

EMRYDIA

March 5, 2023

Kimberly N. O'Brian, and Kathryn H. Bowman
Louisiana Public Service Commission
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Attention: Kimberly N. O'Brian and Kathryn H. Bowman

**RE: RFP 23-09
DOCKET NO. TBD, CLECO POWER, LLC'S UPCOMING RATE
PROCEEDING TO BE FILED IN MARCH 2023 AS REQUIRED BY
COMMISSION ORDER NO. U-35299.**

Dear Kimberly O'Brian and Kathryn Bowman:

Please accept the enclosed proposal as Emrydia Consulting Corporation's (Emrydia) response to your request for a proposal to provide services to the Louisiana Public Service Commission (PSC).

Emrydia's employees and consultants have decades of experience in regulatory matters in jurisdictions across North America. Emrydia possesses significant experience supporting consumer advocates before regulatory tribunals and is uniquely positioned to assist the PSC in all areas within the scope of work set out in the RFP. Emrydia appreciates the opportunity to discuss its qualifications and response further if necessary.

Thank you for considering Emrydia for this project. If you require any further clarification on this proposal, please do not hesitate to contact me at any time by the phone or email address provided below.

Yours truly,



Dustin Madsen CPA, CA, CPA (IL, USA), CDP, CRRA
President of Emrydia Consulting Corporation (U.S. and Canada)

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EMRYDIA CONSULTING CORPORATION

PROPOSAL TO PROVIDE SERVICES TO LOUISIANA PUBLIC SERVICE COMMISSION

RFP 23-09

**DOCKET NO. TBD, CLECO POWER, LLC'S UPCOMING RATE PROCEEDING TO
BE FILED IN MARCH 2023 AS REQUIRED BY COMMISSION ORDER NO. U-35299**

PREPARED BY

DUSTIN MADSEN, CPA, CA, CPA (IL, USA), CDP, CRRA

ATTENTION

KIMBERLY N. O'BRIAN AND KATHRYN H. BOWMAN

SUBMITTED ON

MARCH 5, 2023

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Introduction and Executive Summary

Emrydia Consulting Corporation (Emrydia) is incorporated in both the United States of America (Nevada) and Canada (Alberta). Emrydia's business addresses are as follows:

401 Ryland St. Suite 200-A
Reno, NV 89502

304 8 Ave SW Suite #620
Calgary, AB T2P 1C1

Emrydia provides professional services and expertise in the areas of accounting, tax, finance, cost-of-service, rate design, tariffs, economics, depreciation, cost of capital, engineering, prudence assessment, revenue requirement, legal analysis and opinions, and broad/narrow regulatory issues.

Emrydia submits the within response to RFP 23-09 of the Louisiana Public Service Commission (PSC) to perform the services outlined in the RFP for a combined price not to exceed an amount of \$165,352.50. Emrydia has responded to each of the RFP requirements within the following sections:

- Summary of Emrydia's experience.
- List of key individuals and experience.
- Work plan.
- Detailed cost and price proposal.
- Statement regarding potential conflicts of interest.
- Employer identification information.
- Confirmation of RFP terms.
- Confidentiality.
- Copies of curriculum vitae.

Summary of Emrydia's experience

The primary focus of Emrydia's business is regulated utilities. All Emrydia's employees and consultants are former managers or employees of investor-owned regulated utilities operating more than a billion dollars in regulated assets or have direct experience within regulators. One of Emrydia's consultants is a former commissioner.

Emrydia's employees and consultants possess decades of regulatory experience (in aggregate hundreds of years) preparing evidence and submissions for consumer advocates, utilities, regulators, and other interested parties before regulatory bodies, in a variety of U.S. and Canadian jurisdictions. The focus of Emrydia's business is on providing expert services to customer groups and other parties intervening in regulated utility applications, as well as providing expert services to regulators.

List of key individuals and experience

Emrydia's employees and consultants possess industry recognized credentials to support their expertise in the matters covered within the scope of services. Several of Emrydia's employees and consultants have taught, or published papers and other scholarly work on matters relevant to the scope of work.

Emrydia's consultants have prepared evidence and testified on virtually every aspect of regulated utility revenue requirements. This includes every aspect of the scope of work set out in the RFP. Emrydia's consultants regularly assist in all facets of regulatory applications from case management to preparing legal briefs, motions, interrogatories, and assisting in cross examination.

As the proceeding evolves, if required and approved by the PSC, Emrydia can supplement its team with a wide variety of resources to address specific needs unique to the application. This includes economists, engineers, experts in renewable energy, and various other experts. However, based on the preliminary outline of work, Emrydia considers a limited group of consultants is sufficient to address the PSC's needs. Specifically, Emrydia proposes to provide the services of the following two key individuals:

- Dustin Madsen, CPA (IL, USA), CPA, CA, CDP, CRRA (~20 years of experience).
- David Garrett, B.B.A, M.B.A, J.D., CDP, CRRA (~17 years of experience).

