

1 energy projects which includes “The Effect of Wind Development on Local Property Values”,
2 dated May 2003, that was provided to EFSEC in the Clarification Information submittal.

3
4 Q Would you please identify what has been marked for identification as Exhibit 35-1(GS-1).

5
6 A Exhibit 35-1 (GS-1) is a résumé of my educational background, expertise and employment
7 experience.

8
9 Q Are you sponsoring any portions of the “Application for Site Certification” and “Clarification
10 Information Provided to EFSEC Independent Consultant for EIS Preparation”, for the Kittitas
11 Valley Wind Power Project?

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13 A Yes. I am sponsoring Clarification Information, Attachment 10, “The Effect of Wind
14 Development on Local Property Value”, for which I was primarily responsible for the analysis
15 and development.

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17 Q Are you familiar with the above referred study?

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19 A Yes

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21 Q Did you prepare this study, or, if not, did you direct and /or supervise their preparation?

22
23 A Yes.

1 Q Is the information in this study within your area of authority and /or expertise?

2

3 A Yes

4

5 Q Are the contents of this study either based upon your own knowledge, or upon evidence,
6 such as studies and reports as reasonably prudent persons in your field and expertise are
7 accustomed to rely in the conduct of their affairs?

8

9 A Yes.

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11 Q To the best of your knowledge, are the contents of this study true?

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13 A Yes.

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15 Q Do you incorporate the facts and content of this report as part of your testimony?

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17 A Yes.

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19 Q Are you able to answer questions under cross examination regarding this report?

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21 A Yes

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23 Q Do you sponsor the admission into evidence of these this study which was a part of the
24 Application?

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A Yes

Q Are there any modifications or corrections to be made to those portions of the Application that you are sponsoring?

A No.

Q. Would you please briefly describe your expertise and qualifications?

A I have worked in the field of regulatory economics and energy for more than 25 years. I am currently the Executive Director of the Renewable Energy Policy Project. Prior to taking that position I ran a consulting firm that assisted in several renewable energy commercialization efforts. I have offered expert witness testimony in 27 states. I have testified before Congress and numerous state legislatures on energy issues. From 1988 to 1991, I directed the Department of Public Service in the state of Vermont. My responsibilities there included determining the position of the state on energy development projects such as a proposed interstate natural gas pipeline.

Q Have you qualified as an expert witness in the State of Washington?

A. Yes, I have. In 1996 I testified before the Utilities and Transportation Commission of Washington on behalf of the state Attorney General’s Office in the Puget Power Merger case.

1
2 Q Would you please summarize and briefly describe the study you conducted regarding the
3 effect on wind farms on local land values.
4

5 A The first step in this analysis required assembling a database covering every
6 US wind development that came on-line after 1998 with 10 MW installed
7 capacity or greater. The wind developments were considered to have a
8 potential visual impact for the area within five miles of the turbines. This was
9 defined as the project view shed. For a time period covering roughly six years
10 and straddling the on-line date of the projects, we gathered the records for all
11 property sales for the view shed and for a community comparable to the view
12 shed. The goal in selecting comparable communities was to have
13 communities that are as similar as possible with respect to variables that might
14 affect residential housing values, with the exception of the presence or
15 absence of wind farms. To define the comparable communities we consulted
16 with local County Assessors and analyzed 1990 and 2000 U.S. Census data.
17 We selected five criteria to analyze: population, median household income,
18 ratio of community median income to poverty level, number of housing units,
19 and median value of owner-occupied housing units.
20

21 For all projects for which sufficient property sales data was available, we then
22 conducted a statistical analysis to determine how property values changed
23 over time in the view shed and in the comparable community. This database
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1 contained more than 25,000 records of property sales within the view shed
2 and the selected comparable communities.

3
4 Under my direction, REPP looked at price changes for each of the ten projects
5 in three ways: Case 1 looked at the changes in the view shed and comparable
6 community for the entire period of the study; Case 2 looked at how property
7 values changed in the view shed before and after the project came on-line; and
8 Case 3 looked at how property values changed in the view shed and
9 comparable community after the project came on-line.

