

MARK D. YOUNGER

Mr. Younger is President of Hudson Energy Economics, LLC and has forty years of experience in energy analysis.

EDUCATION

MBA, Cornell University, 1983

M.E., Operations Research
Cornell University, 1983

B.S., Engineering, Major - Operations Research
Cornell University 1981

PROFESSIONAL EXPERIENCE

President

Hudson Energy Economics, LLC (2012 - Present)

Specialist on electric deregulation, market structure issues and deregulated electric energy, ancillary service and capacity market design. Involved as an active participant in the working groups refining the New York Independent System Operator, Inc. ("NYISO") market structure and developing methods to improve the market design, including all aspects of its energy, ancillary services and capacity markets.

Vice President

Slater Consulting (1994 - 2012)

Involved as an active participant in the working groups refining the New York Independent System Operator, Inc. ("NYISO") market structure and developing methods to improve the market design, including all aspects of its energy, ancillary services and capacity markets. One of the original architects of New York's capacity demand curve.

Senior Project Manager

Morse, Richard, Weisenmiller & Associates, Inc. (1986-1994)

Responsible for directing MRW's projects on production cost modeling. Prepared extensive analysis and expert witness testimony on avoided costs in California, New York, Pennsylvania and New Jersey. Performed analyses of electric utility emissions reductions associated with cogeneration projects.

Energy Economist

Pacific Gas & Electric Company (1983-1986)

Responsible for developing models and methods for integrated supply and demand-side resource analysis. Developed and performed an analysis of resource planning under uncertainty using Monte Carlo techniques.

Research Specialist for Duane Chapman, Professor of Resource Economics Cornell University (1982-1983)

Formulated the financial simulation section of the University Research Group on Energy's (URGE) integrated model of the electric utility industry. Performed an analysis of the impact on New York Pollution levels and New York utilities of proposed acid rain abatement strategies.

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Affidavits and Testimony

- Affidavit on behalf of the Independent Power Producers of New York on the flaws associated with New York State Electric and Gas and Rochester Gas & Electric Companies' proposal to own solar energy facilities as part of their proposed Low-Income Clean Generation Program and to own battery storage facilities (NY PSC Docket Nos. 22-E-0317, 22-G-0318, 22-E-0319, and 22-G-0320) September 26, 2022.
- Affidavit on behalf of the Independent Power Producers of New York on the flaws associated with Consolidated Edison Company of New York, Inc.'s proposal to own solar energy facilities as part of their proposed Clean Energy Credit for Low-Income Customers Program (NY PSC Docket Nos. 22-E-0064 and 22-G-0065) May 20, 2022.
- Supplemental Affidavit on behalf of the Independent Power Producers of New York on the flaws in the Clean Energy Advocates objections to the NYISO's proposed Marginal Capacity Accreditation (FERC Docket No. ER22-772-000) March 23, 2022.
- Affidavit on behalf of the Independent Power Producers of New York on the benefits of the NYISO's proposal to implement Marginal Capacity Accreditation (FERC Docket No. ER22-772-000) January 26, 2022.
- Affidavit on behalf of the Independent Power Producers of New York on the flaws in the NYISO's proposed revisions to the Buyer-Side Mitigation Part A test (FERC Docket No. ER20-1718-000) May 21, 2020.
- Reply Affidavit on behalf of the Independent Power Producers of New York on the flaws in various parties proposal to greatly expand the NYISO's methodology for calculating the number of allowed MW of Renewable Exemptions from Buyer-Side Mitigation (FERC Docket No. ER16-1404-002) May 13, 2020
- Affidavit on behalf of Helix Ravenswood, LLC on the flaws in the NYISO's methodology for calculating the number of allowed Renewable Exemptions from Buyer-Side Mitigation (FERC Docket No. ER16-1404-002) April 28, 2020.
- Affidavit on behalf of the Independent Power Producers of New York on why the NYISO's estimate of the derate for Duration Limited Resources is consistent with the NYISO's resource adequacy process and should be approved. (FERC Docket No. ER19-2276-000) August 9, 2019.
- Affidavit on behalf of the Independent Power Producers of New York on why allowing Linden VFT and the Hudson Transmission Project to continue to sell capacity in NYISO markets after converting their Transmission Withdrawal Rights from Firm to Non-Firm violates the NYISO and PJM tariffs. (FERC Docket No. EL18-189-000) July 31, 2018.
- Affidavit on behalf of the Independent Power Producers of New York on why allowing Linden VFT and the Hudson Transmission Project to continue to sell capacity in NYISO markets after converting their Transmission Withdrawal Rights from Firm to Non-Firm violates the NYISO and PJM tariffs. (FERC Docket No. EL18-54-000) February 23, 2018.
- Affidavit on behalf of the Independent Power Producers of New York on the dollars that gas local distribution companies would collect annually by charging electric generator gas interruptible transportation customers in New York City a \$0.10 per Dth charge and the cost that would impose on electricity consumers in NYC. (NY PSC Docket No. 17-G-0011)

