

# **Schedule “A”**

**WHITFIELD RUSSELL ASSOCIATES  
PUBLIC UTILITY CONSULTANTS**

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**STATEMENT  
OF  
QUALIFICATIONS**

## **WHITFIELD RUSSELL ASSOCIATES**

Whitfield Russell Associates is a public utility consulting firm providing analyses in all areas of electric utility regulation. The members of the firm have training and experience in engineering, finance, accounting, economics, law, and computer science. The firm provides expertise in electric utility system planning and operations, computer modeling, project evaluation, economic studies, contract negotiations, energy and demand forecasts, and rate determinations and design.

Whitfield Russell Associates was formed in 1976. Currently, the firm has seven staff members and is located at 4232 King Street Alexandria, VA 22302. The firm's e-mail address is "wrussell@wrassoc.com", and the telephone number is (703) 894-2200.

Whitfield Russell Associates' professionals have appeared as regulatory and litigation expert witnesses on electric utility planning, operations, contracts and rates before State and federal courts and agencies in more than 30 States, the District of Columbia, and three Canadian Provinces.

Clients of the firm have included electric utilities owned by investors, municipalities, cooperatives, States and State subdivisions; large industrial generators and energy consumers; State agencies and commissions; federal agencies and other subdivisions of the United States government; independent power producers, Canadian First Nations, provinces and agencies; and Native American governments and agencies.

Industrial enterprises for which Whitfield Russell Associates has worked include The Dow Chemical Company, its partially-owned subsidiary, Destec Energy, Exxon, Newmont Gold Company, Barrick Goldstrike Mines, MidAtlantic Cogen Inc., the Westlake Group, Gallatin Steel, Cyprus Minerals, FMC Corporation, Big Three Industries, Occidental Petroleum, Coastal Power Production, Ethyl Corporation, Zeigler Coal, Triton Coal (Shell Oil), O'Brien Energy, AES, Foster Wheeler, Wheelabrator-Frye, Phibro (oil refinery) and British Petroleum. Other

clients include the Cities of Chicago, Indianapolis, Gillette (WY), Madison (NJ), North California Power Agency, Massachusetts Municipal Wholesale Electric Company, North Carolina Eastern Municipal Power Agency, the Northern California Power Agency, the States of Colorado, South Dakota, Minnesota, South Carolina, Pennsylvania, and Hawaii, and the District of Columbia.

Additionally, Whitfield Russell Associates is nationally recognized as a leader in electric utility regulatory issues, electric utility competition, transmission access, and the unbundling of traditional electric utility services. Mr. Russell has lectured on such issues many times including at the Regulatory Studies Program sponsored by the National Association of Regulatory Utility Commissioners at Michigan State University, at the Wisconsin Public Service Commission, at various seminars of the American Public Power Association and of California's TURN and at the Annual Conference of the Electricity Consumers Resource Council. Whitfield Russell Associates has participated in the development of a national transmission access proposal submitted to the Federal Energy Regulatory Commission on behalf of the Transmission Access Policy Study Group (TAPS), and its partners have testified before the Subcommittee on Energy and Power of the House Committee on Energy and Commerce and before the Pennsylvania House Committee on Conservation regarding electric transmission issues.

## **KEY PERSONNEL**

## **WHITFIELD A. RUSSELL**

Whitfield A. Russell is an electrical engineer, attorney and President of Whitfield A. Russell and Associates, P.C., a corporate Partner of Whitfield Russell Associates. He holds a Bachelor of Science degree in Electrical Engineering from the University of Maine at Orono, a Master of Science in Electrical Engineering from the University of Maryland, and a Juris Doctor degree from Georgetown University Law Center.

Mr. Russell is experienced in electric utility system planning (transmission and generation), ratemaking and bulk power contracts. Mr. Russell has been qualified as an expert witness in 27 states (as well as in the Provinces of Alberta, Manitoba and Ontario and the District of Columbia) and has been accepted as an expert in more than 150 proceedings before state and federal Courts, arbitration panels, public service commissions, the Federal Energy Regulatory Commission and other administrative agencies. Mr. Russell's clients have included public power utilities, state and federal power marketing agencies, investor owned utilities, large industrial generators and consumers, independent power producers, Native American governments, Canadian First Nations and State regulatory bodies and their staffs.

Mr. Russell founded Whitfield Russell Associates in 1976. From 1972 to 1976, Mr. Russell served as Engineer and subsequently as Chief Engineer, at the Division of Corporate Regulation of the Securities and Exchange Commission. The Division administered the Public Utility Holding Company Act of 1935.

From 1971 to 1972, Mr. Russell was on the staff of the Federal Power Commission. He served as a consultant to staff attorneys in proceedings, and as an expert witness in an administrative proceeding before the Atomic Energy Commission.

From 1969 to 1971, Mr. Russell served as an Associate Engineer in the System Planning Department of the Potomac Electric Power Company. At PEPCO, he conducted system studies of load flows and stability. He was also a member of numerous study groups concerned with

planning and operation of the Pennsylvania-New Jersey-Maryland Interconnection.

### **OTHER**

Mr. Russell testified before the Subcommittee on Energy and Power of the House Committee on Energy and Commerce. His testimony favored a transmission bill which was subsequently enacted as Title VII of the Energy Policy Act of 1992.

Mr. Russell was an arbitrator in a dispute between Big Rivers Electric Cooperative and the Municipal Energy Agency of Mississippi.

Lectures given at the Regulatory Studies Program sponsored by the National Association of Regulatory Utility Commissioners at Michigan State University. Topics include revenue requirements, system planning and power pooling.

Lecture given at the Wisconsin Public Service Commission Seminar on "Regulating Diversified Electric Utilities: Accounting and Financial Issues."

Lecture given at the Annual Conference of the Electricity Consumers Resource Council on the Pacific Northwest-Pacific Southwest Intertie.

Participated in the development of a national transmission access proposal submitted to the Federal Energy Regulatory Commission on behalf of the Transmission Access Policy Study Group.

For a number of years, Mr. Russell controlled two companies owning small hydro plants in Maine that are PURPA qualifying facilities.

**Proceedings In Which  
Whitfield A. Russell  
Has Testified**

**PROCEEDINGS IN WHICH MR. RUSSELL HAS PROVIDED EVIDENCE**

1. Anaheim v. Kleppe, U.S. District Court, Arizona (Civil No. 74-542 PHX-WEC), concerning the availability of transmission capacity in the Pacific Southwest.
2. In re: Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 7004, concerning the need for proposed 500 kV transmission lines in the Washington, D.C. area.
3. In re: Baltimore Gas and Electric Company, and Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 6984, involving the same transmission lines mentioned in the preceding case.
4. Perry v. The City of Monroe, Louisiana (State of Louisiana, Parish of Ouachita, Fourth District Court; Nos. 111145, 111146, 111147 filed August 16, 1977) regarding the necessity of Monroe's disposing of its municipal utility system.
5. In re: Potomac Electric Power Company, before the District of Columbia Public Service Commission, in Case No. 685, concerning the system planning of the Potomac Electric Power Company and the PJM Pool.
6. In re: Generic Hearings on Rate Structure, before the Colorado Public Utilities Commission, Case No. 5693, regarding the engineering aspects of marginal cost pricing and power pooling in Colorado.
7. In re: Pacific Gas and Electric Company, FERC Docket No. ER76-532, regarding the proper level of rates to be charged by PG&E to the Central Valley Project for transmission service.
8. In re: Pacific Power and Light Company, FERC Docket No. E-7796, regarding the Seven Party Agreement and related matters.
9. In re: Pacific Gas and Electric Company, FERC Docket No. E-7777 (II), concerning the provisions of numerous bulk power arrangements governing electric utilities in California.
10. In re: Potomac Edison Company, before the Maryland Public Service Commission, Case No. 7055, concerning the need for a 230 kV transmission line in Montgomery County, Maryland.
11. In re: Delmarva Power and Light Company, before the Maryland Public Service Commission, Case Nos. 7239F, 7239G, 7239H, 7239I, 7239J, 7239K, 7239L, 7239M and



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- 7239N concerning fuel rate adjustments.
12. In re: Baltimore Gas and Electric Company, before the Maryland Public Service Commission, Case Nos. 7238G, 7238H, 7238I, 7238J, 7238L and combined dockets 7238P, Q, R and S, concerning fuel rates.
  13. In re: Potomac Electric Power Company, before the Maryland Public Service Commission, Case Nos. 7240A, 7240B, 7240C, 7240D, 7240E, 7240F and 7240G, concerning fuel rate adjustments.
  14. In re: Florida Power & Light Company, FERC Docket No. E-9574, concerning system planning for the City of Vero Beach, Florida. FP&L withdrew its application to acquire the Vero Beach system.
  15. In re: Oklahoma Gas and Electric Company, FERC Docket No. ER77-465, concerning rates for energy banking and transmission services rendered to the Western Farmers Electric Cooperative.
  16. In re: Idaho Power Company, before the Idaho Public Utility Commission, Case No. U-1006-158, concerning the value of interruptible industrial loads and Idaho Power Companies entitlement to Federal secondary energy.
  17. In re: Potomac Electric Power Company, before the District of Columbia Public Service Commission, Case No. 737, concerning the Company's construction program.
  18. In re: Virginia Electric and Power Company, before the Virginia State Corporation Commission, Case No. PUE 800006, concerning construction of transmission lines in the Charlottesville, Virginia area.
  19. In re: Pacific Gas and Electric Company, FERC Project Nos. 2735 and 1988, concerning the Helms Project, a pumped storage generating unit.
  20. Southeastern Power Administration v. Kentucky Utilities Company, FERC Docket No. EL 80-7, concerning SEPA's attempt to obtain a FERC wheeling order under the Public Utility Regulatory Policies Act of 1978.
  21. In re: Sierra Pacific Power Company, before the Public Service Commission of Nevada, Docket No. 81-105, concerning construction and transmission planning.
  22. In re: Virginia Electric and Power Company, before the North Carolina Utilities Commission, Docket No. E-22, Sub 257, concerning production cost simulation and normalized fuel adjustment clause formula.

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23. In re: the Investigation of the Capital Expansion For Electric Generation, before the New Mexico Public Service Commission, Case No. 1577, concerning construction programs of the Public Service Company of New Mexico and El Paso Electric Company.
24. In re: Potomac Edison Company, before the Maryland Public Service Commission, Case Nos. 7241A, 7241B, 7241C and 7241D, concerning fuel rate adjustments and productivity of generating units.
25. In re: Potomac Edison Company, before the Maryland Public Service Commission, Case No. 7528, concerning the method of calculating Potomac Edison's fuel rate.
26. In re: Delmarva Power & Light Company, before the Maryland Public Service Commission, Docket No. 7570, concerning transmission loss allocation methodology.
27. In re: Nebraska Public Power District, before the South Dakota Public Utilities Commission, Docket No. F-3371, concerning proposed construction and operation of the 500 kV MANDAN Transmission Facility.
28. In re: Sierra Pacific Power Company, before the Public Service Commission of Nevada, Docket No. 81-660, concerning construction and transmission planning.
29. In re: Kentucky Utilities Company, FERC Docket Nos. ER-81-341-000 and ER81-267-000, concerning construction planning and the market for short term power.
30. In re: Kentucky Power Company et al., before the Kentucky Public Service Commission, Case No. 8566, concerning cogeneration and avoided costs.
31. In re: Appalachian Power Company, before the West Virginia Public Service Commission, Case No. 82-162-42T, concerning the wholesale market and short-term power sales.
32. In re: Central Maine Power Company, before the Maine Public Utility Commission, Docket No. 82-137, concerning the application of Central Maine Power Company to reorganize in the form of a holding company.
33. In re: Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 4712, concerning rates to be paid to cogenerators and small power producers.
34. In re: Dow Chemical Company, before the Public Utility Commission of Texas, Docket Nos. 4802, 5050 and 5062, concerning rates for interruptible service.

