

Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617

Energy Consultant—Transmission, Power Plants, Nuclear Waste
overland@legalelectric.org

1110 West Avenue
Red Wing, Minnesota 55066
612.227.8638

P.O. Box 69
Port Penn, Delaware 19731
302.834.3466

January 23, 2012

Sandra Paske
Secretary to the Commission
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

James Lepinski
Docket Coordinator
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 54707-7854

RE: Revised Application for Intervenor Compensation –1-IC-455

Joint Application of Dairyland Power Cooperative, Northern States Power Company - Wisconsin, and Wisconsin Public Power, Inc., for Authority to Construct and Place in Service 345 kV Electric Transmission Lines and Electric Substation Facilities for the CapX 2020 Hampton - Rochester - La Crosse Project, Located in Buffalo, Trempealeau, and La Crosse Counties, Wisconsin

Wisconsin PSC Docket 5-CE-136

Dear Ms. Paske and Mr. Lepinski:

Enclosed please find Notice of Appearance for Citizens Energy Task Force, which has retained Carol A. Overland as its attorney in the above-captioned docket.

Enclosed also please find original and five copies of Citizens Energy Task Force Revised Application for Intervenor Compensation to facilitate participation in the above-entitled docket. This has been served on counsel for the Applicants as required.

Thank you for the opportunity to submit our revised Intervenor Compensation Request.

Very truly yours,



Carol A. Overland
Attorney for Citizens Energy Task Force and NoCapX 2020

cc: Lisa Agrimonti, Attorney for Xcel Energy; Jeffrey Landsman, Attorney for Dairyland; Lee Cullen, Attorney for ATC/ATC Management, Tim Noeldner, WPPI Energy.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Joint Application of Dairyland Power Cooperative,
Northern States Power Company-Wisconsin, and
Wisconsin Public Power, Inc. , for Authority to
Construct and Place in Service 345kV Electric
Transmission Lines and Electric Substation Facilities
]for the CapX Twin Cities-Rochester-LaCrosse
Project, Located in Buffalo, Trempealeau, and
LaCrosse Counties, Wisconsin

05-CE-136

Notice of Appearance

PLEASE TAKE NOTICE that the undersigned have been retained by and appear for
Citizens Energy Task Force (“CETF”), an intervenor in this docket, in all matters pertaining to
the above-captioned proceedings.

Please include the following attorney on the Service List for CETF (as well as NoCapX
2020):

Carol A. Overland
Attorney at Law
Legalelectric
1110 West Avenue
Red Wing, MN 55066

Phone: (612) 227-8638

email: overland@legalelectric.org



Dated: January 23, 2012

Carol A. Overland, MN Lic. #254617
Attorney at Law
Legalelectric.org
1110 West Ave (formerly P.O.Box 176)
Red Wing, MN 55066
(612) 227-8638
overland@legalelectric.org

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Joint Application of Dairyland Power Cooperative, Northern States Power Company - Wisconsin, and Wisconsin Public Power, Inc., for Authority to Construct and Place in Service 345 kV Electric Transmission Lines and Electric Substation Facilities for the CapX 2020 Hampton - Rochester - La Crosse Project, Located in Buffalo, Trempealeau, and La Crosse Counties, Wisconsin

PSC Docket 5-CE-136

PSC Intervenor Compensation Docket 1-IC-455

**Revised Application of
Citizens Energy Task Force
for
Intervenor Compensation
Pursuant to Wis. Stat. 196.31 and
Wis. Admin. Code, PSC Chapter 3**

**Revised Application of Citizens Energy Task Force
for
Intervenor Compensation**

PSC Docket 5-CE-136

PSC Intervenor Compensation Docket 1-IC-455

Attachment A	Case Related Information
Attachment B	Proposed Expenditures
Attachment C	Financial Information
Appendix A	Appraisal One -Work Plan and Budget MSB & Associates – Work Plan and Budget
Appendix B	CETF and NoCapX 2020 Work Plan and Budget
Appendix C	Not Applicable – No Income, No Audit
Appendix D	Not Applicable – Not Lobbyist
Appendix E	Not Applicable – No prior Intervenor Compensation
Appendix F	Not Applicable
Appendix G	CETF 2011 Budget
Appendix H	CETF Staff
Appendix I	CETF Board of Directors

ATTACHMENT A: CASE-RELATED INFORMATION

- 1. Provide information about the purpose of the intervention, including a discussion of the issues the applicant plans to address and how they affect the applicant's interest in the proceeding. An explanation is required of the ideas of viewpoints the applicant believes are substantive, novel or significant and why their presentation would contribute to a full and fair determination of the issues.**

Citizens Energy Task Force Intervention

After carefully considering the advice of the Commission and Commission staff, PSC Staff Data Requests and Orders of the Commission, CETF submits this revised Intervenor Compensation Request. CETF will join with NoCapX to utilize the services of Carol A. Overland, a Minnesota licensed attorney specializing in transmission issues, and will utilize some of the experts proposed by NoCapx 2020 in its Intervenor Compensation Request. Our focus and perspective is similar to that of NoCapX 2020 and we have determined that working more closely in alignment would benefit both organizations.

The proposed work of CETF is relevant to the specific issues before the ALJ and Commission and necessary to inform the record for the Commission's decision and is in no way duplicative of work proposed by any other party. No party is addressing each of the broad issues before the Commission, specifically, no party is addressing property valuation impacts and no party is addressing need from the perspective of CETF.

Citizens Energy Task Force Information

Citizens Energy Task Force (hereinafter "CETF") was formed in 2007 to oppose CapX2020 in Minnesota, and incorporated on May 8, 2008 as a Minnesota non-profit corporation, and is not an IRS 501(c)(3) non-profit corporation. CETF has a seven

member Board of Directors and 203 members across Minnesota and Wisconsin. Since the Minnesota Certificate of Need was granted, CETF has shifted its focus to Wisconsin, and now the majority of the Board of Directors are from Wisconsin. One member of the Board, Guy Wolf, and many general members would be affected by the proposed routes for the Hampton-Rochester-LaCrosse transmission line. CETF has maintained a website since 2008 focused on the CapX 2020 transmission projects. CETF's Secretary of State File Number is 2838737-2, and its federal ID number is 30-0480091, and its Registered Office Address is c/o Joseph M. Morse, 23375 Buffalo Ridge road, Winona, MN 55987-6064. CETF's fiscal agent is Mississippi River Revival. Additional information on the Mississippi River Revival is below in Appendix I.

CETF is a coalition of neighbors and citizens concerned about the proposed CapX2020 high voltage transmission lines in Minnesota and Wisconsin, and it represents the concerns of citizens who question the need for these particular high voltage power lines, and who support clean, sustainable, locally-generated power sources. CETF is the only citizens' organization holding regular informational meetings for residents in the CapX2020 project area. These informational meetings have included presentations to Town Boards, planning commissions, sustainability commissions, County Town Officer associations, citizen organized meetings, school board committees, and county board committees. Many of these governmental units have adopted Resolutions regarding CapX 2020 that have been filed as Comments in this docket.

In this proceeding, CETF takes the position that the CapX 2020 Hampton-Rochester-La Crosse transmission line project, which includes Alma to Holmen in

Wisconsin, is not needed and that its construction would have a huge negative impact on both the natural ecosystem and the economic well being of local residents as a result of that impact -- inimical to both human and natural environments. Moreover, the CapX 2020 project would have a negative impact on a more affordable energy future by investing precious resources on a future that imports energy rather than decreasing demand through demand response and energy efficiency and where generation is needed, relying on generating through distributed renewable generation.

CETF has not taken a position on route choice, which logically presumes need. CETF is focused on need and purpose of this project – that there is no need and that there is no public purpose. All routes thus far identified threaten to have negative environmental impacts on both publicly and privately held land. Western Wisconsin is blessed with a unique and beautiful landscape, home to a diverse and fragile ecosystem, containing one of the busiest flyways for migratory birds in North America. Wetlands, forests and streams provide recreation for outdoorsman and a livelihood for farmers, loggers and fisherman.

All CETF members are customers of one of the three utilities that are Applicants in the CPCN application. Six of the seven CETF Directors own property and live in Wisconsin, one of the “low-voltage” alternatives proposed in the Supplemental Need Study crosses CETF Board member Guy Wolf’s property. Many CETF members own property that may be directly affected by CapX 2020 -- that is their driving motivation for joining CETF.

During the past several months CETF members have met with hundreds of Western Wisconsin landowners concerned about eminent domain issues and negative

health effects of EMF, as well as chemical exposure potential from ROW clearance and maintenance. CETF members have deep concerns about a depreciation in property values, aesthetic degradation and the cost allocation of CapX 2020.

No other intervening party has the immediate geographic and intimate connection with the local stakeholders in the La Crosse/Winona area. Since February 1, 2011, CETF has either sponsored or taken part in numerous meetings and forums focused specifically on the CapX 2020 project in Wisconsin. CETF has collected 905 signatures to date opposing the project and met with many local government officials and bodies to facilitate resolutions about CapX 2020 in seven different localities. For example, recently, the Holmen School Board, La Crosse County and Town of Farmington passed detailed resolutions in opposition to CapX 2020. CETF has dispersed information to educate and inform citizens about the project and the tools they will need to participate in the CPCN proceeding. As a result, many local residents have participated in open houses and 'scoping meetings' and submitted comments on the ERF, participated in and submitted Comments to USDA's RUS about the project, and will participate in Public Hearings as well.

CETF Legal Representation

CETF will utilize the services and expertise of Carol A. Overland, a Minnesota licensed attorney specializing in transmission issues. After carefully considering the advice of the Commission and Commission staff, PSC Staff Data Requests and Orders of the Commission, CETF and NoCapX 2020 have joined efforts and submit this revised CETF Intervenor Compensation Request and together utilize Ms. Overland. Ms. Overland has 15 years of experience in utility regulatory proceedings, from nuclear

waste to transmission to natural gas plants, coal gasification and everything in between, representing intervenors primarily in Minnesota, and also consulting and/or representing Pro Hac Vice in the Midwest and also New Jersey, Delaware, Maryland, Colorado, California, Montana, and Washington state. She also has extensive knowledge and experience specific to the CapX 2020 projects gained over the last seven years, having been present at the planning stages at the NM-SPG MAPP meetings, intervening in the 2006 Minnesota Certificate of Need, and representing intervenors in the Brookings-Hampton, Fargo-St. Cloud and the Minnesota Hampton-Rochester-LaCrosse routes over the last four years. Ms. Overland has represented parties in the USDA's RUS scoping, DEIS and EIS process, and is now active in the Wisconsin CPCN docket for CapX 2020 Hampton-Rochester-LaCrosse. CETF can proceed immediately, more effectively and economically, by using Ms. Overland's prior data requests, filings and specific knowledge of this docket.

Citizens Energy Task Force Intervention Issues

Of the issues adopted at the Prehearing Conference, the Joint Intervenors will address each one through its intervention:

- 1) Is a 345 kV transmission line needed to satisfy the reasonable needs of the public for an adequate supply of electric energy?
- 2) Does the proposed project provide usage, service or increased regional reliability benefits to wholesale and retail customers in Wisconsin that are reasonable in relation to its cost?
- 3) Does the proposed project comply with the requirements of Wis. Stat. §§ 196.49(3)(b) and 196.49(3)(d)?
- 4) What is a reasonable cost for the proposed project?
- 5) What route for the proposed project is in the public interest, considering the requirements of Wis. Stat. §196.49(3)(d)?

- 6) Should all or any part of the construction be subject to other specific design requirements or other conditions and, if so, how will they be enforced?

CETF will focus on whether it is needed as defined by the laws of the state of Wisconsin, particularly whether the project would substantially impair the efficiency of the service of the public utility and whether it would provide facilities unreasonably in excess of the probable future requirements.

