.

Direct Testimony concerning Arizona Public Service Company's request for approval of variance and affiliate power purchase agreement, Arizona Corporation Commission Docket No. E-00000A-02-0051, et al. [March 2002]. For Panda Gila River, L.P.

Direct Evidence concerning a proposal for transmission congestion management and expansion cost allocation, Alberta Energy and Utilities Board Application No. 1248859. [March 2002]. For TransCanada Energy Ltd.

Direct Evidence concerning competitive procurement and pricing for transmission must-run and other ancillary services, Alberta Energy and Utilities Board Application No. 1244140. [February 2002]. For Ancillary Services Group.

Comments concerning market power mitigation by RTOs, Federal Energy Regulatory Commission Technical Conference on Standard Electricity Market Design Docket No. RM01-12-000, Washington, DC. [February 2002].

Direct Testimony concerning prices and other terms and conditions for imbalance energy from Entergy, Federal Energy Regulatory Commission Docket EL02-46-000. [January 2002]. For Generator Coalition.

Direct Testimony concerning energy market conditions and energy availability in New Orleans, City Council of New Orleans Docket No. UD-00-2. [January 2002]. For Thomas Lowenburg, et al.

Initial and Reply Comments concerning the development of market-based mechanisms to evaluate proposals to construct or acquire generating capacity, Louisiana Public Service

Commission Docket No. R-26,172. [December 2001 and January 2002]. For Sempra Energy Resources.

Expert Witness concerning abrogation of power sales agreement by Entergy, State of Alabama Circuit Court for Jefferson County, Civil Action Number CV9925070. [2001]. For Southern Company Services.

Direct Testimony and Supplemental Direct concerning the competitive effects of the proposed merger of Orion Power Holdings, Inc. and Reliant Resources Inc., Federal Energy Regulatory Commission Docket No. EC02-11-000. [October 2001 and January 2002]. For Applicants.

Comments and Request For Intervention concerning a proposed refund condition for market-based rates and methods of measuring market power, Federal Energy Regulatory Commission Docket No. EL01-118-000. [December 2001]. For Boston Pacific Company, Inc.

Comments concerning the role of market monitoring by RTOs, Federal Energy Regulatory Commission Conference on Electricity Market Design and Structure Docket No. RM01-12-000. [October 2001].

Affidavit concerning updated market power analysis in support of Carr Street Generating Station, L.P.'s market-based rate application, Federal Energy Regulatory Commission Docket No. ER98-4095-001. [October 2001]. For Orion Power Holdings, Inc.

Expert Report concerning calculation of damages due to a breach of contract, United States District Court (Eastern Texas) Case No. 1:00CV-283. [August 2001]. For EPCO Carbon Dioxide Products, Inc.

Direct Testimony concerning prudence of Wisconsin Electric Power Company's Power The Future-2 proposal, Public Service Commission of Wisconsin Docket No. 6630-DR-104. [June 2001]. For Midwest Independent Power Suppliers Coordination Group.

Direct Evidence Concerning Hydro Quebec's transmission rate application, Régie de L'Énergie Case R-3401-98. [February 2001]. For Ontario Power Generation, Inc.

Presentation of guiding principles for monitoring market power in markets run by the California ISO, Federal Energy Regulatory Commission Technical Conference Docket Nos. EL00-95-000, et al. [January 2001]. For the Electric Power Supply Association.

Affidavit concerning breach of contract by a utility and the resulting damages through the imposition of a cap on a rate discount known as the LEE Credit, Louisiana Public Service Commission Docket No. U-22801. [August 2000]. For Star Enterprise.

Direct, Supplemental Direct, Surrebuttal, and Rebuttal Testimony concerning the prudence of passing through the fuel adjustment clause certain electricity purchase costs and the costs of some utility-owned generation, New Orleans City Council Docket No. UD-99-2.

[April and December 2000; March and August 2001]. For Reverend C.S. Gordon, Jr., et al.

Direct and Rebuttal Testimony concerning the pricing of Reliability Must-Run (RMR) Service to the California ISO, Federal Energy Regulatory Commission Docket Nos. ER98-496-006 and ER98-2160-004. [December 1999 and March 2000]. For Duke Energy Power Services.

Direct, Rebuttal, and Rebuttal to Staff Testimony concerning the prudence of electricity purchase costs passed through the fuel adjustment clause and the underlying, inter-company procurement practices and methods of economic dispatch, Louisiana Public Service Commission Docket No. U-23356. [July and November 1999; July 2000]. For Linda Delaney, et al.

Affidavit concerning the competitive effects of the proposed merger of Sempra Energy and KN Energy, Inc., Federal Energy Regulatory Commission Docket No. EC99-48-000. [May 1999]. For Questar Pipeline Company.

Direct and Oral Rebuttal Testimony concerning the competitive effects of the proposed merger of AEP and CSW, Federal Energy Regulatory Commission Docket Nos. EC98-40-000, ER98-2770-000, and ER98-2786-000. [April 1999]. For The Dayton Power and Light Company.

Direct, Supplemental, and Rebuttal Testimony concerning a rate proposal for the Associated Branch Pilots of the Port of New Orleans, Louisiana Public Service Commission. [October 1998]. For the Associated Branch Pilots.

Direct and Rebuttal Testimony concerning claims for damages by Public Service of Colorado based on alleged improper billings under a power purchase agreement with Tri-State, American Arbitration Association No. 77 Y 181 00230 97. [September and October 1998]. For Tri-State Generation and Transmission Association, Inc.

Testimony concerning a public records request, 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana Suit No. 449,691 Div. "A". [August 1998]. For CII Carbon, L.L.C.

Direct, Cross-Answering, and Surrebuttal Testimony concerning standby rates for self-generators, Louisiana Public Service Commission Docket No. U-20925-SC. [June, July, and August 1998]. For CII Carbon, L.L.C.

Direct and Surrebuttal Testimony concerning reliability, market power, functional unbundling, divestiture, default supplier, balancing and other restructuring issues, New Jersey Board of Public Utilities Docket No. EX94120585Y, et al. [March and April 1998]. For Mid-Atlantic Power Supply Association.

Declaration concerning antitrust issues made by Florida Power in a motion for summary judgment, United States District Court (Miami, Florida) Case No. 96-594-CIV-LENARD. [February 1998]. For Metropolitan Dade County and Montenay Power.