Mr. Madsen and Mr. Garrett possess a wide range of expertise and are highly qualified and regarded by their peers in the regulated utility industry. Both Mr. Madsen and Mr. Garrett hold

the title of Certified Depreciation Professional and Certified Rate of Return Analyst. Mr. Madsen and Mr. Garrett have collaborated on several recent engagements and were recently awarded a contract for services by the State of Delaware Division of the Public Advocate. The experience of each individual is described in further detail below. A summary curriculum vitae is provided for each individual at the conclusion of this evidence. Further details of the experience and engagements for each individual is available if required.

Dustin Madsen, CPA, CA, CPA (IL, USA), CDP, CRRA

Mr. Madsen has 20 years of experience in auditing, accounting and regulated businesses. He received a Bachelor of Commerce, major in accounting, awarded with Great Distinction from the University of Saskatchewan. He is a Canadian Chartered Professional Accountant and Chartered Accountant registered with CPA Alberta, as well as a US Certified Public Accountant registered with the Illinois Department of Financial and Professional Regulation. He is also a Certified Depreciation Professional with the Society of Depreciation Professionals and a Certified Rate of Return Analyst with the Society of Utility and Regulatory Financial Analysts.

Mr. Madsen has testified on numerous occasions and has presented evidence for clients on virtually all aspects of utility regulatory filings, including cost-of-service rate design, revenue requirement mechanics, depreciation, cost of capital, income taxes, deferral accounts, operating costs, capital costs, assessment of prudence of costs, and various other matters. He has been involved in more than 50 unique and large applications representing consumer interests. He has a broad base of experience and has provided services and advice to regulators, utilities and a variety of different ratepayer focused groups, including broad-based consumer groups and advocates, residential ratepayers, industrial ratepayers and landowners. This experience is unique and provides Mr. Madsen with a unique perspective that is uncommon in the industry. Mr. Madsen continues to maintain clients in all these groups.

Mr. Madsen was formerly a manager and consultant for two regulated utilities operating billions of dollars in regulated assets. He also previously provided business valuation services in support of Berkshire Hathaway Energy's acquisition of utilities in Canada. Mr. Madsen has also taught numerous courses and presented at more than a dozen conferences on virtually all aspects of utility revenue requirements and detailed U.S. and Canadian accounting requirements. Mr. Madsen was formerly an auditor with Deloitte prior to commencing work in the regulated utility industry.

To date, Mr. Madsen's practice has focused on Canadian jurisdictions which are subject to the same regulatory requirements as U.S. utilities. Mr. Madsen has provided services to consumer advocates and regulators in nearly every major Canadian jurisdiction, including Ontario, British Columbia, Alberta, Manitoba, New Brunswick, and the Northwest Territories. As noted earlier, Mr. Madsen has also been engaged to provide services in the State of Delaware.

David Garrett, B.B.A, M.B.A, J.D., CDP, CRRA

Mr. Garrett received a B.B.A., with a major in Finance, an M.B.A., and a Juris Doctorate from the University of Oklahoma. Mr. Garrett worked in private legal practice and as assistant general counsel at the Oklahoma Corporation Commission. He subsequently worked for the Oklahoma Corporation Commission's Public Utility Division as a regulatory analyst providing expert testimony in rate case proceedings in the areas of fuel procurement, employee compensation, return on equity, and depreciation. After leaving the Commission, Mr. Garrett represented various consumers and consumer groups, including large industrial customers, large gaming customers, cities, commercial customers, renewable resource intervenors, and state consumer advocates in utility regulatory proceedings, primarily in the areas of cost of capital and depreciation.

Mr. Garrett is a Certified Depreciation Professional through the Society of Depreciation Professionals. He is also a Certified Rate of Return Analyst through the Society of Utility and Regulatory Financial Analysts.

Mr. Garrett has been involved in excess of 40 different proceedings before a variety of regulators including the Railroad Commission of Texas, Public Service Commission of South Carolina, Pennsylvania Public Utility Commission, Public Utility Commission of Texas, Oklahoma Corporation Commission, and others.

Mr. Garrett's experience includes engagements in several U.S. states, including Washington, Texas, Florida, California, New York, Pennsylvania, Delaware, Michigan, South Carolina, and other states. Mr. Garrett also assisted a client in a limited manner in a Louisiana rate case related to cost of capital matters.

Work plan

Emrydia's consultants have extensive experience participating in a wide range of proceedings, including condensed proceedings spanning a couple months and extended matters spanning many years. Emrydia's consultants also have significant experience dealing with simple to complex applications, with some applications having a record of hundreds of thousands of pages. In each instance, the work plan is unique to the specific matter and often the requirements and schedule evolve over time. For this reason, Emrydia remains flexible in its resourcing and works with its clients to ensure all deliverables are completed on schedule.

