

RFP 22-9 Docket No. X-36125

Proposal to Perform an Audit of

**Fuel Adjustment Clause (FAC) Filings for
Southwestern Electric Power Company for
the Period of January 2019 through December
2020**

February 10, 2022



Vantage Energy Consulting, LLC

Management Consulting and Energy Services

February 10, 2022

Kimberly N. O'Brian
Kathryn H. Bowman
Louisiana Public Service Commission
602 North Fifth Street (Galvez Building) (70802)
PO Box 91154
Baton Rouge, LA 70821-9154

Dear Ms. O'Brian and Ms. Bowman:

Vantage Energy Consulting LLC., (Vantage) is pleased to respond to your Request for Proposal to provide audit services in the matter of the Fuel Adjustment Clause Filings for Southwestern Electric Power Company (SWEPCO) for the Period of January 2019 through December 2020. (Docket No. X-36125). This is Proposal provides a complete response to all requirements in the RFP.

In preparing our Proposal, we wish to emphasize our willingness to work with the Commission and the Legal and Audit Divisions to reach the required results in an efficient, cost effective and non-intrusive manner. Our firm is staffed by professional consultants who have conducted twenty-two similar assignments with great success. Our contact information is:

Vantage Energy Consulting LLC
20844 4th Ave. West
Cudjoe Key, FL 33042
Tel.: 305-744-3440; Fax: 305-744-3450; Cell: 305-394-0784
E-mail: wdrabinski@vantageenergyconsulting.com
Web Site: www.vantageenergyconsulting.com

All the information in this proposal is accurate. Further, Vantage is committed and able to perform all the work contained in the proposal. Vantage is in compliance with all RFP requirements.

Vantage commits to analyze, interpret and make specific recommendations with respect to the structure, policies and procedures of SWEPCO 's power purchases, fuel procurement and utilization and related functions. The audit will include an examination of all operational and managerial aspects of the fuel management practices as well as SWEPCO's portfolio of fuel and purchased power contracts.

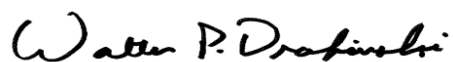
Vantage Energy Consulting LLC will stand behind our findings, conclusions, and recommendations. Vantage will comply with all applicable local and state ordinances. As



evidenced by my signature below, I certify that all of the information in this proposal is accurate.

Please note, Vantage is listed by the Federal Government as an Economically Disadvantaged Woman Owned Small Business (EDWOSB) and Certified by the State of Florida as a Women Business Enterprise (WBE).

Sincerely,



Walter P. Drabinski, President



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A. VANTAGE ENERGY CONSULTING LLC BACKGROUND

This section describes the Vantage Energy Consulting, LLC business organization and the team that will be assigned to this project.

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VANTAGE DESCRIPTION

Vantage Energy Consulting LLC, (Vantage) is a management consulting firm headquartered in Cudjoe Key, Florida, with clients throughout North America. Vantage consultants possess a broad background in all business aspects of electric, gas, and water utilities, but retain particular expertise in utility operating functions. Vantage Energy Consulting LLC and its predecessor company, Vantage Consulting Inc., has been in existence for over 30 years. During that time, the firm has focused on conducting utility related management consulting assignments. As the details on specific assignments described in the balance of this proposal show, Vantage has extensive experience with power plant operations, fuel procurement, fuel adjustment clauses, reliability monitoring, system sales and purchases, and regional system dynamics.

The Vantage team consists of highly experienced, trained consultants, covering virtually all functional work areas within the utility industry. Vantage is staffed by a total of 12 full-time and contract consultants and administrative staff. Consultants have a diverse set of backgrounds, including engineering, accounting, economics, finance, and psychology.

Vantage provides a broad range of consulting services to investor-owned utilities, independent power producers, regulatory agencies, state planning and environmental agencies, and law firms. While the majority of our assignments are tailored to the specific needs of the client, there are specific products and services which we offer. The functional service areas in which we work, and the consulting topics to which we provide expertise, are listed below.

STAFF RELATIONSHIPS AND WORK LOCATION

All personnel proposed for this assignment are employees of Vantage. Vantage employees generally work out of home offices, although there is a full office at Cudjoe Key for senior



management and staff. The percentage of work performed in Louisiana, either at SWEPCO offices or at the Commission offices will be based on Covid related travel restrictions. Should restrictions be lifted, we would anticipate 50% of our work being performed onsite.

HISTORICAL VANTAGE ASSIGNMENTS

The following table summarizes the projects Vantage and many of the current core employees have worked on over the last two plus decades. These include a total of 24 different assignments that included a review of fuel procurement. In addition, Vantage and its consultants have performed direct work for many utilities as well. Currently, Vantage is assisting Lake Worth Energy in developing its own energy and capacity procurement contracts after years of purchasing through a neighboring utility. The projects highlighted in red in the following table were fuel procurement related.

Company	Project	Type of Assignment
Allegheny Power Systems	Fuel Procurement Review	Focused Audit
Alstom Development	Cogeneration Development	Management Audit
Ameritech	Review of merger savings	Utility Consulting
Ameren Illinois	Emergency response planning and development	Management Audit
American Water-New Jersey	Operations Audit	Management Audit
Aqualectra	Management Audit	Management Audit
Belize Electric Limited	Process Improvement	Utility Consulting
Bell Atlantic – New Jersey	Developed a cost activity analysis	Utility Consulting
BellSouth Services	Reviewed marketing opportunities for technical services	Utility Consulting
BellSouth	Review of customer service and financial systems	Utility Consulting
Central Hudson Electric and Gas	Management Audit - - included fuel procurement review	Management Audit
Choptank Electric Cooperative	Organizational Review	Management Audit
City of Colorado Springs Utilities	Operations Improvement Project	Focused Audit
City of Corpus Christi	Process Reengineering	Focused Audit
Cleveland Electric Illuminating	Fuel Procurement Review	Focused Audit
Columbia Gas of Maryland	Fuel Procurement Review	Focused Audit
Columbia Gas of Ohio	Credit and Collections Review	Focused Audit
Columbus Southern Company	Fuel Procurement Review	Focused Audit
Commonwealth Edison	Outage and Reliability	Focused Audit
Consolidated Edison	Audit of emergency response	Focused Audit



Contel California (Verizon)	Attestation Examination	Management Audit
Contel Service Corporation	Mgmt. and financial information systems rollouts.	Utility Consulting
Curoil	Management Audit	Management Audit – includes fuel procurement
Dayton Power & Light Company	Fuel Procurement Review	Focused Audit
Dominion East Ohio	Credit and Collections Audit	Focused Audit
Duke Energy Ohio	Credit and Collections Review	Management Audit
Duquesne Light Company	Comprehensive Operations Review	Management Audit
Entergy Corporation	Fuel Procurement Audit	Focused Audit
Edmonton Power	Power plant work management system implementation	Utility Consulting
Entergy Corporation	Affiliate Transactions Review	Focused Audit
East Kentucky Power Cooperative	Fuel Procurement Review	Focused Audit
El Paso Natural Gas Company	Business Unit Reorganization, Reengineering	Utility Consulting
FERC	California Energy Crisis – Audit of ISO	Focused Audit
General Waterworks Company	Comprehensive Operations Review	Management Audit
GTE of California	Attestation Examination	Focused Audit
Grayson Electric	Grayson Management Audit	Management Audit
Hampton Roads, Va. Planning Com.	Emissions Credits Banking Strategy	Utility Consulting
Houston Light and Power	Nuclear Prudence Review	Utility Consulting
Indianapolis Power & Light	Review of storm response	Focused Audit
Kansas City Power and Light	Construction Review and Prudency Testimony	Utility Consulting
Kentucky American Water Company	Comprehensive Operations Review	Management Audit
Kentucky Utilities Company	Merger Regulatory Support	Utility Consulting
Kentucky Utilities Company	Governmental Affairs Benchmarking	Utility Consulting
Kentucky Utilities Company	Comprehensive Operations Review – included fuel procurement review	Management Audit – includes fuel procurement
Long Island Power Auth	Emergency Storm Response Audit	Focused Audit
Louisville Gas & Electric Company	Merger Regulatory Support	Utility Consulting
Louisville Gas & Electric Company	Comprehensive Operations Review -- included fuel procurement review	Management Audit – includes fuel procurement
Montana Power	Power Plant Outage Process Improvement -- included fuel procurement review	Management Audit – includes fuel procurement



National Grid	Outage Response	Focused Audit
National Grid	Construction Program Audit	Focused Audit
New Hampshire Electric Cooperative	Emergency Response	Focused Audit
Niagara Mohawk Power Corporation	Development of fuel delivery, storage and utilization program	Direct work
Niagara Mohawk Power Corporation	Development of new coal procurement program based on modified specifications and suppliers.	Direct work
Niagara Mohawk Power Corporation	Development of fuel handling policies, procedures and training	Direct work
NorthWestern Energy	Construction Review and Prudency Testimony	Focused Audit
NRG Big Cajun 2 Coal Fired Power Plant	Operational Assessment	Focused Audit
NRG Huntley Coal Fired Power Plant	Plant Management	Utility Consulting
NRG Indian River Coal Fire Power Plant	Organizational Design Assessment and Analysis	Focused Audit
NRG Oswego Oil Fired Power Plant	Plant Management	Utility Consulting
NRG Texas Purchase	Purchase and Integration of Assets into the NRG System	Utility Consulting
PacifiCorp	Power Plant Maintenance, including fuel delivery and handling procedures development	Utility Consulting
PacBell	Attestation	Utility Consulting
Pacific Gas & Electric Company	DSM Analysis	Focused Audit
PECO Energy	Nuclear Prudence Review - included review of fuel procurement	Focused Audit
Pennsylvania Power & Light Company	Staffing Review	Focused Audit
PEPCO	Power plant fuel procurement and management	Focused Audit
Philadelphia Gas Works	Operations Review, Capital Project Analysis	Focused Audit
Philadelphia Suburban Water Company	Comprehensive Operations Review	Management Audit
Philadelphia Suburban Water Company	Reengineering of Operating Departments	Focused Audit
PowerSouth	Organizational Design Assessment and Analysis, including fuel procurement	Focused Audit
Plains Electric Generation & Transmission	Power Plant Construction	Utility Consulting
Public Service Co. - New Hampshire	Power Plant Outage Management	Utility Consulting
Public Service Co. - New Hampshire	Management audit of T&D operations	Utility Consulting



Public Service Co. - New Hampshire	Review of Emergency Response	Focused Audit
Public Service Electric & Gas Company	Nuclear Prudence Review	Focused Audit
Public Service Electric & Gas Company	Generation and Environmental Planning	Utility Consulting
Public Service Electric & Gas Company	Fossil Generation Rate Case	Utility Consulting
Public Service Electric & Gas Company	Clean Air Act Compliance	Utility Consulting
San Diego Gas & Electric Company	Performance Based Ratemaking	Utility Consulting
San Diego Gas & Electric Company	DSM Analysis	Focused Audit
Scranton Steam Heat	Plant Management	Focused Audit
Seattle City Light	Comprehensive Operations Review	Management Audit
SEMPRA	Affiliate Transactions	Focused Audit
Southern California Edison	DSM Analysis	Focused Audit
Southern California Gas Company	DSM Analysis	Focused Audit
Southern California Gas Company	Management audit of gas operations	Focused Audit
Southern California Gas Company	Affiliate Transactions Audit	Focused Audit
Southern Connecticut Gas	Management Audit	Management Audit
South Jersey Gas	Process Reengineering	Utility Consulting
Southern New England Telephone	Technical re. long-run cost modeling docket	Utility Consulting
Southwestern Bell Telephone	Call Center Work Management	Utility Consulting
St. Vincent	Management Audit	Management Audit – includes fuel procurement
Toledo Edison Company	Fuel Procurement Review	Focused Audit
Union Light Heat & Power	Operations Review	Management Audit – includes fuel procurement
United Telephone of Pennsylvania	Comprehensive Operations Review	Management Audit
United Telephone of Texas	Comprehensive Operations Review	Management Audit
Vectren Energy	Credit and Collections Audit	Utility Consulting
VI Water & Power Auth	Comprehensive Management Audit	Management Audit – includes fuel procurement
Washington Gas Light	Fuel Procurement Review	Focused Audit
West Ohio Gas Company	Gas Procurement Analysis	Focused Audit
West Texas Utilities	Comprehensive Operations Review	Management Audit – includes fuel procurement
Western Kentucky Gas	Comprehensive Operations Review	Management Audit



B. PROJECT TEAM

We provide a brief summary of our consultants in this section as well as our organization chart for the project so that the reader can better understand how and why we have allocated resources for the three tasks we have organized the project into.