Comments concerning market power, market structure, reliability, and related topics in restructuring, Arkansas Public Service Commission Docket Nos. 97-451-U, 97-452-U, and 97-453-U. [February 1998]. For Arkansas Electric Energy Consumers.

Direct, Rebuttal, and Surrebuttal Testimony concerning a methodology for determining avoided cost prices, Louisiana Public Service Commission Docket No. U-22739. [November and December 1997; January 1998]. For CII Carbon, L.L.C.

Direct Testimony concerning Virginia Power's proposals for stranded cost recovery, Virginia State Corporation Commission Case No. PUE 960296. [December 1997]. For Virginia Independent Power Producers, Inc.

Rebuttal Testimony concerning rules for affiliate transactions in the proposed merger of Pacific Enterprises and Enova Corporation, California Public Utilities Commission No. A.96-10-038. [August 1997]. For Kern River Gas Transmission Company.

Direct Testimony concerning the proposed merger of Pacific Enterprises and Enova Corporation, California Public Utilities Commission No. A.96-10-038. [August 1997]. For Kern River Gas Transmission Company.

Rebuttal Testimony concerning the calculation of damages for the Abrogation of Tenaska's power purchase agreement by BPA, American Arbitration Association No. 77-198-0224-95. [July 1997]. For Tenaska, Inc.

Testimony concerning Ex-Im Bank and OPIC, before the Subcommittee on Tax, Finance, and Exports, Committee on Small Business, U.S. House of Representatives. [May 1997].

Testimony concerning the abrogation of Tenaska's power purchase agreement by BPA, American Arbitration Association No. 77-198-0224-95. [February 1997]. For Tenaska, Inc.

Direct Testimony concerning rolled-in rates on Transco, Federal Energy Regulatory Commission Docket Nos. RP95-197-000 and RP95-197-001 (Phase II). [January 1996]. For KCS Energy Marketing, Inc.

Direct Testimony concerning estimates of avoided costs by Louisiana Power & Light, Louisiana Public Service Commission Docket No. U-21384. [October 1995]. For Calciner Industries, Inc.

Surrebuttal Testimony concerning estimates of avoided costs by Empire District Electric Company, Missouri Public Service Commission Case No. EC-95-28. [June 1995]. For Ahlstrom Development Corporation.

Affidavit concerning Duke's market power study, Federal Energy Regulatory Commission Docket No. ER95-760-000. [April 1995]. For North Carolina Municipal Power Agency Number 1 and Piedmont Municipal Power Agency.

Direct Testimony concerning estimates of avoided costs by Empire District Electric Company, Missouri Public Service Commission Case No. EC-95-28. [January 1995]. For Ahlstrom Development Corporation.

Direct Testimony concerning a proposal for rolled-in rates by Pacific Gas Transmission, Federal Energy Regulatory Commission Docket No. RP94-149-000. [November 1994]. For Alberta Department of Energy.

Direct Testimony concerning proposal for market-based rates under Rate-K, Michigan Public Service Commission Case No. U-10625. [October 1994]. For Michigan Cogeneration Coalition.

Preliminary Written Comments concerning the need for and form of a request for proposals (RFP) by Carolina Power & Light, South Carolina Public Service Commission Docket No. 94-469-E. [August 1994]. For Carolina Competitive Energy Producers.

Initial and Reply Comments concerning guidelines for evaluation of unsolicited private power proposals, North Carolina Utilities Commission Docket No. E-100, Sub 64. [September and October 1993]. For Carolina Competitive Energy Producers.

Direct Testimony concerning Section 712 issues, Florida Public Service Commission Docket No. 921288-EU. [September 1993]. For Florida Competitive Energy Producer's Association.

Oral Testimony concerning Section 712 issues, Maryland Public Service Commission Case No. 8568. [August 1993]. For Mid-Atlantic Independent Power Producers.

Direct Testimony concerning Section 712 issues, Georgia Public Service Commission Docket No. 4384-U. [July 1993]. For Electric Generation Association.

Direct Testimony concerning the proposed merger of Entergy and Gulf States, Federal Energy Regulatory Commission Dockets Nos. EC92-21-000 and ER92-806-000. [March 1993]. For Arkansas Electric Energy Consumers.

Direct Testimony concerning New York curtailment proposals, New York Public Service Commission Case Nos. 92-E-0814 and 88-E-081. [February 1993]. For J. Makowski Associates, Inc.

Direct Testimony concerning Georgia Power Company's Integrated Resource Plan, Georgia Public Service Commission Dockets No. 4131-U and 4134-U. [June 1992]. For Mission Energy Company.

Direct and Rebuttal Testimony concerning Baltimore Gas and Electric’s CPCN filing and Cogen Technologies’ proposed QF, Maryland Public Service Commission Case No. 8241-Phase II. [August and September 1991]. For Mission Energy Company.

Direct Testimony commenting on Jersey Central Power & Light Company’s request for proposals dated August 31, 1990, Docket No. 8010-678B. [December 1990]. For State of New Jersey Department of the Public Advocate [Co-sponsored].

Direct and Rebuttal Testimony concerning the sale/leaseback and restated agreement transaction for Springerville and San Juan power, Federal Energy Regulatory Commission Docket Nos. EL89-17-001 and EL89-18-001. [May and June 1990]. For Century Power Corporation.

Direct and Rebuttal Testimony concerning the proposed merger of Southern California Edison and San Diego Gas and Electric, Federal Energy Regulatory Commission Docket No. EC89-5-000. [November 1989 and January 1990]. For Century Power Corporation.

ARTICLES & SPEECHES

“Introduction to a Changing World: The Historical Context for the Commission’s Major Orders on Competitive Reform.” Presented to the Federal Energy Regulatory Commission as part of its Legacy Lecture Series (October 1, 2015).

“Does the AC Grid Still Provide What Customers Want?” Presented to PLATTS Transmission Planning and Development Conference (June 15, 2015).

“Overview of the 2015 Annual Looking Forward Report: Strategic Issues Facing the Electricity Business.” Presented to the SPP Board of Directors and Members Committee (April 28, 2015).

“Overview of the 2014 Annual Looking Forward Report: Strategic Issues Facing the Electricity Business.” Presented to the SPP Board of Directors and Members Committee (April 29, 2014).

“Strategic Issues Facing the Electricity Business.” Presented as part of a “Lunch and Learn” at the University of Chicago Booth School of Business (April 23, 2014).

Discussion of the recent federal preemption rulings in U.S. District Courts in Maryland and New Jersey. Presented as part of the Renewable Energy Webinar and Teleconference Series sponsored by ACORE and the ABA (March 19, 2014).