10
11 If property values had been harmed by being within the view-shed of major
12 wind developments, then we expected that to be shown in a majority of the
13 projects analyzed. Instead, to the contrary, we found that for the great majority
14 of projects, the property values actually rose more quickly in the view shed
15 than they did in the comparable community. Moreover, values increased
16 faster in the view shed after the projects came on-line than they did before.
17 Finally, after projects came on-line, values increased faster in the view shed
18 than they did in the comparable community. In all we analyzed ten projects in
19 three cases, we looked at thirty individual analyses and found that in twenty-
20 six of those property values in the affected view shed performed better than
21 the alternative.

22
23 Property values respond to a large number of influences and we do not offer
24 this analysis as a predictor of values. The analysis we conducted was done

1 solely to determine whether the existing data could be interpreted as
2 supporting the claim that wind development harms property values. The
3 statistical analysis of all property sales in the view shed and the comparable
4 community provides no evidence that wind development has harmed property
5 values within the view shed.
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Exhibit 35-1(GS-1)

RESUME

GEORGE J. STERZINGER
Renewable Energy Policy Project
1612 K. St., NW
Suite 202
Washington, D.C. 20006

Executive Director REPP: Directs the activities and project development for national organization responsible for accelerating market acceptance of renewable energy.

Prior Position: Principal in EER Consulting, a Washington, D.C. firm specializing in regulatory economics, energy planning and the commercialization of energy/environmental technologies. Prior to EER Consulting, Mr. Sterzinger served as Commissioner of the Vermont Department of Public Service and was responsible for the energy and regulatory policies for the State of Vermont.

Areas of Expertise

Regulatory Economics: Presented legislative and regulatory testimony and economic analysis covering electric, natural gas, telecommunications and water industries in 27 states. Worked on electric restructuring and regulatory in California, Washington, Texas, Vermont, Illinois, Utah and New Hampshire. In Vermont, directed a small public power entity which negotiated power contracts and distribution fees for use of in-state lines to serve residential customer base. In addition, as Commissioner in Vermont, had responsibility for Consumer Advocates Division which participated in all contested hearings as a matter of state law. Articles on electric distribution system cost allocation cited in Bonbright's Principles of Regulation.

Energy Planning: As Commissioner, prepared the first State of Vermont Comprehensive Energy Plan, an analysis of all forms of energy use, the environmental consequences of that usage, and a set of policies that would obtain ambitious environmental targets while assuring energy affordability. The New York Times called this plan "A sweeping attack on global warming, acid rain, and dependence of foreign fuels ... The energy plan, which experts said was unprecedented in scope, seeks to extend a strategy now bearing fruit in the field of electric utilities to all forms of energy use, from transportation to home heating to industrial fuel consumption." (New York Times, Vermont's Broad New Plan on Energy, January 11, 1991).

As staff representative to Chair of the National Governor's Association Energy and Environmental Committee, produced a national energy plan, based on least cost planning principles, endorsed by all Governors.

In Vermont, led the department responsible for electric and telecommunications long range integrated planning efforts. Responsible for state analysis of interstate natural gas pipeline proposal in FERC "open season" to expand pipelines in northeast U.S.

Energy Commercialization: Experience in solar, biomass and hydro technology development. Responsible for several domestic policy initiatives, the initial joint venture in biomass gasification technology and the Solar Enterprise Zone, to expand commercialization programs. Official delegate on USDOE Sustainable

Development Expert missions. Currently working to integrate domestic commercialization with export market opportunities.

Solar: Primary consultant to DOE to assess the commercial potential for solar energy development at the Nuclear Test Site Facility in Nevada. Prepared for a solar enterprise zone in Nevada. This led to the formation of the Corporation Solar Technological and Renewable Resources, a non-profit operation with a \$3M start-up grant. For CSTRR, prepared the RFP for up to 100 MW's of solar electricity. Currently managing the assessment of proposals and selection process.

