



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

03/20/26
03:55 PM
A2503010

Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2026. (U 39 M)	A.25-03-010 (Filed March 20, 2025)
And Related Matters.	A.25-03-011 A.25-03-012 A.25-03-013

**INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF UTILITY CONSUMERS' ACTION NETWORK**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at compcoordinator@cpuc.ca.gov.

Intervenor: Utility Consumers' Action Network	For contribution to Decision (D.) D.25-12-043
Claimed: \$116,242.50	Awarded: \$
Assigned Commissioner: Alice Reynolds	Assigned ALJ: Jonathan Lakey
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Jane Krikorian
Date: 2/20/2026	Printed Name: Jane Krikorian

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	D.25-12-043 – this decision established the ratemaking cost of capital for Pacific Gas and Electric Company (PG&E), Southern California Gas Company, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	June 25, 2025	
2. Other specified date for NOI:		
3. Date NOI filed:	July 25, 2025	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.23-12-008	
6. Date of ALJ ruling:	June 18, 2025	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.23-12-008	
10. Date of ALJ ruling:	June 18, 2025	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-12-043	
14. Date of issuance of Final Order or Decision:	December 22, 2025	
15. File date of compensation request:	February 20, 2025	
16. Was the request for compensation timely?		

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor’s Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p><u>Summary of Participation</u> UCAN utilized the services of two experts, one for the proxy group and financial modeling analyses and another for additional risk factors analyses. Because UCAN represents ratepayers in the SDG&E service territory, its testimony and analyses focused for the most part on the application and claims of SDG&E.</p> <p><u>ISSUES:</u></p> <p><u>1. Capital Structure</u></p> <p>UCAN opposed SDG&E’s proposal to align its capital structure with SDG&E’s actual five-year average arguing that “ratepayers would have to pay more due to a higher cost of capital from more equity in the capital structure compared to the current authorized structure.”</p>	<p><u>UCAN Documents cited to:</u></p> <ul style="list-style-type: none"> -Ex. UCAN-01 Direct Testimony of Matthew Bandyk -Ex. UCAN-02 Direct Testimony of Dr. Karl Pavlovic -Ex. UCAN-04 Rebuttal Testimony of Dr. Karl Pavlovic -UCAN Opening Brief -UCAN Reply Brief -UCAN Opening Comments on Proposed Decision <p>UCAN Opening Brief (UCAN OB) at 15.</p>	

<p>UCAN also maintained that it was Commission policy to authorize an IOU capital structure that was in the public interest of the ratepayers of California.</p> <p>Additionally, UCAN pointed out that SDG&E failed to provide justification to increase the equity in its capital structure and recommended the Commission authorize a capital structure of 52% common equity and 48% debt.</p> <p>The Commission cited to UCAN's arguments in the final decision.</p> <p>The Commission agreed with UCAN and other intervenors and denied SDG&E's request to increase its common equity, keeping it at 52%.</p>	<p>Exhibit (Ex.) UCAN-01 at 22, lines 11-17, citing to D.19-12-056 at 11.</p> <p>UCAN OB at 16, and see fn. 37 citing to Ex. UCAN-01 at 22, lines 21-24.</p> <p>UCAN OB at 16, and see fn. 38 citing to Ex. UCAN-01, Table 1 at 3.</p> <p>UCAN Reply Brief (UCAN RB) at 3-4.</p> <p>D.25-12-043 at 17, and see fn's 63 and 65, citing to UCAN OB at 15 and [16] respectively.</p> <p>D.25-12-043 at 18 and see Conclusions of Law #6 and #7 at 69.</p>	
<p><u>2. Return on Common Equity-</u></p> <p>Proxy Groups:</p> <p>To assist the Commission in arriving at a fair ROE, UCAN began its financial modeling with the same proxy companies as SDG&E, but used two additional screens: 1) removing companies that did not provide electric and gas service and 2) removing companies rated greater than A by S&P. UCAN argued that these two screens brought the proxy group closer to the operational profile of SDG&E and with comparable risks.</p>	<p>Ex. UCAN-01 at 9-10. UCAN OB at 10.</p>	

<p>The decision noted UCAN’s proxy group.</p> <p>The Commission did not determine that one proxy group was better than another, but did provide explanations for certain characteristics of a proxy group and how they should be used in the financial modeling.</p> <p>The decision recognized UCAN’s proxy group as one of many that met the Commission’s criteria in order to provide ROE recommendations.</p>	<p>D.25-12-043 at 25, and see fn. 91 citing to Ex. UCAN-01 at 9-10.</p> <p>D.25-12-043 at 23-24 and see Conclusions of Law #’s 9-11 at 69.</p> <p>D.25-12-043 at 23-26.</p>	
<p><u>3. Return on Common Equity-Financial Models:</u></p> <p>Capital Asset Pricing Model (CAPM)</p> <p>UCAN included a CAPM analysis in its financial modeling as part of its overall ROE recommendation.</p> <p>The decision noted UCAN’s CAPM result.</p> <p>The Commission did not determine that any party’s CAPM final figure was the correct one to use for the ROE analysis. Instead, the Commission recognized each party’s different subjective inputs and provided a tabulation summarizing the simple average result of the CAPM variations calculated by the individual parties,</p>	<p>Ex. UCAN-01 at 9, 11-17 and see Ex’s MJB-3 and MJB-4 attached to Ex. UCAN-01. Also see UCAN OB at 12-13.</p> <p>D.25-12-043 at 28, and see fn. 106 citing to Ex. UCAN-01 at 9.</p> <p>D.25-12-043 at 27-28.</p>	

<p>including UCAN, to help in its final ROE determination.</p>		
<p><u>4. Return on Common Equity - Financial Models:</u></p> <p>Discounted Cash Flow (DCF)</p> <p>UCAN included a DCF analysis in its financial modeling as part of its overall ROE recommendation.</p> <p>The decision noted UCAN’s DCF final result.</p> <p>Again, the Commission did not determine that any one party’s DCF final figure was the correct one to use for the ROE analysis. Instead, the Commission recognized each party’s different subjective inputs and provided a tabulation summarizing the simple average result of different versions of the DCF model calculated by the individual parties, including UCAN, to help in its final ROE determination.</p> <p>The Commission noted that “none of the parties agree with the financial modeling results of the others.” The decision then spent several pages discussing results of the parties’ analyses, noting that the “utilities’ analyses generally yield higher results than the intervenor analyses, regardless of the model used.”</p> <p>The decision cites multiple parties and their positions,</p>	<p>Ex. UCAN-01 at 9, 17-20 and see Ex’s MJB-6 and MJB-7 attached to Ex. UCAN-01. Also see UCAN OB at 10-12.</p> <p>D.25-12-043 at 31, and see fn. 127 citing to Ex. UCAN-01 at 9.</p> <p>D.25-12-043 at 30-31.</p> <p>D.25-12-043 at 31.</p> <p>D.25-12-043 at 32-35.</p>	

<p>including UCAN regarding the BYRP method, as the Commission acknowledges the various analyses and builds the record toward its final ROE decision.</p>	<p>D.25-12-043 at 35, and see fn. 145 citing to Ex. UCAN-01 at 20.</p>	
<p><u>5. Return on Common Equity –</u></p> <p>Additional Risk Factors: Financial, Business and Regulatory Risks</p> <p>The Commission also considered additional risk factors not specifically included in the financial models to help determine the final ROE figure. The decision describes these additional risk factors as falling into three categories: financial, business, and regulatory.</p> <p>UCAN argued that the business, financial and regulatory risks cited by SDG&E as relevant justification for a higher ROE were already fully accounted for in SDG&E’s current credit ratings from S&P, Moody’s and Fitch, and were therefore irrelevant to SDG&E’s cost of capital application.</p> <p>UCAN argued SDG&E failed to provide evidence of its unique and above average risks.</p> <p>UCAN’s final recommendation to the Commission was to find that the risks cited by SDG&E had no demonstrable impact on SDG&E’s cost of capital and its request for an increase in its</p>	<p>D.25-12-043 at 35-45.</p> <p>D.25-12-043 at 35.</p> <p>See Ex. UCAN-02 in general, and see Attachments KRP-2 and KRP-3.</p> <p>Ex. UCAN-02 at 8-9.</p> <p>Ex. UCAN-02 at 4-5, 14.</p>	

<p>ROR and ROE should not be granted.</p> <p>While not citing to UCAN in this section of the decision, in its rebuttal testimony UCAN noted that the testimonies of EDF and TURN (both cited in this section) were closely aligned and supportive of UCAN’s conclusions regarding lack of evidence to support claimed unique risks.</p> <p>In the end, the Commission agreed with UCAN and other parties who argued that the ROE should not be set in the upper ranges of what the utilities proposed due to additional risk factors.</p> <p>All of the ROEs for the utilities were set lower than the utilities requested.</p>	<p>See D.25-12-043 at 39-40 citing to TURN and EDF regarding Applicants and then compare with Ex. UCAN-02 and Ex. UCAN-04 regarding SDG&E.</p> <p><i>“Based on the above financial, business, and regulatory risks discussion, we conclude that the ROE ranges adopted in this proceeding from the various financial models adequately compensate the utilities for these risks.”</i></p> <p>D.25-12-043 at 45, and see Conclusions of Law #15.</p> <p>D.25-12-043 at 49-53.</p>	
<p><u>6. Return on Common Equity –</u></p> <p>SDG&E’s Return on Equity</p> <p>After reviewing and citing to UCAN’s and other intervenors financial modeling and risk factor analyses, the Commission reduced the ROE authorization for the Applicants 30 basis points from the previous authorization in D.24-10-008.</p> <p>For SDG&E, the final decision found that its ROE should be within the range of 9.60% - 10.15% and that the just and reasonable ROE for SDG&E’s</p>	<p>D.25-12-043 at 49.</p> <p>D.25-12-043 at 53.</p>	

<p>authorized test year 2026 was 9.93%.</p> <p>UCAN continued to urge the Commission to reject SDG&E's DCF and CAPM results due to the use of unrealistic growth rates in both models resulting in an unreasonably high ROE range. The Commission did not reject the models and included the resulting ROEs in the final range.</p> <p>The final decision included UCAN's ROE proposal of 8.87% in its summary table. The ROE proposals ranged from a low of 6.15% (SC/PCF) to a high of 11.25% (SDG&E).</p> <p>UCAN believes its financial models and risk factor analyses, cited numerous times as demonstrated above, contributed to the record of this proceeding and aided the Commission in coming to its appropriate range and final just and reasonable ROE figure.</p>	<p>Opening Comments of UCAN on Proposed Decision at 3-5.</p> <p>D.25-12-043 at 52-53, and see fn. 219 citing to Ex. UCAN-01 at 3.</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN, EDF		
<p>d. Intervenor’s claim of non-duplication: For this Cost-of-Capital proceeding, UCAN worked with a team of experts to review SDG&E’s claims and provide financial modeling and risk analyses that was distinct from other intervenors. In the early stages of the proceeding, UCAN met with TURN, PCF and Cal Advocates to discuss non-duplication of efforts (see timesheet entries for 7/16/25; 7/17/25; and 7/18/2025 respectively) Additionally, UCAN provided unique modeling for its ROE recommendations. For example, UCAN started with the same proxy group as SDG&E but screened out 12 companies for owning only electric and not gas utilities. Other intervenors used the same proxy group as SDG&E. The financial models are applied to these proxy groups so by using a unique proxy group UCAN was able to provide a unique ROE. The final decision acknowledged that parties already use unique assumptions in their financial models, including time periods (D.25-12-043 at 26) and acknowledged UCAN’s unique proxy group, as well.</p> <p>Another example of non-duplication and unique argument is regarding the issue of capital structure. Other intervenors argued it was not cost-justified (EPUC/IS) or that the equity ratio exceeds that of comparable utilities (Cal Advocates). UCAN focused on Commission policy citing a previous decision in testimony (D.19-12-056) stating it was Commission policy to authorize an IOU’s capital structure in the public interest of ratepayers and that higher equity meant higher costs for ratepayers (see Issue 1 in Part II (A) above).</p> <p>On most issues, UCAN was able to provide a unique perspective and evidence that added to the record. UCAN’s work aided the Commission’s analyses and discussions in determining the final ROE figure, capital structure and additional risks. UCAN urges the Commission to find any duplication of effort minor and therefore reasonable.</p>		

² The Office of Ratepayer Advocates was renamed the Public Advocate’s Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? ²	Yes	

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
<p>a. Intervenor's claim of cost reasonableness:</p> <p>UCAN seeks a total intervenor compensation award of \$116,242.50 as the reasonable cost of its participation in this proceeding. This amount includes time for UCAN's attorneys, experts, and support staff. UCAN urges the Commission to find these costs reasonable in light of its substantial contribution to the record detailed in Part II (A) above.</p> <p>Participating in the Cost-of-Capital proceeding is an important part of UCAN's advocacy for the ratepayers served by SDG&E in San Diego County. This proceeding examines critical components of the costs of running SDG&E's electric and gas distribution, transmission and generation procurement functions. When SDG&E claims it needs to increase its equity percentage and needs a higher rate-of-return on this equity in order to operate, this has a corresponding effect on rates paid by San Diego ratepayers. UCAN's role as a ratepayer advocate is to examine these claims made by SDG&E to ensure the increases are justified and reasonable. As shown above in the substantial contribution section, UCAN was successful in arguments to maintain a lower amount of equity in the capital structure thus saving ratepayers an unjustified increase. UCAN was also successful in the Commission's decision to lower the ROE from SDG&E's initial request. Had UCAN and other intervenors not succeeded, SDG&E claimed its proposals would have increased the revenue</p>	

	CPUC Discussion
<p>requirement by nearly \$100 million (see SDG-01, Direct Testimony of Valerie Bille, at VAB-2). While UCAN does not have the exact savings figure, keeping the capital structure at 52% instead of the requested 54%, and authorizing a ROE of 9.93% instead of the requested 11.25%, undoubtedly saved millions of dollars for ratepayers. Due to these significant savings on behalf of San Diego’s ratepayers, UCAN urges the Commission to find the cost of its participation reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>In this proceeding, UCAN is claiming 157.25 hours of time for UCAN attorneys, 95.5 amount of time for the Synapse Team, and 64 amount of time for PCMG and Associates, LLC. Synapse and PCMG are the experts hired by UCAN to help with the analyses of SDG&E’s application. The hours listed here are for the substantive work in this proceeding and exclude hours for NOI and intervenor compensation preparation.</p> <p>The work done by UCAN thoroughly examined SDG&E’s claims stating that in order to continue operating its electric and gas businesses it required a higher percentage of equity in its capital structure and a higher return on equity than it was currently receiving. If granted, both of these requests would have impacted ratepayers by increasing overall rates by nearly \$100 million dollars (see SDG-01, Direct Testimony of Valerie Bille, at VAB-2).</p> <p>UCAN used the services of two technical teams and divided tasks in such a way as to maximize the expertise of each team and provide ratepayers with a strong voice at the Commission for just and reasonable rates. For example, UCAN asked the Synapse Team to focus on the capital structure and ROE issues while the PCMG expert focused on the business, financial and regulatory risk issues. In this way, UCAN avoided duplication of effort and used the skills of each team effectively. Additionally, UCAN assigned one attorney (Ms. Krikorian) to work with the Synapse Team and another attorney (Mr. Lopez) to work with the PCMG expert. This further avoided duplication of effort and maximized hours spent on the different areas of focus.</p> <p>UCAN fully participated in this proceeding submitting opening and rebuttal testimony, filing a motion for evidentiary hearings, participating in evidentiary hearings and cross-examination, filing opening and reply briefs and providing comments on the proposed decision. Based on the results described in Section II (A) above, UCAN believes its work saved ratepayers many millions of dollars. UCAN urges the Commission to find the hours spent providing successful analyses and arguments reasonable.</p>	

