

James F. Wilson
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SUMMARY

James F. Wilson is an economist with over 40 years of consulting experience, primarily in the electric power and natural gas industries. Many of his assignments have pertained to the economic and policy issues arising from the interplay of competition and regulation in these industries, including restructuring policies, market design, market analysis and market power. Other recent engagements have involved resource adequacy and capacity markets, contract litigation and damages, forecasting and market evaluation, pipeline rate cases and evaluating allegations of market manipulation. Mr. Wilson has been involved in electricity restructuring and wholesale market design for over twenty years in California, PJM, New England, Russia and other regions. He also spent five years in Russia in the early 1990s advising on the reform, restructuring and development of the Russian electricity and natural gas industries.

Mr. Wilson has submitted affidavits and testified in Federal Energy Regulatory Commission and state regulatory proceedings. His papers have appeared in the *Energy Journal*, *Electricity Journal*, *Public Utilities Fortnightly* and other publications, and he often presents at industry conferences.

Prior to founding Wilson Energy Economics, Mr. Wilson was a Principal at LECG, LLC. He has also worked for ICF Resources, Decision Focus Inc., and as an independent consultant.

EDUCATION

MS, Engineering-Economic Systems, Stanford University, 1982
BA, Mathematics, Oberlin College, 1977

RECENT ENGAGEMENTS

- Analysis of provisions to enhance resource fuel security in day-ahead and real-time wholesale electricity markets.
- Evaluated peak electric load forecasts and enhancements to load forecasting methodologies.
- Evaluated a probabilistic analysis to determine the electric generating capacity reserve margin to satisfy resource adequacy criteria.
- Evaluated the potential impact of an electricity generation operating reserve demand curve on a wholesale electricity market with a capacity construct.
- Developed wholesale capacity market enhancements to accommodate seasonal resources and resource adequacy requirements.
- Evaluation of wholesale electricity market design enhancements to accommodate state initiatives to promote state environmental and other policy objectives.
- Evaluation of proposals for natural gas distribution system expansions.
- Various consulting assignments on wholesale electric capacity market design issues in PJM, New England, the Midwest, Texas, and California.
- Cost-benefit analysis of a new natural gas pipeline.
- Evaluation of the impacts of demand response on electric generation capacity mix and emissions.

- Panelist on a FERC technical conference on capacity markets.
- Affidavit on the potential for market power over natural gas storage.
- Executive briefing on wind integration and linkages to short-term and longer-term resource adequacy approaches.
- Affidavit on the impact of a centralized capacity market on the potential benefits of participation in a Regional Transmission Organization (RTO).
- Participated in a panel teleseminar on resource adequacy policy and modeling.
- Affidavit on opt-out rules for centralized capacity markets.
- Affidavits on minimum offer price rules for RTO centralized capacity markets.
- Evaluated electric utility avoided cost in a tax dispute.
- Advised on pricing approaches for RTO backstop short-term capacity procurement.
- Affidavit evaluating the potential impact on reliability of demand response products limited in the number or duration of calls.
- Evaluated changing patterns of natural gas production and pipeline flows, developed approaches for pipeline tolls and cost recovery.
- Evaluated an electricity peak load forecasting methodology and forecast; evaluated regional transmission needs for resource adequacy.
- Participated on a panel teleseminar on natural gas price forecasting.
- Affidavit evaluating a shortage pricing mechanism and recommending changes.
- Testimony in support of proposed changes to a forward capacity market mechanism.
- Reviewed and critiqued an analysis of the economic impacts of restrictions on oil and gas development.
- Advised on the development of metrics for evaluating the performance of Regional Transmission Organizations and their markets.
- Prepared affidavit on the efficiency benefits of excess capacity sales in readjustment auctions for installed capacity.
- Prepared affidavit on the potential impacts of long lead time and multiple uncertainties on clearing prices in an auction for standard offer electric generation service.

EARLIER PROFESSIONAL EXPERIENCE

LECG, LLC, Washington, DC 1998–2009.