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35. In re: Nevada Power Company, before the Nevada Public Service Commission, Docket No. 83-707, concerning the Reid Gardner No. 4 Participation Agreement.
36. Dow Chemical Company vs. Houston Lighting & Power Company, before the District Court of Brazoria County, Texas, 149th Judicial District, No. 79-F-2620, regarding the custom and usage of contract terms in the electric utility industry. Live direct testimony in a jury trial. No transcript available.
37. In re: The Montana Power Company and the Confederated Salish and Kootenai Tribes of the Flathead Reservation, Project Nos. 5-004 and 2776-000, concerning the Tribes' intention and ability to sell its output to one or more entities in the Western states, if obtaining the license to the Kerr Project.
38. In re: the Dow Chemical Company vs. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-16038, concerning cogeneration and small power production.
39. In re: Petition of the Dow Chemical Company, before the Public Utility Commission of Texas, Docket No. 5651, for an order compelling Houston Lighting & Power Company to comply with the Commission Order concerning cogeneration and small power production.
40. In re: Oklahoma Gas and Electric Company, before the Oklahoma Corporation Commission, Cause No. 29017, concerning priority for recognition of capacity costs to Qualifying Facilities.
41. In re: Kansas City Power & Light Company of Kansas City, Missouri, before the Missouri Public Service Commission, Case Nos. ER-85-128 and EO-85-185, regarding rate design and allocation of production-related costs for the Company's Wolf Creek Generating Station on behalf of the United States Department of Energy.
42. In re: Kansas City Power and Light Company, before the State Corporation Commission of the state of Kansas, Docket Nos. 142,099-U and 120,924-U, concerning operating problems caused by excess capacity, mitigation measures and regulatory requirements, on behalf of Johnson County Joint Intervenors.
43. In re: Duke Power Company, before the North Carolina Utilities Commission, Docket No. E-7, Sub 391, concerning the Company's use of an Extended Cold Shutdown program to mitigate its excess capacity situation resulting from the Catawba Units, on behalf of the Department of Justice for the State of North Carolina.
44. Sierra Pacific Power Company, before the Public Service Commission of the State of Nevada, Docket No. 85-430, on behalf of the State of Nevada Attorney General's Office of

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Advocate for Customers of Public Utilities, concerning the effects upon retail rates of placing Valmy Unit No. 2 in service.

45. United States of America Department of Energy, before the Bonneville Power Administration, on behalf of the City of Vernon, California, concerning the 1985 Proposed Firm Displacement Power Rate.
46. In re: City of Anaheim, et al., v. Southern California Edison, Docket No. 78-0810, on behalf of five partial requirements wholesale customers of Southern California Edison Company, making claims under Federal antitrust laws for access to the Pacific Northwest-Pacific Southwest Intertie.
47. In the Matter of the Application of Sierra Pacific Power Company for Approval of its 1986-2006 Electric Resource Plan, Docket No. 86-701, on behalf of the State of Nevada Attorney General's Office of Advocate for Customers of Public Utilities, concerning efforts of Sierra Pacific Power Company to develop a new interconnection (the SMUD Tie) with the Sacramento Municipal Utility District.
48. The Federal Executive Agencies, Complainant v. Public Service Company of Colorado, before the Public Utilities Commission of the State of Colorado, Case No. 6551, on behalf of the Federal Executive Agencies concerning the feasibility of wheeling federal preference power to the Government's facilities at Rocky Flats, the Lowry Air Force Base, the Rocky Flats Technical Center and the Denver Federal Center.
49. Commonwealth Edison Company, before the State of Illinois, Illinois Commerce Commission, Docket Nos. 87-0043, 87-0044 and 87-0057 Consolidated, on behalf of Intervenor, Citizen's Utility Board of Illinois, concerning Edison's proposal to form a generating subsidiary.
50. Nevada Power Company, before the Nevada Public Service Commission, Docket No. 87-750, concerning a 345 kV transmission line proposed to connect Nevada Power Company to Utah Power and Light Company.
51. Utah Power & Light Company, PacifiCorp, PC/UP&L Merging Corporation, FERC Docket No. EC88-2-000, establishing conditions for the proposed merger; also challenging PP&L's/UP&L's assertion that the claimed coordination benefits would not be attainable through power pooling or by contract.
52. Rosemount Cogeneration Joint Venture, Biosyn Chemical Corporation and Oxbow Power Corporation vs. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E-002/GG-88-491, on behalf of Petitioners, Rosemount Cogeneration Joint Venture, Biosyn Chemical Corporation and Oxbow Power Corporation, concerning a contract between Northern States Power and Biosyn Chemical Corporation

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covering the 50 MW output of a yet-to-be-constructed power plant based on the forecast costs of Sherburne County Unit #3 ("Sherco Unit 3").

53. In re: Potomac Electric Power Company, before the District of Columbia Public Service Commission, Case No. 869, on behalf of the District of Columbia Office of the People's Counsel, concerning the prudence of off-system purchases.
54. In re: Wisconsin Public Power Inc. System, Advance Plan 5, before the Public Service Commission of the state of Wisconsin, on behalf of the Wisconsin Public Power System, Inc., concerning transmission planning in the state of Wisconsin.
55. In re: Nevada Power Company, before the Public Service Commission of Nevada, Docket No. 88-701, on behalf of the Attorney General's Office of Advocate for Customers of Public Utilities, concerning NPC's 1988 Resource Plan.
56. In re: Commonwealth Edison Company, before the Illinois Commerce Commission, Docket Nos. 87-0427, 87-0169, 88-0189 and 88-0219, on behalf of the Citizens Utility Board, concerning rejection of an unfair, Staff-proposed rate order.
57. In re: Dow Chemical Company vs. Houston Lighting & Power Company, before the Texas Public Utilities Commission, Docket No. 8425, 8431, on behalf of The Dow Chemical Company, concerning application of Houston Lighting & Power Company for authority to change rates; Fuel Reconciliation, Revenue Requirements and Rate Design.
58. Dow Chemical Company vs. Houston Lighting & Power Company, before the Texas Public Utilities Commission, Docket No. 8555, on behalf of The Dow Chemical Company, concerning rate discrimination, cost to serve and class load characteristics.
59. In re: Sierra Pacific Power Company, before the Public Service Commission of Nevada, Docket No. 89-676, on behalf of the Attorney General's Office of Advocate for Customers of Public Utilities, concerning Sierra's system planning.
60. In re: Northern California Power Agency vs. Pacific Gas and Electric Company, before the Federal Energy Regulatory Commission, Docket No. EL89-4-000, on behalf of the Northern California Power Agency ("NCPA"), concerning the Interconnection Agreement between Pacific Gas & Electric Company and NCPA.
61. In re: M-S-R Public Power Agency vs. Tucson Electric Power Company, before the United States District Court of Arizona, No. CIV-86-521-TUC-ACM, on behalf of M-S-R, concerning TEP's breach of contract.
62. In re: Southern California Edison Company and San Diego Gas & Electric Company,

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before the Federal Energy Regulatory Commission, Docket No. EC89-5-000, on behalf of the City of Vernon, California concerning expected effects of the proposed merger on competition, system operation and transmission access.

63. In re: Farmers Electrical Cooperative Corporation and City Water & Light Plant of the City of Jonesboro, Arkansas, v. Arkansas Power & Light Company, No. LR-C-86-118. Presented deposition testimony on AP&L's liability and assisted in settlement negotiations of treble damage claims for transmission line foreclosure made by plaintiffs, City Water and Light Department of Jonesboro, Arkansas and the Farmers Electric Cooperative.
64. In re: Southern California Edison Company and San Diego Gas & Electric Company, before the California Public Utilities Commission, Docket No. 88-12-035, on behalf of the City of Vernon, California concerning expected effects of the proposed merger on competition, system operation and transmission access.
65. In re: Northeast Utilities Service Company and Public Service Company of New Hampshire, before the Federal Energy Regulatory Commission, Docket Nos. EC90-10-000, ER90-143-000, ER90-144-000, ER90-145-000 and EL90-9-000, on behalf of Massachusetts Municipal Wholesale Electric Company, concerning the effect of a proposed merger on competition and transmission access.
66. Report to the Public Utilities Board of Manitoba concerning 1990 Manitoba Hydro Capital Projects Review: Generation and Transmission Requirements. Whitfield Russell Associates was appointed to report to The Public Utilities Board on matters regarding the economic consequences to the domestic customers of the Manitoba Hydro capital program.
67. In re: Northeast Utilities Service Company, before the Federal Energy Regulatory Commission, Docket Nos. ER90-373-000, et al., on behalf of the Massachusetts Municipal Wholesale Electric Company, evaluating the Preferred Transmission Service Agreement between MMWEC and Northeast Utilities Service Company, for the transmission of MMWEC's power purchase from the New York Power Authority.
68. In re: New Hampshire Electric Cooperative Rate Plan Proposal, before the New Hampshire Public Utilities Commission, Docket No. DR90-078, on behalf of the New Hampshire Electric Cooperative, concerning contract valuation.
69. Tampa Electric Company v. Zeigler Coal Company. This was an arbitration held in August 1991, concerning provisions of a coal contract in which Mr. Russell offered testimony for Zeigler to the effect that Tampa Electric was not suffering a hardship by measures commonly used in the electric utility industry.
70. In re: The Long Range Forecast of Ohio Power Company, before the Ohio Public Utilities

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Commission, Docket No. 90-660-EL-FOR (Phase II). Mr. Russell presented and defended testimony on behalf of Ormet Aluminum Corporation concerning Ormet's right to allowances to emit sulfur dioxide from the Kammer Power Plant of Ohio Power Company under the Clean Air Act Amendments of 1990 and the propriety of Ohio Power's Compliance Plan.

71. In re: Application of Tex-La Electric Cooperative to Increase Rates. Mr. Russell presented testimony in 1991, demonstrating that Tex-La was prudent in selling its entitlement in a nuclear plant and in settling its 1988 claims against Texas Utilities concerning Texas Utilities' fraud and imprudence in the construction of the Comanche Peak Nuclear Plant.
72. In re: Southern California Edison Company, before the Federal Energy Regulatory Commission, Docket No. ER88-83, on behalf of the City of Vernon, California concerning expected effects of Edison's administration of its transmission network on competition, system operation and transmission access.
73. In the Matter of the Application of the Public Service Company of New Mexico for Approval to Construct, Own, Operate and Maintain the Ojo Line Extension and for Related Approvals before the New Mexico Public Service Commission, Case No. 2382, on behalf of the United States Department of Energy, concerning transmission line construction programs of the Public Service Company of New Mexico.
74. In re: Wisconsin Public Power Inc. System et al., Advance Plan 6, before the Public Service Commission of the state of Wisconsin, Docket No. 05-EP-6, concerning Eastern Wisconsin Utility Joint Transmission System and Interface Study.
75. In re: MidAtlantic Energy v. Monongahela Power Company and the Potomac Edison Company, before the Public Service Commission of West Virginia, Case No. 89-783-E-C, on behalf of MidAtlantic Energy, concerning need for capacity and the appropriate avoided cost.
76. In re: Northeast Utilities Service Company, before the Federal Energy Regulatory Commission, Docket No. EL91-36-000, on behalf of the Massachusetts Municipal Wholesale Electric Company evaluating the tie-line adjustment charge borne by MMWEC that arose under a Transmission Service Agreement between New England Power Company and Northeast Utilities.
77. In re: Application of Houston Lighting & Power Company for a Certificate of Convenience and Necessity for the DuPont Project, before the Public Utility Commission of Texas, Docket No. 11000, on behalf of Destec Energy, Inc.
78. In re: Investigation on the Commission's Own Motion into Barriers to Contracts Between