		CPUC Discussion																																	
<p><u>Timesheets and Allocation of hours</u> – an effort was made to break out time by the issues listed in Part II (A) – Substantial Contribution. Time was also broken out by Initial Preparation (IP), Identifying Issues (II), and Preparing and Presenting (PP) – a “catch-all” for different proceeding-related tasks. These categories are to help reflect how UCAN spent its time and made its substantial contribution. UCAN urges the Commission to find these hours reasonable and necessary to provide a meaningful voice for ratepayers at the Commission.</p> <p><u>Additional Comments on Timesheets and hours</u> – UCAN worked diligently to comply with the IComp Program at 25 and avoid vagueness and/or combining tasks. UCAN asks that where there has been an oversight of this directive to find it minimal and therefore reasonable.</p>																																			
<p>c. Allocation of hours by issue:</p> <table border="1"> <thead> <tr> <th>Issue</th> <th>Hours</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Capital Structure</td> <td>14.75</td> <td>5%</td> </tr> <tr> <td>Financial, Business, Regulatory Risks</td> <td>73.25</td> <td>23%</td> </tr> <tr> <td>Financial Models – CAPM</td> <td>23.50</td> <td>7%</td> </tr> <tr> <td>Financial Models-DCF</td> <td>38</td> <td>12%</td> </tr> <tr> <td>Identifying Issues</td> <td>54.25</td> <td>17%</td> </tr> <tr> <td>Initial Preparation</td> <td>35.50</td> <td>11%</td> </tr> <tr> <td>Preparing and Presenting</td> <td>24.75</td> <td>8%</td> </tr> <tr> <td>Proxy Group</td> <td>10.75</td> <td>3%</td> </tr> <tr> <td>ROE Overall</td> <td>42</td> <td>13%</td> </tr> <tr> <td></td> <td>316.75</td> <td>100%</td> </tr> </tbody> </table>		Issue	Hours	Percentage	Capital Structure	14.75	5%	Financial, Business, Regulatory Risks	73.25	23%	Financial Models – CAPM	23.50	7%	Financial Models-DCF	38	12%	Identifying Issues	54.25	17%	Initial Preparation	35.50	11%	Preparing and Presenting	24.75	8%	Proxy Group	10.75	3%	ROE Overall	42	13%		316.75	100%	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2025	104.25	\$545	See Comment 1	\$56,816.25			
Edward Lopez	2025	53	\$485	See Comment 2	\$25,705.00			
Matthew Bandyk (Consultant Synapse)	2025	81.75	\$325	See Comment 3	\$26,568.75			

CLAIMED						CPUC AWARD		
Aidan Glaser-Schoff (Consultant Synapse)	2025	5.5	\$215	See Comment 4	\$1,182.50			
Caroline Resor (Consultant Synapse)	2025	7.5	\$270	See Comment 5	\$2,025.00			
Melissa Whited (Consultant Synapse)	2025	0.75	\$390	See Comment 6	\$292.50			
Karl Pavlovic (Consultant PCMG)	2025	64	\$915	See Comment 7	\$58,560.00			
Subtotal: \$112,590.00						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Jane Krikorian	2025	2	\$272.50	½ requested 2025 rate	\$545.00			
Jane Krikorian	2026	11	\$282.50	½ requested 2025 rate	\$3,107.50			
Subtotal: \$3,652.50						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1.								

CLAIMED			CPUC AWARD
2.			
<i>Subtotal: \$</i>			<i>Subtotal: \$</i>
<i>TOTAL REQUEST: \$116,242.50</i>			<i>TOTAL AWARD: \$</i>

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Edward Lopez	December 20, 1991	157052	No
Jane Krikorian	January 3, 2025	359865	No

**C. Attachments Documenting Specific Claim and Comments on Part III:
*(Intervenor completes; attachments not attached to final Decision)***

Attachment or Comment #	Description/Comment
Attachments	Certificate of Service UCAN's Timesheet Attachment A Synapse Energy Consultant Agreement Attachment B PCMG Consultant Agreement Attachment C Jane Krikorian Resume Attachment D Matthew Bandyk Attachment E Aidan Glaser Schoff Attachment F Caroline Resor Attachment G Melissa Whited
Comment 1 Rate Request	<u>Request for 2025 Hourly Rate Pursuant to Resolution ALJ-393</u> UCAN Representative: Jane Krikorian

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
for Jane Krikorian	<p>Labor Role: Legal – Attorney Level: III (5-10 yrs experience) 2025 Hourly Rate Range (estimated): \$379 - \$589 Requested Hourly Rate: \$545</p> <p>UCAN requests a new rate for Ms. Jane Krikorian in the Attorney category based on her recent admittance to the California Bar in January 2025. Ms. Krikorian’s previous categorization was set in 2021 per D.21-12-050 as an Expert: Public Policy Analyst, Level III. Due to Ms. Krikorian’s legal experience and years practicing before the Commission, UCAN requests Ms. Krikorian be placed in the Attorney category also at Level III.</p> <p>Ms. Krikorian has 17 years of legal experience, with the past 11 years at UCAN steadily increasing her responsibilities and practice experience before the Commission. Prior to joining UCAN and after receiving her Juris Doctorate in 2010, Ms. Krikorian spent several years as a law clerk at the Legal Aid Society of San Diego assisting in the administrative law areas of the Internal Revenue Service (IRS) and Social Security Administration (SSA). While in law school at California Western School of Law, Ms. Krikorian gained extensive legal research experience working as a law clerk for constitutional law professor Michael R. Belknap (2008-2010). Her resume is included as Attachment C to this compensation request.</p> <p>In February 2014, Ms. Krikorian was hired at UCAN. Since then, she has increased her responsibilities and practice experience before the Commission. This includes increased involvement in UCAN’s overall advocacy strategies and efforts to contain the increasing costs of electricity on behalf of ratepayers. Ms. Krikorian has helped develop UCAN’s legal and policy positions in numerous energy-related proceedings including Integrated Resource Planning, Power Charge Indifference Adjustment, Transportation Electrification, and more recently the Rulemaking to Advance Demand Flexibility through Electric Rates and the Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. Ms. Krikorian has been involved in several General Rate Cases and Cost-of-Capital proceedings. Ms. Krikorian’s involvement in proceedings includes working with expert consultants and witnesses to develop and file testimony, preparing for evidentiary hearings and cross-examining witnesses, writing briefs and submitting comments on Commission rulings and proposed decisions. Ms. Krikorian continues to develop her expertise at the Commission with her recent involvement in proceedings on safety, reliability and ratesetting.</p> <p>The Market Rate Study Hourly Rate Chart lists that an Attorney in Level III should have a JD or equivalent degree, 5-10 years of experience, and be</p>

Attachment or Comment #	Description/Comment
	<p>licensed to practice law. It also notes that, “Higher experience levels should have experience with areas of law and procedures relevant to CPUC matters...” Due to Ms. Krikorian’s 11 years at UCAN and relevant experience of practicing in front of the Commission, her JD and recent admittance to the CA State Bar, UCAN requests Ms. Krikorian’s rate be established at \$545 which should be between the Median Range and High Range for 2025. UCAN believes this is a just and reasonable rate based on the parameters of the Market Rate Study for an Attorney Level III and Ms. Krikorian’s education, higher experience level and recent admittance to the California State Bar. UCAN appreciates the Commission’s consideration of this request for Ms. Krikorian.</p> <p>Rate Request for 2026: UCAN requests a 2026 rate for Ms. Krikorian of \$565.</p> <p>This rate is derived by applying the proper escalation rates of 3.35% for 2026, as published by the Commission in the 2026 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02102026.xlsm).</p> <p>The resulting 2026 rate is \$563.25 rounded up to the nearest \$5, equals \$565. $[\\$545 \times 1.0335 = \\$563.25 \text{ rounded up to the nearest } \\$5 \text{ increment} = \\$565]$.</p>
<p>Comment #2 Rate Escalation Request for Edward Lopez</p>	<p>2025: UCAN requests a 2025 rate for Mr. Lopez of \$485.</p> <p>This rate is derived by applying the proper escalation rate of 3.46% for 2025, as published by the Commission in the 2025 version of the hourly rate chart for intervenor compensation (see https://www.cpuc.ca.gov/-/media/cpucwebsite/divisions/administrative-law-judge-division/documents/icompmaterials/hourlyratechart-02132025.xlsm).</p> <p>The resulting 2025 rate is \$491.44 rounded up to the nearest \$5, equals \$495. $[\\$475 \times 1.0346 = \\$491.44 \text{ rounded up to the nearest } \\$5 \text{ increment} = \\$495]$.</p> <p>The CPUC approved rate category for Mr. Lopez is “Advocate – Executive Director – V.” Because rate for the category is capped at \$488 for 2025, UCAN requests the highest \$5 increment within the rate category of \$485 instead of the calculated escalation of \$495.</p>
<p>Comment #3 Rate Request</p>	<p>UCAN requests a 2025 hourly rate of \$325 for Expert Matthew Bandyk. Mr. Bandyk worked as a Principal Associate at Synapse Energy Economics</p>

Attachment or Comment #	Description/Comment
for Expert Matthew Bandyk	<p>and served as an expert consultant to UCAN in this proceeding. His resume is included as Attachment D to this compensation request.</p> <p>In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website (www.cpuc.ca.gov/icomp) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission further directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a supporting document, and (2) a justification for the requested rate that ties to the individual’s labor role and level of experience, per the Market Rate Study’s Hourly Rate Chart. (Res. ALJ-393, p. 5).</p> <p>Pursuant to the requirements of ALJ-393, UCAN hereby requests a 2025 hourly rate for Synapse Energy Economics Principal Associate Matthew Bandyk of \$325.</p> <p>Intervenor Representative: Matthew Bandyk Labor Role: Expert – Public Policy Analyst Level: III 2025 Hourly Rate Range: \$285.05 - \$490.57 Requested Hourly Rate: \$325 Current Resume: See Attachment D.</p> <p>UCAN requests an hourly rate of \$325 for Mr. Bandyk in 2025 which is well below the median (\$383.95) for a Level III Public Policy Analyst. Mr. Bandyk earned a Bachelor of Arts in political science from Davidson College and a Master of Business Administration (MBA) from the University of Michigan.</p> <p>Mr. Bandyk was a Principal Associate at Synapse Energy Economics from January 2025 – January 2026. Prior to joining Synapse, he worked as a consultant at 5 Lakes Energy from September 2021 – December 2024, and as a Clean Energy Consultant at Bandyk Consulting LLC from January 2019 – September 2021. Earlier in his career, he worked in financial services and as a reporter covering energy and financial markets for S&P Global Market Intelligence/SNL Financial.</p> <p>Mr. Bandyk specializes in financial and regulatory analysis in utility proceedings, particularly issues related to cost of capital and return on equity. He performs financial analysis in regulatory cases, prepares expert testimony, and summarizes complex technical concepts for clients, regulators, and public audiences. He has provided direct testimony before</p>

Attachment or Comment #	Description/Comment
	<p>the Michigan Public Service Commission in numerous electric and gas rate cases on behalf of consumer and environmental advocates.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an “Public Policy Expert” in Level III should have a bachelor's degree and 5-10 years of experience. Mr. Bandyk possesses a bachelor’s degree in political science and an MBA. With respect to years of experience, his relevant work history (as shown in Attachment D) demonstrates more than six years of direct experience in utility regulatory and energy consulting roles, in addition to earlier professional experience in energy market analysis and financial reporting. UCAN submits that an hourly rate of \$325, which is well below the median rate for a Public Policy Analyst in Level III, is entirely reasonable for Mr. Bandyk for 2025.</p>
<p>Comment #4 Rate Request for Expert Aidan Glaser Schoff</p>	<p>UCAN requests a 2025 hourly rate of \$215 for Expert Aidan Glaser Schoff. Mr. Glaser Schoff works as a Senior Associate at Synapse Energy Economics and served as an expert consultant to UCAN in this proceeding. His resume is included as Attachment E to this compensation request. In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website (www.cpuc.ca.gov/icomp) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission further directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a supporting document, and (2) a justification for the requested rate that ties to the individual’s labor role and level of experience, per the Market Rate Study’s Hourly Rate Chart. (Res. ALJ-393, p. 5). Pursuant to the requirements of ALJ-393, UCAN hereby requests a 2025 hourly rate for Synapse Energy Economics Associate Aidan Glaser Schoff of \$215.</p> <p>Intervenor Representative: Aidan Glaser Schoff Labor Role: Expert – Economist Level: III 2025 Hourly Rate Range: \$206.52 - \$354.06 Requested Hourly Rate: \$215 Current Resume: See Attachment E. Justification for the Requested Hourly Rate UCAN requests an hourly rate of \$215 for Mr. Glaser Schoff in 2025 which is well below the median (\$273.74) for a Level III Economist. Mr. Glaser</p>

Attachment or Comment #	Description/Comment
	<p>Schoff earned a bachelor’s degree in Physics at Vassar College and a master’s degree in agricultural and applied economics (with a concentration in Resource and Energy Demand analysis) at the University of Wisconsin-Madison.</p> <p>Mr. Glaser Schoff has worked at Synapse Energy Economics as an Associate since the summer of 2023. His work includes analysis of rate design proposals and cost of service studies using quantitative methods. Prior to working at Synapse, he was a Staff Economist at Christensen Associates where his work included surveys of utility tariffs, performance-based regulation of electric utilities, and the load impacts of alternative rate designs at San Diego Gas & Electric. Prior to working at Christensen Associates, he served as an intern at Guidehouse consulting evaluating load impacts of a smart thermostat program and performed physics research at the University of Arkansas and University of Tennessee.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an “Economist” in Level III should have a bachelor’s degree and 5-10 years of experience. Mr. Glaser Schoff possesses a bachelor’s degree in physics and a master’s degree in economics. With respect to years of experience, his relevant work history (as shown in Attachment E) demonstrates approximately three years of relevant work history prior to arriving at Synapse, and two additional years at Synapse, for a total of 5 years of relevant experience. UCAN submits that an hourly rate of \$215, which is well below the median rate for an Economist in Level III, is entirely reasonable for Mr. Glaser Schoff for 2025.</p>
<p>Comment #5 Rate Request for Expert Caroline Resor</p>	<p>UCAN requests a 2025 hourly rate of \$270 for Expert Caroline Resor. Ms. Resor works as a Senior Associate at Synapse Energy Economics and served as an expert consultant to UCAN in this proceeding. Her resume is included as Attachment F to this compensation request.</p> <p>In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website (www.cpuc.ca.gov/icompl) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission further directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a supporting document, and (2) a justification for the requested rate that ties to the individual’s labor role and level of experience, per the Market Rate Study’s Hourly Rate Chart. (Res. ALJ-393, p. 5).</p>

Attachment or Comment #	Description/Comment
	<p>Pursuant to the requirements of ALJ-393, UCAN hereby requests a 2025 hourly rate for Synapse Energy Economics Senior Associate Caroline Resor of \$270.</p> <p>Intervenor Representative: Caroline Resor Labor Role: Expert – Public Policy Analyst Level: II 2025 Hourly Rate Range: \$204.98 - \$348.40 Requested Hourly Rate: \$270 Current Resume: See Attachment F.</p> <p>Justification for the Requested Hourly Rate UCAN requests an hourly rate of \$270 for Ms. Resor in 2025 which is near the median (\$271.94) for a Level II Public Policy Analyst. Ms. Caroline Resor holds a dual M.S. in Environmental Policy and MBA in Business Administration from University of Michigan and a B.A. in Environmental Studies from Dartmouth College.</p> <p>Ms. Resor has five years of relevant professional experience in addition to her two master’s degrees. She has worked at Synapse Energy Economics as a Senior Associate since the fall of 2024. Ms. Resor provides expert witness and consulting services on behalf of public interest clients in regulatory proceedings and writes reports and testimony on various electricity-sector issues including clean energy and climate policy and resource planning. Prior to joining Synapse, Ms. Resor was a Strategy Associate at the American Flood Coalition in Washington, DC for two years from 2019 – 2021. In addition, from 2017 to 2019, Ms. Resor managed a portfolio of solar and wind energy assets at HASI (formerly Hannon Armstrong) and supported investment research and screening on a variety of renewable energy portfolio transactions. Ms. Resor has also had a number of relevant graduate internships that compliment her professional experience. She was a Graduate Researcher at the Graham Sustainability Institute at the University of Michigan (January – July 2024), a Summer Associate at RMI regarding utility business models and ratemaking (June-August 2023), a Summer Associate regarding solar development policy & strategy at Cypress Creek Renewables (June-August 2022), and a local government consultant for the Howard County, Maryland Department of Emergency Management as part of the NASA DEVELOP program for the summer of 2019.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an “Public Policy Analyst” in Level II should have a bachelor’s degree and 2-5 years of experience. Ms. Resor possesses a bachelor’s degree in environmental studies and a dual M.S. in Environmental Policy and MBA in Business Administration. With respect to years of experience, her relevant work history (as shown in Attachment F) demonstrates approximately 4 years of relevant work history prior to arriving at Synapse, and 1 additional year at Synapse, for 5 years of relevant experience. UCAN submits that an hourly</p>