Consultants to be utilized by CETF

CETF will participate in this docket through extensive discovery, cross-examination, entry of exhibits, and through use of consultants. We will participate in the technical hearings and will execute initiatives related to dissemination of information and displays to communicate with residents in the project area about upcoming events and hearings. Assist staff with the preparation of comments and briefs. The work of CETF will not be duplicative as no other party is focused on grassroots opposition to this project, working directly with local communities, educating and informing, scheduling and participating in local community meetings for citizens in the CapX 2020 project area. CETF is will be addressing need for this project and impacts of this project, if built, on the communities along the route.

CETF will utilize the services of Kurt Keilisch, Appraisal One. Mr. Keilisch has nearly 30 years experience and will address the impacts of transmission lines on property valuation.

CETF has not proposed utilizing Mr. Neuman as an environmental consultant because the Commission likely thought that his work would duplicate that of Clean Wisconsin's consultant.

CETF will also utilize the services of Jerry Mendl and Geoffrey Crandall, principals of MSB Energy Associates, to address need and lack thereof for this transmission project. MSB Energy Associates of Middleton, Wisconsin, has extensive energy consulting experiences and since 1988 has provided their services before the Commission and elsewhere across the country to intervenors, businesses, state and federal government agencies, consumer and environmental organizations and utilities.

MSB has extensive experience before the Public Service Commission on issues of transmission planning and need, rate structures, IRP planning, renewable energy analysis and planning, and DSM and energy efficiency programs. CETF will retain MSB to focus on need and system and source alternatives through review of the application and related studies and reports, preparation and presentation of testimony based on findings in that review and in Applicants' responses to Discovery. The work of MSB will address the 2004-2005 CapX 2020 Vision, the significant economic changes since the initial Minnesota Certificate of Need application in 2007, and review of Applicant's long and short term forecasting, industry reliability and CapX 2020 reliability need claims, impact of industry shift to electric market and economic dispatch, the scale of project is in consideration of need requirements existing and claimed, the role of project as a small part of the much larger CapX 2020 Vision Plan, and options for meeting electrical demand without new transmission.

Additional information about MSB and the scope of its proposed work is detailed in Attachment A.

The work of CETF will not be duplicative as no party has committed to challenging need for this project, no party is actively opposing this project and no party

is challenging need from the perspective of landowners, residents and the public interest, that this project is not needed. This work is not duplicative of that of Citizens Utility Board because it represents ratepayers, which is a distinct subset of people in Wisconsin, and CUB is not addressing each of the issues before the Commission. This work is not duplicative of that of Clean Wisconsin as Clean Wisconsin is only addressing environmental issues and its experts are not addressing need. The perspective of landowners, local governments, residents who will be directly affected by this project is very different from the more detached analytical view of an organization representing ratepayer interests and those of a ratepayer narrowly looking at a potential rate increase.

CETF ATTACHMENT B: PROPOSED EXPENDITURES

Expenditures proposed by Citizens Energy Task Force for intervention, detailed below in Appendix A and Appendix B, include:

Consultants

Kurt Kielisch	36 hours + 27 staff hours:	\$ 8,600.00
	Expenses:	\$ 400.00
MSB Energy Assoc.	210 hours	\$31,500.00
Jerry Mendl and Geoff Crandall		
	Staff and Expenses:	\$ 500.00
CETF Attorneys Fees – Carol Overland (2/3)		\$30,930.00
	Expenses (travel, lodging, per diem):	\$ 3,280.00
George Nygaard		\$ 6,725.00
Ruth Chipps		\$ 7,600.00
	Chipps Expenses	<u>\$ 5,525.00</u>

TOTAL IC REQUEST: \$95,060.00

APPENDIX A: CONSULTANTS WORK PLAN AND BUDGET

Proposed Scope of Work – Kurt Keilisch, Appraisal One

NoCapX 2020 and CETf plan to retain Kurt Keilisch, Appraisal One, to address property valuation through a review of the application and testimony of the applicants, to assist with discovery to applicants and intervenors, and to present property valuation expert testimony and exhibits.

C.V. of Kurt Keilisch, Appraisal One, follows.

Budget for Consultant Kurt Keilisch, Appraisal One, at flat rate of \$8,600.00 for 36 hours plus additional 27 hours of staff time:

- Review relevant parts of application, DEIS and other documents;
- Assist with Discovery and review Discovery responses;
- Desktop investigation of affected areas and report encapsulating all my research, studies and experience with HVTLs and property value of all kinds for submission with testimony.
- Work with attorney on Direct, Rebuttal and Surrebuttal testimony.
- Review relevant testimony of other parties
- Appear for testimony at the technical hearing the week of May 5th
- Expenses for travel (one night overnight), copying costs: \$400.00

Kurt C. Kielisch, ASA, IFAS, SR/WA, R/W-AC
President/Senior Appraiser
Appraisal One
2401 Omro Road
Oshkosh, WI 54902
Ph 920-233-9836
www.forensic-appraisal.com

Work Experience

As a practitioner I entered the appraisal industry in 1984 employed by ValuPruf Valuation Service, Milwaukee, Wisconsin. Appraisal assignments through the years have included: single family residential, multi-family residential, farms and ranches, commercial properties, special use properties, tax assessment, ocean front properties, litigation support work, stigmatized properties, eminent domain, valuation consulting and impact studies. I have appraised properties and given expert witness services in Wisconsin, Illinois, Indiana, Michigan, Ohio, Wyoming and Virginia.

As a communicator I have authored the book: The Listing Appraisal Program (ATI press, 1996) and two magazine articles, Dead Body Appraisers (The Appraisal Buzz. October 3rd, 2002) and Expert Testimony and Reports: Is Change Good? (Working R.E. Magazine, February 2002). Additionally, I have been engaged in valuation related research projects and have co-authored a research paper entitled, EMFs and Their Effect on Real Estate Values in the De Pere, Wisconsin, and Surrounding Areas (1998) and completed research projects entitled: An Impact Study of a 345kV electric Transmission Line on Rural Property Value in Marathon County - Wisconsin (2006); Study of the Impact of a 345kV Electric Transmission Line in Clark County - Wisconsin (2006); Update Study of the Impact of a 345kV Electric Transmission Line in Clark County - Town of Hendren (2006/2009); Impact Study on the Effect of High Voltage Power Lines on Agricultural Property Value in Southwestern Indiana (2010); Wind Turbine Impact Study 2009 (2009- Wisconsin), Pioneer Wind Park I & II Project – Property Value Impact Report (2011- Wyoming), 18-studies on the impact of natural gas transmission pipelines; and other smaller studies on the impacts of property value due to highway proximity.

As an educator I have taught appraisal pre-licensing and continuing education courses throughout a multi-state area since 1994. In this field I have authored course curriculum for seven pre-licensing courses and twelve continuing education courses plus the creation of a two-year professional appraiser training program.

As a real estate investor I have reconstructed several residences, small commercial buildings, assembled eight properties and developed a thirteen unit waterfront condominium complex.

Academics

M.A. Education. Regent University, Virginia Beach, Virginia. This degree concentrated on the adult learner and state-of-the-art communication technology to enhance learning. The focus was on the adult learner.

B.A. Business Administration (economics minor). Lakeland College, Sheboygan, Wisconsin.

B.A. Biology (natural sciences minor). Silver Lake College, Manitowoc, Wisconsin.

Certifications/Designations/Organizations

Certified General Appraiser State of Wisconsin. License #1097. (Expires 12/31/2011)

Certified General Appraiser State of Michigan. License #1201073299 (Expires 7/31/2012)

Certified General Appraiser State of Wyoming. License #00425. (Expires 5/8/2013)

IFAS (Senior Member) Designated Member. National Association of Independent Fee Appraisers (NAIFA).

SR/WA (Senior Member) Designated Member. International Right-of-Way Association

R/W-AC (Appraisal Certified Member) Designated Member. International Right-of-Way Association

ASA-Urban Designated Member. American Society of Appraisers (ASA)

Review Appraiser – Department of Regulation and Licensing, State of Wisconsin. (contract position)

Approved Appraiser- Local Public Agency, State of Wisconsin.

Associate Member. Appraisal Institute (AI)

REALTOR member. Realtors Association of Northeast Wisconsin and National Association of Realtors.

Member. Real Estate Educators Association (REEA).

Milwaukee Chapter President and State Director (2004 & 2005), National Association of Independent Fee

Appraisers.

Approved R.E. Appraisal Instructor (past): Virginia, Maryland, Indiana, Illinois, Minnesota, Wisconsin.

Appraisal/Real Estate Courses (27 courses)

Fundamentals of Real Property Appraisal (40hrs). IAAO. University of Virginia, Charlottesville, VA.

Income Approach to Valuation (40hrs). IAAO. University of Virginia, Charlottesville, VA.

Real Estate Appraisal (45hrs). Alpha College of Real Estate. [Instructor]

Uniform Standards of Professional Appraisal Practice (15hrs). Alpha College of Real Estate. [Instructor]

Appraising the Small Income Residential Property (15hrs). Alpha College of Real Estate. [Instructor]

Advanced Income Appraisal I (30hrs). Alpha College of Real Estate. [Instructor]

Advanced Income Appraisal II (30hrs). Alpha College of Real Estate. [Instructor]

Residential Construction, Design & Systems (20hrs). Appraisal Training Institute. [Instructor]

Residential Cost Approach & Depreciation Methods (20hrs). Appraisal Training Institute. [Instructor]

Residential Market Approach & Extraction Methods (20hrs). Appraisal Training Institute. [Instructor]

Computer Applications in Appraisal Report Writing (15hrs). Appraisal Training Institute. [Instructor]

Completing the URAR in Compliance With FNMA Guidelines (15hrs). Appraisal Training Institute. [Instructor]

The Residential Appraisal Process (20hrs). Appraisal Training Institute. [Instructor]

Residential Appraisal Practicum (40hrs). Appraisal Training Institute. [Instructor]

Pipeline ROW Agent=s Development Program: Course 215 (16hrs). International Right-of-Way Association.

Eminent Domain Law Basics for Right-of-Way Professionals: Course 803 (16hrs). International Right-of-Way.

Financial Analysis of Income Properties (16hrs). National Association of Independent Fee Appraisers (NAIFA).

Appraisal of Partial Acquisition: Course 401 (40hrs). International Right-of-Way Association.

National Uniform Standards of Professional Appraisal Practice (USPAP): Course 2005 (15hrs). NAIFA.

Easement Valuation: Course 403 (8 hrs). International Right-of-Way Association.

Principles of Real Estate Negotiation: Course 200 (16hrs). International Right-of-Way Association.

Bargaining Negotiations: Course 205 (16hrs). International Right-of-Way Association.

Principles of Real Estate Appraisal: Course 400 (exam). International Right-of-Way Association.

Principles of Real Estate Law: Course 800 (exam). International Right-of-Way Association.

Principles of Real Estate Engineering: Course 900 (exam). International Right-of-Way Association.

SR/WA Comprehensive Exam: (Passed) International Right-of-Way Association.

Course 420: Business Practices & Ethics (8hrs). Appraisal Institute.

Appraisal/Real Estate Seminars (31 courses)

Real Estate Taxation (7hrs). University of Wisconsin - Continuing Education Division.

Review Appraising as the Supervising Appraiser (3hrs). Appraisal Training Institute. [Instructor]

Legal Ramifications of Environmental Laws (3hrs). International Association of Assessing Officers (IAAO).

Virginia State Mandatory Continuing Education (4hrs). Appraisal Training Institute. [Instructor]

Appraising the Small Income Property (8hrs). Appraisal Training Institute. [Instructor]

Listing Appraisals (7hrs). Appraisal Training Institute. [Instructor]

Marshall & Swift Residential Cost Approach- Sq.Ft. method, (7hrs). Western Illinois University. [Instructor]

Marshall & Swift Residential Cost Approach- Segregated. method, (7hrs). Western Illinois University. [instars]

Residential Construction, Design and Systems (7hrs). Appraisal Training Institute. [instructor]

EMF and Its Impact on Real Estate (4hrs). Appraisal Training Institute. [instructor]

Easements and Their Effect on Real Estate Value (7hrs). Appraisal Training Institute. [instructor]

Exploratory Data Analysis: A practical guide for appraisers. (3hrs) Appraisal Institute.