The PSC's RFP set out the following requirements for technical services, in addition to a range of general requirements:

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- Appropriate accounting standards and practices for electric public utilities, public utility accounting, and generally accepted auditing standards;
- The appropriate ratemaking adjustments to be made to the utility's accounting records;
- The determination and calculation of the appropriate rate base of a utility plant investment dedicated to providing service;
- Traditional cost-of-service and cost allocation methodologies supporting the revenue requirements among classes of customers;
- The cost allocation methodologies for the allocation of investment and expenses between affiliates, including the relationship of the holding company to its subsidiary operating companies, the transfer of investment and costs between operating companies, and the provision of services between affiliates;
- Cost of capital, including capital structure, cost of debt, cost of equity and rate of return;
- Just and reasonable costs and prudent investments associated with providing reliable and quality service as recommended by NARUC;
- Formula rate plans;
- Depreciation and taxation;
- Experience and familiarity with prior Cleco Power rate cases, including but not necessarily limited to Order No. U-35299; and
- A detailed understanding of electric utility regulation.

Regarding the general requirements, Emrydia confirms that both Mr. Madsen and Mr. Garrett are experts in and knowledgeable in all aspects of the regulated utility industry in North America. As noted earlier, both individuals have testified before multiple regulatory tribunals, and represented the interests of nearly every type of intervener (i.e., residential, commercial, industrial landowners, special purpose, etc.).

Both Mr. Madsen and Mr. Garrett have hands on experience with utilities. As an example, Mr. Madsen was a former manager in the regulatory and budgeting departments of two large investor-owned utilities with both Canadian and U.S. utility operations. In these roles, Mr. Madsen lead the development of all regulatory applications, including preparation of detailed rate base schedules, rates of return, operating costs, revenues, revenue offsets, revenue adjustment mechanisms, capital recovery mechanisms, prudence assessments, affiliate transactions, rate riders, depreciation and working capital studies and virtually every other aspect of utility applications. Since that time, Mr. Madsen has provided similar consulting services to participants in regulated utility applications and has filed evidence on virtually every aspect of utility regulation. Mr. Madsen also has extensive experience teaching and is scheduled to present at the Society of Depreciation Professionals September Annual Conference on the interdependency between depreciation and return.

Mr. Garrett similarly has extensive knowledge of regulated utilities and has chosen to focus his practice on cost of capital and depreciation related matters. Mr. Garrett has filed extensive evidence on these matters in front of many U.S. regulators, and is similarly involved in the industry as a past president of the Society of Depreciation Professionals and active member.

Regarding the specific requirements, Emrydia offers the following summary response of experience pertaining to each of the items listed above:

- Mr. Madsen is a highly regarded expert in accounting having testified on U.S. and Canadian accounting standards. Mr. Madsen also maintains an in depth understanding of regulated utility accounting requirements having both testified to these matters and taught courses on utility finance. Finally, Mr. Madsen is a former auditor and has extensive experience applying generally accepted auditing standards, as well as filing evidence and testimony in relation to utility cost and performance audits.
- Mr. Madsen has extensive experience both preparing and reviewing the reasonableness of adjustments made to utility accounting records. Regulated accounting books rarely directly line up with the financial accounting books, and Mr. Madsen is familiar with all the common adjustments and many of the complex unusual adjustments that are made to reconcile the two sets of books.
- Mr. Madsen has filed extensive evidence on the required level of rate base, including the reasonableness of opening rate base additions, forecast additions, deferral and reserve accounts including the mechanics of such accounts, and intricate rate base matters such as including construction work in progress in rate base to improve credit metrics.
- Mr. Madsen has prepared for utilities the cost allocation methodologies to determine proper cost-of-service as required by NARUC, including evidence on embedded and marginal cost of service rates. Mr. Madsen is also currently retained in a proceeding to file evidence on a cost-of-service study for a group of small and medium commercial customers, and has provided expert advice to a utility on cost-of-service issues, including the preparation of a cost-of-service study.
- Mr. Madsen has assisted in affiliate related transactions from both the utility and customer perspective, including preparing evidence on the direct and indirect methods of assigning costs between affiliates, reviewing the reasonableness of affiliate transactions, and assessing sales of utilities to other parties from the perspective of the “no harm” test.
- Both Mr. Madsen and Mr. Garrett have extensive cost of capital experience. Both individuals are Certified Rate of Return Analysts. Mr. Madsen and Mr. Garrett have filed evidence on all cost of capital matters, including capital structure, cost of debt, cost of equity and overall rates of return. This evidence includes the preparation of detailed calculations required to support recommendations. In the context of the cost of equity, the evidence has included the preparation of single and multi-factor CAPM models, single and multi-stage DCF models, comparable earnings calculations, bond yield risk premium models, and a variety of other calculations

to support recommendations, including detailed calculations of equity risk premium.