Attachment or Comment #	Description/Comment
	<p>rate of \$270, which is close to the median rate for a Public Policy Analyst in Level II, is entirely reasonable for Ms. Resor for 2025.</p>
<p>Comment #6 Rate Request for Expert Melissa Whited</p>	<p>UCAN requests a 2025 hourly rate of \$390 for Expert Melissa Whited. Ms. Whited works as a Vice President at Synapse Energy Economics and served as an expert consultant to UCAN in this proceeding. Her resume is included as Attachment G to this compensation request.</p> <p>In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website (www.cpuc.ca.gov/icompl) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission further directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a supporting document, and (2) a justification for the requested rate that ties to the individual’s labor role and level of experience, per the Market Rate Study’s Hourly Rate Chart. (Res. ALJ-393, p. 5).</p> <p>Pursuant to the requirements of ALJ-393, UCAN hereby requests a 2025 hourly rate for Synapse Energy Economics Vice President Melissa Whited of \$390.</p> <p>Intervenor Representative: Melissa Whited Labor Role: Expert – Public Policy Analyst Level: IV 2025 Hourly Rate Range: \$324.16 - \$554.42 Requested Hourly Rate: \$390 Current Resume: See Attachment G. Justification for the Requested Hourly Rate</p> <p>UCAN requests an hourly rate of \$390 for Ms. Whited in 2025 which is below the median (\$433.64) for a Level IV Public Policy Analyst. Ms. Whited earned a Bachelor of Arts in international studies at Southwestern University, a Master of Science in Environment and Resources at the University of Wisconsin, and a Master of Arts in Agricultural and Applied Economics at the University of Wisconsin.</p> <p>Ms. Whited began working at Synapse Energy Economics in 2005, left in 2008 to attend graduate school, and rejoined in 2012. Her roles have evolved from Communications Manager to Associate to Senior Associate to Principal Associate to Senior Principal to her current role as Vice President. She specializes in issues related to utility regulation and rate design, particularly in response to fundamental changes in the electricity industry spurred by declining energy use and rapidly increasing penetration of</p>

Attachment or Comment #	Description/Comment
	<p>distributed energy resources. Ms. Whited consults on the tools to effectively address these changes, including performance-based regulation, revenue decoupling mechanisms, distribution system planning, and innovative rate design. She has testified before seventeen state public utility commissions, the Nova Scotia Energy Board, the Newfoundland and Labrador Board of Commissioners of Public Utilities, and the Federal Energy Regulatory Commission.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an “Public Policy Expert” in Level IV should have a master's degree or MBA and 10-15 years of experience. Ms. Whited possesses a bachelor’s degree in international studies and two master’s degrees (Environmental Resources, Agricultural and Applied Economics). With respect to years of experience, her relevant work history (as shown in Attachment G) demonstrates approximately 17 years of relevant work history at Synapse (14 of which were in a consulting role) and one year of experience teaching environmental economics. UCAN submits that an hourly rate of \$390, which is below the median rate for a Public Policy Analyst in Level IV, is entirely reasonable for Ms. Whited for 2025.</p>
<p>Comment #7 Rate Escalation of Expert Dr. Karl Pavlovic</p>	<p>UCAN received an approved 2022 rate for Dr. Karl Pavlovic for his work done in D.24-01-019 at the rate of \$815. In 2023 the Commission approved a COLA rate escalation of 4.46%, in 2024 the Commission approved a 4.07% escalation and in 2025 the Commission approved a 3.46% escalation. UCAN requests that Dr. Pavlovic rate for 2025 to be \$915 based on the COLA escalations since his 2022 approved rate of \$815. Please see below for calculations.</p> <p>2022-\$815 2023-\$815x4.46%=\$851.35 rounded to the nearest \$5= \$850 2024-\$885x4.07%=\$884.60 rounded to the nearest \$5=\$885 2025-\$885*3.46%=915.62 rounded to the nearest \$5=\$915</p>

D. CPUC Comments, Disallowances, and Adjustments (*CPUC completes*)

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **UTILITY CONSUMERS' ACTION NETWORK** [has/has not] made a substantial contribution to **D.25-12-043**.
2. The requested hourly rates for **UTILITY CONSUMERS' ACTION NETWORK**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$ _____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **UTILITY CONSUMERS' ACTION NETWORK** is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **UTILITY CONSUMERS' ACTION NETWORK** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **UTILITY CONSUMERS' ACTION NETWORK** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **UTILITY CONSUMERS' ACTION NETWORK**'s request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.25-12-043		
Proceeding(s):	A.25-03-010, A.25-03-011, A.25-03-12, A.25-03-013		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Utility Consumers' Action Network	2/20/2026	\$116,242.50		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Jane	Krikorian	Attorney	\$545	2025	
Jane	Krikorian	Attorney	\$565	2026	
Edward	Lopez	Attorney	\$490	2025	
Karl	Pavlovic	Expert	\$915	2025	
Matthew	Bandyk	Expert	\$325	2025	
Caroline	Resor	Expert	\$270	2025	
Alan	Schoff	Expert	\$215	2025	
Melissa	Whited	Expert	\$390	2025	

Revised March 2023

(END OF APPENDIX)

UCAN Timesheet

Utility Consumers' Action Network A.25-03-010 Timesheet

Issues																
PP	Preparing and Presenting Issues															
IP	Initial Preparation															
II	Identify Issues															
1	Capital Structure															
2	ROE - Proxy Group															
3	ROE - CAPM															
4	ROE - DCF															
5	Additional Risks: Business, Financial, Regulatory															
6	ROE Overall															
UCAN Staff Attorney Jane Krikorian																
Date	Issue	Hours	PP	IP	II	1	2	3	4	5	6					
4/9/2025	Reading SDG&E Cost-of-Capital Application	0.50		0.5												
4/9/2025	Reviewing initial draft of UCAN Protest	0.25		0.25												
4/10/2025	Researching Affordability reports to include data and statistics in protest	0.50	0.50													
4/10/2025	Reading Cal Public Advocates Office Report on Affordability issued Feb. 18, 2025	0.25			0.25											
4/10/2025	Reading Gov. Newsom EO-5-24 issued Oct 2024 on issue with electricity affordability in CA	0.25			0.25											
4/11/2025	Reading SDG&E Cost-of-Capital Testimony - Valerie Billie for issues to raise in protest	0.50			0.5											
4/11/2025	Researching located Regulatory Research Associates report on US utility average ROEs	0.25			0.25											
4/11/2025	Reading RRA report on US utility averages for Jan-June 2024 and Jan-Dec 2023	1.00			1											
4/11/2025	Writing substantive additions to current draft UCAN Protest including comparison tables	2.50	2.50													
4/14/2025	Researching previous cost-of-capital schedules including whether there were evidentiary hearings	1.00			1											
4/14/2025	Writing final draft of protest w recommended schedule and hearings	1.00	1.00													
4/15/2025	Zoom mtng w Ed Lopez to discuss issues and expert/consultant assistance	0.25		0.25												
4/15/2025	Researching current SDG&E application and previous cost-of-capital testimonies for issues to discuss w new consultants	1.00			1											
4/15/2025	Emailing Synapse with issue outline and request for assistance	0.75			0.75											
4/24/2025	Reading draft Agreement from Synapse	0.75		0.75												
4/24/2025	Writing background of CoFC proceeding and Scope of Requested Services	1.50	1.50													
4/24/2025	Emailing Executive Director to review draft agreement from Synapse and draft Scope of Requested Services	0.25		0.25												
4/24/2025	Emailing Synapse representative re: update on draft agreements	0.25	0.25													
4/29/2025	Attending In-house Staff Mtng to review Synapse contract and terms	0.25		0.25												
5/13/2025	Reviewing and make substantive changes to UCAN-Synapse Consulting Agreement	0.75	0.75													
5/13/2025	Emailing internal team to review Consulting Agreement with substantive changes	0.25	0.25													
5/14/2025	Attending internal team to discuss substantive changes to Consulting Agreement	0.25		0.25												
5/15/2025	Emailing Synapse Agreement with explanations about substantive changes	0.25	0.25													
5/27/2025	Finalizing UCAN-Synapse Consulting Agreement	0.75	0.75													
5/27/2025	Emailing internal team to review final changes to UCAN-Synapse Agreement before signing	0.25	0.25													
5/30/2025	Meeting w/consultant Matthew Bandyk to review issues to cover in testimony	1.00			1											
5/30/2025	Emailing follow-up discussion w/consultant re: research in use in testimony re:cost-shift issue	0.25		0.25												
5/30/2025	Emailing follow-up discussion w/consultant re: timesheet to use	0.25		0.25												
5/30/2025	Emailing follow-up discussion to set up meeting w/other UCAN consultant for non-duplication concerns	0.25		0.25												
6/9/2025	Attend teams meeting with UCAN experts and staff to determine which issues to cover in expert testimony	1.00			1											
6/9/2025	Reading Joint Statement sent by SCE for meet and confer mtng Tues June 10 2025	0.25		0.25												
6/9/2025	Reviewing UCAN Protest to see which issues to include in Joint Statement	0.25			0.25											
6/9/2025	Writing UCAN issues to add to joint statement	0.75	0.75													
6/9/2025	Sending an email to SCE with UCAN issues and to confirm contact information	0.25		0.25												
6/10/2025	Attending All-Party Meet and Confer to determine issues for joing prehearing conference statement	1.00			1											
6/12/2025	Writing substantive edits to draft Joint PHC Statement from meet and confer meeting	0.50	0.50													
6/12/2025	Emailing Ed Lopez to review and add substantive edits to Joint PHC Statement	0.25			0.25											
6/12/2025	Writing transfer edits to latest utility draft version of Joint PHC Statement	0.25	0.25													
6/12/2025	Emailing CoFC group with latest edits and explaining tracking of intervenor edits	0.25			0.25											
6/17/2025	Reading final draft PHC statement for approval to final substantive edits	0.25		0.25												
6/17/2025	Sending approval for final substantive edits to PHC Joint Stmtt for filing 6.18.25	0.25	0.25													
6/24/2025	Reviewing Joint PHC Stmtt in Preparation for PHC on 6/25/25 at 2 pm	0.25		0.25												
6/24/2025	Sending email to experts with Joint PHC Stmtt regarding Intervenor issues to begin planning for non-duplication of efforts	0.25		0.25												
6/25/2025	Attending prehearing conference to make appearances, discuss scope, schedule, categorization	1.25	1.25													
6/30/2025	Reviewing Data requests sent to SDGE from UCAN so far for testimony discussion re: issues	0.50	0.50													
6/30/2025	Attending Team Mtng w UCAN team to review testimonies, discuss issues and non-duplication within testimonies and with other parties' testimonies	0.50		0.5												
6/30/2025	Emailing several parties (TURN, PCF, Cal Advocates) for non-duplication discussions	0.25		0.25												
7/1/2025	to TURN requesting non-duplication mtng	0.25		0.25												
7/1/2025	to PCF requesting non-duplication mtng	0.25		0.25												
7/1/2025	Attending to Cal Adv requesting non-duplication mtng	0.25		0.25												
7/14/2025	Emailing to TURN setting non-duplication mtng	0.50		0.5												
7/14/2025	Emailing to PCF setting non-duplication mtng	0.50		0.5												
7/14/2025	Emailing to Cal Adv setting non-duplication mtng	0.50		0.5												
7/16/2025	Attending Teams mtng to discuss UCAN testimony with TURN and confirm areas of support and also areas of non-duplication	0.75		0.75												
7/17/2025	Reading Scoping Memo issued 7/16/25 for issues and due dates	0.25		0.25												
7/17/2025	Attending Teams mtng to discuss UCAN testimony with PCF and confirm areas of support and also areas of non-duplication	0.75		0.75												
7/17/2025	Attending Teams mtng with UCAN team to discuss progress of testimony, due dates for drafts, and delineating issues btwn testimonies	0.50		0.5												
7/18/2025	Attending Teams mtng, then WebEx, with Cal Adv to confirm areas of support an also areas of non-duplication	0.50		0.5												
7/21/2025	Writing NOI	2.00	2.00													
7/24/2025	Writing finalize facts and figures in NOI	0.50	0.50													
7/25/2025	Writing substantive edits to UCAN initial draft testimony from expert Matthew Bandyk	3.50				0.75	0.75	1	1							
7/25/2025	Emailing M. Bandyk w questions re: initial draft	0.25	0.25													
7/28/2025	Writing substantive edits to UCAN 2nd draft testimony from expert Matthew Bandyk	2.50				0.5	0.5	0.75	0.75							
7/28/2025	Emailing M. Bandyk w questions re: 2nd draft	0.25	0.25													
7/29/2025	Writing substantive edits to UCAN 3rd draft testimony from expert Matthew Bandyk	0.75				0.25		0.25	0.25							
7/29/2025	Emailing M. Bandyk w questions re: 3rd draft	0.25	0.25													
7/30/2025	Reviewing final draft of UCAN Testimony for any last minute substantive edits prior to filing	0.50						0.25	0.25							
8/4/2025	Reading Sierra Club/PCF testimony for content and possible issues for rebuttal testimony	0.75		0.75												
8/4/2025	Reading WTF testimony for content and possible issues for rebuttal testimony	0.75		0.75												
8/7/2025	Team mtng with expert Matthew Bandyk on ideas for rebuttal testimony	0.50		0.5												
8/15/2025	Reading TURN testimony for content and possible issues for rebuttal testimony	1.00		1												
8/15/2025	Reading Cal Advocates testimony for content and possible issues for rebuttal testimony	1.00		1												
8/15/2025	Reading draft rebuttal testimony for substantive edits re: risk premium model critiques	1.00				0.25	0.25	0.25	0.25							
8/18/2025	Reading draft rebuttal testimony for substantive edits re: discounted cash flow model critiques	0.50												0.5		
8/21/2025	Attending Meet and Confer with Utilities and Other Intervenor for M&C Report due 8/29/25	0.50		0.5												
8/22/2025	Writing Motion for evidentiary hearing due to disputed issues of material fact	1.50	1.5													
8/27/2025	Reading Stipulated facts sent by SDGE	0.25		0.25												
8/27/2025	Reading ALJ Ruling granting motion for EH including ALJ instructions	0.50		0.5												
8/27/2025	Emailing PGE regarding witness schedule and time for ex at EH	0.25		0.25												
8/28/2025	Phone call w/ counsel for PCF and Sierra Club discussing ex witnesses and time amount	0.25		0.25												
8/28/2025	Team mtng w/ expert M. Bandyk reviewing SDGE testimony for ex question development	1.00		1												
8/28/2025	phone call w counsel for PCF following up on ex witness and time	0.25		0.25												
8/28/2025	Reading updated list of stipulated facts and comments	0.25		0.25												
8/29/2025	Writing motion to admit exhibits	0.50	0.5													
8/29/2025	Editing excel sheet with links to UCAN exhibits for evidentiary hearing	0.25		0.25												
8/29/2025	Reading SDGE witness Nowak testimony for discounted cash flow analysis issues	1.50												1.5		
8/29/2025	Writing cross-examination questions related to disputed issues of fact with DCF analysis	1.50												1.5		
8/30/2025	Reading SDGE witness Nowak testimony for DCF growth rate analysis issues	1.50												1.5		
8/30/2025	Reading UCAN witness Bandyk testimony for DCF growth rate analysis issues	1.00												1		
8/30/2025	Writing cross-examination questions related to disputed issues of fact with DCF growth rate analysis	0.50												0.5		
9/1/2025	Reading SDGE witness Nowak testimony for overall GDP economic growth rate vs. utility growth rate	1.00												1		
9/1/2025	Reading UCAN witness Bandyk testimony for GDP economic growth rate vs. utility growth rate	1.00	</													

		64.00	3.00	2.50	8.50	0.00	0.00	0.00	0.00	35.25	14.75
UCAN Staff Cumulative Hours											
Total Hours by Issue											
		Total Hours	PP	IP	II	1	2	3	4	5	6
		316.75	24.75	35.50	54.25	14.75	10.75	23.50	38.00	73.25	42.00
		100%	8%	11%	17%	5%	3%	7%	12%	23%	13%

Attachment A
Synapse Energy Consultant Agreement



May 26, 2025
Edward Lopez and Jane Krikorian
Utility Consumers' Action Network
404 Euclid Ave., Ste. 377
San Diego, CA 92114

RE: Cost of Capital Testimony

Dear Edward and Jane,

Based on our recent communications regarding the cost of capital application from San Diego Gas & Electric Company (SDG&E), I am providing this engagement letter describing the scope and budget of the proposed work. We are excited to work with Utility Consumers' Action Network (UCAN) on this project.