“Partnership, Not Preemption” (Coauthored) Public Utilities Fortnightly (December 2013).

“Brown Bag Presentation on Market Monitoring, Mitigation, and Competition.” Presented to The Office of Energy Policy and Innovation at the Federal Energy Regulatory Commission (May 22, 2013).

- “Overview of the 2013 Annual Looking Forward Report.” Presented to the SPP Board of Directors and Members Committee (April 30, 2013).
- “Overview of the Annual Looking Forward Report.” Presented to the SPP Board of Directors and Members Committee (April 24, 2012).
- “Using Competition to Benefit Consumers: An Implicit State-Federal Partnership.” Presented at Electricity Markets 101: An Overview of Electricity Market Structures, a Congressional briefing hosted by the Business Council for Sustainable Energy, the COMPETE Coalition, and the Electric Power Supply Association (October 5, 2011).
- “America’s Electricity Future: What Drives the Choice Among Technologies?” Presented at the Energy Project Series hosted by Haynes & Boone, LLP (September 22, 2011).
- “A Basic Electricity Primer.” Presented at the Natural Gas/Renewable Energy Dialogue on Grid Integration Issues hosted by NRECA (June 7, 2011).
- “Overview of the Annual Looking Forward Report.” Presented to the SPP Board of Directors and Members Committee (April 26, 2011).
- “America’s Energy and Climate Change Policy.” Published in *The Electricity Journal*, Volume 24, Issue 2, March 2011. ISSN 1040-6190.
- “Summary of Recommendations in our Report: a Review of the Southwest Power Pool’s Integrated Marketplace Proposal.” Presented to the Southwest Power Pool Board of Directors and Members Committee (January 25, 2011).
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Wisconsin.

Frank Mossburg is a Managing Director with more than 14 years of experience in the electricity business. He is an expert in electricity procurement design and implementation and resource planning and evaluation.

Frank leads our work in California as the Independent Evaluator for transactions from Pacific Gas & Electric. In this role he reviews formal solicitations and bilateral transactions to ensure that each process is generating the best results for PG&E ratepayers and complying with CPUC directives. He has lead the efforts on a) the RAM V and RAM VI RFOs, b) the ongoing CAES RFO, c) the renegotiation of a PPA between the PG&E and Noble Americas, and d) the bilateral sale from PG&E of Category I Energy and RECs.

Frank leads Boston Pacific's full requirements procurement monitoring in Ohio, New Jersey, Maryland, DC, Pennsylvania and Delaware. Frank works with utilities, commission staff, and bidders to design successful procurement processes and assess the competitiveness of bids. He is responsible for developing the technical analyses that are employed on these engagements, including creating price estimates with Boston Pacific's Benchmark Pricing Model. Frank has authored numerous reports and has appeared formally and informally before commissioners and staff in multiple jurisdictions to make recommendations regarding the acceptance of procurement results. He has submitted formal testimony in Minnesota regarding evaluation inputs, in Oklahoma regarding risk protections of power purchase agreements (PPA) versus utility-built plants, and in Maryland and Pennsylvania regarding procurement results.

Frank led Boston Pacific's work as the independent evaluator for the Oregon Commission for several RFPs from PacifiCorp. He oversaw all phases of each procurement, from analyzing and advising on the RFP design, to evaluating bids and observing contract negotiations. He appeared before the Oregon Commission on multiple occasions to provide recommendations regarding RFP design and resource selection. He also led Boston Pacific's analysis of PacifiCorp's request for a competitive bidding waiver to purchase the Chehalis plant.

Frank led Boston Pacific's efforts on Maryland's assessment of long-term reliability and subsequent RFP for long-term generating capacity. He was the lead author of a report assessing threats to state reliability and the commission's draft RFP, which resulted in a targeted procurement for in-state generation. He helped run the RFP, evaluate offers for compliance, designed and ran the bid evaluation and developed a recommendation regarding the winning supplier. After the winning bid was accepted, he coordinated complex multi-party negotiations regarding the RFP's Contract for Differences and developed a recommended set of changes to the contract. He also assisted in defending the process from challenges in Federal District Court by preparing an expert report.

Frank graduated, cum laude, from the Wharton Undergraduate School of the University of Pennsylvania with a Bachelor of Science in economics and a concentration in finance. He received his Master of Business Administration from the University of Virginia's Darden Graduate School of Business Administration.

**LIST OF TESTIMONY AND PUBLICATIONS BY
FRANK MOSSBURG**

**LIST OF TESTIMONY AND OTHER PUBLICATIONS
FOR FRANK MOSSBURG**

TESTIMONY

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Comments on PacifiCorp's Termination of the 2012 RFP Process. For the Oregon Public Utility Commission. Washington, DC, [March 2009].

Final Report of the Technical Consultant on Delmarva's 2008-2009 Request for Proposals for Full Requirements Wholesale Electric Power Supply to Delaware's Standard Offer Service Customers. For the Delaware Public Service Commission. Washington, DC, [February 2009].

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The Oregon Independent Evaluator's Assessment of PacifiCorp's 2008R-1 Renewables RFP Design. For the Oregon Public Utility Commission. Washington, DC, [July 2008].

An Analysis of PacifiCorp's Waiver Request for the Chehalis Power Generating Plant. For the Oregon Public Utility Commission. Washington, DC, [June 2008].

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Annual Final Report on the 2008 BGS FP and CIEP Auctions. For the New Jersey Board of Public Utilities. Washington, DC, [April 2008].

Final Report of the Technical Consultant on Delmarva's 2007-08 Request for Proposals for Full Requirements Wholesale Supply to Delaware's Standard Offer Service Customers. For the Delaware Public Service Commission. Washington, DC, [March 2008].

ARTICLES & SPEECHES

“Partnership, Not Preemption” (Coauthored) Public Utilities Fortnightly (December 2013).

“Recommendations for Statewide Default Service Procurement.” Presented to the Pennsylvania Procurement Collaborative Working Group (October 3, 2013).

Katherine Gottshall is a Project Director with over 12 years of experience, the majority of which is focused in the electricity industry. She specializes in designing and monitoring electricity procurements, evaluating utility resource planning decisions, and data analysis.