- Mr. Madsen has testified extensively on the reasonableness and prudence of utility investments, including the need for the investments, whether management acted reasonably based on the information that was known or ought to have been known and a detailed assessment of individual costs that were incurred by utilities, both from the perspective of the utility and consumers. Mr. Madsen's experience includes reviewing the reasonableness of both electric utility plant and other general plant, including the reasonableness of information technology and facility costs.
- Mr. Madsen previously coordinated a rate filing for a utility for a multi-year formula-based set of rates including a proper inflation rate, productivity factor, and capital recovery mechanisms. Mr. Madsen has also provided extensive evidence on multi-year rate plans, and recently submitted detailed evidence on alternate capital recovery mechanisms, including the Totex approach used in the United Kingdom, and modified claw back mechanisms employed in other jurisdictions such as New York.
- Both Mr. Madsen and Mr. Garrett are Certified Depreciation Professionals and have testified on virtually every aspect of depreciation including the determination of proper lives for specific assets, review and development of depreciation life curves, detailed depreciation calculations, net salvage estimates, alternate recovery methods for net salvage and other issues. Mr. Madsen created an in-house depreciation model based on the application of detailed formulas set out in Bulletin 155. This model is used within Emrydia to perform depreciation studies, with one such study having been recently completed for a utility. Additionally, as part of this work, Mr. Madsen has identified errors in certain of the calculations in texts and is working with the Society of Depreciation Professionals to update the texts for those corrections. Regarding taxation, Mr. Madsen formerly held the role of Manager of Taxation in FortisAlberta, at the same time as holding other management positions, and has a detailed understanding of the intricate tax requirements in both the U.S. and Canada. Mr. Madsen has also filed extensive evidence on taxation matters in numerous rate cases, including the use of the deferred and flow-through methods for taxation and reconciliation of complex tax recovery issues which in some cases uncovered errors in utility rates amounting to tens of millions of dollars.
- In preparing this response, Emrydia has reviewed the previous record leading to Order No. U-35299 and confirms it is familiar with the issues addressed therein.
- Please see above for the evidence supporting Emrydia's detailed understanding of electric utility regulation. As further evidence, Emrydia is also in the process of creating both an in-person and online regulated utility training course focusing on both discrete areas of utility operations (i.e., depreciation, cost of capital, etc.) and providing business case based focused learning related to electric, gas and water utility regulation in the U.S. and Canada.

In this matter, Emrydia has not had the benefit of reviewing the application by Cleco Power LLC (Cleco) as Emrydia understands it has not yet been filed. In addition to the information provided

herein, Emrydia confirms it will, after the contract award, clearly and completely describe in detail its proposals, including a timeline for all deliverables as informed by the application.

The following work plan description is general in nature and reflects the ordinary approach employed by Emrydia's consultants in the execution of similar engagements. Upon receipt of the application materials from Cleco, Emrydia will employ the following method to review and evaluate the evidence:

- Perform a high-level review of all application materials to identify those documents that are most critical for a detailed review.
- Perform a detailed review of certain documents from the application and prepare notes based on that review for follow up in the interrogatory process and future process steps.
- Conduct analytics on the application to identify and isolate the key drivers for cost increases and variances within the areas of focus for Emrydia.
- All applied for amounts will also be analyzed based on best industry practices to identify where costs may require further evidence to support the applied for amounts or where other approaches could be taken to optimize the incurred costs.

Following the above work, Emrydia will prepare information requests to the applicant, complete and prepare detailed direct testimony on all issues outlined in the detailed cost and price proposal, respond to information requests, and prepare rebuttal and surrebuttal testimony as necessary. The prepared testimony will include all necessary analytical support and any other evidence needed to support the conclusions and recommendations contained therein.

Emrydia also confirms that Mr. Madsen and Mr. Garrett will submit to cross-examination at an evidentiary hearing before the Commission, assist with post-hearing transcript analysis and corrections, and attend all necessary hearings, meetings and conferences as required by the PSC or as otherwise directed.

Emrydia notes that the estimated timeline proposed by the PSC is approximately 12 months for the rate request and 6 months for each annual review. The timeline for Emrydia's work will directly coincide with any approved schedule as set out by the PSC. Emrydia confirms that it will deliver all required documents within the timelines established by the PSC both internally and externally, and that Emrydia can meet any reasonable timelines within the next 12 months as well as beyond for the annual reviews.

Detailed cost and price proposal

Emrydia strives to employ senior resources to provide its clients with the best possible advice and expertise. Emrydia’s senior consultants are supported by several junior and intermediate resources, as well as administrative resources. Emrydia has a practice of not charging for junior resource time or the time of administrative staff.