SCOPE OF WORK

Synapse Energy Economics, Inc. (Synapse) proposes to perform the services described below. Synapse plans to help UCAN investigate and analyze the claims made by SDG&E in its *Test Year 2026 Cost of Capital Application of San Diego Gas & Electric Company*.

Synapse will provide the following services to assist UCAN in effectively intervening in this proceeding.

- Analyze SDG&E's application and testimony.
- Draft discovery to SDG&E, as appropriate.
- As directed by UCAN, prepare opening testimony.
- If needed and directed by UCAN, prepare rebuttal testimony.
- Respond to discovery from other parties.
- At UCAN's direction, participate in any meet-and-confers and/or settlement discussions.
- Appear for cross examination and assist UCAN counsel at hearings.
- Assist UCAN counsel with briefs and reply briefs, and comments and reply comments on the proposed decision.

While a schedule has yet to be adopted, UCAN proposed the following schedule in its protest:

Activity	SDG&E Proposed Date	UCAN Proposed Date
Application Filed	March 20, 2025	
Intervenor Testimony	June 5, 2025	July 30, 2025
Rebuttal Testimony	June 30, 2025	August 20, 2025
Meet and Confer -Stipulated Facts		Aug. 25–Aug. 29
Evidentiary Hearings	July 14, 2025	Sept. 3–5, 2025
Opening Briefs	July 31, 2025	September 26, 2025
Reply Briefs	August 15, 2025	October 10, 2025
Proposed Decision	November 2025	November 21, 2025
Final Decision	December 2025	December 22, 2025

The final schedule may be different; however, this gives a general idea of events and deadlines for which Synapse and UCAN can begin to prepare.

DELIVERABLES AND ANALYSIS

Final deliverables for this project include opening testimony of roughly 30 pages, plus exhibits, and rebuttal testimony of roughly 20 pages, plus exhibits, to be completed by the dates ultimately approved in the case schedule. By signing this agreement, UCAN acknowledges that meeting the deliverable target dates is contingent upon timely completion of review and comments of the testimonies by UCAN. UCAN also agrees to provide any comments and/or suggested edits to the draft deliverables in a single, red-lined electronic copy of the deliverable. We request that UCAN immediately advise Synapse as soon as it becomes aware of any developments that may delay completion of work according to the agreed upon schedule and budget.

Synapse provides independent, objective analysis and expert services. While Synapse appreciates and will make every effort to accommodate client input into the deliverables, the final content and wording of the deliverables will be determined by Synapse. UCAN will conduct a final review of any document prior to filing it with the California Public Utilities Commission.

ACCEPTANCE OF WORK PRODUCT

Synapse will provide opening testimony to UCAN for review 10 business days prior to the filing deadline. For example, if opening testimony is due July 30, 2025 Synapse will send a completed draft to UCAN no later than close of business July 16, 2025. Synapse will provide rebuttal testimony no later than 5 business days prior to the filing deadlines. Synapse and UCAN may agree to different dates if both parties agree that circumstances warrant a change. If a deliverable does not meet UCAN’s needs, UCAN agrees to notify the project manager within five days after the completion or delivery of the applicable work product. If no notice of deficiency is provided within such five days, the applicable work product will be deemed to have been accepted by UCAN.



INTELLECTUAL PROPERTY NOTE: During the course of providing these services, Synapse may use certain pre-existing and proprietary tools, data sets, models, formulas, spreadsheets, methodologies, processes, formats, and templates, (Prior IP). This Prior IP has been developed by Synapse and/or its subcontractors (“Synapse Parties”) overtime, is not publicly available, and is of significant value to the Synapse Parties. Therefore, the Synapse Parties reserve all their rights in and ownership of such Prior IP, but provide UCAN with a license to use the Prior IP incorporated into any work product or deliverable as part of such work product or deliverable. Further, in order to provide the services, the Synapse Parties may be required to use third-party data sets and models (some publicly available and some proprietary) (“Third Party IP”). The Synapse Parties do not own this Third-Party IP and cannot assign any ownership rights to UCAN.

SERVICES NOT INCLUDED IN SCOPE

Numerous additional issues may arise during this project. We are happy to discuss expansion in the scope of work described here, with corresponding changes in the budget.

BUDGET

Synapse will provide UCAN with the services described above for an estimated total budget of \$44,424, not including travel. This is based on a time-and-materials basis for effort expended and expenses incurred. The following table provides additional detail regarding the expected time commitment.

	Expected Hours	Expected Costs
Task 1: Opening Testimony	90	\$28,280
Task 2: Rebuttal Testimony	16	\$4,984
Task 3: Briefs	20	\$6,176
Task 4: Participate in Hearings and conferences	16	\$4,984
Total Costs*		\$44,424

** Total Costs do not include travel expenses.*

In addition, Synapse also anticipates estimated reimbursable expenses for project-related travel of \$1,200 to \$1,550 for Matthew Bandyk to travel to San Francisco for any evidentiary hearings before the California Public Utilities Commission. Travel expenses assume a maximum of two days in San Francisco and two nights in a hotel. We provide a breakdown of our travel-related cost estimate in the table below. Travel can include airfare, ground transport, car rental, accommodations, meals, and other incidentals. This is just an estimate. Prior to travel, we will provide an updated, itemized travel budget for your pre-approval. Billable hours related to air travel are paid at 50% of traveler’s hourly rate.



Expense	Description	Estimated Amount
Airfare*	Roundtrip Flight DTW-SFO	\$500-\$600
Hotel	2 nights	\$350-\$500
Taxi	To and from airports and hotel/home	\$250-\$350
Meals		\$100
Total		\$1,200-\$1,550

**If travel dates are not fixed, Synapse reserves the right to buy refundable tickets.*

This is a good-faith estimate based upon our current understanding of the requirements to complete the project. However, there are several factors that could impact our understanding of the scope and the budget. If for any reason we identify factors that change the level of effort required and/or will exceed the estimated budget, Synapse will inform UCAN as soon as reasonably possible, so that we can discuss an appropriate modification to the scope and/or budget.

PROJECT TEAM AND RATES

Matthew Bandyk will serve as Project Manager and primary contact on behalf of Synapse. He can be reached at 617-453-7032 or at mbandyk@synapse-energy.com. Matthew Bandyk will oversee the quality and timeliness of work performed by all team members and will provide UCAN with project status updates on a weekly basis.

The Synapse project team for this work will include Caroline Resor, Senior Associate, Aidan Glaser Schoff, Senior Associate, and Melissa Whited, Senior Vice President. Synapse uses a team approach and may use additional or alternative staff to complete the work. Synapse will ask for UCAN’s approval and provide UCAN with the resumes of all new staff before adding new staff to the project

Below, we include a list of proposed 2025 hourly rates. If the project work extends into 2026 or beyond, Synapse will increase all hourly rates by the allowable cost of living adjustment annually, as described in the invoicing section below.

Name, Title	CA PUC Labor Category	CA PUC Labor Level	2025 Hourly Rate
Matthew Bandyk, Principal Associate	Economist	IV	\$325
Caroline Resor, Senior Associate	Public Policy Analyst	II	\$270
Aidan Glaser Schoff, Senior Associate	Public Policy Analyst	II	\$215
Melissa Whited, Senior Vice President	Public Policy Analyst	IV	\$390

INVOICING

UCAN shall pay Synapse for services as set forth in this agreement and will include both labor and reimbursement of expenses. All invoices will be sent electronically to the UCAN Project Leader and the billing contact identified below. Confirmation is required upon receipt of each invoice. Invoices will contain a description of services, including the date, the person rendering the service, the amount of



time involved, and a description of the task or activity. If applicable, any reimbursable expenses incurred will be included in the invoice.

For the initial calendar year of the contract, rates are shown in the table above for all staff who record time to the project. These rates will be adjusted annually on January 1 by the escalation methodology adopted by the Commission in Resolution ALJ-393, which is based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index.¹ Synapse and UCAN agree that the total project budget will be adjusted to reflect the application of escalated rates pursuant to the Resolution ALJ-393 methodology.

Synapse will submit detailed invoices for Synapse's services on behalf of UCAN and detailed accounting of all expenses on a monthly basis. Fifty percent of the total invoiced amount up to a maximum of \$2,500 shall be due to Synapse within thirty (30) days after UCAN receives each invoice from Synapse. Invoice amounts greater than \$2,500 will be rolled over into subsequent months until paid. The remaining 50 percent will be deferred pending the receipt of UCAN's intervenor compensation from the Commission. All deferred amounts will become due and payable upon UCAN's receipt of intervenor compensation as provided below.

Following the issuance of a final decision in the proceeding, UCAN will file an intervenor compensation request for all hours worked by Consultant on the proceeding that are compensable under the CPUC's intervenor compensation rules. When the CPUC does issue a decision regarding intervenor compensation, Synapse and UCAN will reconcile payments consistent with the CPUC's intervenor compensation decision. Synapse and UCAN understand that the Commission may not approve the requested hourly rates for Synapse staff or may not fully reimburse UCAN for all hours of work performed by Synapse.

In that event, UCAN will reimburse Synapse for all of the deferred invoiced amounts net of all (100 percent) amounts disallowed by the Commission for hourly rates. UCAN will pay Consultant the amount that the CPUC awards minus UCAN's prior payments to Consultant under this agreement. UCAN shall not owe Consultant, nor shall pay Consultant, any amounts, hours, or rates billed on invoices that are not awarded in the Intervenor Compensation decision.

Consultant understands and acknowledges that final payment from UCAN, should Intervenor Compensation be awarded, will pay based on:

- i. The deferred amount of Consultant's invoiced billings shall be paid from, and out of, any Intervenor Compensation decision awarded to UCAN.

¹ Pursuant to Resolution ALJ-393, annual escalation will be based on the annual percentage change in the Bureau of Labor Statistics Employment Cost Index (ECI), Table 5, for the Occupational Group "Management, Professional, and Related excluding Incentive Paid Occupations." See Resolution ALJ-393, p. 4 and Ordering Paragraphs 1, 2; Final Report: Intervenor Compensation Market Rate Study, prepared by Level 4 Ventures, Inc., p. 6.

- ii. The hours and rate(s) as approved/awarded by the Commission in its Intervenor Compensation shall supersede any hours and rates billed in Consultant's invoices.
- iii. Any and all amounts previously paid to Consultant by UCAN shall be deducted from the outstanding amount due to Consultant from the Intervenor Compensation decision.

UCAN will pay within 30 days of receiving final intervenor compensation any remaining amounts owed to Synapse for all hours compensated by the CPUC at the rate determined and hours allowed by the CPUC, as illustrated below. For example, assume that UCAN requests an hourly rate of \$300 for a Synapse consultant and 100 hours of time billed at that rate, for a total claim of \$30,000. Assume UCAN paid Synapse \$15,000 during the course of the case and the remaining deferred amount is \$15,000.

Scenario A: If the Commission authorizes a rate of \$250 for that consultant and 100 hours of work, for a total award of \$25,000. UCAN will reimburse Synapse as follows:

Amount paid to Synapse during course of case at maximum of \$2,500/month: \$15,000

Deferred amount = \$15,000

Disallowance for hourly rate = \$50/hour * 100 hours = \$5,000

Disallowance of hours worked = none

Final UCAN ICOMP-based payment to Synapse = \$10,000 (ICOMP award amount \$25,000 – Amount paid \$15,000) = \$10,000

Total UCAN payment to Synapse: \$15,000 + \$10,000 = \$25,000 = ICOMP award

Note: Synapse absorbs 100% of the disallowance in this scenario.

Scenario B: If the Commission authorizes a rate of \$300 for that consultant and 90 hours of work, for a total award of \$27,000. UCAN will reimburse Synapse as follows:

Amount paid to Synapse during course of case at maximum of \$2,500/month: \$15,000

Deferred amount = \$15,000

Disallowance for hourly rate = none

Disallowance of hours worked = 10 hours * \$300/hour = \$3,000

Final UCAN ICOMP-based payment to Synapse = \$12,000 (ICOMP award amount \$27,000 – Amount Paid \$15,000) = \$12,000.

Total UCAN payment to Synapse: \$15,000 + \$12,000 = \$27,000



Scenario C: If the Commission authorizes a rate of \$250 for that consultant and 90 hours of work, for a total award of \$22,500, Synapse will absorb 100% of the rate disallowance and 100% of the hours disallowance. UCAN will reimburse Synapse as follows:

Amount paid to Synapse during course of case at maximum of \$2,500/month: \$15,000

Deferred amount = \$15,000

Disallowance for hourly rate = \$50/hour * 90 hours = \$4,500

Disallowance of hours worked = 10 hours * \$300/hour = \$3,000

Final UCAN ICOMP-based payment to Synapse = \$7,500 (ICOMP award amount \$22,500 – Amount Paid \$15,000) = \$7,500

Total UCAN payment to Synapse: \$15,000 + \$7,500 = \$22,500

Irrespective of the above, UCAN will reimburse reasonable, prior-approved travel expenditures as reimbursed by the Commission. Food costs not reimbursed by the Commission will be reimbursed by UCAN up to \$100 a day. All travel receipts need to be included with the intervenor compensation claim.

TRAVEL COMPENSATION

Per CPUC guidelines, any air travel hours are reimbursed at 50% of traveler's hourly rate. Other rules can be found at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/icomp-materials/updated-icomp-program-guide-april-2017.pdf>

CONTRACT AGREEMENT AND COMMENCEMENT OF WORK

Work can begin upon execution of this letter of engagement. The agreement will be considered executed when both parties have signed the agreement. Electronic signature of the document is valid. Work will end once the Commission adopts a final decision, or upon mutual agreement of both UCAN and Synapse.

TERMS AND CONDITIONS

This Proposal—together with the attached Synapse Energy Economics, Inc. Terms and Conditions and any included exhibits, schedules, and annexes—constitutes the entire agreement of the parties hereto with respect to the subject matter hereof, and supersedes all prior and contemporaneous agreements and understandings, whether written or oral, with respect to such subject matter.

We look forward to the opportunity of assisting UCAN in this matter.



On behalf of Synapse Energy Economics:

<i>Asa S. Hopkins</i>	Jun 3, 2025
box SIGN _____ 4KK9K634-1VI6355P	Date
Asa Hopkins	
Senior Vice President, Consulting	

On behalf of UCAN:

<i>Edward Lopez</i>	Jun 3, 2025	edward@ucan.org
box SIGN _____ 13V65LP8-1VI6355P	Date	Email
Edward Lopez		
Executive Director		

Courtney Cook-Sloan	404 Euclid Ave., Ste. 377 San Diego CA 92114
Billing Contact Name	Billing Address

619-696-6966	courtney@ucan.org
Billing Contact Phone Number	Email Address

Jane Krikorian	jane@ucan.org
Project Leader	Email Address



SYNAPSE ENERGY ECONOMICS, INC.

TERMS AND CONDITIONS

1. Change Orders. Any revisions with respect to the services or deliverables, whether due to failure of an assumption or dependency as stated in the Proposal or otherwise, will be set forth in a written order executed by both Parties (“Change Order”). If a Change Order recites revisions that materially increase the scope of the services or the effort required to deliver deliverables under the Proposal, then the Parties will include in the Change Order the revised services, deliverables, delivery schedule, and payment schedule, as agreed by the Parties through good-faith negotiations, and such will apply to the implementation of the revisions.

2. Project Management. For each project, the Client will designate a single point of contact within its organization to manage the project described in the Proposal (“Project Leader”). The Project Leader will communicate and meet with Synapse, as necessary to manage the services to be performed under the Proposal.

3. Termination. Either party may terminate the services provided for in the Proposal at its convenience upon thirty (30) days prior written notice to the other party. If the Proposal is terminated in accordance then the following will apply: (a) the parties will cooperate to effect an orderly, efficient, effective, and expeditious termination of the parties’ respective activities under the terminated Proposal; (b) the Client shall immediately pay for services rendered prior to such termination; and (c) Synapse agrees to provide the Client with (i) all deliverables for which Synapse received payment from the Client and (ii) all property owned by the Client, whether tangible and intangible, in its possession and/or control and (iii) refund any and all payment(s) for Services it received from the Client in advance, for which Services were not performed.