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- Electric Utilities and Nonutility Cogenerators and Certain Related Policy Issues, before the Public Service Commission of the state of Wisconsin, Docket No. 05-EI-112, on behalf of JOINT PARTIES: DESTEC Energy, Inc., EnerTran Technology Company, LS Power Corporation, The AES Corporation, LG&E Development Corporation, National Independent Energy Producers, and Citizens' Utility Board, concerning appropriate QF contract provision.
79. In re: Application of Cap Rock Electric Cooperative, Inc. for a Certificate of Convenience and Necessity, before the Public Utility Commission of Texas, Docket No. 11248, on behalf of Cap Rock Electric Cooperative, Inc., concerning its proposed transmission system improvements.
80. In re: Application of Texas Utilities for Authority to Change Rates, before the Public Utility Commission of Texas, Docket No. 11735, on behalf of Cap Rock Electric Cooperative, Inc., concerning standby rates, wholesale rate contracts and terms and conditions of the Power Sales Agreement.
81. In re: Determination of Houston Lighting & Power Company's Standard Avoided Cost Calculation for the Purchase of Firm Energy and Capacity from Qualifying Facilities Pursuant to P.U.C. Subst. R. 23.66(H)(3), before the Public Utility Commission of Texas, Docket No. 10832, on behalf of Destec Energy, Inc.
82. In re: Complaint of Phibro Refining, Inc. v. HL&P, Docket No. 11989, before the Public Utility Commission of Texas, on behalf of Phibro Energy, USA, Inc., concerning electric service contracts and terms and conditions of HL&P's industrial rate schedule.
83. In re: Application of Texas Utilities Electric Company for Authority to Implement Economic Development Service, General Service Competitive Pricing, Wholesale Power Competitive Pricing, and Environmental Technology Service, Docket No. 13100, before the Public Utility Commission of Texas, on behalf of Rayburn Country Electric Cooperative, Inc., concerning TU Electric's so-called "competitive rates."
84. In re: Complaint of Kenneth D. Williams v. HL&P, Docket No. 12065, on behalf of Destec before the Public Utility Commission of Texas.
85. In re: Rebuttal testimony in a Complaint of Tex-La v. TUEC, Docket No. 12362, on behalf of Rayburn County Electric Coop. before the Public Utilities Commission of Texas.
86. In re: Application for Authorization and Approval of Merger Between Wisconsin Electric Power Company, Northern States Power Company (Minnesota), Northern States Power Company (Wisconsin), and Cenergy, Inc., in Docket No. EC-95-16-000, before the Federal Energy Regulatory Commission (on behalf of Certain Intervenors, including Madison Gas



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& Electric Company, Wisconsin Public Service Corporation, Minnesota Power & Light Company, Otter Tail Power Company and the Lincoln Electric System), in Docket Nos. 6630-UM-100 and 4220-UM-101, before the Wisconsin Public Service Commission and Docket No. 6-2500-10601-2 before the Minnesota Office of Administrative Hearings for the Minnesota Public Utilities Commission (both on behalf of Madison Gas & Electric, Wisconsin Industrial Energy Group, Wisconsin Federation of Cooperatives and the Citizen's Utility Board), concerning the effect upon transmission access of the merger of NSP and WEPCO into Primergy.

87. In re: Merger of The Washington Water Power Company and Sierra Pacific Power Company, Docket Nos. EC94-23-000 and ER95-808-000, before the Federal Energy Regulatory Commission, on behalf of Truckee Donner Public Utility District, concerning ancillary services and single system transmission rates.
88. In re: Alberta Electric Utilities 1996 Tariff Application before the Alberta Energy And Utilities Board, on behalf of the Industrial Power Consumers Association of Alberta concerning calculation of charges for ancillary services.
89. In re: Surrebuttal Testimony in Docket Nos. EC95-16-000, ER95-1357-000 and ER95-1358-000, on behalf of Madison Gas & Electric Company, Citizens Utility Board and Wisconsin Electric Cooperative Association.
90. In re: City Public Service Board of San Antonio Filing in Compliance with Subst. Rule 23.67, Docket No. 15613, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
91. In re: City of Austin Filing in Compliance with Subst. Rule 23.67, Docket No. 15645, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
92. In re: Central Power and Light and West Texas Utilities Filing in Compliance with Subst. Rule 23.67, Docket No. 15643, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
93. In re: Texas Utilities Electric Company, Filing in Compliance with Subst. Rule 23.67, Docket No. 15638, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.

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94. In re: Docket No. 15840, Regional Transmission Proceeding to Establish Postage Stamp Rate and Statewide Load Flow Pursuant to P.U.C. Subst. Rule. 23.67 on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
95. In re: Application of Wisconsin Energy Corporation, Wisconsin Electric Power Company, Northern, States Power Company, and Northern States Power Company-Wisconsin for Approval of a Series of Transactions by Which Northern States Power Company-Wisconsin is merged into Wisconsin Electric Power Company, Northern States Power Company becomes a Subsidiary of Wisconsin Energy Corporation, and Wisconsin Energy Corporation is Renamed Primergy Corporation: Direct Testimony, Rebuttal Testimony and Surrebuttal Testimony on behalf of The Wisconsin Industrial Energy Group (“WIEG”), The Citizens’ Utility Board (“CUB”), The Wisconsin Federation of Cooperatives (“WFC”) and Madison Gas and Electric (“MG&E”) in Docket Nos. 6630-UM-100 and 4220-UM-101 before the Public Service Commission of Wisconsin. The purpose of the direct testimony was to address Certain Intervenors’ Transmission System Control Agreement and ISO Bylaws; October 8, 1996. The purpose of the rebuttal testimony was to address Applicants’ Unilateral Settlement Offer which was submitted to FERC in their FERC merger proceeding; October 24, 1996. The purpose of the surrebuttal testimony was to address two sets of Rebuttal testimony of Jose Delgado and the Rebuttal Testimonies of Malcolm Bertsch of the Applicants and Don Carlson of Minnesota Power and Light; November 5, 1996.
- 95a. In re: In the Matter of Northern States Power Company’s Petition for Approval to Merge with Wisconsin Energy Corporation; OAH Docket No. 6-2500-10601-2: Direct Testimony and Exhibits and Rebuttal Testimony and Exhibits on behalf of Madison Gas and Electric (“MG&E”), The Wisconsin Federation of Cooperatives (“WFC”), and The Citizens’ Utility Board (“CUB”) in Docket No. E,G-002 and PA-95-500 before the Minnesota Office of Administrative Hearings for the Minnesota Public Utilities Commission. The purpose of the direct testimony is to remedy a Wisconsin Energy Corporation merger, in order to prevent anti-competitive effects with an Independent System Operation which actually operates the transmission system and which is truly independent of the proposed Primergy; October 21, 1996. The purpose of the rebuttal testimony is to address the direct testimony of Dr. Eilon Amit of Minnesota Department of Public Service and Dan Carlson of Minnesota Power and Light; November 8, 1996.
- 95b. In re: Joint Application of WPL Holdings, Inc. and Wisconsin Power & Light Company for all Requisite Approvals in Connection with a Series of Related Transactions by which Interstate Power Company Becomes a Subsidiary of WPL Holdings, Inc., IES Industries, Inc. is Merged into WPL Holdings, Inc. and is Renamed Interstate Power Corporation and for Certain Related Transactions and Matters:

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Direct Testimony and two Surrebuttal Testimonies on behalf of Badger Cooperative Group (“BCG”), The Citizens’ Utility Board (“CUB”), Madison Gas and Electric (“MG&E”), The Wisconsin Federation of Cooperatives (“WFC”), Wisconsin Industrial Energy Group (“WIEG”) and Municipal Wholesale Power Group (“MWPG”) in Docket No. 6680-UM-100 before the Public Service Commission of Wisconsin. The purpose of the direct testimony was to discuss the characteristics of an appropriate ISO and present the ISO recommended by Certain Intervenors; May 7, 1997. The purpose of surrebuttal testimony #1 was to answer the rebuttal testimony of WP&L’s witness Rodney Frame, Arnold Kehrlı and Scott Wallace; May 30, 1997. The purpose of surrebuttal testimony #2 was to address the rebuttal testimony of WP&L’s witness Arnold Kehrlı; May 30, 1997.

96. In re: Houston Lighting & Power Company Filing in Compliance with Subst. Rule 23.67, Docket No. 15639, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas; September 30, 1996.
97. In re: IES Utilities, Inc., Interstate Power Company, Wisconsin Power & Light Company, South Beloit Water, Gas & Electric Company, Heartland Energy Services, and Industrial Energy Applications, Inc., Docket Nos. EC96-13-000, ER96-1236-000, and ER96-2560-000, before the Federal Energy Regulatory Commission, on behalf of Wisconsin Intervenors ("WI"). Mr. Russell simultaneously filed 2 sets of testimony; the first, sponsored by the intervenors listed above as well as by Wisconsin Public Service Corporation ("Pub Service"), and Dairyland Power Cooperative. ("Dairyland") analyzed engineering and operating problems created by the merger of WP&L, IPW and IES. The second set of testimony discusses how the IEC Independent System Operator ("ISO") fails in general to meet the rigorous and comprehensive ISO standards promulgated by the Wisconsin Public Service Commission (WPSC). Both sets of testimony (Engineering and ISO) were filed before the Federal Energy Commission; March 27, 1997.
98. In re: Joint Application of WPL Holdings, Inc. and Wisconsin Power & Light Company for all Requisite Approvals in Connection with a Series of Related Transactions by which Interstate Power Company Becomes a Subsidiary of WPL Holdings, Inc., IES Industries, Inc. is Merged into WPL Holdings, Inc. and is Renamed Interstate Power Corporation and for Certain Related Transactions and Matters, in Docket No. 6680-UM-100, before the Public Service Commission of Wisconsin; May 7, 1997.
99. In re: City of College Station, FERC Docket No. TX 96-2-000, concerning transmission rates; November 7, 1997.

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100. In re: Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code, in Docket No. R-00973981 on behalf of Mid-Atlantic Power Supply Association, before the Pennsylvania Public Utility Commission; November 7, 1997.
101. In re: Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code, in Docket No. R-00974104 on behalf of Mid-Atlantic Power Supply Association, before the Pennsylvania Public Utility Commission; November 7, 1997.
102. In re: New England Power Company, FERC Docket No. OA96-74-000, concerning proposed formula rates for Tariffs No. 9 and 4, on behalf of the Massachusetts Municipals; December 12, 1997.
103. In re: Sierra Pacific Power Company before the Federal Energy Regulatory Commission in Docket Nos. ER97-3593-000, ER97-3779-000, ER97-4462-000 on behalf of Truckee Donner Public Utility District, addressing lack of comparable access to transmission systems; February 23, 1998.
104. In re: Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code, on behalf of Newmont Gold Company and Barrick Goldstrike Mines, in Docket Nos. 97-11018 and 97-11028, before the Public Service Commission of Nevada; February 1, 1998.
105. In re: Southern California Edison Company before the Federal Energy Regulatory Commission in Docket No. ER97-2355-000 on behalf of Department of Water Resources of the State of California, regarding lower pricing for off-peak transmission services; April 1998.
106. In re: Response to Procedural Order Number Three Load Pockets, on behalf of Newmont Gold Company and Barrick Goldstrike Mines, Docket Number 97-8001, before the Public Utilities Commission of Nevada; May 15, 1998.
107. In re: Supplemental Testimony in an Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code, on behalf of Newmont Gold Company and Barrick Goldstrike Mines, Docket Numbers 97-11018 and 97-11028, before the Public Utilities Commission of Nevada, May 22, 1998.
108. In re: Southern California Edison Company, on behalf of The Department of Water Resources of The State of California, Docket No. ER97-2355, before FERC in reference to Transmission Revenue Balancing Account Adjustment ("TRBAA"); November 16, 1998.
109. In re: Ormet Primary Aluminum Corporation, on behalf of Ormet Primary Aluminum Corporation, Arbitration Number 55-199-0051-94, before the American Arbitration

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Association, concerning the relationship between AEP and other power systems within NERC and ECAR; July 14 1998.