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- Affidavit on behalf of Roseton Generating, LLC on the inappropriateness of blocking generators located in the NYISO Localities from selling capacity to the ISO-NE market during the 2017-2018 capability year (FERC Docket No. ER16-2451-000) September 23, 2016
- Affidavit on behalf of the Independent Power Producers of New York and the Electric Power Supply Association on the flaws in the NYISO's proposed implementation of a Renewable and Self Supply Exemption (FERC Docket No. ER16-1404-000) May 31, 2016.
- Affidavit on behalf of the Independent Power Producers of New York and the Electric Power Supply Association on the flaws in the NYISO's Information Response on the Deficiencies in Its Analysis of the Need for Uneconomic Retention Mitigation and NYCA wide Uneconomic Entry Mitigation (FERC Docket No. EL13-62-002) January 19, 2016.
- Affidavit on behalf of the Independent Power Producers of New York and the Electric Power Supply Association on the flaws in the NYISO's proposed Reliability Must Run compliance filing (FERC Docket No. ER16-120-000) November 30, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding the flaws in claims that lightly regulated utilities claimed confidential information is already in the public domain and in the harm from releasing such data. (NY PSC Matter No. 13-01288) September 3, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding the flaws in the NYISO Evaluation of the Need for Uneconomic Retention Mitigation in NYCA Rest of State Market. (FERC Docket No. EL13-62-002) July 17, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding the flaws in the NY PSC, NYPA and NYSERDA proposed fundamental revisions to the NYISO's Buyer-Side Mitigation Rules. (FERC Docket No. EL15-64-000) June 29, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding the need to maintain confidentiality for certain data submitted to the New York Public Service Commission by lightly regulated utilities. (NY PSC Matter No. 13-01288) June 17, 2015.
- Affidavit on behalf of the PSEG Companies regarding how market rules that affect price formation have developed within the NYISO and how those rules should be incorporated into PJM Interconnection L.L.C.'s ("PJM") market design. (FERC Docket No. AD14-14-000) March, 6, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding the failure of TDI to show that they Champlain Hudson Power Express should be given a line specific exemption from Buyer-Side uneconomic entry mitigation and the failure of TDI to demonstrate that the existing NYISO tariff's application of mitigation to its project was not Just and Reasonable (FERC Docket No. EL15-33-000), January 15, 2015.
- Affidavit on behalf of the Independent Power Producers of New York regarding flaws in the NYISO's and Transmission Owners proposals for a Competitive Entry Exemption from Buyer-Side uneconomic entry mitigation and the failure of the Transmission Owners to demonstrate that the existing NYISO tariff was not Just and Reasonable (FERC Docket No. EL15-25-000), January 15, 2015.