Residential Statistical Modeling. (3 hrs) Appraisal Institute.

Valuation Modeling: A case study. (3 hrs) Appraisal Institute.

Real Estate Valuation Cycles. (3 hrs) Appraisal Institute.

Subdivision Analysis (3hrs). Appraisal Institute.
Appraisal of Nursing Facilities. (7 hrs) Appraisal Institute.
National Standards of Professional Appraisal Practice - Course 400. (7 hrs) Appraisal Institute.
Land Valuation Adjustment Procedures. (7 hrs) Appraisal Institute.
Valuation of Detrimental Conditions in Real Estate. (7 hrs) Appraisal Institute.
Appraising Conservation Easements (7hrs). Gathering Waters Conservancy.
ROW Acquisition in an Environment of Power Demand Growth & Legislative Mandates (12hrs). IRWA- Minnesota.
Analyzing Distressed Real Estate. (4 hrs). Appraisal Institute.
7 hr National USPAP course for 2008-2009 (7hrs). International Right-of-Way Association.
6th Annual Condemnation Appraisal Symposium (6hrs). Appraisal Institute.
Contemporary Issues in Condemnation Appraisal (4hrs). Appraisal Institute.
7-hr National USPAP course for 2010 (7hrs). International Right-of-Way Association.
Real Estate Finance Statistics and Valuation Modeling (14hrs). Appraisal Institute.
Michigan Law Update (2hrs): Middleton Real Estate Training, Inc.
8th Annual Condemnation Appraisal Symposium (6hrs). Appraisal Institute
Golf & Hotel Valuation (3.4 hrs). International Right-of-Way Association

EXPLANATION OF DESIGNATIONS

IFAS- For this senior level designation the appraiser must meet the requirements for the Member [IFA], successfully pass the Senior Member Examination, score a passing grade on a narrative demonstration report on an income producing property conforming with prescribed guidelines and meet educational and experience requirements as outlined by the Association. In addition, the designation requires a minimum of 4 years appraisal experience in commercial type properties, a State Certified General Appraisal license, successful completion of over 200 hours of appraisal course work, completion of the current USPAP course, a college degree and the recommendation of the appraiser's peers and local chapter. (Source- www.naifa.com) All IFAS members must adhere to the Code of Ethics of the Association and keep up-to-date with continuing education.

R/W-AC. The Right of Way (R/W) Certification is an esteemed professional designation granted to members who have achieved professional status through experience, education and examination in a specific discipline. Earning this certification demonstrates an unparalleled achievement in a single discipline and reinforces a standard of excellence in services provided to the public. (Source- www.irwaonline.org) All R/W-AC members must adhere to the Code of Ethics of the Association and keep up-to-date with continuing education.

SR/WA- This is the most prestigious professional designation granted by the International Right-of-Way Association to members who have achieved professional status through experience, education and examination. The SR/WA designation requires training and examination in seven major right-of-way disciplines. The SR/WA designation says, "I have more than five years of right-of-way experience, plus I have had formal training in a wide variety of right-of-way areas." The SR/WA professional may be a specialist in one area such as appraisal, engineering, or law, but also must be familiar with the other seven disciplines associated with the right-of-way profession. Additional requirements for the SR/WA designation include: a bachelor degree, 5 years of right-of-way experience, successful completion of four core courses and four elective courses, passing the all day comprehensive exam and recommendation from the designee's peers and local chapter. The SR/WA designation is the only designation reflecting evidence of professional attainment in the right-of-way field. (Source www.irwaonline.org) All SR/WA members must adhere to the Code of Ethics of the Association and keep up-to-date with continuing education.

ASA- Urban Real Property. The ASA designation is the senior designation granted by the American Society of Appraisers, which is the only multi-discipline international appraisal association in America. The ASA-Urban designation requires the passing of five advanced level commercial appraisal courses, the passing of a comprehensive exam, a passing grade on a demonstration narrative report, 5 years of full-time appraisal experience, a Certified General appraisal license and the recommendation of the local and national membership committee. All ASA designated members must adhere to the Code of Ethics of the Association and keep up-to-date with continuing education. (Source- www.appraisers.org)

Proposed Scope of Work - MSB Energy

Jerry Mendl and Geoff Crandall

CETF will utilize the services of Jerry Mendl and Geoffrey Crandall of MSB Energy Associates to address need and lack thereof for this transmission project. MSB Energy Associates of Middleton, Wisconsin, has extensive energy consulting experiences and since 1988 has provided their services before the Commission and elsewhere across the country to intervenors, businesses, state and federal government agencies, consumer and environmental organizations and utilities.

MSB work will focus on need and system and source alternatives through review of the application and related studies and reports, preparation and presentation of testimony based on findings in that review and in Applicants' responses to Discovery. MSB will address the significant economic changes since the initial Minnesota Certificate of Need application in 2007, a review of Applicant's long and short term forecasting, industry reliability and CapX 2020 reliability need claims, impact of industry shift to electric market and economic dispatch, scale of project is unreasonable in consideration of need requirements existing and claimed, role of project in larger CapX 2020 Vision Plan, options for meeting electrical demand without new transmission. Specifically, that work will include a review of the application and supporting documents, Applicants' answers to Discovery of all parties, analysis of the need claim and forecasting, evaluations of alternatives to the project, cost of the project and cost allocation to Wisconsin ratepayers and residents, Direct Testimony and Rebuttal and Surrebuttal as needed, and live testimony at the technical hearing.

Task	Hours	Dollars
Review Application & docket filings	30	4500
Discovery – Prepare Discovery and review those of others, review answers	6	900
Forecasting	45	67500
Reliability	20	3000
Alternatives	50	7500
Draft Testimony – Direct, Rebuttal, Surrebuttal & prepare exhibits	35	5250
Testimony – review others & assist with prep for cross-examination & exhibits	8	1200
Technical Hearing in Madison – 8hr/day x 1`	8	1200
Initial & Reply Briefs, assist and comment	4	600
Assist with response to staff comments & matrix	4	600
TOTAL	210	31,500

Projected expenses: \$500.00

JERRY E. MENDL

President

MSB Energy Associates

AREAS OF EXPERTISE

- + Analysis of energy resource adequacy, cost and availability
- + Evaluation of alternative energy resource options
- + Analysis of electric utility bulk power supplies
- + Analysis of electric utility projected merger savings and implications on system operations and costs
- + Transmission system analysis
- + Service delivery and markets in a restructured electric utility industry

EDUCATION

1973 B.S. Degree in Nuclear Engineering, With Very High Honors, from the University of Wisconsin, Madison, Wisconsin

1974 M.S. Degree in Nuclear Engineering from the University of Wisconsin, Madison, Wisconsin.

EXPERIENCE

1987-Present

President

MSB Energy Associates, Inc.

Middleton, Wisconsin

Since co-founding MSB Energy Associates in 1988, Mendl has served public-sector clients in Arizona, Kentucky, California, Utah, Nevada, Washington, Texas, Alaska, Iowa, Illinois, South Carolina, Connecticut, Massachusetts, Vermont, Maryland, Michigan, Missouri, Minnesota, Louisiana, Wisconsin, Pennsylvania, Georgia, Hawaii, Ohio, New Jersey, the District of Columbia and Ontario. Much of his recent work has involved electric utility restructuring, low-income consumer energy affordability and service issues, prudence of gas and electric utility planning and purchase practices, and analyzing need for transmission lines. He assesses "green pricing" tariffs for renewable electric resources and fuel/purchase power costs for electric and natural gas utility rate cases and renewable energy alternatives for utility construction cases. He evaluates electric utility restructuring alternatives and prepares restructuring policy recommendations and supporting technical information. He analyzes long-range plans and planning methods used by gas and electric utilities. He prepares and presents reports, recommendations and testimony.

He conducted engineering, environmental, economic and life-cycle cost analyses of alternate energy resource options, including improved end-use energy efficiency and renewable resources. Mendl developed state regulatory commission codes for implementing integrated resource planning and evaluated the adequacy of existing and proposed codes. Mendl was both organizer and presenter for a series of five least-cost planning workshops across the U.S. sponsored by the National Association of Regulatory Utility Commissioners (NARUC). He also participated in five Conservation Law Foundation collaborative projects in the northeastern states.

1974-1988

Administrator, Division of Systems Planning, Environmental Review and Consumer Analysis (1979-1988)
Director, Bureau of Environmental and Energy Systems (1976-1979)
Public Service Engineer (1974-1976)
State of Wisconsin, Public Service Commission
Madison, Wisconsin

Mendl was employed by the Wisconsin Public Service Commission for 14 years (1974-1988), and was responsible for the development and evolution of Wisconsin's long-range planning process for electric utilities. He had overall responsibility for directing the Commission's activities concerning utility long-range plans. In addition, Mendl had overall responsibility for and directed the preparation of environmental impact statements and environmental assessments, identifying expected impacts as well as evaluating alternatives, for five large power plants, numerous transmission lines, a major natural gas pipeline, and many policy issues including Electric Space Heat, Electric Utility Tariffs, Electric Sales Promotion, Small- Power Production and Cogeneration, and Extension of Service. Mendl was also responsible for directing the preparation of major studies, including *The Alternative Electric Power Supply Study*, *Alternative Electric Power Supply - Update*, and *Utility SO₂ Cleanup - Cost and Capability*. (The *Alternative Electric Power Supply Study* and *Update* identified renewable energy, load management and energy efficiency resources that would economically meet Wisconsin's long term electricity needs.) Mendl testified before the Wisconsin Commission in rate cases, planning cases, construction certificate cases and policy cases. He also appeared before other state Commissions and the Federal Energy Regulatory Commission.

OTHER DISTINCTIONS

Mendl staffed the NARUC Subcommittee on Energy Conservation for two and one-half years, and was closely involved with the preparation of the *Least-Cost Planning Handbook for Public Utility Commissioners*.

Mendl also was appointed to serve a four-year term on the Research Advisory Committee of the National Regulatory Research Institute (NRRI). One of seven regulatory staff selected nationally, Mendl helped NRRI to shape its research agenda to be more useful and responsive to the regulatory community.

Mendl is a Registered Professional Engineer in the State of Wisconsin.