Mr. Walter P. Drabinski, President of Vantage Energy Consulting, LLC - will serve as the **Engagement Manager for this assignment**. He has managed over one hundred and fifty comprehensive and focused utility assignments of varying magnitude and importance during his thirty-seven-year tenure as a management consultant. His education related to this project is significant and includes:



- BSEE from SUNY Buffalo with a concentration in power engineering, including transmission line and large equipment analysis;
- MBA in Finance and Entrepreneurial Management from the Wharton School.

His work experience also lends itself to this project and includes:

- Niagara Mohawk Power Corporation - five years at Oswego Steam Station. First as an Operations Project Engineer responsible for engineering and construction oversight activities of 1,700 MW of new generation. Two years as Electrical Maintenance Supervisor with responsibility for maintenance of generation at 2,000 MW plant, outage assistance at nuclear plants and 20 hydro stations, and maintenance of switchyards and transmission lines from plant to a major 345 KV substation; (Responsibility at Oswego Steam included electrical maintenance of all fuel handling facilities, including mills, burners, conveyors, train tip stations, and flow rate instruments.
- Niagara Mohawk Power Corporation – Five years as Director of Training with responsibility for 10 instructors at four fossil plants and two nuclear plants; This included technical training for mechanics, I&C technicians, electricians and plant and fuel operators.
- Management consulting – Thirty years with a number of firms, including 24 years as the President of Vantage.

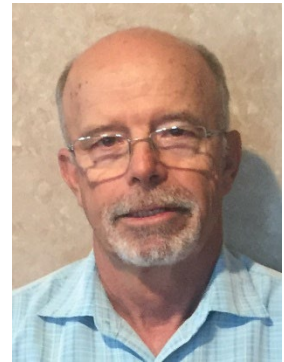
Finally, his direct experience on recent projects of this type includes:

- **Managed eleven EFC fuel audits of Ohio Utilities over last twenty-five years.**
- Recently completed fuel audits of **Dayton Power & Light in October 2020, Entergy Mississippi in April 2019 and Ohio Power in July 2019.**
- Conducted an affiliate compliance audit of Duke Energy-Ohio, which reviewed **complexity of fuel procurement in multi-state organization**, with centralized procurement organization;

- Project Director on **audit of gas procurement** activities and IRP implications of West Ohio Gas Company;
- Project Director on assessment of all **DSM and Alternate Energy project cost accounting** mechanisms for the California PUC. Review included hundreds of separate energy related projects in PG&E, SCE, SDG&E and SoCalGas territories; Testified before the CPUC.
- Project Director for assignment in which Vantage acted as an extension of staff for Kentucky PSC. Reviewed applications for Environmental Cost Recovery; assisted with discovery, hearings and development of draft orders. In total almost \$5 billion in investments were reviewed for LG&E, KU, Kentucky Power and Big Rivers;
- Project Director on operational audit of California ISO for FERC. Addressed market design, governance, and other operational issues. **Evaluated generation models, energy procurement plans, fuel policies and emergency activities.** Testified before House of Representatives subcommittee on major issues of the energy crisis;
- Entergy Mississippi – **Fuel Procurement Audit - 2010.** Comprehensive review conducted for five state regulators;
- Project Director on Audit of Southern California Edison Reliability Mechanism. Evaluated capital additions, staffing, related **fuel procurement projects**, and other aspects of \$2 billion per year investments;
- Project Director on **review of gas hedging practices** for all New Jersey gas utilities;
- Project Director on a review of numerous affiliate audits, including Duke Ohio, Duke Indiana, Duke Kentucky, Entergy, SDG&E, PG&E, PSE&G and Duquesne Light Company. **Fuel procurement organization was generally addressed;**
- Lead Consultant on comprehensive management audits addressing **power supply, fuel, operations, T&D, Customer Service, affiliate rules, finance and IT as part of comprehensive management audits of 15 utilities;**
- While with Niagara Mohawk Power Company, **construction manager on 115KV and 345KV transmission lines.** Later became Electrical **Maintenance Supervisor responsible for fossil, nuclear, and hydro facilities** in Oswego, NY area. Promoted to Director of Training – Fossil Generation with responsibility for all technical and management training of fossil generation personnel and technical training for nuclear plant personnel. Training department consisted of a dozen full and part time employees as well as many contracted programs.



Mr. Mike Boismenu - has extensive operating experience, including fuel procurement, efficiency improvement, and power system strategic planning. For this assignment, we will call upon his past experience with Niagara Mohawk as Plant Superintendent of a major coal fired power plant, Director of Value Engineering, Transmission and Distribution Engineering, Engineering Standards. He then held the position of manager for all east coast power plants owned by National Grid after acquisition from NiMo. In addition, Mike has worked as a management consultant with Vantage for thirteen years on a diverse number of technical assignments. His education related to this project includes:



- ECTI, Engineering & Electronics;
- Lemoyne College MBA program.

His work experience related to this project and includes the following:

- From 1969 until 1999, he was with Niagara Mohawk in positions such as: Project Engineer; T&D Design Engineer and Manager; Standards Engineering Manager, and Plant Manager Dunkirk Coal Plant;
- Mike was responsible for the overall fuel procurement process for the NRG Dunkirk Generating six unit coal facility;
- Led negotiations with the coal rail and ship providers to assure the efficient and timely delivery of coal to the NRG Dunkirk facility;
- With NRG from 1999 until 2005, in addition to plant manager, he was regional manager and system troubleshooting expert for the entire NRG system;
- Since 2003, he has worked with Vantage on a number of complex assignments involving power plant operations, fuel procurement and T&D;
- Directed the operation and maintenance of large NRG coal fired facilities in Dunkirk, New York and Indian River, Delaware resulting in a conversion from eastern coal to PRB coal and/or a major improvement in Station availability, reliability and performance;

Some consulting highlights include the following:

- Senior Engineer on the Consolidated Edison Audit of Consolidated Edison Company Emergency Preparedness and Storm Restoration for the NY PSC. Responsible for assessment of system planning, equipment standards, communications, field organization and root cause analysis;
- Assisted in review of construction management and cost control of KCP&L Iatan I & II Coal power plant in Missouri for the Kansas Corporation Commission;
- Responsible on consulting assignments that addressed Value Engineering, Engineering Standards, Reliability Engineering and Strategic Asset Management for T&D activities;

- Conceptualized and directed the development of an Automated Distribution Station Design System. For a large utility Resulted in a significant reduction in electric station engineering, design time and cost;
- Directed the automation of a utility’s Engineering Standards resulting in a significant improvement in the Line Department’s performance.

Mr. Mark Fowler, BS, MBA - Mark has **worked on over 100 audits and utility related projects** during his 35-years as a management consultant and utility employee. He has **worked with Vantage for 16 years**. His qualifications related to this project include:



- BSBA from the University of Tulsa with a concentration in operations research;
- MBA from the University of Tulsa with an operations research emphasis;
- A utility employee with several companies including Plains Electric G&T, Williams Pipeline and Buckeye Gas Products.

His direct experience on projects of this type includes the following.

- Project Manager and Lead Consultant on management audits addressing emergency response, power supply, fuel procurement, operations, T&D, Customer Service, and affiliate rules as part of comprehensive management audits of 40 utilities.
- Mr. Fowler completed a past management audit of Central Hudson Electric and Gas. His review included critical elements of the entire gas project management cycle, gas pipeline operations and maintenance and gas work and workforce management.
- Mr. Fowler, while with Vantage, also completed a review of the response of Long Island Power Authority (LIPA) to tropical storm Irene which included an in-depth review of Customer Call Center operations. LIPA operated a combined call center which took both gas and electric customer calls.
- Mr. Fowler worked with Vantage on a review of the Electric, Water and Fuels utilities of Curacao which also supplied neighboring Bonaire. The Curacao utilities were also facing major transitions with the then uncertain future of a major island refinery Isla owned by Petróleos de Venezuela, S.A. as well as tanker and barge terminal operations. Mr. Fowler’s portion of the review included fuel operations (aviation, bunker fuel, gasoline, diesel, lubricants and propane).
- He was a Senior Consultant on a three-year audit of the Call Center and Reliability results reported to the Indiana Commission by Indianapolis Power and Light (IPLCO) under specific penalty provisions. He worked with call center management to develop performance metrics that were then used for long term assessment.
- Served on an 18-month process review and improvement project for Belize Electric Limited (BEL). BEL was undergoing major changes in operations

including development of a hydroelectric project, renegotiation of transmission agreements with Commission Federal de Electricidad (CFE) and grappling with aging diesel generation. Mr. Fowler’s involvement touched on all these areas as well as customer service and payment centers which were scattered throughout the country.

Jean Gormley, BS, MS - Ms. Gormley is the Vantage CEO and primary owner. She has responsibility for all corporate administration, financial accounting oversight, proposal development, project administration, industry marketing, project staffing, consultant compensation and other corporate duties. On this assignment she will perform the role of analyst and project administrator. She will be responsible for coordinating data requests, interviews, meeting schedules, invoicing, report organization and editing, and overall quality control. She will also be responsible for invoicing on a timely manner and managing the budget with the Project Manager.



C. PROJECT SUMMARY

OVERALL SUMMARY OF VANTAGE PROPOSAL

Vantage brings a number of key attributes to this assignment, which we summarize below:

Company History and Reputation

Vantage was formed Walt Drabinski in 1992. Prior to then, he gained a broad range of experience in the utility industry. While with Niagara Mohawk:

- Operations Project Engineer for Niagara Mohawk Power Corporations for two years, with responsibility for startup testing of electrical and instrumentation and control systems for two 850 MW units.
- Electrical Maintenance Supervisor at Oswego Steam Station for three years.
 - Outage Manager for all generation in Oswego area, including: 2,000 MW Oswego Steam, 610 MW Nine Mile Point Nuclear Unit,
 - Provided electrical maintenance support for approximately 15 hydro stations in Oswego County.
- Director of Training for all Fossil (Technical and Operations) and Technical areas of nuclear two plants for five years. Managed a team of 12 instructors and contractors in developing and providing management, operations, and maintenance (electrical, mechanical, and Instrumentation & Control). Also coordinate extensive management training program for all personnel ranging from Forepersons to Vice Presidents.

After ten years, he took a leave of absence to attend the Wharton School of Management at the University of Pennsylvania where he received an MBA in Management.