4. Intellectual Property Rights. Subject to these terms and conditions, Synapse hereby grants to Client a non-exclusive, royalty-free, perpetual, world-wide license to Synapse’s intellectual property rights in the materials delivered to the Client under this Agreement or any Proposal (“Deliverables”), specifically the rights to copy, modify, and use the Deliverable’s for the purposes for which the Deliverable’s were produced. Synapse reserves all other rights in any Deliverables developed under the Proposal and these terms and conditions.

5. Confidential Information. The parties acknowledge and agree that information and documents exchanged between them, including project specifications and other information related to the development and performance of Synapse’s services may constitute valuable confidential or proprietary information of either party. For purposes of the Proposal and these terms and conditions, “Confidential Information” shall mean any and all information, writings, drawings, designs, plan, research, data, models, proposals, passwords, log-in information, pricing information, customer lists, lead lists, non-public database contents, employee/contractor information, vendors, and all concepts and ideas, reasonably related to the parties’ businesses which are not public domain, and any information that a reasonable person would understand to be confidential or proprietary given the nature of the information and the circumstances of the disclosure. The parties shall keep all Confidential Information confidential and shall not at any time either directly or indirectly use, divulge, disclose or communicate to any person, firm, or corporation, in any manner whatsoever, all or any portion of the Confidential Information. The parties understand however, that the receiving party shall not be prevented from using or disclosing information which: (i) is known to the receiving party prior to obtaining the same information from the



disclosing party; (ii) is, at the time of disclosure by the disclosing party, already in the public domain, (iii) is required by law or any court proceeding; (iv) is obtained by the receiving party from a third party who did not receive the same information from the disclosing party, directly or indirectly; or (v) is independently developed by the receiving party without use of or reference to the Confidential Information of the disclosing party.

6. Client Materials. Any materials provided exclusively by the Client to Synapse (“the Client’s Materials”) will be used and disclosed solely as required to perform the services. The Client will own the Client’s Materials, as well as any derivatives or improvements of the Client’s Materials developed or derived by Synapse through use of the Client’s Materials. Client represents and unconditionally guarantees that Client’s Materials furnished to Synapse for inclusion in any Deliverables are owned by Client or that Client has permission from the rightful owner to such materials and that any use of Client’s Materials by Synapse shall not result in the violation of any intellectual property rights, contractual rights, or any other rights of any third party. Client further agrees that it will defend, indemnify, and hold harmless Synapse and its respective staff and affiliates from and against any and all liabilities, claims, demands, damages, or costs, including, without limitation, settlement sums, attorney fees, expert fees, alleged or incurred in connection with from any claim or suit arising from the use of such Client Materials furnished by Client.

7. Solicitation Restriction. In consideration of the benefits to be received by the Client in connection with the Proposal and these terms and conditions, the adequacy of which is acknowledged by the Client, the Client solely with respect to itself/herself/himself, agrees that during the term of the Proposal, and for a period of one (1) year immediately following the termination or expiration of the Proposal, the Client shall not solicit or induce, either directly or indirectly for its own benefit or the benefit of a third party, any employee or independent contractor of Synapse, to alter, terminate or breach an employment, contractual or other business relationship with Synapse or otherwise hire or engage, or offer to hire or engage, any such employee or independent contractor, unless through Synapse.

8. Portfolio. The Client provides Synapse with a license to use the Client’s name and images of Deliverables for Synapse’s promotional purposes (e.g., in Synapse’s portfolio, on the Synapse website(s) or otherwise).

9. Disclaimer. Synapse’s services, including any reports, analysis, or opinions are provided in response to specific questions and issues raised by Client and are for educational and informational purposes only. Client understands and acknowledges that Synapse does not engage in lobbying activities or provide lobbying services and that the services described herein are not intended to be lobbying activities. Client represents and warrants that Client shall not direct Synapse to act in any manner that may be considered “lobbying” or require any registration by Synapse or its employees as “lobbyists” under any federal, state, or other applicable law. The information Synapse uses to complete the services described herein is provided by Client, industry databases, third party resources, or publicly available information at the time of the services and Synapse makes no representations, warranties, or guarantees as to the accuracy, reliability, currency, or completeness of such information. Synapse makes commercially reasonable efforts to ensure that the services and any reports, analysis, or opinions provided by Synapse are complete, and up-to-date at the time they are provided to Client; however, Synapse cannot account for future changes in scientific knowledge, industry standards of practice, or regulatory requirements. The opinions and analysis of Synapse may differ or be contrary to the opinions or analysis of other consultants, business areas or groups as a result of using different assumptions and criteria. Synapse cannot guarantee a particular outcome or result.

Neither party hereunder will be liable for any special, incidental, consequential, indirect, punitive or exemplary damages of any kind whatsoever, including, without limitation, damages resulting from interruption of business or loss of anticipated profits, revenues, data or benefits, even if such party has been advised of the possibility of such damages and regardless of the form (e.g. contract, tort, warranty or otherwise) of any legal or equitable action brought against the party. In no event will Synapse's liability arising out of or relating to Proposal or these terms and conditions or any default hereunder, regardless of the form of the action, exceed fees actually paid to Synapse by Client under the Proposal.

10. Payment Defaults. Client agrees to pay interest on all past-due sums at the lower of one-and-one-half percent (1.5%) per month or the highest rate allowed by law, after giving Client notification of any past due amounts and a 5-day grace period to correct any past-due sums. Client will pay for, and will indemnify and hold Synapse harmless from, any applicable sales, use, transaction, excise or similar taxes and any federal, state or local fees or charges, imposed on, in respect of or otherwise associated with any Services. In the event of a payment default by Client, Client shall be responsible for payment of all of Synapse's costs of collection, including, but not limited to, court costs, filing fees and attorneys' fees. In addition, if payments are not received as described above, Synapse reserves the right to withhold Deliverables, including any reports, documents, or content, and/or suspend Services until such payment is received and the Client agrees to hold Synapse harmless for such.

11. Governing Law and Dispute Resolution. The Proposal and these terms and conditions shall be governed by, and construed in accordance with, the laws of the California., excluding those laws that direct the application of the laws of another jurisdiction. The Parties hereby consent to the jurisdiction and venue of any State or Federal court located in California. The Client shall not knowingly take or fail to take any action, or direct Synapse to take or fail to take any action, that might cause Synapse to be in violation of any applicable law or regulation.



Attachment B
PCMG Consultant Agreement



May 25, 2025

VIA EMAIL

Mr. Karl Richard Pavlovic
Managing Director
PCMG and Associates, LLC
22 Brookes Ave.
Gaithersburg, MD 20877

**Re: Engagement for Expert Services in CPUC Proceeding A.25-03-013
SDG&E 2025 Cost of Capital**

Dear Karl:

This letter memorializes the agreement and terms of service between PCMG & Associates (“Consultant”) and Utility Consumers’ Action Network (“UCAN”) to provide expert services to UCAN in the 2025 SDG&E “Cost of Capital” proceeding, docket number A.25-03-013, presently before the California Public Utility Commission (the “Commission”).

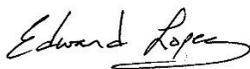
1. In this Docket Consultant agrees to review the documents filed by both the Commission and the other parties, attend workshops and Commission hearings, research issues and help UCAN’s counsel develop and present UCAN’s positions. UCAN may ask Consultant to prepare written testimony, comments and subsequent replies pursuant to the scope of work (to be developed). The scope of work shall also reflect and incorporate the proposed Scope of Work as identified in the Consultant’s proposal.
2. Consultant agrees to help coordinate efforts between UCAN and other parties to this proceeding. Consultant will work with UCAN to review Comments submitted by other Parties and respond if it is agreed that a response is appropriate.
3. Should evidentiary hearings be scheduled, UCAN may also request Consultant be available and appear for cross-examination. Travel, and associated out-of-pocket costs, incurred as a result of Consultant’s work in these proceedings will be reimbursed should Consultant be required to appear at the Commission on behalf of UCAN per Intervenor Compensation program rules.

Consultant agrees to provide UCAN with all related receipts so that we may seek compensation for those costs. Both parties agree that any travel requirements will be mutually agreed upon and other options may be considered.

4. Consultant acknowledges that it has substantial subject matter expertise regarding Cost of Capital which are the subject of this proceeding. Consultant also represents it has no conflicts-of-interest that preclude Consultant from serving as UCAN's expert consultant in this immediate proceeding, and that Consultant shall notify UCAN if you engage as a consultant to another party in this matter.
5. Attachment A to this agreement identifies the Consultant's team members and rates. UCAN will pay Consultant 25% of your rate for all the hours invoiced in the proceeding. The remaining portion of the hourly billing is deferred pending an award received by UCAN from, and through, the Commission's Intervenor Compensation Program.
6. Consultant and UCAN understand that the Commission may not award UCAN any amount, nor fully reimburse UCAN, for work performed by Consultant. UCAN shall not owe Consultant, nor shall pay Consultant, any amounts billed on invoices that are not awarded in the Intervenor Compensation decision. Consultant understands and acknowledges that final payment from UCAN, should Intervenor Compensation be awarded, will pay based on:
 - i. The deferred amount of Consultant's invoiced billings shall be paid from, and out of, any Intervenor Compensation decision awarded to UCAN.
 - ii. The hours and rate(s) as approved/awarded by the Commission in its Intervenor Compensation shall supersede any hours and rates billed in Consultant's invoices;
 - iii. Any and all amounts previously paid to Consultant by UCAN shall be deducted from the outstanding amount due to Consultant from the Intervenor Compensation decision;
7. Both parties have not adopted an estimate or cap on hours to be performed by Consultant in this proceeding. Consultant agrees, however, to inform UCAN in writing by email when it has billed approximately \$15,000 in this matter; at this point Consultant and UCAN will discuss a mutually agreeable limitation, if any, for future hours.
8. Consultant will submit invoices for payment every 30 days showing dates of performance for specific tasks, description of each task performed, and itemization of expenses (i.e. travel) incurred during such period. Please send invoices to Edward Lopez at edward@ucan.org and Courtney Cook at courtney@ucan.org.

Please sign and return the original to UCAN.

Sincerely,



Edward Lopez
Executive Director

On behalf of Consultant, I agree to the terms memorialized in this letter agreement regarding engagement in CPUC proceeding A.25-03-013.

Karl R. Pavlovic

Karl Richard Pavlovic
PCMG and Associates, LLC

Attachment C

Jane Krikorian Resume

JANE KRIKORIAN

Attorney/Regulatory
Program Manager
jane@ucan.org

Legal professional with experience developing positions on energy and ratemaking policy before the California Public Utilities Commission (CPUC). Advance positions on reasonable, reliable and affordable rates before the CPUC.

Skills & Expertise

- Drafting and filing legal pleadings
- Coordinating experts
- Managing CPUC participation
- Conducting legal and policy research
- Developing strategies
- Advancing policy positions

Professional Experience

Utility Consumers Action Network (UCAN)
Regulatory Program Manager

2014-present

- Legal advocacy on behalf of utility ratepayers before the California Public Utilities Commission (CPUC).
- Coordinate legal staff with CPUC proceedings and strategic direction for UCAN
- Provide representation on all aspects of regulatory litigation for assigned proceedings.
- Coordinate strategy with experts and other intervenors on CPUC proceedings.
- File protests, submit testimony, attend hearings and workshops, write briefs and submit comments on ratepayer protection issues to ensure reasonable, reliable and affordable rates.
- Managed finances and assisted in preparing yearly budgets of approximately \$600,000.

Legal Aid Society of San Diego – Social Security
Law Clerk

2013

- Review and compile medical records to develop and submit claim to Social Security Administration.
- Research and analyze pertinent laws, codes, and statutes of government agencies administering public benefits.

Legal Aid Society of San Diego – Low-Income Tax Clinic
Law Clerk

2011-2012

- Research and analyze statutes and case law to ascertain correct course of action.
- Draft complex tax documents to help resolve issues for clients before IRS.

California Western School of Law, San Diego, CA
Legal Research Assistant

2008-2010

- Conduct legal research for constitutional law professor for published books and papers.

Education

Juris Doctorate, California Western School of Law, San Diego
Bachelor's Degree, Communications, University of California, San Diego

Attachment D
Matthew Bandyk

Matthew Bandyk, Principal Associate

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139 | 617-453-7032
mbandyk@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Inc., Cambridge, MA. *Principal Associate*, January 2025 – Present.

- Performs financial analysis for clients in regulatory cases involving utility cost of capital.
- Summarizes complex technical concepts to clients, regulators, and public audiences through papers, presentations, testimony, and meetings.
- Creates, uses, and maintains spreadsheet-based tools and other analytical platforms to analyze energy technologies, programs, and portfolios.

5 Lakes Energy, Northport, MI. *Consultant*, September 2021 – December 2024

- Provided public policy recommendations and financial analysis for nonprofit energy advocacy and government clients.
- Served as expert witness in testimony in Michigan Public Service Commission rate cases; testimony contributed to hundreds of millions of dollars in ratepayer savings from the outcome of cases.
- Frequently used Microsoft Excel for testimony and projects, such as designing financial models for the City of Ann Arbor.
- Coordinated the writing and research for major reports for clients, such as the Citizens Utility Board of Michigan's Utility Performance Report and Evergreen Collaborative's Michigan Clean Energy Framework.
- Served as communications strategist for the Michigan Energy Innovation Business Council, including writing social media, blog posts on utility regulation and policy issues, enterprise articles in publications like Utility Dive, and op-eds in newspapers like the Detroit Free Press and the Detroit News.
- Significantly expanded contract work for 5 Lakes Energy by bringing in clients from my independent consultancy.

Bandyk Consulting LLC, Royal Oak, MI. *Clean Energy Consultant*, January 2019 – September 2021

- Performed communications and regulatory engagement strategy, including writing comments in regulatory cases, for clients such as the Citizens Utility Board of Michigan and the Michigan Energy Innovation Business Council.

Atwell LLC, Southfield, MI. *Financial Services Manager*, May 2018 – January 2019.

- Purchased long-lived assets to support Atwell's work in environmental and engineering project consulting.
- Performed financial analysis to overhaul company's asset leasing policies with goal of saving up to ~\$100k per year by improving asset life.

Environmental Defense Fund, Toledo, OH. *Climate Corps Fellow*, Summer 2017

- Built financial valuation tool for payback, NPV and IRR of solar arrays planned by client, determining best ROI for about \$300,000 in solar investments.
- Designed energy use tracking system for the largest private low-income housing provider in Toledo, Ohio; system saved hundreds of work hours annually.

DTE Energy, Detroit, MI. *MBA Student Consultant*, March 2017 – April 2017

- Performed market and regulatory compliance research on original proposal for DTE to enter the corporate renewable energy space; presented to company leadership.
- Designed tariff to add wind/solar and cut rates by 20% compared to DTE's green tariff.

S&P Global Market Intelligence/SNL Financial, Arlington, VA. *Reporter*, June 2010 – August 2016

- Used Excel analysis of power plant output and commodity price databases to create actionable intelligence about new trends in the energy industry for clients.
- Wrote articles on utilities, power plants, energy efficiency and regulation for subscription website read daily by thousands of energy and investment professionals.

EDUCATION

University of Michigan Stephen M. Ross School of Business, Ann Arbor, MI
Master of Business Administration, 2018

Davidson College, Davidson, NC
Bachelor of Arts in Political Science, 2006; *cum laude*

Society for Utility and Regulatory Financial Analysts
Certified Rate of Return Analyst, 2025

PUBLICATIONS

Borden, E., C. Resor, M. Bandyk, A. Zeng, A. Glaser Schoff, T. Gyalmo, P. Knight, S. Shenstone-Harris. 2025. *Policy Interventions to Address Rising Electricity Costs in New Jersey*. Synapse Energy Economics for the Natural Resources Defense Council and Evergreen Collaborative.

TESTIMONY

Michigan Public Service Commission (Docket U-21870): Direct Testimony of Matthew J. Bandyk regarding the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief. September 30, 2025.

Michigan Public Service Commission (Docket U-21860): Direct Testimony of Matthew J. Bandyk regarding the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy. August 22, 2025.

California Public Utilities Commission (Docket A.25-03-013): Direct Testimony of Matthew J. Bandyk regarding San Diego Gas and Electric Company 2026 Cost of Capital. On behalf of Utility Consumers' Action Network. July 30, 2025.

Michigan Public Service Commission (Docket U-21806): Direct Testimony of Matthew J. Bandyk regarding the application of Consumers Energy Company for authority to increase its rates for the distribution of natural gas and for other relief. On behalf of Citizens Utility Board of Michigan. April 23, 2025.

