

# Louisiana Public Service Commission

Request for Certification of the Construction of the Bayou Power Station, Including Cost Recovery





May 3, 2024

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#### RE: RFP 24-02, Docket U-37131, Entergy Louisiana, LLC, ex parte. In re: Request for Certification of the Construction of the Bayou Power Station, Including Cost Recovery

GDS Associates, Inc. appreciates the opportunity to respond to the Request for Proposal RFP 24-02 for outside consultant to represent the Louisiana Public Service Commission ("Commission") in Docket U-37131, Entergy Louisiana, LLC, ex parte. In re: Request for certification of the construction of the Bayou Power Station ("BPS"), including cost recovery (referred to as "RFP" for remainder of this document). GDS has assembled a highly experienced and diverse project team with the experience, skills, and resources that are necessary to assess Entergy Louisiana, LLC (Entergy) proposal to construct BPS. GDS has performed similar prudency assessments for I other power generation facilities in other regulatory proceedings. GDS is currently performing a similar scope of work for the North Dakota Public Service Commission in advanced determination of prudence cases for life extension of the Monticello Nuclear Plant and the new Sherco 3 Solar Project

GDS is a multi-service consulting and engineering firm formed in 1986 that now employs a staff of more than 180, in nine office locations across the U.S. Our consultants are recognized leaders in their respective fields, are dedicated to their clients, and known for consistently being available when needed. Our broad range of expertise focuses on clients associated with, or affected by, electric, gas, water and wastewater utilities.

GDS has examined all parts of the RFP, including the proposal requirements, submittal instructions, and Entergy's application and testimony. As outlined in this proposal, GDS is well positioned to assist and support the Commission with this project, as illustrated by our extensive experience and references outlined in this proposal. GDS has reviewed the Commission's conflict of interest rules and has no conflict of interest associated with performance of the scope of work contained (SOW) in the RFP.

Thank you again for this opportunity and we look forward to answering any questions you might have regarding our proposal and our team's experience and qualifications. Richard Polich will serve as project manager and single point of contact for further communication regarding the submitted proposal, and his email address and telephone number are as follows:

Email: richard.polich@gdsassociates

Phone: 501-316-9805

We look forward to continuing work with the Commission on this project.

Sincerely,

lack Madden, Senior Vice President









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# 1 Proposal Summary

This proposal has been crafted to supply all services referenced in RFP Section II, Scope of Representation. GDS has assembled a team of consultants which have the capability to analyze Entergy's application and filed testimony in Commission Docket U-37131. GDS will provide the Commission with an assessment of the value of the BPS project to Louisiana and its ratepayers, determine if the construction of BPS is the most prudent option, and if the project costs are an economical choice. In addition, GDS is prepared to supply post-certification monitoring throughout the construction of BPS.

GDS has organized its consulting efforts into five tasks to provide the Commission effect project control, to allow Commission Staff to adjust project scope as needed, and to control project costs. The project tasks are as follows:

- 1. Task 1: Entergy Application Review and Assessment
- 2. Task 2: Discovery
- 3. Task 3: Testimony Preparation
- 4. Task 4: Hearing Participation and Brief Support
- 5. Task 5: Post-Certification Monitoring

Based on GDS Teams initial review of Entergy's application and associated testimony, The key issues in this Docket are as follows:

- 1. The cost of BPS,
- 2. The need for its generation,
- 3. What alternatives to BPS were consider and what are those alternative costs,
- 4. How Entergy expects to operate BPS, and
- 5. Should exemption from Market-Based Mechanisms ("MBMM") requirements be granted.

GDS has extensive, recent experience with the evaluation of new generation projects for other clients which will enable GDS to determine if the BPS costs are consistent with other new generation projects utilizing reciprocating internal combustion engines ("RICE") and if alternative options would be a better choice. In addition, GDS's experience in preparing and evaluating integrated resource plans ("IRP") for other clients will enable GDS to effectively evaluate Entergy's need for BPS. This will include review of transmission and/or distribution changes that could provide the same level of electric reliability as Entergy espouses BPS will do, at cheaper cost. Using this expertise provides GDS experience to quickly evaluate Entergy's application and testimony, obtain additional information from Entergy through data requests, evaluate the information provided, and present the Commission Staff recommendations on testimony content.

GDS has outlined in Task 5, a proposal for performing post-certification monitoring, if required by the Commission. Based upon other post-certification Entergy reporting, GDS's proposal has strucutred its post-certification monitoring on Entergy providing quarterly reports and a final monitoring report for the BPS project.

Communication is a critical component of GDS Team's participation in regulatory proceedings. GDS proposes the following communication plan to coordinate the Commission Staff and GDS Team throughout the regulatory process in Docket No. 37131.

- 1. Project Kick-off Meeting to set expectations and initial project schedule.
- 2. Biweekly coordination meetings to review key issues, project schedule, and status of activities.
- 3. GDS Team participation in various informal conference calls, meetings, and conferences.
- 4. Participation in Commission B&E meetings as requested by Commission.

GDS will commit to performing the SOW contained in this proposal for a not to exceed cost of \$116,300, of which \$82,350 is associated with the regulatory proceeding and \$33,920 is for post-certification monitoring.

# **2** Scope of Work Strategy

GDS has reviewed the SOW contained in Section II of the RFP. GDS has also reviewed Excel's filing in Docket U-37131, dated March 5, 2024, and the provisions of the Commission's General Order dated September 20, 1983 (the 1983 General Order), and subsequent amendments. Based upon these documents, GDS understands the SOW for this project to be as follows:

- 1. Review and assess Entergy's application and testimony filed in Docket No. 37131.
- 2. Identify key issues in the Entergy's application.
- 3. Draft and in the development of data requests.
- 4. Review and analyze responses to data requests.
- 5. Participation in status conferences, pre-trial conferences, depositions, and hearings.
- 6. Draft and prepare prefiled testimony and exhibits.
- 7. Review and assess any Entergy rebuttal testimony.
- 8. Draft and prepare any cross-answering testimony.
- 9. Assist Commission Staff in preparation of cross examination of witnesses.
- 10. Support Commission Staff's drafting of pleadings, motions, and briefing sheets.
- 11. Participation in all conference calls, meetings, and conferences.
- 12. Live participation of GDS personnel to present testimony and at required Commission hearings.
- 13. GDS will also provide post-certification monitoring services ("Monitoring"), including:
  - a) Review of monitoring plans,
  - b) Draft and assist in drafting data requests,
  - c) Analyze data responses,
  - d) Participation in calls and meetings associated with Monitoring,
  - e) Provide a report on the Project completion based on Energy's Monitoring Reports.

GDS is well equipped and has personnel with the expertise to provide the Commission with a thorough Entergy's Application, and on Entergy's basis for requesting an exemption to the 1983 General Order requirements for the Commissions MBMM provisions.

#### 2.1 DOCKET NO. U-37131 OVERVIEW

Entergy's is seeking approval and certification for construction of for construction of a new 112-megawatt (MW) generation project, to be called the Bayou Power Station. This plant is proposed to be located in Leeville, Louisiana. Entergy states the application is filed under the 1983 General Order provisions and is requesting an exemption from the MBMM provisions of the 1983 General Order.

Based on GDS Teams initial review of Entergy's application and associated testimony, the cost of BPS, the need for its generation, what alternatives were considered, alternative costs, how Entergy expects to operate BPS, and should exemption from MBMM requirements be granted, are the key issues in this proceeding. GDS has extensive, recent experience with the cost of new generation due to its evaluation of new generation projects for other clients. This experience will enable GDS to determine if the BPS costs are consistent with other new generation projects utilizing reciprocating internal combustion engines ("RICE") and in determining if other types of generation could be better suited. In addition, GDS's experience in preparing and evaluating IRPs for other clients will enable GDS to effectively evaluate the Basis for Entergy's need for the BPS and if alternative options could be better suited and lower cost. In addition, GDS has extensive experience with electric transmission and distribution structure in Louisiana due to its work with other clients and will use this knowledge to evaluate the potential for transmission and/or distribution changes to provide the same level of electric reliability as Entergy espouses BPS will do, at cheaper cost. Using this expertise provides GDS experience to quickly evaluate Entergy's application and testimony, obtain additional information from Entergy through discovery requests, evaluate that information, and present the Commission Staff recommendations on testimony content.

#### 2.2 PROJECT FOCUS

GDS teams review of Entergy's application and testimony finds the SOW for this effort will focus on providing the Commission answers to the following two key issues:

- 1. Is the Bayou Project necessary, has Entergy selected the most economic option for Louisiana, and is the impact on Entergy's Louisiana customers justifiable?
- 2. Is Entergy's basis for requesting exemption from with the MBMM requirements of the 1983 General Order justifiable, reasonable, and does it follow best utility practice?

#### 2.3 PROJECT ACTION PLAN

The Project Action Plan is designed to provide critical information to the Commission Staff on GDS Team's findings early in the project. This enables the Commission Staff to control the project flow and the project costs. GDS will organize the project into various tasks, each of which has establishing communication frequency, and defined deliverables for each task. GDS proposes to organize this project into the following tasks:

- 1. Task 1: Entergy Application Review and Assessment
- 2. Task 2: Discovery
- 3. Task 3: Testimony Preparation
- 4. Task 4: Hearing Participation and Brief Support
- 5. Task 5: Post-Certification Monitoring

The Action Plan shown in *Figure 2-1* covers the Scope of Representation outlined in the RFP. Please note that we expect there to be an overlap between the tasks over the course of the project.

FIGURE 2-1: GDS ACTION PLAN

#### 2.4 PROJECT TASKS AND DELIVERABLES

**APPLICATION** POST-**HEARING ASSESSMENT TESTIMONY DISCOVERY SUPPORT CERTIFICATION**  Entergy Appliaction (if Needed) **MONITORING** Assist Cross ExaminationBrief, Pleadings, Motions Review Monitoring PlansData Request Support & Review Entergy Rebuttal Support Depositions (if necessary) Participation in meetings, Commission B&E, and Other Meetings Requirements <u>Deliverable</u>: Define Deliverable: Testimony Assessment of Bayou Testimony Issues and <u>Deliverable</u>: Project Completion Report Positions Deliverable: Assessment

#### **Task 1: Application Assessment**

GDS will review Entergy's application and testimony to determine if Entergy's approach to the Bayou Project complies with Commission and regulatory requirements, and if the Bayou project is in the best interest of Louisiana ratepayers. The Task will begin with a kickoff meeting with Commission Staff to establish the scope of review, key issues, and project schedule. The GDS Team will then proceed to review Entergy's application to determine if additional information is needed to complete assessment of Entergy's application.

<u>Deliverables</u>: GDS Team will provide Commission Staff with an initial assessment of Entergy's application, identify additional information needs, and recommend next steps.

#### Task 2: Discovery

GDS Team will draft data requests, support Commission Staff data requests, and analyze data responses in this task. GDS expects there to be two rounds of data requests regarding Entergy's initial testimony and one round of data requests on Entergy's rebuttal testimony. The GDS Team will support Commission Staff deposition of witnesses as necessary. GDS will incorporate the additional information obtained in the data requests into the analysis of Entergy's application to form a final assessment on the Bayou project's impact on Louisiana ratepayers and if the project is justifiable.

#### **Deliverables:**

- 1. Data Requests
- 2. Outline of issues to be addressed in testimony.

#### **Task 3: Testimony Preparation**

Should the Commission Staff determine that testimony is warranted, the GDS Team will prepare written initial testimony and exhibits. Once Commission Staff has agreed with issues to be addressed in the testimony, GDS Team will prepare draft testimony for Commission Staff review. Based on GDS experience with testimony in other proceedings like Docket No. U-37131, we are planning for two rounds of draft testimony and Commission Staff comments/edits. Responses to Entergy discovery requests and cross-answering testimony (if necessary) are part of this task. GDS also plans for two rounds of draft cross-answering testimony and Commission Staff review/edits.

#### **Deliverables:**

- 1. Initial Testimony and Exhibits
- 2. Responses to Discovery Requests
- 3. Cross-Answering Testimony & Exhibits (if necessary)

#### Task 4: Hearing Participation and Brief Support

This task includes all aspects of support for Commission Staff, including support with deposition, hearings, witness cross examination, preparation of briefs, and other regulatory proceeding tasks. This Task also includes GDS witness participation in regulatory proceedings and cross examination.