After earning his MBA, he joined Theodore Barry & Associates, an international management consulting firm located in New York City.

After three years he joined Schumaker & Associates, becoming a Vice President and part owner. In 1992 he formed Vantage Consulting Inc, which upon relocation to Florida in 1998 became Vantage Energy Consulting LLC.

During his career he has worked on over 150 utility consulting assignments, the vast majority while with Vantage.

He will act as Project Manager and as well as having responsibility for the majority of the technical work, report writing, and testimony.

Proposed Consultants

Lead Consultants Mark Fowler and Mike Boismenu will support Project Manager, Walt Drabinski. We should note that Mike and Walt have worked at, audited, or analyzed over 250 power plants world-wide. Our team is familiar with unit design alternatives, heat rate and efficiency improvement opportunities, plant organizations, control systems, environmental upgrades, fuel system options and best practices.

Project Approach

We have arranged our work plan in a methodical manner that assures all required work is completed, reviewed, and included in the report. We have organized the work activities to mirror the requirements of the RFP. The result is a work plan with 65 discrete activities. Each step has a proposed budget, which rolls up to the proposed, not to exceed, budget for the project of \$73,000.00.

Project Schedule

We have proposed a schedule that begins in mid-May and is completed by September 30, 2021. We note that our internal schedule will drive toward an earlier completion date. Vantage takes great pride in consistently meeting our committed to project schedules.

Workplan

Our workplan consists of numerous work steps that build upon one another in order to achieve the desired results. We note that many of the work steps will be done simultaneously through interviews and data analysis.

Budget

Vantage proposes a budget that is developed from the bottom up. Essentially, we consider each work step, estimate the hours it will need for completions, adjust for overlapping or parallel work and derive estimated hours from this process. This process has been used in all of our proposals for many years and gives us confidence. We commit to complete all



required work with the proposed budget regardless of any overruns. Should we need fewer hours, we will invoice accordingly.

Report Preparation

We prepare our reports in linear manner. We start with individual tasks, each of which has a written work product developed for it. While a task is assigned to a single consultant, we work as a team and communicate information learned through interviews or review of data that may be of use in other areas of the report. Once work sections are prepared, they are assembled into a working draft. At this point, we develop both overall and targeted findings, which then lead into proposed recommendations.

Staff Involvement

We welcome Staff involvement and truly believe it leads to both a better work product and clearer communication with the Commission. Staff will be invited to take part in all interviews, and are encouraged to ask questions. We have learned that the questions the Staff ask often provide a more defined direction for our own work. Obviously, as stated elsewhere, the Staff will conduct a review and edit of the draft report prior to our completing the final report. A review by the Company is always welcomed, if permitted by procedures for this assignment.

Report Construction

Our proposed construct of this report is typical to most audits that we conduct. It will consist of an executive summary, chapters for all discrete technical areas, and an appendix if needed for useful data. Footnotes will be used extensively to link our analysis to either data responses or interviews. We note that we make every effort to use written factual information rather than statements made in interviews whenever possible. Our view is that interviews provide a source for identifying written reports, correspondence, policies, etc. We have numbered Findings and Recommendations. The Findings summarize our analysis and support recommendations. The recommendation statement starts with an action verb, followed by a succinct statement. This is followed by details as to the rationale for the recommendation, specific implementation steps, potential savings or improvements, a schedule and implementation costs where possible.

Testimony and Witness Preparation

We have proposed Walter Drabinski as our lead witness. If other witnesses are needed, they will be made available. All consultants are experienced testifying. As Project Director, he will be involved in all analysis and report writing, making him most qualified to testify. Further, after testifying over 100 times he is comfortable and agile on the witness stand.

D. SCHEDULE

We understand that the work plan may change as issues arise or diminish. Vantage is very flexible and will adjust our work efforts based on meetings with the Staff, or issues we



identify and bring to their attention. Vantage is committed to meeting all defined or future work requirements within the budget proposed in this proposal.

PROJECT SCHEDULE

Task Name	Duration	Start	Finish
Project Start – Conference Call to establish procedures, etc.		5/17/22	
Identify Key documents based on call and set project management procedures. Send to Staff and Company.	2 days	5/17/22	5/19/22
Request key documents (Assume 5 day working days for document response)	5 days	5/20/22	5/26/22
Receive and review documents	10 days	5/27/22	6/14/22
Identify, select and schedule interviews	3 days	6/2/22	6/4/22
Monthly Project Conference Call	2 hours	6/15/22	
Conduct in person or virtual interviews *	10 days	6/14/22	6/18/22
Prepare task analysis based on data and interviews	20 days	6/21/22	7/19/22
Monthly Project Conference Call	2 hours	7/15/22	
Preliminary conclusions and recommendation	20 days	7/21/22	8/13/22
Preliminary Draft of all work products	20 days	8/14/22	9/14/22
Monthly Project Conference Call	2 hours	8/18/22	
Internal edit of draft report	5 days	9/14/22	9/21/22
Submit and respond to Staff edits	5 days	9/21/22	9/27/22
Complete and Submit Final Report	3 days	9/27/22	9/30/22

* Vantage consultants are prepared to travel and/or conduct this project virtually, depending on the Commission’s Covid protocols and preferences. We have successfully conducted multiple virtual audits using methods developed internally.

E. WORK PLAN

PROJECT ACTIVITIES , HOURS AND FEES PER ACTIVITY

As required per the RFP, Vantage shall assist Commission Staff in:

- reporting Staffs findings in writing to the Commission, Vantage will work as an extension to staff in this endeavor.
- identifying any irregularities detected in the monthly fuel adjustment calculations that were incorrectly assessed and applied to Louisiana consumer billing statements. Detailed and in-depth analysis will provide a firm basis for all findings of fact.
- Vantage will identify and quantify any errors resulted in unauthorized collection by the utility.
- Any errors in procedures or policy that allowed for the recovery of unauthorized expenses by the utility will be thoroughly investigated.
- Root causes will be identified for any systemic errors



- Modification to policies and procedures will be proposed related to the above issues.
- The report will be structured to clearly relate our findings, conclusions and recommendations and will be suitable as evidence if testimony is required.
- A written executive summary that clearly quantifies any cost modifications required as a result of the audit will be included.
- Any instances from the audit in which a violation of the FAC Order will be recorded.
- Recommendation as to the appropriate methodology to be utilized by the Commission to provide for recovery of those funds. Will be clearly delineated

The following provides a listing of the Work Activities for this assignment, the estimated hours for completing each activity, and the cost by activity and total cost.

TASK 1 – REVIEW AND ANALYSIS OF FUEL ADJUSTMENT REPORTING

This task will address all analysis related to the monthly comprehensive fuel adjustment reporting requirements filed with the Commission. Elements of the task include:

- Request all information, reports, schedules, polices, procedures, key correspondence, etc. related to review and analysis of fuel procurement.
- Request organization charts of all procurement related departments involved in fuel procurement, utilization, ash disposal, and plant operations.
- Interview all supervisory personnel related to fuel procurement, utilization, and ash disposal.
- Interview power plant personnel related to fuel handling, measurement, consumption reporting and inventory analysis.
- Review all plant policies related to coal procurement and quality requirements and reporting.
- Review and coal pile inventory studies and calculations for last five years to determine accuracy and variability.
- Assess issues related to delivery problems, if any.
- Analyze inventory studies for issues related to accuracy.
- Review coal specifications for each unit/plant, including options for meeting emissions standards.
- Review samples of monthly coal quality analysis.
- Review all emissions standards for each unit and relative impact of coal quality requirements.
- Review cumulative emission measurements versus unit. Plant and system requirements.



TASK 2 – DEVELOPMENT AND IMPROVEMENT OF INTERNAL STAFF PROCEDURES

This task will address the development and improvement of internal staff procedures to effectively monitor and evaluate utility performance in all areas impacting the fuel and purchase power costs which are then reflected in the utility's monthly fuel adjustment filings with the Commission. Vantage will:

- Request and review all written policies and procedures related to monitoring and evaluation of utility performance. Specifically, request and review data related to:
 - Development of fuel quality specifications as they are related to optimum unit performance, including heat rate, boiler performance, ash quality, slag flow and quality, etc.
 - Inventory targets based on seasonal requirements, projected utilization, fuel switching policies, and other external drivers of inventory.
 - Ash disposal optimization programs.
- Request and review details related to purchase power policies, quantities, and amounts. Specifically, determine savings associated with purchase power by month.
- Review any analysis or studies related to the impact of fuel quality on boiler operation. Specifically, what impact does BTU level, ash content, slag flow quality, sulfur and other elements in the coal have on heat rate, forced outage rate and other operating parameters.
- Assess whether the overall procurement policy is based on a holistic approach that includes both quantifiable and intrinsic values.
- Determine if fuel procurement staff request input and feedback for plant operations, fuel handling and maintenance as to the issues of various quality coal.

TASK 3 – REVIEW AND ANALYSIS OF THE UTILITY'S MONTHLY COMPREHENSIVE FUEL ADJUSTMENT FILINGS

In this task we will review and analyze of the monthly comprehensive fuel adjustment filings to assure compliance with all pertinent state and federal regulations.

- Query all relevant Company departments to determine any state or federal regulations that may apply to fuel procurement, transportation, storage, and consumption.
- Make similar queries to any state or federal regulatory body that may have specific information.
- Review any analysis prepared internally that addresses verifies compliance with pertinent state and federal regulations.
- Identify any instances where errors continued over a period of time.
- Determine whether the FAC filings comply with any applicable state and federal regulations.
- Provide a gap analysis that identifies failures in reporting compliance.
- Prepare recommendations as to improvements in reporting.



F. PROJECT MANAGEMENT

Vantage uses several proven project management techniques that will enable us to manage this project while enhancing communications among the project team members, the Department and Company management while ensuring confidentiality of key data.

COMMUNICATIONS AND PROJECT MANAGEMENT

Project Director – Walter P. Drabinski will serve as the Project Director on this project and will have day-to-day responsibility for on-site activities, scheduling of interviews, field trips, submittal, review and distribution of data responses and any day to day problems that arise. He will provide direct coordination of report drafts and assure that all work steps are fully addressed. In addition to having extensive responsibility for audit activities and authorship of the report, he will be responsible for overall quality control, schedule compliance and budget adherence. He will be the primary contact for contractual communications with APS. He will also be responsible for facilitating resolution of any issues as they arise.

We will use several effective techniques that will enable us to manage this project while enhancing communications among the project team members and Staff.

QUALITY REVIEW

A quality work product is a team effort. The process begins with the consultants - the individuals performing the day-to-day work. They must clearly understand the requirements of their assignments, have a well-considered plan of attack, and execute their assignments effectively. While it is the Project Director's responsibility to impart initial direction and focus, direct responsibility resides with the consultant for meeting detailed objectives and deadlines.

The Project Director and team members will meet reporting standards to ensure that the written report communicates the results of the audit in a complete, accurate, objective, convincing, clear, concise, and timely manner. Reports will include:

- a statement of the audit objectives and description of the scope and methodology
- a statement of professional standards adhered to in the analysis and the report
- a listing of significant issues and questions, if any, needing further study and consideration
- a listing of findings that are prioritized, relevant and practical
- a statement as to whether any pertinent information was omitted because it was deemed privileged or confidential and a description of the nature of such information and the basis under which it was withheld

These fieldwork and reporting standards are the foundation of our Quality Assurance Program. The quality review process involves the application of these standards at several points along the critical path.