Principal

- Reviewed and commented on an analysis of the target installed capacity reserve margin for the Mid Atlantic region; recommended improvements to the analysis and assumptions.
- Evaluated an electric generating capacity mechanism and the price levels to support adequate capacity; recommended changes to improve efficiency.
- Analyzed and critiqued the methodology and assumptions used in preparation of a long run electricity peak load forecast.
- Evaluated results of an electric generating capacity incentive mechanism and critiqued the mechanism's design; prepared a detailed report. Evaluated the impacts of the mechanism's flaws on prices and costs and prepared testimony in support of a formal complaint.
- Analyzed impacts and potential damages of natural gas migration from a storage field.
- Evaluated allegations of manipulation of natural gas prices and assessed the potential impacts of natural gas trading strategies.
- Prepared affidavit evaluating a pipeline's application for market-based rates for interruptible transportation and the potential for market power.
- Prepared testimony on natural gas industry contracting practices and damages in a contract dispute.
- Prepared affidavits on design issues for an electric generating capacity mechanism for an eastern US regional transmission organization; participated in extensive settlement discussions.

- Prepared testimony on the appropriateness of zonal rates for a natural gas pipeline.
- Evaluated market power issues raised by a possible gas-electric merger.
- Prepared testimony on whether rates for a pipeline extension should be rolled-in or incremental under Federal Energy Regulatory Commission (“FERC”) policy.
- Prepared an expert report on damages in a natural gas contract dispute.
- Prepared testimony regarding the incentive impacts of a ratemaking method for natural gas pipelines.
- Prepared testimony evaluating natural gas procurement incentive mechanisms.
- Analyzed the need for and value of additional natural gas storage in the southwestern US.
- Evaluated market issues in the restructured Russian electric power market, including the need to introduce financial transmission rights, and policies for evaluating mergers.
- Affidavit on market conditions in western US natural gas markets and the potential for a new merchant gas storage facility to exercise market power.
- Testimony on the advantages of a system of firm, tradable natural gas transmission and storage rights, and the performance of a market structure based on such policies.
- Testimony on the potential benefits of new independent natural gas storage and policies for providing transmission access to storage users.
- Testimony on the causes of California natural gas price increases during 2000-2001 and the possible exercise of market power to raise natural gas prices at the California border.
- Advised a major US utility with regard to the Federal Energy Regulatory Commission’s proposed Standard Market Design and its potential impacts on the company.
- Reviewed and critiqued draft legislation and detailed market rules for reforming the Russian electricity industry, for a major investor in the sector.
- Analyzed the causes of high prices in California wholesale electric markets during 2000 and developed recommendations, including alternatives for price mitigation. Testimony on price mitigation measures.
- Summarized and critiqued wholesale and retail restructuring and competition policies for electric power and natural gas in select US states, for a Pacific Rim government contemplating energy reforms.
- Presented testimony regarding divestiture of hydroelectric generation assets, potential market power issues, and mitigation approaches to the California Public Utilities Commission.
- Reviewed the reasonableness of an electric utility’s wholesale power purchases and sales in a restructured power market during a period of high prices.
- Presented an expert report on failure to perform and liquidated damages in a natural gas contract dispute.
- Presented a workshop on Market Monitoring to a group of electric utilities in the process of forming an RTO.
- Authored a report on the screening approaches used by market monitors for assessing exercise of market power, material impacts of conduct, and workable competition.
- Developed recommendations for mitigating locational market power, as part of a package of congestion management reforms.
- Provided analysis in support of a transmission owner involved in a contract dispute with generators providing services related to local grid reliability.
- Authored a report on the role of regional transmission organizations in market monitoring.
- Prepared market power analyses in support of electric generators’ applications to FERC for market-based rates for energy and ancillary services.
- Analyzed western electricity markets and the potential market power of a large producer under various asset acquisition or divestiture strategies.
- Testified before a state commission regarding the potential benefits of retail electric competition and issues that must be addressed to implement it.

- Prepared a market power analysis in support of an acquisition of generating capacity in the New England market.
- Advised a California utility regarding reform strategies for the California natural gas industry, addressing market power issues and policy options for providing system balancing services.

ICF RESOURCES, INC., Fairfax, VA, 1997–1998.