Biomass: Evaluated and proposed joint venture to DOE to commercialize an indirect gasification technology for integration with gas turbines, fuel cells and other potential price movers. This initial study is published by NREL. The analysis served as the basis for the first DOE biomass commercialization programs. Official delegate on US-India trade mission of 1994. Negotiated MOU with a major Indian manufacturer to co-develop technology in India. Initial U.S. commercial-scale effort is permitted and under construction. Article describing project and rationale for effort published by Technology Review of MIT.

Hydro: Currently working to transfer micro-hydro technology that can be easily adapted to agricultural water use requirements from European market to Asia.

Project Development: Have worked in a variety of independent power project efforts. Assisted GE Capital in the evaluation of conversion/investment strategies for a natural gas final gas turbine generator in Milford, New Jersey. Currently working on economic evaluations of waste-to-energy and multi-fueled projects for the U.S. and international markets.

1992-2002	Principal, EER Consulting
1992	Tellus Research Institute, Washington Representative
1988-1991	Commissioner, Vermont Department of Public Service
1980-1988	Economist, National Consumer Law Center
1978-1980	Director, New England Regional Energy Project
1976-1978	Economist, New England Regional Energy Project

Major Publications

"Nixing the Change: OPEC, the United States and Renewable Energy" Harvard International Review, Winter 2004

Regulatory Reform: Lessons from California, Technical Paper, Economic Policy Institute, Washington D.C. 2002.

"Making Biomass Energy a Contender,;" Technology Review, MIT, October 1995

"More Power to PURPA," Wall Street Journal, June 7, 1995

"A New Role for Renewables and Energy Efficiency in the World Bank Power Sector" (with Julio De Castro), DOE and Dutch Government Project Appraisal of World Bank Program in Asia, 1995

"Policies to Enhance Renewable Energy Development," Presented to Ministry of Non-Conventional Energy Supplies, Government of India, Agra, India, January 1995

"Integrated Gasification Combined Cycle: Biomass Joint Venture Evaluation," National Renewable Energy Laboratory (NREL/TP-430-6080), May 1994

"Nevada Test Site Solar Feasibility Study" (with Dyn Corp Meridien), for Department of Energy, September 1994

"Renewable Energy Opportunities in the Coming Decade," Presentation to SOLTECH Conference on Renewable Energy, 1993

"Purchased Power, Incentive and Regulation and Economic Principles," Presentation to NARUC Conservation and Renewable Subcommittee, 1993

"First Generation Nuclear Retirement," New York Times, June 2, 1991

"Critique of Incentives and Lost Revenue Adjustments," Presentation to NARUC Conservation Subcommittee, January 10, 1990

"Conservation: What Road to Take," Paper presented at Williamsburg Conference, Institute for Public Utilities, October 1989

"Economic and Demographic Analysis of Measured Service," Policy Institute, American Association of Retired People, 1988

"AT&T's Frail Arguments for Higher Access Charges," Boston Globe, May 5, 1987

"Phone Ownership After Divestiture," Public Utility Fortnightly, October 2, 1986

"The "Peaker" Methodology for Finding the Marginal Costs of Electricity," Public Utility Fortnightly, September 29, 1983

"Oil Shale Development, and Electric Generation Requirements, Regulatory Policy Reforms," prepared for Colorado Energy Advocacy Office, 1982

"The Customer Charge and Some Programs of Double Allocation of Distribution Systems Costs," Public Utility Fortnightly, July 1981