#### **Deliverables:**

- Commission Staff support with deposition, hearings, witness cross examination, preparation of briefs, and other regulatory proceeding tasks.
- 2. GDS witness attendance at hearings for cross-examination.
- 3. GDS remote participation in Business & Executive Meetings (B&E) and other required informal calls, meetings, and conferences.

#### Task 5: Post-Certification Monitoring

GDS Team is prepared to provide post-certification monitoring of Entergy's filings on BPS. Defining the cost for this Task is dependent on how many reports Entergy files, the length of BPS construction, and what information is filed by Entergy. Thus, GDS cost estimate for this Task is based upon the following post-certification monitoring plan SOW:

- 1. BPS Construction Period of 24 months.
- 2. Entergy files quarterly monitoring reports and a final monitoring report for a total of nine monitoring reports.
- 3. GDS analysis for each report and four data requests.

- 4. Conference call with Commission Staff after completion of GDS assessment of each Entergy monitoring report.
- 5. GDS will provide four evaluation reports on Entergy's monitoring report.

#### 2.5 COMMUNICATION PLAN

Communication is a critical component of GDS Team's participation regulatory proceedings. The RFP identifies requirements for GDS participation in informal conference calls, meetings, and conferences with not only the Commission and Staff, but also Entergy and any intervenors. This is also a part of the regulatory process GDS includes in SOW. GDS SOW also includes GDS Team remote participation in Commission's B&E meetings.

GDS proposes the following communication plan to coordinate the Commission Staff and GDS Team through the regulatory process in Docket No. 37131.

- 1. Project Kick-off Meeting to set expectations and initial project schedule.
- 2. Biweekly coordination meetings to review key issues, project schedule, and status of activities.
- 3. GDS Team participation in various informal conference calls, meetings and conferences, determined by Commission Staff.
- 4. Participation in Commission B&E meetings.

Our pricing is based on remote attendance at B&E meetings, but if required, GDS will work with Commission Staff to accommodate. Task 5, Post-Certification Monitoring will require different communications plan, and this has been outlined in Section 1.4.5.

#### 2.6 PROPOSED PROJECT SCHEDULE

The following proposed project schedule is based GDS experience with similar regulatory proceedings and assumes a 14-day turnaround in discovery responses. The proposed timing is sequential from the date of contract execution, up through testimony hearings.

**TABLE 2-1: PROPOSED PROJECT SCHEDULE** 

Proposed Timing (Weeks)	Efforts		
1	Kickoff Meeting		
3	1 <sup>st</sup> Data Request Draft		
4	Issuance of 1st Data Requests		
6	Entergy Response to 1st Data Request		
7	2 <sup>nd</sup> Data Request Draft		
8	Issuance of 2 <sup>nd</sup> Data Request		
10	Entergy Response to 2 <sup>nd</sup> Data Request		
13	Initial Testimony Draft		
14	Commission Staff Comments & Edits of Initial Testimony Draft		
15	Initial Testimony 2 <sup>nd</sup> Draft		
16	Finalize Initial Testimony & Exhibits		
17	Initial Testimony Filing		
18	Entergy 1 <sup>st</sup> Data Request		
20	GDS Responses to Entergy 1 <sup>st</sup> Data Requests		
21	Entergy Rebuttal Testimony Filed		
21.5	3 <sup>rd</sup> Data Request Draft		
22	Issuance of 3 <sup>rd</sup> Data Request		
24	Entergy Response to 3 <sup>rd</sup> Data Request		
25	Cross-Answering Testimony Draft		
26	Cross-Answering Testimony Filed		
30	Testimony Hearings Before ALJ		

# **Experience and Qualifications**

GDS Associates, Inc. ("GDS") is an industry-tried and proven consulting and engineering firm in the energy business, and our consultants have a significant record of serving the power sector with distinction across the United States.

#### 3.1 COMPANY BACKGROUND

Founded in 1986, GDS provides engineering and consulting services to electric utility clients across the country, covering a broad range of services in the areas of power supply planning, energy procuremt, risk management, fuels, wholesale and retail rates, cost of service, demand-side management, financial consulting, transmission planning, access and pricing, generation development and monitoring, and many others. Cooperatives, municipal systems, and regulatory agencies make up most of GDS' clients, and we gear our business toward being able to provide the multitude of services that those entities need all "under one roof". With GDS offices located across the U.S., as shown in Figure 3-2, GDS serves a diverse client base with a variety of energy consulting services, as well as information technology, market research, and statistical services.

#### 3.2 CORPORATE CORE **VALUES MISSION** & **STATEMENT**

The size and depth of GDS permits us to offer clients multiple

sources of assistance, ensuring complete, competent, and timely service. GDS' long history of meeting client needs has established our reputation within the industry. In fact, most of our project assignments are derived from repeat work for existing clients or from client referrals. GDS recognizes that no two clients or problems are exactly alike, so we strive to deliver "right-fit" solutions for

each client's situation. GDS conducts its business in accordance with stated core values and our mission statement which we follow steadfastly in providing services to our clients. We understand that our clients want to get it right the first time. Our goal is to be a wise investment for you, while ensuring the consistent quality that is the

foundation of our long-term relationships.

# **GDS ASSOCIATES**

The GDS MISSION is to "help our clients succeed by anticipating and understanding their needs and by efficiently delivering quality services with confidence and integrity."

GDS is a multi-service consulting and engineering firm formed in 1986 and currently has clients in 45 states and Canada and has seen revenue grow from \$19.7 million in 2005 to over \$47 million in 2021. Over that same period the number of employees has increased from 118 to over 190.



#### 3.3 CORE BUSINESS

GDS consultants are recognized leaders in their respective fields, dedicated to their clients, innovative in their approach to meeting unique challenges, and known for consistently being available when needed. Our comprehensive range of expertise focuses on clients associated with, or affected by, electric, natural gas, water and wastewater utilities. In 2022, we provided consulting services for over seven hundred clients.

**Figure 3-1** provides a list of consulting areas in which GDS has specialized skills. For more information regarding these services please visit our website at <a href="https://www.qdsassociates.com">https://www.qdsassociates.com</a>.

#### FIGURE 3-1 KEY GDS CONSULTING AREAS



NATURAL GAS CONSULTING



RISK MANAGEMENT SERVICES



REGULATORY & RESTRUCTURING



GENERATION SERVICES



FINANCIAL ANALYSIS & RATE SERVICES



TRANSMISSION SERVICES



ELECTRIC PLANNING & DESIGN (Hi-Line Engineering)



WATER &
WASTEWATER
UTILITY
CONSULTING



NERC COMPLIANCE



MUNICIPAL FINANCIAL SERVICES



RIGHT OF WAY MANAGEMENT



POWER SUPPLY PLANNING



ENERGY EFFICIENCY & DEMAND SIDE MANAGEMENT



RTO SETTLEMENT & SCHEDULING SERVICES



DEREGULATION &
RETAIL PROCUREMENT



STATISTICS & MARKET RESEARCH



LOAD FORECASTING & DATA ANALYTICS



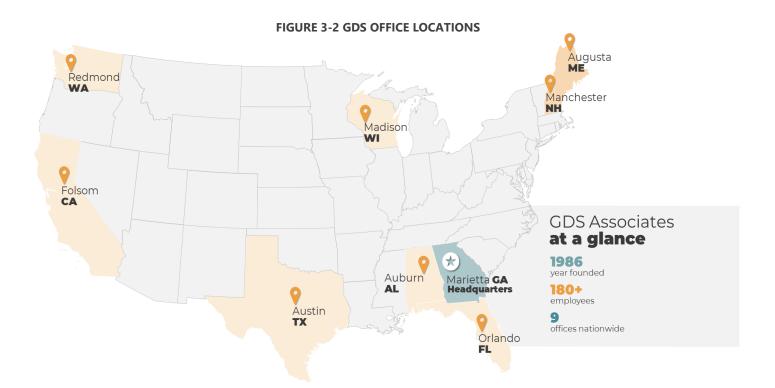
RENEWABLE ENERGY RESOURCES, DISTRIBUTED GENERATION, AND CHP



UTILITY PRIVATIZATION



INFORMATION TECHNOLOGY



#### 3.4 RELEVANT CLIENT SPECIFIC EXPERIENCE

Below is a summary of key projects related to the project's SOW that demonstrates GDS' capability and experience similar to the Commission's RFP.

<b>Project Name</b>	Monticello Life Extension Advanced Determination of Prudence			
Company Name North Dakota Public Service Commission, Case No. PU-23-182				
Contact Name	Adam Renfandt, CPA – Public Utility Analyst			
Phone	701.328.4153	Email <u>arenfandt@ND.gov</u>		

**Description**: GDS is assisting the North Dakota Public Service Commission staff with an evaluation of Northern States Power's request for Advance Determination of Prudence for an extension of the life of the Monticello Nuclear Plant. GDS will determine if the generation resource is needed to serve North Dakota customers, if it is the most economic generation resource, and the prudency of adding it to rate base. GDS efforts will also include providing testimony and support North Dakota PSC Staff efforts in the preparation of initial and reply brief development.

<b>Project Name</b>	Sherco 3 Solar Project Advanced Determination of Prudence			
<b>Company Name</b>	North Dakota Public Service Commission, Case No. PU-23-064			
Contact Name	Adam Renfandt, CPA –	Public Utility Analyst		
Phone	701.328.4153	Email <u>arenfandt@ND.gov</u>		

**Description**: GDS is assisting the North Dakota Public Service Commission staff with an evaluation of Northern States Power's request for Advance Determination of Prudence for the Sherco Solar 3 Project. GDS will determine if the generation resource is needed to serve North Dakota customers, if it is the most economic generation resource, and the prudency of adding it to rate base. GDS efforts will also include providing testimony and support North Dakota PSC Staff efforts in the preparation of initial and reply brief development.

<b>Project Name</b>	North Dakota Public Service Commission Case PU-15-096				
<b>Company Name</b>	North Dakota Public Service Commission				
Contact Name & Title	Michael R. Diller, Director				
Phone	701.328.4079	Email mdiller@nd.gov			
Project Description & W.	Project Description & Work Deliverables				

Project Description & Work Deliverables

GDS provided testimony in the Northern States Power Company's case in the matter of Advance Determination of Prudence for its 345 MW Power Purchase Agreement (PPA) with Mankato Energy Center. The testimony covered four main areas including review of NSP's Integrated Resource Plans (IRP), the need for additional generation resources, the cost impact on North Dakota customers of the PPA, and an assessment of capacity risks.

<b>Project Name</b>	North Dakota Public Service Commission Case PU-16-666			
<b>Company Name</b>	North Dakota Public Service Commission Advocacy Staff			
Contact Name & Title	Victor Schock, Public Utilities Analyst			
Phone	701.328.4079			
Project Description & Work Deliverables				

GDS provided testimony in the Montana-Dakota Utilities Co., A Division of MDU Resources Group, Inc. Electric Rate Increase Application. The testimony covered return on equity, cost analysis of Lewis & Clark RICE Project, disallowances, revenue requirement, cost of service and rate design.

<b>Project Name</b>	2021 Integrated Resource and Clean Energy Plan			
<b>Company Name</b>	City of Tallahassee (	Florida)		
Contact Name & Title	Contact Name & Title Michael Ohlsen, Clean Energy Plan Manager			
Phone	850.891.3128	Email michael.ohlsen@talgov.com		
THOTIC	650.651.5126	tillali michaellonisch@talgov.com		

Project Description & Work Deliverables

GDS is currently assisting the City of Tallahassee (City) with dual Integrated Resource and Clean Energy Plan as part of a multi-year project which also includes an extensive community stakeholder engagement plan. The City is working towards meeting a Clean Energy Resolution passed by its City Council in 2019 to achieve a 100% clean energy goal by 2050. GDS is supporting the City by identifying and evaluating supply-side and demand-side alternatives, conducting a holistic quantitative and qualitative analysis of multiple scenarios and portfolios for Tallahassee's consideration. Project components include consideration for the electric, natural gas, and water utilities as well as community-wide adoption to achieve both public and private achievement of the goal. (2020 to Present)

<b>Project Name</b>	Florida Power & Light Nuclear Plant Rate Review Costs			
<b>Company Name</b>	Florida Office of Public Council			
Contact Name & Title	Charles Rehwinkel, Attorney			
Phone	850.717.0328	Email	Rehwinkel.Charles@leg.state.fl.us	
Project Description & Work Deliverables				

GDS assisted the Florida Office of Public Council of the operating history of Turkey Point and St Lucie Nuclear Plants to determine if the utility was prudently maintaining the units. Provided testimony in regard to the cause of outages and why FPL should reimburse ratepayers for replacement power costs.