Project Manager

- Reviewed, critiqued and submitted testimony on a New Jersey electric utility's restructuring proposal, as part of a management audit for the state regulatory commission.
- Assisted a group of US utilities in developing a proposal to form a regional Independent System Operator (ISO).
- Researched and reported on the emergence of Independent System Operators and their role in reliability, for the Department of Energy.
- Provided analytical support to the Secretary of Energy's Task Force on Electric System Reliability on various topics, including ISOs. Wrote white papers on the potential role of markets in ensuring reliability.
- Recommended near-term strategies for addressing the potential stranded costs of non-utility generator contracts for an eastern utility; analyzed and evaluated the potential benefits of various contract modifications, including buyout and buydown options; designed a reverse auction approach to stimulating competition in the renegotiation process.
- Designed an auction process for divestiture of a Northeastern electric utility's generation assets and entitlements (power purchase agreements).
- Participated in several projects involving analysis of regional power markets and valuation of existing or proposed generation assets.

IRIS MARKET ENVIRONMENT PROJECT, 1994–1996.

Project Director, Moscow, Russia

Established and led a policy analysis group advising the Russian Federal Energy Commission and Ministry of Economy on economic policies for the electric power, natural gas, oil pipeline, telecommunications, and rail transport industries (*the Program on Natural Monopolies*, a project of the IRIS Center of the University of Maryland Department of Economics, funded by USAID):

- Advised on industry reforms and the establishment of federal regulatory institutions.
- Advised the Russian Federal Energy Commission on electricity restructuring, development of a competitive wholesale market for electric power, tariff improvements, and other issues of electric power and natural gas industry reform.
- Developed policy conditions for the IMF's \$10 billion Extended Funding Facility.
- Performed industry diagnostic analyses with detailed policy recommendations for electric power (1994), natural gas, rail transport and telecommunications (1995), oil transport (1996).

Independent Consultant stationed in Moscow, Russia, 1991–1996

Projects for the WORLD BANK, 1992-1996:

- Bank Strategy for the Russian Electricity Sector. Developed a policy paper outlining current industry problems and necessary policies, and recommending World Bank strategy.
- Russian Electric Power Industry Restructuring. Participated in work to develop recommendations to the Russian Government on electric power industry restructuring.
- Russian Electric Power Sector Update. Led project to review developments in sector restructuring, regulation, demand, supply, tariffs, and investment.
- Russian Coal Industry Restructuring. Analyzed Russian and export coal markets and developed forecasts of future demand for Russian coal.
- World Bank/IEA Electricity Options Study for the G-7. Analyzed mid- and long-term electric power demand and efficiency prospects and developed forecasts.

- Russian Energy Pricing and Taxation. Developed recommendations for liberalizing energy markets, eliminating subsidies and restructuring tariffs for all energy resources.

Other consulting assignments in Russia, 1991–1994:

- Advised on projects pertaining to Russian energy policy and the transition to a market economy in the energy industries, for the Institute for Energy Research of the Russian Academy of Sciences.
- Presented seminars on the structure, economics, planning, and regulation of the energy and electric power industries in the US, for various Russian clients.

DECISION FOCUS INC., Mountain View, CA, 1983–1992

Senior Associate, 1985-1992.

- For the Electric Power Research Institute, led projects to develop decision-analytic methodologies and models for evaluating long term fuel and electric power contracting and procurement strategies. Applied the methodologies and models in numerous case studies, and presented several workshops and training sessions on the approaches.
- Analyzed long-term and short-term natural gas supply decisions for a large California gas distribution company following gas industry unbundling and restructuring.
- Analyzed long term coal and rail alternatives for a midwest electric utility.
- Evaluated bulk power purchase alternatives and strategies for a New Jersey electric utility.
- Performed a financial and economic analysis of a proposed hydroelectric project.
- For a natural gas pipeline company serving the Northeastern US, forecasted long-term natural gas supply and transportation volumes. Developed a forecasting system for staff use.
- Analyzed potential benefits of diversification of suppliers for a natural gas pipeline company.
- Evaluated uranium contracting strategies for an electric utility.
- Analyzed telecommunications services markets under deregulation, developed and implemented a pricing strategy model. Evaluated potential responses of residential and business customers to changes in the client's and competitors' telecommunications services and prices.
- Analyzed coal contract terms and supplier diversification strategies for an eastern electric utility.
- Analyzed oil and natural gas contracting strategies for an electric utility.