110. In re: Rebuttal Testimony in response to Mr., Walter R. Kelley and Mr. Thomas Kennedy, on behalf of Ormet Primary Aluminum Corporation, Arbitration Number 55-199-0051-94, before the American Arbitration Association; September 2, 1998.
111. In re: Application No. RE95081 – TransAlta Utilities Corp., on behalf of Albchem Industries Ltd., CXY Chemicals and Dow Chemicals Canada Ltd., before the Alberta Energy & Utilities Board addressing ACD’s interest in providing interruptible service; October 1998.
112. In re: Tri-State Generation and Transmission Assoc., Inc., in Arbitration No. 77 Y 181 0023097 before the American Arbitration Association; September 14, 1998.
113. In re: Joint Application for Approval of Merger, Docket No. 98-7023 on behalf of The Staff of the Public Utilities Commission, before the Public Utilities Commission of Nevada; November 9, 1998.
114. In re: Independent System Administrator, Docket No. 97-8001 on behalf of The Staff of the Public Utilities Commission, before the Public Utilities Commission of Nevada; December 11, 1998.
115. In re: Petition for Order Concerning Delineation of Transmission and Local Distribution Facilities, Docket No. 98-0894 on behalf of The City of Chicago, before the Illinois Commission in reference to re-functionalization; April 2, 1999.
116. In re: Consolidated Edison Company, Docket No. EL99-58-000 on behalf of The Village of Freeport, New York, before FERC in reference to remedies for the breach of contract to provide firm service on a non-discriminatory basis; July 22, 1999, August 3, 1999, August 18, 1999 and September 9, 1999.
117. In re: Wisconsin Public Power, Inc. Docket No. 05-EI-119 on behalf of Wisconsin Transmission Customer Group (WTTCG"), before the Public Service Commission of Wisconsin to address the concerns of municipally-owned utilities within Wisconsin; March 6, 2000.
118. In re: Joint Application of Utilicorp United Inc. & St. Joseph Light & Power Co., Docket No. EM-2000-292 on behalf of Springfield (MO) City Utilities before the PSC of the State of Missouri to address why the merger between the two is detrimental to the public interest; May 1, 2000.

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119. In re: Utilicorp United Inc, and Empire District Electric Co. Docket No. EM-2000-369 on behalf of Springfield (MO) City Utilities before the Public Service Commission of the State of Missouri to explain why the merger between the two is detrimental to the public interest; June 19, 2000.
120. In re: Arrowhead - Westin Transmission Line Project, Docket No. 05-CE-113 on behalf of the Wisconsin Public Service Corporation (“WPSC”), before the Public Service Commission of the State of Wisconsin to provide support for the transmission project as proposed by WPSC and Minnesota Power; November 22, 2000.
121. In re: Kansas Municipal Energy Agency (“KMEA”), Docket No. ER00-2644-000 on behalf of the Kansas Municipal Energy Agency (“Kansas Municipal”), before the Federal Energy Regulatory Commission (“FERC”) to review, assess and comment on the actions taken by the Southwest Power Pool in connection with two transmission service requests made by the Kansas Municipal Energy Agency aggregating 39 MW of contract demand; December 8, 2000.
122. In re: Arrowhead - Weston 345 kV Transmission Line, Rebuttal testimony in Docket No. 05-CE-113 on behalf of the Wisconsin Public Service Corporation (“WPSC”), before the Public Service Commission of the State of Wisconsin to address matters set forth in the direct testimony of Dr. Richard A. Rosen on behalf of Save Our Unique Lands (“SOUL”), Mr. David Schoengold on behalf of Wisconsin's Environmental Decade, and Mr. George R. Edgar on behalf of the Citizens' Utility Board (“CUB”); December 18, 2000.
123. In re: Ethyl Corporation verses Gulf States Utilities Company, Civil Docket No. M, live direct testimony in a dispute over direct assignment of substation facilities; April 2001.
124. In re: Joint Application of Entergy Louisiana, Inc. and Entergy Gulf States, Inc., Docket No. U-25533 on behalf of Occidental Chemical Corporation (“OxyChem”), before the Louisiana Public Service Commission for authorization to participate in contracts for the purchase of capacity and electric power for the Summer of 2001; May 3, 2001.
125. In re: Petitioners' Joint Proposal for Merger & Rate Plan, testimony in Case No. 01-M-0075 on behalf of Alliance for Municipal Power before the New York State Public Service Commission. The purpose of this testimony is explain (1) the inappropriateness of Rule 52 in the post merger competitive energy markets; (2) to have stranded transmission cost and distribution costs expunged; and (3) to show how merged Companies exacerbates the incentive to abuse Rule 52 against newly formed municipal utilities; November 5, 2001.
126. In re: Northeast Utilities Service Company Transmission Line Project, direct testimony in Docket No, 217 before the Connecticut Siting Council of the State of Connecticut on behalf

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of the Attorney General, State of Connecticut for the purpose of (1) Whether there is a need for the 345 f transmission line from Plum-tree to Norwalk; (2) whether the proposed transmission system design is the best option based on current transmission design and (3) whether any approval of the project by the Siting Council should be conditioned upon CL&P and NU's agreement; March 12, 2002.

127. In re: Alliance Companies, et al., Affidavit in Docket Nos. RM01-12-000, RT01-87-000 and RT01-88-000, before the Federal Energy Regulatory Commission on behalf of the Ormet Primary Aluminum Corporation, for the purpose of providing relevant engineering fundamentals related to the proper design of methodology for quantifying transmission losses and for allocating such losses to the customers of regional transmission organizations; March 12, 2002.
128. In re Cannon Power Corporation., Affidavit in Docket No. ER02-2189-000, before the Federal Energy Regulatory Commission on behalf of Whitewater Hill Wind Partners, LLC developing a 66 MW wind power project to be interconnected to Southern California Edison Company; July 29, 2002.
129. In re Cannon Power Corporation., Affidavit in Docket No. ER02-1764, before the Federal Energy Regulatory Commission on behalf of Cabazon Wind Partners, LLC developing a 66 MW wind power project to be interconnected to Southern California Edison Company; August 2, 2002.
130. In re: Response to Pacificorp's Motion: Affidavit in Response to Pacificorp's Daubert Motion Regarding Richard Slaughter and Supplemental Expert Report on behalf of Snake River Valley Electric Association; September 10, 2002.
131. In re: Pacific Gas & Electric Company : Direct Testimony in Docket No. ER01-2998, before the Federal Energy Regulatory Commission on behalf of Northern California Power Agency to explain what level of firmness is required of transmission service under the Stanislaus Commitments; December 20, 2002.
132. In re: American Electric Power Corp.: Affidavit in Docket No. ER03-242, before the Federal Energy Regulatory Commission on behalf of Ormet Primary Aluminum Corp. to respond to AEP's proposed electric transmission rates to be included in the OATT of the PJM Interconnection; December 24, 2002.
133. In re: Application of the CT Light & Power Company: Supplemental Direct Testimony in Docket No. 217, before the State of CT Siting Council on behalf of The Attorney General, State of CT as a follow-up to the direct testimony filed on March 12, 2002 and to address various studies and reports that had been filed since that original testimony; January 14, 2003.

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134. In re: Pacific Gas & Electric: Rebuttal Testimony before the Federal Energy Regulatory Commission in Docket No. ER01-2998 on behalf of Northern California Power Agency ("NCPA") to respond to testimony from witnesses Judi K. Mosley, Kevin J. Dasso, Dr. Roy Shanker and Linda Patterson; April 1, 2003.
135. In re: Order Instituting Investigation into implementation of Assembly Bill 970 regarding the identification of electric transmission and distribution constraints, actions to resolve those constraints, and related matters affecting the reliability of electric supply: Direct testimony before the Public Utilities Commission of California on behalf of Oak Creek Energy Systems. The purpose of the testimony was to provide comments on and recommendations with respect to the Tehachapi Transmission Conceptual Facility Study ("Tehachapi CFS" or "TCFS"), performed by Southern California Edison ("SCE" or "Edison"); April 22, 2003.
136. In re: Order Instituting Investigation into implementation of Assembly Bill 970 regarding the identification of electric transmission and distribution constraints, actions to resolve those constraints, and related matters affecting the reliability of electric supply: Rebuttal testimony before the Public Utilities Commission of California on behalf of Oak Creek Energy Systems. The purpose of the testimony was to rebut the testimony of Mr. Jorge Chacon and Mr. Melvin Stark on behalf of Southern California Edison Company, taking into account the testimony of Mr. Robert Sparks filed on behalf of the California Independent System Operator ("CA ISO" or "ISO"); May 13, 2003.
137. In re: California Independent System Operator Corporation: Direct testimony before the Federal Energy Regulatory Commission in Docket No. ER00-2019 on behalf of State Water Contractors and the Metropolitan Water District of Southern California. The purpose of the testimony was to provide a critical analysis of ISO's proposed Transmission Access Charge; June 2, 2003.
138. In re: Ameren Services Company, et al.: Affidavit in Docket No. EL03-212-000, before the Federal Energy Regulatory Commission on behalf of Ormet Primary Aluminum Corp. to respond to AEP's Submission in Response to the Commission's Section 206 Investigation; September 2, 2003.
139. In re: Pacific Gas and Electric Company: Direct Testimony in Phase I before the Federal Energy Regulatory Commission in Docket Nos. ER00-565-000, ER00-565-003, and ER00-565-007 on behalf of the Northern California Power Agency. The purpose of the testimony was to explain the nature of the costs for which Pacific Gas and Electric Company seeks recovery through its Scheduling Coordinator Service Tariff; September 15, 2003.
140. In re: California Independent System Operator Corporation: Surrebuttal Testimony before



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the Federal Energy Regulatory Commission in Docket Nos. ER00-2019-006, ER01-819-002, and ER03-608-000 on behalf of State Water Contractors and the Metropolitan Water District of Southern California. The purpose of the testimony was to respond to the Prepared Rebuttal Testimony of Mr. Johannes P. Pfeifenberger on behalf of the ISO; October 20, 2003.

141. In re: Midwest Independent Transmission System Operator, Inc. and Public Utilities With Grandfathered Agreements in the Midwest ISO Region: Prepared Testimony before the Federal Energy Regulatory Commission in Docket Nos. ER04-691-000 and EL04-104-000 on behalf of Marshfield Electric & Water District. The purpose of the testimony was to review Marshfield Electric & Water District's transmission arrangements in order to respond to the Commission's May 26, 2004 Order in this proceeding; June 25, 2004.
142. In re: Pacific Gas and Electric Company: Direct Testimony in Phase II before the Federal Energy Regulatory Commission in Docket Nos. ER00-565-000 and ER00-565-003 on behalf of the Northern California Power Agency ("NCPA"). The testimony addressed the propriety of PG&E's passing through ISO Charge Type costs as Scheduling Coordinator Service charges to NCPA under the terms of the NCPA-PG&E Interconnection Agreement; September 13, 2004.
143. In re: Southern California Edison Company: Prepared Direct Testimony before the Federal Energy Regulatory Commission in Docket No. ER02-2189-003 on behalf of Whitewater Wind Hill Partners. The purpose of the testimony was to provide support for Whitewater's request that the Commission revise the Interconnection Facilities Agreement ("IFA") between Whitewater and Southern California Edison Company ("SCE or Edison"); September 14, 2004.
144. In re: Cabazon Wind Partners, LLC Complainant vs. Southern California Edison Company Respondent: Affidavit in Docket No. EL04-137 before the Federal Energy Regulatory Commission on behalf of Cabazon Wind Partners, LLC ("Cabazon"). This Affidavit provides support for Cabazon's request that Southern California Edison Company ("SCE") grant Cabazon reimbursement, in the form of a transmission credit or otherwise, for the cost of certain upgrades Cabazon has borne to interconnect its generation to SCE; September 27, 2004.
145. In re: Southern California Edison Company: Cross Answering Testimony before the Federal Energy Regulatory Commission in Docket No. ER02-2189-003 on behalf of Whitewater Hill Wind Partners. The purpose of the testimony was to respond to testimony filed on October 28, 2004, in this proceeding by Commission Staff witnesses, Ms. Tania Martinez Navedo and Mr. Edward W. Mills with respect to the designation of disputed upgrades contained in the IFA between Whitewater and Southern California Edison Company; November 22, 2004.

