IIEC Exhibit 2

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO,	)	
Proposal to implement a competitive procurement process by establishing Rider BGS, Rider BPS-L, Rider RTP, Rider RTP-L, Rider D and Rider MV	)	**No. 05-0160**
CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS,	)	
Proposal to implement a competitive procurement process by establishing Rider BGS, Rider BPS-L, Rider RTP, Rider RTP-L, Rider D and Rider MV	)	**No. 05-0161**
ILLINOIS POWER COMPANY d/b/a AmerenIP,	)	
Proposal to implement a competitive procurement process by establishing Rider BGS, Rider BPS-L, Rider RTP, Rider RTP-L, Rider D and Rider MV	)	**No. 05-0162**

Direct Testimony of

James R. Dauphinais

On Behalf of

Illinois Industrial Energy Consumers

June 15, 2005
Project 8378

BRUBAKER & ASSOCIATES, INC.
ST. LOUIS, MO 63141-2000

STATE OF ILLINOIS

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Direct Testimony of James R. Dauphinais

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A My name is James R. Dauphinais. My business address is 1215 Fern Ridge Parkway, Suite 208; St. Louis, Missouri 63141.

Q PLEASE STATE YOUR OCCUPATION.

A I am a consultant in the field of public utility regulation with Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A This is summarized in Appendix A to my testimony.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am appearing on behalf of the Illinois Industrial Energy Consumers ("IIEC"). The IIEC is an ad hoc group of industrial customers eligible to take power and energy or delivery service from one or more of the Ameren Operating Companies ("Ameren") in Illinois (AmerenCILCO, AmerenCIPS and AmerenIP).

Q WHAT IS THE SUBJECT MATTER OF YOUR TESTIMONY?

A I address the following issues related to Ameren's filing in this proceeding, including:

- The need for the Commission to encourage a single power procurement auction for Ameren and Commonwealth Edison Company ("ComEd") within Illinois in order to maximize the competitiveness of the proposed power procurement auctions.
- The need to assure that capacity charges under Rider RTP-L for self-generating customers taking standby service are just and reasonable.
- The need to allow Rider BGS-L customers to participate as Demand Response Resources in the Midwest Independent Transmission System Operator, Inc. ("MISO") markets.
- The need to allow Rider RTP-L customers who meet MISO Interruptible Demand requirements the opportunity to avoid capacity charges.
- The justness and reasonableness of Ameren's proposed Default Supply Service Availability Charge.

My failure to address an issue should not be interpreted as tacit approval of any position taken by Ameren.

Q DO YOU HAVE ANY RECOMMENDATIONS FOR THE COMMISSION?

A Yes. I have the following recommendations:

1. As a condition of any approval to use the proposed power procurement auctions, the Commission should require that Ameren work with ComEd, MISO and the PJM Interconnection LLC ("PJM") to remove, as soon as practicable, impediments to a single common power procurement market for the Ameren Operating Companies and ComEd in Illinois. In any event, Ameren should be required to work with ComEd, MISO and PJM to implement as soon as practicable a single common deliverability test for resources within the combined MISO and PJM footprint to serve network load within the Ameren Operating Companies and ComEd within Illinois that will permit a joint auction by a date certain. In addition, Ameren should be required to report the status of the development of a common deliverability test and joint procurement market within 90 days of a Commission order in this proceeding and every 90 days thereafter until a common deliverability test and joint auction are implemented.

2. Ameren's proposed Rider RTP-L should be modified to ensure that Ameren's proposal to bill self-generating customers taking Rider RTP-L for capacity on a per kW-Day basis, is properly reflected in the tariff.

3. The Commission should require Ameren to permit customers under Ameren's Rider BGS-L to act as Demand Response Resources in the MISO markets.

4. The Commission should require that Ameren modify its BGS-LRTP auction and Rider RTP-L proposals to permit hourly pricing customers, who meet the MISO Interruptible Demand requirements, an exemption from capacity charges. Otherwise, hourly pricing customers who meet MISO Interruptible Demand requirements will unjustly and unreasonably be required to purchase unneeded capacity through Ameren's hourly pricing proposal.

5. The Commission should reject Ameren's proposed Default Supply Service Availability Charge.

I. THE NEED FOR A SINGLE COMMON POWER PROCUREMENT AUCTION

Q HAS AMEREN PROPOSED ITS COMPETITIVE PROCUREMENT AUCTION ("CPA") BE PERFORMED JOINTLY WITH COMED'S PROPOSED ILLINOIS AUCTION PROPOSAL?