TESTIMONY

Mendl, since co-founding MSB Energy Associates in 1988, has testified in the following proceedings:

Submitted To:	Subject	Docket No.	Date
Nevada Public Utilities Commission	Nevada Power and Sierra Power Annual DSM Report Update	11-07026, 11-07027	2011
Nevada Public Utilities Commission	Nevada Power and Sierra Power electric fuel and power and Sierra LDC gas cost recovery practices (DEAAs)	11-03003, 11-03004, 11-03005	2011
Nevada Public Utilities Commission	Nevada Power Energy Supply Plan – gas hedging and electric power sales	10-09003	2010
Nevada Public Utilities Commission	Sierra Pacific Power Integrated Resource Plan/Energy Supply Plan	10-07003	2010
Nevada Public Utilities	Nevada Power and Sierra power electric	10-03003 &	2010

Commission	fuel and power cost recovery practices (DEAAs)	10-03004	
Nevada Public Utilities Commission	Nevada Power and Sierra Pacific Power Energy Supply Plan Update	09-07003 & 09-09001	2010
Wisconsin Public Service Commission	Glacier Hills Wind Park application by WEPCo, analyze cost/benefits and RTO dispatch	6630-CE-302	2009
Nevada Public Utilities Commission	Nevada Power electric fuel and power cost recovery practices (DEAA)	09-02029	2009
Nevada Public Utilities Commission	Sierra Power gas and electric fuel and power cost recovery practices (DEAA)	09-02030 & 09-02031	2009
Wisconsin Public Service Commission	Need analysis for 345 kV transmission line proposed by American Transmission Company	137-CE-147	2009
Arizona Corporation Commission	Sulphur Springs Valley Electric Cooperative power procurement review	E-01575A-08-0328	2009
Nevada Public Utilities Commission	Nevada Power Energy Supply Plan Update	08-08030	2008
Nevada Public Utilities Commission	Sierra Power Energy Supply Plan Update	08-08031	2008
Nevada Public Utilities Commission	Sierra Power gas and electric fuel and power cost recovery practices (DEAA)	08-02043 & 08-02044	2008
Nevada Public Utilities Commission	Nevada Power fuel gas and power cost recovery practices (DEAA)	08-02042	2008
Nevada Public Utilities Commission	Westpac Utilities fuel purchase practices and costs (including merging of utility LPG and natural gas rates)	07-05019 & 07-05020	2007
Nevada Public Utilities Commission	Nevada Power Amendment to 2006 IRP and Energy Supply Plan update forward sales proposal	07-07013	2007
Nevada Public Utilities Commission	Sierra Pacific Power approval of 2007 IRP forward sales proposal	07-06049	2007
Nevada Public Utilities Commission	Southwest Gas fuel procurement practices and setting DEAA rate	07-05015	2007
Georgia Public Service Commission	Georgia Power IRP 2007 demand side management plan, energy efficiency and cost tests	24505-U	2007
Nevada Public Utilities Commission	Nevada Power fuel gas and power purchase practices (BTER & DEAA)	07-01022	2007
Nevada Public Utilities Commission	Sierra Pacific Power fuel gas and power purchase practices (BTER & DEAA)	06-12001	2007
Arizona Corporation Commission	UNS Gas prudence of gas procurement practices	G-04204A-05-0831	2007

Nevada Public Utilities Commission	Westpac Utilities fuel purchase practices and costs (BTER & DEAA)	06-05016 & 06-05017	2006
Nevada Public Utilities Commission	Nevada Power Integrated Resource Plan - gas purchase strategies	06-06051	2006
Nevada Public Utilities Commission	Sierra Pacific Power Energy Supply Plan - gas purchase strategies	06-07010	2006
Wisconsin Public Service Commission	Strategic Energy Assessment - electrical adequacy through 2012	5-ES-103	2006
Nevada Public Utilities Commission	Nevada Power fuel gas and power purchase practices (DEAA)	06-01016	2006
Nevada Public Utilities Commission	Sierra Pacific Power fuel gas and power purchase practices (DEAA)	05-12001	2006
Michigan Public Service Commission	MichCon gas cost recovery factor, contingent factor, and purchase acquisition strategy	U-14717	2006
Michigan Public Service Commission	Consumers gas cost recovery factor, contingent factor, and purchase acquisition strategy	U-14716	2006
Nevada Public Utilities Commission	Nevada Power fuel gas and power purchase practices (BTER)	06-01016	2006
Nevada Public Utilities Commission	Sierra Pacific Power fuel gas and power purchase practices (BTER)	05-12001	2006
Nevada Public Utilities Commission	Nevada Power gas purchase practices – Energy Supply Plan	05-9017	2005
Nevada Public Utilities Commission	Sierra Pacific Power gas purchase practices – Energy Supply Plan	05-9016	2005
Michigan Public Service Commission	Consumers gas cost recovery factor, contingent factor, and purchase acquisition strategy	U-14403	2005
Michigan Public Service Commission	MichCon gas cost recovery factor, contingent factor, and purchase acquisition strategy	U-14401	2005
Kentucky Public Service Commission	Analysis of need for and electrical alternatives to EKPC Cranston-Rowan County transmission line	2005-00089	2005
Nevada Public Utilities Commission	Nevada Power gas purchase practices	04-9004	2004
Nevada Public Utilities Commission	Sierra Pacific Power gas purchase practices	04-7004	2004
Nevada Public Utilities Commission	Prudence of Southwest Gas PGA costs, purchase practices	03-12012	2004
Michigan Public Service Commission	MichCon gas cost recovery factor, contingent factor, and purchase	U-13902	2004

	acquisition strategy		
Wisconsin Public Service Commission	WPS rate case, low income programs, Weston 4 pre-certification expenses and capital	6690-UR-115	2003
Wisconsin Public Service Commission	Alliant rate case, RiverSide purchase power cost and incentive, Columbia maintenance and outages	6680-UR-113	2003
Wisconsin Public Service Commission	Alliant rate case, RockGen purchase power savings bonus, coal procurement	6680-UR-112	2002
Wisconsin Public Service Commission	Assess fuel and purchase power issues in WPS rate case	6690-UR-114	2002
Wisconsin Public Service Commission	Assess fuel and purchase power issues in MG&E rate case	3270-UR-111	2002
Wisconsin Public Service Commission	Assess renewable energy and other alternative resources in WE Power the Future –Port Washington case	05-CE-117	2002
Wisconsin Public Service Commission	Assess costs related to formation and operation of American Transmission Company	05-EI-129	2002
Wisconsin Public Service Commission	Filed comments in investigation of purchase power incentive mechanisms	05-EI-131	2002
Wisconsin Public Service Commission	Alliant rate case, adequacy of planning, purchase power contracts, coal contracts	6680-UR-111	2002
Michigan Public Service Commission	Analyze proposed gas cost recovery factor and plan, and gas procurement practices.	UR-13060	2002
Wisconsin Public Service Commission	WPS rate case, fuel costs, adequacy of planning, purchase power	6690-UR-113	2002
Wisconsin Public Service Commission	Alliant fuel cost rate case, adequacy of planning, purchase power contracts	6680-UR-110	2001
Wisconsin Public Service Commission	Wisconsin Electric fuel rate case, fuel costs, adequacy of planning, purchase power contracts	6630-UR-111	2001
Wisconsin Public Service Commission	Rulemaking regarding electric utility fuel and purchased power cost recovery	1-AC-197	2001
Wisconsin Public Service Commission	Nuclear spent fuel dry cask storage expansion at Point Beach	6630-CE-275	2000
Wisconsin Public Service Commission	WPS rate case, fuel costs, adequacy of planning, purchase power	6690-UR-112	2000
Wisconsin Public Service Commission	Alliant fuel cost rate case, adequacy of planning, prudence of plant maintenance practices, purchase power	6680-UR-110	2000

Wisconsin Public Service Commission	Rulemaking regarding environmental impact analysis and public input process	1-AC-185	1999
Michigan Public Service Commission	Over-recovery of revenues due to declining coal costs	U-11560	1999
Michigan Public Service Commission	Reasonableness of proposed settlement regarding recovery of nuclear plant replacement power costs through power cost recovery factor, suspension of factor	U-11181-R	1999
Michigan Public Service Commission	Fuel and purchase power surcharge, coal costs	U-11180-R	1998
Vermont Public Service Board	Prudence of Green Mountain Power purchase and management of Hydro-Quebec power	5983	1997
Michigan Public Service Commission	Analysis of coal costs, purchase practices, spot market	U-10971-R	1997
Michigan Public Service Commission	Suspension of the fuel and purchase power factor and planning in the transition to restructured utilities	U-11453	1997
Wisconsin Public Service Commission	IEC merger (of WPL/IES/IPC), need and environmental issues regarding proposed Mississippi River transmission crossings	6680-UM-100	1997
Pennsylvania Public Utility Commission	Restructuring, stranded cost, and securitization -- economic and environmental issues	R-00973877	1997
Michigan Public Service Commission	Fuel and purchase power surcharge, impact of sales promotion	U-11181	1997
Wisconsin Public Service Commission	Primergy merger (of WEPCO/NSP), impact on state regulatory authority	6630-UM-100/4220-UM-101	1996
Michigan Public Service Commission	Gas cost recovery adjustments	U-10640-R	1996
Pennsylvania Public Utility Commission	Electric discounted rates, gas/electric competition	R-943280C0001	1996
Michigan Public Service Commission	Fuel and purchase power surcharge, impact of WEPCO/NSP merger	U-10966	1996
Michigan Public Service Commission	Fuel and purchase power surcharge, impact of energy efficiency	U-10971	1996
Minnesota House Committee on Taxes	Impact of cogeneration project on NSP ratepayers	HF637	1996
Minnesota Senate Committee on Jobs, Energy and Community	Impact of cogeneration project on NSP ratepayers	SF1147	1996

Development			
Wisconsin Public Service Commission	Role of DSM in Advance Plan-7 in light of potential restructuring	05-EP-7	1995
City Public Service Board of San Antonio	Integrated resource planning process (1992 EPAAct hearings)	NA	1994
Maryland Public Service Commission	1992 EPAAct rules	8630	1994
Georgia Public Service Commission	Commercial and Industrial DSM programs for Savannah Electric	4135-U	1993
Public Utilities Commission of Ohio	Analysis of forecasts and long range plans for Ohio Power and Columbus Southern (case settled)	90-659-EL-FOR and 90-660-EL-FOR	1990
Georgia Public Service Commission	Integrated resource plan analyses for Georgia Power and Savannah Electric	4131-U and 4134-U	1992
New Orleans City Council	Least-cost planning rules	14629 MCS	1991
District of Columbia Public Service Commission	Potomac Electric least-cost plan analysis	834 Phase II	1990
Massachusetts Department of Public Utilities	Boston Gas plan integrated resource plans	90-55	1990
Massachusetts Department of Public Utilities	Boston Gas commercial and industrial DSM, cost recovery	90-320	1991
Hawaii Public Service Commission	Least-cost resource planning	6617	1991
Georgia Public Service Commission	Least-cost planning and facility certification rules	4047-U	1991
New Jersey Board of Public Utilities Commissioners	Transmission line certificate (case settled)	NA	1990
South Carolina Public Service Commission	Transmission line certificate	88-519-E	1988
Vermont Public Service Board	Least-cost planning	5270	1988
D.C. Public Service Commission	Least-cost planning	834	1987

Mendl also assisted in preparing testimony and testified in numerous cases as a senior staff witness at the Wisconsin Public Service Commission. Dates are approximate.

- Advance Plans 1 through 4 (Dockets 05-EP-1 through 05-EP-4 -- on various occasions between 1977 and 1988) before the Wisconsin Public Service Commission
A wide variety of planning issues including forecasts, nuclear vs coal power, alternative energy, renewable energy, load management, transmission planning, demand-side management resources, principles and methods of integrated resource planning
- Rate Cases (various occasions between 1976 and 1988) including landmark time-of-use rate case (6630-ER-2) for Wisconsin Electric Power

Environmental and consumer impacts of rate levels and alternative rate designs before the Wisconsin Public Service Commission

- Construction Cases before the Wisconsin Public Service Commission
 - Pleasant Prairie Power Plant (1976-1978)
 - Germantown Combustion Turbines (1976-1977)
 - Weston 3 (1979)
 - Edgewater 5 (1980)
 - Apple River -- Crystal Cave Transmission Line (1980)
 - Prairie Island -- Eau Claire Transmission Line (1981-1982)
 - North Madison -- Huiskamp -- Sycamore Transmission Line (1982)
 - Point Beach Nuclear Plant Steam Generator Replacement (1982)
 - Wisconsin Natural Gas Pipeline (1986)

Need for power, appropriateness of the utility proposals, and the comparative economics of alternatives, environmental impacts
- Other Appearances while employed at the Wisconsin Public Service Commission
 - Planning investigation before the Connecticut Department of Public Utilities Control Authority (1975); uranium availability and resource alternatives
 - Rulemaking proceedings before Wisconsin Legislative Committees (1975-1982); planning, siting, and environmental impact analysis rules
 - Tyrone Nuclear Project Termination cost recovery hearing before the Federal Energy Regulatory Commission (1980)
 - Acid Rain legislation before Wisconsin Legislative Committees (1984-1985)

Selected Clients

Mendl has served the following public sector clients since 1988.