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- Affidavit on behalf of the Independent Power Producers of New York regarding the flaws in the NYISO's proposal to define generator outage states and associated requirements and calculations (FERC Docket No. ER14-2518-000), September 2, 2014.
- Affidavit on behalf of the Independent Power Producers of New York regarding the need to maintain confidentiality for certain data submitted to the New York Public Service Commission by lightly regulated utilities. (NY PSC Matter No. 13-01288) August 6, 2014.
- Second Supplemental Affidavit on behalf of the Independent Power Producers of New York regarding the need to mitigate the uneconomic retention of the Dunkirk Power Plant which is being retained pursuant to a 10 year out-of-market contract (FERC Docket No. EL13-62-000), March 25, 2014.
- Supplemental Affidavit on behalf of Entergy rebutting the claimed rate impacts associated with the implementation of the NYISO Lower Hudson Valley capacity zone. (FERC Docket No. ER14-500-000), January 6, 2014.
- Affidavit on behalf of Entergy regarding the need to reject a phase in for implementing the NYISO Lower Hudson Valley capacity zone Demand Curve. (FERC Docket No. ER14-500-000), December 20, 2013.
- Affidavit on behalf of the Independent Power Producers of New York regarding the appropriate values for determining the NYISO Installed Capacity Demand Curves. (FERC Docket No. ER14-500-000), December 20, 2013.
- Second Supplemental Affidavit on behalf of Entergy regarding why it is inappropriate to phase in capacity prices for the NYISO New Capacity Zone for the Lower Hudson Valley region and why the new information that the NYISO relied upon for their filing is neither new nor correct. (FERC Docket No. ER13-1380-000), November 12, 2013.
- Affidavit on behalf of the Independent Power Producers of New York before the Board of the NYISO regarding the proposed demand curves being set at too low a level to adequately address the risk of entering the New York electricity markets as a merchant facility. October 2, 2013.
- Supplemental Affidavit on behalf of the Independent Power Producers of New York regarding the why regulated RMR contracts must bid into the NYISO Installed Capacity Market at their full going forward costs. (FERC Docket No. EL13-62-000), June 14, 2013.
- Supplemental Affidavit on behalf of Entergy regarding the need to not delay in implementing a New Capacity Zone for the Lower Hudson Valley region and the flaws in arguments that a New Capacity Zone is not needed at this time. (FERC Docket No. ER13-1380-000), June 5, 2013.
- Affidavit on behalf of Entergy regarding the need to implement a New Capacity Zone for the Lower Hudson Valley region. (FERC Docket No. ER13-1380-000), May 21, 2013.
- Affidavit on behalf of the Independent Power Producers of New York regarding the need to revise the NYISO tariff to assure that generators with regulated RMR contracts bid into the NYISO Installed Capacity Market at their going forward costs. (FERC Docket No. EL13-62-000), May 10, 2013.

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- Affidavit on behalf of the Independent Power Producers of New York to the NYISO Board of Directors regarding why a peaking unit should continue to be used as the Demand Curve Proxy Unit. April 17, 2013.
- Affidavit on behalf of the Independent Power Producers of New York regarding the inappropriate requirement that Cayuga bid into the NYISO Installed Capacity Market at a de minimis price while recovering its costs from a regulated RMR contract. (FERC Docket No. ER13-405-000), January 7, 2013.
- Affidavit on behalf of the New York City Suppliers rebutting Hudson Transmission Partners claims that their Buyer-Side Mitigation examination by the NYISO had been performed in a manner inconsistent with the NYISO Service Tariff Requirements. (FERC Docket No. EL12-98-000), November 13, 2012.
- Affidavit on behalf of Entergy Nuclear Power Marketing, LLC and the GenOn Parties concerning the NYISO's June 29, 2012 Compliance Filing proposing tariff revisions to its Market Administration and Control Area Services Tariff ("Services Tariff") to implement both buyer-side and supplier-side mitigation measures for New Capacity. (FERC Docket No. ER12-360-001), July 20, 2012.
- Rebuttal Testimony on behalf of the Independent Power Producers of New York on the flaws in the project sponsor's and the New York Department of Public Service's evaluation of the economics of the Champlain Hudson Power Express. (NYPSC Docket No. 10-T-0139), June 28, 2012.
- Testimony on behalf of the Independent Power Producers of New York on the economics of the Champlain Hudson Power Express. (NYPSC Docket No. 10-T-0139), June 7, 2012.
- Third Supplemental Affidavit on behalf of the New York City Suppliers rebutting Bayonne Energy Center's claims regarding their gas pricing advantage and the value of TCCs for their project. (FERC Docket No. EL11-50-000), October 10, 2011.
- Second Supplemental Affidavit on behalf of the New York City Suppliers on the New York Independent System Operator's flawed analysis in its mitigation determination for Astoria Energy II and the Bayonne Energy Center. (FERC Docket No. EL11-50-000), September 23, 2011.
- Supplemental Affidavit on behalf of the New York City Suppliers on the New York Independent System Operator's failure to properly apply its capacity market mitigation rules to Astoria Energy II and the Bayonne Energy Center. (FERC Docket No. EL11-50-000), July 11, 2011.
- Second Supplemental Affidavit on behalf of the New York City Suppliers on the tight correlation between natural gas pricing and LBMPs and the inability of the NERA model to represent this relationship. (FERC Docket No. EL11-42-000), July 21, 2011.
- Affidavit on behalf of the New York City Suppliers on the New York Independent System Operator's failure to properly apply its capacity market mitigation rules to Astoria Energy II and the Bayonne Energy Center. (FERC Docket No. EL11-50-000), July 11, 2011.
- Supplemental Affidavit on behalf of the New York City Suppliers on the flaws and inconsistencies shown in the New York Independent System Operator release of data to use