Project Name	Nuclear Plant Rate Imp	act		
Company Name	Georgia Public Service Co	mmission		
Contact Name & Title	Sheree Kernizan, Staff			
Phone	404.656.0994	Email	shereek@psc.state.ga.us	
Project Description & Work Deliverables				
CDC and ided Council Dublic Council Commission at the council of a color plant council and and				

GDS provided Georgia Public Service Commission staff support in review of nuclear plant operations and cost impacts on electric rates.

Project Name	Vermont Yanky Asset Transfer and Decommissioning			
Company Name	Vermont Public Utility Commission			
Contact Name & Title	Micah Howe, Staff Attorney			
Phone	802.828.1154	Email	Micah.Howe@vermont.gov	
Project Description & Work Deliverables				

GDS provided evaluation of transfer of Vermont Yankee Nuclear Plant assets and decommissioning fund and risk to ratepayers in association with Vermont Public Utility Commission proceeding Case No. 8880. This included review of the risk of the asset transfer, evaluation of decommissioning risk, and to ratepayers.

Project Name	Catawba Nuclear Plant Asset Allocation			
<b>Company Name</b>	Poyner Spruill Attorneys			
Contact Name & Title	Nick Ellis, Attorney			
Phone	252.972.7115	Email	jnellis@poynerspruill.com	
Project Description & Work Deliverables				

GDS successfully challenged the cost allocation of Catawba Nuclear Plant allocation to three minority public power agencies. This effort included review of Catawba costs, contractual requirements for cost allocation percentage of load assigned to each owner and how the plant was operated.

<b>Project Name</b>	2019 Load Forecast	East Texas	Electric Cooperative (Texas)	
Company Name	East Texas Electric Cooperative (Texas)			
Contact Name & Title	A.J. Goff, Interim General Manager			
Phone	936.560.9532	Email	ajg@gtpower.com	
Project Description & Work Deliverables				

GDS developed the Load Forecast for ETEC and each of its Member G&T and distribution cooperatives. Project included the development of statistically adjusted end-use models to project residential energy sales, econometric models to project commercial sales, and survey/judgment to project industrial energy sales. Developed the economic outlook relative to the respective service areas, developed the load and energy forecasts, and presented the forecasts to each respective cooperative's management team. The project also involves participating in various load forecast planning activities and correspondence between ETEC and its power suppliers. GDS has provided load forecasting services to ETEC since 1986.

#### 3.5 PROJECT TEAM

GDS has brought together a highly experienced and diverse project team to support the SOW for this project. Richard Polich will be the project lead and primary witness in this proceeding. Mr. Polich's regulatory expertise and integrated resource planning experience will be used to assess Entergy's justification for BPS and its cost. Megan Morello will be providing analytical analysis and research. Franchesca Winter's experience working with the Commission will provide regulatory support for the project. John Chiles will assess the opportunity for transmission/distribution options. Jack Madden, Senior Vice President will review testimony as part of GDS quality control. All consultants below are available to provide support on an "as needed" basis for the duration of the project.

**TABLE 3-1: GDS PROJECT TEAM** 

Team Personnel	Title	Task			
Rich Polich, P.E.	<b>Managing Director</b>	Project manager/Nuclear Expertise and State Subsidy Design			
Jack Madden, P.E.	Senior Vice President	Testimony review, Quality Control			
Francesca Winter	Managing Director	Rate Impact Analysis			
Megan Morello, P.E.	Project Manager	Analytical Analysis, Research, Engineering Expertise			
John Chiles	Principal	Transmission Modeling & Analysis Oversight			



**Richard Polich, PE, Managing Director** has more than 30 years' experience as an energy industry engineer, manager, and leader, combining his business and technical expertise in the management of governmental, industrial and utility projects. He has worked extensively in nuclear, coal, IGCC, natural gas, green/renewable generation. Mr. Polich has developed generation projects in wind, solar, and biomass in Australia, Canada, Caribbean, South American

and United States. His generation experience includes engineering of systems and providing engineering support of plant operations. He also has extensive experience in utility rates and regulation, having managed Consumers Energy's rates group for a number of years. In that function his responsibilities included load and revenue forecasting, overseeing the design of gas and electric rates and testifying in regulatory proceedings. Mr. Polich has testified in over thirty regulatory and legislative proceedings at both the state and federal level.



**Jack Madden, P.E., Senior Vice-President** for GDS, has over 35 years of experience in the area of cooperative and municipal electric utility power supply planning, analysis and contracting. He has been responsible for production cost simulation, performing economic analyses of long- and short-range power supply alternatives, operations budgeting, utility financing, financial forecasting, and fuel supply analyses. Mr. Madden was instrumental in the filing of an initial rate

at the FERC by a G&T electric cooperative and has also provided support for wholesale rate filings at the Texas

Public Utilities Commission. He has provided testimony on power supply and rate matters and an investigation into the readiness of the markets for retail competition before the Texas Public Utility Commission and has provided testimony on wholesale power supply and rate matters before the FERC. Mr. Madden has directed many requests for proposals ("RFPs") for capacity and energy purchases, renewable energy resources, conventional generation resources, and storage resources. Mr. Madden is heavily involved in RTO market design and stakeholder processes. Mr. Madden holds an MBA from Georgia State University and a BS degree in Industrial Engineering from the Georgia Institute of Technology.



**Francesca Winter, Managing Director** of GDS has over 13 years of experience in the electric utility industry, both working as a consultant for electric cooperatives, municipalities, and investor-owned utilities and as the Director of Regulatory Strategy at an investor-owned utility. Ms. Winter has extensive knowledge and vast experience with retail COS, ratemaking and regulatory principles, practices, concepts, and theories. She has worked with electric

cooperatives to develop financial forecasts, design rates to appropriately recover costs, and helped implement new rate design concepts including TOU rates, seasonal rates, and smoothly transition to demand rates. She also has significant experience with wholesale utility rates and transmission COS and rate design. Francesca has prepared electric utility rate filings and been an expert witness in regulatory proceedings in Arkansas, Texas, and Louisiana. Ms. Winter has a BS degree in Electrical Engineering from Oklahoma State University and an MBA from Oklahoma Christian University.



**Megan Morello, P.E., Project Manager** has over 6 years of experience as an energy industry engineer and consultant, providing technical expertise in the management of industrial and utility projects. She has worked extensively with coal, natural gas, and renewable generation. Ms. Morello advises electric cooperative and municipal clientele on power generation asset management and procurement of new power resources. She provides research, analysis, and engineering support of power plant operations, integrated resource planning, procurement

planning, RFP processes and evaluation, preparation of annual operating budgets, economic feasibility evaluations of generating resources, analyses of plant ownership opportunities, environmental allowance monitoring, resource adequacy planning and analysis, and regular market participation analysis. She evaluates and monitors operations data for various electric utility assets and provides analyses of plant performance to clients.

Ms. Morello has also worked with state regulatory offices to provide litigation support for utility rate cases, including assessments of power plant outages, utility industry best practices for operation and maintenance, and coal ash management as it pertains to state and federal regulatory requirements. Her experience also includes providing consulting services regarding natural gas usage and procurement, performing energy studies related to energy utility infrastructure, and performing solar and battery storage feasibility studies.



John Chiles, Principal has over 35 years of electric utility and consulting experience in transmission system planning and policy, open access issues, interconnection and deliverability analysis, energy trading and transaction scheduling, balancing authority operations and energy market design. He has worked in several sectors of the energy industry, including electric cooperatives, municipal joint action agencies, investor-owned utilities, and merchant energy/IPP companies. Prior to coming to GDS, he was responsible for managing the daily

transmission portfolio for the two largest merchant power plants in the United States and coordinating a generator-only control area in the WECC region. He provides strategic advice to clients as a stakeholder representative at various Regional Transmission Organizations and serves as an expert witness before state commissions and the FERC on RTO transmission and market issues, integrated resource planning, transmission expansion plan evaluation, transmission facility need determination and transmission open access for load and generation customers. Mr. Chiles holds a BS Degree in Engineering from the University of South Florida.

# **4** Project Cost

GDS has estimated the cost for completing the SOW in response to the Louisiana Public Service Commission's RFP 24.02. The proposed costs reflect the maximum amount for GDS to complete this project based on the SOW contained in this proposal. GDS will commit to performing the SOW contained in this proposal for a not to exceed cost of \$116,300.

Table 4-1 - GDS Associates Cost Proposal Louisiana Public Service Commission RFP 24.02

		Richard	Megan	Jack	Francesca	John	Total Labor	Labor Total
	TASK DESCRIPTION	Polich	Morello	Madden	Winter	Chiles	Hours	Cost
1	Entergy Application Review and Assessment	15	8		8	5	36	\$10,240
2	Discovery	12	18		11	5	46	\$12,980
3	Testimony Preparation	72	12	12	9	5	110	\$35,500
4	Hearing Participation and Brief Support	34	12		9		55	\$18,140
5	Post-Certification Monitoring	47	53	4	4		108	\$33,920
	Total Consultant Hours:	180	103	16	41	15	355	
	CONSULTANT COSTS							
	Hourly Rate:	\$340	\$280	\$370	\$320	\$340		
	Total Hourly CostsCosts:	\$61,200	\$28,840	\$5,920	\$13,120	\$5,100		\$114,180

EXPENSE	Quan	tity		Cost	
Airfare	1	Trips	\$1,400	per trip	\$1,400
Lodging	2	Days	\$165	per day	\$330
Rental Car	2	Days	\$120	per day	\$240
Meals	2	Days	\$60	per day	\$120
Total Expenses					\$2,090
TOTAL PROJECTED COSTS					\$116,270

Please note that Task 5 - post-certification Monitoring, represents \$33,920 of the total project cost. GDS will commit to performing the regulatory portion of this project for a not to exceed cost of \$82,350. All costs will be billed on a time and materials basis using the billing rates contained in Appendix B.

## **APPENDIX A. Resumes**











#### EDUCATION

Master of Business Administration,

#### PROFESSIONAL AFFILIATIONS/ CERTIFICATIONS

#### EXPERTISE

## RICHARD POLICH

MANAGING DIRECTOR, P.E.

# GDS Associates. Inc.

PROFILE

Mr. Polich has more than 30 years' experience as an energy industry engineer, manager, and leader, combining his business and technical expertise in the management of governmental, industrial and utility projects. He has worked extensively in nuclear, coal, IGCC, natural gas, green/renewable generation. Mr. Polich has developed generation projects in wind, solar, and biomass in Australia, Canada, Caribbean, South American and United States. His generation experience includes engineering of systems and providing engineering support of plant operations. Notable projects include the Midland Nuclear Project and its conversion to natural gas combined cycle, start-up testing support for Consumers' coal-fired Campbell 3, Palisades nuclear steam generator replacement support, Covert Generating Station feasibility evaluation, and a Lake Erie offshore wind project. He also has extensive experience in utility rates and regulation, having managed Consumers Energy's rates group for a number of years. In that function his responsibilities included load and revenue forecasting, overseeing the design of gas and electric rates and testifying in regulatory proceedings. Mr. Polich has testified in over thirty regulatory and legislative proceedings.

Mr. Polich has testified in over 30 regulatory proceedings on a variety of issues. Recently, Mr. Polich provided direct and rebuttal testimony before the Hawaii Public Utilities Commission in Docket No. 2015-0022, regarding the Hawaiian Electric Company, Inc. and NextEra Merger. Over 15 years' experience working with Michigan Public Service Commission on renewable energy policies, independent power supplier regulations, and electric rate cases. He has also worked with the Michigan Legislature: defined laws for open markets, renewable portfolio standards. Mr. Polich has worked on various projects and policies in Arizona, Arkansas, California, Georgia, Indiana, Minnesota Nebraska, New Mexico, Ohio, Texas, and Wisconsin Commissions over the last ten years. Mr. Polich also established Consumers Energy's Federal Energy Regulatory Commission transmission tariffs.