Michigan Public Service Commission (Docket U-21585): Direct Testimony of Matthew J. Bandyk regarding Consumers Energy Company's application for authority to increase its rates for the generation and distribution of electricity and for other relief. On behalf of Citizens Utility Board of Michigan, Natural Resources Defense Council and Michigan Environmental Council. September 27, 2024.

Michigan Public Service Commission (Docket U-21534): Direct Testimony of Matthew J. Bandyk regarding DTE Electric Company's application to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority. On behalf of Citizens Utility Board of Michigan and Michigan Environmental Council. July 25, 2024.

Michigan Public Service Commission (Docket U-21555): Direct Testimony of Matthew J. Bandyk regarding Upper Peninsula Power Company's application for authority to increase its rates for the generation and distribution of electricity and for other relief. On behalf of Citizens Utility Board of Michigan. July 19, 2024.

Michigan Public Service Commission (Docket U-21540): Direct Testimony of Matthew J. Bandyk regarding Michigan Gas Utilities Corporation's application for authority to increase retail natural gas rates and for other relief. On behalf of Citizens Utility Board of Michigan. June 28, 2024.

Michigan Public Service Commission (Docket U-21291): Direct Testimony of Matthew J. Bandyk regarding DTE Gas Company's application for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of natural gas, and for miscellaneous accounting authority. On behalf of Citizens Utility Board of Michigan. May 7, 2024.

Michigan Public Service Commission (Docket U-21490): Direct Testimony of Matthew J. Bandyk regarding Consumers Energy Company's application for authority to increase its rates for the distribution of natural gas and for other relief. On behalf of Citizens Utility Board of Michigan. April 22, 2024.

Michigan Public Service Commission (Docket U-21389): Direct Testimony of Matthew J. Bandyk, Natural Resources Defense Council, Sierra Club, and Citizens Utility Board of Michigan regarding Consumers

Energy Company's application for authority to increase its rates for the generation and distribution of electricity and for other relief. On behalf of Michigan Environmental Council. August 29, 2023.

Michigan Public Service Commission (Docket U-21048): Direct Testimony of Matthew J. Bandyk regarding Consumers Energy Company's application for approval to implement a power supply cost recovery plan for the 12 months ending December 31, 2022. On behalf of Citizens Utility Board of Michigan. April 29, 2022.

Resume updated June 2025

Attachment E
Aidan Glaser Schoff

Aidan Glaser Schoff, Senior Associate

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139
aglaserschoff@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Associate*, April 2025 – Present; *Associate*, June 2023 – April 2025.

- Analyzes electric utility grid planning and modernization proposals with particular attention to distributed energy resources, grid modernization, and energy policy goals.
- Assesses economic incentives of various types of utility ratemaking models, including traditional cost of service studies, cost trackers, multi-year rate plans, and performance incentive mechanisms.
- Supports colleagues in the preparation of expert testimony, comments, and models related to load forecasting, grid modernization, utility regulation, and net energy metering.

Christensen Associates, Madison, WI. *Staff Economist*, November 2021 – May 2023.

- Conducted surveys of American and Canadian utility tariffs covering residential, industrial, and electric vehicle rates.
- Conducted background regulatory research and helped craft memos covering performance-based regulation (PBR) in North America.
- Prepared workbooks for calculating an X-factor from peer groups of utilities.
- Evaluated the load impact of voluntary residential time-of-use and critical peak pricing programs for San Diego Gas & Electric for program years 2021 and 2022.
 - Wrangled hourly load and characteristic data of 45,000 customers over two years.
 - Updated interactive protocol tables which provided evaluations of subsets of customers.

Guidehouse Consulting – Energy, Sustainability & Infrastructure Analytics, Madison, WI. *Advanced Solutions Intern*, February 2021 – June 2021.

- Evaluated the effectiveness of participant & non-participant propensity score matching in the analysis of the load impact of a smart thermostat program.

University of Tennessee Knoxville – Joint Institute for Computational Sciences, Knoxville, TN. *Undergraduate Researcher*, June 2019 – August 2019.

- Constructed force-field simulations of epoxy resin systems using a parallel simulation system.

University of Arkansas Fayetteville – Physics Department, Fayetteville, AR. *Undergraduate Researcher*, May 2018 – August 2018.

- Created MATLAB simulations and visualizations of multi-generation variable-rate cell division.

EDUCATION

University of Wisconsin - Madison, Madison, WI.

M.S. in Agricultural and Applied Economics, Concentration in Resource and Energy Demand Analysis, 2021.

Vassar College, Poughkeepsie, NY.

B.A. in Physics, 2020.

PUBLICATIONS

Borden, E., C. Resor, M. Bandyk, A. Zeng, A. Glaser Schoff, T. Gyalmo, P. Knight, S. Shenstone-Harris. 2025. *Policy Interventions to Address Rising Electricity Costs in New Jersey*. Synapse Energy Economics for the Natural Resources Defense Council and Evergreen Collaborative.

Borden, E., S. Chavin, W. Dejeanlouis, C. Mattioda, A. Zeng, A. Glaser Schoff. 2025. *Assessment of Storage Procurement Mechanisms and Cost-Effectiveness in Maine*. Synapse Energy Economics for the Maine Governor's Energy Office.

Takahashi, K., A. Glaser Schoff, B. Havumaki. 2024. *Evidence Regarding Nova Scotia Power's 2024 Load Forecast*. Synapse Energy Economics for Nova Scotia Utility and Review Board.

Havumaki, B., T. Nguyen, W. Dejeanlouis, A. Glaser Schoff, K. Schultz, E. Boden. 2024. *Community Solar Garden Study, 2024*. Synapse Energy Economics, Great Plains Institute for Sustainable Development, and National Association of State Energy Officials for Minnesota Department of Commerce.

Yuang, C., M. Whited, T. Nguyen, S. Schadler, R. Anderson, W. Dejeanlouis, C. Palmer, C. Mattioda, A. Glaser Schoff, S. Koester, J. Hittinger, P. Eash-Gates. 2024. *Utility Engagement Playbook for Industrial Customers: Addressing Power Sector Barriers to Electrification*. Synapse Energy Economics and World Wildlife Fund for Renewable Thermal Collaborative.

Havumaki, B., Takahashi K., Glaser Schoff, A., *Evidence Regarding Nova Scotia Power's 2024 Load Forecast: Evidence RE: 11689*. Synapse Energy Economics for the Nova Scotia Utility and Review Board.

Woolf, T., Havumaki B., Kallay J., Glaser Schoff, A., Schultz K., Mattioda C., Fuzaylov, A., Alvarez P., Stephens, D., Haugh, J., 2024. *Consultant Comments on the 2024 Massachusetts Electric Sector Modernization Plans: Submitted to the Massachusetts Grid Modernization Advisory Council*. Synapse Energy Economics, The Wired Group, GreenerU for Massachusetts Department of Energy Resources.

Dejeanlouis, W., Gyalmo, T., Glaser Schoff, A., Borden, E., 2024. *Minnesota Hosting Capacity Synthesis Report: Summary of Party Positions and Identification of Knowledge Gaps in Proceedings to Address the Publication of Hosting Capacity Data and Related Maps*. Synapse Energy Economics for the Minnesota Department of Commerce.

Kolesar, M., Hansen D., Vigdor, M., Glaser Schoff, A., 2023. *A Study of Electric Vehicle Fast Charging Rates in North America*. Kolesar Buchanan & Associates Limited and Christensen Associates Energy Consulting for BC Hydro.

Glaser Schoff, A., Crowley, N., Clark, M. T., 2023. *2022 Load Impact Evaluation of Voluntary Residential Critical Peak Pricing (CPP) and Time-of-Use (TOU) Rates for San Diego Gas & Electric*. Christensen Associates Energy Associates for San Diego Gas & Electric.

Crowley, N., Glaser Schoff, A., Clark, M. T., 2022. *2021 Load Impact Evaluation of San Diego Gas and Electric's Voluntary Residential Critical Peak Pricing (CPP) and Time-of-Use (TOU) Rates*. Christensen Associates Energy Associates for San Diego Gas & Electric.

TESTIMONY SUPPORT

Michigan Public Service Commission (Case No. U-21806): Direct Testimony of Alice Napoleon in the matter of the Application of Consumers Energy Company for authority to increase its rates for the distribution of natural gas and for other relief. Synapse Energy Economics for Michigan Environmental Council and Sierra Club. April 23, 2025.

Public Service Commission of South Carolina (Docket No. 2023-388-E): Direct Testimony of Eric Borden in re: Coal Ash Remediation, Targeted Undergrounding, and Self-Optimizing Grid Issues and Cost Recovery for Application of Duke Energy Carolinas, LLC For Increase in Electric Rates. On behalf of the South Carolina Department of Consumer Affairs. April 8, 2024.

Regulatory Commission of Alaska (Docket No. U-23-047): Joint Prefiled Responsive Testimony of Eric Borden and Paul Chernick in re: Rate Design for Tariff Revisions Designated as TA544-8 Filed by Chugach Electric Association, Inc.. On behalf of Renewable Energy Alaska Project. March 14, 2024.

Nova Scotia Utility and Review Board (Docket No. M11441): Evidence of Melissa Whited in re: Application by Town of Antigonish Electric Utility for Approval of Amendments to its Schedule of Rates and Charges for the provision of electric supply and services to its customers and its Schedule of Rules and Regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. February 20, 2024.

Public Utility Commission of the State of Colorado (Docket No. 23A-0392EG): Direct Testimony of Dr. Asa S. Hopkins in re: The Application of Public Service Company of Colorado for Approval of Its 2024-2028 Clean Heat Plan. On behalf of Sierra Club and NRDC. January 22, 2024.

Public Service Commission of the District of Columbia (Docket No. FC – 1176): Direct Testimony of Courtney Lane in re: In the matter of the application of the Potomac Electric Power Company for authority to implement a multiyear rate plan for electric distribution service in the District of Columbia. On behalf of the District of Columbia Government. January 12, 2024.

New Hampshire Public Utilities Commission (Docket No. DE 23-039): Direct Testimony of Courtney Lane in re: Liberty Utilities (Granite State Electric) Corp. D/B/A Liberty, Request for Change in Distribution Rates. On behalf of the Office of the Consumer Advocate. December 13, 2023.

New Hampshire Public Utilities Commission (Docket No. DE 22-060): Direct Testimony of Tim Woolf and Eric Borden in re: Considerations of Changes to the Current Net Metering Tariff Structure, Including Compensation of Customer-Generators. On behalf of the Office of the Consumer Advocate. December 6, 2023.

Nova Scotia Utility and Review Board (Docket No. M11267): Evidence of Eric Borden in re: In the Matter of Nova Scotia Incorporated (NS Power) – Time-Varying Pricing (TVP) Pilot Program – Year Two Report. On behalf of Counsel to Nova Scotia Utility and Review Board. September 26, 2023.

New Hampshire Public Utilities Commission (Docket No. DE 23-068): Direct Testimony of Tim Woolf and Danielle Goldberg in re: 2024-2026 Triennial Energy Efficiency Plan. On behalf of the Office of the Consumer Advocate. September 12, 2023.

Public Service Commission of Wisconsin (Docket No. 6680-UR-124): Direct Testimony of Eric Borden in re: Application of Wisconsin Power and Light Company for Authority to Adjust Electric and Natural Gas Rates. On behalf of Clean Wisconsin. September 5, 2023.

PRESENTATIONS

Glaser Schoff, A., “Solar Compensation Evaluation Strategies”, Vignette at the National Association of State Utility Consumer Advocates Mid-Year Meeting, June 11, 2024.

SKILLS

Microsoft Office Suite, Stata, R, Python

Resume updated June 2025

Attachment F

Caroline Resor

Caroline Resor, Senior Associate

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139
cresor@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Associate*, October 2024 – Present.

- Provides research, analysis, and consulting services on behalf of public interest clients on topics including resource planning, energy and climate policy, and electric utility customer programs (low-income discount rates, arrearage management programs, income-qualified weatherization programs, and disconnection protections)

Graham Sustainability Institute, Ann Arbor, MI. *Graduate Researcher*, January-July 2024.

- Wrote report explaining the complex tax policy treatment of utility-scale renewable energy projects in Wisconsin and a guide for how to estimate incremental local property tax revenue and other benefits associated with developing a project
- Analyzed renewable energy local tax benefits across four Midwestern states and presented findings to rural economic development client to inform advocates

RMI, Cambridge, MA. *Summer Associate, Utility Business Models & Regulation*, June-August 2023.

- Consulted for the Hawaii Public Utility Commission's (PUC) Equity Docket team on creating new and improving existing electric affordability programs for low-income customers
- Evaluated programs, including low-income discount rates, arrearage management programs, income-qualified weatherization programs, and disconnection protections across states, and compared programs' accessibility and ease of enrollment, costs, bill impacts, customer utilization rates, and impacts on energy burden, among other metrics
- Based on interviews with consumer advocates, utility employees, and regulatory staff, wrote case studies for regulators recommending specific actions to reduce electric shutoffs

Cypress Creek Renewables, Santa Monica, CA. *Summer Associate, Solar Development Policy & Strategy*, June-August 2022.

- Defined and presented to company executives an original solar development host community engagement strategy, informed by expert interviews, that solar developers used to de-risk a \$160M pipeline of solar projects
- Identified and filled key gap in company's development playbook by operationalizing local political analysis, stakeholder mapping, and vote counting in their approach to local zoning across 20+ states

American Flood Coalition, Washington, D.C. *Strategy Associate*, August 2019 – May 2021.

-
- Managed project of 15 people across a partner and two local governments to calculate costs/benefits of flood mitigation tactics; managed detailed project timetable, conducted coordination calls; presented in a public meeting; shaped local policy
 - Built and managed AFC's first grant program: Designed evaluation criteria, sourced and vetted community-based organization grantees, and managed and mentored three grantee organizations over the course of a year
 - Supported development of a successful grant proposal to create a municipal grant program focused on environmental justice communities: managed origination team, created weekly progress reports, and led transaction negotiations with consultant partner
 - Authored report recommending ways for federal disaster policy to better serve environmental justice communities, adapted by Rep. Joe Morelle (D-NY) as an amendment to the Moving Forward Act, which was passed by the U.S. House

NASA DEVELOP, Goddard Space Flight Center, Greenbelt, MD. Summer *Local Government Consultant*, June-August 2019. *NASA DEVELOP is a selective 10-week program in which emerging leaders harness NASA data to answer local government clients' questions.*

- Built machine learning model to quantify the feasibility of using satellite data to predict floods in Ellicott City, Maryland
- Secured continuation of project by making extensive efforts to repair rocky client relationship

HASI (f.k.a. Hannon Armstrong), Annapolis, MD. *First U.S. public company dedicated solely to decarbonization; >\$12B assets under management in efficiency and renewable energy.*

Wind and Solar Portfolio Senior Analyst, February-May 2019

- Managed an \$800M portfolio of solar and wind investments, constantly tracked investment performance vs. contract terms
- Built strong, positive relationships with existing and potential clients through doing site visits and attending conferences
- Increased solar project revenues by 8% by implementing bird abatement retrofit for Massachusetts C&I projects
- Assisted business development team during transactions on various decarbonization-focused investments, deftly managing typical workload with investment screening tasks
- Created model to quantify estimated future climate change impacts to entire solar portfolio for Task Force on Climate-Related Financial Disclosures (TCFD) reporting

Portfolio Management Analyst, July 2017–January 2019

-
- Enabled more active portfolio operations management by independently building an ArcGIS dashboard to monitor in real time the geographic exposure of all 88,000 solar and wind projects to hurricanes, flash floods, wildfires, and other disasters
 - Implemented a portfolio data analytics software platform, improving portfolio management team efficiency by 30%

EDUCATION

University of Michigan, Ann Arbor, MI

Master of Business Administration and Master of Science in Environmental Policy & Planning, 2024
Top 5% of MBA Class, Erb Institute Scholarship, Forte Foundation Scholarship

Dartmouth College, Hanover, NH

Bachelor of Arts with honors in Environmental Studies, 2017

PUBLICATIONS AND PRESENTATIONS

Borden, E., C. Resor, M. Bandyk, A. Zeng, A. Glaser Schoff, T. Gyalmo, P. Knight, S. Shenstone-Harris. 2025. *Policy Interventions to Address Rising Electricity Costs in New Jersey*. Synapse Energy Economics for the Natural Resources Defense Council and Evergreen Collaborative.