A No. Under a joint auction ("joint auction") there would be a single set of auction rules and supplier qualification rules. More importantly, bidders would be permitted to freely switch between utility load zones (e.g., Ameren and ComEd) during the rounds of bidding. A joint auction is the approach currently used within the State of New Jersey. Ameren has not proposed a joint auction in Illinois at this time.

Q WHAT WOULD BE THE ADVANTAGES OF CONDUCTING A JOINT AUCTION FOR COMED AND AMEREN?

A Provided that the resources that would need to be aggregated by bidders to serve load in one load zone were as easily able to serve load in the other load zone, a joint auction would provide lower market clearing prices for the load zones. Lower market clearing prices would result because the auction would be more competitive in both load zones, since the load zones would not be bifurcated into two separate auctions. In separate auctions bidders would likely be inclined to participate in one load zone or the other if they cannot easily move their aggregate resources between the two auctions. This bifurcates the market, making each auction less competitive.

Q WHAT IS A PARALLEL AUCTION?

A A parallel auction is a concept ComEd introduced in its Illinois Auction Proposal in Docket No. 05-0159. Under ComEd's parallel auction concept Ameren and ComEd's auctions would be performed at the same time, share the same auction advisor and share the same auction manager. My colleague Mr. Collins has proposed the initial auctions and subsequent auctions for Ameren and ComEd be held in parallel until a joint auction is held. I recommend the Commission require a joint auction be implemented as soon as possible.

Q WOULD A PARALLEL AUCTION PROVIDE THE BENEFITS OF A "JOINT" AUCTION?

A No. While a parallel auction can potentially provide certain efficiencies through sharing auction managers, and auction advisors, a parallel auction is still bifurcated and will result in higher market clearing prices than a joint auction.

Q IS AMEREN A PART OF THE SAME REGIONAL TRANSMISSION ORGANIZATION AS COMED?

A No, it is not. ComEd is a member of PJM, and Ameren is a member of MISO.

Q WHAT IS THE SIGNIFICANCE OF THE FACT THAT THESE COMPANIES BELONG TO DIFFERENT RTOs?

A The significance for the purpose of this proceeding is that it can make it difficult for a bidder to rely on the same underlying capacity for both auctions as that capacity is not fully interchangeable.

Q DOES A JOINT AND COMMON MARKET FOR PJM AND MISO NEED TO BE OPERATIONAL PRIOR TO IMPLEMENTING A JOINT AUCTION?

A No. While the implementation of a joint and common market should be pursued as soon as practicable to eliminate all vestiges of market bifurcation and maximize the fungibility of capacity products between the two RTOs, full implementation of a joint and common market in itself is not, and should not be, a prerequisite to a joint auction. There are steps that can be taken prior to the implementation of a joint and common market that would allow the implementation of a joint auction. Furthermore, we may be some years away from the implementation of a true joint and common market. MISO and PJM have just begun to conduct stakeholder comments to help develop a detailed timeline for establishing a joint and common market. In a March 3, 2005 order in Docket No. ER04-375-017, et al., the FERC has required that MISO and PJM file a proposed detailed timeline by no later than October 31, 2005. It is not necessary to delay the benefits a joint auction may offer until a single market can be achieved.

Q IF A JOINT AND COMMON MARKET IS NOT A MANDATORY PREREQUISITE TO A JOINT AUCTION, ARE THERE ANY PREREQUISITES TO A JOINT AUCTION?

A Yes, there is one prerequisite. There is an unduly disparate treatment of capacity resources in PJM versus those in MISO for service to MISO load. There is a similarly disparate treatment of capacity resources in MISO versus those in PJM for service to PJM load. These disparities serve as a strong disincentive for those with capacity resources in PJM to bid into the Ameren auction and for those with capacity resources in MISO to bid into the ComEd auction. This disparate treatment strongly bifurcates the Ameren and ComEd auctions making them less competitive. It also precludes the receipt of the benefits a joint auction would bring, because bidders are unlikely to switch their bids between load zones during auction rounds with such market bifurcation. Thus, elimination of this disparate treatment of capacity resources is a prerequisite to conducting a joint auction.