Honors

Who's Who in Energy 1990-1991

Chairman, Vermont State Nuclear Advisory Committee, 1988-1991

Chairman, Governor's Committee on Unregulated Fuel Price Increases, 1990-1991

Chairman, Governor's Committee on Energy Planning, 1990-1991

Treasurer, Honor Society, St. Joseph's College

Education

Graduate work, Economics, Purdue University, West Lafayette, Indiana, 1964-68

BS Economics, with Honors, St. Joseph College, Rensselaer, Indiana, 1960-63

Testimony

- 2001 Before the California Public Utilities Commission. Witness for the Commission on the proper inter-class allocation of the rate increase enacted for PG&E and SoCal Edison.
- 2000 Before the Illinois Commerce Commission on the Request of CILCO to remove an automatic adjustment clause.
- 1999 Before the Illinois Commerce Commission pending testimony on the appropriateness of the economic incentives in the Service and Facilities Agreement proposed by Dynegy, the holding company for Illinois Power.
- 1999 Before the Illinois Commerce Commission, testimony on the sale of generation assets by Commonwealth Edison. (Case settled.)
- 1998 Before the Public Services Commission of Utah on behalf of the Committee of Consumer Services in the matter of a review of the adequacy of revenues for PacifiCorp. The testimony reviewed cost of service, the appropriateness of a continuing Fairness Adjustment related to merger costs, and rate design.
- 1997 Before the Public Service Commission of the State of Texas on behalf of the Office of Public Utility Counsel regarding a review of the proposed Central and Southwest proposal to fund energy efficiency and renewable energy projects with a surcharge on residential bills.
- 1996: Before the Public Service Commission of Washington on Behalf of the Attorney's General Office in the Puget Power Merger case. Testimony on the steps for a Pilot Program on retail access.
- Before the Public Service Commission of the State of Texas on behalf of the Consumer Advocates Office on proper treatment of fuel costs and incentive regulation in order to promote transition to competition. Review of a proposal by Central Power & Light.
- Before the Public Service Commission of the State of Texas on behalf of the Office of Public Utility Counsel, regarding review and critique of Texas Utility's proposal for recovering purchased power and demand side management expenses. Particular attention is given to the proposal to mark-up the costs of purchased power, and the ineffectiveness of this proposal as a form of incentive regulation.
- 1995: Before the Public Service Commission of the State of Illinois on behalf of the Citizen's Utility Board regarding the review of Central Illinois Light Company's proposal for pilot programs offering direct retail access for certain large industrial customers and selected residential areas.
- Before the Public Service Commission of the State of Illinois on behalf of the Citizen's Utility Board regarding the review of Illinois Power Company's proposal for a pilot program offering direct retail access for certain large industrial customers. Involved in negotiated settlement condition that a similar pilot for residential customers be studied.
- 1993: Before the Public Service Commission of the Commonwealth of Virginia on behalf of the Virginia Citizen Consumer Council regarding the Application of Virginia Electric and Power Company for an Increase in Base and a Review of the Cost Allocation and Rate Design Practices of the Company.

Before the Michigan Service Commission on behalf of the Attorney General in the matter of the Application of the Detroit Edison Company for Authority to Amend its Rate Schedule for Governing the Supply of Electric Energy and to Amend other Miscellaneous Rates.

- 1992: Before the Texas Public Utilities Commission v. Texas-New Mexico on behalf of the Office of Public Utility Counsel, regarding the allocation of production plant and residential rate design.

Before the Public Utilities Commission of the State of Colorado on behalf of the Office of Consumer Counsel regarding the application of Public Service Company of Colorado for Authority to Implement a Low-Income Energy Efficiency Assistance Program.

Before the Council of the City of New Orleans on behalf of the Alliance for Affordable Energy regarding the Ex-Parte Application of New Orleans Public Service, Inc. to Increase its Rates and Charges for Natural Gas Service.

Before the California Public Utilities Commission on behalf of Towards Utility Rate Normalization on Residential Rate Design, Marginal Cost and Energy Efficiency and Environmental Policy Goals.

Before the Public Service Commission of the District of Columbia on behalf of the People's Counsel in the Matter of the Application of Potomac Electric Power Company for Approval of its Second Least-Cost Plan.

Before the Public Service Commission of the State of New York on behalf of the Public Utility Law Project in the Matter of the Application of Niagara Mohawk Power Corp for an Increase in its Rates, to Analyze Recovery of DSM Costs from Classes of Customers and Assess Overall Fairness of Revenue Increase Allocation.

- 1991: Before the Texas Public Utilities Commission v. Centel Telephone Company concerning the allocation of revenue decrease among classes and universal service goals.