Knight, P., S. Chavin, J. Hittinger, A. Zeng, C. Resor. 2025. *Modernizing Pennsylvania's Clean Energy Policies: An analysis of the proposed PRESS and PACER policies*. Synapse Energy Economics for Pennsylvania Department of Environmental Protection.

Glick, D., T. Gyalmo, D. Karabakal, L. Metz, C. Resor. 2024. *Review of Tennessee Valley Authority's Draft 2025 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

Resor, Caroline, et al. "State of Washington Renewable Energy Policy Analysis Report." Center for Local, State, and Urban Policy, 2023.

Hughes, Sara, Caroline Resor & Heather Newberry. "State policy and local resilience: evaluating state policies for flood resilience in the Great Lakes region of the United States." *Climate Policy*, 2023.

Resor, Caroline and Kate Stein. "Charting a Course: How the Town of Surfside, FL Is Using Science to Craft Adaptation Policy," National Coastal & Estuarine Summit, 2020, Providence, RI.

Bourne, Stephen, and Caroline Resor. "Using Simulation to Forecast Resilience in Surfside, Florida." *American Water Resources Association IMPACT*, vol. 22, no. 2, 2020, pp. 9-10.

Mediate, Emily, et al. "Scaling Up Local Experience to Achieve National Resilience," ResCon, 2020, New Orleans.

Resor, Caroline, et al. "Turning the Tide: Opportunities to Build Social Equity Through Federal Flood Disaster Policy." American Flood Coalition, 2020.

Resor, Caroline, et al. "Dual Disaster Handbook." American Flood Coalition, 2020.

Cox, Michael, et al. "The Dominican Fishery of Manzanillo: A Coastal System in Transition." *Ocean & Coastal Management*, 2018.

Resume updated January 2025

Attachment G
Melissa Whited

Melissa Whited, Vice President, Consulting

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139 | 617-453-7024
mwhited@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Cambridge MA. *Vice President*, April 2023 – Present; *Senior Principal*, May 2022 – April 2023, *Principal Associate*, 2017 – May 2022, *Senior Associate*, 2015 – 2017, *Associate*, 2012 – 2015

Consult and provide analysis of rate design proposals, alternative regulation, and other topics including distributed energy resources and electric vehicles. Develop expert witness testimony in public utility commission proceedings. Author reports on topics at the intersection of utility regulation, customer protection, and environmental impacts.

University of Wisconsin - Madison, Department of Agricultural and Applied Economics, Madison, WI. *Teaching Assistant – Environmental Economics*, 2011 – 2012

Developed teaching materials and led discussions on cost-benefit analysis, carbon taxes and cap-and-trade programs, management of renewable and non-renewable resources, and other topics.

Public Service Commission of Wisconsin, Water Division, Madison, WI. *Program and Policy Analyst - Intern*, Summer 2009

Researched water conservation programs nationwide to develop a proposal for Wisconsin's state conservation program. Developed spreadsheet model to calculate avoided costs of water conservation in terms of energy savings and avoided emissions.

Synapse Energy Economics, Cambridge, MA. *Communications Manager*, 2005 – 2008

Developed technical proposals for state and federal agencies, environmental and public interest groups, and businesses. Edited reports on energy efficiency, integrated resource planning, greenhouse gas regulations, renewable resources, and other topics.

EDUCATION

University of Wisconsin, Madison, WI

Master of Arts in Agricultural and Applied Economics, 2012

Certificate in Energy Analysis and Policy

National Science Foundation Fellow

University of Wisconsin, Madison, WI

Master of Science in Environment and Resources, 2010

Certificate in Humans and the Global Environment

Nelson Distinguished Fellowship

Southwestern University, Georgetown, TX

Bachelor of Arts in International Studies, *Magna cum laude*, 2003.

ADDITIONAL SKILLS

- Econometric Modeling – Linear and nonlinear modeling including time-series, panel data, logit, probit, and discrete choice regression analysis
- Nonmarket Valuation Methods for Environmental Goods – Hedonic valuation, travel cost method, and contingent valuation
- Cost-Benefit Analysis
- Input-Output Modeling for Regional Economic Analysis

FELLOWSHIPS AND AWARDS

- Winner, M. Jarvin Emerson Student Paper Competition, Journal of Regional Analysis and Policy, 2010
- Fellowship, National Science Foundation Integrative Graduate Education and Research Traineeship (IGERT), University of Wisconsin – Madison, 2009
- Nelson Distinguished Fellowship, University of Wisconsin – Madison, 2008

PUBLICATIONS

Havumaki, B., A. Fuzaylov, M. Whited. 2025. *Optimizing Incentives for Effective PIMs: Coordinating PIMs with authorized ROE for Efficient and Effective Regulation*. Synapse Energy Economics for Clean Virginia.

Shenstone-Harris, S., M. Whited, K. Takahashi, S. Schadler, A. Fuzaylov, I. Weiss. 2025. *How Will Future Electric Vehicle Adoption and Building Electrification Affect Electric Rates?* New Jersey Factsheet. Synapse Energy Economics for Natural Resources Defense Council.

Shenstone-Harris, S., M. Whited, K. Takahashi, S. Schadler, A. Fuzaylov, I. Weiss. 2025. *How Will Future Electric Vehicle Adoption and Building Electrification Affect Electric Rates?* New Mexico Factsheet. Synapse Energy Economics for Natural Resources Defense Council.

Takahashi, K., C. Lane, M. Whited, S. Schadler, T. Gyalmo, A. Zeng, A. S. Hopkins. 2024. *Charging Minnesota's Electric Vehicles; Strategies that Work for the Electric Grid and Consumers*. Synapse Energy Economics for Minnesota Department of Commerce, Division of Energy Resources.

Yuang, C., M. Whited, T. Nguyen, S. Schadler, R. Anderson, W. Dejeanlouis, C. Palmer, C. Mattioda, A. Glaser Schoff, S. Koester, J. Hittinger, P. Eash-Gates. 2024. *Utility Engagement Playbook for Industrial Customers: Addressing Power Sector Barriers to Electrification*. Synapse Energy Economics and World Wildlife Fund for Renewable Thermal Collaborative.

Whited, M., P. Knight, S. Kwok, P. Silva. 2024. *Charting the Wind: Quantifying the Ratepayer, Climate, and Public Health Benefits of Offshore Wind in New England*. Synapse Energy Economics for Sierra Club.

Shenstone-Harris, S., A. Zeng, L. Metz, M. Whited. 2024. *On the Road to Fleet Electrification: A Framework for Estimating Distribution System Impacts of Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for Advanced Energy United.

Borden, E., B. Havumaki, A. Lawton, M. Whited. 2023. *Establishing Income Based Fixed Charged in California*. Synapse Energy Economics for The Utility Reform Network and Natural Resources Defense Council.

Metz, L., M. Whited, P. Rhodes, E. Carlson. 2023. *Distribution System Investments to Enable Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for the Environmental Defense Fund.

Whited, M. 2021. *Implementing PBR with Customer Protections in North Carolina: Docket E-100, Sub 178*. Synapse Energy Economics for the Carolina Utility Customers Association.

Kallay, J., A. Napoleon, J. Hall, B. Havumaki, A. Hopkins, M. Whited, T. Woolf, J. Stevenson, R. Broderick, R. Jeffers, B. Garcia. 2021. *Regulatory Mechanisms to Enable Investments in Electric Utility Resilience*. Synapse Energy Economics for Sandia National Laboratories.

Kallay, J., A. Napoleon, B. Havumaki, J. Hall, C. Odom, A. Hopkins, M. Whited, T. Woolf, M. Chang, R. Broderick, R. Jeffers, B. Garcia. 2021. *Performance Metrics to Evaluate Utility Resilience Investments*. Synapse Energy Economics for Sandia National Laboratories.

Kallay, J., A. Hopkins, A. Napoleon, B. Havumaki, J. Hall, M. Whited, M. Chang., R. Broderick, R. Jeffers, K. Jones, M. DeMenno. 2021. *The Resilience Planning Landscape for Communities and Electric Utilities*. Synapse Energy Economics for Sandia National Laboratories.

Woolf, T., L. Schwartz, B. Havumaki, D. Bhandari, M. Whited. 2021. *Benefit-Cost Analysis for Utility-Facing Grid Modernization Investments: Trends, Challenges, and Considerations*. Prepared by Lawrence Berkeley National Laboratory and Synapse Energy Economics for the Grid Modernization Laboratory Consortium of the U.S. Department of Energy.

Camp, E., B. Havumaki, T. Vitolo, M. Whited. 2020. *Future of Solar PV in the District of Columbia: Feasibility, Projections, and Rate Impacts of the District's Expanded RPS*. Synapse Energy Economics for the District of Columbia Office of the People's Counsel.

National Energy Screening Project. 2020. *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources*. E4TheFuture, Synapse Energy Economics, Energy Futures Group, ICF, Pace Energy and Climate Center, Schiller Consulting, Smart Electric Power Alliance.

Whited, M., J. Frost, B. Havumaki. 2020. *Best Practices for Commercial and Industrial EV Rates*. A guide prepared by Synapse Energy Economics for Natural Resources Defense Council.

Knight, P., E. Camp, D. Bhandari, J. Hall, M. Whited, B. Havumaki, A. Allison, N. Peluso, T. Woolf. 2019. *Making Electric Vehicles Work for Utility Customers: A Policy Handbook for Consumer Advocates*. Synapse Energy Economics for the Energy Foundation.

White, D., K. Takahashi, M. Whited, S. Kwok, D. Bhandari. 2019. *Memphis and Tennessee Valley Authority: Risk Analysis of Future TVA Rates for Memphis*. Synapse Energy Economics for Friends of the Earth.

Whited, M., B. Havumaki. 2019. *GD2019 04 M: DC DOEE Comments Responding to Notice of Inquiry*. Synapse Energy Economics for the District of Columbia Department of Energy and Environment.

Whited, Melissa. 2019. *DCG Comments on Technical Conference III Regarding F.C. 1156*. Synapse Energy Economics for the District of Columbia Department of Energy and Environment.

Whited, M., C. Roberto. 2019. *Multi-Year Rate Plans: Core Elements and Case Studies*. Synapse Energy Economics for Maryland PC51 and Case 9618.

Knight, P., E. Camp, C. Odom, E. Malone, M. Whited, J. Hall. 2019. *Exploring Equity in Residential Solar: A preliminary examination of who is installing solar in the Commonwealth of Massachusetts*. Synapse Energy Economics.

Hopkins, A. S., K. Takahashi, D. Glick, M. Whited. 2018. *Decarbonization of Heating Energy Use in California Buildings: Technology, Markets, Impacts, and Policy Solutions*. Synapse Energy Economics for the Natural Resources Defense Council.

Whited, M., J. Kallay, D. Bhandari, B. Havumaki. 2018. *Driving Transportation Electrification Forward in Pennsylvania: Considerations for Effective Transportation Electrification Ratemaking*. Synapse Energy Economics for Natural Resources Defense Council.

Hall, J., J. Kallay, A. Napoleon, K. Takahashi, M. Whited. 2018. *Locational and Temporal Values of Energy Efficiency and other DERs to Transmission and Distribution Systems*. Synapse Energy Economics.

Woolf, T., J. Hall, M. Whited. 2018. *Earnings Adjustment Mechanisms to Support New York REV Goals: Outcome-Based, Program-Based, and Action-Based Options*. Synapse Energy Economics for Advanced Energy Economy Institute.

Whited, M., A. Allison, R. Wilson. 2018. *Driving Transportation Electrification Forward in New York: Considerations for Effective Transportation Electrification Rate Design*. Synapse Energy Economics on behalf of the Natural Resources Defense Council.

Allison, A. and M. Whited. 2018. "Electric Vehicles Still Not Crashing the Grid: Updates from California." Synapse Energy Economics on behalf of the Natural Resources Defense Council.

Fisher, J., M. Whited, T. Woolf, D. Goldberg. 2018. *Utility Investments for Market Transformation: How Utilities Can Help Achieve Energy Policy Goals*. Synapse Energy Economics for Energy Foundation.

Whited, M., T. Woolf. 2018. *Electricity Prices in the Tennessee Valley: Are customers being treated fairly?* Synapse Energy Economics for the Southern Alliance for Clean Energy.

Woolf, T., A. Hopkins, M. Whited, K. Takahashi, A. Napoleon. 2018. *Review of New Brunswick Power's 2018/2019 Rate Case Application*. In the Matter of the New Brunswick Power Corporation and Section 103(1) of the Electricity Act Matter No. 375. Synapse Energy Economics for the New Brunswick Energy and Utilities Board Staff.

Whited, M., T. Vitolo. 2017. Reply comments in District of Columbia Public Service Commission Formal Case No. 1130: *Reply Comments of the Office of the People's Counsel for the District of Columbia Regarding Pepco's Comments on the Office of the People's Counsel's Value of Solar Study*. Synapse Energy Economics. July 24, 2017.

Whited, M., A. Horowitz, T. Vitolo, W. Ong, T. Woolf. 2017. *Distributed Solar in the District of Columbia: Policy Options, Potential, Value of Solar, and Cost-Shifting*. Synapse Energy Economics for the Office of the People's Counsel for the District of Columbia.

Whited, M., E. Malone, T. Vitolo. 2016. *Rate Impacts on Customers of Maryland's Electric Cooperatives: Impacts on SMECO and Choptank Customers*. Synapse Energy Economics for Maryland Public Service Commission.

Woolf, T., M. Whited, P. Knight, T. Vitolo, K. Takahashi. 2016. *Show Me the Numbers: A Framework for Balanced Distributed Solar Policies*. Synapse Energy Economics for Consumers Union.

Whited, M., T. Woolf, J. Daniel. 2016. *Caught in a Fix: The Problem with Fixed Charges for Electricity*. Synapse Energy Economics for Consumers Union.

Lowry, M. N., T. Woolf, M. Whited, M. Makos. 2016. *Performance-Based Regulation in a High Distributed Energy Resources Future*. Pacific Economics Group Research and Synapse Energy Economics for Lawrence Berkley National Laboratory.

Woolf, T., M. Whited, A. Napoleon. 2015-2016. *Comments and Reply Comments in the New York Public Service Commission Case 14-M-0101: Reforming the Energy Vision*. Comments related to Staff's (a) a benefit-costs analysis framework white paper, (b) ratemaking and utility business models white paper, and (c) Distributed System Implementation Plan guide. Synapse Energy Economics on behalf of Natural Resources Defense Council and Pace Energy and Climate Center.

Luckow, P., B. Fagan, S. Fields, M. Whited. 2015. *Technical and Institutional Barriers to the Expansion of Wind and Solar Energy*. Synapse Energy Economics for Citizens' Climate Lobby.

Wilson, R., M. Whited, S. Jackson, B. Biewald, E. A. Stanton. 2015. *Best Practices in Planning for Clean Power Plan Compliance*. Synapse Energy Economics for the National Association of State Utility Consumer Advocates.

Whited, M., T. Woolf, A. Napoleon. 2015. *Utility Performance Incentive Mechanisms: A Handbook for Regulators*. Synapse Energy Economics for the Western Interstate Energy Board.

Stanton, E. A., S. Jackson, B. Biewald, M. Whited. 2014. *Final Report: Implications of EPA's Proposed "Clean Power Plan."* Synapse Energy Economics for the National Association of State Utility Consumer Advocates.

Peterson, P., S. Fields, M. Whited. 2014. *Balancing Market Opportunities in the West: How participation in an expanded balancing market could save customers hundreds of millions of dollars.* Synapse Energy Economics for the Western Grid Group.

Woolf, T., M. Whited, E. Malone, T. Vitolo, R. Hornby. 2014. *Benefit-Cost Analysis for Distributed Energy Resources: A Framework for Accounting for All Relevant Costs and Benefits.* Synapse Energy Economics for the Advanced Energy Economy Institute.

Peterson, P., M. Whited, S. Fields. 2014. *Synapse Comments on FAST Proposals in ERCOT.* Synapse Energy Economics for Sierra Club.

Hornby, R., N. Brockway, M. Whited, S. Fields. 2014. *Time-Varying Rates in the District of Columbia.* Synapse Energy Economics for the Office of the People's Counsel for the District of Columbia, submitted to Public Service Commission of the District of Columbia in Formal Case No. 1114.

Peterson, P., M. Whited, S. Fields. 2014. *Demonstrating Resource Adequacy in ERCOT: Revisiting the ERCOT Capacity, Demand and Reserves Forecasts.* Synapse Energy Economics for Sierra Club – Lone Star Chapter.