#### PROFESSIONAL PROJECT EXPERIENCE

#### RATES AND REGULATORY EXPERIENCE

GDS Associates, Inc., Managing Director

Florida Public Utility Commission – Docket No. 219001-E1, Duke Energy Florida Power Cost Recovery Clause Provided testimony on the why the steam turbine failure at Duke Energy Florida's Bartow Combined Cycle Plant was the result of excess steam flow resulting in turbine blade failure and quantified the cost impact of replacement power on customers. Administrative law judge ruled Duke Energy Florida should refund over \$1 million in power costs to customers.

Federal Energy Regulatory Commission - Docket No. ER17-1821-002, Panda Generation Reactive Power Revenue Requirement Provided testimony on allocation of costs in opposition to Panda's reactive power revenue requirement request. Administrative Law Judge agreed with GDS allocation of costs, FERC yet to issue decision.

Indiana Utility Regulatory Commission - Cause No. 38707-FAC111-S1, Duke Energy Indiana Fuel Clause Adjustment Charge Proceeding Provided testimony on why the cause of Duke Energy Indiana's Cayuga 1 outage was the result of negligence and should result in disallowance of fuel cost recovery. Resulted in disallowance of over \$3 million.







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## RICHARD POLICH

MANAGING DIRECTOR, P.E.

#### PROFESSIONAL PROJECT EXPERIENCE [continued]

#### **NUCLEAR PROJECT EXPERIENCE**

Vermont Yankee. Provided the Vermont Public Utility Commission advisory services on the asset transfer of Vermont Yankee from Entergy Nuclear Operations, Inc. to NorthStar Group Holdings, LLC. This effort has included assessment of financial strength of new company, adequacy of Nuclear Decommissioning Trust Fund to fund decommissioning efforts, evaluation of decommissioning methodology and State of Vermont Risk.

Vogtle Nuclear Plant Units 3 & 4. Mr. Polich has provided advisory services to the team performing the oversight of the construction of the Vogel Plant Units 3 & 4 as part of GDS project oversight responsibilities for the Georgia Public Service Commission.

St. Lucie Nuclear Plant. Provided a risk assessment, decommissioning funding study and ownership evaluation for City of Vero Beach. This included review of project maintenance history, steam generator replacement project, analysis of decommissioning needs and funding and assessing current value of Vero Beach's ownership share. Grand Gulf Nuclear Project. Assessed the adequacy of decommissioning funding and funding level for the grand Gulf Nuclear plant for Cooperative Energy. Project purpose was to assess changes in decommissioning funding rates and to determine if sufficient funds would be available for plant decommissioning.

Consumers Energy Midland Nuclear Plant. Responsible for overseeing EPC contractor design and construction of primary and secondary nuclear systems. Included review of systems for compliance with Nuclear Regulatory Commission regulations. Key projects included:

- Leading team to analyze plant and determine best methods for compliance with new CFR Appendix R Fire Protection rules
- Design of primary cooling system pump oil collection and disposal systems.
- Oversight of redesign of component cooling water systems.
- Analysis of diesel generator capability to meet emergency shutdown power requirements.
- Primary interface with Dow Chemical for steam supply contract.

Ohio Edison Company Erie Nuclear Project. Design engineer responsible for the design, equipment specifications, bid evaluations and regulatory licensing for nuclear steam supply system and ancillary systems. Key projects included:

- Project Thermal Analysis
- Development of NSS valve specifications
- Major equipment bid Proposal Evaluation and recommendations
- Interface with Babcock & Wilcox on NSSS Design

#### NATURAL GAS COMBINED CYCLE EXPERIENCE

Consumers Energy. 1,560 MW Midland Cogeneration Venture. Member of a small team selected to investigate the feasibility of converting the mothballed Midland Nuclear Plant into a fossil fueled power plant.







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## RICHARD POLICH

MANAGING DIRECTOR, P.E.

#### PROFESSIONAL PROJECT EXPERIENCE [continued]

Established new plant configuration that repowered the existing nuclear steam turbine with natural gas fired combustion turbines and heat recovery steam generators. Developed the new thermal cycle and heat rate, determined how to supply steam to Dow chemical for cogeneration, developed models for projecting plant performance, defined which portions of the nuclear plant were useful in the new combined cycle plant and forecasted project economics.

#### Nordic Energy - Vice President

- Project Manager for the development of two 1,150 MW IGCC projects proposed to Georgia Power and Xcel Energy in response to RFPs. Responsibilities included establishing thermal cycles, equipment selection, site selection, supervising engineering, developing project proforma and proposals.
- Project Manager for 230 MW power barge to be located on the Columbia River near Portland Oregon. Lead the project development team responsible for securing equipment, designing the power plant, design of barges, assessing site feasibility, developing project economics and interconnection applications.

#### RENEWABLE ENERGY EXPERIENCE

Matinee Energy Utility Scale Solar Developer. Engineering design and project development consultant for utility scale solar photovoltaic projects. Development activities include site selection, equipment specifications, financial analysis and preparation of proposals. Also responsible for engineering and securing electrical interconnection.

Windlab Developments USA Wind Power Developer. Responsible for greenfield development of the US platform for wind energy projects east of the Mississippi. Developed the company's engineering protocol for wind project design and construction, responsible for managing engineering design and construction of projects, and established six wind power projects (750 MW). Responsible for negation of Power Purchase Agreements, electrical interconnection studies, interface with Midwest ISO and submitting Generation Interconnection Application.

Tradewind Energy Wind Power Project Developer. Project developer for 800 MW of wind power projects in Michigan and Indiana. Introduced new project management methods to the development process which resulted in savings of over \$200,000 annually on each project.

Third Planet Windpower Wind Power Project Developer. Engineering and project management consultant to support the startup of new wind power company. Established engineering standards used for selection of wind project equipment and project construction, analysis tools for evaluating projecting wind project power production, and performed project economic modeling.

Nordic Environmental Power Wind Power Project Developer. Electric transmission system consultant on the development of several wind power projects. Supported Noble's decisions on transmission gird interconnect and negotiate interconnection agreements.

#### **ENERGY EFFICIENCY EXPERIENCE**

Arkansas Energy Office Weatherization Assistance Program Evaluation. Evaluated the performance and operations of Arkansas's Weatherization Assistance Program. This included review of program effectiveness, program operations, energy efficiencies attained, adequacy of energy efficiency measures and subcontractor performance.

CLEAResult Arkansas Energy Efficiency Programs. Energy efficiency operations and program support for 400% increase in Arkansas energy efficiency programs. Developed processes for data collection, field staff deployment and job assignments.







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# RICHARD POLICH

MANAGING DIRECTOR, P.E.

#### PROFESSIONAL PROJECT EXPERIENCE [continued]

#### **ECONOMIC IMPACT ASSESSMENT**

Michigan Department of Environmental Quality Economic Impacts of a Renewable Portfolio Standard and Energy Efficiency Program for Michigan. Project Manager for this report which focused on the economic impact of renewable portfolio standard and energy efficiency programs on the State of Michigan. The evaluation sued in this report encompassed using integrated resource planning models, econometric modeling and electric pricing models for the entire State of Michigan.

West Michigan Business Alliance Alternative and Renewable Energy Cluster Analysis. Prepared the report provided a road map for Western Michigan businesses to establish new business in the renewable energy industry.

#### POWER PROJECT EXPERIENCE

Detroit Edison St Clair Power Station. Performed coal combustion analysis associated with conversion Powder River Basin coal. Work included pulverizer mill performance testing, boiler combustion analysis on new coal, and unit performance analysis.

Consumers Energy Campbell 3. Supported start-up efforts of this 800 MW pulverized coal power plant. Part of team that performed analysis of boiler data and determined the cause of superheater failure. Also part of team to analyze performance test data for warranty evaluation.

Consumers Energy Weadock Plant. Design oversight and specified various plant upgrades during major maintenance outage. Included replacement of high-pressure superheater, design of new steam supply pipes, valve specifications and supported plant restart.

#### PAPERS & PUBLICATIONS

- Engineering and Economic Evaluation of Offshore Wind Plant Performance and Cost Data, 2011, Produced for the Electric Power Research Institute, KEMA, Inc.
- FERC's 15% Fast Track Screening Criterion, 2012, Paper reviewing the FERC 15% screening criteria for electrical interconnection, KEMA, Inc.
- Island of Saint Maarten Sustainable Energy Study, 2012, Produced for the Cabinet of Ministry VROMI, KEMA Inc.
- A Study of Economic Impacts from the Implementation of a Renewable Portfolio Standard and an Energy Efficiency Program in Michigan, 2007, Produced for the Michigan Department of Environmental Quality
- Alternative and Renewable Energy Cluster Analysis, 2007, Produced for the West Michigan Strategic Alliance and The Right Place

#### COURSES & SEMINARS

- Association of Energy Engineers
- Certified Energy Manager Green Building Council
- Associated LEED Certification Training CLEAResult Leadership Academy



#### PREVIOUS TESTIMONY OF RICHARD A. POLICH

<b>COMMISSION</b>	CASE	ON BEHALF	TITLE
Michigan	U-21090	Biomass Plants	Request for Approval of Consumers Energy Integrated Resource Plan
Minnesota	E999/AA-20-171	Minnesota Department	Independent investigation of the unplanned outages at Minnesota Power's
		of Commerce Division	Clay Boswell coal power plant during the period of July 1, 2018 to December
		of Energy Resources	21, 2019
FERC	ER-21-864	Meyersdale Storage	Schedule 2, Reactive Supply and Voltage Control from Generation Sources
			Service
Florida	2019140-EI	Florida Office of	Crystal River 3 Accelerated Decommissioning
		Public Council	
Florida	2019001-EI	Florida Office of	Fuel Adjustment Clause – Bartow Steam Turbine Failure Power Supply Cost
		Public Council	Recovery Disallowance
FERC	ER17-1821-002	Joint Customers	Revenue Requirement for Reactive Power Production Capability
			of the Panda Stonewall Generating Facility
North Carolina	E-2 Sub1142	Duke Energy Progress	Duke Energy Progress General Rate Case
Indiana	38707 FAC111-S1		Duke Energy Indiana, LLC for Fuel Cost Adjustment Clause
North Dakota	PU-16-166	ND PSC Staff	Montana-Dakota Utilities 2016 Electric Rate Increase Application
Hawaii	2015-0022	Sun Edison	Regarding the Hawaiian Electric Company, Inc. and NextEra Merger
North Dakota	PU-15-96	ND PSC Staff	Northern States Power Determination of Prudence
Michigan	U-10143	Consumers Energy	Consumers Energy Approval of an Experimental Retail Wheeling Case
Michigan	U-10335	Consumers Energy	General Rate Case
Michigan	U-10625	Consumers Energy	Proposal for Market-Based Rates Under Rate-K
Michigan	U-10685	Consumers Energy	1996 General Rate Case
Michigan	U-11915	Energy Michigan	Supplier Licensing
Michigan	U-11955	Energy Michigan	Consumers Energy Stranded & Implementation Cost Recovery
Michigan	U-11956	Energy Michigan	Detroit Edison Stranded & Implementation Cost Recovery
Michigan	U-12478	Energy Michigan	Detroit Edison Asset Securitization Case
Michigan	U-12488	Energy Michigan	Consumers Energy Retail Open Access Tariff
Michigan	U-12489	Energy Michigan	Detroit Edison Retail Open Access Tariffs
Michigan	U-12505	Energy Michigan	Consumers Energy Asset Securitization Cases
Michigan	U-12639	Energy Michigan	Stranded Cost Methodology Case
Michigan	U-13380	Energy Michigan	Consumers Energy 2000, 2001 & 2002 Stranded Cost Case
Michigan	U-13350	Energy Michigan	Detroit Edison 2000 & 2001 Stranded Cost Case
Michigan	U-13715	Energy Michigan	Consumers Energy Securitization of Qualified Costs
Michigan	U-13720	Energy Michigan	Consumers Energy 2002 Stranded Costs
Michigan	U-13808	Energy Michigan	Detroit Edison General Rate Case
Michigan	U-13808-R	Energy Michigan	Detroit Edison 2004 Stranded Cost &
Michigan	U-14474	Energy Michigan	Detroit Edison 2004 PSCR Reconciliation Case

#### PREVIOUS TESTIMONY OF RICHARD A. POLICH

<b>COMMISSIO</b>	ON CASE	ON BEHALF	TITLE
Michigan	U-13933	Energy Michigan	Detroit Edison Low-Income Energy Assistance Credit for Residential Electric
			Customers
Michigan	U-13917-R	Energy Michigan	Consumers Energy 2004 PSCR Reconciliation Case
Michigan	U-13989	Energy Michigan	Consumers Energy Request for Special Contract Approval
Michigan	U-14098	Energy Michigan	Consumers Energy 2003 Stranded Costs
Michigan	U-14148	Energy Michigan	Consumers Energy MCL 460.10d(4) Case
Michigan	U-14347	Energy Michigan	Consumers Energy General Rate Case
Michigan	U-14274-R	Energy Michigan	Consumers Energy 2005 PSCR Reconciliation Case
Michigan	U-14275-R	Energy Michigan	Detroit Edison Company 2005 PSCR Reconciliation Case
Michigan	U-14399	Energy Michigan	Detroit Edison Company Application for Unbundling of Rate
Michigan	U-14992	Energy Michigan	Power Purchase Agreement and for Other Relief in Connection with the sale of
			the Palisades Nuclear Power Plant and Other Assets





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#### EDUCATION

Master of Business Administration, Georgia State University, 1985

Bachelor of Industrial Engineering, Georgia Institute of Technology, 1984

#### PROFESSIONAL AFFILIATIONS/ CERTIFICATIONS

Registered Professional Engineer (PE) in the State of Georgia

Institute of Industrial Engineers

Beta Gamma Sigma Honor Society

National Society of Professional Engineers

#### EXPERTISE

Power Supply Planning, Analyses 8 Contracting

**Production Cost Simulation** 

Economic Analyses of Long- and Short-Range Power Supply Alternatives

Operations Budgeting

Utility Financing

Financial Forecasting

Fuel Supply Analyses

## JACK MADDEN



SENIOR VICE PRESIDENT & TREASURER, P.E.