Emrydia’s consulting rates as set out below include overheads to cover the costs of administrative and junior staff and other resources relied upon by Emrydia in the performance of its work. For clarity, only time worked by either Mr. Madsen or Mr. Garrett will be charged to the PSC. Where Emrydia determines that an intermediate level resource may be required (i.e., a designated resource with more than 7 years of relevant experience) and that cost savings can be achieved by having that work cost effectively completed by that resource, Emrydia will retain those resources only after discussion with the PSC. Emrydia confirms that the costs forecast below contemplate all resources Emrydia forecasts to employ in this matter.

Emrydia will work directly with the PSC to ensure that the budget is met. Emrydia prides itself on providing cost-effective but high value services to its clients.

The following schedule summarizes the hourly rates and hours of Emrydia’s experts. Both Mr. Madsen and Mr. Garrett recover at an hourly rate of \$250.00:

Table 1 – Summary of hourly rates, hours, and expenses

Name	Billing Rate	Hours	Expenses	Total
Dustin Madsen	\$250.00	363.00	\$ 1,895.00	\$ 92,645.00
David Garrett	\$250.00	283.25	\$ 1,895.00	\$ 72,707.50
Total	\$250.00	646.25	\$ 3,790.00	\$ 165,352.50

In accordance with the above schedule, Emrydia commits as full compensation for all authorized work performed and accepted including all costs, fees and expenses, an amount not to exceed \$165,352.50.

The following schedule provides a detailed breakdown of the estimated effort to complete the forecast work by area:

Table 2 – Detailed breakdown hours by activity

		Emrydia Consulting Corporation Dustin Madsen and David Garrett				
Activity	Description	Revenue requirement matters	Cost of service issues	Depreciation and rate base	Capital structure, cost of equity and overall return	Total
1	Review and analyze all filing material and related documents in this proceeding	70.0	15.0	30.0	30.0	145.0
1	Prepare issue analysis	10.0	2.5	7.5	5.0	25.0
1	Draft and respond to discovery and review discovery responses	17.5	5.0	5.0	10.0	37.5
1	Prepare direct testimony, related exhibits and schedules	75.0	10.0	30.0	40.0	155.0
1	Prepare reply and surrebuttal testimony	25.0	5.0	10.0	10.0	50.0
1	Prepare pleadings motions and other documents	10.0	2.5	10.0	10.0	32.5
1	Attend conferences and meetings	15.0	2.5	15.0	10.0	42.5
1	Witness Preparation including opening statements	7.5	2.5	5.0	2.5	17.5
1	Preparation of draft cross-examination	7.5	2.5	7.5	5.0	22.5
1	Contingency @ 10%	23.8	4.8	12.0	12.3	52.8
1	Total Hours	261.3	52.3	132.0	134.8	580.3
1	Rate	\$250	\$250	\$250	\$250	\$250
1	Total Amount	\$65,312.50	\$13,062.50	\$33,000.00	\$33,687.50	\$145,062.50
2	Attendance at hearing/reading transcripts	25	5	5	5	40
2	Witness Panel Oral Evidence	12.5	2.5	2.5	2.5	20
2	Contingency @ 10%	3.75	0.75	0.75	0.75	6
2	Total Hours	41.25	8.25	8.25	8.25	66
2	Rate	\$250	\$250	\$250	\$250	\$250
2	Total Amount	\$10,312.50	\$2,062.50	\$2,062.50	\$2,062.50	\$16,500.00
Total Hours for Activites 1-2		302.5	60.5	140.3	143.0	646.3
Total of Activites 1-2		\$75,625.00	\$15,125.00	\$35,062.50	\$35,750.00	\$161,562.50
Flights						\$1,400.00
Meals						\$690.00
Hotels						\$1,700.00
Disbursements						\$3,790.00
Total Estimated Budget		\$75,625.00	\$15,125.00	\$35,062.50	\$35,750.00	\$165,352.50

Emrydia notes that the annual reviews are not confirmed. While not specifically forecast in the above schedule, Emrydia considers sufficient time is committed in the above contingency to permit the need to address the required annual reviews on an uncontested basis.

Further, as listed above, Emrydia estimates its expenses, including reasonable travel, accommodation, and meal expenses to be approximately \$3,790.00. This is an estimate based on the costs Emrydia ordinarily incurs for similar engagements. Emrydia has a policy to ensure all travel costs are as low as possible by booking all travel well in advance, booking flights at the lowest cost, and booking reasonable hotel rooms. Emrydia’s consultants will also only travel if directed to do so by the PSC. Meal costs are ordinarily recovered on a per diem basis based on reasonable industry standards applicable in the jurisdiction Emrydia works in. Notwithstanding

the above, Emrydia is willing to work with and comply with any standards respecting the reimbursement of actual costs for travel and accommodation that the PSC itself complies with.

Disclosure of conflicts of interest

Emrydia confirms that none of its employees or consultants have any direct or indirect potential conflicts of interest on the proposed work. None of Emrydia's employees or consultants have worked for or have relationships with Cleco or its subsidiaries and affiliates. None of Emrydia's employees or consultants have worked for or have any relationships with the companies under the jurisdiction of the Louisiana Public Service Commission, or any parent, subsidiary, or affiliate of such companies.