Stanton, E. A., M. Whited, F. Ackerman. 2014. *Estimating the Cost of Saved Energy in Utility Efficiency Programs.* Synapse Energy Economics for the U.S Environmental Protection Agency.

Ackerman, F., M. Whited, P. Knight. 2014. "Would banning atrazine benefit farmers?" *International Journal of Occupational and Environmental Health* 20 (1): 61–70.

Ackerman, F., M. Whited, P. Knight. 2013. *Atrazine: Consider the Alternatives.* Synapse Energy Economics for Natural Resources Defense Council (NRDC).

Whited, M., F. Ackerman, S. Jackson. 2013. *Water Constraints on Energy Production: Altering our Current Collision Course.* Synapse Energy Economics for Civil Society Institute.

Whited, M. 2013. *Water Constraints on Energy Production: Altering our Current Collision Course – Policy Brief.* Synapse Energy Economics for Civil Society Institute.

Hurley, D., P. Peterson, M. Whited. 2013. *Demand Response as a Power System Resource: Program Designs, Performance, and Lessons Learned in the United States.* Synapse Energy Economics for Regulatory Assistance Project.

Whited, M., D. White, S. Jackson, P. Knight, E.A. Stanton. 2013. *Declining Markets for Montana Coal.* Synapse Energy Economics for Northern Plains Resource Council.

Woolf, T., M. Whited, T. Vitolo, K. Takahashi, D. White. 2012. *Indian Point Energy Center Replacement Analysis: A Plan for Replacing the Nuclear Plant with Clean, Sustainable, Energy Resources*. Synapse Energy Economics for National Resources Defense Council and Riverkeeper.

Whited, M., K. Charipar, G. Brown. *Demand Response Potential in Wisconsin*. Nelson Institute for Environmental Studies, Energy Analysis & Policy Capstone for the Wisconsin Public Service Commission.

Whited, M. 2010. "Economic Impacts of Irrigation Water Transfers in Uvalde County, Texas." *Journal of Regional Analysis and Policy* 40 (2): 160–170.

Grabow, M., M. Hahn and M. Whited. 2010. *Valuing Bicycling's Economic and Health Impacts in Wisconsin*. Nelson Institute for Environmental Studies, Center for Sustainability and the Global Environment (SAGE) for State Representative Spencer Black.

Whited, M., D. Bernhardt, R. Deitchman, C. Fuchsteiner, M. Kirby, M. Krueger, S. Locke, M. Mcmillen, H. Moussavi, T. Robinson, E. Schmitz, Z. Schuster, R. Smail, E. Stone, S. Van Egeren, H. Yoshida, Z. Zopp. 2009. *Implementing the Great Lakes Compact: Wisconsin Conservation and Efficiency Measures Report*. Department of Urban and Regional Planning, University of Wisconsin-Madison, Extension Report 2009-01.

Whited, M. 2009. *2009 Wisconsin Water Fact Sheet*. Public Service Commission of Wisconsin.

Whited, M. 2003. *Gender, Water, and Trade*. International Gender and Trade Network Washington, DC.

TESTIMONY AND COMMENTS

Indiana Utility Regulatory Commission (Cause No. 46120): Direct Testimony of Melissa Whited addressing the appropriate return on equity for Northern Indiana Public Service Company in light of its high rates and recent dismal performance related to customer satisfaction and reliability. On behalf of La Porte County Board of Commissioners. December 19, 2024.

Colorado Public Utilities Commission (Proceeding No. 24AL-0275E): Answer Testimony of Melissa Whited regarding the design of electrification rates in the Matter of Black Hills Energy to increase base rates for residential and small commercial customer classes. On behalf of Sierra Club and Western Resource Advocates. October 11, 2024.

New York Public Service Commission (Cases 24-E-0322 and 24-G-0323): Direct Testimony of Melissa Whited, Caroline Palmer, and Ben Havumaki addressing the cost of service study and revenue allocation proposals submitted by Niagara Mohawk Power Corporation (National Grid).

Nova Scotia Utility and Review Board (Matter No. M11621): Direct Testimony of Melissa Whited in the Matter of the Public Utilities Act and In the Matter of a review of Nova Scotia Power Incorporated's Final Report for the Smart Grid Nova Scotia Project. On behalf of Counsel to Nova Scotia Utility and Review Board. May 28, 2024.

Massachusetts Department of Public Utilities (Docket No. 23-150): Direct testimony of Melissa Whited regarding National Grid’s electrification pricing proposal, performance incentive mechanisms, and Infrastructure, Safety, Reliability & Electrification cost recovery mechanism. On behalf of the Massachusetts Department of Energy Resources. March 29, 2024.

Nova Scotia Utility and Review Board (Matter No. M10832): Direct Testimony of Melissa Whited regarding the Town of Mahone Bay Electric Utility’s application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. January 11, 2023.

Nova Scotia Utility and Review Board (Matter No. M10810): Direct Testimony of Melissa Whited regarding Riverport Electric Light Commission’s application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. December 23, 2022.

Public Utilities Commission of Maine (Docket No. 2022-00152): Direct Testimony of Melissa Whited and Eric Borden regarding Central Maine Power Company’s request for rate design increase and changes. On behalf of the Maine Office of the Public Advocate. December 2, 2022.

Massachusetts Department of Public Utilities (Docket No. 21-91): Direct testimony of Melissa Whited regarding National Grid’s demand charge alternative proposal, and its implications for the adoption of electric vehicles. On behalf of the Natural Resources Defense Council, Union of Concerned Scientists, and Sierra Club. May 27, 2022.

Illinois Commerce Commission (Docket No. 22-0067): Direct Testimony of Melissa Whited and Ben Havumaki regarding the performance incentive mechanisms and tracking metrics proposed by Commonwealth Edison Company and Ameren Illinois Company. April 6, 2022.

Maryland Public Service Commission (Case No. 9670): Direct testimony of Melissa Whited regarding Delmarva Power and Light’s proposed rate designs. On behalf of Maryland Office of People’s Counsel. December 2, 2021.

New Hampshire Public Utilities Commission (Docket DE 21-030): Direct Testimony of Melissa Whited and Ben Havumaki regarding Unitil’s proposed rate increase for the residential class, multi-year rate plan, revenue decoupling mechanism, and grid modernization investments. On behalf of the New Hampshire Office of the Consumer Advocate. November 23, 2021.

Nova Scotia Utility and Review Board (Matter No. M10176): Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.’s proposed Smart Grid Nova Scotia Solar Garden Rider. On behalf of Counsel to the Nova Scotia Utility and Review Board. August 18, 2021.

Public Service Commission of Florida (Docket No. 20210015-EI): Direct Testimony of Melissa Whited regarding Florida Power and Light’s petition for rate increase. On behalf of Vote Solar. June 21, 2021.

Colorado Public Utilities Commission (Proceeding No. 20AL-0432E): Answer testimony of Melissa Whited regarding inclining block rates. On behalf of Energy Outreach Colorado. March 8, 2021.

Maryland Public Service Commission (Case No. 9655): Direct and surrebuttal testimony of Melissa Whited regarding Pepco's proposed multi-year plan and performance incentive mechanisms. On behalf of Maryland Office of People's Counsel. March 3, 2021.

Nova Scotia Utility and Review Board (Matter No. M09777): Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.'s proposed time-varying pricing tariff application. On behalf of Counsel to the Nova Scotia Utility and Review Board. February 24, 2021.

Newfoundland and Labrador Board of Commissioners of Public Utilities (Reference to the Board Rate Mitigation Options and Impacts of the Muskrat Falls Project): *Phase 2 Report on Muskrat Falls Project Rate Mitigation*. Expert Report. Prepared for the Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador. September 3, 2019.

Georgia Public Service Commission (Docket No. 42516): Direct testimony of Melissa Whited and Ben Havumaki regarding Georgia Power's proposal to increase the customer charge for residential customers. On behalf of the Sierra Club. October 17, 2019.

Maine Public Utilities Commission (Docket No. 2018-00171): Direct testimony of Melissa Whited regarding utility incentives for non-wires alternatives. On behalf of Maine Office of the Public Advocate. December 17, 2018.

Rhode Island Public Utilities Commission (Docket No. 4780): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Power Sector Transformation proposals. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 28, 2018.

Rhode Island Public Utilities Commission (Docket No. 4770): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's proposed performance incentive mechanisms, benefit-cost analyses, and request for recovery of costs for its Advanced Metering Functionality study and distributed energy resources enablement investments. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 6, 2018.

Rhode Island Public Utilities Commission (Docket No. 4783): Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Advanced Metering Functionality Pilot. On behalf of the Rhode Island Division of Public Utilities and Carriers. February 22, 2018.

Virginia State Corporation Commission (Case No. PUR-2017-00044): Direct testimony of Melissa Whited regarding Rappahannock Electric Cooperative's proposed increases to fixed charges for residential customers and small business customers. On behalf of Sierra Club. September 19, 2017.

California Public Utilities Commission (Application 17-01-020, 17-01-021, and 17-01-022): Joint opening testimony with Max Baumhefner and Katherine Stainken on fast charging infrastructure and rates; joint opening testimony with Max Baumhefner and Joel Espino on medium and heavy-duty and fleet charging infrastructure and commercial EV rates; joint opening testimony with Max Baumhefner and Chris King

on residential charging infrastructure and rates. Rebuttal testimony on public fast charging rate design, commercial EV rate design, and residential EV rate design. On behalf of Natural Resources Defense Council, the Greenlining Institute, Plug In America, the Coalition of California Utility Employees, Sierra Club, and the Environmental Defense Fund. July 25, August 1, August 7, and September 5, 2017.

New York Public Service Commission (Case 17-E-0238): Direct and rebuttal testimony of Tim Woolf and Melissa Whited regarding Earnings Adjustment Mechanisms proposed by National Grid. On behalf of Advanced Energy Economy Institute. August 25 and September 15, 2017.

Utah Public Service Commission (Docket No. 14-035-114): Direct testimony of Melissa Whited regarding PacifiCorp's proposed rates for customers with distributed generation. On behalf of Utah Clean Energy. June 8, 2017.

Texas Public Utilities Commission (SOAH Docket No. 473-17-1764, PUC Docket No. 46449): Cross-rebuttal testimony evaluating Southwestern Electric Power Company's proposed revisions to its Distributed Renewable Generation tariff. On behalf of Sierra Club and Dr. Lawrence Brough. May 19, 2017.

Massachusetts Department of Public Utilities (Docket No. 17-05): Direct and surrebuttal testimony of Tim Woolf and Melissa Whited regarding performance-based regulation, the monthly minimum reliability contribution, storage pilots, and rate design in Eversource's petition for approval of rate increases and a performance-based ratemaking mechanism. On behalf of Sunrun and the Energy Freedom Coalition of America, LLC. April 28, 2017 and May 26, 2017.

Public Utilities Commission of Hawaii (Docket No. 2015-0170): Direct testimony regarding Hawaiian Electric Light Company's proposed performance incentive mechanisms. On behalf of the Division of Consumer Advocacy. April 28, 2017.

Massachusetts Department of Public Utilities (Docket No. 15-155): Joint direct and rebuttal testimony with T. Woolf regarding National Grid's rate design proposal. On behalf of Energy Freedom Coalition of America, LLC. March 18, 2016 and April 28, 2016.

Federal Energy Regulatory Commission (Docket No. EC13-93-000): Affidavit regarding potential market power resulting from the acquisition of Ameren generation by Dynegy. On behalf of Sierra Club. August 16, 2013.

Wisconsin Senate Committee on Clean Energy: Joint testimony with M. Grabow regarding the importance of clean transportation to Wisconsin's public health and economy. February 2010.

TESTIMONY ASSISTANCE

Colorado Public Utilities Commission (Proceeding No. 16AL-0048E): Answer testimony of Tim Woolf regarding Public Service Company of Colorado's rate design proposal. On behalf of Energy Outreach Colorado. June 6, 2016.

Nevada Public Utilities Commission (Docket Nos. 15-07041 and 15-07042): Direct testimony on NV Energy's application for approval of a cost of service study and net metering tariffs. On behalf of The Alliance for Solar Choice. October 27, 2015.

Missouri Public Service Commission (Case No. ER-2014-0370): Direct and surrebuttal testimony on the topic of Kansas City Power and Light's rate design proposal. On behalf of Sierra Club. April 16, 2015 and June 5, 2015.

Wisconsin Public Service Commission (Docket No. 05-UR-107): Direct and surrebuttal testimony of Rick Hornby regarding Wisconsin Electric Power Company rate case. On behalf of The Alliance for Solar Choice. August 28, 2014 and September 22, 2014.

Maine Public Utilities Commission (Docket No. 2013-00519): Direct testimony of Richard Hornby and Martin R. Cohen on GridSolar's smart grid coordinator petition. On behalf of the Maine Office of the Public Advocate. August 28, 2014.

Maine Public Utilities Commission (Docket No. 2013-00168): Direct and surrebuttal testimony of Tim Woolf regarding Central Maine Power's request for an alternative rate plan. December 12, 2013 and March 21, 2014.

Massachusetts Department of Public Utilities (Docket No. 14-04): Comments of Massachusetts Department of Energy Resources on investigation into time varying rates. On behalf of the Massachusetts Department of Energy Resources. March 10, 2014.

State of Nevada, Public Utilities Commission of Nevada (Docket No. 13-07021): Direct testimony of Frank Ackerman regarding the proposed merger of NV Energy, Inc. and MidAmerican Energy Holdings Company. On behalf of the Sierra Club. October 24, 2013.

PRESENTATIONS

Whited, M. 2024. "Benefits of Offshore Wind in New England" Webinar presentation sponsored by Sierra Club, June 24, 2024.

Whited, M. 2021. "Evolution of Net Metering in Hawaii." Presentation to the NARUC Winter Policy Summit. February 4.

Biewald, B., M. Whited. "Evaluating and Shaping the Impacts of EVs on Customers: Tools for Consumer Advocates." Presentation at the NASUCA Mid-Year Meeting, June 19, 2019.

Whited, M. 2019. "Performance Incentive Mechanisms." Presentation to the 2019 Pennsylvania Public Utility Law Conference, Harrisburg, PA. May 31.

Whited, M. 2018. "Smart Non-Residential Rate Design: Designing for the Future." Presentation to the NARUC Annual Meeting, Orlando, FL. November 11.

Whited, M. 2016. "Energy Policy for the Future: Trends and Overview." Presentation to the National Conference of State Legislators' Capitol Forum, Washington, DC, December 8.

Whited, M. 2016. "Ratemaking for the Future: Trends and Considerations." Presentation to the Midwest Governors' Association, St. Paul, MN, July 14.

Whited, M. 2016. "Performance Based Regulation." Presentation to the NARUC Rate Design Subcommittee. September 12.

Whited, M. 2016. "Demand Charges: Impacts and Alternatives (A Skeptic's View)." EUCI 2nd Annual Residential Demand Charges Summit, Phoenix, AZ, June 7.

Whited, M. 2016. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Wisconsin Workshop, Madison WI, March 29.

Whited, M., T. Woolf. 2016. "Caught in a Fix: The Problem with Fixed Charges for Electricity." Webinar presentation sponsored by Consumers Union, February.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Learning Lab on New Utility Business Models & the Electricity Market Structures of the Future, Boston, MA, July 28.

Whited, M. 2015. "Rate Design: Options for Addressing NEM Impacts." Presentation to the Utah Net Energy Metering Workgroup, Workshop 4, Salt Lake City, UT, July 8.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the e21 Initiative, St. Paul, MN, May 29.

Whited, M., F. Ackerman. 2013. "Water Constraints on Energy Production: Altering our Current Collision Course." Webinar presentation sponsored by Civil Society Institute, September 12.

Whited, M., G. Brown, K. Charipar. 2011. "Electricity Demand Response Programs and Potential in Wisconsin." Presentation to the Wisconsin Public Service Commission, April.

Whited, M. 2010. "Economic Impact of Irrigation Water Transfers in Uvalde County, Texas." Presentation at the Mid-Continent Regional Science Association's 41st Annual Conference/IMPLAN National User's 8th Biennial Conference in St. Louis, MO, June

Whited, M., M. Grabow, M. Hahn. 2009. "Valuing Bicycling's Economic and Health Impacts in Wisconsin." Presentation before the Governor's Coordinating Council on Bicycling, December.

Whited, M., D. Sheard. 2009. "Water Conservation Initiatives in Wisconsin." Presentation before the Waukesha County Water Conservation Coalition Municipal Water Conservation Subgroup, July.

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