#### PROFILE

Mr. Madden has over 35 years of experience in the areas of cooperative and municipal electric utility power supply planning, analysis and contracting. He has been responsible for production cost simulation, performing economic analyses of long- and short-range power supply alternatives, operations budgeting, utility financing, financial forecasting, and fuel supply analyses. Mr. Madden was instrumental in the filing of an initial rate at the FERC by a G&T electric cooperative and has also provided support for wholesale rate filings at the Texas Public Utilities Commission. Mr. Madden has provided testimony on power supply and rate matters and an investigation into the readiness of the markets for retail competition before the Texas Public Utility Commission and has provided testimony on wholesale power supply and rate matters before the FERC.

Recently, Mr. Madden has been responsible for the preparation and issuance of many requests for proposals ("RFPs") as well as the evaluation of responses, contract negotiations with the successful respondents, and the acquisition of transmission and ancillary services agreements required to implement the new arrangements. These arrangements have included full and partial requirements purchases, unit power purchases, capacity and energy block purchases in organized markets, purchase of an ownership share in existing coal and gas-fired generation and the construction of new gas-fired combined-cycle generation. In the last few years, Mr. Madden has managed RFPs specifically seeking wind and solar energy resources in several locations in the U.S. and negotiated the resulting contracts.

Mr. Madden has also been involved in the development, contracting, and operation of several power plants, including natural gas-fired peaking and combined-cycle, coal-fired, hydroelectric, wind, and solar generation. In his role at GDS, Mr. Madden directs the provision of generation-related services to clients around the country.

#### PROJECT EXPERIENCE

East Texas Electric Cooperative, Inc., Nacogdoches, Texas. Mr. Madden has been responsible for the evaluation of responses to several of ETEC's RFPs for base load, intermediate and peaking power supply resources, as well as partial requirements services. He has also been involved in the feasibility evaluation of new hydroelectric projects for possible development. Mr. Madden has been involved in the development of a comprehensive strategic plan for ETEC, including the possible purchase or construction of power supply resources for its member distribution cooperatives and the construction of a cooperatively-owned transmission system. He has been instrumental in negotiation of contracts for the purchase and/or construction of combined-cycle, peaking and base load resources. Mr. Madden was also largely responsible for the development of a pooled rate for ETEC and the filing of ETEC's initial rate at the FERC. In 2014, Mr. Madden managed an RFP for wind resources, resulting in purchase power agreements ("PPA") from wind resources located in Oklahoma. Mr. Madden is currently responsible for parts of the power supply planning efforts of ETEC, which includes load in Entergy/MISO, SWEPCO/SPP and ERCOT. Mr. Madden continues to assist ETEC on an ongoing extensive basis.

Northeast Texas Electric Cooperative, Longview, Texas. Mr. Madden has been responsible for the evaluation of responses to several of NTEC's RFPs for intermediate and peaking power supply resources, as well as partial requirements services. Mr. Madden has been responsible for helping NTEC manage its relationship with SWEPCO, its long-term partial requirements supplier.





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## JACK MADDEN

SENIOR VICE PRESIDENT & TREASURER, P.E. PROJECT EXPERIENCE [continued]

Mr. Madden has been involved in the development of a comprehensive strategic plan for NTEC, including the possible purchase or construction of power supply resources for its member cooperatives and the construction of a cooperatively-owned transmission system. He has been instrumental in negotiation of contracts for the development, construction, and operation of a 550 MW natural gas-fired combined-cycle plant.

Mr. Madden issued a solicitation seeking 150 MW of power. The RFP resulted in the client participating in joint-development of a natural gas-fired combined-cycle generating unit located in Texas. Mr. Madden was extensively involved with all aspects of this joint development including negotiating all the project documents between the owners, negotiating the Engineering, Procurement, and Construction contract, securing transmission and gas pipeline interconnection, securing water supply for the project, the O&M Agreement, LTSA, and securing financing from the federal government. In 2014, Mr. Madden managed an RFP for wind resources, resulting in purchase power agreements ("PPA") from wind resources located in Oklahoma. Mr. Madden continues to assist NTEC on an ongoing basis.

Central Virginia Electric Cooperative, Arrington, Virginia. Mr. Madden has been responsible for the power supply planning and contracting efforts of CVEC, an independent electric distribution cooperative. Mr. Madden has led efforts by CVEC to build a diversified electric resource portfolio as the cooperative came out from under a long-term requirements contract. These efforts have included joint participation in a gasfired combined-cycle project, wind energy from a resource located in Ohio, hydroelectric purchases from the Southeastern Power Administration, market-based block purchases of various quantity, term, and shape (5x16, 7x24, etc.). In addition, Mr. Madden led CVEC's efforts in the development of two behind-the-meter solar generation facilities to round out CVEC's portfolio, as well as help it meet the Virginia voluntary renewable portfolio targets in an economic manner. Mr. Madden continues to assist CVEC on an ongoing basis.

Blue Ridge Power Agency, Danville, Virginia. Mr. Madden has been responsible for the power supply planning and contracting efforts of BRPA, a joint-action agency comprised of municipal utilities, a state university and a distribution cooperative. This has included contracting for deregulated power supply, resulting in over \$100 million of savings over seven years, negotiation of replacement contracts and, more recently, negotiation of contracts whereby some members purchase power from an investor-owned utility under long term formula rate contracts and others joined AMP, a municipal joint action agency. For the AMP members, Mr. Madden has assisted BRPA in evaluating resources proposed by AMP, including a coal-fired resource, peaking generation, a combined-cycle unit, hydroelectric projects, as well several market purchases both through and independent of AMP. Mr. Madden was also instrumental in the negotiation of BRPA's transmission and ancillary services agreements. Mr. Madden continues to assist BRPA on a regular basis.

Sam Rayburn G&T Electric Cooperative, Inc., Nacogdoches, Texas. Mr. Madden prepared studies on the feasibility of purchasing off-system power and reserves from Entergy Services, Inc. Mr. Madden also assisted in the development and implementation of a resource scheduling system, and in the development of a new power supply arrangement with Gulf States Utilities, now Entergy. He has also been involved in budgeting and long-range financial forecasting. SRG&T merged with ETEC in 2018





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## JACK MADDEN

SENIOR VICE PRESIDENT & TREASURER, P.E.

PROJECT EXPERIENCE [continued]

Indiana-Michigan Municipal Distributors Association. Mr. Madden has assisted the members of IMMDA in their power supply procurement efforts for several years. This included the issuance of an RFP resulting in a restructured arrangement with their incumbent power supplier, Indiana-Michigan Power ("I&M"). Recently, Mr. Madden has let efforts whereby IMMDA members gave notice to terminate their I&M contract and purchased supplies from other providers; these arrangements have saved the IMMDA members substantial amounts of money. More recently, Mr. Madden has helped most of the Michigan IMMDA members join MPPA and the Indiana IMMDA members purchase power from Wolverine.

Sam Rayburn Municipal Power Agency, Livingston, Texas. Mr. Madden has assisted in the preparation of an Engineer's Report which was used in the Agency's refinancing of approximately \$243 Million of long-term debt. Mr. Madden has been responsible for preparing the annual operating budgets for the Agency and assisting in the development of rates to members. He also has assisted in the preparation of the annual Comprehensive Engineering Report as required by the Agency's bond Indenture. Other power supply work Mr. Madden has performed for the Agency includes analyses of off-system purchases, the estimation and true-up of entitlement assignment payments and the feasibility of hydro project development. Mr. Madden has also assisted the Agency in its efforts to market excess capacity and energy.

Bristol Virginia Utilities, Bristol, Virginia. Mr. Madden completed the negotiation of terms and conditions for a Power Sales Agreement between BVU and Cinergy Services, Inc. (135 MW total). The supply from Cinergy was selected in a competitive bidding process, which was managed by Mr. Madden. The power cost savings from the new arrangement approached \$70 million. Mr. Madden was also involved on behalf of BVU in Cinergy's filing for transmission service under Section 211 of the Federal Power Act and in negotiating settlement terms relating to a FERC stranded cost filing made by TVA against BVUB. TVA eventually withdrew the complaint. Mr. Madden also assisted BVU's move to the transmission system of AEP and eventual return to TVA.

The City of Radford, Virginia. Mr. Madden issued a solicitation seeking up to 75 MW of power. This project included development of the RFP, evaluating the proposals received, selecting the winning respondent(s), negotiating the resulting contracts, and assisting in the implementation of the chosen arrangement. The savings from the resulting contract with AEP Services, Inc. was expected to be more than of \$30 million. Mr. Madden was responsible for the development of a solicitation to replace AEP current contract at its expiration in June 2006, resulting in Radford entering a long-term formula rate contract with an investor-owned utility. Mr. Madden continues to assist with the power supply planning efforts of Radford.

The City of Dowagiac, Michigan. Mr. Madden issued a solicitation seeking up to 20 MW of power, purchased from ComEd. This project included development of the RFP, evaluating the proposals received, selecting the winning respondent(s), negotiating the resulting contracts, negotiating the transmission contracts necessary, as well as arranging for dynamic scheduling of the load from a remote-control area, and assisting in the implementation of the chosen arrangement. These arrangements resulted in significant savings. More recently, Mr. Madden has assisted Dowagiac in purchases under formula rates from I&M.









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Marietta GA 30067

#### EDUCATION

Master of Business Administration,

#### EXPERTISE

Retail Rates Analyses & Design

# **FRANCESCA** WINTER

MANAGING DIRECTOR



#### PROFESSIONAL EXPERIENCE

GDS Associates, Inc., Managing Director, Marietta, GA, Oct 2023,

- Provides leadership of department staff on technical and corporate matters.
- Provides project management of cost of service and rate study projects as well as for other departmental services, including responsibility for client communications and overall project quality.
- Conducts cost of service, rate development, and financial analysis to meet client objectives.
- Maintains expert knowledge on cost of service, rate, and financial matters.
- Maintains present and build new client relationships.
- Develops proposals for new projects in response to Requests for Proposals
- Participates in business planning, including evaluation of potential new services, marketing plans, financial projections, staffing, and coordination with corporate objectives.