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for the New York City uneconomic entry mitigation exemption test. (FERC Docket No. EL11-42-000), June 15, 2011.

- Affidavit on behalf of the New York City Suppliers on the proper way to apply the New York City uneconomic entry mitigation exemption test. (FERC Docket No. EL11-42-000), May 31, 2011.
- Affidavit on behalf of the Independent Power Producers of New York in response to the NYISO's Compliance Filing on the Capacity Demand Curve on the appropriate level of average excess to assume in setting the Capacity Demand Curve. (FERC Docket No. ER11-2224-004), April 19, 2011.
- Affidavit on behalf of New York City Suppliers on the need to revise the Baseline for Special Case Resources. (FERC Docket No. ER11-2906-000). March 4, 2011.
- Reply Affidavit on behalf of the Independent Power Producers of New York on New York Installed Capacity Demand Curve on the arguments against including System Deliverability Upgrade costs in the Demand Curves, on the inappropriateness of using a Long Island unit as a proxy for the NYCA demand curve and set the Demand Curve based upon inaccurately and the flaws of using historic auction results to determine the amount of excess capability due to winter unit ratings. (FERC Docket No. ER11-2224-000), January 7, 2011.
- Affidavit on behalf of the Independent Power Producers of New York on New York Installed Capacity Demand Curve on the need for accurate representation of the average excess capacity levels, System Deliverability Upgrade costs and New York City interconnection costs in the development of the Demand Curves. (FERC Docket No. ER11-2224-000), December 21, 2010.
- Affidavit on behalf of New York City Suppliers on the New York Independent System Operator's proposed revisions to the New York City Installed Capacity Mitigation measures on the impact of the NYISO's changes on reducing the effectiveness of the mitigation. (FERC Docket No. ER10-3043), November 22, 2010.
- Affidavit on behalf of the Independent Power Producers of New York in response to the Comments of the New York Transmission Owners on the NYISO's Second Tariff Compliance Filing and Request for Waiver of the NYISO on the inappropriateness of using the price at the 104% point on the New York City Demand Curve as the Net CONE value. (FERC Docket No. ER08-695-001), June 21, 2010.
- Affidavit on behalf of AES Eastern Energy, L.P., Constellation Energy Nuclear Group, LLC, Empire Generating Co., LLC, GDF SUEZ Energy North America, NRG Companies, PSEG Companies, Shell Energy North America (US), L.P., and TC Ravenswood, LLC on the New York Independent System Operator and New York Transmission Owner compliance filing to implement the Comprehensive Deliverability Plan on the need to apply a deliverability test to capacity imports. (FERC Docket No. ER04-449-019), May 18, 2009.
- Affidavit on behalf of the Independent Power Producers of New York on the NYISO's October 30, 2008 Tariff Compliance Filing on the In-City Capacity Mitigation on the inappropriateness of the NYISO's proposed Special Case Resource uneconomic entry mitigation and test for uneconomic exports. (FERC Docket No. EL07-39), December 2, 2008.