Katherine has extensive experience designing, monitoring, and implementing a wide range of competitive procurements. She has monitored over 100 procurements ranging from long-term baseload or renewable energy in Oklahoma and Illinois as well as short-term standard offer service (SOS), energy, capacity, or renewable energy credits (REC) in the District of Columbia, Delaware, Illinois, Maryland, Ohio, and Pennsylvania. Katherine also worked on a transmission capacity auction for TransCanada's merchant line open season. She developed many of Boston Pacific's in-house models used to evaluate these procurements, from models to verify and rank uniform bids to more complex models that assess all the details of unit-contingent bids. In addition, she provides valuable insight into the drivers of winning prices. Katherine regularly presents the results of SOS Request for Proposals (RFP) in DC and Maryland to the commissions in confidential sessions and has publicly testified before the Maryland Commission on the RFP results.

Katherine supports Boston Pacific's expert witnessing, from merger cases to utility planning decisions. Most recently, on behalf of the Oklahoma Attorney General and Oklahoma Corporation Commission staff, Boston Pacific assessed Public Service Company of Oklahoma's (PSO) settlement to comply with EPA's Regional Haze regulations. The scope of the settlement involved PSO installing less-expensive and less-effective emissions controls on one coal unit and retiring the other unit, rather than installing scrubbers on both its coal units. Katherine assessed PSO's Strategist modeling (their planning analysis tool) to determine the effectiveness of the settlement and how Boston Pacific should advise the commission. She monitored PSO's RFP to procure a 260 MW natural gas power purchase agreement (PPA) beginning in 2016, including participating in the final contract negotiations. Additionally, she reviewed the utility's IRP.

From 2007 to 2010, Katherine helped lead Boston Pacific's work as the independent market monitor for the Southwest Power Pool (SPP) Regional Transmission Organization (RTO). She co-authored SPP's annual State of the Market Report, including the first two annual reports after the start of the Energy Imbalance Service Market. Katherine analyzed hourly market load and pricing data for over a dozen balancing authorities to determine consistent patterns and particular areas of concern, generation and transmission outages and constraints, transmission expansion, and revenue adequacy for building new generation. This helped determine whether it would make sense to build new generation (and what type of generation) in SPP as a whole and in specific regions, especially those which tended to be more congested.

Katherine joined Boston Pacific from the Quantitative Research Group at Cambridge Associates, where she built sophisticated quantitative models, including Monte Carlo simulations and Markowitz's Efficient Frontier, to assess and measure returns and risk of investment portfolios. She received a Bachelor of Arts in mathematics and economics from Wellesley College.

**LIST OF TESTIMONY AND PUBLICATIONS BY
KATHERINE GOTTSALL**

LIST OF TESTIMONIES AND OTHER PUBLICATIONS FOR KATHERINE GOTTSHALL

TESTIMONY

Direct Testimony providing a recommendation to the Maryland Public Service Commission on whether to accept the results of the Maryland Utilities' 2016 Request for Proposals (RFP) for Standard Offer Service, the Public Service Commission of Maryland, Case Nos. 9056 and 9064. [October 22, 2015; February 4, 2016 – both with Frank Mossburg]. Filed on behalf of the Staff of the Public Service Commission of Maryland.

Direct Testimony providing a recommendation to the Maryland Public Service Commission on whether to accept the results of the Maryland Utilities' 2015 Request for Proposals (RFP) for Standard Offer Service, the Public Service Commission of Maryland, Case Nos. 9056 and 9064. [October 23, 2014; January 29, 2015; April 23, 2015; and June 11, 2015 – all with Frank Mossburg]. Filed on behalf of the Staff of the Public Service Commission of Maryland.

Direct Testimony providing a recommendation to the Maryland Public Service Commission on whether to accept the results of the Maryland Utilities' 2014 Request for Proposals (RFP) for Standard Offer Service, the Public Service Commission of Maryland, Case Nos. 9056 and 9064. [April 24, 2014 and June 12, 2014 – both with Frank Mossburg]. Filed on behalf of the Staff of the Public Service Commission of Maryland.

CONSULTING REPORTS

Post-Bid Report of the Procurement Monitor for Illinois Power Agency's November 2015 RFP to Procure Supplemental Photovoltaic RECs. For the Illinois Commerce Commission. Washington, D.C., [November 16, 2015]

Report of the Commission Consultant Regarding AEP Ohio's November 2015 Standard Service Offer Auction. Presented to the Public Utilities Commission of Ohio. Washington, D.C., [November 4, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's Fall 2015 RFP to Procure Distributed Generation Renewable Energy Credits. For the Illinois Commerce Commission. Washington, D.C., [October 12, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's September 2015 RFPs to Procure Standard Block Energy Products. For the Illinois Commerce Commission. Washington, D.C., [September 15, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's September 2015 RFP to Procure Zonal Resource Credits. For the Illinois Commerce Commission. Washington, D.C., [September 15, 2015]

Initial Comments on the 2015 Electric Procurement Events Pursuant to Section 16-111.5(o) of the Illinois Public Utilities Act. For the Illinois Commerce Commission. Washington, D.C., [June 29, 2015]

Post-Bid Report of the Procurement Monitor for Illinois Power Agency's June 2015 RFP to Procure Supplemental Photovoltaic RECs. For the Illinois Commerce Commission. Washington, D.C., [June 22, 2015]

Report of the Commission Consultant Regarding AEP Ohio's May 2015 Standard Service Offer Auction. Presented to the Public Utilities Commission of Ohio. Washington, D.C., [May 13, 2015]

Final Report of the Market Monitor on Potomac Electric Power Company's 2014-2015 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's Standard Offer Service Customers. For the DC Public Service Commission. Washington, D.C., [May 5, 2015]

Report of the Commission Consultant Regarding AEP Ohio's April 2015 Standard Service Offer Auction. Presented to the Public Utilities Commission of Ohio. Washington, D.C., [April 29, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's 2015 RFPs to Procure Solar Renewable Energy Credits. For the Illinois Commerce Commission. Washington, D.C., [April 20, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's Spring 2015 RFPs to Procure Standard Block Energy Products. For the Illinois Commerce Commission. Washington, D.C., [March 31, 2015]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's September 2014 RFPs to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [September 24, 2014]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's September 2014 RFPs to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [September 24, 2014]

Initial Comments on the 2014 Electric Procurement Events Pursuant to Section 16-111.5(o) of the Illinois Public Utilities Act. For the Illinois Commerce Commission. Washington, D.C., [June 5, 2014]

Final Report of the Market Monitor on Potomac Electric Power Company's 2013-2014 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's

Standard Offer Service Customers. For the DC Public Service Commission. Washington, DC. Washington, D.C., [June 3, 2014]