Q PLEASE EXPLAIN THE NATURE OF THE UNDULY DISPARATE TREATMENT OF CAPACITY YOU HAVE DESCRIBED.

A Separately, the MISO and PJM perform a test for capacity resources to determine whether those capacity resources are deliverable to aggregate load in their respective footprints. For example, all capacity resources within MISO that are deemed "deliverable" may be designated as a Network Resource for any load within MISO without the need of a transmission study.

However, capacity resources deemed "deliverable" in PJM are not automatically deemed deliverable to load in MISO. For a capacity resource in one RTO to be deemed deliverable in the other RTO, firm point-to-point transmission service must be requested from the capacity resource to the boundary with the other

RTO. In addition, transmission studies that can be lengthy (at least 60 days) and costly (on the order of tens of thousands of dollars) may be required by the RTOs both within the individual RTO in which the capacity resource is located and in the other RTO in which the load is located. Furthermore, even if these studies show that the resource is deliverable for one auction, this deliverability finding would not apply in future auctions. New studies would be needed for future auctions. These hurdles make it cumbersome and expensive for bidders to rely on capacity resources in PJM for the Ameren auction and on capacity resources in MISO for the ComEd auction. Therefore, bidders will be inclined to rely on resources inside PJM for the ComEd auction and inside MISO for the Ameren auction.

Q WHAT WOULD HAPPEN IF THE COMMISSION WERE TO REQUIRE A JOINT AUCTION WITHOUT FIRST RESOLVING THE DISPARATE TREATMENT OF CAPACITY?

A There would likely be very little switching of bidder offers between the Ameren and ComEd auctions because the capacity or financial equivalent of capacity underlying the bids would not be interchangeable between the Ameren and ComEd load zones. This means the auction results in each load zone could be very different. Furthermore, because a joint auction might only be able to be rejected by the Commission in its entirety, there is a risk that an unsatisfactory price result in one load zone could require the Commission to also throw out a satisfactory price result in the other load zone. While this risk could be mitigated by providing an option for the Commission to reject auctions by load zone, this mitigation would further disincent bid switching between load zones because there would be no certainty the Commission would approve the auction results for both load zones. Thus, it would be risky for

bidders to move their bid from one load zone to the other. The implementation of a common deliverability standard as I recommend below would minimize this risk.

Q YOU INDICATED THAT A JOINT AND COMMON MARKET FOR PJM AND MISO IS DESIRABLE, BUT NOT NECESSARY TO ENABLE A JOINT AUCTION. SHORT OF CREATION OF A JOINT AND COMMON MARKET, WHAT SHOULD BE DONE TO FACILITATE A JOINT AUCTION?

A The disparate treatment of capacity resources should be removed in Illinois. This could be achieved by developing a common deliverability test for capacity resources within the combined MISO and PJM footprint to the combined ComEd and Ameren load zones in Illinois. I am not an attorney and cannot determine if the Commission can require MISO and PJM to establish such a joint deliverability test for Illinois only, or require Ameren and ComEd to do so on their own. However, the Commission can require Ameren to work with ComEd, MISO and PJM to establish a common deliverability test for Illinois load and a joint power procurement auction. In addition, the Commission can condition the continued use of procurement auctions on establishment of a common deliverability test and a joint auction by a date certain. Until a joint auction is implemented, the Ameren and ComEd auctions should be conducted in parallel, as discussed in the testimony of Mr. Collins.

Q DO YOU RECOMMEND THE COMMISSION CONDITION ITS APPROVAL OF AMEREN'S COMPETITIVE PROCUREMENT AUCTION PROPOSAL ON AMEREN PURSUING AND ULTIMATELY IMPLEMENTING A COMMON DELIVERABILITY TEST FOR ILLINOIS AND A JOINT POWER PROCUREMENT AUCTION?

A Yes. Separate auctions will not lead to the acquisition of power and energy at the least cost for customers. I do not believe Ameren's auction and ratemaking proposal would be just and reasonable unless the bifurcation between the MISO and PJM capacity is addressed as soon as practicable and a joint procurement auction is subsequently implemented for the Ameren and ComEd load zones.

II. JUST AND REASONABLE CAPACITY CHARGES FOR SELF-GENERATION CUSTOMERS

Q WHAT SERVICE WOULD BE AVAILABLE TO SELF-GENERATION CUSTOMERS 5 MW OR LARGER UNDER AMEREN'S PROPOSAL?