Client	Nature of Service
Alaska Housing Finance Corporation	Analysis of applicability of EPA standards to Alaska resource selection process.
American Public Power Association	Prepared whitepaper on distributed resources, "Distributed Resources: Options for Public Power" and presented it to APPA National Meeting and distributed resources workshops.
Arizona Corporation Commission	Analyze UNS Gas fuel procurement practices, provide testimony regarding prudence, and develop auditor training manual. Analyzed Semptra request to be allowed to compete for selected retail loads. Analyzed Sulphur Springs Valley Electric Coop purchase power practices.
California Low Income Governing Board	Analysis of options to deliver energy efficiency and assistance programs to low-income households in a restructured utility environment. Assist Board to develop low-income programs and policies under interim utility administration.
City of Chicago	Evaluate municipalization, especially regarding power availability and cost, transmission constraints, cogeneration potential.
Citizen's Utility Board of Wisconsin	Evaluate energy efficiency and load management programs in light of possible industry restructuring. Evaluate fuel rate cases and recommend revenue reductions in testimony for Alliant, Wisconsin

	Electric, Madison Gas & Electric and Wisconsin Public Service. Assess ATC formation and operation costs. Comment on and develop fuel rules, purchase power incentives. MISO collaborative
Center for Neighborhood Technologies	Analysis of value of avoiding generation, transmission and distribution through energy efficiency, load management and distributed generation.
Clean Wisconsin	Review Strategic Energy Assessments, provide comments to Wisconsin PSC
Conservation Law Foundation of New England	Collaboratives with Boston Edison, United Illuminating, Eastern Utilities Association, and Nantucket Electric regarding system planning approaches, avoided costs, resource screening. Collaborative with Green Mountain Power regarding Vermont Yankee end-of-life planning.
Dane County Energy Collaborative	Technical contractor to collaborative analyzing 345 kV transmission proposal and alternatives to meet Dane County energy needs.
District of Columbia Energy Office	Analysis of DC Natural Gas' and PEPCo's integrated resource planning.
District of Columbia Public Service Commission	Testimony regarding least cost planning principles and rules.
Environmental Law and Policy Center	Analyzed potential impacts of proposed merger of Wisconsin Electric Power Company and Northern States Power Company on state regulatory authority in Wisconsin and Minnesota. Analyzed environmental impacts related to proposed merger of WPL and two Iowa utilities (IES and IPC), including the proposed transmission line crossings of Mississippi River and changes in air pollutant emissions. Analyzed electric and gas energy efficiency plans in Iowa, Illinois, Michigan and Ohio
Environmentalists/Penn. Energy Project	Analyzed PECO application to securitize stranded costs, especially on economic and environmental impacts that could result from authorizing overestimated stranded costs. Analyzed utility retail access pilot programs. Analyzed restructuring plans for PECO and PP&L.
Germantown Settlement, Philadelphia	Advise regarding business structure and market to aggregate load and/or provide energy efficiency and energy assistance services to low-income households.
Georgia Public Service Commission	Developed integrated resource planning and facility certification rules. Developed integrated resource plans and reviewed utility filings. Monitored utility DSM programs. Evaluated GP demand side plan for 2007 IRP. Analyzed DSM selection process in DSM Working Group setting on behalf of Commission Staff.
Hawaii Division of Consumer Advocacy	Developed integrated resource planning rules.
Illinois Citizens Utility Board	Analyzed Illinois electric supply auction, suggested modifications to better incorporate energy efficiency and demand response resources.
Iowa Department of Natural Resources	Developed and implemented workshops to train building operators and architects in energy efficiency and renewable energy resource

	opportunities.
Kentucky Public Service Commission	Analyzed need and alternatives for an EKPC transmission line and a prepared report. Presented testimony defending and explaining report. Analyzed need and alternatives for an AEP transmission line and a prepared report.
Lake Michigan Coalition	Analyzed nuclear spent fuel dry cask storage expansion proposal
Maryland Public Service Commission	Reviewed two utility long-range plans and suggested improvements.
Massachusetts Division of Energy Resources	Analysis of Boston Gas Co. integrated resource plans and residential energy efficiency programs. Analysis of Boston Gas's commercial and industrial energy efficiency programs.
Michigan Community Action Agency Association	Analysis of Michigan electric utility restructuring proposals and impacts on retail prices. Analysis of MichCon gas cost recovery case and factor. Analyses of Indiana-Michigan, Consumers Energy, Wisconsin Electric and Northern States Power-Wisconsin power supply cost recovery cases and factors, including analysis of coal and power purchase practices, demand-side management, and nuclear plant outage costs. Analysis of Northern States Power/Wisconsin Electric Power Co. proposed merger.
Missouri Public Service Commission	Developed rules for electric resource planning and gas resource planning. Evaluated three electric utility plans filed pursuant to rules.
National Association of Regulatory Utility Commissioners	Organized, prepared and presented at five workshops throughout the U.S. sponsored by NARUC/DOE.
Natural Resources Defense Council, Mid-Atlantic Energy Project Collaborative	Evaluated resource planning and selection processes used by PSE&G to prepare plan filings.
New Jersey Department of the Public Advocate	Analyzed a transmission line application.
City of New Orleans	Developed least cost planning rules, guided a public working group to develop demand-side programs.
Nevada Office of Attorney General, Bureau of Consumer Protection	Sierra Pacific Power and Nevada Power Energy Supply Plans, Base Tariff Energy Rates and Deferred Energy Adjustment Accounts - gas purchase practices and prudence; Southwest Gas and Westpac PGA prudence analysis, gas purchase practices
Nevada Public Utilities Commission, Regulatory Operations Staff	Southwest Gas PGA prudence analysis, gas purchase practices
Northeast States for Coordinated Air Use Management	Electric vehicle analysis.
Ohio Office of Consumer Council	Analyzed two utilities' long-range plans and energy efficiency resource options.
Ontario Energy Board	Evaluated need for natural gas integrated resource planning rules.

The Opportunity Council	Evaluated gas DSM programs to be considered by Cascade Natural Gas in Washington.
Pennsylvania Office of Consumer Advocate	Evaluated demand-side management programs for several electric utilities. Investigated causes of Winter Emergency of 1994. Analyzed electric "flexible rates" and gas/electric competition issues. Analyzed electric reliability concerns in a restructured and competitive market. Evaluated electric energy efficiency plans..
RENEW Wisconsin	Analyzed MG&E's green pricing tariff, compared costs of conventional resources to green resources to determine whether a green premium tariff was appropriate
Responsible Use of Rural and Agricultural Land (RURAL)	Evaluated air and licensing issues related to a proposed power plant. Evaluated Public Service Commission proposed environmental and siting rule changes. Analyzed rules governing environmental review and public comment process and provided testimony before PSCW.
South Carolina Office of Consumer Advocate	Analyzed a transmission line application.
Southeast Wisconsin Energy Initiative	Technical contractor to collaborative analyzing 345 kV transmission proposal and alternatives to meet energy needs in southeastern Wisconsin.
Texas ROSE	Developed electric planning rules. Analyzed city of San Antonio resource plan.
U.S. Environmental Protection Agency	Developed handbook, "Energy Efficiency and Renewable Energy: Opportunities from Title IV of the Clean Air Act", which focuses on how energy efficiency and renewables relate to acid rain compliance strategies.
U.S. Environmental Protection Agency and U.S. Department of Energy	Analyzed and compared utility supply- and demand-side resource selection for Clean Air Act compliance on the Pennsylvania-New Jersey-Maryland (PJM) interconnection.
Utah Committee on Consumer Services	Analyzed DSM cost recovery mechanism, avoided cost methods, cost effectiveness tests, assisted in settlement discussions and would have prepared testimony if issues not settled.
Vermont Natural Resources Council and Vermont Public Interest Research Group	Testimony regarding least cost planning principles and rules.
Vermont Public Service Board	Testimony regarding the prudence of Green Mountain Power's planning and management of the Hydro-Quebec power purchase.
Wisconsin Department of Administration	Analysis of new home characteristics built in northeastern Wisconsin, permit data, survey development and report
Wisconsin's Environmental Decade	Review of Draft Environmental Impact Statement of major 345 kV transmission line in northwestern Wisconsin, develop comments.

Geoffrey C. Crandall

Vice President and Principal

EDUCATION

B.S. in Business and Pre-Law, Western Michigan University, 1974.

Mr. Crandall has also completed courses at Michigan State University Graduate School, the University of Wisconsin-Madison and Wayne State University, in areas of federal taxation, accounting, management and the economics of utility regulation. Mr. Crandall also completed the examination for the National Conference of States on Building Codes and Standards Energy Auditor.

EXPERIENCE

Mr. Crandall joined MSB in January 1990. He specializes in residential and low-income issues, the impact of energy efficiency and utility restructuring on customers. Mr. Crandall has addressed issues related to energy efficiency and residential customers and utility restructuring in California, New York, Colorado, Iowa, and Michigan. He has analyzed and/or designed energy efficiency programs for residential customers in Michigan, Georgia, Wisconsin, Arizona, and New Orleans, and has conducted workshops on low-income restructuring and energy efficiency issues in over 20 states, including Washington, Hawaii, Nevada, Kansas, Michigan, Rhode Island, California, Virginia, and New Orleans. In the energy efficiency area, Mr. Crandall has analyzed and proposed modifications to utility demand-side programs in the states of Arizona, Georgia, Hawaii, Illinois, Maine, Michigan, Minnesota, North Carolina, Ohio, Pennsylvania, Utah, Washington State, California, Iowa, Montana, Colorado, Missouri, Virginia, Wisconsin, and Washington D.C.

Prior to joining MSB, Mr. Crandall was employed by the Michigan Public Service Commission from 1974 through 1989, where he served as the Director of the Demand-Side Management Division. He was responsible for the development, implementation and monitoring of government- and utility-sponsored demand-side management, energy-efficiency and conservation policies and programs. These activities involved customers in the residential, commercial, industrial and institutional sectors. He was responsible for both pilot and full-scale programs, and conducted demand-side program design and implementation. Mr. Crandall is familiar with marketing strategies, segmentation and market-penetration analyses, as well as the implementation of successful demand-side programs.

Mr. Crandall has dealt with a wide variety of regulatory issues beyond energy conservation, including utility diversification, non-traditional regulatory concepts, incentive regulation, utility billing practices, utility power plant maintenance and management of plant outages.

Mr. Crandall served as Chair of the NARUC Energy Conservation Staff Subcommittee from 1986-1989. He has lectured and made presentations to many groups on demand-side programs and least-cost planning, including two NARUC-sponsored least-cost planning conferences; the 1990 NARUC Regional Workshops on Least-Cost Utility Planning in Newport, Rhode Island and Little Rock, Arkansas; the Wisconsin Public Service Commission's Integrated Resource Planning Workshop; the 1988, 1989, and 1990 Michigan State University Graduate School of Public Utilities and the U.S. Department of Energy.

Mr. Crandall has testified before the: United States Congress, Michigan Legislature, Michigan Public Service Commission, North Carolina Utilities Commission, Public Service Commission of the District of Columbia, Illinois Commerce Commission, Maine Public Utilities Commission, Massachusetts Department of Public Utilities, Public Service Commission of Hawaii, Minnesota Public Service Commission, Iowa Public Service Commission, Georgia Public Service Commission, Public Utility Commission of Ohio, Virginia Public Service Commission, Wisconsin Public Service Commission, and the City Council of the City of New Orleans, Louisiana.

Mr. Crandall has written several articles published in the Public Utilities Fortnightly and Electricity Journal, Natural Gas Magazine, and a number of proceedings for the Biennial Regulatory Information Conference and the American Council for an Energy-Efficient Economy.

TESTIMONY

Case No. U-5531, (8/77), Consumers' Power Company electric rate increase application. Mr. Crandall served as the Staff Witness and recommended that the Applicant initiate the Residential Electric Customers' Information program.

Case No. U-6743, (3/81), Michigan Consolidated Gas Company. Mr. Crandall served as the Staff policy witness and recommended that the Commission approve a surcharge to cover all reasonable and prudent costs associated with Applicant's implementation of the Michigan Residential Conservation Services Program.

Case No. U-6819, (6/81), Michigan Power Company-Gas. Mr. Crandall served as the Staff policy witness and described the basis for the program and the expected level of activity, recommending that the Commission approve a surcharge to cover all reasonable and prudent costs associated with Applicant's implementation of the Michigan Residential Conservation Service Program.