Report of the Commission Consultant Regarding AEP Ohio's May 2014 Standard Service Offer Auction. Washington, D.C., [May 7, 2014]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFP to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [April 30, 2014]

Report of the Commission Consultant Regarding AEP Ohio's February 2014 Standard Service Offer Auction. Washington, D.C., [February 26, 2014]

Final Report of the Market Monitor on Potomac Electric Power Company's 2012-2013 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's Standard Offer Service Customers. For the DC Public Service Commission. Washington, D.C., [June 13, 2013]

Reply Comments on the 2012 Procurement Process Pursuant to Section 16-115(o) of the Public Utilities Act. For the Illinois Commerce Commission. Washington, D.C., [June 28, 2012]

Comments on the 2012 Procurement Process Pursuant to Section 16-115(o) of the Public Utilities Act. For the Illinois Commerce Commission. Washington, D.C., [June 14, 2012]

Final Report of the Market Monitor on Potomac Electric Power Company's 2011-2012 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's Standard Offer Service Customers. For the DC Public Service Commission. Washington, D.C., [April 18, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFPs to Procure Renewable Energy Credits. For the Illinois Commerce Commission. Washington, D.C., [May 14, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFPs to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [April 30, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's 2012 Capacity RFP. For the Illinois Commerce Commission. Washington, D.C., [April 9, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFPs to Procure Renewable Energy Credits under the Rate Stabilization RFPs. For the Illinois Commerce Commission. Washington, D.C., [February 21, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFPs to Procure Standard Wholesale Energy Products under the Rate

Stabilization RFPs. For the Illinois Commerce Commission. Washington, D.C., [February 14, 2012]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's RFPs to Procure Renewable Energy Credits. For the Illinois Commerce Commission. Washington, D.C., [May 20, 2011]

Post-Bid Report of the Procurement Monitor for Commonwealth Edison Company's RFP to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [May 17, 2011]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's 2011 Capacity RFP (Phase II). For the Illinois Commerce Commission. Washington, D.C., [May 12, 2011]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's RFP to Procure Standard Wholesale Energy Products. For the Illinois Commerce Commission. Washington, D.C., [May 6, 2011]

Final Report of the Technical Consultant on Potomac Electric Power Company's 2010-2011 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's Standard Offer Service Customers. For the DC Public Service Commission. Washington, D.C., [May 4, 2011]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's RFP to Procure Capacity for June 2011. For the Illinois Commerce Commission. Washington, D.C., [April 14, 2011]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's & Commonwealth Edison's 2010 Long-Term Renewable Energy Resources RFPs. For the Illinois Commerce Commission. Washington, D.C., [December 13, 2010]

Review of the Taylorville Energy Center's Facility Cost Report. For the Illinois Commerce Commission. Washington, D.C., [June 2010]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Utilities' & Commonwealth Edison's 2010 Renewable Energy Credits RFPs. For the Illinois Commerce Commission. Washington, D.C., [May 20, 2010]

Post-Bid Report of the Procurement Monitor for the Ameren 2010 Energy RFP. For the Illinois Commerce Commission. Washington, D.C., [May 5, 2010]

Post-Bid Report of the Procurement Monitor for the Commonwealth Edison 2010 Standard Products RFP. For the Illinois Commerce Commission. Washington, D.C., [April 29, 2010]

Post-Bid Report of the Procurement Monitor for the Ameren Illinois Utilities 2010 Capacity RFP. For the Illinois Commerce Commission. Washington, D.C., [April 6, 2010]

Final Report of the Market Monitor on Potomac Electric Power Company's 2009-2010 Request for Proposals for Full Requirements Wholesale Supply to the District of Columbia's Standard Offer Service Customers. For the DC Public Service Commission. Washington, DC. Washington, D.C., [March 30, 2010]

Final Report of the Technical Consultant on Delmarva's 2009-10 Request for Proposals for Full Requirements Wholesale Supply to Delaware's Standard Offer Service Customers. For the Delaware Public Service Commission. Washington, D.C., [February 16, 2010]

Report of the Independent Evaluator in Docket No. 2009-UA-0014. For the Mississippi Public Service Commission. Washington, D.C., [January 25, 2010]

Comments on the 2009 Procurement Process Pursuant to Section 16-115(o) of the Public Utilities Act. For the Illinois Commerce Commission. Washington, D.C., [June 1, 2009]

Post-Bid Report of the Procurement Monitor for Ameren Illinois Utilities' 2009 Renewable Energy Credits RFP. For the Illinois Commerce Commission. Washington, D.C., [May 19, 2009]

Post-Bid Report of the Procurement Monitor for Commonwealth Edison's 2009 Renewable Energy Credits RFP. For the Illinois Commerce Commission. Washington, D.C., [May 12, 2009]

Post-Bid Report of the Procurement Monitor for the Ameren 2009 Energy RFP. For the Illinois Commerce Commission. Washington, D.C., [May 6, 2009]

2008 State of the Market Report, Southwest Power Pool, Inc. For the Southwest Power Pool Board of Directors. Washington, D.C., [May 5, 2009]

Post-Bid Report of the Procurement Monitor for the Commonwealth Edison 2009 Standard Products RFP. For the Illinois Commerce Commission. Washington, D.C., [April 30, 2009]

Post-Bid Report of the Procurement Monitor for the Ameren Illinois Utilities 2009 Capacity RFP. For the Illinois Commerce Commission. Washington, D.C., [April 14, 2009]

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Final Report of the Technical Consultant on Delmarva's 2008-09 Request for Proposals for Full Requirements Wholesale Supply to Delaware's Standard Offer Service Customers. For the Delaware Public Service Commission. Washington, D.C., [February 17, 2009]

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Two-Day Report of the Procurement Monitor for the Ameren Illinois Utilities' 2008 Renewable Energy Credits RFP. For the Illinois Commerce Commission. Washington, D.C., [April 16, 2008]

Two-Day Report of the Procurement Monitor for the Ameren Illinois Utilities 2008 Capacity RFP. For the Illinois Commerce Commission. Washington, D.C., [April 2, 2008]

Two-Day Report of the Procurement Monitor for the Ameren Illinois Utilities 2008 Energy RFP. For the Illinois Commerce Commission. Washington, D.C., [March 18, 2008]

Final Report of the Technical Consultant on Delmarva's 2007-08 Request for Proposals for Full Requirements Wholesale Supply to Delaware's Standard Offer Service Customers. For the Delaware Public Service Commission. Washington, D.C., [March 11, 2008]