TESTIMONY AND AFFIDAVITS

PJM Interconnection, L.L.C., FERC Docket No. ER24-98 (Market Seller Offer Cap), Affidavit in Support of the Protest of the Public Interest Organizations, November 9, 2023; Supplemental Affidavit, December 22, 2023.

PJM Interconnection, L.L.C., FERC Docket No. ER24-99 (Resource Adequacy), Affidavit in Support of the Protest of the Public Interest Entities, November 9, 2023.

Midcontinent Independent System Operator, Inc.'s Reliability Based Demand Curve, FERC Docket No. ER23-2977, Affidavit in Support of the Comments of Public Interest Organizations, November 3, 2023; Supplemental Affidavit in Support of the Comments and Reply of Public Interest Organizations, January 11, 2024.

In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan, Public Utilities Commission of Ohio Case No. 23-301-EL-SSO, Direct Testimony on behalf of the Office of the Ohio Consumers' Counsel, October 23, 2023; testimony at hearings, November 29, 2023.

In the Matter of the Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2024 Energy Resource Recovery Account, California Public Utilities Commission Application 23-05-012, Direct Testimony on behalf of Small Business Utility Advocates, September 6, 2023.

Virginia Electric and Power Company's 2023 Integrated Resource Plan filing, Virginia State Corporation Commission Case No. PUR-2023-00066, Direct Testimony on behalf of Appalachian Voices, August 8, 2023; testimony at hearings, September 19, 2023.

In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer in the Form of an Electric Security Plan, Public Utilities Commission of Ohio Case No. 23-23-EL-SSO, Direct Testimony on Behalf of the Office of the Ohio Consumers' Counsel, June 9, 2023; Testimony Recommending Modification of the Stipulation, September 20, 2023; testimony at hearings, October 11, 2023.

Essential Power OPP, LLC, et al. v. PJM Interconnection, L.L.C, FERC Docket No. EL23-53 (Winter Storm Elliott complaint cases), Affidavit in Support of the Comments of Sierra Club, May 26, 2023.

PJM Interconnection, L.L.C., FERC Docket No. ER23-1609 (RPM auction delay), Affidavit in Support of the Comments of Sierra Club, May 2, 2023.

In the Matter of the Application of The Dayton Power and Light Company d/b/a AES Ohio for Approval of Its Electric Security Plan, Public Utilities Commission of Ohio Case No. 22-900-EL-SSO, Direct Testimony on Behalf of the Office of the Ohio Consumers' Counsel, April 21, 2023; deposition, April 26, 2023; testimony at hearings May 3, 2023.

PJM Interconnection, L.L.C., FERC Docket No. ER22-2984 (RPM Quadrennial Review), Affidavit in Support of the Comments of the Public Interest Entities, October 21, 2022; Reply Affidavit in Support of the Reply Comments of the Public Interest Entities, November 4, 2022.

In the Matter of the Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2023 Energy Resource Recovery Account, California Public Utilities Commission Application 22-05-029, Direct Testimony on behalf of Small Business Utility Advocates, September 7, 2022.

In the Matter of the Application of DTE Electric Company for Approval to Implement a Power Supply Cost Recovery Plan for the 12 months ending December 31, 2022, Michigan Public Service Commission Case No. U-21050, Direct Testimony on behalf of Michigan Environmental Council, August 3, 2022.

In Re: Washington Utilities and Transportation Commission v. Avista Corporation d/b/a Avista Utilities; In the Matter of the Electric Service Reliability Reporting Plan of Avista Corporation d/b/a Avista Utilities; Dockets UE-220053, UG-220054, and UE-210854 (Consolidated), Joint Testimony in Support of the Full Multiparty Settlement on behalf of Small Business Utility Advocates, July 8, 2022; Supplemental Joint Testimony in Support of the Colstrip Tracker and Schedule 99, July 29, 2022; Testimony at hearings September 21, 2022.