Cleco Power, Director - Regulatory Strategy, Pineville, LA,

- Significantly Contributes to the Development, Implementation, and Execution of the Company's Regulatory Strategy
  - Leads and Organizes Settlement Discussions with the Louisiana Public Service Commission and Intervenors
  - Interact and Present Regulatory Data and Information to the Executive Team and The Board
- Coordinates the Development and Implementation of Corporate Regulatory Pricing and Related Strategies to Optimize Earnings Capability and Revenue Growth
- Develops a Wider Understanding of Regulatory Accounting and Ratemaking Concepts Throughout the Company
- Develops, Manages, and Coordinates the Strategy Around All Aspects of Filed Regulatory Dockets
  - Ensures the Accurate Preparation and Timely Filing of Rate Cases and Other Regulatory Dockets Including Plant Retirements, Securitization and Cost Recovery
  - Directs the Development of Revenue Requirements, Cost of Service, Load Research, Revenue Allocation, and Rate Design and All Aspects of Rate Case Analytics
  - Develops, Manages and Coordinates Rate Case Strategy, Testimony Development, and Interrogatory Response Development
- Develops and Manages Rates and Regulatory Skills and Capabilities to Successfully Achieve Corporate Strategic Goals
- Responsible for Leading Project Teams to Achieve Their Function's Targets through Highly Complex Objectives, Milestones, Obstacles and Priorities while Focusing Delivering on 3-5 year plans aligned with the Company's Vision

Burns & McDonnell / 1898 & Co., Project Manager, Kansas City, MO,

- Project Manager for Retail, Transmission and Wholesale Electric Utility Cost of Service and Rate Design Projects
  - Prepared and provided Utility Rate Filings and Expert Witness Testimony
  - Lead All Aspects of Project Execution including Scope, Schedule, and Budget
  - Ensured Quality Control of Deliverables
  - Analyzed and Communicated Project Status, Risks, Schedule, and Costs to Internal / External Stakeholders
  - Lead Multi-Discipline Teams of Engineers and Analysts
  - Planned, Organized, and Communicated Project Personnel Needs to Department Management



# FRANCESCA WINTER

MANAGING DIRECTOR

#### ${\tt CONTACT}$



Francesca.winter@gdsassociates.com

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Marietta GA 30067

#### PROFESSIONAL EXPERIENCE [continued]

- Responsible for, and Managed All Aspects of Business Development
  - Developed New, and Managed Existing, Client Relationships through Client Marketing & Project Interactions
  - Identified New Sales Opportunities with Clients
  - Lead Proposal Development and Submission Including Project Planning, Budgeting and Scheduling
  - Established Critical Project Objectives and Performances with Clients
  - Lead Contract Preparation and Negotiations
- Developed Wireless Broadband Private LTE Network Total Cost of Ownership Analyses and Cost-Benefit Models

#### C.H. Guernsey, Senior Consultant, Oklahoma City, OK

- Specialized in the Development of Financial Forecasts, Revenue Requirements, Cost of Service, Rate Design and Analysis for Retail and Wholesale Electric Utility Systems with a focus on Electric Cooperatives
- Developed Electric Transmission System Revenue Requirements, Transmission Cost of Service, and Transmission Rates
- Prepared Electric Utility Rate Filings and Presented Expert Witness Testimony in Regulated Environments
- Assisted in Business Development Efforts to Maintain Existing Clients and Develop New Clients

#### RedSky Land, LLC, Lease Records Analyst, Edmond, OK

- Prepared New Leases & Reviewed Lease Documentation
- Organized and Maintained the Land System and Lease Records
- Analyzed and Interpreted Title Documents to Establish Ownership for Mineral Properties

#### T/J Inspection, Inc., Engineer / Project Manager, Edmond, OK

- Provided Financial Analyses of the Natural Gas Industry
- Developed Training Materials for Pipeline Inspectors
- Developed and Maintained a Database for Tracking Field Employees' Operator Qualifications Training

#### OGE Energy (Enogex), Oklahoma City, OK,

**Senior Strategy Analyst** (05/2008 – 03/2009)

- Conducted Internal, Macro-Environment, Micro-Environment Assessments
- Led Strengths, Weaknesses, Opportunities and Threats Analyses
- Supported On-Going Business Intelligence, Competitive Tracking, and Best Practice Efforts

#### Senior Standards Design Engineer (05/2007 – 05/2008)

- Developed Specifications for Purchase of Compressor Units
- Updated and Modified Existing Engineering Standards
- Team Lead for Developing a Standardized Compressor Station Design

#### **Quantitative Analyst** (10/2005 – 05/2007)

- Utilized Mathematical Models to Value Financial and Real Options
- Assisted in Segregation and Valuation of Risk Components of All Types of Deals
- Provided Statistic Analyses and Reports in Support of Commercial Operations



# FRANCESCA WINTER

MANAGING DIRECTOR

#### ${\tt CONTACT}$



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#### PROFESSIONAL EXPERIENCE [continued]

#### **Compression Engineer** (11/2004 – 10/2005)

- Provided Engineering Support for all Compression Operations
- Developed Best Practice Operations, Maintenance and Repair Procedures and Standards
- Project Managed Compressor Repackages

#### Senior System Planner (10/2002 - 11/2004)

- Implemented Procedures for Use of SAP Plant Maintenance System
- Trained 500+ Employees to Use SAP Plant Maintenance System
- Developed Training Materials & Implementation Plan for SAP Plant Maintenance System

#### Measurement Engineer Intern (04/2002 – 10/2002)

- Tracked and Trended Lost and Unaccounted Gas Volumes and Energy
- Secured and Justified over \$200,000 in Funding for Field Equipment
- Updated Standard Procedures Manual, and Implemented New Procedures

#### U.S. Peace Corps, Volunteer Teacher, Namibia, Africa

- Taught Preparatory Classes for the Cambridge Examination
- Taught English as a Second Language (ESL), Mathematics, and Physical Science to 300+
   High School Students
- Facilitated Mathematics Workshops for Local High School Teachers

#### REGULATORY EXPERIENCE]

#### Arkansas Public Service Commission (APSC)

 Docket TF-090-TF. Request to Revise the Transient Voltage Surge Suppression Tariff Sheets

#### Public Utilities Commission of Texas (PUCT)

- Docket 47470. Application of Farmers Electric Cooperative, Inc. For Interim Update of Wholesale Transmission Rates
- Docket 48828. Application of Trinity Valley Electric Cooperative, Inc. For Interim Update of Wholesale Transmission Rates
- Docket 48212. Application of Golden Spread Electric Cooperative, Inc. to Amend its Certificate of Convenience and Necessity for the Conversion of Colorado River Municipal Water District's Private 69-kV Transmission Line to Public Use in Concho County
- Docket 48500. Application of Golden Spread Electric Cooperative, Inc. For Authority to Change Transmission Cost of Service and Wholesale Transmission Rates

#### Louisiana Public Service Commission (LPSC)

 Docket U-36923. Application of Cleco Power, LLC for (1) Implementation of Changes in Rates to be Effective July 1, 2024; and (2) Extension of Existing Formula Rate Plan









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#### EDUCATION

#### PROFESSIONAL AFFILIATIONS/ CERTIFICATIONS

American Society of Mechanical

#### EXPERTISE

Governmental, Industrial, and Utility

## MEGAN MORELLO

PROJECT MANAGER, P.E.



#### PROFILE

Ms. Morello has over 6 years of experience as an energy industry engineer and consultant, providing technical expertise in the management of industrial and utility projects. She has worked extensively with coal, natural gas, and renewable generation. Ms. Morello advises electric cooperative and municipal clientele on power generation asset management and procurement of new power resources. She provides research, analysis, and engineering support of power plant operations, integrated resource planning, procurement planning, RFP processes and evaluation, preparation of annual operating budgets, economic feasibility evaluations of generating resources, analyses of plant ownership opportunities, environmental allowance monitoring, resource adequacy planning and analysis, and regular market participation analysis. She evaluates and monitors operations data for various electric utility assets and provides analyses of plant performance to clients.

Ms. Morello has also worked with state regulatory offices to provide litigation support for utility rate cases, including assessments of power plant outages, utility industry best practices for operation and maintenance, and coal ash management as it pertains to state and federal regulatory requirements. Her experience also includes providing consulting services regarding natural gas usage and procurement, performing energy studies related to energy utility infrastructure, and performing solar and battery storage feasibility studies.

#### PROJECT EXPERIENCE

#### POWER SUPPLY ANALYSIS

Ms. Morello provides ongoing support and consulting services to electric cooperative and municipal clientele on power generation asset management and procurement of new power resources. She has extensive experience with research, analysis, and providing engineering support for plant operations, annual operating budgets, environmental allowance monitoring, resource adequacy planning, and market participation analysis in MISO, SPP, and ERCOT. She evaluates and monitors operations data for various electric utility assets and provides analyses of plant performance to clients.

- City of Alexandria, LA
- City of Kirkwood Electric Dept, MO
- East Texas Electric Cooperative, TX
- Hannibal Board of Public Works, MO
- Henderson Municipal Power & Light, KY
- Lafayette Utilities System, LA
- Northeast Texas Electric Cooperative, TX
- Virginia Municipal Electric Association, VA

#### INTEGRATED RESOURCE PLANNING AND GENERATION POTENTIAL STUDIES

City Water & Light, Jonesboro, AR (CWL). Performed a screening of future power generation supply alternatives for consideration in IRP planning to meet long-term capacity and energy requirements. Assessed current market conditions and legislative/regulatory policy implications that could impact generation options. Performed an analysis of CWL's load profile and load forecast, compiled pricing estimates and operations data for various generation options, and provided a detailed report covering potential combined cycle plants, peaking plants, solar facilities, battery storage, and solar/battery hybrid combined resources.

Owensboro Municipal Utilities, KY. Assisted with the development of Owensboro's 2022 Integrated Resource Plan (IRP) and evaluation of alternative power supply resources. Prepared analysis of various natural gas generation resources and developed production dispatch model for comparison of IRP portfolio options.





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## MEGAN MORELLO

PROJECT MANAGER, P.E.

#### PROFESSIONAL PROJECT EXPERIENCE [continued]

Fayetteville Public Works Commission, NC (FPWC). Assisted with the development of FPWC's 2021 Integrated Resource Plan (IRP) and evaluation of alternative power supply resources. Prepared production dispatch model for comparison of IRP sensitivity cases.

Huntsville Utilities, AL. Performed an analysis of Huntsville Utilities' power supply flexibility agreement with TVA and assessed the potential for self-supplying a portion of its power needs. Performed a study of feasible generation resources, compiled pricing estimates and operations data for various options, and provided a detailed report covering natural gas, solar, and battery storage options, including levelized cost of energy (LCOE) estimates.

Hastings Utilities, NE. Assisted with the development of Hastings Utilities' 2020 IRP study. Conducted a strategic power supply plan and analyzed generation and power supply alternatives in comparison to their existing resource portfolio.

#### POWER PROJECT PROCUREMENT EXPERIENCE

Central Electric Power Cooperative, SC (CEPCI). Assisted with the preparation of a request for proposals (RFP) for new natural gas generation resources. Performed assessment of responses/proposals received, including both ownership and power purchase agreement (PPA) options. Compiled proposed projects' data and assessed potential generation equipment, operating data, pricing structure, project costs, and LCOE for each proposal. Provided recommendations and engineering support for selection of projects.

Memphis Gas, Light, and Water, TN (MLGW). Prepared a request for proposals (RFP) for a thermal generation PPA for MLGW in accordance with selected IRP portfolios, including a proposal template and bid forms for submittals. Supported RFP process and supplied information for bidder Q&A. Compiled details of proposed projects including generation equipment, operating data, and PPA pricing structure. Performed evaluation and scoring of proposals based on the supplied data and provided recommendations to MLGW for selection of projects.

#### REGULATORY / JUDICIAL PROCEEDINGS

Minnesota Department of Commerce (MN DOC) -

- Case number E999/AA-20-171: Performed an investigation of Minnesota Power Company's unplanned outages at the Boswell coal power plant. Reviewed outages, assessed preventative maintenance plans in comparison with utility best practices, prepared and analyzed discovery questions and responses, and assisted with expert witness testimony.
- Case number G002/CI-21-610: Performed an investigation of Xcel Energy gas plant unplanned outages during a February 2021 extreme weather event. Reviewed outages, assessed prudency of maintenance practices in comparison with utility best practices, prepared and analyzed discovery questions and responses, and assisted with expert witness testimony.