Two Day Report of the Procurement Monitor for Commonwealth Edison's 2008 Standard Products RFP. For the Illinois Commerce Commission. Washington, D.C., [March 7, 2008]

Quarterly Metrics Report For the Southwest Power Pool (SPP) Energy Imbalance Services (EIS) Market. [July 20, 2007]

2006 State of the Market Report, Southwest Power Pool, Inc. For the Southwest Power Pool Board of Directors. Washington, D.C., [June 21, 2007]

April 2007 Monthly Metrics Report For the Southwest Power Pool (SPP) Energy Imbalance Services (EIS) Market [May 18, 2007]

March 2007 Monthly Metrics Report For the Southwest Power Pool (SPP) Energy Imbalance Services (EIS) Market [April 18, 2007]

February 2007 Monthly Metrics Report For the Southwest Power Pool (SPP) Energy Imbalance Services (EIS) Market. [March 27, 2007]

ARTICLES & SPEECHES

“Illinois Helps Spur New Distributed Solar Generation,” BPC In Brief, [August 13, 2015].

Vincent Musco is a Project Director with more than 13 years of experience in electric industry policy, market design, and market operations. Vincent began his career at FERC where he worked for eight years as an economist on market design issues in many of the organized markets in the United States, including California ISO, ISO New England, PJM, and New York ISO. Vincent's work at Boston Pacific has focused on market design through his work on behalf of the Southwest Power Pool (SPP), state commissions, and wholesale market participants.

Vincent was a leading member of the team that wrote Boston Pacific's report on Southwest Power Pool's Integrated Marketplace design. As part of this project, Vincent performed analysis on SPP's day-ahead market design, including resource adequacy issues, financial transmission rights, virtual bidding, creditworthiness requirements, settlements, and market monitoring. Vincent has consulted for SPP's Board of Directors on a variety of issues, including MISO market matters, demand response, distributed generation, bid cost recovery and resettlements, transmission cost allocation, retail electricity pricing, and compliance matters such as FERC's Order No. 1000 and Dodd-Frank legislation.

Vincent has served as an expert witness and provided expert testimony on a variety of energy market issues, such as transmission loss pricing in U.S. organized electricity markets, the economics of fuel and power purchases by a major U.S. utility, and open access transmission issues. Vincent has submitted expert testimony on behalf of both private and public clients and has testified before the Alberta Utilities Commission and the Mississippi Public Service Commission on multiple occasions, where he examined the coal, natural gas, oil, nuclear, and power procurement practices of Entergy Mississippi, including visiting coal-fired and gas-fired generation facilities, a transmission operations center, and energy trading floors. Vincent also led Boston Pacific's reliability audit of a major U.S. utility on behalf of FERC and the North American Electric Reliability Corporation (NERC), and helps lead Boston Pacific's practice monitoring open season solicitations for capacity on merchant transmission lines.

At Boston Pacific, Vincent has consulted state clients, including co-authoring a report on long-term contracting for renewable ocean energy in Maine, geothermal energy in Hawaii, and assisting in procurements for new generation capacity and other electricity projects in Illinois, Oklahoma, Maryland, and Ohio. Vincent has also supported other expert witnesses at Boston Pacific in developing testimony regarding merger and acquisition analysis, PJM's energy markets, U.S. rules on transmission open access, and financial transmission rights issues.

At FERC, Vincent worked on U.S. regional transmission organization (RTO) market rule and market design issues, including the California ISO, PJM, ISO New England, and New York ISO markets. While there, he was a trusted source of information and advice for FERC commissioners on market-related issues, such as backstop capacity procurement, virtual bidding, financial transmission rights, scarcity pricing, and market mitigation.

Vincent earned a Master of Arts in economics from American University and a Bachelor of Science in economics from James Madison University, with distinction.

**LIST OF TESTIMONY AND PUBLICATIONS BY
VINCENT MUSCO**

LIST OF TESTIMONY AND OTHER PUBLICATIONS FOR VINCENT MUSCO

TESTIMONY

Direct Testimony providing a recommendation to the Mississippi Public Service Commission on the results of The Independent Auditor's Report on the Annual Management Review Audit of Entergy Mississippi, Inc. for October 1, 2012 through September 30, 2014 [January 2015]. Provided on behalf of the Mississippi Public Service Commission.

Direct Testimony providing a recommendation to the Mississippi Public Service Commission on the results of The Independent Auditor's Report on the Annual Management Review Audit of Entergy Mississippi, Inc. [January 2013]. Provided on behalf of the Mississippi Public Service Commission.

Direct and Rebuttal Evidence and Oral Testimony concerning the Alberta Electric System Operator's approach to allocating transmission import capability, Alberta Utilities Commission, Proceeding 1633. [May, July, and September 2012]. Provided as Expert Witness on behalf of TransCanada Energy Ltd.

Direct Evidence and Oral Testimony concerning Milner Power Inc.'s Transmission Loss Factor Rule and Loss Factor Methodology Complaint, Alberta Utilities Commission, Application No. 1606494. [July and October 2011]. Provided as Expert Witness on behalf of Capital Power Corporation, TransCanada Energy Ltd., and TransAlta Corporation.

CONSULTING REPORTS

Report of the Commission's Consultant Regarding Duke Energy Ohio's November 2015 Standard Service Offer Auction. For the Public Utilities Commission of Ohio. Washington, D.C., [November 2015].

Report of the Commission's Consultant Regarding Dayton Power & Light's September 2015 Standard Service Offer Auction. For the Public Utilities Commission of Ohio. Washington, D.C., [September 2015].

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's and Commonwealth Edison Company's September 2015 RFPs to Procure Standard Block Energy Products. For the Illinois Commerce Commission. Washington, D.C., [September 2015].

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's September 2015

RFP to Procure Zonal Resource Credits. For the Illinois Commerce Commission. Washington, D.C., [September 2015].

Initial Comments on the 2015 Electric Procurement Events Pursuant to Section 16-111.5(o) of the Illinois Public Utilities Act. Presented to the Illinois Commerce Commission. Washington, D.C., [June 2015].

Report of the Commission's Consultant Regarding Duke Energy Ohio's May 2015 Standard Service Offer Auction. For the Public Utilities Commission of Ohio. Washington, D.C., [May 2015].

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's and Commonwealth Edison Company's 2015 RFPs to Procure Solar Renewable Energy Credits. For the Illinois Commerce Commission. Washington, D.C., [April 2015].