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- Affidavit on behalf of the In City Capacity Suppliers in support of their Section 206 filing to restate the New York City Installed Capacity Demand Curve pursuant to expiration of the New York City ICIP Tax Abatement Program. (FERC Docket No. EL09-4), October 14, 2008.
- Affidavit on behalf of the Independent Power Producers of New York in support of their motion for leave to file answer, and answer to the New York Transmission Owner's Comments on the Commission decision implementing New York City Capacity Market Mitigation on the appropriateness of using the Net CONE as shown at 100% of the minimum capacity requirement as the basis for the mitigation offer floor. (FERC Docket No. ER08-695), June 11, 2008.
- Affidavit in support of the limited protest being submitted by Astoria Generating Company, L.P. to address the New York Independent System Operator's ("NYISO") Second Tariff Compliance Filing of and Request for Waiver of the New York Independent System Operator Inc. Implementing New York City ICAP Market Mitigation Measures ("NYISO Compliance Filing") to address appropriate recognition of opportunity costs associated with exports and appropriate thresholds and penalties for determining mitigation. (FERC Docket No. ER08-695-001), May 27, 2008.
- Testimony on behalf of the Independent Power Producers of New York on the Vertical Market Power concerns on the Acquisition of Energy East Corporation by Iberdrola, S.A. (NY PSC Case 07-M-0906). January 11, 2008.
- Affidavit on behalf of AES Eastern Energy, L.P., Astoria Generating Company, L.P., a US Power Generating Company, Entergy Nuclear Power Marketing, LLC and the Mirant Parties on New York Installed Capacity Demand Curve on the appropriate values for the Demand Curve. (FERC Docket No. ER08-283-000), December 31, 2007.
- Affidavit on behalf of AES Eastern Energy on the New York State Department of Environmental Conservation's and New York State Energy Research Development Authority's proposed regulations to implement the Regional Greenhouse Gas Initiative (6 NYCRR Part 242, 6 NYCRR Part 200 and 21 NYCRR Part 507), December 19, 2007
- Affidavit on behalf of Astoria Generating Company, L.P., a U.S. Power Generating Company on the NYISO's proposed Capacity Market Mitigation Measures on the appropriate design of New York City Installed Capacity mitigation measures. (FERC Docket No. EL07-39-000), December 10, 2007.
- Affidavit on behalf of Astoria Generating Company, L.P., a U.S. Power Generating Company on the NYISO's proposed Capacity Market Mitigation Measures. (FERC Docket No. EL07-39-000), November 19, 2007.
- Affidavit on behalf of AES Eastern Energy, LP., Astoria Generating Company, L.P., a U.S. Power Generating Company, Dynegy Northeast Generation, Inc., Entergy Nuclear Power Marketing, LLC, the Indeck Companies, and the Mirant Parties to NYISO Board of Directors on NYISO Staff proposed Installed Capacity Demand Curves on the appropriate values for the Demand Curves. October 1, 2007.

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- Affidavit on behalf of the Independent Power Producers of New York to NYISO Board of Directors on NYISO Staff proposed Installed Capacity Demand Curves on the appropriate values for the Demand Curves. October 1, 2007.
- Affidavit on behalf of the Independent Power Producers of New York on the Vertical Market Power concerns in the Merger of National Grid PLC and KeySpan Corporation. (NY PSC Case 06-M-0878), July 11, 2007.
- Affidavit on behalf of the Independent Power Producers of New York on the proper determination of Location Based Marginal Costs on May 8 and 9, 2000 (FERC Docket No. EL01-19-006), July 8, 2005.
- Affidavit on behalf of Entergy Corporation, Mirant Bowline, LLC, Mirant Lovett, LLC, Mirant NY-Gen, LLC, Mirant Americas Energy Marketing, and Sithe Energies, Inc. to NYISO Board of Directors on NYISO Staff proposed Installed Capacity Demand Curves. October 15, 2004
- Affidavit on behalf of the Independent Power Producers of New York to NYISO Board of Directors on NYISO Staff proposed Installed Capacity Demand Curves. October 15, 2004
- Affidavit on behalf of the Independent Power Producers of New York on New York Installed Capacity Demand Curve (FERC Docket No. ER03-647-000) on the need to implement an Installed Capacity Demand Curve for the NYISO. April 10, 2003.
- Affidavit on behalf of AES, Mirant & Sithe to NYISO Board of Directors on Appeal of the Management Committee Decision on the ICAP Demand Curve on the need to implement an Installed Capacity Demand Curve for the NYISO. March 7, 2003.
- Affidavit on behalf of the Independent Power Producers of New York to NYISO Board of Directors on Appeal of the Management Committee Decision on the ICAP Demand Curve on the need to implement an Installed Capacity Demand Curve for the NYISO. March 7, 2003.
- Affidavit on behalf of the Independent Power Producers on the ICAP Demand Curve under Appeal of the NYISO Business Issues Committee decision at the NYISO Management Committee on the need to implement an Installed Capacity Demand Curve for the NYISO. December 27, 2002.
- Affidavit on behalf of Reliant Energy Power Generation on Setting the Conduct and Impact Thresholds for in-City Generating Units. (FERC Docket No. ER01-3155-002 et. al.), May 15, 2002.
- Testimony on behalf of TransGas Energy Systems in their Article 10 Citing proceeding (NY PSC Case 01-F-1276) on the energy and pollutant savings associated the TransGas Energy Systems proposed 1000 MW Combined Cycle facility.
- Affidavit on behalf of Reliant Energy Power Generation on New York Independent System Operator's Compliance Filing Regarding Comprehensive Market Mitigation Measures. (FERC Docket No. ER01-3155-002 et. al.), April 23, 2002
- Testimony on behalf of Orion Power New York GP, Inc. on Con Edison Company of New York, Inc.'s Proposal to Revise the Localized Market Power Mitigation Measures (FERC Docket No. ER98-3169-000), April 3, 2001.