CONFIDENTIALITY

Vantage recognizes that all information collected from the work processed under this contract must be treated with care to preserve any issues of confidentiality. Vantage and all employees involved on this assignment will sign the Non-disclosure and Use of Information Agreement upon award of the project. Further, Vantage will utilize its internal controls to ensure all materials are handled in a manner that prevents inappropriate dissemination. Internal controls consist of:

- Vantage’s PC-based network database system is secured through a series of passwords for each project. Only selected project consultants have the ability to access the information in the database system
- All data stored at the Vantage office is kept in locked file drawers
- All information used by consultants is collected at the end of the project and stored with other working papers, notes and drafts in a secure room
- Vantage also can use encryption software to ensure that the transmittal of files across the internet is secure. This method allows an individual to send or receive files that are encrypted. Only individuals with the same software and codes can then decode the files.

INFORMATION REQUEST MANAGEMENT SYSTEM

Throughout the course of the review, the team will submit a number of information requests. Efficiently managing outstanding information requests and those documents received are crucial to the success of the project. We use a cloud-based system designed to increase the efficiency of handling of all information requests.

After the initial submittal, information requests will be batch submitted and e-mailed to the Staff and Company Project Manager. Questions regarding definition of the requests by the Company will be facilitated by telephone discussions. In order to facilitate the timely completion of this fixed-price project, we anticipate receiving a response to most information requests within 10 working days.

AUDIT SAMPLING

Vantage utilizes Section 350 of the Generally Accepted Auditing Standards. We refer to Wiley, 2010 Practitioner’s Guide, pages 311-333, for details on both statistical and non-statistical sampling methods as applied to a performance audit of the type required for this assignment.

AUDITING STANDARDS

Vantage utilizes all auditing standards that are appropriate on each assignment we undertake. In general, we adhere to:

- Since this assignment is a Performance Audit, we will utilize the Generally Accepted Government Auditing Standards (GAGAS) (also known as the Yellow



- Book). This refers to the “Standards for Audit of Governmental Organizations, Programs, Activities, and Functions by the Comptroller General of the United States.
- Vantage also utilizes the American Institute of Certified Public Accountants’ (AICPA) Code of Professional Conduct when needed.
 - The National Association of Regulatory Commissioners’ Consultant Standards and Ethics for the Performance of Management Analysis are also utilized.

DEVELOPMENT OF RECOMMENDATIONS

The development of concise, useful and cost effective recommendations is the ultimate objective of a management audit. Vantage approaches the development of recommendations from two directions. First, many recommendations become obvious as field work is progressing. Our consultants become aware of problems and can develop recommendations as the project progresses. These are then part of initial task reports and the first draft of a final report. More global, comprehensive recommendations are developed after the draft report is assembled and the Project Director and Lead Consultants assimilate the entirety of the analysis. These can encompass earlier proposed recommendations or be prepared as more global in nature.

DEVELOPMENT OF COST/BENEFIT ANALYSIS

Good recommendations must be sensible. The cost/benefit must be well developed and favorable. Recommendations should be reasonably achievable. They must define the responsible party and schedule for implementation. The Vantage final report will provide, not only good, sensible recommendations, but an indication of cost and benefit, where possible, and details on responsibility and schedule.

REPORT DOCUMENTATION

We have extensive procedures and PC-based software systems that permit us to:

- footnote, annotate, and cross-reference the task, draft, and final testimony to our working papers and the detailed work plan, resulting in a complete documentation trail
- schedule and track interviews through a PC-based database system
- track the request and receipt of information requests through a PC-based database. Numerous summary and detailed reports permit project management and allow the client to assess company response rates

Footnotes serve as the basis for annotating our reports, which we use to identify the source of information that supports a statement of fact, finding, conclusion, or recommendation. As policy, we require that every fact, quote, result of analysis, or other statement that can be challenged be footnoted.



PROJECT DELIVERABLES

Deliverables for this project include both verbal and written updates as well as specific written report drafts, ultimately concluding with a final report. Specific expectations of deliverables will include:

- **Fiscal Reports** – Vantage will submit an invoice monthly along with a project status report.
- **Interim Reporting** - Vantage has scheduled oral progress reports to Staff each month after the written report is provided.
- **Detailed Work Plan** – A detailed work plan will be developed after preliminary interviews are conducted and the first set of data requests are provided and reviewed. This work plan will provide specific details on all work steps, evaluative criteria, a revised budget (keeping within the not-to-exceed amount) and analysis.
- **Draft Report** – An initial draft report will be provided as set forth in the schedule. It will be representative of the final report. Upon review and approval of the draft report by the Staff, it will be sent to APS for review of factual accuracy.
- **Final Report** - The final report to the ACC will document Vantage’s evaluation of each aspect of the audit scope, as outlined in this RFP and the subsequent approved detailed work plan. All of our work papers will be made available. The Final Report will be provided in hard copy as well as electronic format.
- **Testimony** will be provided as required by the Project Director, Walter P. Drabinski.
- **Working Papers** - A complete set of working papers shall be delivered to the Director. They will be indexed and in orderly form, follow the development of the conclusions in the audit report. Voluminous documents will be included only as references in the working papers, upon Staff’s agreement. Confidential documents will be clearly marked and provided in a separate section of the working papers.

G. PRIOR EXPERIENCE

This section describes Vantage’s experience and qualifications for this proposal. Vantage Energy Consulting LLC, (Vantage) is a management consulting firm headquartered in Cudjoe Key, Florida, with clients throughout North America. Vantage consultants possess a broad background in all business aspects of electric, gas, and water utilities, but retain particular expertise in utility operating functions. Vantage Energy Consulting LLC and its predecessor company, Vantage Consulting Inc., have been in existence for over 24 years. During that time, the firm has focused on conducting utility related management consulting assignments. As the details on specific assignments described below attest, Vantage has been one of the most successful companies in this venue.

The Vantage team consists of highly experienced, trained consultants, covering virtually all functional work areas within the utility industry. Vantage is staffed by a total of 20 full-time



and contract consultants and administrative staff. Consultants have a diverse set of backgrounds, including engineering, accounting, economics, finance, and psychology.

Vantage provides a broad range of consulting services to investor-owned utilities, independent power producers, regulatory agencies, state planning and environmental agencies, and law firms. While the majority of our assignments are tailored to the specific needs of the client, there are specific products and services which we offer. The functional service areas in which we work, and the consulting topics to which we provide expertise, are listed below.

VANTAGE SPECIFIC EXPERIENCE AND QUALIFICATIONS

Based on our current experience in the energy industry, we understand our role perfectly. While it is largely defined by the steps provided in the RFP, it also requires that we maintain a sense of perspective, and communicate any potential issues before they arise to the level of a problem. The specific work requirements include knowledge and experience related to:

- **Previous Fuel and Purchased Power Audits** – Walt Drabinski has managed many fuel and/or purchased power audits, including:
 - o Allegheny Power Systems
 - o Columbia Gas of Maryland
 - o Curoil (Virgin Islands)
 - o El Paso Natural Gas Company
 - o Southern California Gas Company
 - o Washington Gas Light
 - o Entergy Mississippi
 - o Virgin Islands Water & Power
 - o Dayton Power & Light
 - o Monongahela Power Company
 - o West Ohio Gas Company
 - o Cleveland Electric Illuminating Company
 - o Toledo Edison Company
 - o Ohio Power Company
 - o Columbus Southern Company
 - o National Gas and Oil Company of Ohio
 - o Louisville Gas & Electric
 - o Kentucky Utilities
 - o East Kentucky Electric Cooperative
 - o Aqualectra (Curacao)
 - o St Vincent Electric and Grenadines
 - o St. Lucia
 - o US Virgin Islands



- **Energy Markets** – Vantage has acted as technical consultant for Kentucky, Pennsylvania, Delaware, California, Ohio, Maryland and Virginia which required in-depth understanding of energy markets, pricing, supply constraints and other related dynamics. These projects occurred during the 2006-2022 time frame, with the Kentucky assignment recently concluding.
- **CAA Compliance Issues** – Vantage has been assisting the Kentucky PSC for five years as it evaluated requests by its regulated utilities to recover environmental costs associated with current EPA regulations on power plants. These requests included major decisions regarding fuel type and source, purchased power options, new technology replacement options and retirement decisions. To date, we have assessed almost \$5 billion in construction costs for AEP’s Kentucky Power Company, Kentucky Utilities, Louisville Gas & Electric and Big Rivers Company. Vantage monitored the installation of almost \$2 billion in environmental projects in Kentucky.
- **Energy Procurement** – Vantage has acted as an independent monitor and/or bid facilitator on over fifty energy auctions in Maryland, Delaware, Virginia, and Pennsylvania. (2002-2014)
- **Power Plant Operations** – Vantage has extensive experience in power plant operations. Walter Drabinski, Project Director has worked in over 150 plants worldwide while Mike Boismenu managed a large coal plant and worked as a troubleshooter throughout the US. Between them they have worked at over 250 power plants assignments as part of comprehensive management audits, direct work on the application of environmental technologies, heat rate and EFOR improvement and staffing evaluations.
- **Power Interruptions and Outage Studies** - Vantage consultants have extensive experience in working with utilities and regulators on the subjects of both planned and unplanned interruptions of generation, transmission and distribution. Some of our major projects included:
 - Vantage conducted an audit of SCE’s system hardening efforts, evaluative over 10,000 work orders totaling over \$2 billion.;
 - Review of LIPA after extensive outage due to hurricane Irene,
 - Review of Con Edison after a series of major power outages;
 - Review of Commonwealth Edison after a series of major per outages.
- **ISO Operations and Rules** – Vantage consultants have been working directly with CAISO, MISO and PJM personnel on numerous assignments. We have performed analysis of FTR and other related costs as part of our role in monitoring SOS auctions. Vantage has had access to and the ability to evaluate pricing data associated with energy and capacity prices and transactions.



- **Alternate Energy Resource Analysis** – Vantage performed a comprehensive review of Demand Side Management and renewable programs for the California PUC’s four major IOUs. This included PG&E, SCE, SDG&E and SoCalGas.
- **Risk Management** – Vantage has performed a number of major utility risk management assignments, including an assessment of hedging for all of the New Jersey LDCs.
- **Industry Perspective** – Vantage is a student of the electric industry and keeps abreast of changes and any dynamics that impact and change utility tactical and strategic planning.

H. REFERENCES

KANSAS CORPORATION COMMISSION

Reference Contact

Jeff McClanahan, Executive Director
Kansas Corporation Commission
785-271-3212
j.mcclanahan@kcc.ks.gov

System Analysis and Prudency Witness re. Westar/KCP&L Merger

Vantage performed an assessment of the Westar and KCP&L generation plans, system reliability, customer service and merger savings related to the proposed merger of Westar and KCP&L. Walt Drabinski testified in February 2017 on the above topics.

Prudency Review Kansas City Power & Light Iatan 1&2 (2008-2012)

At the request of the Kansas Corporation Commission (KCC) Staff, provided oversight of the \$500 million installation of an Air Quality Control System (AQCS) on the existing (KCP&L) Iatan Unit 1 and monitored construction of the \$2 billion Iatan Unit 2 coal fired, supercritical power plant. Reviewed organization, cost, schedule, project controls, contractor performance, contract monitoring, site conditions, and other key attributes associated with a mega-project. Provided regular assessments to the KCC on progress and risks, monitored startup and acceptance testing, and provided testimony in rate cases for both Iatan 1 and 2, with recommendations for almost \$240 million in prudence disallowances.