Case No. U-6787, (6/81), Michigan Gas Utilities Company. Served as the Staff policy witness and described the basis for the program and the expected level of activity, recommending that the Commission approve a surcharge to cover all reasonable and prudent costs associated with the implementation of the Michigan Residential Conservation Service Program.

Case No. U-6820, (6/81), Michigan Power Company-Electric. Served as the Staff policy witness and reviewed the Applicant's request to operate the Michigan Residential Conservation Service Program. Although not mandated by federal law, Applicant chose to operate the program in conjunction with its other services offered to residential gas customers. Recommended the establishment of a surcharge to cover all reasonable and prudent costs associated with the operation of that program.

Case No. U-5451-R (10/82), Michigan Consolidated Gas Company. Served as the Staff policy witness and described the Staff's position regarding Applicant's proposed adjustment of surcharge level. Recommended that the eligibility criteria for customers be adjusted to more accurately reflect proper fuel consumption and to include customers who would be likely to realize a seven-year return on their investment by installing flue-modification devices in conjunction with Applicant's financing program.

Case No. U-6743-R, (10/82), Michigan Consolidated Gas Company. Served as the Staff policy witness regarding the Applicant's proposed expenses and revenues, as well as the reasonableness of activity and expense levels in the company's projected period.

Case No. U-7341 (12/84), Detroit Edison Company, Request for Authority for Certain Non-Utility Business Activities. Represented the Staff's position during settlement discussions and sponsored the settlement agreement.

Case No. U-6787-R, (3/84), Michigan Gas Utilities Company. Served as the Staff witness regarding the Applicant's proposed expenses and revenues. This also included a review of the company's future expenses associated with the Energy Assurance Program, the Specialized Unemployed Energy Analyses, and the Michigan Business Energy Efficiency Program expenses.

Case No. U-8528, (3/87), Commission's Own Motion on the Costs, Benefits, Goals and Objectives of Michigan's Utility Conservation Programs. Represented the Staff on the costs and savings of conservation programs and the other benefits of existing programs, and described alternative actions available to the Commission relative to future energy-conservation programs and services and other conservation policy matters.

Case No. U-8871, et al., (4/88), Midland Cogeneration Venture Limited Partnership. For approval of capacity charges contained in a power-purchase agreement with Consumers' Power Company. Served as the Staff witness on Michigan conservation potential and reasonably achievable programs that could be operated by Consumers' Power

Company, and testified to the potential impact of these conservation programs on the Company's request for use of its converted nuclear plant cogeneration project. Also recommended levels of demand-side management potential for the commercial, industrial and institutional sectors in Consumers' Power service territory.

Case No. U-9172, (1/89), Consumers' Power Company, Power-Supply Cost-Recovery Plan and Authorization of Monthly Power-Supply Cost-Recovery Factors for 1989. Served as Staff witness on the conservation potential and reasonably achievable programs that could be operated by Consumers' Power Company. Testified to the potential impact of these conservation programs on the Company's fuel and purchase practices, its five-year forecast and the fuel factor. Recommended levels of demand-side management potential for the commercial, industrial and institutional sectors in Consumers' Power service territory as an offset to its more-expensive outside and internally generated power. Suggested that CPCO vigorously pursue conservation, demand-side management research, and planning and program implementation.

Case No. U-9263, (4/89), Consumers' Power Company Request to Amend its Gas Rate Schedule to Modify its Rule on Central Metering. Served as a Staff witness on the conservation effect of converting from individual metered apartments to a master meter. Suggested that the Commission continue its moratorium on the master meters, due to the adverse energy-conservation and efficiency impact.

Case No. E-100 (1/90) North Carolina Public Service Commission proceeding on review of the Duke Power Company's least-cost utility plan. Testified on behalf of the North Carolina Consumers' Council regarding utility energy-efficiency and demand-side management programs and the concept of profitability and implementation of demand-side management programs.

Case No. 889 (1/90) Public Service Commission of the District of Columbia. Testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates (general rate case). Sponsored testimony regarding the design and implementation and overall appropriateness of PEPCO's existing and proposed energy-efficiency and conservation programs.

Case No. 889 (4/90) Public Service Commission of the District of Columbia. Provided supplemental direct testimony and testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates (general rate case). Offered supplemental testimony regarding a more detailed review of PEPCO's existing pilot and full-scale energy-efficiency and conservation programs. Offered suggestions and recommendations for a future direction for PEPCO to pursue in order to implement more cost-effective and higher-impact energy-efficiency and conservation programs.

Case No. ICC Docket 90-004 and 90-0041 (6/90) Illinois Commerce Commission proceeding to adopt an electric-energy plan for Central Illinois Light Company (CILCO). Testified on behalf of the State of Illinois, Office of Public Counsel and the Small-Business Utility Advocate. Reviewed the CILCO electric least-cost plan filing and the conservation and load-management programs proposed in its filing. Sponsored testimony regarding my analysis of the proposed programs, and offered alternative programs for the Company's and the Commission's consideration.

Case No. D.P.U. 90-55 (6/90) Commonwealth of Massachusetts Department of Public Utilities. Testified on behalf of the Commonwealth of Massachusetts, Division of Energy Resources. Reviewed and analyzed Boston Gas' proposed energy-conservation programs that were submitted for pre-approval in its main rate case. In addition, suggested that it might consider implementation of other natural-gas energy-efficiency programs, and not award an economic incentive for energy-efficiency and conservation programs until minimum program-implementation standards are satisfied.

Case No. U-9346 (6/90) Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency Association. Reviewed and analyzed the Consumers' Power Company rate-case filing related to energy-efficiency and demand-side management programs. Proposed alternative energy-efficiency programs and recommended program budgets and a cost-recovery mechanism.

Case No. 89-193; 89-194; 89-195; and 90-001 (6/90) Maine Public Utilities Commission. Testified on behalf of the Maine Public Advocate's Office. Reviewed the appropriateness of Bangor Hydro-Electric Company's existing energy-efficiency and demand-side management programs in the context of BHE's main rate case and request for

approval to construct the Basin Mills Hydro-Electric dam. Reviewed the overall resource plan and suggested alternative programs to strengthen the energy-efficiency and demand-side management resource efforts.

Case No. 6617 (4/91) Hawaii Public Utility Commission. Testified on behalf of the Hawaii Division of Consumer Advocacy. Described what demand-side management resources are, why they should be included in the integrated resource planning process, and proposed the implementation of several pilot projects in Hawaii along with guidelines for the pilot programs.

Case No. E002/GR-91-001 (5/91) Minnesota Public Utilities Commission. Testified on behalf of Minnesotans for an Energy Efficient Economy. Assessed the DSM programs being operated or proposed by Northern States Power Company and made recommendations as to ways in which NSP could improve its DSM efforts.

Case No. 905 (6/91) Public Service Commission of the District of Columbia. Testified on behalf of the District of Columbia Energy Office. Responded to the energy-efficiency and load management aspects of Potomac Electric Company's filing and made several recommendations for DC-PSC action.

Case No. 6690-UR-106 (9/91) Public Service Commission of Wisconsin. Testified on behalf of The Citizens' Utility Board of Wisconsin. Assessed the DSM programs being operated or proposed by the Wisconsin Public Service Corporation, made recommendations as to the WPSCO energy efficiency programs, and suggested ways the company could improve its DSM efforts.

Case No. E002/CN-91-19 (12/91) Minnesota Public Utilities Commission. Testified on behalf of Minnesota Department of Public Service. Assessed the DSM potential and programs being operated or proposed by Northern States Power Company and made recommendations as to the potential for energy efficiency in the NSP service territory and ways in which NSP could improve its DSM efforts.

Case No. 912 (4/92) Public Service Commission of the District of Columbia. Testified on behalf of the Government of the District of Columbia in the Potomac Electric Power Company's application for an increase in its retail rates for the sale of electric energy. Testified regarding the reasonableness of DSM and EUM policy changes, the cost allocation of the DSM and EUM expenses, an examination of the prudence of management regarding the energy-efficiency programs, and an examination of the appropriateness of the costs associated with energy-efficiency programs.

Case No. PUE 910050 (5/92) Virginia State Corporation Commission. Testified on behalf of the Citizens for the Preservation of Craig County regarding the need for the Wyoming-Cloverdale 765 kV transmission line. Specifically, addressed the adequacy of the DSM planning of Appalachian Power Company and Virginia Power/North Carolina Power. Made recommendations as to APCO and VEPCO's energy efficiency programs, and suggested ways the company could improve its DSM efforts.

Case EEP-91-8 (5/92). Iowa Utilities Board. Testified on behalf of the Izaak Walton League concerning the adequacy of Iowa Public Service Company's Energy Efficiency Plan. Reviewed the plan and suggested modifications to it.

Case No. 4131-U and 4134-U (5/92). Georgia Public Service Commission. Testified on behalf of the Georgia Public Service Commission staff regarding the demand-side management portions of Georgia Power Company's and Savannah Electric and Power Company's Integrated Resource Plans. Testimony demonstrated that it is reasonable for the Commission to expect that the utilities can successfully secure substantial amounts of demand-side management resources by working effectively with customers.

Case 917 (8/92). Public Service Commission of the District of Columbia. Testified on behalf of the District of Columbia Energy Office in hearings on Potomac Electric Power Company's Integrated Resource Planning process. Addressed a number of program-specific issues related to PEPCO's demand-side management efforts.

Case No. 4132-U, 4133-U, 4135-U, 4136-U (10/92). Georgia Public Service Commission. Testified on behalf of the Staff Adversary IRP Team of the Georgia PSC. Provided a critique of Georgia Power Company's and Savannah Electric and Power Company's proposed residential and small commercial DSM programs.

Case No. 4135-U (3/93). Georgia Public Service Commission. Testified on behalf of the Staff Adversary IRP Team of the Georgia PSC. Provided a critique of Savannah Electric and Power Company's proposed Commercial and Industrial DSM programs.

Case No. R-0000-93-052 (12/93). Arizona Corporation Commission. Testified on behalf of the Arizona Community Action Association. Critiqued and made recommendations regarding the integrated resource plans and demand-side management programs of Arizona Public Service Company and Tucson Electric Power Company.

Case No. 934 (4/94). Public Service Commission of the District of Columbia. Filed testimony on behalf of the District of Columbia Energy Office in hearings concerning the Washington Gas Light Company (WGL) general rate case application to increase existing rates and charges for gas service. Testimony involved critiquing and reviewing WGL's least cost planning efforts and integration of DSM, marketing and gas supply efforts.

Case No. U-10640 (10/94). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency Association concerning the need to integrate DSM and load promotion analysis into MichCon's GCR planning process.

Case No. 05-EP-7 (3/95). Wisconsin Public Service Commission. Testified on behalf of the Citizens' Utility Board on level of utility DSM and program designs and strategies.

Case No. 05-EP-7 (3/95). Wisconsin Public Service Commission. Testified on behalf of the Wisconsin Community Action Program Association on low-income customers and utility DSM programs.

Case No. TVA 2020-IRP (9/95). Tennessee Valley Authority. Testified on behalf of the Tennessee Valley Energy Reform Coalition. Assessed, critiqued and made recommendations regarding the integrated resource plans and demand-side management programs proposed by the Tennessee Valley Authority.

Case No. R-96-1 (10/95). Alaska Public Utilities Commission. Testified on behalf of the Alaska Weatherization Directors Association regarding the proposed standards and guidelines for integrated resource planning and energy efficiency initiatives under consideration in Alaska.

Case No. D95.9.128 (2/96). Montana Public Service Commission. Testified on behalf of the District XI Human Resources Council concerning the low-income energy efficiency programs offered by the Montana Power Company.

Case No. DPSC Docket No. 95-172 (5/96). Delaware Public Service Commission. Prepared draft testimony on behalf of the Low-Income Energy Consumer Interest Group regarding Delmarva Power & Light Company's application to revise its demand-side programs. The case was settled, with LIECIG obtaining funding for low-income energy efficiency programs, prior to testimony.