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- Affidavit on behalf of Southern Energy North America, Inc., AES NY, L. L. C. , Sithe Power Marketing, L. P., & FPL Energy LLC on the need to retain the PJM Installed Capacity Market. (FERC Docket No. EL01-3-000), October, 25, 2000.
- Testimony on behalf of the Mid-Atlantic Power Supply Association on the Baltimore Gas & Electric Company stranded costs. (Maryland PSC Case No. 8794), December 22, 1998.
- Testimony on behalf of Enron Power Marketing, Inc on New York Electricity Companies' request for market-based rate authority. (FERC Docket No. ER97-1523 et al.), October 31, 1997.
- Testimony on behalf of Sithe Energies, Inc on Petition of Niagara Mohawk Power Corporation to Employ 1996 Fuel Adjustment Clause Targets in 1997 (NY PSC Case 96-E-0928) on the inappropriateness of using the outdated targets to determine the 1997 avoided costs.
- Testimony on behalf of the Independent Power Producers of New York and Enron Capital & Trade Resources on Central Hudson Gas & Electric Corporation rate/restructuring proceeding (NY PSC Case 96-E-0909) on the problems with the proposed settlement associated with the proposal that Central Hudson continue to be a vertically integrated utility holding company and to propose interim rate treatment until the time that Central Hudson divests its generation assets.
- Testimony on behalf of the Independent Power Producers of New York and Enron Capital & Trade Resources on Orange & Rockland Utilities, Inc. rate/restructuring proceeding (NY PSC Case 96-E-0900) on the problems in the proposed settlement associated with Orange and Rockland continuing to own generation resources in the deregulated competitive generation market, propose incentives for Orange and Rockland to divest, and, to propose interim rate treatment until the time that Orange and Rockland divests its generation assets..
- Testimony on behalf of the Independent Power Producers of New York and Enron Capital & Trade Resources on Consolidated Edison Company of New York, Inc. rate/restructuring proceeding (NY PSC Case 96-E-0897) on the problems in the propose settlement associated with Con Edison continuing to be a vertically integrated utility owning generation resources in the developing competitive generation market, to propose stronger incentives for divestiture of Con Edison's fossil generation and to propose interim regulatory treatment until the time that Con Edison divests its generation assets.
- Testimony on behalf of the Independent Power Producers of New York and Enron Capital & Trade Resources on New York State Electric & Gas Corporation rate/restructuring proceeding (NY PSC Case 96-E-0891) on the problems with NYSEG's proposal to continue owning generation under a utility holding structure, the manner in which the proposed structure shielded the generating company from competition, and the need to divest the generating assets.
- Testimony on behalf of Sithe Energies, Inc on Consolidated Edison Company of New York, Inc. rate proceeding (NY PSC Case 96-E-0798) on the appropriate bases for calculating the short run avoided energy costs for Qualifying Facilities for Con Ed.