A For backup service Ameren proposes to offer its self-generation customers 5 MW or larger hourly pricing under Rider RTP-L. These customers include, but are not limited to, customers with generation facilities that are Qualifying Facilities under the Public Utility and Regulatory Policies Act of 1978 ("PURPA") that are 5 MW or larger.

Q HOW WOULD HOURLY PRICING SERVICE UNDER RIDER RTP-L BE STRUCTURED?

A RTP-L customers would be charged a capacity charge derived from Ameren's proposed BGS-LRTP auction. These customers would pay for energy hourly based on the real-time locational marginal price for their load zone within MISO.

Q IS IT APPROPRIATE TO DERIVE AND BILL CAPACITY CHARGES FOR SELF-GENERATING CUSTOMERS IN THE SAME MANNER AS FOR OTHER HOURLY PRICING CUSTOMERS?

A Only if such charges are applied to self-generating customers only on the actual days when energy was drawn by self-generating customers. Self-generating customers generally have a very low load factor and generally only draw energy during limited periods of the year, mostly confined to maintenance outages taken during off-peak times of the year. Capacity charges for self-generating customers should reflect their ability to schedule generation maintenance during off-peak periods of the year and the unlikely occurrence of outages during peak system load conditions or simultaneous with other outages. It is common practice for these customers to take service under standby service contracts that require maintenance to be taken during certain times of the year. Moreover, these standby contracts generally include backup power provisions that reflect the fact that forced outages or deratings of multiple customer generation facilities will not occur simultaneously, or during system peak load conditions, or both. For example, AmerenIP's existing Service Classification 22 – Standby Service contains specific requirements on when power for maintenance outages can be taken and includes a demand charge that reflects the fact that simultaneous forced outages and outages under system peak load conditions are unlikely for customer-owned generation. I have attached Service Classification 22 as Schedule 1 to my testimony (IIEC Exhibit 2, Schedule 1). Moreover, FERC regulations related to PURPA require that for qualifying facilities:

> The rate for sales of back-up power or maintenance power:
> (1) Shall not be based upon an assumption (unless supported by factual data) that forced outages or other reductions in electric output by all qualifying facilities on an electric utility's system will occur simultaneously, or during the system peak, or both; and
> (2) Shall take into account the extent to which scheduled outages of the qualifying facilities can be usefully coordinated with scheduled outages of the utility's facilities.
>
> (Section 292.205(c) of Title 18 of the Code of Federal Regulations)

Q DO YOU HAVE ANY RECOMMENDATION FOR THE COMMISSION ON THIS ISSUE?

A Yes, I do. Ameren should be required to either:

- Bill self-generating customers taking Rider RTP-L hourly pricing service for capacity on a per kW-day basis on those days energy is actually taken from Ameren or

- Adjust self-generating customer capacity charges through a rate translation process to reflect the low likelihood that all such customers will experience generation outages at the same time, at the time of system peak, or both and their ability to commit to performing generation maintenance during off-peak periods of the year.

I would note it may be appropriate under the latter approach to place certain operating requirements on customers similar in nature to those under Ameren's existing Service Classification 22 - Standby Service.

Q PLEASE EXPLAIN HOW THE FIRST OPTION UNDER YOUR RECOMMENDATION PROPERLY ADDRESSES CAPACITY CHARGES FOR SELF-GENERATING CUSTOMERS.

A Under the first option, self-generation customers only pay for capacity on those days in which they draw energy. This properly avoids having these customers pay for capacity when they are not placing a demand on the system. This is consistent with the concept of reflecting that it is unlikely forced outages for one standby customer

will occur at the same time as forced outages for other standby customers, or at the time of system peak, or both. The first option is my preferred option.

Q HAS AMEREN PROPOSED TO BILL RIDER RTP-L CUSTOMERS, INCLUDING SELF-GENERATING CUSTOMERS TAKING SUCH HOURLY PRICING SERVICE, FOR CAPACITY ON A PER KW-DAY BASIS?

A Yes, according to Ameren's response to Data Request No. IIEC 3-5 and my understanding of what Ameren is proposing. However, Ameren's language in Rider MV concerning the capacity charge for Rider RTP-L customers, which is referred to as an Hourly Auction Supply Charge, needs to be revised to be consistent with Ameren's stated intention to impose a per kW-day charge for capacity.