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146. In re: Pacific Gas and Electric Company: Direct and Answering Testimony before the Federal Energy Regulatory Commission in Docket No. ER01-1639-006 on behalf of Northern California Power Agency. The purpose of this testimony was to explain 1) PG&E's failure to justify the pass-through of Reliability Service charges to the Western Area Power Administration and PG&E's additional failure to "unbundle the rates in its ETCs and provide a full cost of service analysis supporting the unbundled rates," 2) PG&E's attempt to pass-through Scheduling Coordinator Service Charges to Western, and 3) the inappropriateness of PG&E's imposition of interest charges; November 23, 2004.
147. In re: Petition for a Declaratory Order or Advisory Opinion as to the Applicability of the Commission's Decision in Docket No. 03-10003, Plant Project in Orange County, California: Affidavit in Docket No. 04-10023, before the Public Utilities Commission of Nevada on behalf of Ridgewood Renewable Power, LLC ("Ridgewood") with respect to a landfill methane gas powered electric generating project located at the Olinda/ Alpha landfill in Orange County, California; December 30, 2004.
148. In re: Southern California Edison Company and Cabazon Wind Partners, LLC: Prepared Direct Testimony before the Federal Energy Regulatory Commission in Docket No. EL04-137, on behalf of Cabazon Wind Partners, LLC. The purpose of this testimony was to provide support for Cabazon's request that Southern California Edison ("SCE") grant Cabazon reimbursement, in the form of transmission credit or otherwise, for the cost of certain upgrades Cabazon had borne to interconnect generation to SCE; February 4, 2005.
149. In re: Pacific Gas and Electric Company: Phase II Answering Testimony to PG&E's Supplemental Testimony; Cross Answering Testimony; and Errata of Whitfield A. Russell before the Federal Energy Regulatory Commission in Docket No. ER00-565-000, et al and ER04-1233-000, on behalf of Northern California Power Agency. The purpose of this testimony was to respond to PG&E's contention that the SCS Tariff is a formula rate, to respond to aspects of the Prepared Direct and Answering Testimony of Ms. Linda M. Patterson on behalf of the Federal Energy Regulatory Commission Staff.
150. In re: Southern California Edison Company: Affidavit before the Federal Energy Regulatory Commission in Docket No. EL05-80-000, on behalf of the California Wind Energy Association ("CalWEA"). The purpose of this affidavit was to explain how and why the proposed Antelope-Tehachapi 230 kV line would be integrated into the regional transmission grid and thereby constitute a network upgrade facility; April 14, 2005.
151. In re: American Electric Power Service Corporation: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER05-751-000, on behalf of Ormet Primary Aluminum Corporation. The purpose of this affidavit was to respond to

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American Electric Power Corporation's (AEP's) request (a) to increase its annual Network Integration Transmission Service (NTS) revenue requirements to \$486 million per year and (b) to increase the NTS rates; April 29, 2005.

152. In re: Southern California Edison Company and Cabazon Wind Partners, LLC: Prepared Rebuttal Testimony before the Federal Energy Regulatory Commission in Docket No. EL04-137, on behalf of Cabazon Wind Partners, LLC. The purpose of this testimony was to respond to direct testimony filed on March 14, 2005 and cross answering testimony filed by Southern California Edison and Commission Staff witness, Ms. Emily White; May 20, 2005.
153. In re: In the Matter of the Arbitrations between PG&E Energy Trading-Power, LP Claimant, Counter-Respondent and Southaven Power, LLC, and Caledonia Generating, LLC, Respondents, Counter-Claimants: Expert Report and litigation before the American Arbitration Association in AAA Nos. 16-198-00206-03 & 16-198-00207-03, on behalf of Williams & Connolly LLP (counsel of Southaven Power, LLC) and Bingham McCutchen LLP (counsel for Caledonia Generating, LLC). The purpose of this expert report was to provide my opinion on certain elements of the matters in dispute between PG&E Energy Trading-Power, L.P., on the one hand, and each of Southaven and Caledonia, on the other hand. These disputes arose in connection with two similar tolling agreements, each titled "Dependable Capacity and Conversion Services Agreement;" September 8, 2005.
154. In re: Midwest Independent Transmission System Operator, Inc: Pre-Filed Answering Testimony before the Federal Energy Regulatory Commission in Docket No. ER05-6-001, et al, on behalf of Ormet Primary Aluminum Corporation. This testimony addressed the proposed SECA rate design as it related to Ormet; October 24, 2005.
155. In re: Berkshire Power Company, LLC: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER05-1179-001, on behalf of Massachusetts Municipal Wholesale Electric Company, Chicopee Municipal Lighting Plant, and South Hadley Electric Light Department. This affidavit addressed the engineering analysis performed by ISO New England in support of its determination of the system reliability for the Springfield, Massachusetts area in Western Massachusetts; November 7, 2005.
156. In re: Consolidated Edison Energy Massachusetts, Inc.: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER05-903-002, on behalf of Massachusetts Municipal Wholesale Electric Company, Chicopee Municipal Lighting Plant, and South Hadley Electric Light Department. This affidavit addressed the engineering analysis performed by ISO New England in support of its determination of system reliability for the Springfield, Massachusetts area in Western Massachusetts and need for two generating units in that area: (1) the 245 MW Berkshire facility operated by Berkshire Power Company; and (2) the 107 MW West Springfield Unit 3 operated by

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Consolidated Edison Energy Massachusetts, Inc.; November 10, 2005.

157. In re: Pittsfield Generating Company, LP: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER06-262-000, on behalf of Massachusetts Municipal Wholesale Electric Company, Chicopee Municipal Lighting Plant, and South Hadley Electric Light Department. This affidavit reviewed the engineering analysis performed by ISO New England in support of its evaluation of the system reliability for the Pittsfield, Massachusetts area of Western Massachusetts and need for the 160 MW facility operated by Pittsfield Generating Company, L.P.; December 21, 2005.
158. In re: Mystic Development LLC: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER06-427-000, on behalf of Massachusetts Municipal Wholesale Electric Company, Wellesley Municipal Light Plant, Reading Municipal Light Department and Concord Municipal Light Plant. This affidavit (a) responded to portions of the testimony offered by Mystic witnesses; and (b) reviewed the December 7, 2004, engineering analysis “Need for Mystic Units 7, 8 and 9 for System Reliability,” performed by ISO New England (“ISO”); January 19, 2006.
159. In re: In the Matter of the Application of Ohio Power Company for Approval of a Special Contract Arrangement with Ormet Primary Aluminum Corporation, In the Matter of the Joint Petition of Ohio Power Company and South Central Power Company for Reallocation of Territory, In the Matter of: Ormet Primary Aluminum Corporation and Ormet Primary Mill Products Corporation v. South Central Power Company and Ohio Power Company: Pre-Filed Testimony before the Public Utilities Commission of Ohio in Docket Nos. 96-999-EL-AEC, 96-1000-EL-PEB and 05-1057-EL-CSS, on behalf of Ormet Primary Aluminum Corporation. This testimony analyzed: (a) the effect upon the other ratepayers of South Central and Buckeye of requiring South Central to serve Ormet and (b) the effect upon other ratepayers and stockholders of Ohio Power Company (“OPCO”) of requiring OPCO to serve Ormet’s full requirements under OPCO’s retail GS-4 rate schedule; September 8, 2006.
160. In re: Mystic Development, LLC: Direct Testimony before the Federal Energy Regulatory Commission in Docket No. ER06-427-000, on behalf of Massachusetts Municipal Wholesale Electric Company, Reading Municipal Light Department Wellesley Municipal Light Plant and Concord Municipal Light Plant. This testimony assessed whether a cost-of-service (“COS”), Reliability Must-Run (“RMR”) Agreement was needed in order to keep Mystic Development LLC’s (“Mystic’s”) Units 8 and 9 available to provide reliability service and a just and reasonable COS rate to be imposed on customers under the RMR agreement. November 9, 2006.
161. In re: Hydroelectric Production Rates and Rate Modification Plan-2007 and 2008 Rate Years: Direct Testimony and Supporting Exhibits before the New York Power Authority,

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on behalf of the New York Association of Public Power. This testimony addressed the understatement of capacity at the Niagara and St. Lawrence Projects of the New York Power Authority (“NYPA”) and how that understatement of capacity improperly reduces the amount of capacity made available to preference customers of the Niagara Project and improperly increases the rates applicable to capacity sold to those customers; April 9, 2007.

162. In re: ISO New England Inc: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER08-190-000, on behalf of Massachusetts Municipal Wholesale Electric Company (“MMWEC”). This testimony reviewed the engineering analysis performed by ISO New England Inc. in support of its determination that MMWEC’s Phase II Stony Brook Unit is not qualified to participate in the first Forward Capacity Market auction, then scheduled to be held in February 2008; November 21, 2007.
163. In re: Columbus Southern Power Company and Ohio Power Company: Affidavit before the Public Utilities Commission of Ohio in Case Nos. 07-1132-EL-UNC, 07-1191-EL-UNC, 07-1278-EL-UNC, and 07-1156-EL-UNC, on behalf of Ormet Primary Aluminum Company. This affidavit addressed the Application of Columbus Southern Power Company and Ohio Power Company for approval of an additional generation service rate increase pursuant to their post-market development period rate stabilization plans and to update each company’s transmission cost recovery rider; February 28, 2008.
164. In re: Niagara Mohawk Power Corporation: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER08-552-000, on behalf of the New York Association of Public Power and several of its members which include Green Island Power Authority, Jamestown Board of Public Utilities, City of Salamanca Board of Public Utilities, City of Sherrill Power & Light and Oneida-Madison Electric Cooperative, Inc. This affidavit reviewed the filing by NMPC for Amendments to its Wholesale Transmission Service Charge for Point-to-Point Transmission service and Network Integration Transmission Service; March 17, 2008.
165. In re: Braintree Electric Light Department, Hingham Municipal Lighting Plant, Hull Municipal Lighting Plant, Mansfield Municipal Electric Department, Middleborough Gas and Electric Department and Taunton Municipal Light Plant v. ISO New England Inc.: Direct Testimony and Exhibits before the Federal Energy Regulatory Commission in Docket No. EL08-48, on behalf of the individually municipally-owned power systems serving the Massachusetts communities of Hull, Mansfield, Middleborough, Taunton, Braintree and Hingham. This testimony provided technical support for the MPS complaint; March 28, 2008.
166. In re: Entergy Nuclear Operations Inc. and Entergy Nuclear Palisades, Inc. (Palisades