Before the Utah Public Service Commission v. Utah Power and Light concerning the proper treatment of merged system costs and allocation of revenue decrease among classes. Also concerned with the integration of DSM programs into traditional rate design.

Before the West Virginia Public Service Commission v. Monongahela Power Company and the Potomac Edison Company on behalf of the Consumer Advocate Division concerning the compliance plan for Phase I requirements of the Clean Air Act Amendments of 1990.

Before the Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania Company on behalf of the Pennsylvania Office of Consumer Advocate regarding cost allocation and rate design. Docket No. R-901873.

- 1986: Before the Rhode Island Public Utilities Commission v. Blackstone Valley Electric Co. on behalf of the Governor's Office of Energy Assistance regarding the reform of purchased power cost allocation, the re-design of commercial tariffs, and implementing of long-run conservation plant. (Rebuttal testimony filed).

Before the Public Service Commission of Utah v. Utah Power & Light on behalf of the Committee of Consumer Services regarding a demand allocation factor for distribution plant based on a study of UP&L distribution plant.

Before the Massachusetts Department of Public Utilities on behalf of Massachusetts Fair Share, Western Massachusetts Community Action Programs and the Office of Energy Resources regarding the inclusion of long-run marginal energy component in marginal cost calculation.

Before the New Jersey Department of Public Utilities v. Atlantic City Electric, on behalf of the Department of Public Advocate, in the classification and allocation of distribution plant.

Before the New Jersey Department of Public Utilities on behalf of Public Advocate regarding distribution plant account classification methodology used by Public Service Electric and Gas.

Before the Pennsylvania Public Utility Commission v. Philadelphia Electric Company on behalf of the Consumers Education and Protective Association, et al. regarding the effects on the calculated cost-of-service of including Limerick II in the rate base and in particular the effect on residential rate payers by income group.

Before the New Jersey Department of Public Utilities v. Jersey Central Power and Light on behalf of the Public Advocate regarding the analysis of electric cost allocation and in particular, residential rate design.

1985: Before the New Jersey Department of Public Utilities v. Atlantic City Electric Company on behalf of the Public Advocate, an analysis of the residential revenue responsibility, and the development of residential tariffs, especially customer charge portion of that tariff.

Before the Illinois Commerce Commission v. Commonwealth Edison Company, on behalf of the Community Action for Fair Utility Practice, et al., regarding the appropriateness of the recovery of conservation program costs through an automatic adjustment mechanism.

Before the Nevada Public Service Commission v. Sierra Pacific Power Company, on behalf of the Office of Consumer Council, regarding the calculation of marginal costs of electric service and the utilization of the results in determining interclass revenue responsibilities.

Before the New Jersey Department of Public Utilities v. Rockland Electric Company, on behalf of the Department of Public Advocate, regarding the allocation of a proposed revenue increase among customer classes, the design of intra-class rate designs.

Before the Illinois Commerce Commission v. People's Gas Co, on behalf of South Austin Coalition Community Council regarding the recovery of naphtha costs through an automatic adjustment clause.

Before the Illinois Commerce Commission v. Comm Edison, on behalf of the Citizens Utility Board, regarding determination of marginal costs to recover Byron and LaSalle nuclear plant costs. (Testimony presented in two phases).

1984: Before the Public Service Commission of West Virginia v. Wheeling Electric Company, on behalf of the Consumer Advocates Division, regarding the determination of proper methodology for allocating costs among classes. (Rebuttal testimony filed).

Before the New Jersey Department of Public Utilities v. Jersey Central Power and Light Company, on behalf of the Department of Public Advocate, regarding the electric cost-of-service study and the calculation of the proper customer charge for the residential tariff.

Before the Philadelphia Gas Commission v. Philadelphia Gas Works, on behalf of the Consumers Education and Protective Association, regarding the proper determination of a cost-of-service in the gas industry, and the appropriateness of incentive rates for industrial customers.