KENTUCKY PSC

Reference Contact

Contact Person: John Rogness, Audit Manager
Tel./E-mail Address: (502) 564-7248 : johnrogness@ky.gov
Address: 211 Sower Boulevard; P. O. Box 615; Frankfort, KY 40602

Vantage has performed a number of recent assignments in Kentucky:

- Vantage completed a comprehensive audit of Grayson Electric a Kentucky based electric utility.
- We also reviewed testimony and assisted in rate cases related Environmental Cost Recovery (ECR) mechanism for the Kentucky PSC. On this assignment, Vantage consultants acted as an extension of staff in four separate cases. The ECR permits recovery of environmental costs through a separate surcharge after a formal proceeding. Vantage reviewed applications, submitted and reviewed interrogatories, prepared summaries for and briefed the Commissioners and Staff, assisted in hearings and helped draft the final orders. In total almost \$5 billion in ECR projects were awarded. In addition to this assignment,
- Vantage has also, over the last twenty years, performed comprehensive or focused management audits of Kentucky Utilities, Louisville Gas & Electric, Western Kentucky Gas, Kentucky Suburban Water Company, East Kentucky Cooperative; and Bell South.

LAKE WORTH ENERGY

Reference Contact

Contact Person: Ed Liberty, COO
Address: 414 Lake Ave., Lake Worth, FL 33460
Tel./E-mail Address: 561-586-1670; eliberty@lakeworth.org

Vantage has performed a broad range of assignments that included focused audits of various functional areas. This included generation and transmission planning, meter reading for commercial customers, fuel procurement and contract analysis. Vantage also assisted in preparing and negotiating supply contracts. This is an ongoing assignment, with Vantage monitoring monthly procurement nominations and regional pricing.

I. PROJECT PERSONNEL BUDGET

TEAM MEMBERS

Vantage provided an organization chart and summary bios of each consultant in Part I of this proposal. Detailed Resumes are included in Appendix A – Resumes. Our team members work out of local offices. Walt Drabinski is located on Cudjoe Key, Florida; Mike Boismenu is located in Dunkirk, New York and Chuck Buechel is located in Fort Thomas,



Kentucky. Based on the length of the project and the hours budgeted for each consultant, no one will devote more than 25% of their time to this assignment. We commit each consultant to be available when needed for this project.

PROJECT HOUR BREAKDOWN AND COST BY ACTIVITY

Vantage has prepared a proposed budget for this assignment based upon the identifiable tasks in the RFP. We recognize that the exact time requirements for each task will vary from our proposal, but we have confidence, based on our years of experience that we are projecting a reasonable budget. Of course, Vantage takes the risk of underbudgeting. We are proposing a not to exceed budget, with a blended hourly rates of \$225/hour for all consultants. Should we require fewer hours than budgeted, we will bill at a total level below the contract limit. Our proposed contract budget is **\$73,000**.

A PLANT IN SERVICE AND CAPITAL EXPENDITURE PROGRAM AUDIT OF COLUMBIA GAS					
Hour and Fee Estimate					
	Project Director	Senior Consultant	Project Administrator	Total Hours	Total Fees
	\$290	\$250	\$100		
Task 1 - Review and Analysis of Fuel Adjustment Reporting	32	32	16	80	\$18,880
Task 2 - Development and Improvement of Internal Staff Procedures	40	40	16	96	\$23,200
Task 3 - Review and Analysis of the Utility's Monthly Comprehensive Fuel Adjustment Filings	24	32	16	72	\$16,560
Testimony, preparation, interrogatory responses	24	16	8	48	\$11,760
Project Total Hours	120	120	56	296	
Project Total Fees	\$34,800	\$30,000	\$5,600		\$70,400
Consultant Trips	1	1	0	2	
Estimated Travel Expenses					
Hours per trip	24				
Hotel cost per trip	\$400				
Airfare per trip	\$650				
Ground Trans. per trip	\$100				
Per diem per trip	\$150				
Cost per trip	\$1,300				
Number of consultant trips	2	Assume minimum travel. One trip for testimony			
Travel Expenses	\$2,600				
Total Project Cost	\$73,000				

PROPOSAL PREPARATION

Mr. Walter P. Drabinski, President of Vantage prepared this proposal and can respond to any questions.

TESTIMONY

Mr. Walter P. Drabinski, President of Vantage will testify. He has testified over 150 times, including approximately 20 times in FAC cases.



J. CONFLICT OF INTEREST

Neither Vantage Energy Consulting LLC, or any of its consultants have any conflict of interest related to this assignment.

- Vantage has had no previous assignment with SWEPCO or any company or subsidiary related to it.
- None of our consultants have conflicts of interest due to past work for SWEPCO or any company or subsidiary related to it.
- None of our team has worked with the Consumer Advocate or other advocacy groups, or any other party that comes before the Commission.

K. AUTHORIZED NEGOTIATORS

The authorized negotiator for this assignment is:

Walter P. Drabinski, President
Jean A. Gormley, CEO
Vantage Energy Consulting LLC
20844 4th Ave. West
Cudjoe Key, FL 33042
Tel.: 305-744-3440; Fax: 305-744-3450; Cell: 305-394-0784
E-mail: wdrabinski@vantageenergyconsulting.com
E-mail: jgormley@vantageenergyconsulting.com

Web Site: <https://vantageenergyconsulting.com>



APPENDIX A. RESUMES

- Walter P. Drabinski
- Mike Boismenu
- Mark D. Fowler
- Jean Gormley



RESUME OF MR. WALTER P. DRABINSKI

AREAS OF SPECIALIZATION

Mr. Drabinski is President of *Vantage Energy Consulting LLC*. He has more than 40 years of experience in the utility industry as both a utility company manager and a management consultant. His functional expertise includes all aspects of power plant construction and operations, utility strategy, organization, executive and financial management, productivity improvement, operations and maintenance, engineering, and environmental compliance. As a utility manager, Mr. Drabinski held the positions of Operations Project Engineer on the construction of a 2,000 MW project, System Training Director, Fossil Generation; and Supervisor, Electrical Maintenance for Niagara Mohawk Power Corporation in upstate New York. As a management consulting principal, he has worked for national firms and has been President of his own firm for 20 years. During that time he has managed more than 150 consulting engagements; he has performed work related to almost 140 generation units that were under construction or operating and he has testified in formal regulatory hearings over 50 times.

SELECTED CONSULTING EXPERIENCE

POWER PLANT OPERATIONS AND FUEL PROCUREMENT

Louisville Gas & Electric – Project Manager for a comprehensive management and operations review for the Kentucky Public Service Commission. A key element of this audit was the analysis of the Energy Services Company of LG&E Energy, a holding company which was the organizational entity responsible for all regulated generation and non-regulated generation, power marketing, and natural gas transmission activities. This included a special review of affiliated transactions. Acted as Lead Consultant in the areas of power production, fuel procurement, Affiliated Review, Clean Air Act compliance, Energy Policy Act response, and T&D engineering and construction. Assisted in review of strategic planning and power marketing activities. In conjunction with this audit, Mr. Drabinski met with the Commissioners a number of times to discuss issues of industry restructuring and the role the Commission should play.

Kentucky Utilities Company – Project Manager for a comprehensive management and operations review for the Kentucky Public Service Commission. Acted as Lead Consultant in the areas of power production, fuel procurement, transmission operations, and engineering and construction. Provided numerous recommendations to improve competitiveness of this already low-cost utility. Met with the leadership of the State House of Representatives and Senate to discuss utility competition and industry restructuring.

East Kentucky Power Cooperative – Performed a comprehensive review of all fuel procurement and fuel utilization activities for the Board of Directors. Visited all power plants, coal tipples, and a sampling of mines. Recommendations addressed a broad range of strategic and operational issues.



Resume of Walter P. Drabinski

Dayton Power & Light – Performed a comprehensive review of all fuel procurement and fuel utilization activities for the PUCO. Visited power plants, coal lab, and other fuel and operations related departments. Recommendations addressed a broad range of strategic and operational issues.

Pennsylvania Power & Light – Lead Consultant for a comprehensive management and operations review for the Pennsylvania Public Utility Commission. Reviewed all aspects of customer service activities, including CIS and office operations. Also, reviewed system power & engineering, including fuel supply, T&D engineering, environmental, power plant staffing, and plant operations. Reviewed EMF issues and Clean Air Act Amendments compliance planning.

Centerior Companies (Cleveland Electric Illuminating Company and Toledo Edison) – Project Manager on audit of electric fuel procurement practices and procedures for the Public Utilities Commission of Ohio in 1991. Responsibilities included the review of fuel procurement planning, long-term contracts, and spot procurement. Made recommendations regarding coal contracts, interstate wheeling arrangements, and coal transportation costs. Testified twice regarding results of audit report.

Monongahela Power (Allegheny Power Systems) – Performed a comprehensive review of all fuel procurement and fuel utilization activities for the PUCO. Visited power plants, coal lab, and other fuel and operations related departments. Recommendations addressed a broad range of strategic and operational issues.

American Electric Power Company – Project Manager on audit of electric fuel procurement practices and procedures of two AEP subsidiary companies, Ohio Power Company and Columbus Southern Power Company in 1989 and 1990 for the Public Utilities Commission of Ohio. Responsibilities included the review of affiliated mines (surface and deep mines) and fuel procurement planning, long-term contracts, and spot procurement. Made recommendations on strategic planning, purchasing policies, contract analysis, and marketing programs. Testified on four occasions regarding results of audits.

West Texas Utilities – Project Manager for a comprehensive management and operations review for the Texas Public Service Commission. Acted as a Lead Consultant in the areas of power production, fuel procurement, and customer services.

El Paso Natural Gas Company – Lead Consultant on a productivity improvement project. Performed an in-depth review of all positions in operating divisions and reorganized operating divisions into profit centers. Developed procedures for in-house vs. outside construction decisions, construction scheduling, and cost data collection. Developed a manpower planning model for restructuring responsibilities and staffing levels. Implemented a workforce management program at gas processing plants, compressor stations, and throughout the gathering system.



Resume of Walter P. Drabinski

Western Kentucky Gas Company – Lead Consultant for a management and operations audit of the customer services function for the Kentucky Public Service Commission. Developed plan for consolidating offices, resulting in significant changes in providing customer service.

National Gas and Oil Company of Ohio – Lead Consultant on audit of fuel procurement practices for the Ohio PUC in 1986. Reviewed purchasing practices, storage activities, sales practices and policies and procedures. Made recommendations on strategic planning, purchasing policies, and marketing programs.

East Kentucky Power Cooperative, Inc. – Performed as a subcontractor on a review of the bidding process for a series of combustion turbines. Analysis included reviews of individual proposals and the bidding process.

Ohio Electric Co./Ohio PUC – Lead Consultant on a prudence review of the Beaver Valley Power Station. Areas reviewed included CAPCO organization and financing, construction management, project accounting, compatibility of prudence standards, and compliance with Yellow Book standards.

ENERGY PROCUREMENT ASSIGNMENTS

Maryland Public Service Commission – Monitored all RFP solicitations for 2007 and 2008 bid years. This amounted to nine solicitations for all four utilities in Maryland. Provided oversight on bid day, reviewed applications, provided confidential analysis and briefings to the Commissioners and testified on results.

Alleghany Power Virginia – Monitored RFP solicitations for 2007 and 2008 bid years. Provided oversight on bid day, reviewed applications, provided a final report on results for the Virginia regulatory agencies.

Delaware Public Service Commission – Monitored all RFP solicitations for 2006 and 2010-11 bid year. Provided oversight on bid day, reviewed applications, provided confidential analysis and briefings to the Commissioners and testified on results.