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- Nuclear Plant), Entergy Nuclear Operations Inc. and Entergy Nuclear Fitzpatrick, Inc. (James A. Fitzpatrick Nuclear Power Plant), Entergy Nuclear Operations Inc. and Entergy Nuclear Generation Company (Pilgrim Nuclear Power Station), Entergy Nuclear Operations Inc. and Entergy Nuclear Vermont Yankee, Inc. (Vermont Yankee Nuclear Power Station), Entergy Nuclear Operations Inc.; Entergy Nuclear Indian Point 2, LLC; and Entergy Nuclear Indian Point 3, LLC (Indian Point Nuclear Generating Units Nos. 1, 2, and 3), and Entergy Nuclear Operations Inc. and Entergy Nuclear Palisades, LLC. (Big Rock Point): Affidavit before the Nuclear Regulatory Commission in Docket Nos. 50-255-LT and 72-7-LT, 50-333-LT and 72-12-LT, 50-293-LT, 50-271-LT, 50-003-LT, 50-247-LT and 50-286-LT and 50-155-LT and 72-43-LT, on behalf of the Locals 369 and 590, Utility Workers Union of America, AFL-CIO. This affidavit provided support for the April 15, 2008, Reply of Locals 369 and 590, Utility Workers Union of America, AFL-CIO opposing a restructuring of Entergy's nuclear operating companies; April 15, 2008.
167. In re: ISO New England, Inc.: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER08-633-000, on behalf of The Connecticut Department of Public Utility Control. The purpose of this affidavit was to review the reliability analyses performed by the ISONE on the need to retain NRG's Norwalk Harbor Units 1 and 2 as listed Capacity Resources in the Forward Capacity Market for the 2010/2011 Capacity Year; April 17, 2008.
168. In re: In the Matter of the Ontario Energy Board Act, 1998, S.O. 1998, C.15 (Sched. B); In the Matter of an Application by Hydro One Networks Inc. pursuant to section 92 of the Act, for an Order or Orders granting leave to construct a transmission reinforcement project between the Bruce Power Facility and Milton switching Station, all in the Province of Ontario: Affidavit and Exhibits before the Ontario Energy Board in Docket No. EB-2007-0050, on behalf of the Saugeen Ojibway Nations. The purpose of this affidavit was to review the analyses performed by the Ontario Power Authority, Hydro One and the Independent Electric System Operator of Ontario in support of the application to construct a proposed Bruce-to-Milton double circuit 500 kV transmission line project; April 18, 2008.
169. In re: Braintree Electric Light Department, Hingham Municipal Lighting Plant, Hull Municipal Lighting Plant, Mansfield Municipal Electric Department, Middleborough Gas and Electric Department and Taunton Municipal Light Plant v. ISO New England Inc.: Second Affidavit before the Federal Energy Regulatory Commission in Docket No. EL08-48-000, on behalf of the individual municipally owned power systems serving the Massachusetts communities of Hull, Mansfield, Middleborough, Taunton, Braintree and Hingham.

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170. In re: In the Matter of sections 25.30 and 25.31 of the Electricity Act and In the Matter of an Application by Ontario Power Authority for review and approval of its integrated power system plan and approval of its proposed procurement process. Affidavit and Exhibits before the Ontario Energy Board in Docket No. EB-2007-0707, on behalf of the Saugeen Ojibway Nations. The purpose of this affidavit was to review the Integrated Power System Plan (“IPSP”) prepared by the Ontario Power Authority, and discuss that Plan as it relates to the concerns of the Saugeen Objiway Nations; Filed August 1, 2008.
171. In re: Ashburnham Municipal Light Plant, Boylston Municipal Light Department, Chester Municipal Electric Light Department, Groton Electric Light, Holden Municipal Light Department, Holyoke Gas & Electric Department, Paxton Municipal Light Department, Princeton Municipal Light Department, Shrewsbury Electric Light and Cable, Sterling Municipal Light Department, Templeton Municipal Light, West Boylston Municipal Light Plant, Westfield Gas & Electric, Chicopee Municipal Lighting Plant, Hudson Light & Power Department, South Hadley Electric Light Department and the Massachusetts Municipal Wholesale Electric Company, Complainants, v. Berkshire Power Company, LLC, and ISO New England Inc., Respondents. Affidavit and Exhibits before the Federal Energy Regulatory Commission in Docket No. EL08-, on behalf of Ashburnham Municipal Light Plant, et al. The purpose of this affidavit is to present the results of an analysis I conducted concerning whether Berkshire Power Company, LLC (“Berkshire”), the operator of the Massachusetts-based Berkshire Plant, is earning sufficient revenues in the market to cover its “facility costs.” The Berkshire Unit is currently operated pursuant to a Reliability Must Run (“RMR”) Agreement between Berkshire and ISO New England Inc.
172. In re: Missouri River Energy Services and Midwest Independent Transmission System Operator, Inc. and Missouri River Energy Services and Western Minnesota Municipal Power Agency. Rebuttal Testimony before the Federal Energy Regulatory Commission in Docket No. ER08-370-008 and EL08-22-006, on behalf of Missouri River Energy Services and the Western Minnesota Municipal Power Agency. The main purpose of my testimony was to respond to portions of Mr. Alan Heintz’s Prefiled Answering Testimony, Cross Answering Testimony and Corrections to Testimony on behalf of Otter Tail Power Company (“OTP”) and of Mr. Lotfy N. Sidrak’s Prepared Answering Testimony on behalf of the Commission Staff; Filed October 9, 2009.
173. In re: Southwest Power Pool, Inc. Affidavit before the Federal Energy Regulatory Commission in Docket No. ER10-1069-000 on behalf of Nebraska Public Power District, Omaha Public Power District, City Utilities of Springfield, Missouri, Lincoln Electric System and The Empire District Electric Company. The purpose of this affidavit is respond to Southwest Power Pool, Inc.’s “Submission of Tariff Revisions to Modify Transmission Cost Allocation Methodology,” and, in particular, the Prepared Direct Testimony of Mr. Leslie E. Dillahunty; Filed May 17, 2010.

**Proceedings In Which  
Whitfield A. Russell  
Has Testified**

174. In re: Southwest Power Pool, Inc. Affidavit before the Federal Energy Regulatory Commission in Docket No. ER10-1269-000 on behalf of Nebraska Public Power District. The purpose of this affidavit is to respond to SPP's Integrated Transmission Plan filing in Docket No. ER10-1269 on May 17, 2010 and the prepared testimony of Mr. Bruce Rew, which summarizes and purports to provide a justification for SPP's modified transmission planning process, the Integrated Transmission Plan ("ITP"); Filed June 7, 2010.
175. In re: In the Matter of the Application of Rocky Mountain Power for Alternative Cost Recovery for Major Plant Additions of the Populus to Ben Lomond Transmission Line and the Dunlap 1 Wind Project. Testimony before the Public Service Commission of Utah in Docket No. 10-035-89 on behalf of The Utah Industrial Energy Consumers. The purpose of this testimony is to explain Why present method of allocating costs of PacifiCorp's transmission system should be changed to a method that tracks cost causation and is aligned with PacifiCorp's transmission planning; Filed October 26, 2010.
176. In re: The Connecticut Light and Power Company, The Connecticut Transmission Municipal Electric Energy Cooperative. Affidavit before the Federal Energy Regulatory Commission in Docket No. EC11-31 on behalf of the Connecticut Transmission Municipal Electric Energy Cooperative. The purpose of this affidavit is to explain how CTMEEC intends to account for, and recover the transmission revenue requirement associated with, the 345 k V and 115 k V PTF assets that it is acquiring from CL&P; Filed December 15, 2010.
177. In re: Connecticut Transmission Municipal Electric Energy Cooperative. Affidavit before the Federal Energy Regulatory Commission in Docket No. ER11- on behalf of the Connecticut Transmission Municipal Electric Energy Cooperative. The purpose of this affidavit is to file Connecticut Transmission Municipal Electric Energy Cooperative proposed localized costs, revenue requirements and Schedule 21; Filed April 29, 2011.
178. In re: MidAmerican Energy Company. Answering testimony before the Federal Energy Regulatory Commission in Docket No. ER09-823-001. The purpose of my testimony is to answer and respond to the testimony filed in this proceeding by MidAmerican Energy Company ("MEC") witness Dehn A. Stevens and by Federal Energy Regulatory Commission Staff witnesses Antonio Maceo and Edward R. Gross; Filed May 2, 2011.
179. In re: Duke Energy Corporation and Progress Energy, Inc. Affidavit before the Federal Energy Regulatory Commission in Docket No. EC11-60-000, ER11-3306-000 and ER11-3307-000. The purpose of this affidavit it to report on my analyses of several elements of the proposed merger of Duke Energy Corp. and Progress Energy, Inc.; Filed June 3, 2011.



**Proceedings In Which  
Whitfield A. Russell  
Has Testified**

180. In re: New York Power Authority's 2011 Hydroelectric Rate Modification Plan. Affidavit before the Power Authority of the State of New York in I.D. No. PAS-33-11-00001-P on behalf of New York Power Authority. The purpose of this affidavit is to discuss the appropriate rates for bulk power service that the New York Power Authority will render in the 2011-2014 rate years to municipal and cooperative preference customers from NYPA's Niagara and St. Lawrence Projects; Filed October 24, 2011.
181. In re: Duke Energy Corporation and Progress Energy, Inc. Affidavit before the Federal Energy Regulatory Commission in Docket No. EC11-60-004 on behalf of the Cities of New Bern and Rocky Mount, North Carolina. The purpose of this affidavit is to examine the extent to which the four power sales agreements that the Duke Energy Corp. and Progress Energy, Inc. present as "interim mitigation" involve relinquishment of operational control over the electric resources that are Represented as being involved in those transactions. Second, to evaluate whether certain of the transmission upgrades that the Applicants propose as "permanent mitigation" are actually foreseeable and reasonably certain changes in the transmission topography of the areas affected by the proposed merger, and therefore not eligible to be considered as mitigation of merger-induced increases in market concentration; Filed April 25, 2012.
182. In re: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to § 4928.143, Ohio Rev. Code, In the Form of an Electric Security Plan. Answering Testimony before The Public Utilities Commission of Ohio in Case No. 11-346-EL-SSO, et. al. on behalf of Ormet Primary Aluminum Corporation. The purpose of this testimony is to address the Modified Electric Security Plan ("ESP II") filed on March 30, 2012, by Columbus Southern Power Company and Ohio Power Company (together called AEP and AEP Ohio); Filed May 4, 2012.

## **ANTOINE A. GAMARRA**

Antoine A. Gamarra has been a Partner at Whitfield Russell Associates since 1997. He holds a Bachelor of Science degree in Mechanical Engineering from San Jose State University.

Mr. Gamarra is experienced in power flow analysis, general rate case issues, cost of service studies, IOU/ISO/RTO transmission and ancillary tariff rate development / design, EWG applications, QF certification/recertification, standby / backup rate design, stranded cost / exit fees, avoided cost filings, demand response analysis, market price forecasting, portfolio valuation, numerous RFPs (between 5 MW to 542 MW), power contract negotiations / analysis, power plant economics / financing / justification / certification / permitting / market valuation / tax assessment, interconnection / reliability studies, merger market power analysis, acquisition studies, damage studies, load resource modeling, production cost modeling, cost-benefit modeling, loss of load probability modeling, transmission loss methodologies / analysis and transmission load flow analysis / modeling (PTI-PSS/E).

Prior to joining the firm, Mr. Gamarra was a Utility Engineer for the California Public Utilities Commission (CPUC). He testified as an expert witness and participated in numerous rate cases. When Mr. Gamarra was at the CPUC, he developed the Working Cash practice used by the CPUC for small water utilities. While at the CPUC, Mr. Gamarra attended numerous seminars such as: Mergers and Acquisitions in the Utility Industry; Rate of Return and the Cost of Capital; Spot Gas and the Electric Generation Market; U.S. Natural Gas Industry; Marginal Pricing in the Utility Industry; and the Utility Ratemaking seminar co-sponsored by the National Association of Regulatory Utility Commissioners (NARUC).

Prior to joining the firm, Mr. Gamarra was also a Patent Examiner on electro-mechanical switching for the U.S. Patent Office and a Mechanical Engineer redesigning electric trolley cars for the San Jose Trolley Corporation.