In Re: Georgia Power Company's 2022 Integrated Resource Plan and 2022 Application for the Certification, Decertification, and Amended Demand- Side Management Plan; Georgia Public Service Commission Docket Nos. 44160 and 44161; Direct Testimony on behalf of Georgia Interfaith Power & Light and the Partnership For Southern Equity, May 6, 2022; testimony at hearings May 26, 2022.

Clean Air Council et al. v. Pennsylvania Department of Environmental Protection, Environmental Hearing Board Docket No. 2021-055, *Review and Evaluation of the Need for and Alternatives to the Proposed Renovo Energy Center Power Plant*, report prepared on behalf of Clean Air Council, Citizens for Pennsylvania's Future, and the Center for Biological Diversity, filed March 30, 2022; additional affidavit, June 29, 2022.

Appalachian Power Company and Wheeling Power Company, Petition for Commission Consent and Approval to Enter into Ownership and Operating Agreements for the Mitchell Plant, Public Service Commission of West Virginia Case No. 21-0810-E-PC, Direct Testimony on Behalf of West Virginia Citizen Action Group, Solar United Neighbors, and Energy Efficient West Virginia, March 28, 2022.

In the Matter of the Application of DTE Electric Company for Reconciliation of its Power Supply Cost Recovery Plan for the 12-month Period Ending December 31, 2020, Michigan Public Service Commission Case No. U-20528, Direct Testimony on behalf of Michigan Environmental Council, November 23, 2021.

In the Matter of the Application of San Diego Gas & Electric Company for Approval of its 2022 Electric Sales Forecast, California Public Utilities Commission Application 21-08-010, Direct Testimony on behalf of Small Business Utility Advocates, October 1, 2021.

In the Matter of the Nova Scotia Power Inc. 2021 Load Forecast Report, Nova Scotia Utility and Review Board Matter No. M10109, Evidence on behalf of the Nova Scotia Consumer Advocate, July 21, 2021.

In the Matter of the Application of DTE Electric Company for Approval to Implement a Power Supply Cost Recovery Plan for the 12 months ending December 31, 2021, Michigan Public Service Commission Case No. U-20826, Direct Testimony on behalf of Michigan Environmental Council, June 6, 2021; Surrebuttal Testimony September 8, 2021.

Independent Market Monitor for PJM v. PJM Interconnection, LLC, FERC Docket No. EL19-47-000, and Office of the People's Counsel for District of Columbia et al v. PJM Interconnection, LLC, FERC Docket No. Docket No. EL19-63-000, Affidavit in Support of the Reply Brief of the Joint Consumer Advocates, June 9, 2021.

In Re: Application for the issuance of a certificate of public convenience and necessity for the internal modifications at coal fired generating plants necessary to comply with federal environmental regulations, Appalachian Power Company and Wheeling Power Company, Public Service Commission of West Virginia Case No. 20-1040-E-CN, Direct Testimony on behalf of West Virginia Citizens Action Group, Solar United Neighbors, and Energy Efficient West Virginia, Direct Testimony May 6, 2021; Rebuttal Testimony May 20, 2021; testimony at hearings June 9, 2021; Supplemental Direct Testimony September 24, 2021; testimony at additional hearings September 24, 2021.

In the Matter of the 2020 Biennial Integrated Resource Plans and Related 2020 REPS Compliance Plans of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, *Review and Evaluation of the 2020 Resource Adequacy Studies Relied Upon for the Duke Energy Carolinas and Duke Energy Progress 2020 Integrated Resource Plans*, Attachment 5 to the Partial Initial Comments of Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council, North Carolina Utilities Commission Docket No. E-100 Sub 165, March 1, 2021.

In the Matter of South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, South Carolina Public Service Commission Docket Nos. 2019-224-E and 2019-225-E, Direct Testimony on behalf of Natural Resources Defense Council, Southern Alliance for Clean Energy, Sierra Club, South Carolina Coastal Conservation League, and Upstate Forever, February 5, 2021; Surrebuttal Testimony April 15, 2021.

In the matter of the Application of DTE Electric Company for Reconciliation of its Power Supply Cost Recovery Plan for the 12-month Period Ending December 31, 2019, Michigan Public Service Commission Case No. U-20222, Direct Testimony on behalf of Michigan Environmental Council, October 27, 2020.