Southwest Power Pool Annual Looking Forward Report: Strategic Issues Facing the Electricity Business. For the Southwest Power Pool Board of Directors. Washington, D.C., [April 2015].

Post-Bid Report of the Procurement Monitor for Ameren Illinois Company's and Commonwealth Edison Company's Spring 2015 RFPs to Procure Standard Block Energy Products. For the Illinois Commerce Commission. Washington, D.C., [March 2015].

The Independent Auditor's Report on the Annual Management Review Audit of Entergy Mississippi, Inc. for October 1, 2012 through September 30, 2014. For the Mississippi Public Service Commission. Washington, D.C., [December 2014].

Report of the Commission's Consultant Regarding Dayton Power & Light's September 2014 Standard Service Offer Auction. For the Public Utilities Commission of Ohio. Washington, D.C., [September 2014].

Southwest Power Pool Annual Looking Forward Report: Strategic Issues Facing the Electricity Business. For the Southwest Power Pool Board of Directors. Washington, D.C., [April 2014].

Southwest Power Pool Annual Looking Forward Report. For the Southwest Power Pool Board of Directors. Washington, D.C., [April 2013].

The Independent Auditor's Report on the Annual Management Review Audit of Entergy Mississippi, Inc. For the Mississippi Public Service Commission. Washington, D.C., [December 2012].

Southwest Power Pool Annual Looking Forward Report. For the Southwest Power Pool Board of Directors. Washington, D.C., [April 2012].

Review of Terms and Conditions for Long-Term Contracts for Renewable Ocean Energy. For the Governor’s Office of Energy Independence and Security for the State of Maine. Washington, D.C., [April 2012].

Commentary on Equity in Benefits, Costs, and Unintended Consequences of Transmission Investment and Expansion (Confidential). For the Southwest Power Pool Board of Directors. Washington, D.C., [February 2012].

Findings and Recommendations of the Independent Audit Firm on Compliance with the Stipulation and Consent Agreement (Confidential). For the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation. Washington, D.C., [September 2011].

Southwest Power Pool Annual Looking Forward Report. For the Southwest Power Pool Board of Directors. Washington, D.C., [April 2011].

Summary of Discussion Regarding Boston Pacific’s Integrated Marketplace Recommendations. For the Southwest Power Pool Board of Directors. Washington, D.C., [March 2011].

A Review of the Southwest Power Pool’s Integrated Marketplace Proposal. Jointly for the Southwest Power Pool Board of Directors. Washington, D.C., [December 2010].

ARTICLES & SPEECHES

“Overview of the Open Solicitation Process for the New England Clean Power Link.” Presented at the Webex Information Session for TDI New England’s Open Solicitation for the New England Clean Power Link, Washington, DC, [November 2015].

“Illinois Helps Spur New Distributed Solar Generation,” BPC In Brief, [August 2015].

“Are Decentralized Resources an Existential Competitive Threat to the Grid?” BPC In Brief, [May 2015].

“Southwest Power Pool 2015 Annual Looking Forward Report: Strategic Issues Facing the Electricity Business.” Jointly presented to the Southwest Power Pool Board of Directors and Members Committee, Tulsa, OK, [April 2015].

“Preliminary Overview of the 2015 Looking Forward Report: Strategic Issues Facing the Electricity Business.” Jointly presented to the Southwest Power Pool Board of Directors Oversight Committee, Washington, D.C., [March 2015].

“Back to Basics on Demand Response Compensation,” BPC In Brief, [October 2014].

“Overview of the 2014 Annual Looking Forward Report: Strategic Issues Facing the Electricity Business.” Jointly presented to the Southwest Power Pool Board of Directors and Members Committee, Oklahoma City, OK, [April 2014].

“Preliminary Overview of the 2014 Looking Forward Report: Strategic Issues Facing the Electricity Business.” Jointly presented to the Southwest Power Pool Board of Directors Oversight Committee, Washington, D.C., [March 2014].

“Partnership, Not Preemption” (Coauthored) Public Utilities Fortnightly (December 2013).

“Brown Bag Presentation on Market Monitoring, Mitigation, and Competition.” Jointly presented to The Office of Energy Policy and Innovation at the Federal Energy Regulatory Commission, Washington, D.C., [May 2013].

“Overview of the 2013 Annual Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors and Members Committee, Kansas City, MO, [April 2013].

“Preliminary Overview of the 2013 Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors Oversight Committee, Washington, D.C., [March 2013].

“Overview of the Annual Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors and Members Committee, Oklahoma City, OK, [April 2012].

“Overview of the Annual Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors Oversight Committee, Washington, D.C., [March 2012].

“A Basic Electricity Primer.” Jointly presented at Natural Gas / Renewable Energy Dialogue on Grid Integration Issues, Arlington, VA, [June 2011].

“Overview of the Annual Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors and Members Committee, Tulsa, OK, [April 2011].

“Status Report on the Integrated Marketplace Proposal.” Jointly presented to the Southwest

- Power Pool Board of Directors Oversight Committee, Washington, D.C., [April 2011].
- “Overview of the Annual Looking Forward Report.” Jointly presented to the Southwest Power Pool Board of Directors Oversight Committee, Washington, D.C., [April 2011].
- “Summary of Recommendations in Our Report: A Review of the Southwest Power Pool’s Integrated Marketplace Proposal.” Jointly presented to the Southwest Power Pool Board of Directors, New Orleans, LA, [January 2011].
- “Technical Conference Regarding California Independent System Operator Corporation’s Exceptional Dispatch Mechanism and Proposed Mitigation Plan.” FERC Staff Moderator at Technical Conference at the Federal Energy Regulatory Commission, Washington, D.C., [November 2008].
- “Reliability Standard Compliance and Enforcement in Regions with Independent System Operators and Regional Transmission Organizations.” FERC Staff Panel Member at Technical Conference at the Federal Energy Regulatory Commission, Washington, D.C., [September 2007].
- “Technical Conference Regarding Parameters for New York Independent System Operator’s Installed Capacity Requirement Demand Curve.” FERC Staff Panel Member at Technical Conference at the Federal Energy Regulatory Commission, Washington, D.C., [March 2005].
- “Staff Presentation Concerning the Cross Sound Cable and 1385 Cables Settlement between the Northeast Utilities Service Company, Connecticut Light & Power, and the Long Island Power Authority.” FERC Staff Joint Presenter at Open Meeting of the Federal Energy Regulatory Commission, Washington, D.C., [June 2004].