**Mr. Gamarra testified on rate base issues: including plant, depreciation reserve and expense, working cash, construction work in progress, contributions in aid of construction, and customer advances for the Proceeding Number 2-13 below:**

1. In re: Citizens Utilities Company of California, California Public Utilities Commission, Docket No. 89-03-27, concerning general office expenses and methods of cost allocation to Citizen-owned utilities from offices in Stamford, Connecticut; Redding, California; and Sacramento, California.
2. In re: Citizens Utilities Company of California, Felton District, California Public Utilities Commission, Docket No. 89-03-28. Main Issue: New Source of Supply to meet demand.
3. In re: Citizens Utilities Company of California, Sacramento District, California Public Utilities Commission, Docket No. 89-03-29. Main Issue: Growth estimates and required capacity.
4. In re: Citizens Utilities Company of California, Guernville District, California Public Utilities Commission, Docket No. 89-03-30. Main Issue: Quality of service and reliability.
5. In re: Citizens Utilities Company of California, Francis Land and Water Company, California Public Utilities Commission, Docket No. 89-03-31. Main Issue: Disallowance of plant not used and useful.
6. In re: Citizens Utilities Company of California, Montara District, California Public Utilities Commission, Docket No. 89-02-011, Order Instituting an Investigation. Main Issue: Depreciation and retirement treatment of plant.
7. In re: California Water Service Company, Los Altos-Suburban District, California Public Utilities Commission, Docket No. 88-04-070. Main Issue: New source of supply and back-up capacity.
8. In re: California Water Service Company, Dixon District, California Public Utilities Commission, Docket No. 88-04-071. Main Issue: System reliability.
9. In re: California Water Service Company, Hermosa-Redondo District, California Public Utilities Commission, Docket No. 88-04-072. Main Issue: Growth and system capacity.
10. In re: California Water Service Company, King City District, California Public Utilities Commission, Docket No. 88-04-073. Main Issue: Demand requirements and back-up capacity.
11. In re: California Water Service Company, Marysville District, California Public Utilities Commission, Docket No. 88-04-074. Main Issue: Working capital.

12. In re: California Water Service Company, South San Francisco District, California Public Utilities Commission, Docket No. 88-04-075. Main Issue: New source of supply.
13. In re: California Water Service Company, Willows District, California Public Utilities Commission, Docket No. 88-04-076. Main Issue: Back-up capacity.

**Mr. Gamarra testified on all rate cases issues: including Revenue Requirement, Operation and Maintenance Expenses, Administrative and General Expenses, Depreciation Expenses and Reserve, Taxes, Rate Base, and Rate Design for Proceeding Number 14-17 below:**

14. In re: Gibbs Ranch Water Company, California Public Utilities Commission, Docket No. 89-08-038. Main Issue: "Arms length negotiation" for construction contracts and services.
15. In re: Graeagle Water Company, California Public Utilities Commission, Docket No. 87-11-001. Main Issue: Excess capacity.
16. In re: Sorsoli Water Company, California Public Utilities Commission, Docket No. 87-02-041. Main Issue: "Rate Shock" and system reliability.
17. In re: Garrapata Water Company, California Public Utilities Commission, Docket No. 87-01-021. Main Issue: System reliability, "Rate Shock" and rate design.

**Mr. Gamarra has been involved with numerous other proceedings involving the testimony/affidavit of his partner Whitfield A. Russell and prior partner Peter Lanzalotta, since 1992. He has also performed numerous studies, proposals, and RFP solicitations on behalf of various clients. Following are just some of the cases in which he has been involved.**

18. In re: Maui Electric Company, Limited, Office of Consumer Advocate, Docket No. 7000. Developed exhibits and workpapers for plant and depreciation analyses for rate cases for the islands of Maui, Molokai and Lanai in the state of Hawaii.
19. In re: North Carolina Eastern Municipal Power Agency vs. Carolina Power & Light. Developed historical and future load resource models for various scenarios in this damage lawsuit. Modeled historical and future purchased capacity billings by calculating levelized depreciation, earnings, income taxes and amortization of Investment Tax Credits. Also involved in debt service calculations.
20. Participated in a study correlating the avoided cost to gas prices for future electric generation, on behalf of MidAtlantic Cogen, Inc.
21. In re: Houston Lighting & Power Company's Standard Avoided Cost Calculation, Docket No. 10832, before the Public Utility Commission of Texas. Converted Houston Light &

- Power Company's McModel, Cost/Benefit model, from a mainframe UNIX C program to PC C++ version and ran various scenarios for intervenors using McModel.
22. In re: Application of Texas Utilities for Authority to Change Rates, before the Public Utility Commission of Texas, Docket No. 11735, on behalf of Cap Rock Electric Cooperative, Inc. Developed Standby Rates, Standby Tariffs and Testimony.
  23. In re: Application of Houston Lighting & Power Company for a Certificate of Convenience and Necessity for the DuPont Project, before the Public Utility Commission of Texas, Docket No. 11000, on behalf of Destec Energy, Inc. Modeled Steam Agreement contract and ran various scenarios using the McModel Cost/Benefit model.
  24. In re: Application of Cap Rock Electric Cooperative, Inc. for a Certificate of Convenience and Necessity, before the Public Utility Commission of Texas, Docket No. 11248, on behalf of Cap Rock Electric Cooperative, Inc., concerning proposed transmission system improvements.
  25. In re: Commonwealth Edison Company, Proposed General Increase in Electric Rates, before the Illinois Commerce Commission, Docket No. 94-0065, on behalf of the City of Chicago, conducted a Loss of Load Probability Analysis for reserve margin determination.
  26. Developed a "short-cut" production model to estimate future Pennsylvania-New Jersey-Maryland (PJM) running rates on behalf of Solar Turbines, Inc.
  27. Conducted Production Cost simulations for two utilities.
  28. Evaluated and translated documents regarding the SUPER Electric System Planning Model developed by the Latin American Organization of Energy for BHP Petroleum.
  29. In re: Application of Texas Utilities Electric Company for Authority to Implement Economic Development Service, General Service Competitive Pricing, Wholesale Power Competitive Pricing, and Environmental Technology Service, Docket No. 13100, before the Public Utility Commission of Texas, on behalf of Rayburn Country Electric Cooperative, Inc., concerning TU Electric's "competitive rates."
  30. In re: Complaint of Kenneth D. Williams v. HL&P, Docket No. 12065, on behalf of Destec before the Public Utility Commission of Texas.
  31. In re: Rebuttal testimony in a Complaint of Tex-La v. TUEC, Docket No. 12362, on behalf of Rayburn County Electric Coop. before the Public Utilities Commission of Texas.
  32. In re: Application for Authorization and Approval of Merger Between Wisconsin Electric Power Company, Northern States Power Company (Minnesota), Northern States Power Company (Wisconsin), and Cenergy, Inc., in Docket No. EC-95-16-000, before the

- Federal Energy Regulatory Commission (on behalf of Certain Intervenors), in Docket Nos. 6630-UM-100 and 4220-UM-101, before the Wisconsin Public Service Commission and Docket No. 6-2500-10601-2 before the Minnesota Office of Administrative Hearings for the Minnesota Public Utilities Commission, concerning the effect upon transmission access of the merger of NSP and WEPCO into Primergy.
33. In re: Alberta Electric Utilities 1996 Tariff Application before the Alberta Energy And Utilities Board, on behalf of the Industrial Power Consumers Association of Alberta concerning calculation of charges for ancillary services.
  34. In re: Central Power and Light and West Texas Utilities Filing in Compliance with Subst. Rule 23.67, Docket No. 15643, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
  35. In re: Texas Utilities Electric Company, Filing in Compliance with Subst. Rule 23.67, Docket No. 15638, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
  36. In re: Docket No. 15840, Regional Transmission Proceeding to Establish Postage Stamp Rate and Statewide Load Flow Pursuant to P.U.C. Subst. Rule. 23.67 on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas.
  37. In re: Rebuttal Testimony on behalf of MG&E, WIEG, WFC, CUB in Docket Nos. 6630-UM-100 and 4220-UM-101 before the Public Services Commission of Wisconsin; regarding merger, November 5, 1996.
  38. In re: Houston Lighting & Power Company Filing in Compliance with Subst. Rule 23.67, Docket No. 15639, before the Public Utility Commission of Texas, on behalf of Certain Power Marketers and Independent Power Producers, Destec Power Services and Enron Power Marketing, concerning Ancillary Services under the state-wide rate in Texas; September 30, 1996.
  39. In re: IES Utilities, Inc., Interstate Power Company, Wisconsin Power & Light Company, South Beloit Water, Gas & Electric Company, Heartland Energy Services, and Industrial Energy Applications, Inc., Docket Nos. EC96-13-000, ER96-1236-000, and ER96-2560-000, before the Federal Energy Regulatory Commission, on behalf of Wisconsin Intervenors ("WI"). The WI included municipal utilities and groups, industrial customers, rural electric cooperatives, and investor-owned utilities within the state of Wisconsin. Two sets of testimony; the first, analyzed engineering and operating problems created by the merger of WP&L, IPW and IES. The second set of testimony discussed how the IEC Independent System Operator ("ISO") failed in general to meet the rigorous and

comprehensive ISO standards promulgated by the Wisconsin Public Service Commission (WPSC). Both sets of testimony (Engineering and ISO) were filed before the Federal Energy Commission; March 27, 1997.

40. In re: Joint Application of WPL Holdings, Inc. and Wisconsin Power & Light Company for all Requisite Approvals in Connection with a Series of Related Transactions by which Interstate Power Company Becomes a Subsidiary of WPL Holdings, Inc., IES Industries, Inc. is Merged into WPL Holdings, Inc. and is Renamed Interstate Power Corporation and for Certain Related Transactions and Matters, in Docket No. 6680-UM-100, before the Public Service Commission of Wisconsin; May 7, 1997.
41. In re: City of College Station, FERC Docket No. TX 96-2-000, concerning transmission rates; November 7, 1997.
42. In re: Application for Approval of Restructuring Plan Under Section 2806 of the Public Utility Code, in Docket No. R-00973981 / R-00974104 on behalf of Mid-Atlantic Power Supply Association, before the Pennsylvania Public Utility Commission; November 7, 1997.
43. In re: Ormet Primary Aluminum Corporation, on behalf of Ormet Primary Aluminum Corporation, Arbitration Number 55-199-0051-94, before the American Arbitration Association, concerning the relationship between AEP and other power systems within NERC and ECAR; July 14, 1998
44. In re: Rebuttal Testimony in response to Mr., Walter R. Kelley and Mr. Thomas Kennedy, on behalf of Ormet Primary Aluminum Corporation, Arbitration Number 55-199-0051-94, before the American Arbitration Association; September 2, 1998.
45. In re: Application No. RE95081 – TransAlta Utilities Corp., on behalf of Albchem Industries Ltd., CXY Chemicals and Dow Chemicals Canada Ltd., before the Alberta Energy & Utilities Board addressing ACD's interest in providing interruptible service; October 1998.
46. In re: Tri-State Generation and Transmission Assoc., Inc., in Arbitration No. 77 Y 181 0023097 before the American Arbitration Association; September 14, 1998.
47. In re: Petition for Order Concerning Delineation of Transmission and Local Distribution Facilities, Docket No. 98-0894 on behalf of The City of Chicago, before the Illinois Commission in reference to re-functionalization; April 2, 1999.
48. In re: Kansas Municipal Energy Agency ("KMEA"), Docket No. ER00-2644-000, before the Federal Energy Regulatory Commission ("FERC") to review, assess and comment on the actions taken by the Southwest Power Pool in connection with two transmission service requests made by the Kansas Municipal Energy Agency aggregating 39 MW of contract demand; December 8, 2000.