Q DOES AMEREN INTEND TO REVISE THE RELEVANT LANGUAGE IN RIDER MV?

A It is my understanding that it intends to do so. If Ameren revises the tariff language to be consistent with their expressed intent to bill for capacity on a per kW-day basis then my concern would be satisfactorily resolved. In that event the Commission would not need to act on my recommendation in regard to this issue.

III. MISO DEMAND RESPONSE RESOURCES

Q WHAT IS A MISO DEMAND RESPONSE RESOURCE?

A It is a load located within the MISO footprint that is monitored by the MISO and permitted to participate in the MISO's markets by offering to interrupt energy consumption.

Q CAN NON-RESIDENTIAL CUSTOMERS TAKING FIXED PRICED BUNDLED SERVICE ACT AS DEMAND RESPONSE RESOURCES?

A Not under Ameren's proposed rates.

Q SHOULD AMEREN BE REQUIRED TO MODIFY ITS FIXED PRICE RIDERS TO PERMIT SUCH CUSTOMERS TO PARTICIPATE IN THE MISO MARKETS AS DEMAND RESPONSE RESOURCES THROUGH AMEREN AND MISO MARKET PARTICIPANTS?

A Yes. Demand response is critical for mitigating very high market prices and maintaining supply adequacy during periods when supply adequacy is very tight. Fixed price customers normally have no incentive to curtail demand. The MISO Demand Response Resource opportunity provides a necessary economic incentive for fixed price customers to curtail load when needed. Non-residential customers taking fixed price bundled service, including Rider BGS-L customers, should be provided the option to directly participate as Demand Response Resources in the MISO markets through Ameren and other MISO Market Participants.

IV. INTERRUPTIBLE HOURLY SERVICE

Q ARE THERE CONDITIONS UNDER THE MISO TARIFFS OR AGREEMENTS UNDER WHICH CAPACITY DOES NOT NEED TO BE CARRIED TO COVER LOAD?

A Yes. Load that qualifies under Section 70.1.1 of the Open Access Transmission and Energy Markets Tariff for the Midwest Independent System Operator, Inc. ("MISO EMT") as Interruptible Demand does not have to have a designated Network Resource associated with it. This means capacity does not need to be carried for

such loads. I have attached the relevant portions of the MISO EMT as Schedule 2 to my testimony (IIEC Exhibit 2, Schedule 2).

Q SHOULD AMEREN BE REQUIRED TO PROVIDE AN EXEMPTION FROM CAPACITY CHARGES FOR CUSTOMERS WHO TAKE SERVICE UNDER RIDER RTP-L, IF THOSE CUSTOMERS AGREE TO MEET THE MISO INTERRUPTIBLE DEMAND REQUIREMENT?

A Yes. Neither Ameren nor BGS-LRTP suppliers would be required to carry any capacity for the portion of such customer load that qualifies as Interruptible Demand. Without an adjustment, customers would pay for costs of capacity not incurred to serve them.

Q HOW WOULD YOU PROPOSE TO INCORPORATE THOSE CUSTOMERS INTO THE BGS-LRTP CONTRACT, RIDER MV AND RIDER RTP-L?

A The BGS-LRTP contract would be modified such that the portion of customer load that did not qualify as Interruptible Demand would be treated as firm load under the BGS-LRTP contract. The portion of load covered that does qualify as Interruptible Demand would not have a capacity charge associated with it and would be interruptible by MISO pursuant to the MISO EMT. Any MISO penalties incurred due to a failure of a customer to interrupt service when notified would be directly assignable to the customer. Riders MV and RTP-L would be similarly modified to reflect these provisions.

Q DO YOU RECOMMEND THAT AMEREN BE REQUIRED TO IMPLEMENT THIS MODIFICATION TO THE BGS-LRTP CONTRACT AND TO ASSOCIATED PROVISIONS OF RIDERS MV AND RTP-L?

A Yes.

V. DEFAULT SUPPLY SERVICE AVAILABILITY CHARGE

Q PLEASE EXPLAIN AMEREN'S PROPOSED DEFAULT SUPPLY SERVICE AVAILABILITY CHARGE ("DSSAC").

A This is a charge Ameren proposes to apply to Rider RTP-L customers and customers who are eligible to take service under Rider RTP-L but are taking service from a Retail Electric Supplier ("RES"). In the latter case the charge is applied through Ameren's proposed Rider D.