Maryland Public Service Commission – Provided analysis and related testimony on restructuring-related cases in 2007 and 2008. Testimony involved wholesale market issues, portfolio options and rebuttal relative to utility witnesses.

Duquesne Light Company – Project Manager on assignment in which Vantage conducted solicitation of energy for POLR customers. Vantage utilized its own proprietary software and secure web site to conduct bidding. Vantage also constructed webinar to educate potential bidders and acted as conduit for all information requests and dissemination of confidential load data.



Resume of Walter P. Drabinski

OPERATIONAL AND MANAGEMENT

Consolidated Edison Company – Performed an audit of emergency restoration and outage planning capabilities for the New York PSC. Audit followed a number of large and highly public outages. Major recommendations were made to develop new strategies and programs for addressing reliability and outage response.

Commonwealth Edison Company – Retained by the Illinois Commerce Commission to investigate outages suffered in downtown Chicago during the summer of 1999. The assessment provided a comprehensive analysis of eight separate outages, with details of causes and recommendations for improvement.

FERC – Interfaced with Commission and its staff on issues such as Transco structures, restructuring, and ISOs. Prepared a white-paper that addressed a Transmission PBR as a mechanism for incenting utilities.

Maryland Public Service Commission – Provided technical support in hearings and development of a final order relative to developing a formal procedure for addressing Standard Offer Service (SOS) supplies for its four electric utilities.

Seattle City Light – Conducted a controversial audit of Seattle City Light’s financial, risk management and governance structure. Serious issues regarding debt, O&M and Capital expenditures were raised. Major recommendations on risk management were developed.

New Hampshire Public Service Commission – Provide technical and strategic assistance under a long-term contract on transmissions and distribution issues. These have included ISO strategies, local distribution reliability, asset decisions and general regional concerns.

Louisville Gas and Electric/Kentucky Utilities Merger – Assisted with broad range of issues including regulatory strategy, synergy quantification, testimony development, witness preparation, interrogatory development and responses. System reliability and monitoring was a key element of this complex project.

Public Service Electric & Gas Company – Retained by the New Jersey Board of Public Utilities to assess compliance with all Affiliate Compliance and Code of Conduct Rules enacted as a result of restructuring.

San Diego Gas & Electric – Project Manager on an assignment for the California PUC and SDG&E to review the implementation of Performance Based Ratemaking. This assignment included an assessment of financial, operational, performance and culture changes that were impacted by the two-year experimental program. While involved in this project, Mr. Drabinski developed an understanding of the SDG&E holding company formation and its interaction with the proposed industry restructuring.

New Jersey Board of Public Utilities – Director on major project to review hedging practices of the four gas distribution utilities in New Jersey. Working with Pace Energy as a sub-contractor,



Resume of Walter P. Drabinski

alternate hedging strategies were developed and proposed using more advanced techniques, including options.

Cumberland Valley Electric Cooperative – Performed a focused management audit of this small, rural cooperative. Worked with management to develop transition to new management team.

California Public Utilities Commission Telco Division (Attestation Exams) – Mr. Drabinski was the Project Director on seven separate assignments for the CPUC during the period of 2000 to 2002. These included:

- examinations of surcharge collections of “high cost fund” and “teleconnect fund” amounts for AT&T, Verizon, Sprint, and PacBell. In each project significant accounting, interpretational and transmittal errors were discovered, leading to the recovery of amounts well in excess of project costs;
- examinations of claims requests of “high cost fund” and “teleconnect fund” for Verizon, PacBell, and Roseville.

Indiana Power & Light – Vantage acted as the evaluator, at the request of the Indiana Utility Regulatory Commission, for a three-year program in which customer service and distribution system reliability are being monitored with penalties for missing targets. A major element of this program was enhanced vegetation control.

Arizona Corporation Commission – Provided assistance to the Commission Staff and Commissioners on all restructuring issues under consideration. This includes development of an ISO. The reorganization of cooperatives and G&Ts for deregulation. Development of solutions regarding high costs resulting from California related issues. Reassessment of deregulation orders based on appellate decisions.

BellSouth Telecommunications, Inc. – Project Manager on a review of BellSouth performance under an alternative regulation plan for the state of Kentucky. This is the first of nine states in which the Price Regulation Plan was up for renewal and, as such, was of great interest to the Company and regulators.

GTE of California and Contel of California (now Verizon) – Audited collection procedures and practices for various surcharge activities. Provided a CPA Opinion Letter, (through a subcontractor.)

US West – Provided assistance with quality control and final reviews of work product while an officer with the lead firm. This project reviewed affiliate transactions between parent and its subsidiaries. Assisted in development of model for cost allocation analysis.

Pennsylvania Governor Task Force – Provided input to Governor’s office, legislature and PUC on restructuring issues in the State. Issues included handling of stranded costs, securitization, the development of competition, and the education of consumers.



Resume of Walter P. Drabinski

Clean Air Action Corporation – Assisted in development of strategy regarding purchase and sale of emission credits throughout the Ozone Transport Region.

Duquesne Light Company – Project Manager for a comprehensive management and operations review for the Pennsylvania Public Utility Commission. Mr. Drabinski was also the Lead Consultant in the review of executive management, strategic planning, affiliated relations, and financial management.

Choptank Electric Cooperative – Lead Consultant on a management and operations review for this REA in the State of Maryland. Reviewed all aspects of operations including executive management, organization, construction management, electric operations, system planning, materials handling, purchasing, and customer service.

SDG&E, PG&E, SCE, and SCG – Project Manager on an audit of DSM administrative costs. Conducted for the CPUC CACD, this assignment took place during the period where working groups were assessing issues such as access to utility information and the future of DSM. Vantage provided feedback to a number of working groups on the needs of energy service companies.

Union Light, Heat and Power – Lead Consultant on a management and operations review for the Kentucky Public Service Commission. Responsibilities included all aspects of customer service and electric operations including: CIS; customer accounting; transmission & distribution; system planning; engineering; and construction. Also assisted in the review of the financial reporting relationship of the company to its parent, Cincinnati Gas & Electric, with an emphasis on allocation of costs.

Philadelphia Gas Works – Project Manager for a management and operations audit for the Philadelphia Gas Commission. Lead consultant for the review of corporate organization and staffing, customer services, operations, and support functions. Addressed major gas supply planning issues. Managed a series of three follow-up reviews including development of Management Audit Actions Plans, an Audit Compliance Review, and a Review of the 1993 O&M Budget. Testified at numerous Commission hearings on capital budget planning, automatic meter reading, office aggregation, and theft of service.

Maryland Public Service Commission – Consultant for an assignment to review long-term gas purchasing practices of Columbia Gas of Maryland, Baltimore Gas & Electric, and Washington Gas Light. Responsibilities included review of the 1988 plans, recommendations on requirements for future plans, and the training of commission staff personnel relative to conducting similar reviews of future plans.

Kentucky-American Water Company – Project Manager and Lead Consultant for a management and operations review for the Kentucky Public Service Commission. A key element of this audit was the holding company relationship with the many subsidiaries of American Water Works. Investigated the areas of customer service and marketing and engineering/construction.



Resume of Walter P. Drabinski

Pennsylvania Power Company – Lead Consultant on a management and operations review for the Pennsylvania Public Utility Commission. Responsibilities included review of customer services with a specific review of collection practices and policies, staffing, T&D, engineering, and system planning. Reviewed organization and staffing for the power production department.

Philadelphia Suburban Water Company – Lead Consultant/Project Manager on a comprehensive management audit for the Pennsylvania Public Utility Commission. Reviewed all aspects of field operations and water production.

General Waterworks Company - Pennsylvania Operations – Lead Consultant in a management and operations review. Reviewed compensation, benefits and staffing, executive management, organizational structure, and corporate policies and procedures.

General Waterworks Company - Pine Bluff Arkansas Operations – Project Manager on a management and operations review. Reviewed finance and accounting, staffing, system operations, organizational structure, and corporate policies and procedures.

General Electric Field Engineering group – Lead Consultant for the implementation of a Job Management Program that included seminars, teaching concepts on work breakdown structures, budgeting, performance measurement, and critical path scheduling techniques. Overall program was aimed at improving construction management skills of field personnel.

AFFILIATE TRANSACTION AUDITS

Duke Energy Ohio - Project Manager, in support of the Public Utility Commission of Ohio, for audit related to compliance with affiliate rules, merger compliance issues, cost allocation manual and transfer of assets between affiliates for the period of January 2008 through June 2009.

Duke Energy Indiana - Project Manager, in support of the Indiana RUC, for audit related to compliance with affiliate rules, merger compliance issues, cost allocation manual and transfer of assets between affiliates.

Duke Energy Kentucky - Project Manager for audit related to compliance with affiliate rules, merger compliance issues, cost allocation manual and transfer of assets between affiliates.

Lower Colorado River Authority – Project Manager for review of power plant cost allocations, development of cost allocation manual, and assessment of compliance with agreements with Austin Energy.

Entergy Corporation – Project Manager for a review of affiliated transactions between Entergy Corporation, Entergy Services, Inc., and a myriad of regulated and non-regulated subsidiaries. This engagement, performed for five regulatory agencies, is in response to the 1991 Settlement Agreement with the SEC, at which time the holding company was formed. The results of this



Resume of Walter P. Drabinski

audit included reallocation of almost \$5 million and a reconfiguration of reporting requirements.

Sempra Energy (SDG&E and SoCalGas) – Project Director for affiliated audit for 1998 and 1999 calendar years to verify compliance with California PUC restructuring requirements. Assignment included assessment of company plan and audit of affiliate transactions. Acted as the lead consultant on areas that addressed Nondiscrimination Standards, Disclosure and Information Standards, and Competitive Services. Recommendations from these reports addressed means of improving compliance.

PSE&G – Project Manager and Lead Witness for an audit of the Company’s Unbundling, Stranded Cost, and Restructuring plans and testimony. On this assignment, under the auspices of the New Jersey Board of Public Utilities, Vantage was the lead firm for a consortium of five consulting firms that addressed numerous critical and cutting edge issues. These included areas such as reconciliation of the regulatory and FERC books, development of cost of service studies, assessment of capital additions proposed for stranded cost recovery, calculation of market prices for energy and capacity, calculation of stranded costs associated with nuclear, fossil and non-utility generation, assessment of securitization as a mitigation option, and development of a comprehensive model that determined the possible rate reduction that could be achieved.

Pacific Gas & Electric Co.– Project Director for affiliated audit for 2001, 2002, 2003, 2004 and 2005 calendar years to verify compliance with California PUC restructuring requirements. Assignment included assessment of company plan and audit of affiliate transactions. Acted as the lead consultant on areas that addressed Nondiscrimination Standards, Disclosure and Information Standards, and Competitive Services. Recommendations from these reports addressed means of improving compliance.

Public Service Electric & Gas Company – Retained by the New Jersey Board of Public Utilities to assess compliance with all Affiliate Compliance and Code of Conduct Rules enacted as a result of restructuring.

POWER GENERATION, CONSTRUCTION MANAGEMENT, AND ENGINEERING

Kansas City Power & Light Iatan 1&2 – At the request of the Kansas Corporation Commission (KCC) Staff, provided oversight of the \$500 million installation of an Air Quality Control System (AQCS) on the existing (KCP&L) Iatan Unit 1and monitored construction of the \$2 billion Iatan Unit 2 coal fired, supercritical power plant. Reviewed organization, cost, schedule, project controls, contractor performance, contract monitoring, site conditions, and other key attributes associated with a mega-project. Provided regular assessments to the KCC on progress and risks, monitored startup and acceptance testing, and provided testimony in rate cases for both Iatan 1 and 2, with recommendations for almost \$240 million in prudence disallowances.