Where a potential conflict of interest does arise in the future, which is not anticipated, Emrydia will immediately inform the PSC of the nature of any such conflict of interest. A critical element of Emrydia's business is integrity and the PSC can expect Emrydia and its consultants and staff to operate with the highest level of integrity.

Employer identification information

Emrydia Consulting Corporation's Employer Identification Number registered with the Department of the Treasury Internal Revenue Service is EIN 37-2036079.

Confirmation of RFP terms

Emrydia confirms that it has reviewed, agrees to, and takes no issue with the provisions set out in the RFP including all provisions listed therein. Emrydia acknowledges that it is not in receipt of any amendment or addendum to this RFP.

Confidentiality

Emrydia agrees to employ all reasonable efforts to ensure that confidential and proprietary information, both oral and written, remains confidential. In the execution of its work, Emrydia generally assumes all information provided to Emrydia is confidential in nature (unless that information is clearly publicly available) and will employ the necessary controls to ensure this information is not disseminated.

For greater certainty, Emrydia confirms that its employees and consultants will comply with all requirements outlined in the Request for Proposal pertaining to maintaining the confidentiality of information.

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Finally, to the extent a confidential undertaking is required to be signed by Emrydia's employees or consultants, those employees and consultants will further commit to ensuring all such obligations contained therein are abided by throughout the performance of services by Emrydia.

If you have any questions regarding the content of this proposal, please do not hesitate to contact Dustin Madsen at dustin@emrydia.com or by phone at (725) 500-0255.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dustin Madsen", with a large, stylized flourish above the name.

Dustin Madsen CPA, CA, CPA (IL, USA), CDP, CRRA
President of Emrydia Consulting Corporation

Attachments – Copies of CVs

WORK EXPERIENCE

Consultant, Regulatory and Financial Reporting

December 2011 - Present

Summary of Work for Various Clients

Calgary, Alberta

- Preparation of expert testimony in a wide variety of areas including cost-of-service, revenue requirement, income tax, valuation, depreciation, and cost of capital.
- Hands on experience in the strategic planning, development and coordination of all elements of regulatory proceedings, including preparation of interrogatories, evidence, responding to information requests, oral testimony, and preparation of written argument and reply argument.
- Recognized expertise and detailed knowledge of financial reporting and treasury processes, utility income tax principles, and International Financial Reporting Standards (“IFRS”), including a significant amount of online and face-to-face teaching experience.

Accounting, Finance, Tax and Regulatory Consultant

January 2016 – Present

Emrydia Consulting (owner)/MCPC (owner)

Calgary, Alberta

- Preparation of evidence and expert testimony both written and oral on a variety of areas, including cost-of-service, revenue requirement, income tax, valuation, depreciation, and cost of capital. Some examples of oral testimony include:
 - Witness in the New Brunswick Power 2020-21 GRA on all revenue requirement matters and retained in the New Brunswick 2023-24 GRA.
 - Prepared a depreciation study, cost-of-service study and asset valuation for a utility client in Alberta.
 - Filed expert evidence in the Northwest Territories Power Corporation 2022-23 GRA on operating costs, capitalization and depreciation matters.
 - Filed expert evidence in the ATCO Electric 2020-2022 and 2023-2025 GTAs on a variety of matters.
 - Filed expert evidence in the AltaLink 2022-2023 GTA on a variety of matters.
 - Witness in AltaLink’s 2019-2021 GTA on matters related to AltaLink’s proposed change in salvage collection methodology, the reasonableness of AltaLink’s applied for salvage costs, and line clearance mitigation expenditures.
 - Witness in the AESO’s Capacity Market Application on various matters pertaining to the AESO’s application.
 - Witness in Alberta PowerLine Fort McMurray West 500 kV Project, on matters pertaining to AESO compliance with legislative requirements, and cost concerns related to routing and the competitive procurement process.
 - Witness in ATCO Electric Transmission’s 2018-2019 GTA on matters related to deferral and reserve accounts, fixed and variable compensation, operating costs, head office costs, allocated costs, depreciation matters, and other various areas.
 - Witness in the 2018 Generic Cost of Capital (“GCOC”) Proceeding on matters relating to generic income tax methods and the recommended capital structure.
 - Witness in ATCO Electric Transmission’s 2015-2017 General Tariff Application (“GTA”), on matters relating to regulatory accounts, forecasting accuracy, approach to budgeting, operating costs, income taxes and other financial matters.