Case No. U-11076 (8/96). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Jobs Commission's recommendations regarding electric and gas reform. Discussed the implications of utility restructuring and the needs of residential and low-income households, and proposed regulatory and industry solutions.

Case No. 96-E-0897 (3/97). New York Public Service Commission. Prepared draft testimony for New York's Association for Energy Affordability regarding the impact of proposed utility restructuring plans on low-income customers. The case was settled in Spring 1997.

Case No. R-00973954 (7/97). Pennsylvania Public Utilities Commission. Testified on behalf of the Commission on Economic Opportunity regarding the economics of demand-side measures and programs proposed for implementation by Pennsylvania Power & Light Company.

Case No. 98-07-037 (7/98) California Public Utilities Commission. Testified on the California Alternative Rates for Energy and the Low Income Energy Efficiency programs regarding the implementation and adoption of revisions to these programs necessitated by the AB 1890 and the Low Income Governing Board.

Case No. U-12613 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Public Service Corporation application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12649 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Electric Power Company and the Edison Sault Electric Company application to implement PA 141 Michigan's electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12651 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Northern States Power Company – Wisconsin application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12652 (3/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Indiana Michigan Power Company d/b/a American Electric Power application to implement PA 141 the electricity deregulation law. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management.

Case No. U-12725 (4/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Wisconsin Electric Power Company and the Edison Sault Electric Company application to increase its residential rates. I reviewed the portions of the filing related to their provision of electric energy efficiency and load management and recommended a significant increase in these activities.

Case No. U-13060 (12/01). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application for Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed GCR factor and suggested continuation of the existing GCR factor or adopt an adjusted MCAA sponsored GCR factor. I also suggested a set-aside allocation be designated for low-income customers to ensure access to alternative gas providers under the applicant's customer choice program.

Case No. 6690-UR-114 (9/02). Wisconsin Public Service Commission. Testified on behalf of the Citizens Utility Board regarding the Wisconsin Public Service Corporation application to increase its electric and natural gas rates. I reviewed the portions of the filing related to their low-income assistance/weatherization and the proposed executive compensation incentive plan.

Case No. U-14401 (04/05). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application for Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed plan and suggested initiation of strategies that would lower the need to acquire expensive and unnecessary gas supplies.

Case No. U-14401-R (10/05). Michigan Public Service Commission. Testified on behalf of the Michigan Community Action Agency regarding the Michigan Consolidated Gas Company application re-opener Approval of their Gas Cost Recovery Plan and Five-Year gas Forecast. I reviewed the filing and recommended the Commission reject the proposed plan and suggested initiation of strategies that would lower the need to acquire expensive and unnecessary gas supplies.

Case No. U-14701 (02/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding the Consumers Energy Company application for Approval of a Power Supply Cost Recovery Plan and for Authorization of Monthly Power Supply

Cost Recovery Factors for Calendar Year 2006. I reviewed the filing including the application, testimony, exhibits, discovery responses and submitted testimony recommending that the Commission not approve the five-year PSCR plan as filed due to the impacts related to the Palisades sale and the absence of alternative resources in the projected five-year resource portfolio.

Case No. U-14702 (02/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Detroit Edison Company application for authority to implement a Power Supply Cost Recovery Plan in its rate schedules for 2006 metered jurisdictional sales of electricity. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the proposed five-year PSCR plan as filed due because it was deficient in its selection of alternative resources in the projected five-year resource portfolio.

Case No. U-14992 (12/06) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Consumers Energy Company application for approval of the proposed Power Purchase Agreement in connection with the sale of the Palisades Nuclear Power Plant and other assets. The purpose of my testimony was to address the overall soundness of this application and proposal. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the proposed purchase power agreement and transfer the ownership of the nuclear plant and other assets.

Case No. 06-0800 Illinois Commerce Commission (3/07). Provided testimony on behalf of the Illinois Citizens Utility Board regarding the Illinois electricity resource auction process. I assessed the existing resource/power supply auction based bidding process and recommended modifications and improvements to the Illinois resource acquisition mechanism.

Case No. 24505-U (5/07). Georgia Public Service Commission. Testified on behalf of the Georgia Public Service Commission Advocacy staff regarding the demand-side management portions of Georgia Power Company's Integrated Resource Plans. Testimony demonstrated that it is reasonable for the Commission to approve the five proposed DSM programs and expect that Georgia Power can successfully secure considerably more demand-side management resources by working effectively with its customers.

Case No. U-14992 (11/07) Michigan Public Service Commission. Testified on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Consumers Energy Company rate application for approval a rate increase and the recovery of energy efficiency programs and certain costs in connection with the sale of the Palisades Nuclear Power Plant and other assets. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission not approve the recovery of transaction costs involving the transfer the ownership of the nuclear plant and other assets and on various aspects of its proposed energy efficiency programs and proposed incentives.

Case No. 07-0540 (12/07) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Commonwealth Edison Company application for approval of its proposed Energy Efficiency and Demand Response Plan. I assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. 07-0539 (12/07) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Central Illinois Light Company d/b/a and Ameren CIPS CENTRAL ILLINOIS PUBLIC SERVICE COMPANY and Ameren CIPS ILLINOIS POWER COMPANY d/b/a Ameren IP application for approval of its proposed Energy Efficiency and Demand Response Plan. I assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. U-15415 (2/08) Michigan Public Service Commission. Testified on behalf of the American Association of Retired People regarding The Consumers Power Company application for approval for authority to implement a Purchase Power recovery plan, 5-year forecast, and monthly PSCR factors for the 12-month period calendar year 2008. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the

Commission adopt a more effective and less expensive resource acquisition procedure to help keep the cost of energy down in Michigan.

Case No. U-15417 (4/08) Michigan Public Service Commission. Provided testimony on behalf of the American Association of Retired People regarding The Detroit Edison Company for Authority to Implement a Power Supply Cost Recovery Plan in its Rate Schedule for 2008 Metered Jurisdictional Sales of Electricity. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission adopt a more effective and less expensive resource acquisition procedure to help keep the cost of energy down in Michigan.

Case No. U-15244 (7/08) Michigan Public Service Commission. Provided testimony on behalf of the Michigan Environmental Council and The Public Interest Group In Michigan regarding The Detroit Edison Company request for Authority to increase rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority. I reviewed the application, testimony, exhibits and submitted testimony that recommended that the Commission direct DECO to make modifications to its Integrate Resource Planning analysis.

Case No. EEP-08-2 (7-08) Iowa Public Utilities Board. Provided testimony on behalf of the environmental interveners regarding the request of the Mid American Energy Company for approval of an Energy Efficiency Plan. I made an assessment of the proposed energy efficiency and demand response plan and recommended modifications and improvements to the implementation strategy and proposed programs.

Case No. EEP-08-1 (8-08) Iowa Public Utilities Board. Provided testimony on behalf of the environmental interveners regarding the Interstate Power and Light Company request for approval of an Energy Efficiency Plan. I made an assessment of the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed programs and implementation strategy.

Case No. 137-CE-147 (2-09) Public Service Commission of Wisconsin. Provided testimony on behalf of PRESERVE OUR RURAL LANDS regarding the Application of American Transmission Company, as an Electric Public Utility, to Construct a new 345 kV Line from the Rockdale Substation to the West Middleton Substation, Dane County, Wisconsin. I suggested modifications of the proposal and rejection of the approval of the line.

Case No. M2009-2093218 (8-09) Pennsylvania Public Utility Commission. Provided testimony on behalf of The Office Of Consumer Advocate regarding the West Penn Power Company d/b/a Allegheny Power Energy Efficiency and Conservation Plan request for plan approval. I analyzed the proposed plan and made an assessment of the proposed energy efficiency and demand response and cost recovery plan. I suggested modifications and improvements to the proposed programs as well as the proposed implementation strategy.

Case No. 09-1947-EL-POR, 09-1948-EL-POR, 09-1949-EL-POR, 09-1942-EL-EEC, 09-1943-EL-EEC, 09-1944-EL-EEC, POR, 09-580-EL-EEC, 09-580-EL-EEC, 09-580-EL-EEC Public Utilities Commission of Ohio. Provided testimony on behalf of The Office Of The Environmental Law and Policy Center regarding the Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for approval of their energy efficiency and peak demand reduction program portfolio and associated cost recovery mechanism and approval of their initial benchmark reports and in the matter of the energy efficiency and peak demand reduction programs. I reviewed, analyzed and assessed the appropriateness of the proposed plans, benchmark reports and proposed peak reduction program portfolio. I suggested modifications and improvements to the proposed programs. I also made recommendations regarding the proposed implementation strategy as well as accounting and program cost tracking.

Case No. U-16412 (10/10) Michigan Public Service Commission. Provided testimony on behalf of the Natural Resources Defense Council, Michigan Environmental Council and The Environmental Law and Policy Center regarding the Consumers Energy Company request to amend its natural gas & energy efficiency Energy Optimization Plan. I reviewed the application, testimony, exhibits, discovery responses and submitted testimony that recommended modifications to the proposed Energy Optimization Plan.

Case No. 10-0570 (11/10) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Commonwealth Edison Company application for approval of its proposed Energy Efficiency and Demand Response Plan. Assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. 10-0568 (11/10) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Central Illinois Light Company d/b/a and Ameren CIPS CENTRAL ILLINOIS PUBLIC SERVICE COMPANY and Ameren CIPS ILLINOIS POWER COMPANY d/b/a Ameren IP application for approval of its proposed Energy Efficiency and Demand Response Plan. Assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. 10-0564 (11/10) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the People’s Gas Light and Coke Company and North Shore Gas Company request for approval of its proposed Energy Efficiency Plan. Assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. 10-0567 (11/10) Illinois Commerce Commission. Provided testimony on behalf of the Environmental Law and Policy Center regarding the Northern Illinois Gas Company application for approval of its proposed Energy Efficiency Plan and approval of Rider 30, Energy Efficiency Plan Cost recovery and related changes to Nicor tariffs. Assessed the proposed energy efficiency and demand response plan and recommended modifications and improvements to the proposed plan filing.

Case No. M2010-2210316 (3-11) Pennsylvania Public Utility Commission. Provided testimony on behalf of The Office Of Consumer Advocate regarding the UGI – Electric Energy Efficiency and Conservation Plan request for plan approval. I analyzed the proposed plan and made an assessment of the proposed energy efficiency and demand response and cost recovery plan. I suggested modifications and improvements to the proposed programs as well as the proposed implementation strategy.

In addition, I have served the following public sector clients since 1990.

Client	Nature of Service
Alaska Housing Finance Corporation	Analysis of energy efficiency, system planning and applicability of EPAct standards to Alaska resource selection process.
California Low Income Governing Board	In conjunction with AB 1890 the state’s restructuring statute provided analyses of options to deliver energy efficiency and assistance programs to low-income households in a restructured utility environment. Assisted the CPUC and Low Income Governing Board in developing low-income energy assistance and energy efficiency programs, implementation methods and procedures under interim utility administration.
Conservation Law Foundation of New England	Provided technical support to the collaborative working groups with Boston Edison, United Illuminating, Eastern Utilities Association, and Nantucket Electric regarding system planning approaches, energy efficiency programs and resource screening.
District of Columbia Energy Office	Analysis of DC Natural Gas' and PEPCo's integrated resource planning and demand side management programs.
District of Columbia Public Service Commission	Testimony regarding demand-side management, least cost planning principles.