49. In re: Occidental Chemical Corporation, testimony in Docket No. U-25533, before the Louisiana Public Service Commission on behalf of "OxyChem" for the purpose of (1) to demonstrate the problems with the Louisiana Public Service Commission Staff's proposal that each of ELI and EGS change their interruptible rate schedules from a reliability-based curtailment methodology and (2) to recommend that the Commission defer consideration of Staff's proposal; May 3, 2001.
50. In re: Alliance Companies, et al., Affidavit in Docket Nos. RM01-12-000, RT01-87-000 and RT01-88-000, before the Federal Energy Regulatory Commission on behalf of the Ormet Primary Aluminum Corporation, for the purpose of providing relevant engineering fundamentals related to the proper design of methodology for quantifying transmission losses and for allocating such losses to the customers of regional transmission organizations; March 12, 2002.
51. In re: Response to PacifiCorp Motion: Affidavit in Response to PacifiCorp's Daubert Motion Regarding Richard Slaughter and Supplemental Expert Report on behalf of Snake River Valley Electric Association; Prepared Damage Study. September 10, 2002.
52. In re: American Electric Power Corp.: Affidavit in Docket No. ER03-242, before the Federal Energy Regulatory Commission on behalf of Ormet Primary Aluminum Corp. to respond to AEP's proposed electric transmission rates to be included in the OATT of the PJM Interconnection; December 24, 2002.
53. In re: Ormet Primary Aluminum Corporation v Entergy-Koch Trading LP, on behalf of Ormet Primary Aluminum Corporation. Damage Study for breach of contract. February 20, 2003.
54. In re: Ameren Services Company, et al.: Affidavit in Docket No. EL03-212-000, before the Federal Energy Regulatory Commission on behalf of Ormet Primary Aluminum Corp. to respond to AEP's Submission in Response to the Commission's Section 206 Investigation; Beginning of Seams Elimination Charges/Costs Adjustments/Assignments (SECA) rate design involvement; September 2, 2003.
55. In re: Pacific Gas and Electric Company SCS Tariff: Direct Testimony in Phase I before the Federal Energy Regulatory Commission in Docket Nos. ER00-565-000, ER00-565-003, and ER00-565-007 on behalf of the Northern California Power Agency. The purpose of the testimony is to explain the nature of the costs for which Pacific Gas and Electric Company seeks recovery through its Scheduling Coordinator Service Tariff; September 13, 2004.
56. In re: Pacific Gas and Electric Company SCS Tariff: Direct Testimony in Phase II before the Federal Energy Regulatory Commission in Docket Nos. ER00-565-000 and ER00-565-003 on behalf of the Northern California Power Agency ("NCPA"). The purpose of the testimony is to discuss PG&E's propriety in passing through ISO Charge Type costs as Scheduling Coordinator Service charges to NCPA under the terms of the NCPA-PG&E Interconnection Agreement; September 13, 2004.



57. In re: Cabazon Wind Partners, LLC Complainant vs. Southern California Edison Company Respondent: Affidavit in Docket No. EL04-137 before the Federal Energy Regulatory Commission on behalf of Cabazon Wind Partners, LLC (“Cabazon”). This Affidavit provides support for Cabazon's request that Southern California Edison Company (“SCE”) grant Cabazon reimbursement, in the form of a transmission credit or otherwise, for the cost of certain upgrades Cabazon has borne to interconnect its generation to SCE; September 27, 2004.
58. In re: Southern California Edison IFA Agreement: Cross Answering Testimony before the Federal Energy Regulatory Commission in Docket No. ER02-2189-003 on behalf of Whitewater Hill Wind Partners. The purpose of the testimony is to respond to testimony filed on October 28, 2004, in this proceeding by Commission Staff witnesses, Ms. Tania Martinez Navedo and Mr. Edward W. Mills. The issue in this case involves the designation of disputed upgrades contained in the IFA between Whitewater and Southern California Edison Company; September 14, 2004
59. In re: Petition for a Declaratory Order or Advisory Opinion as to the Applicability of the Commission’s Decision in Docket No. 03-10003: Affidavit in Docket No. 04-10023, before the Public Utilities Commission of Nevada on behalf of Ridgewood Renewable Power, LLC (“Ridgewood”) with respect to a landfill methane gas powered electric generating project located at the Olinda/ Alpha landfill in Orange County, California; December 30, 2004.
60. In re: Southern California Edison, California Wind Energy Association and the Proposed Antelope-Tehachapi 230 kV Line: Affidavit before the Federal Energy Regulatory Commission in Docket No. EL05-80-000, on behalf of the California Wind Energy Association (“CalWEA”). The purpose of this affidavit is to explain how and why the proposed Antelope-Tehachapi 230 kV line will be integrated into the regional transmission grid and thereby constitute a network upgrade facility; April 14, 2005.
61. In re: American Electric Power Corporation and the Network Integration Transmission Service: Affidavit before the Federal Energy Regulatory Commission in Docket No. ER05-751-000, on behalf of Ormet Primary Aluminum Corporation. The purpose of this affidavit is to respond to American Electric Power Corporation’s (AEP’s) request (a) to increase its annual Network Integration Transmission Service (NTS) revenue requirements to \$486 million per year and (b) to increase the NTS rates; April 29, 2005.
62. In re: Cabazon Wind Partners, LLC Request for Reimbursement of Interconnection Costs from Southern California Edison: Prepared Direct Testimony before the Federal Energy Regulatory Commission in Docket No. EL04-137, on behalf of Cabazon Wind Partners, LLC. The purpose of this testimony is to provide support for Cabazon’s request that Southern California Edison (“SCE”) grant Cabazon reimbursement, in the form of transmission credit or otherwise, for the cost of certain upgrades Cabazon has borne to interconnect generation to SCE; May 20, 2005.
63. In re: The Matter of the Arbitrations between PG&E Energy Trading-Power, LP

- Claimant, Counter-Respondent and Southaven Power, LLC, and Caledonia Generating, LLC, Respondents, Counter-Claimants, in Docket Nos. 16-198-00206-03 & 16-198-00207-03, helped prepare and edit an Expert Report concerning the disputes between the parties involving tolling agreements, interconnection rights, and transmission service requests for service and availability; September 8, 2005.
64. In re: Ormet Primary Aluminum Corporation and the SECA Rate Design: Pre-Filed Rebuttal Testimony before the Federal Energy Regulatory Commission in Docket No. ER05-6-001, et al, on behalf of Ormet Primary Aluminum Corporation. The purpose of this testimony is to analyze the proposed Seams Elimination Charges/Costs Adjustments/Assignments (SECA) rate design and recommend a SECA Rate Design; October 24, 2005.
  65. In re: Berkshire Power Company, LLC, participated in review of a cost-of-service filing by a generator, concerning the eligibility of the generator for a reliability must run agreement with the ISO-New England, in Docket No. ER05-1179-001 before the Federal Energy Regulatory Commission; November 7, 2005.
  66. In re: In the Matter of the Application of Ohio Power Company for Approval of a Special Contract Arrangement with Ormet Primary Aluminum Corporation, In the Matter of the Joint Petition of Ohio Power Company and South Central Power Company for Reallocation of Territory, In the Matter of: Ormet Primary Aluminum Corporation and Ormet Primary Mill Products Corporation v. South Central Power Company and Ohio Power Company: Pre-Filed Testimony before the Public Utilities Commission of Ohio in Docket Nos. 96-999-EL-AEC, 96-1000-EL-PEB and 05-1057-EL-CSS, on behalf of Ormet Primary Aluminum Corporation. The purpose of this testimony is to analyze: (a) the effect upon the ratepayers of South Central and Buckeye of requiring South Central to serve Ormet and (b) the effect upon the ratepayers and stockholders of Ohio Power Company (“OPCO”) of requiring OPCO to serve Ormet’s full requirements under OPCo’s retail GS-4 rate schedule; September 8, 2006.
  67. In re: Delmarva Power & Light Company (“Delmarva”), Conectiv Energy (“CE”), Conectiv Energy Services (“CESI”) et al. (“Plaintiffs”), on the one hand, and Defendant Motiva Enterprises LLC (“Motiva”); Damage Study for claims between parties. Motiva sells power from it own 66 MW generation plant to Delmarva; June 17, 2007.
  68. In re: Cabot Corporation, Plaintiff v. Private Power, LLC, Private Power et al., Defendants, and Counterclaims; Damage Study for claims between parties. Cabot was the host to a cogeneration plant developed by Private Power; December 20, 2007.
  69. In re: Columbus Southern Power Company and Ohio Power Company: Affidavit before the Public Utilities Commission of Ohio in Case Nos. 07-1132-EL-UNC, 07-1191-EL-UNC, 07-1278-EL-UNC, and 07-1156-EL-UNC, on behalf of Ormet Primary Aluminum Company. The purpose of this affidavit is in the matter of the Application of Columbus Southern Power Company and Ohio Power Company for approval of an additional

generation service rate increase pursuant to their post-market development period rate stabilization plans and to update each company's transmission cost recovery rider; February 28, 2008.

70. In re: In the Matter of the Ontario Energy Board Act, 1998, S.O. 1998, C.15 (Sched. B); In the Matter of an Application by Hydro One Networks Inc. pursuant to section 92 of the Act, for an Order or Orders granting leave to construct a transmission reinforcement project between the Bruce Power Facility and Milton Switching Station, all in the Province of Ontario: Affidavit and Exhibits before the Ontario Energy Board in Docket No. EB-2007-0050, on behalf of the Saugeen Ojibway Nations. The purpose of this affidavit is to review the analyses performed by the Ontario Power Authority, Hydro One and the Independent Electric System Operator of Ontario in support of the application to construct a proposed Bruce-to-Milton double circuit 500 kV transmission line project; April 18, 2008.
71. In re: In the Matter of sections 25.30 and 25.31 of the Electricity Act and In the Matter of an Application by Ontario Power Authority for review and approval of its integrated power system plan and approval of its proposed procurement process. Affidavit and Exhibits before the Ontario Energy Board in Docket No. EB-2007-0707, on behalf of the Saugeen Ojibway Nations. The purpose of this affidavit is to review the Integrated Power System Plan ("IPSP") prepared by the Ontario Power Authority, and discuss that Plan as it relates to the concerns of the Saugeen Ojibway Nations; Filed August 1, 2008.
72. "Preliminary Feasibility Study of Municipalizing the Electric Distribution System for the Village of Lakewood, the Town of Busti and part of the Town of Ellicott" prepared by Whitfield Russell Associates, December 2008.
73. In re: Application of Trans-Allegheny Interstate Line Company for (I) Certificate of Public Convenience...For...High Voltage Electric Transmission Lines.... Docket No. A-110172, on behalf of all parties (the Collaborative). "Technical Report for the Collaborative produced by Whitfield Russell Associates" which provides details of the analytical work regarding criteria violations and solutions to solve the criteria violations. Load flow studies, generation studies and load forecasts were done; July 15, 2009.
74. In re: Missouri River Energy Services and Midwest Independent Transmission System Operator, Inc. and Missouri River Energy Services and Western Minnesota Municipal Power Agency. Rebuttal Testimony before the Federal Energy Regulatory Commission in Docket No. ER08-370-008 and EL08-22-006, on behalf of Missouri River Energy Services and the Western Minnesota Municipal Power Agency. Regarding MISO Attachment O Rate Formulae; Filed October 9, 2009.

## **GENEVA GRAHAM LOOKER**

Geneva Graham Looker is a Senior Associate at Whitfield Russell Associates. She holds a Bachelor of Arts degree from Hope College, and a Master of Business Administration from George Washington University. Mrs. Looker has worked for the firm as an Associate, a Senior Associate and an Associated Consultant for more than 15 years.

Mrs. Looker has participated in many cases of WRA in a variety of functions. Her work has included preparation and critiques of numerous cost of service studies. She has led the firm's settlement negotiations at FERC and at the Bonneville Power Administration on behalf of Native American Tribes. She has managed the preparation and of testimony and the firm's litigation support of lead attorneys in dozens of major proceedings before State and Federal courts, agencies and arbitration panels. Her work has included excess capacity determinations, replacement power cost calculations, research on refusals to transmit third party energy, development of generating unit performance standards and a cost/benefit analysis of a street lighting system purchase. She has also analyzed data and prepared spreadsheets and exhibits detailing the damages caused by breach of contract between utilities. Mrs. Looker has attended numerous seminars on Utility Regulation and Rate Design, presented by Public Utilities Reports, Inc., and Scott Hempling, Esq.

In addition to her work with WRA, Mrs. Looker has also worked at Martin Capital Management, the International Monetary Fund, and the American Public Power Association.