Virginia Electric and Power Company's 2020 Integrated Resource Plan filing, Virginia State Corporation Commission Case No. PUR-2020-00035, Direct Testimony on behalf of Environmental Respondent, September 15, 2020; testimony at hearings, October 27, 2020.

PJM Interconnection, L.L.C., FERC Docket Nos. ER19-1486 and EL19-58-003, Affidavit in Support of the Public Interest and Customer Organizations' Partial Protest of and Comments on PJM's Compliance Filing Regarding Energy and Ancillary Service Offset, September 2, 2020.

In the Matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedules for 2020 Metered Jurisdictional Sales of Electricity, Michigan Public Service Commission Case No. U-20527, Direct Testimony on behalf of Michigan Environmental Council, June 17, 2020.

ISO New England Inc., FERC Docket Nos. EL18-182, ER20-1567 (New England Energy Security), Prepared Testimony in Support of the Protest of the New England States Committee on Electricity, May 15, 2020.

Proceedings on Motion of the Commission to Consider Resource Adequacy Matters, New York Public Service Commission Case No. 19-E-0530, Reply Affidavit on behalf of Natural Resources Defense Council, Sustainable FERC Project, Sierra Club, New Yorkers for Clean Power, Environmental Advocates of New York, and Vote Solar, January 31, 2020.

In the Matter of the Application of DTE Electric Company for Reconciliation of its Power Supply Cost Recovery Plan for the 12-month Period Ending December 31, 2018, Michigan Public Service Commission Case No. U-20203, Direct Testimony on behalf of Michigan Environmental Council, January 17, 2020.

In Re: Joint Application of Longview Power II, LLC and Longview Renewable Power, LLC to Authorize the Construction and Operation of Two Wholesale Electric Generating Facilities and One High-Voltage Electric Transmission Line in Monongalia County, Public Service Commission of West Virginia Case No. 19-0890-E-CS-CN, Direct Testimony on behalf of Sierra Club, January 3, 2020; testimony at hearings January 30, 2019.

In Re: Alabama Power Company Petition for a Certificate of Convenience and Necessity, Alabama Public Service Commission Docket No. 32953, Direct Testimony on Behalf of Energy Alabama and Gas, December 4, 2019; testimony at hearings March 11, 2020; declaration (re COVID-19 impact) September 11, 2020.

In the Matter of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC Standard Offer, Avoided Cost Methodologies, and Form Contract Power Purchase Agreements, South Carolina Public Service Commission Docket Nos. 2019-185-E and 2019-186-E, Direct Testimony on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, September 11, 2019; surrebuttal testimony, October 11, 2019; direct and surrebuttal testimony at hearings, October 22, 2019.

In the Matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedules for 2019 Metered Jurisdictional Sales of Electricity, Michigan Public Service Commission Case No. U-20221, Direct Testimony on behalf of Michigan Environmental Council, May 28, 2019.

PJM Interconnection, L.L.C., FERC Docket Nos. EL19-58 and ER19-1486 (Reserve Pricing - ORDC), Affidavit in Support of the Protest of the Clean Energy Advocates, May 15, 2019.

PJM Interconnection, L.L.C., FERC Docket Nos. EL19-58 and ER19-1486 (Reserve Pricing - Transition), Affidavit in Support of the Protests of the PJM Load/Customer Coalition and Clean Energy Advocates, May 15, 2019.

In Re: Georgia Power Company's 2019 Integrated Resource Plan, Georgia Public Service Commission Docket No. 42310, Direct Testimony on Behalf of Georgia Interfaith Power & Light and the Partnership For Southern Equity, April 25, 2019; testimony at hearings May 14, 2019.

PJM Interconnection, L.L.C., FERC Docket No. EL19-63 (RPM Market Supplier Offer Cap), Affidavit in Support of the Complaint of the Joint Consumer Advocates, April 15, 2019.