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- Testimony on behalf of California Cogeneration Council on Southern California Edison 1995 Energy Cost Adjustment Clause (CPUC Application No. 95-05-049) on the value of Qualifying Facilities for SCE
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1995 Energy Cost Adjustment Clause (CPUC Application No. 95-04-002) on the value of Qualifying Facilities for PG&E and the O&M costs avoided by QFs
- Testimony on behalf of Sithe Energies, Inc on Consolidated Edison Company of New York, Inc. rate proceeding (NY PSC Case 94-E-0334) on the appropriate bases for calculating the short run avoided energy costs for Qualifying Facilities for Con Ed.
- Testimony on behalf of the Independent Power Producers of New York on Niagara Mohawk Power Corporation rate proceeding, (NY PSC Cases 94-E-0098 and 94-E-0099) on need to retire certain generating units that are part of their portfolio or in the alternative to introduce rate making that puts Niagara Mohawk at risk for the units being economic.
- Testimony on behalf of California Cogeneration Council on San Diego Gas & Electric Company 1994 Energy Cost Adjustment Clause (CPUC Application No. 94-10-023) on the value of Qualifying Facilities for SDG&E and the O&M costs avoided by QFs
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1994 Energy Cost Adjustment Clause (CPUC Application No. 94-04-002) on the value of Qualifying Facilities for PG&E and the O&M costs avoided by QFs
- Testimony on behalf of Sithe Energies, Inc on Combined Long Run Avoided Cost and Generic Fuel Adjustment Clause proceeding (NY PSC Cases 93-E-0912 and 93-E-1075) on the appropriate long and short run avoided energy costs for Qualifying Facilities.
- Testimony on behalf of Sithe Energies, Inc on Niagara Mohawk Power Corporation 1993 Rate Case (NY PSC Cases 93-E-0376, et al.) on the appropriate bases for calculating the short run avoided energy costs for Qualifying Facilities for NMPC.
- Testimony on behalf of Kamine and Besicorp Companies on New York Public Service Commission Curtailment Proceeding (NY PSC Case Nos. 92-E-0814 and 88-E-081) on the need for Niagara Mohawk Power Corporation to curtail Qualifying Facilities
- Testimony on behalf of KELCO Division of MERCK & Co., Inc. on San Diego Gas & Electric Company 1992 Energy Cost Adjustment Clause (CPUC Application No. 92-09-078) on the value of Qualifying Facilities for SDG&E and the O&M costs avoided by QFs
- Testimony on behalf of California Cogeneration Council on Southern California Edison 1992 Energy Cost Adjustment Clause (CPUC Application No. 92-05-047) on the value of Qualifying Facilities for SCE
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1992 Energy Cost Adjustment Clause (CPUC Application No. 92-04-001) on the value of Qualifying Facilities for PG&E and the O&M costs avoided by QFs

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- Testimony on behalf of KELCO Division of MERCK & Co., Inc. on San Diego Gas & Electric Company 1991 Energy Cost Adjustment Clause (CPUC Application No. 91-09-059) on the value of Qualifying Facilities for SDG&E and the O&M costs avoided by QFs
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1991 Energy Cost Adjustment Clause (CPUC Application No. 91-04-003) on the value of Qualifying Facilities for PG&E
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1990 Energy Cost Adjustment Clause (CPUC Application No. 90-04-003) on the value of Qualifying Facilities for PG&E
- Testimony on behalf of California Cogeneration Council on San Diego Gas & Electric Company 1989 Energy Cost Adjustment Clause (CPUC Application No. 89-09-031) on the value of Qualifying Facilities for SDG&E
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1989 Energy Cost Adjustment Clause (CPUC Application No. 89-04-001) on the value of Qualifying Facilities for PG&E (1989, Phases I and II)
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1990 Test Year General Rate Case (CPUC Application No. 88-12-005) on the amount of utility operations and maintenance costs avoided by the presence of QF generation.
- Testimony on behalf of California Cogeneration Council on San Diego Gas & Electric Company 1988 Energy Cost Adjustment Clause (CPUC Application No. 88-07-003) on the value of Qualifying Facilities for SDG&E.
- Testimony on behalf of California Cogeneration Council on Pacific Gas & Electric Company 1988 Energy Cost Adjustment Clause (CPUC Applications Nos. 88-04-020 and 88-04-057) on the value of Qualifying Facilities for PG&E (1988, Phases I and II).