North Carolina Department of Justice (NC DOJ). Provided litigation support to NC DOJ in case numbers E-2 Sub 1142 and E-7 Sub 1146 regarding Duke Energy Progress (DEP) and Duke Energy Carolinas (DEC) management of coal combustion residuals (CCR). Addressed related legal, regulatory, and financial implications. Reviewed CCR management practices, dam safety inspection reports, remediation options analyses, and closure plans at DEP and DEC coal facilities. Provided assessment of CCR-related problems, compliance with environmental regulations, corrective actions and penalties, and compliance with best practices. Assisted with preparation and analysis of discovery questions and responses, and preparation of expert witness testimony.



# MORELLO

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PROJECT MANAGER, P.E.

MEGAN

# CONTACT PROJECT EXPERIENCE [continued]

Office of the People's Counsel for the District of Columbia (DC OPC). Consulted DC OPC on case number FC 1156, regarding the Potomac Electric Power Company's (PEPCO) Benning/Anacostia site environmental remediation. Addressed the site investigation, remediation, and the associated costs PEPCO sought to recover. Provided research, prepared and analyzed discovery questions and responses, and assisted with expert witness testimony on behalf of ratepayers.

South Carolina Office of Regulatory Staff (SC ORS). Provided litigation support to SC ORS in case numbers 2018-318-E, 2018-319-E, and 2022-254-E regarding Duke Energy Progress (DEP) and Duke Energy Carolinas (DEC) management of coal combustion residuals (CCR). Addressed related legal, regulatory, and financial implications. Reviewed CCR management practices, dam safety inspection reports, remediation options analyses, and closure plans at DEP and DEC coal facilities. Provided assessment of CCR-related problems, compliance with environmental regulations, corrective actions and penalties, and compliance with best practices. Assessed proposed and implemented changes to CCR regulations from the EPA. Assisted with preparation and analysis of discovery questions and responses, and preparation of expert witness testimony.

#### NATURAL GAS SUPPLY CONSULTING EXPERIENCE

Metropolitan Atlanta Rapid Transit Authority (MARTA). Provided consulting services regarding natural gas usage and procurement for MARTA in Atlanta, GA. Work included the monitoring and verification of fuel usage, resolution of vendor disputes, preparation of requests for bids and fuel supply contract terms, RFP administration, evaluation of proposals, advising on applicable natural gas credits, and assisting with forward purchasing options.

*Emory University and Healthcare (Emory)*. Provided consulting services regarding natural gas usage and procurement for Emory University and Healthcare in Atlanta, GA. Work included the preparation of requests for bids and fuel supply contract terms, RFP administration, and evaluation of proposals. Ongoing work includes providing regular market insight for the purposes of budgeting and hedging, as well as assisting with forward purchasing options.

#### **ENERGY STUDIES EXPERIENCE**

Georgia Environmental Finance Authority (GEFA). Performed solar and battery resiliency studies on behalf of GEFA for multiple cities, counties, and towns throughout Georgia. Assessed the feasibility of and provided cost estimates for the installation and operation of solar and battery storage systems for municipal buildings, offices, and emergency shelters. Created a "best practices guide" and a resiliency system procurement RFP template for use in future assessments.

Minnesota Department of Commerce (MN DOC). Performed conservation study to estimate the potential energy savings and carbon reduction of improvements to electric utility infrastructure assets owned and operated by utilities serving Minnesota customers.









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Marietta GA 30067

#### EDUCATION

Bachelor of Science in Engineering University of South Florida, 1993

#### PROFESSIONAL AFFILIATIONS/ CERTIFICATIONS

IEEE, Power Engineering Society

#### EXPERTISE

Regional Transmission Organization Operations and Policy Support

**Energy Market Design** 

Open Access Transmission Issues

Transmission System Modeling and Planning

Production Cost Modeling and

Generation Interconnection Process Evaluation and Support

NERC Compliance Activities

Regulatory, Strategic and Stakeholder Support

# JOHN Chiles, Jr.

PRINCIPAL



#### PROFILE

Mr. Chiles has over 35 years of electric utility and consulting experience in transmission system planning and policy, open access issues, interconnection and deliverability analysis, energy trading and transaction scheduling, balancing authority operations and energy market design. He has worked in several sectors of the energy industry, including electric cooperatives, municipal joint action agencies, investor-owned utilities, and merchant energy/IPP companies. Prior to coming to GDS, he was responsible for managing the daily transmission portfolio for the two largest merchant power plants in the United States and coordinating a generator-only control area in the WECC region. He provides strategic advice to clients as a stakeholder representative at various Regional Transmission Organizations and serves as an expert witness before state commissions and the FERC on RTO transmission and market issues, integrated resource planning, transmission expansion plan evaluation, transmission facility need determination and transmission open access for load and generation customers.

#### PROFESSIONAL EXPERIENCE

GDS Associates, Inc. September 2005-present

Principal, Transmission Services

As a Principal at GDS, Mr. Chiles consults with utilities, government agencies, and industrial clients in the following areas:

- Served as Stakeholder Representative for clients within Entergy, the Midcontinent Independent System Operator (MISO) and the Southwest Power Pool (SPP) on matters related to transmission expansion planning and market design
- Assisted multiple clients during the Entergy integration into MISO, including conversion of transmission rights, valuation of generation assets, and Day 2 market preparation
- Provided generation interconnection support services for renewable and fossil-fuel based facilities, including siting analysis, technical study support, client representation with Transmission Providers, and negotiation of Interconnection Agreements
- Filed expert witness testimony at FERC and State jurisdictions regarding transmission facility need determination, transmission loss calculations, integrated resource planning and Regional Transmission Organization (RTO) integration activities
- Conducted NERC mock audits on Transmission Planning (TPL), Facility Rating (FAC), and Modeling (MOD) Standards for numerous municipal and cooperative organizations
- Supported generation procurement Request for Proposals (RFPs) through providing technical and strategic support on transmission issues

# **TECO Energy,** Tampa, FL, January 2000 – January 2004 *Manager*

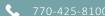
- Monitored and provided corrective action on NERC compliance
- Served as Southwest Reserve Sharing Group and WECC Operating Committee representative
- Developed generation optimization process to achieve optimal dispatch of 2,200 MW plant to meet NERC criteria
- Optimized daily transmission positions for 4,400 MW asset portfolio (\$3MM/month)
- Determined transmission deliverability (ATC, Generator Operating Limit) to support balance of month and originated transactions
- Provided regulatory support on issues at FERC and state levels
- Assisted in development of and modifications to ERCOT protocols
- Determined how changes in regional markets impacted profitability of asset portfolio



# JOHN CHILES, JR.

PRINCIPAL

#### CONTACT







Marietta GA 30067

#### PROFESSIONAL EXPERIENCE [continued]

- Represented company at FERC, SeTrans and State jurisdictions
- Developed and Presented of 5- and 10-Year expansion plans
- Representative on GridFlorida Flowgate Working Group
- LMP analysis for TECO Assets

## North Carolina Electric Membership Corporation, Raleigh, NC, 1994 –1999

#### Project Engineer

- Impacts of FERC Order 888 and 889 on member systems; reviewed and analyzed wholesale provider transmission expansion plans
- Transmission-Dependent Utility representative on SERC ATC Working Group
- OASIS site testing
- Consulting support to PA Cooperative group for PA Retail Access Program
- Expansion plan development for Duke Energy, Carolina Power & Light, Dominion Virginia
   Power
- RFP bid evaluation
- Evaluation of Structured Transactions for external sales

#### EXPERT WITNESS TESTIMONY

#### Federal Energy Regulatory Commission (FERC)

- PJM Interconnection, LLC, American Transmission Systems, Inc., Docket No. ER12-2399-003
- Southwestern Electric Cooperative, Inc., et al., Docket Nos. EL15-72, et al., Panel Member for Technical Conference

#### Arkansas Public Service Commission (APSC)

 In the Matter of a Show Cause Order Directed to Entergy Arkansas, Inc. Regarding Its Continued Membership in the Current Entergy System Agreement, or Any Successor Agreement Thereto, and Regarding the Future Operation and Control of Its Transmission Assets, Docket No. 10-011-U

#### Georgia Public Service Commission (GPSC)

- In the Matter of: Georgia Power Company's 2010 Integrated Resource Plan, Docket No. 31081
- In the Matter of: Georgia Power Company's 2013 Integrated Resource Plan, Docket No. 36498
- In the Matter of: Georgia Power Company's 2016 Integrated Resource Plan, Docket No. 40161
- In the Matter of: Georgia Power Company's 2019 Integrated Resource Plan, Docket No. 40161
- In the Matter of: Georgia Power Company's 2022 Integrated Resource Plan, Docket No. 40161

#### Mississippi Public Service Commission (MPSC)

 In Re: Joint Application of Entergy Mississippi, Inc., and The Midwest Independent Transmission System Operator, Inc., for Transfer of Functional Control of Entergy Mississippi's Transmission Facilities To MISO, Docket No. 2011-UA-376

#### Public Utility Commission of Texas (PUCT)

- Entergy Gulf States, Inc.'s Transition to Competition Plan, PUC Docket No. 33687



# JOHN CHILES, JR.

#### CONTACT





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#### EXPERT WITNESS TESTIMONY [continued]

- Application of Sharyland Utilities, L.P. to Approve Study and Plan Pursuant to the Commission's Order in Docket No. 37990 Concerning the Movement of Sharyland's Stanton and Colorado City Divisions from the Southwest Power Pool to ERCOT, PUC Docket No. 39070
- Application of Entergy Texas, Inc., ITC Holdings Corp., MidSouth Transco LLC, Transmission Company Texas, LLC, and ITC MidSouth LLC for Approval of Change of Ownership and Control of Transmission Business, Transfer of Certification Rights, Certain Cost Recovery Approvals, and Related Relief, PUC Docket No. 41223
- Updated Application of Entergy Texas, Inc., ITC Holdings Corp., Mid-South Transco LLC, Transmission Company Texas, LLC, and ITC Midsouth LLC for Approval of Change of Ownership and Control of Transmission Business, Transfer Of Certification Rights, and Related Relief, PUC Docket No. 41850

#### Commonwealth Of Virginia State Corporation Commission Division of Energy (VSCC)

- Virginia Electric and Power Company for Approval and Certification of Electric Facilities for the Surry-Skiffes Creek 500 kV Transmission Line, Skiffes Creek-Whealton 230 kV Transmission Line, and Skiffes Creek 500 kV-230 kV-115 kV Switching Station, Case No. PUE-2012-00029
- Virginia Electric and Power Company for Approval and Certification of Electric Transmission Facilities for the Remington CT-Warrenton 230 kV Double Circuit Transmission Line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV Transmission Lines, 230 kV Vint Hill Switching Station, and 230 kV Wheeler Switching Station, Case No. PUE-2014-00025

#### DETAILED EXPERTISE

#### Regional Transmission Organization Operations and Policy Support

- Market Integration Support for new entrants in California Independent System Operator (CAISO), SPP and MISO
- Market Analysis of Nodal Price Data
- Technical Support on RTO Settlements Issues

#### **Energy Market Design**

- Nodal Market Development (ERCOT)
- Resource Adequacy Market Development (PJM)
- Energy Imbalance Market Development (SPP, WECC)

#### **Open Access Transmission Issues**

- Loss Study Review and Support
- Deliverability Analysis for Generation Assets
- Negotiation of Agreements for Transmission Service

#### Transmission System Modeling and Planning

- Power Flow Analysis
- Short Circuit Analysis
- Need Certification Technical Studies
- Review of Impact of Transmission Expansion Plans on Load and Generation

#### **Production Cost Modeling and Simulation**

- PROMOD Studies for Generation Margin Determination and Load Cost Analysis
- Assessment of Economic Transmission Projects
- Financial Transmission Rights Evaluation



# JOHN CHILES, JR.

PRINCIPAL

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Marietta GA 30067

#### DETAILED EXPERTISE [continued]

#### Generation Interconnection Process Evaluation and Support

- Power Flow-Based Site Selection Analysis
- Technical Support for Review of Transmission Provider Studies
- Negotiation of Interconnection Service Agreements

#### **NERC Compliance Activities**

- TPL Assessments
- Development of Policies, Guidelines and Procedures
- Mock Audits and Gap Analysis
- Subject Matter Expert Training for TPL, FAC, and MOD Standards

#### Regulatory, Strategic and Stakeholder Support

- Stakeholder Representation at MISO, SPP, and ERCOT
- Technical and Regulatory Support for Clients at FERC and State Jurisdictions