In the Matter of 2018 Biennial Integrated Resource Plans and Related 2018 REPS Compliance Plans, North Carolina Utilities Commission Docket No. E-100 Sub 157, Review and Evaluation of the Load Forecasts, and Review and Evaluation of Resource Adequacy and Solar Capacity Value Issues, with regard to the Duke Energy Carolinas and Duke Energy Progress 2018 Integrated Resource Plans, Attachments 3 and 4 to the comments of Southern Alliance for Clean Energy, Sierra Club, and the Natural Resources Defense Council, March 7, 2019; presentation at technical conference, January 8, 2020.

In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2018, North Carolina Utilities Commission Docket No. E-100 Sub 158, Review and Evaluation of Resource Adequacy and Solar Capacity Value Issues with regard to the Duke Energy Carolinas and Duke Energy Progress 2018 Integrated Resource Plans and Avoided Cost Filing, Attachment B to the Initial Comments of the Southern Alliance for Clean Energy, February 12, 2019.

PJM Interconnection, L.L.C., FERC Docket No. ER19-105 (RPM Quadrennial Review), Affidavit in Support of the Limited Protest and Comments of the Public Interest Entities, November 19, 2018.

PJM Interconnection, L.L.C., FERC Docket No. EL18-178 (MOPR and FRR Alternative), Affidavit in Support of the Comments of the FRR-RS Supporters, October 2, 2018; Reply Affidavit on behalf of Clean Energy and Consumer Advocates, November 6, 2018.

Virginia Electric and Power Company's 2018 Integrated Resource Plan filing, Virginia State Corporation Commission Case No. PUR-2018-00065, Direct Testimony on behalf of Environmental Respondents, August 10, 2018; testimony at hearings September 25, 2018; Supplemental Testimony, April 16, 2019.

In the Matter of the Application of Duke Energy Ohio for an Increase in Electric Distribution Rates, etc., Public Utilities Commission of Ohio Case No. 17-32-EL-AIR et al, Direct Testimony on Behalf of the Office of the Ohio Consumers' Counsel, June 25, 2018; deposition, July 3, 2018; testimony at hearings, July 19, 2018.

In the Matter of the Application of DTE Gas Company for Approval of a Gas Cost Recovery Plan, 5-year Forecast and Monthly GCR Factor for the 12 Months ending March 31, 2019, Michigan Public Service Commission Case No. U-18412, Direct Testimony on behalf of Michigan Environmental Council, June 7, 2018.

Constellation Mystic Power, L.L.C., FERC Docket No. ER18-1639-000 (Mystic Cost of Service Agreement), Affidavit in Support of the Comments of New England States Committee on Electricity, June 6, 2018; prepared answering testimony, August 23, 2018.

New England Power Generators Association, Complainant v. ISO New England Inc. Respondent, FERC Docket No. EL18-154-000 (re: capacity offer price of Mystic power plant), Affidavit in Support of the Protest of New England States Committee on Electricity, June 6, 2018.

PJM Interconnection, L.L.C., FERC Docket No. ER18-1314 (Capacity repricing or MOPR-Ex), Affidavit in Support of the Protests of DC-MD-NJ Consumer Coalition, Joint Consumer Advocates, and Clean Energy Advocates, May 7, 2018; reply affidavit, June 15, 2018.

In the Matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedules for 2018 Metered Jurisdictional Sales of Electricity, Michigan Public Service Commission Case No. U-18403, Direct Testimony on behalf of Michigan Environmental Council and Sierra Club, April 20, 2018.

Virginia Electric and Power Company's 2017 Integrated Resource Plan filing, Virginia State Corporation Commission Case No. PUR-2017-00051, Direct Testimony on behalf of Environmental Respondents, August 11, 2017; testimony at hearings September 26, 2017.

Ohio House of Representatives Public Utilities Committee hearing on House Bill 178 (Zero Emission Nuclear Resource legislation), Opponent Testimony on Behalf of Natural Resources Defense Council, May 15, 2017.

In the Matter of the Application of Atlantic Coast Pipeline, Federal Energy Regulatory Commission Docket No. CP15-554, Evaluating Market Need for the Atlantic Coast Pipeline, Attachment 2 to the comments of Shenandoah Valley Network *et al*, April 6, 2017.