B. Representative Client List

Boston Pacific is a specialized consulting firm serving the electricity and natural gas sectors. For 28 years we have provided responsive and insightful service to our public and private clients. Our clients include state regulatory commissions, trade associations, regional transmission organizations, energy consumers, competitive power suppliers, electric utilities, gas pipeline companies, and government agencies.

We are nationally-recognized experts on the electricity business, as documented by our service as expert witnesses in litigation, arbitration, and regulatory proceedings throughout North America. Boston Pacific is also an industry leader in designing and monitoring major power procurements of every type for state commissions across the country, as well as open seasons for merchant transmission lines. In addition, Boston Pacific has extensive, hands-on experience with a full range of power technologies including clean coal, on- and off-shore wind, geothermal, waste-to-energy, solar photovoltaics, and natural gas-fired combined-cycle. We are located in Washington, D.C.

The following list of representative clients provides a look at the breadth of our experience.

Ahlstrom Development Corporation	Florida Competitive Energy Producers Association
Alberta Department of Energy	Generator Coalition
Ancillary Services Group	GPU International
Aquila Merchant Services, Inc.	Hawaii Public Utilities Commission
Arkansas Electric Energy Consumers	Illinois Commerce Commission
Associated Branch Pilots	J. Makowski Associates, Inc.
Calceiner Industries, Inc.	KCS Energy Marketing, Inc.
California Public Utilities Commission	Kern River Gas Transmission Company
Calpine Corporation	Louisiana Public Service Commission
Capital Power Corporation	Maryland Public Service Commission
Carolina Competitive Energy Producers	Metropolitan Dade County
Century Power Corporation	Michigan Cogeneration Coalition
CII Carbon, LLC	MidAmerican Energy Company
City of Vernon, California	Mid-Atlantic Independent Power Producers
Constellation Power Source	Mid-Atlantic Power Supply Association
Dayton Power and Light Company	Midwest Independent Power Suppliers
Delaware Public Service Commission	Midwest Independent Power Suppliers
Delmarva Power & Light Company VSCC	Coordination Group
District of Columbia Public Service Commission	Minnesota Public Utilities Commission
Dorilton Capital Advisors LLC	Mission Energy Company
Duke Energy Power Services	Mississippi Public Service Commission
Electric Generation Association	Montenay Power
Electric Power Supply Association	Nevada Hydro Co.
Energie Brookfield Marketing, Inc.	New Jersey Board of Public Utilities
Energy Transfer Group	NJ Office of the Attorney General
EPCO Carbon Dioxide Products, Inc.	North American Electric Reliability Corporation
Federal Energy Regulatory Commission	

North Carolina Municipal Power Agency
NRG Power Marketing, Inc.
Oklahoma Attorney General
Oklahoma Corporation Commission
Ontario Power Generation, Inc.
OPIC
Oregon Public Utility Commission
Orion Power Holdings, Inc.
Pacific Gas and Electric Company
Panda Gila River, L.P.
Pennsylvania Public Utility Commission
Piedmont Municipal Power Agency
Ponderosa Pine Energy Partners, Ltd.
Public Utilities Commission of Ohio
Public Utility Commission of Texas
Puerto Rico Energy Commission
Questar Pipeline Company
Reliant Energy
Sempra Energy Resources
South Carolina Public Service Authority
Southern Company Services
Southwest Power Pool
Star Enterprise
State of Maine Governor's Office of Energy
Independence and Security
TDI New England
Tenaska Inc.
TM Delmarva Power, LLC
TransAlta Corporation
TransCanada Energy Ltd
Tri-State Generation and Transmission
Association, Inc.
U.S. Trade and Development Agency
US Department Of Energy
Virgin Islands Power and Water Authority
Virginia Independent Power Producers, Inc.
West Penn Power
Zephyr Power Transmission, LLC

C. Liability Insurance Face Sheet



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
11/19/2015

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER CNR Insurance Inc. 166 West Street Annapolis MD 21401		CONTACT NAME: Traci Eagles PHONE (A/C, No, Ext): (410) 897-9890 FAX (A/C, No): (410) 897-5957 E-MAIL ADDRESS: traci@cnrinsurance.com															
INSURED BOSTON PACIFIC CO., INC. 1100 NEW YORK AVE NW, #490 EAST WASHINGTON DC 20005		<table border="1"> <tr> <th>INSURER(S) AFFORDING COVERAGE</th> <th>NAIC #</th> </tr> <tr> <td>INSURER A Hartford Casualty Insurance Company</td> <td>29424</td> </tr> <tr> <td>INSURER B Hartford Ins Co of the Midwest</td> <td>00914</td> </tr> <tr> <td>INSURER C Houston Casualty Co</td> <td></td> </tr> <tr> <td>INSURER D:</td> <td></td> </tr> <tr> <td>INSURER E:</td> <td></td> </tr> <tr> <td>INSURER F:</td> <td></td> </tr> </table>		INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A Hartford Casualty Insurance Company	29424	INSURER B Hartford Ins Co of the Midwest	00914	INSURER C Houston Casualty Co		INSURER D:		INSURER E:		INSURER F:	
INSURER(S) AFFORDING COVERAGE	NAIC #																
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INSURER D:																	
INSURER E:																	
INSURER F:																	

COVERAGES **CERTIFICATE NUMBER:** 15-16 Master **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:			30SBAK05620	8/21/2015	8/21/2016	EACH OCCURRENCE \$ 2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 2,000,000 GENERAL AGGREGATE \$ 4,000,000 PRODUCTS - COMPOP AGG \$ 4,000,000 Territory Factor \$
A	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS			30SBAK05620	8/21/2015	8/21/2016	COMBINED SINGLE LIMIT (Ea accident) \$ 2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input checked="" type="checkbox"/> RETENTIONS \$ 10,000			30SBAK05620	8/21/2015	8/21/2016	EACH OCCURRENCE \$ 1,000,000 AGGREGATE \$ \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	30WECCT5265	8/21/2015	8/21/2016	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
C	Professional Liability			H71218415	10/20/2015	10/20/2016	Limit Per Claim \$5,000,000 Deductible \$15,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Proof of Insurance

CERTIFICATE HOLDER Boston Pacific Co, Inc. 1100 New York Ave NW #490 East Washington, DC 20005	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE Brenda Hicks/BRENDA <i>Brenda Hicks</i>
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ACORD 25 (2014/01)
INS025 (201401)

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