Resume of Walter P. Drabinski

North West Energy – Mill Creek Station – Monitored the construction of this three-unit 150 MW combustion turbine power plants for the Montana Public Service Commission. Visited construction site on a regular basis and provided input to the construction team as well as the Montana PSC. Reviewed quarterly reports and testified before the Commission after each report. Provided insight on In-service criteria testing and other key design and operational elements.

Philadelphia Electric Company – Lead Consultant on a retrospective investigation of the Limerick Nuclear Power Plant. Analyzed the Company's financial condition during the construction program and reviewed construction management practices on the project. Prepared testimony for prudence hearings on construction management and financial performance.

Public Service Electric & Gas Co. – Project Manager for a retrospective investigation of the Hope Creek Nuclear Plant. Prepared cost reconciliation that identified reasons for cost overruns. Reviewed construction control tools, productivity results, and analyzed productivity programs for effectiveness. Wrote testimony, answered interrogatories, and assisted in cross-examination of witnesses. Made recommendations on cost tracking systems for future construction projects.

California Independent System Operator – FERC - Project Director on an Independent Operational Audit of the CAISO for the period of October 2001 through October 2002. Analysis involved all aspects of the CAISO interface with power plants and transmission systems in California and the western portion of the US. This assignment was performed at the request of the FERC and led to a series of five global recommendations. Shortly after the completion of the audit, Mr. Drabinski testified before the House of Representatives, Subcommittee on Subcommittee on Energy Policy, Natural Resources & Regulatory Affairs.

Massachusetts Municipal Wholesale Electric Utility (MMWEC)– Performed analysis on options for equipment upgrades and construction requirements at major power plant and performed limited life extension analysis. Assisted with economic analysis on new generation sources.

PJM Power Plant Arbitration – Provided testimony and technical assistance on arbitration for an independent power plant built in the PJM region. Issues involved interpretation of PJM rules and contractual issues such as commercial operation date and performance guarantees. Assesed operational completion and capability.

St. Vincent Energy Services Ltd. - At the request of the Board of Directors and Prime Minister, Vantage conducted a review of system reliability and fuel procurement for the utility generation sources. Significant findings resulted in a new strategic plan, a reorganization of management and a legal investigation into procurement practices. Made numerous recommendations related to the economics of refurbishment of older units and the construction of new generation sources.



Resume of Walter P. Drabinski

Public Service Electric & Gas – Engagement Manager during a long-term engagement with PSE&G. Specific assignments he directed are listed below.

- Developed a 30-year environmental plan, addressing power generation and environmental strategy.
- Assisted in development of innovative rate strategy for Bergen combined cycle unit.
- Worked on a team of utility employees, lobbyists, legislative staff members and the DOE to develop a program for voluntary reduction of CO₂ and global warming initiatives.
- Reviewed gas procurement strategy for 1300 MW of combine cycle generation.
- Conducted a tactical and strategic alternatives study of the Company's fleet of 158 combustion turbine generation plants.
- Developed a plan for complying with the 1990 Clean Air Act Amendments.
- Assisted in a study of the 1992 Energy Policy Act and prepared a report that illustrated how it would impact company operations.
- Wrote and supported testimony in the area of fossil generation on behalf of the Company in a major rate case.
- Developed protocols for NO_x emission trading within NESCAUM.

Colonial Chemical Company – Assisted in identifying candidates for Selective Non-Catalytic Reduction systems to reduce nitrous oxide emissions from power plants throughout the east coast and Midwest.

Houston Light & Power – Consultant on South Texas Nuclear Project retrospective analysis. Reviewed construction management procedures and developed testimony for rate case.

Public Service Electric & Gas Co. – Project Manager for a review of the Engineering & Construction Department budgeting and approval process for capital projects at PSE&G. Developed flowcharts and improved methods for processing capital budgeting requests.

Honeywell/Allied Signal – Provided strategic assistance and research in development of commercial fuel cell. Conducted market research and facilitated meetings with utilities interested in commercial development.

Operation Project Engineer for Niagara Mohawk Power Corporation. Participated in conceptual system design, construction management, and plant start-up of power plants, transmission lines, switchyards and plant electrical equipment.

- Assisted in design and then installation of new boiler control technology associated with conversion of four – 100 MW units from coal to oil in 1972.
- Provided design review and input on two 850 MW oil fired units (Oswego 5-6)
- Represented utility during acceptance testing, start-up, and turnover of all electrical power systems, auxiliary equipment, and turbine and boiler instrumentation and control systems for the Oswego 5 – 850 MW oil fired unit which went commercial in 1975.



Resume of Walter P. Drabinski

- Monitored construction of two new switchyards, installation of two-115 KV underground transmission lines and three-345 KV overhead transmission lines.

OTHER BUSINESS AND PROFESSIONAL EXPERIENCE

System Training Director for Niagara Mohawk Power Corporation. Managed a staff of eleven supervisors and instructors, as well as numerous contractors and part-time training personnel. Developed and implemented a productivity program to improve operating and employee productivity at all fossil power plants. Developed a performance-based progression program for craft personnel and assisted in negotiating contract changes with the International Brotherhood of Electrical Workers. Member of Electric Power Research Institute committee on power plant staffing and training. Chaired Electric Utility Technical Education Council. Developed and taught a seminar on power plant efficiency improvement to operating, management, and regulatory personnel.

Electrical Maintenance Supervisor for Niagara Mohawk Power Corporation. Managed two supervisors and thirty electricians performing electrical construction, maintenance, and repair. Developed and implemented a preventive maintenance program for a six-unit/2000 megawatt power plant. Managed roving maintenance crew, providing personnel, equipment, and expertise to nuclear power plants during outages. Responsibilities included all plant, fuel handling, and pollution control electrical equipment, switchyards, 345 kV overhead and 115 kV underground transmission lines, relay systems, telemetering, and telecommunication systems.

TESTIMONY

Testimony was provided in the following cases.

- Cases 09-246 and 10-1025 for the Kansas Corporation Commission. Provided direct testimony on prudence of construction for Iatan 1 and Iatan 2 coal fired power plants.
- Montana PSC – Testify quarterly in results of monitoring Mill creek power plant construction project.
- Case 99-434 Bell South of Kentucky. Audit and modification of Price Regulation Plan.
- Maryland PSC – Testified approximately 20 times on Provider of Last Resort (POLR) rules, regulation and energy solicitation results.
- Duquesne Light Company – Testified six times regarding POLR solicitations.
- CPUC Telco cases – Testified on eight occasions regarding results of attestation exams of Verizon, PacBell, Sprint, AT&T, and Roseville.
- Various energy solicitation projects – Testified after acting as independent monitor during energy solicitations in Delaware (2 occasions)
- Commonwealth Edison – Testified before Illinois PSC on outages of 1999.
- PSE&G Restructuring hearing. Lead witness on all aspects of unbundling, restructuring, stranded costs, and deregulation issues.



Resume of Walter P. Drabinski

- Case No. 97-105-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Dayton Light Company for the PUC of Ohio.
- Case No. 95-106-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Monongahela Power Company for the PUC of Ohio.
- Case No. 96-106-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Monongahela Power Company for the PUC of Ohio.
- Case 93-02-041 Financial Audit of the Demand-Side Management Pilot Bidding Program Administrative Services of Pacific Gas & Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company for the California PUC.
- Case D94-08-023 Mid-Point Evaluation of SDG&E's Base Rates Performance Based Ratemaking Mechanism for the California PUC.
- Case No. 94-219-GA-GCR Management Performance Audit of West Ohio Gas Company for the PUC of Ohio.
- Case No. 91-103-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Toledo Edison for the PUC of Ohio.
- Case No. 91-104-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Cleveland Electric Illuminating Company for the PUC of Ohio.
- Case No. 89-100-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Ohio Power Company for the PUC of Ohio.
- Case No. 89-101-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Columbus Southern Company for the PUC of Ohio.
- Case No. 90-100-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Ohio Power Company for the PUC of Ohio.
- Case No. 90-101-EL-EFC Management Performance Audit of Fuel Related Policies and Practices of Columbus Southern Company for the PUC of Ohio.

PUBLICATIONS

Primary contributing author of five textbooks developed for the Electric Power Research Institute (EPRI) and the Center for Occupational Research and Development (CORD).

- Introduction to Instrumentation and Control.
- Electronic and Pneumatic Control Devices.
- Control Systems I.
- Control Systems II.
- Power Plant Control System Applications.

EDUCATION

MBA, The Wharton School, University of Pennsylvania, (Finance/Management).
BSEE, State University of New York at Buffalo, (Systems Engineering/Power Technology).
Lectured as a visiting executive at Clarkson College on management in a utility company.



Resume of Walter P. Drabinski

PROFESSIONAL AFFILIATIONS

Institute of Electrical and Electronic Engineers.
Project Management Institute.
American Water Works Association



RESUME OF MICHAEL C. BOISMENU PE

RELEVANT CREDENTIALS

Through the past 46 years he has been actively involved with all phases of the electric power industry. He has successfully completed major design engineering projects, managed multi-disciplined construction projects, managed a large coal fired power plant, managed regional generation assets, and most recently provided consulting services to a variety of power industry clients. His specific power industry related experience includes the following and is further detailed below.

- Selected Consulting Experience
- T & D System Optimization
- Plant Management and Operation
- Asset Management

SELECTED CONSULTING EXPERIENCE

Virgin Islands Power & Water Authority (2014-15) - Diagnostic audit of this electric and water utility that is facing serious financial, operational and infrastructure problems. Vantage, conducted a diagnostic audit which then focused on staffing, infrastructure, strategic planning, and other key issues. A broad range of recommendations were developed including changes to the electric power supply, staffing, and transmission and distribution enhancements.

EPRI Plant Maintenance Planning (2014) – Performed research throughout fossil industry and prepared a report on the status of non-outage power plant planning practices. Included analysis of software systems currently utilized.

Louisville Gas & Electric (2010 – Present) - Provided the independent monitoring of \$1 Billion air emission projects at impacted power plants to enable the Company to meet current EPA regulations.

Kentucky Utilities (2010 – Present) - Provided the independent monitoring of \$1 Billion air emission projects at impacted power plants to enable the Company to meet current EPA regulations.

North West Energy - Mill Creek Station (2010-12) – Monitored the construction of this three-unit 150 MW combustion turbine power plants for the Montana Public Service Commission. Visited construction site on a regular basis and provided input to the construction team as well as the Montana PSC. Reviewed quarterly reports and testified before the Commission after each report. Provided insight on the In-service criteria and testing and other key design and operational elements.

Lower Colorado River Authority Audit of Affiliate Relations (2010) – Project Manager for review of power plant cost allocations, development of cost allocation manual, and assessment of compliance with agreements with Austin Energy.



Resume of Mike Boismenu

Kansas City Power & Light Iatan 1&2 - (2008-11) At the request of the Kansas Corporation Commission (KCC) Staff, provided oversight of the \$500 million installation of an Air Quality Control System (AQCS) on the existing (KCP&L) Iatan Unit 1 and monitored construction of the \$2 billion Iatan Unit 2 coal fired, supercritical power plant. Reviewed organization, cost, schedule, project controls, contractor performance, contract monitoring, site conditions, and other key attributes associated with a mega-project. Supported the regular assessments to the KCC on progress and risks, monitored startup and acceptance testing, and provided testimony in rate cases for both Iatan 1 and 2, with recommendations for almost \$240 million in prudence disallowances.