DUSTIN MADSEN CA, CPA, CPA (IL, USA), CDP, CRRA

Tel: 403-869-9294 E-mail: dustin@emrydia.com

- Prepared a comprehensive cost-of-service study for an Alberta based distribution facility owner.
- Prepared a comprehensive business and succession plan for an Alberta based distribution facility owner.
- Completed a business valuation, including a calculation of the fair market value and replacement cost new less depreciation value of the assets of an Alberta based distribution facility owner.
- Provided advice to various parties in Alberta's regulated and unregulated utility industry on numerous matters including cost-of-service rate design, business issues, hedging, regulated rate option calculation, and other specific matters.

Business Valuation and Accounting/Regulatory Risk Consultant Nov 2015 – January 2016 Berkshire Hathaway Energy Canada Calgary, Alberta

- Advise senior management at Berkshire Hathaway Energy Canada on potential acquisition risks and rewards.
- Evaluate all financial, treasury, regulatory, operational and legal elements of potential acquisitions and coordinate with other senior team members to develop a go/no-go proposal for each potential acquisition.
- Construct and maintain a business valuation model to support calculations of the enterprise value, including development of assumptions around levered/unlevered discount rates, cash flows, terminal values and certain tax assumptions depending upon the ultimate structure of the transaction.

Regulatory Specialist (Consultant) November 2012 – July 2015 AltaLink L.P. Calgary, Alberta

- Drafted or coordinated the drafting of AltaLink's 2012/2013 Deferral Account Application and 2015/2016 GTA, including responses to information requests, updates to the applications and other matters as required.
- Assisted AltaLink, working in conjunction with other Alberta utilities, in the drafting of the 2013 GCOC R&V application and the Utility Asset Disposition (UAD) Appeal. This work included detailed research and analysis into GCOC and UAD matters.
- Actively engaged in the AUC proceeding to assess the AltaLink sale, including responses to information requests and responding to due diligence questions from the sale itself.
- Prepared AltaLink's 2011, 2012, 2013 and 2014 Reports on Operations and Finances in compliance with AUC Rule 005.
- Assisted in the coordination of the 2013/2014 GTA oral hearing, including undertakings, preparation of cross-examination questions and monitoring of oral testimony.
- Prepared the public and confidential rebuttal evidence, responses to additional information requests, and argument/reply argument for the 2013/2014 GTA.
- Acted as AltaLink's lead representative on a variety of key applications filed by other Alberta Utilities, including PBR applications, GCOC, capital tracker applications, GTAs, Deferral Account Applications, and also the AESO's Tariff Application.
- Automated the majority of the Report on Operations model and improved the documentation related to the process, thereby reducing the time required to update the Report on Operations to a matter of a couple weeks rather than a couple months.
- Automated and refined the Hearing Cost and Legal Cost process, including filing of costs with the AUC, reconciliation of costs for accounting purposes, and installation of an improved internal information system for gathering and reporting.
- Continued monitoring of other proceedings and performed all other duties as required by

DUSTIN MADSEN CA, CPA, CPA (IL, USA), CDP, CRRA

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the Vice President, Regulatory Rates and Tariffs.

Manager, Financial Reporting (Contract)

April 2012 – October 2012

AltaLink L.P.

Calgary, Alberta

- Managed the Financial Reporting group, and performed all duties as required of the Manager, Financial Reporting and any other duties as required.
- Coordinated the implementation of BPC to assist with the consolidation of financial results in SAP.
- Provided technical IFRS input for a variety of projects and Canadian Electricity Association matters.

Consultant, Corporate Finance and Tax

February 2012 – April 2012

Enerflex Ltd.

Calgary, Alberta

- Assisted with pre-implementation planning for IFRS 9 through 13.
- Reviewed the hedging policy in place at Enerflex to assess ongoing effectiveness and provided feedback on a new treasury management system.
- Reviewed annual financial statements, Management's Discussion and Analysis and the AIF, and provided feedback for changes and improvements to the first quarter financial statements.
- Performed a review of existing accounting policies including embedded derivative review of major contracts, lessee and lessor accounting, segmented reporting, borrowing costs, stock options and more.

Manager, Forecasts and Budgets

January 2010 – November 2011

IFRS Project Manager/Sponsor

February 2007 – December 2010

Senior Financial Accountant, Financial Reporting

February 2007 – March 2010

FortisAlberta Inc.

Calgary, Alberta

- Prepared/reviewed monthly, quarterly and annual forecasts and all associated financial analysis for the CFO in comparison to actuals.
- Review of regulatory filings and annual regulatory financial statements submitted to the Alberta Utilities Commission.
- Preparation/review of annual Business Plan for approval by Board of Directors.
- Improvement of monthly and daily treasury forecasts and involvement in debt issuances and responses to due diligence requests.
- Management and review of the monthly tax calculation and development of various tax planning strategies from both a regulatory and financial reporting perspective.
- Assisted in the review of all corporate tax processes and calculation of tax provisions, as well as, design of complex tax planning strategies.
- Responsible for the planning and oversight of the conversion to International Financial Reporting Standards including the review of all policy papers, issues lists, system conversion issues etc.
- Responsible for financial reporting, including the preparation and review of financial statements in accordance with Canadian generally accepted accounting principles, the preparation and review of the MD&A, preparation of the monthly management report, and preparation and review of accounting research and policies.
- Involved in the design, implementation and ongoing improvements of various accounting processes and internal controls within financial reporting, accounts payable, capital assets, inventory, general accounting, treasury, taxation and payroll.
- Provided IFRS transition course for all Finance staff at FortisAlberta.