# **APPENDIX B. GDS Associates, Inc. Billing Rates**

PERSONNEL STANDARD

CATEGORY/NAME BILLING RATES

1. Client shall compensate GDS Associates for the Services of the following named individuals and for all other individuals by personnel category in connection with each Project Assignment as follows:

$\mathbf{O}$	FFI	CFR	25		PRI	NC	'ID	214
v	ГГІ	CLD		-	rni			H L.J

1.	BILL BATEMAN	\$330.00
2.	BRUCE A. BENNETT	\$310.00
3.	DAVID M. BRIAN	\$370.00
4.	PATRICK S. BRIN	\$340.00
5.	SETH W. BROWN	\$340.00
6.	GARY D. BRUNAULT	\$380.00
7.	MATHEW BUTLER	\$330.00
8.	JOHN W. CHILES	\$340.00
9.	GARRETT D. COLE	\$330.00
10.	CHRISTOPHER C. DAWSON	\$340.00
11.	ANTHONY E. HINKELMANN	\$340.00
12.	JEFFREY R. HUBER	\$340.00
13.	STEVEN HUNT	\$350.00
14.	ROY M. LEWIS	\$340.00
15.	CHARLES E. LOY	\$330.00
16.	BREANDAN MAC MATHUNA	\$330.00
17.	JACK D. MADDEN	\$370.00
18.	KEVIN J. MARA	\$340.00
19.	KRISTIN MCALPINE	\$280.00
20.	MATTHEW S. PAMPERIN	\$300.00
21.	ERNESTO PEREZ	\$320.00
22.	JESSICA O. ROZIER	\$315.00
23.	MATT SISKA	\$280.00
24.	MICHELE SLATER	\$330.00
25.	JACOB THOMAS	\$330.00
26.	BRAXTON UNDERWOOD	\$300.00

#### MANAGING DIRECTORS/EXECUTIVE ENGINEERS/EXECUTIVE CONSULTANTS

28.	SCOTT G. BILLIOT	\$340.00
29.	CLAUDIU E. CADAR	\$330.00
30.	HOWARD CHOY	\$340.00
31.	JAMES W. DANIEL	\$370.00
32.	ROBERT C. DEW	\$300.00
33.	THOMAS G. GEBHARD, JR.	\$340.00
34.	KEVIN GOOLSBY	\$330.00

	PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES
35.	AMBER GSCHWEND	\$330.00
36.	RICHARD J. HACKNER	\$310.00
37.	RICH HASSELMAN	\$340.00
38.	PAUL A. HUBER	\$340.00
39.	JOHN W. HUTTS	\$330.00
40.	MATTTHEW J. KING	\$370.00
41.	LYNN M. LANIER	\$330.00
42.	R. BRIAN LAWSON	\$370.00
43.	W. RICHARD LOVELACE	\$240.00
44.	JANICE NICHOLAS	\$330.00
45.	RICHARD POLICH	\$340.00
46.	JULIO ROVI	\$340.00
47.	BRENT A. SAYLOR	\$330.00
48.	J. STEVEN SHURBUTT	\$340.00
49.	ROBERT C. SMITH	\$395.00
50.	J. BERTRAM SOLOMON	\$435.00
51.	RICHARD F. SPELLMAN	\$370.00
52.	JAMES STRIEDEL	\$340.00
53.	GAIL TABONE	\$340.00
54.	DON TRETHWAY	\$370.00
55.	BRUCE W. WALTER	\$380.00
56.	PAUL WIELGUS	\$340.00
57.	FRANCESCA WINTER	\$320.00
58.	DAN WITTLIFF	\$340.00
	OR PROJECT MANAGERS	
59.	HENRY H. ARMISTEAD	\$340.00
60.	JEREMY E. BLANCHARD	\$260.00
61.	T. DANIEL BURAPAVONG	\$285.00
62.	ALFRED W. BUSBEE	\$290.00
63.	JOSHUA H. DUCKWALL	\$340.00
64.	LEA FISHER	\$320.00
65.	KRISTIN D. GILL	\$280.00
66.	ROBERT D. GOSS	\$320.00
67.	KYLE HAEMIG	\$320.00
68.	MICHAEL IVEY	\$310.00
69.	TERRY M. MYERS	\$330.00
70.	GARY A. POOLE	\$290.00
71.	RUSS W. SCHNEIDER	\$290.00

	PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES
72.	PERRY SERVEDIO	\$320.00
73.	JASON C. SETTLE	\$310.00
74.	JASON A. SHOOK	\$320.00
75.	KENNY SMITH	\$320.00
76.	ROBERT B. TAYLOR	\$315.00
77.	BRANDON WARE	\$320.00
78.	NICHOLAS R. WEAVER	\$290.00
PROJ	ECT MANAGERS	
79.	JENNIFER BRINKER	\$250.00
80.	AUDREY A. COBB	\$265.00
81.	JAMES GARREN	\$275.00
82.	LINDA M. GRAY	\$260.00
83.	RACHAEL A. HARMS	\$260.00
84.	JUSTIN T. HEY	\$280.00
85.	TRAVIS J. HINCK	\$280.00
86.	WARREN E. HIRONS	\$280.00
87.	DANIEL IRVING	\$255.00
88.	MEGAN C. MORELLO	\$280.00
89.	JODY W. PACK	\$280.00
90.	JOSEPH A. RANDO	\$250.00
91.	BETHANY REINHOLTZ	\$250.00
92.	SYDNEY A. SPRAGUE	\$280.00
93.	CHAD E. WHITEHEAD	\$280.00
94.	MAREKS ZVIEDRITIS	\$260.00
SENIC	OR PROJECT ENGINEERS	
95.	PAUL R. GIGUERE	\$220.00
96.	SEUNG K. KIM	\$330.00
97.	SCOTT E. MAHNKEN	\$330.00
98.	MATTHEW T. SMITH	\$320.00
SENIC	OR PROJECT CONSULTANTS	
99.	MARIAELENA EICK	\$260.00
100.	JOSEPH R. HOFFMAN	\$305.00

	PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES						
_	SENIOR DATA ANALYST							
101.	MICHAEL GREER	\$280.00						
SYSTE	MS ANALYST							
102.	JESSICA A. BOWRON	\$220.00						
ASSO	CIATE SOFTWARE ENGINEER							
103.	ANDRE DUMAS	\$220.00						
IT PRO	DIECT CONSULTANT							
104.	LEVI COWAN	\$220.00						
PROJE	CT ENGINEERS							
105.	KATIE C. BARRETT	\$210.00						
106.	ERIC BENNETT-PARKER	\$230.00						
107.	KATHY ESTRADA	\$230.00						
108.	ALYSSA M. GIANOTTI	\$205.00						
109.	KYLE LANCASTER	\$210.00						
110.	KYLE NICKERSON	\$205.00						
111.	LEAH C. PUETT	\$230.00						
112.	CARLY SMITH	\$230.00						
113.	ANTENEH E. WORKNEH	\$230.00						
114.	MELISSA M. YOUNG	\$210.00						
PROJE	CT CONSULTANTS							
115.	MIKE CASTELHANO	\$230.00						
116.	MICHAEL COTY	\$205.00						
117.	JAMES FERNSTERMAKER	\$230.00						
118.	JORDAN P. JANFLONE	\$230.00						
119.	RODNEY D. RHOADS	\$230.00						
	KATE ST. CLAIR	\$205.00						
121.	KAYTIE D. ZAPATOS	\$230.00						
PROJE	CT CONSULTANT – SETTLEMENTS, CREDIT & REPORTING							
122.	ASHLEY D. WENTWORTH	\$230.00						
DIREC	TOR, HUMAN RESOURCES							
123.	JULIE P. AYERS	\$190.00						

PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES
ENGINEERS  124. REBECCA R. DOW-GEORGE  125. MARK S. HOPPER  126. JACKIE WENGENROTH	\$190.00 \$180.00 \$180.00
ANALYSTS  127. WALTER J. BEARD  128. DANIEL CORDELL  129. LARA L. GAREY  130. ED KIOLBASA  131. ABBY M. PHELPS  132. MARK A. STEINMETZ  133. JACOB D. UNDERWOOD  134. DENA WEIHERT  135. TINA R. WILLIAMS	\$190.00 \$185.00 \$190.00 \$190.00 \$190.00 \$180.00 \$180.00 \$185.00
ENERGY ADVISOR  136. BRIAN JONES  SENIOR PROJECT COORDINATOR	\$180.00
137. JENNIFER A. THORNTON  MARKETING MANAGER  138. VICTORIA L. HOFFMAN	\$160.00 \$160.00
ACCOUNTING MANAGER 139. CATHY HUANG	\$160.00
ASSOCIATE ENGINEERS  140. MICHAEL BRUNNER  141. THOMAS BRUNNER  142. NOAH FIORAVANTE  143. KYRA GREEN  144. KATELYN LOPEZ  145. RACHEL M. MYERS  146. PRIYANGA NATARAJAN  147. ZOE SZCZESNIAK	\$160.00 \$160.00 \$150.00 \$160.00 \$160.00 \$160.00 \$160.00
ASSOCIATE ANALYSTS  148. CHRISTY A. BOCKHEIM  149. WILLIAM M. MURPHY	\$155.00 \$165.00

	PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES	
SENIOR HUMAN RESOURCES GENERALIST			
150.	TRISHA L. WITTMANN	\$160.00	
STAKING TECHNICIANS			
151.	DAVID B. BASHORE	\$160.00	
152.	JOEL BIBBLE	\$160.00	
153.	SCOTTY BLACK	\$160.00	
154.	WILLIAM J. FERGUSON	\$160.00	
155.	JUAN JIMENEZ	\$160.00	
156.	MARK MCDOWELL	\$160.00	
157.	JOHN SEASE	\$160.00	
158.	LAWRENCE E. TAUNTON	\$160.00	
159.	RONALD J. WEAVER	\$160.00	
FIELD TECHNICIANS			
160.	ZASCH BYLSMA	\$130.00	
161.	ADAM CRAIG	\$130.00	
162.	CHRISTOPHER E. DUNBAR	\$110.00	
163.	KAYLA A. MILLETT	\$110.00	
164.	ISABELLA MONBOUQUETTE	\$110.00	
165.	KATHERINE WHITE	\$110.00	
EXECUTIVE ASSISTANTS			
166.	DIANE R. RUNNING	\$130.00	
OFFICE MANAGERS			
167.	LISA BROCHU	\$110.00	
168.	LISA D. PARKER	\$130.00	
169.	VIVIAN THOMPSON	\$130.00	
SENIOR ACCOUNTING SPECIALISTS/ACCOUNTING SPECIALISTS			
170.	VITA CHEN	\$130.00	
171.	CANDACE L. CLIFTON	\$130.00	
172.	STEVEN POTHEL	\$130.00	
173.	MELISSA ROGERS	\$130.00	
SENIOR ENGINEERING ASSISTANTS			
174.	CHRISTOPHER E. DECKER	\$130.00	
175.	JP HAMEL	\$130.00	
176.	DANE K. HUBER	\$130.00	
	CHRISTOPHER G. MERRILL	\$130.00	
178.	RYAN E. PHINNEY	\$130.00	

PERSONNEL CATEGORY/NAME	STANDARD BILLING RATES
PROJECT COORDINATOR 179. MADDY REED	\$130.00
HUMAN RESOURCES GENERALIST 180. GRACE RICE	\$130.00
ENGINEERING ASSISTANTS  181. SAMANTHA DWIRE  182. ASMITA KC  183. DAVID B. MACHON  184. GWENDOLYN K. STOKER	\$110.00 \$110.00 \$110.00 \$110.00
ADMINISTRATIVE ASSISTANTS  185. DENISE T. CZEPIEL  186. KAYLA G. MCINROY  187. KATHERINE TEED  188. MELANIE WARD	\$110.00 \$110.00 \$110.00 \$110.00
CALL CENTER ASSOCIATE  189. KRISTIN CLENDENING	\$110.00
CO-OPS/INTERNS  190. AMANDA LYNCH  191. IAN PURRINGTON  192. LAUREN SHERRARD  193. DAVID WILKERSON	\$110.00 \$110.00 \$110.00 \$110.00

PREPARED BY GDS ASSOCIATES, INC.



# Louisiana Public Service Commission

Request for Certification of the Construction of the Bayou Power Station, Including Cost Recovery

May 2024