OTHER BUSINESS AND PROFESSIONAL EXPERIENCE

Plant Management and Operations:

- Provided total asset management and leadership for the Station in the evolving electric supply business;
- Instrumental in the successful negotiation and settlement of the long-standing real estate tax litigation case with the City of Dunkirk. Resulted in savings of **\$80 million** through the term of the agreement;
- Improved the overall image of the Company through participation in Chautauqua County Reengineering Initiative and the associated Implementation Steering Committee. The initiative resulted in a significant reduction in the size of the County government's Executive Staff;
- Provided the leadership to successfully transition the workforce of the power plant from the regulated electric generation business to a non-regulated electric generation environment;
- Through targeted attrition and position abolishment's reduced the staffing level of the power plant from 208 to 125 employees. This coupled with innovative partnering agreements with vendors resulted in a reduction of the Station's Operation and Maintenance budget by 45% from the previous year's level;
- Provided the organizational design to complete the safe and effective complete of the NRG Dunkirk Power Plant from eastern coal to PRB coal.

T & D System Optimization:

- As the Engineering Standards Director developed materials and methods to optimize the safety, reliability and efficiency of the Niagara Mohawk T&D System. Included the automation of the T&D Engineering Standards development process and integrated the standards with the Work Management System.



Resume of Mike Boismenu

Asset Management:

- Provided an assessment of the NRG Big Cajun II operation and maintenance process. Resulted in a significant improvement in availability and a more functional and responsive organization design;
- As the Regional Director of Operations in the NRG Mid-Atlantic Region. Completed an assessment of the operation and maintenance practices and made recommendation and implemented a combination of Station physical, organizational and employee development and improvement programs all of which contributed to the significant reduction in the NRG Indian River Station's forced outage rate;
- As the Regional Director of Operations for the NRG New York Region, developed the Regional plan for emergence from bankruptcy, redirected the Region to assure appropriate input from each generating facility.

EDUCATION

- Associates Degree in Applied Science – Erie County Technical Institute;
- Lemoyne College – MBA in progress;
- New York State Professional Engineer – 1987;
- Significant in-service professional training.



RESUME OF MARK D. FOWLER, BS, MBA

SUMMARY OF QUALIFICATIONS

Mr. Fowler has over 25 years of experience in the electric, gas, water and telephone industries as both a management consultant and employee. His functional expertise in the electric industry includes reliability, emergency restoration, power plant construction and maintenance, customer service and support services. He has recently worked with a large Midwestern investor-owned electric utility to develop an Emergency Response Plan and Organization. Mr. Fowler was formerly a senior consultant for the utility consulting practices of RCG/Hagler, Bailey, Inc., and Impell Pacific, Inc. He has performed numerous consulting assignments in the utility industry related to reliability, emergency response, operational improvements as well as other topics in the electric industry. He has a B.S. and an MBA from the University of Tulsa with emphasis in Operations Research.

Utility Management Audit Experience

Niagara Mohawk - Lead consultant for work management on the management audit of Niagara Mohawk for the New York PSC.

Ohio PUC - Lead consultant for the state-wide review of the credit and collection practices of the four Ohio gas utilities for the Ohio PUC.

Southern Connecticut Gas - Lead consultant in a review of Southern Connecticut Gas for the Connecticut DPUC. Responsible for review of the non-regulated charges to the operating company and for the review of the support-services and operations functions including work planning, materials, purchasing, MIS, and facilities.

Potomac Edison - Consultant for a management and operations audit of the manpower planning, productivity, and staffing functions of Potomac Edison for the Maryland PSC. Focused on all areas, including contractors, distribution and plant fuel procurement.

Belize Electric - Lead Consultant on an 18-month process reengineering and organizational review of Belize Electric. The review addressed organizational realignment and process improvements in new service installation, emergency preparation, materials management, distribution, and computer systems.

South Jersey Gas - Conducted an operational improvement project for South Jersey Gas which examined all aspects of the field operations and dispatch.

Yankee Gas Services - Consultant in a management review of Yankee Gas Services for the Connecticut DPUC. Areas included construction, maintenance and support services.

Central Hudson Gas & Electric Corporation - Consultant on management audit of Central Hudson Gas & Electric Corporation for the New York PSC. Areas of review included corporate budgeting and the management of contractors.



Resume of Mark Fowler

Southern Connecticut Gas - Lead consultant for support services on the management audit of Southern Connecticut Gas for the Connecticut DPUC.

Southern California Gas - Consultant on two management reviews of Southern California Gas performed for the California PUC. Areas of review included affiliate transactions and relationships, gas transmission and distribution, engineering, and construction.

Connecticut Natural Gas - Lead consultant for support services for Connecticut Natural Gas in a comprehensive management review for the Connecticut DPUC. Review included charges from the parent company to subsidiary operations.

California ISO - Lead Consultant on a FERC mandated audit of the California ISO following the California Energy Crisis.

Pacific Gas & Electric - Directed a review of the affiliate transaction compliance of Pacific Gas & Electric.

SEMPRA - Conducted two affiliate reviews of SEMPRAs in which the focus was on the gas trading, purchasing, storage, transmission and storage operations of Southern California Gas, San Diego Gas & Electric and their affiliates.

Potomac Electric Power Company - Consultant on a management audit of the fuel procurement activities of Potomac Electric Power Company for the Maryland PSC. Areas of review included fuel inventory management, gas and oil procurement, transportation, and storage.

Pacific Gas & Electric - Reviewed the gas operations of Pacific Gas & Electric. This review included intrastate pipeline operations, scheduling, systems used for scheduling gas shipments, trades and storage arrangements.

Emergency Restoration Consulting Experience

New Hampshire electric utilities - Lead consultant on a review of the response of four New Hampshire electric utilities and two telephone utilities to the ice storms of 2009. This extensive review included the emergency response organizations, emergency response preparations, procedures and processes, communications, actions and actual response. It involved not only utilities but state and local government officials.

Midwestern utility - Lead Consultant on an assignment to develop an Emergency Response Organization and Emergency Response Plan at a large Midwestern utility. This two year multi phase assignment included initially assisting the company in responding to audit interrogatories and then helping the company to establish a new emergency response plan and organize a new emergency response organization. This project involved extensive communication and data gathering with other utilities, as to their emergency operations.



Resume of Mark Fowler

Commonwealth Edison - Lead Consultant on an audit of the Emergency Response of Commonwealth Edison to the storms of 2006. Mr. Fowler reviewed the OMS and SCADA systems and usage, the organization, community communication and customer service responses.

Consolidated Edison - Lead Consultant on a review of a series of major outages which impacted Consolidated Edison in substations, underground cables and transformers. These outages were ultimately found to be specifically unrelated but pointed to systemic issues in repair and replacement.

Indianapolis Power and Light - Lead consultant on a three year review of the emergency response performance of Indianapolis Power and Light (IP&L). Initiated as an audit of IP&L response to a series of tornados, the project continued to monitor the performance of IP&L as well as their implementation of audit recommendations over a three year period.

Emergency Response - Reviewed emergency response as a part of broader audits and projects including Central Hudson, Belize Electric Limited, Guam Power, Aqualectra (Curacao owned electric utility)

Water Utility Experience

New Jersey American Water - Lead consultant on a recently completed management audit of New Jersey American Water (NJAW). Mr. Fowler's portions of the audit included all support services including legal, fleet, security, purchasing, materials management, real estate, risk management and IT. He was also responsible for reviewing all field operations and the specialized topics of contractor management and work management. The audit included the relationships of NJAW with corporate and AECS operations which perform many of the NJAW daily functions.

City of Corpus Christi - As part of a larger review of all city services, Mr. Fowler was responsible for reviewing plant operations, distribution, laboratories and customer service. The audit identified numerous opportunities for reducing redundant and overlapping services.

City of Colorado Springs Municipal Utilities - Mr. Fowler was Engagement Director on a series of studies for the electric, gas, water and wastewater utilities of the city of Colorado Springs. The studies looked at the management of work especially coordination between utilities for overlapping projects. Another of the studies examined possibilities for consolidating or better coordinating the supply chain function.

WORK EXPERIENCE

Independent Consultant (1990-2000, 2001-2008)

Director Business Development-North America-Hansen Ind, Melbourne, Australia (2000-01)

Senior Consultant RCG/Hagler Bailly (1989-1990)



Resume of Mark Fowler

Senior Consultant Impell Pacific (1986-1989)

Senior Financial Manager- Plains Electric Generation and Transmission (1985-1986)

Director Gas Trading and Distribution- Western US- Buckeye Gas Products (1979-1985)

OTHER RELEVANT EXPERIENCE

Formally trained in Incident Command as part of Wildland Firefighter Training

Member of the International Society of Arborist.

EDUCATION

MBA, The University of Tulsa

BS, The University of Tulsa



RESUME OF JEAN A. GORMLEY, BS, MA

BACKGROUND

Jean Gormley joined Vantage Energy Consulting LLC in April 2013 as owner and CEO. Since that time she has been involved in every proposal and project. Jean has over 25 years' experience as a business owner and manager with a broad range of technical and administrative talents. Her education lends itself to analytical and meticulous care in coordination of projects, large and small. Jean has a Bachelor's Degree in Professional Studies and a Master's Degree in Science. She has a diverse background which includes work in the consulting, medical and fitness industry. Her education and related experience have given her the skill set for extensive research capabilities, critical thinking, financial management, coordination and scheduling, as well as the ability to meet deadlines in an appropriate fashion. In the eight years she has been with Vantage, her capabilities have grown exponentially.

WORK EXPERIENCE

- **VEC Project Administrator** – duties include proposal submission, contract administration, assignments, Consultant coordination, project, interview and travel scheduling, data request submission and coordination, invoicing, report editing and submission on the following projects:
 - Virgin Islands Water & Power Authority Management Audit
 - Westar-KCP&L Merger
 - Fuel Audit Services for Entergy Mississippi and Mississippi Power Company
 - Audit Power Purchase Agreement Rider Ohio Power Company
 - Audit of Connecticut Natural Gas
 - Grayson RECC Focused Management and Operations Audit
 - Compliance Audit Ohio Power DIR
 - Long Island Power & Light Utility Consulting Services
 - Audit of the Reconciliation Rider of Dayton Power & Light
 - City of Lake Worth ongoing assistance with Energy Contracts, Power Supply Planning and Extension of Staff
 - LIPA Isaias Review
 - Trans Bay Cable & Horizon West Transmission Affiliate Compliance Review
 - NERC Audit support of a major Northeast US Electric Utility.
 - Peer Utility Organization and Structure Comparison for a major Northeast US Gas Utility.

- **Marketing** – Performs detailed research on business opportunities in Vantage's core areas, website administration and company literature development. Women Business Enterprise coordination and development.
- **Human Resources** – Consultant management and coordination. Coordinates use of consultants and subcontractors. Prepares and approves compensation agreements.
- **Proposal Development** – Lead on development of proposals. Utilizes her analytical experience to prepare proposals in all Vantage business areas.



Resume of **Jean Gormley**

- *Technology Administrator* – Assumes responsibility for telecommunications and IT activities as used in a customer service realm.
- *Industry Research* – Conducts research on emerging issues, corporate problems, and regulatory developments.

EDUCATION

- Tri-State College, New York, Master’s Degree
- Temple University, BS Social Science