Before the Public Service Commission of West Virginia v. Appalachian Power Company on behalf of the Consumer Advocate Division, regarding the initial development of an allocated cost-of-service study for the company, and the determination of rate designs based upon that study. (Rebuttal and surrebuttal testimony provided).

Before the Pennsylvania Public Utilities Commission v. Pennsylvania Power and Light Company, on behalf of Branch 39 of the Utility Consumer Union of CEPA regarding the consideration of customers' ability to pay in the determination of overall responsibility for electric service.

Before the Vermont Public Service Board v. Burlington Electric Department, on behalf of low income intervenors, regarding a proper Winter-Summer differential for residential tariff.

Before the New Jersey Department of Public Utilities v. Atlantic City Electric, on behalf of the Public Advocate, regarding the proper classification of distribution plant and the determination of a customer charge for the residential tariff.

1983: Before the Washington Utilities and Transportation Commission v. Washington Water Power Company, on behalf of the Public Council, regarding distribution plant classification, relative risks of classes of customers, and transmission system cost analysis.

Before the Public Service Commission of Utah v. Utah Power and Light Company, on behalf of the Committee of Consumer Services, regarding the appropriateness of establishing separate tariff schedules for individual industrial customers.

Before the State of New Hampshire Public Utilities Commission v. Public Service Company of New Hampshire on behalf of Voice, regarding the appropriateness of the company request for a waiver of exemption from the lifeline rate previously filed before the Commission.

Before the Georgia Public Service Commission v. Georgia Power Company on behalf of Georgia Poverty Rights Organization, regarding a detailed critique of the methodologies employed by the company in the performance of the allocated cost-of-service study.

Before the Pennsylvania Public Utility Commission v. Philadelphia Electric Company on behalf of the Action Alliance of Senior Citizens of Greater Philadelphia, regarding the need to discount the price of electricity for customers placed upon service limited programs.

Before the Pennsylvania Public Utility Commission v. generic gas cost investigation, on behalf of the Crawford County Senior Citizens Council, et al., regarding the restructuring of the automatic adjustment clause for pipe line gas costs that would balance industry and consumer interests in the post-NGPA Era.

Before the Michigan Public Service Commission v. Michigan Consolidated Gas Company, on behalf of the residential ratepayer consortium regarding the approval of the gas costs recovery factors for calendar year 1983.

Before the Michigan Public Service Commission v. Michigan Consolidated Gas Company, on behalf of the residential ratepayer consortium regarding the request for the authority to implement the gas cost recovery plan and its 1983 gas rates.

Before the Michigan Public Service Commission v. Consumer Power Company, on behalf of the residential ratepayer consortium regarding the approval of gas cost recovery factors for the calendar year 1983.

Before the Michigan Public Service Commission v. Consumer Power Company, on behalf of the residential ratepayer consortium regarding the authority to implement a gas cost recovery plan and its 1983 gas rates.

1982: Before the Connecticut Public Utilities Commission v. generic investigation into residential customer service charges, on behalf of the consumer intervenors, regarding the proper classification of distribution plant and the appropriate residential ratepayer customer charge.

Before the Public Service Commission of West Virginia v. Appalachian Power Company, on behalf of the Consumer Advocate Division, regarding cost allocation and the residential rate design.

Before the New Jersey Department of Public Utilities v. Atlantic City Electric Company, on behalf of the Public Advocate, regarding the classification of distribution plant and the determination of the customer charge for the residential tariff.

Before the Massachusetts Department of Public Utilities v. Boston Gas Company on behalf of the Massachusetts Fair Share, regarding the appropriate allocation factor for system gas cost, and the residential gas rate design that would follow from that analysis.

Before the Main Public Utilities Commission v. Central Maine Power, on behalf of Pine Tree Legal Assistance, regarding the proper determination of residential customer charge.

Before the Colorado Public Utilities Commission v. Public Service Company of Colorado, on behalf of the Legal Aid Society of Denver, regarding an analysis of electric and gas cost of service studies.

Before the New Hampshire Public Utilities Commission v. generic investigation into lifeline rates, on behalf of the New Hampshire Legal Assistance, regarding the appropriateness of establishing a residential lifeline tariff.