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- Demonstrated effective time management, organization, supervisory and problem solving/analytical skills.

Vice Chair, CEA`s Finance and Accounting Subcommittee May 2011 – December 2011
Member May 2007 – December 2011
Canadian Electrical Association Ottawa, Ontario

- Attended all bi-annual meetings as an active participant involved in presentations at the meetings, organized special purpose conference calls, prepared response letters to both the IASB and AcSB on a variety of topics, and assisted in the special subcommittee on Rate Regulated Accounting.
- Assisted the Chair in the preparation of meeting content, arranging speakers and guest attendees, and other duties as requested.

IFRS Classroom Facilitator June 2009 – November 2011
IASeminars London, England

- Classroom facilitator for IASeminars focusing on IFRS accounting within the Utilities and Energy industries.

Experienced Module Facilitator January 2006 – September 2009
CA School of Business Calgary, Alberta

- Facilitated Modules 1 to 5 multiple times with class sizes between 8 and 20 students.

Senior Auditor September 2003 – February 2007
Deloitte and Touche LLP Saskatoon, Saskatchewan/ Calgary, Alberta

- Performed review, audit, SOX 404 and CSOX work for a variety of large multi-national clients including Petro Canada, Potash Corporation, and Superior Propane, as well as review and audit work for smaller to mid-sized for profit and not-for-profit organizations.
- Completed personal tax returns and assisted in the audit of corporate tax provisions.
- Provided audit and oil and gas accounting training to new and existing staff at Deloitte.

EDUCATION

Certified Rate of Return Analyst
Society of Utility and Regulatory Financial Analysts

Certified Depreciation Professional
Society of Depreciation Professionals

Certified Public Accountant
Illinois Board of Accountancy

Chartered Professional Accountant
Chartered Professional Accountants of Alberta

Chartered Accountant
Institute of Chartered Accountants of Alberta

Bachelor of Commerce, Major in Accounting, with Great Distinction
University of Saskatchewan

EDUCATION

University of Oklahoma Master of Business Administration Areas of Concentration: Finance, Energy	Norman, OK 2014
University of Oklahoma College of Law Juris Doctor Member, American Indian Law Review	Norman, OK 2007
University of Oklahoma Bachelor of Business Administration Major: Finance	Norman, OK 2003

PROFESSIONAL DESIGNATIONS

Society of Depreciation Professionals
Certified Depreciation Professional (CDP)

Society of Utility and Regulatory Financial Analysts
Certified Rate of Return Analyst (CRRA)

The Mediation Institute
Certified Civil / Commercial & Employment Mediator

WORK EXPERIENCE

Resolve Utility Consulting PLLC <u>Managing Member</u> Provide expert analysis and testimony specializing in depreciation and cost of capital issues for clients in utility regulatory proceedings.	Oklahoma City, OK 2016 – Present
Oklahoma Corporation Commission <u>Public Utility Regulatory Analyst</u> <u>Assistant General Counsel</u> Represented commission staff in utility regulatory proceedings and provided legal opinions to commissioners. Provided expert analysis and testimony in depreciation, cost of capital, incentive compensation, payroll and other issues.	Oklahoma City, OK 2012 – 2016 2011 – 2012

Perebus Counsel, PLLC

Oklahoma City, OK

Managing Member

2009 – 2011

Represented clients in the areas of family law, estate planning, debt negotiations, business organization, and utility regulation.

Moricoli & Schovanec, P.C.

Oklahoma City, OK

Associate Attorney

2007 – 2009

Represented clients in the areas of contracts, oil and gas, business structures and estate administration.

TEACHING EXPERIENCE

University of Oklahoma

Norman, OK

Adjunct Instructor – “Conflict Resolution”

2014 – 2021

Adjunct Instructor – “Ethics in Leadership”

Rose State College

Midwest City, OK

Adjunct Instructor – “Legal Research”

2013 – 2015

Adjunct Instructor – “Oil & Gas Law”

PUBLICATIONS

American Indian Law Review

Norman, OK

“Vine of the Dead: Reviving Equal Protection Rites for Religious Drug Use”

2006

(31 Am. Indian L. Rev. 143)

PROFESSIONAL ASSOCIATIONS

Oklahoma Bar Association

2007 – Present

Society of Depreciation Professionals

2014 – Present

Board Member – President

2017

Participate in management of operations, attend meetings, review performance, organize presentation agenda.

Society of Utility Regulatory Financial Analysts

2014 – Present