Germantown Settlement, Philadelphia	Analysis and technical support regarding business structure and market to aggregate load and/or provide energy efficiency and energy assistance services to low-income households.
Hawaii Division of Consumer Advocacy	Developed demand-side management programs and integrated resource planning rules.
Iowa Department of Natural Resources	Developed and implemented workshops to train building operators and architects in energy efficiency and renewable energy resource opportunities.
Public Interest Research Group In Michigan	Principal investigator and project manager for the "Lessons Learned: Michigan Electricity Restructuring Report"
Maryland Public Service Commission	Reviewed demand-side management programs and impact and process evaluation methods and suggested improvements.
Massachusetts Division of Energy Resources	Analysis of Boston Gas Co. integrated resource plans and residential energy efficiency programs. Analysis of Boston Gas's commercial and industrial energy efficiency programs
City of New Orleans	Developed least cost planning rules, guided a public working group to develop demand-side programs, and developed a low income, senior citizens energy efficiency program.
Oak Ridge National Laboratory	Prepared an economic analysis of the customer impact from various electricity restructuring configurations for the State of Ohio
Ohio Office of Consumer Council	Analyzed two utilities' long-range plans and energy efficiency resource options. Analyzed the Dominion East Gas Company application to be relieved of the merchant function.
Ontario Energy Board	Developed demand-side management programs and evaluated need for natural gas integrated resource planning rules.
Pennsylvania Office of Consumer Advocate	Evaluated demand-side management programs for several electric utilities.
Upper Peninsula Power Company	Provided technical training, technical and achievable energy efficiency potential analysis and developed a specific and geographically tailored low income, senior citizens energy efficiency program.
U.S. Environmental Protection Agency	Developed handbook, "Energy Efficiency and Renewable Energy: Opportunities from Title IV of the Clean Air Act", which focuses on how energy efficiency and renewables relate to acid rain compliance strategies.
U.S. Environmental Protection Agency and U.S. Department of Energy	Analyzed and compared utility supply- and demand-side resource selection for Clean Air Act compliance on the Pennsylvania-New Jersey-Maryland (PJM) interconnection.
Utah Department of Commerce	Analysis of the PacifiCorp proposed Demand-Side Management Tariff Schedule.
Vermont Public Service Board	Analysis of the prudence of Green Mountain Power's planning and management of the Hydro-Quebec power purchase.
Washington State Weatherization Directors	Natural Gas energy conservation program design involving Cascade Natural Gas Company

APPENDIX B: CETF PROPOSED WORK PLAN AND BUDGET

Proposed Scope of Work – Legal Representation

CETF is in need of funding for this intervention. Unlike the other organizational intervenors, CETF is not receiving compensation under the PSC’s general Intervenor Compensation program. CETF intervened in the Minnesota Certificate of Need and participated by hiring an attorney and spending significant funds such that the organization is now without resources to participate in the Wisconsin CPCN proceeding. What funds that CETF has, just over \$1,000.00, will be utilized in support of this intervention.

CETF is seeking intervenor compensation for the expenses of intervention, consultants, and 2/3 of the cost of attorneys fees, as itemized below. CETF will benefit from an in-kind donation of legal services, as proposed by NoCapX 2020 in its Intervenor Compensation request. In past practice, NoCapX has received an in-kind donation of legal services, and the joint intervenors have covered all the expenses of intervention, consultants, contract clerical and 2/3 of the cost of attorneys fees, and the remaining 1/3 of the costs of legal representation are donated by Carol Overland, Legalectric. The time allotted for tasks has been altered to reflect that some of this work has been completed.

Budget for Attorney Fees - Carol A. Overland, Attorney for CETF at \$185/hr:

Task	Hours	Dollars
Review Application & docket filings, issue identification, and monitoring docket throughout	18	3,300
Research WI statute & rules; transmission issues for this proceeding (i.e., MISO reports, utility studies, FERC dockets)	9	1,665
Discovery – Prepare Discovery and review those of others, review answers	15	2,775
Review DEIS & Draft Comments	10	1,850
Draft Testimony – Work with witnesses on Direct, Rebuttal, Surrebuttal & prepare exhibits	35	6,475
Testimony of Others – review testimony & exhibits	10	1,850
Cross-Examination – Prep and prefile per Order	15	2,775
Public Hearings 8hr/2days	16	2,960
Technical Hearing in Madison – week of March 5 11hr/5 days (hearing and daily prep)	55	10,175
Initial & Reply Briefs, review record	46	8,510
Review & respond to staff Memorandum	12	2,220
Consultation with other parties	18	3,330
Motion practice, i.e. Discovery (if necessary)	8	1,480
Total:	267	46,365
CETF Intervenor Compensation Request (2/3):		30,930

Two CETF Board members will serve as staff and participate in the proceeding on behalf of CETF. Duties include DEIS review and comments, review of application and testimony, preparation for the technical hearings, participation in technical hearings and public hearings.

Budget for assistance of CETF Board member George Nygaard at \$25/hr totaling \$6,250.00. C.V. of George Nugaard attached

Task	Hours	Dollars
Review Application & docket filings, issue identification, and monitoring docket throughout	35	875.00
Discovery – Prepare Discovery and review those of others, review answers	35	875.00
Review DEIS & Draft Comments	20	500.00
Draft Testimony – Work with witnesses on Direct, Rebuttal, Surrebuttal & prepare exhibits	15	375.00
Testimony of Others – review testimony & exhibits	20	500.00
Prep for technical hearing	15	375.00
Public Hearings 8hr/2days	16	400.00
Assist Attorney at Technical Hearing in Madison March 5-9 11hr/5 days (hearing & daily prep)	40	1000.00
Assist with Initial & Reply Briefs, review record	50	1250.00
Assist with response to staff Memorandum	15	375.00
Motion practice, i.e. Discovery (if necessary)	8	200.00
Totals	269	6725.00

CETF’s Reimbursable Expenses:

Printing, copying and mailing: \$1,500.00 (color copies additional expense)
 Travel: \$330.00 x2 Overland, RW to Madison per trip (Prehrg Conf.; Tech. Hrg)
 \$110.00 x2 Nygaard, LaCrosse to Madison per trip (Prehrg Conf.; Tech Hrg)
 \$880.00 total travel
 Lodging: \$ 65/night x 2 = \$130 for 5 nights = \$650
 Per Diem: \$25.00 x 5 = \$125.00 x 2 = \$250.00

\$1,500.00	Printing
\$ 880.00	Travel
\$ 650.00	Lodging
<u>\$ 250.00</u>	Per Diem
\$ 3,280.00	Reimbursable Expense

George Nygaard
S2126 Wing Hollow Road
Chaseburg, WI 54621
608-483-2693
gnygaard@mwt.net

Education

B.S. Degree Sociology University of Wisconsin-La Crosse

Experience

State Certified Asbestos Inspector Wisconsin, Minnesota and Iowa
State Certified Asbestos Supervisor Wisconsin and Minnesota
State Certified Lead Inspector and Risk Assessor Wisconsin
Trainer for OSHA and EPA Regulations and Safe Work Methods
Employed with Midwest Environmental Management Co. La Crosse WI
1997-2006

State Certified Home Inspector Wisconsin
State Certified Rental Weatherization Inspector Wisconsin
Employed with Solberg Home Inspections, La Crosse Area 1988-1995
Self-employed Nygaard Home Inspections, La Crosse Area 1995-1997

Regional Weatherization Coordinator
Coulee Community Action Program Westby, WI
Managed La Crosse satellite facility with warehouse and 16 employees
Performed Work Order and Followup Inspections

Course Work

Aviation Radar Electronics USMC
Evening Wood Shop and Solar Heating Courses WWTC
Continuing Education Courses in Construction, HVAC, Electrical and
Plumbing American Society of Home Inspectors
Continuing Education Courses for Asbestos Inspection and Supervision

Computer Skills

Word and Excel, Word Perfect. Limited Simple CAD work, Internet

Activities & Memberships

Coulee Region Energy Coalition
Intervenor at NRC - Operating License for LaCrosse Bioling Water Reactor
CRED Energy Fair
Submission of HUD block grant for energy audits
Citizens Utility Board - Member First Elected Board of Directors – 3rd CD 1980
American Society of Home Inspectors - 1992
LaCrosse People's Food Coop - Founding member, President Bd of Directors
Member of the Vietnam Veterans of America, Chapter #114

Budget for Ruth Chipps, 80 hours @ \$95/hr totaling \$7600.00

Activities below are related to the proceedings and intervention process. They are not membership development activities.

Task Hours and Details:

Task	Hours	Dollars
Review Application & docket filings	12	\$1140
Research, prepare, develop displays for commission proceedings	15	\$1425
Work with staff on content for displays and approval process for proceedings.	10	\$950
Execute initiatives related to displays and information distribution related to proceedings, public hearings	15	\$1425
Develop/execute other activities related to intervention.	10	\$950
Assist staff/committee on preparing responses for intervention	18	\$1710
TOTAL:	80	7600.00

Total: 80 hours at \$95 = \$7600.00

Ruth Chipps Bio

Ruth Chipps joined CETF in Sept. 2008. She has over 15 years experience in communications, education and media. Content developer, subject matter expert and writer specializing in sustainable energy approaches and healthy living.

Additional skills: business development, marketing, community action and information technology.

Duties include informing and mobilizing members to participate in the Public Hearings and DEIS Comments and the general community on the status of the power line proposal and developing educational initiatives and displays that inform and promote engagement.

Materials/Supplies Expenses

Expenses related to supplies and materials, content placement, technology and printing for displays and other activities related to intervention.

Printing and materials: \$3,000.00

Technology: \$2,000.00 – Preparation of visual & video materials.

Travel: \$110.00 (to and from Madison x1)

Lodging: \$325.00 (5 nights for hearing)

PerDiem: \$25 x 5 = \$125.00

Total: \$5,525.00

CETF Attachment C – FINANCIAL INFORMATION

APPENDIX C: CETF AUDIT REPORT

Not Applicable – Due to small budget, CETF does not perform an audit.

APPENDIX D: CETF LOBBY REPORT

Not Applicable – CETF has no lobbying time or expenses in Wisconsin

APPENDIX E: CETF 2020 12 MONTH IC SUMMARY

Not Applicable – CETF has received no Intervenor Compensation over the last 12 months, is not participating in other PSC dockets, and does not anticipate any other applications for Intervenor Compensation.

APPENDIX F: CETF ASSET AND LIABILITY STATEMENT

Not Applicable – CETF has \$ 760.87 in its checking account which will be devoted to the intervention, as will any subsequent donations.

APPENDIX G: CETF 2011 BUDGET

The 2011 Budget of CETF is outlined in detail in Appendix A and Appendix B. There are no other anticipated expenses. Revenue anticipated is limited to Intervenor Compensation and 1/3 of attorneys fees donated by Carol A.Overland.

APPENDIX H: CETF STAFF

Not Applicable – CETF has no staff. Thus far, Board members have done what staff work was necessary without compensation. George Nygaard and Ruth Chipps will handle staff duties during the intervention.

APPENDIX I: CETF Board of Directors

CETF's Secretary of State File Number is 2838737-2.

Federal ID number is 30-0480091.

Registered Office Address: CETF
 c/o Joseph M. Morse
 23375 Buffalo Ridge Road
 Winona, MN 55987-6064.

The members of the CETF Board of Directors are:

Joseph M. Morse - President	Winona, MN
R. Jean Salk -Treasurer	La Crosse, WI
Irving Balto	Chaseburg, WI
George R. Nygaard	Chaseburg, WI
Linda Van Art	La Crosse, WI
Guy Wolf	Stoddard, WI
Antoinette Yeske	Mindoro, WI

Mississippi River Revival

CETF utilizes Mississippi River Revival as its fiscal agent.

Mississippi River Revival’s federal ID number is 36-3291935, and its address is P.O. Box 315, Winona, MN 55987. More The members of the Mississippi River Revival Board of Directors are:

Polly Gower, President	Kay Peterson, Secretary	David Seaman, Treasurer
Solomon Simon, director	Julia Crozier, Director	Joseph Morse, Director
Michael Munson, Director	Lynda Horness, Director	Richie Swanson, Director
Barbi Bell, Director		

The mission of Mississippi River Revival is to “provide environmental education to the public with regard to the Mississippi River and its watershed and to facilitate clean-up activities.” Mississippi River Revival’s IRS Form 990s are available online at www.guidestar.org, search for Mississippi River Revival.