- 1981: Before the State Corporation Commission of Virginia v. generic investigation into rate design on behalf of low income intervenors, regarding appropriate cost-of-service standards to adopt with respect to the PURPA Act of 1978.

Before the Public Service Commission of Utah v. generic investigation of rate design, on behalf of the Office of Consumer Counsel, regarding appropriate methodology for measuring marginal cost for electric service.

Before the Vermont Public Service Board v. Central Vermont Public Service Corporation, on behalf of the Vermont Low Income Advocacy Council, regarding the appropriateness of a request for an emergency or temporary increase in rates.

Before the Public Utility Commission of New Hampshire v. generic investigation into rates, on behalf of New Hampshire Legal Assistance, regarding an analysis of electric system plant costs on an embedded basis.

Before the New Mexico Public Service Commission v. El Paso Electric Company, on behalf of low income intervenors, regarding a review of the company's generation plan and construction program in order to draw conclusion for residential rate design.

Before the Public Service Commission of Colorado v. Yampa Valley Electric Association, on behalf of the Colorado Energy Advocacy Office, regarding electric system cost analysis (case stipulated).

Before the Public Utility Commission of Texas v. generic cost-of-service, rate design standards, on behalf of low income intervenors, regarding an appropriate methodology to be adopted for analyzing an electric system cost-of-service.

Before the State of Colorado Public Utilities Commission v. Southern Colorado Power Company, on behalf of the Colorado Energy Advocacy Office and Pueblo Action, regarding a review of the cost-of-service study and rate design.

Before the Vermont Public Service Board v. Green Mountain Power Company on behalf of the Vermont Low Income Advocacy Council, regarding the appropriateness of the company's cost analysis and residential rate design.

- 1980: Before the Tennessee Valley Authority v. generic cost-of-service analysis, on behalf of various residential consumer groups regarding the compliance of Tennessee Valley Authority with the cost-of-service standards established in the PURPA Act of 1978.

Before the Massachusetts Department of Public Utilities v. Western Massachusetts Electric Company, on behalf of Massachusetts Law Reform,

regarding electric cost of company service principals and the residential tariff design.

Before the New Hampshire Public Utility Commission v. Public Service New Hampshire, on behalf of Voice regarding residential tariff design.

1979: Before the Massachusetts Department of Public Utilities v. generic rate investigation, on behalf of Massachusetts Law Reform regarding the establishment of a proper embedded and incremental cost analysis scheme.

Before the Public Utility Commission of Texas v. Houston Lighting and Power Company, on behalf of Houston ACORN and Consumer's union, regarding proper principles for the analysis of electric systems cost and rate design.

Before the Texas Public Utility Commission v. Texas Electric Service Company, on behalf of ACORN, regarding proper principles for the analysis of electric system costs and rate design.

Before the Connecticut Division of Public Utility control v. Connecticut Light and Power Company and Hartford Electric Light Company, on behalf of Torrairie Cooper, et al., regarding analysis of electric system costs and proper residential rate design.

Before the Massachusetts Department of Public Utilities v. Boston Edison Company, on behalf of Massachusetts Law Reform, regarding a review of the company rate design proposals.

Before the Rhode Island Public Utilities Commission v. Blackstone Valley Electric Corporation, on behalf of low income intervenors, regarding the justification for a freeze in the first three hundred kilowatt hours of consumption for the residential class.

Before the Maine Public Utilities Commission v. Central Maine Power Company, on behalf of Maine Committee for Utility Rate Reform, regarding a residential rate design based on a long-run incremental cost of generation.

1978: Before the Rhode Island Public Utilities Commission v. Newport Electric Corporation, on behalf of low income intervenors, regarding the calculation of the long-run incremental cost of generation for the N.E. Power Pool and application to the design of residential tariffs.

1977: Before the Vermont Public Service Board v. Central Vermont Public Service Corporation, on behalf of the Vermont Low Income Advocacy Council, regarding a redesign of the residential tariff.