In the Matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedules for 2017 Metered Jurisdictional Sales of Electricity, Michigan Public Service Commission Case No. U-18143, Direct Testimony on behalf of Michigan Environmental Council and Sierra Club, March 22, 2017.

In the Matter of the Petition of Washington Gas Light Company for Approval of Revised Tariff Provisions to Facilitate Access to Natural Gas in the Company's Maryland Franchise Area That Are Currently Without Natural Gas Service, Maryland Public Service Commission Case No. 9433, Direct Testimony on Behalf of the Mid-Atlantic Propane Gas Association and the Mid-Atlantic Petroleum Distributors Association, Inc., March 1, 2017; testimony at hearings, May 1, 2017.

In the Matter of Integrated Resource Plans and Related 2016 REPS Compliance Plans, North Carolina Utilities Commission Docket No. E-100 Sub 147, Review and Evaluation of the Peak Load Forecasts and Reserve Margin Determinations for the Duke Energy Carolinas and Duke Energy Progress 2016 Integrated Resource Plans, Attachments A and B to the comments of the Natural Resources Defense Council, Southern Alliance for Clean Energy, and the Sierra Club, February 17, 2017.

In the Matter of the Tariff Revisions Designated TA285-4 filed by ENSTAR Natural Gas Company, a Division of SEMCO Energy, Inc., Regulatory Commission of Alaska Case No. U-16-066, Testimony on Behalf of Matanuska Electric Association, Inc., February 7, 2017, testimony at hearings, June 21, 2017.

PJM Interconnection, L.L.C., FERC Docket No. ER17-367 (seasonal capacity), Prepared Testimony on Behalf of Advanced Energy Management Alliance, Environmental Law & Policy Center, Natural Resources Defense Council, Rockland Electric Company and Sierra Club, December 8, 2016; Declaration in support of Protest of Response to Deficiency Letter, February 13, 2017.

Natural Resources Defense Council, Sierra Club, and Union of Concerned Scientists v. Federal Energy Regulatory Commission, U.S. District Court of Appeals for the D.C. Circuit Case No. 16-1236 (Capacity Performance), Declaration, September 23, 2016.

Mountaineer Gas Company Infrastructure Replacement and Expansion Program Filing for 2016, West Virginia Public Service Commission Case No. 15-1256-G-390P, and Mountaineer Gas Company Infrastructure Replacement and Expansion Program Filing for 2017, West Virginia Public Service Commission Case No. 16-0922-G-390P, Direct Testimony on behalf of the West Virginia Propane Gas Association, September 9, 2016.

Application of Chesapeake Utilities Corporation for a General Increase in its Natural Gas Rates and for Approval of Certain Other Changes to its Natural Gas Tariff, Delaware P.S.C. Docket No. 15-1734, Direct Testimony on behalf of the Delaware Association Of Alternative Energy Providers, Inc., August 24, 2016.

Virginia Electric and Power Company's 2016 Integrated Resource Plan filing, Virginia State Corporation Commission Case No. PUE-2016-00049, Direct Testimony on behalf of Environmental Respondents, August 17, 2016; testimony at hearings October 5, 2016.

In the Matter of the Application of DTE Electric Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedules for 2016 Metered Jurisdictional Sales of Electricity, Michigan Public Service Commission Case No. U-17920, Direct Testimony on behalf of Michigan Environmental Council and Sierra Club, March 14, 2016.

In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider, Public Utilities Commission of Ohio Case No. 14-1693-EL-RDR: Direct Testimony on Behalf of the Office of the Ohio Consumers' Counsel, September 11, 2015; deposition, September 30, 2015; supplemental deposition, October 16, 2015; testimony at hearings, October 21, 2015; supplemental testimony December 28, 2015; second supplemental deposition, December 30, 2015; testimony at hearings January 8, 2016.

Indicated Market Participants v. PJM Interconnection, L.L.C., FERC Docket No. EL15-88 (Capacity Performance transition auctions), Affidavit on behalf of the Joint Consumer Representatives and Interested State Commissions, August 17, 2015.

ISO New England Inc. and New England Power Pool Participants Committee, FERC Docket No. ER15-2208 (Winter Reliability Program), Testimony on Behalf of the New England States Committee on Electricity, August 5, 2015.

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