Ameren proposes this charge as a cost recovery mechanism for BGS-LRTP suppliers because those suppliers must be on call to supply both existing Rider RTP-L customers and customers eligible for Rider RTP-L who are being supplied by a RES.

Q HAS AMEREN PROVIDED ANY COST SUPPORT FOR THIS CHARGE?

A No. Ameren has proposed a fixed hard-wired charge of 0.015 cents per kWh which it identifies as a proxy for some amount of the costs to be incurred by suppliers in providing the BGS-LRTP product (Ameren response to Data Request No. EPS 2.02). In addition, Ameren concedes it has no study or analyses to support the charge (Ameren response to Data Request No. IIEC 3-6).

Q DID COMED PROPOSE A SIMILAR CHARGE IN ITS FILING IN DOCKET NO. 05-0159?

A No.

Q IS AMEREN'S PROPOSED DSSAC JUST AND REASONABLE?

A No. Ameren has provided no cost support for the charge. Furthermore, Rider RTP-L has been basically proposed as a default service for customers not taking service from a RES or under Rider BGS-L. As such it is appropriate to reflect any price premium associated with the service in the rates for that service -- not as a non-bypassable charge applicable to customers not currently taking the service. Finally, the proposal does not allow bidders to compete to cover this risk. By this I mean the charge is fixed and not based on what price bidders are willing to accept to cover this risk. Therefore, bidders should simply be permitted to include any premium for this risk in their BGS-LRTP capacity bids.

Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A Yes.

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Qualifications of James R. Dauphinais

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A James R. Dauphinais. My business address is 1215 Fern Ridge Parkway, Suite 208, St. Louis, Missouri 63141.

Q PLEASE STATE YOUR OCCUPATION.

A I am a consultant in the field of public utility regulation with the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I graduated from Hartford State Technical College in 1983 with an Associate's Degree in Electrical Engineering Technology. Subsequent to graduation, I was employed by the Transmission Planning Department of the Northeast Utilities Service Company as an Engineering Technician.

While employed as an Engineering Technician, I completed undergraduate studies at the University of Hartford. I graduated in 1990 with a Bachelor's Degree in Electrical Engineering. Subsequent to graduation, I was promoted to the position of Associate Engineer. Between 1993 and 1994, I completed graduate level courses in the study of power system transients and power system protection through the Engineering Outreach Program of the University of Idaho. By 1996, I had been promoted to the position of Senior Engineer.

In the employment of the Northeast Utilities Service Company, I was responsible for conducting thermal, voltage and stability analyses of the Northeast

Utilities' transmission system to support planning and operating decisions. This involved the use of load flow and power system stability computer simulations. Among the most notable achievements I had in this area include the solution of a transient stability problem near Millstone Nuclear Power Station, and the solution of a small signal (or dynamic) stability problem near Seabrook Nuclear Power Station. In 1993 I was awarded the Chairman's Award, Northeast Utilities' highest employee award, for my work involving stability analysis in the vicinity of Millstone Nuclear Power Station.

From 1990 to 1997, I represented Northeast Utilities on the New England Power Pool Stability Task Force. I also represented Northeast Utilities on several other technical working groups within the New England Power Pool ("NEPOOL") and the Northeast Power Coordinating Council ("NPCC"), including the 1992-1996 New York-New England Transmission Working Group, the Southeastern Massachusetts/Rhode Island Transmission Working Group, the NPCC CPSS-2 Working Group on Extreme Disturbances and the NPCC SS-38 Working Group on Interarea Dynamic Analysis. This latter working group also included participation from a number of ECAR, PJM and VACAR utilities.

In addition to my technical responsibilities, I was also responsible for oversight of the day-to-day administration of Northeast Utilities' Open Access Transmission Tariff. This included the creation of Northeast Utilities' pre-FERC Order No. 889 transmission electronic bulletin board and the coordination of Northeast Utilities' transmission tariff filings prior to and after the issuance of Federal Energy Regulatory Commission ("FERC" or "Commission") FERC Order No. 888. I was also responsible for spearheading the implementation of Northeast Utilities' Open Access Same-Time Information System and Northeast Utilities' Standard of Conduct under FERC Order

No. 889. During this time I represented Northeast Utilities on the Federal Energy Regulatory Commission's "What" Working Group on Real-Time Information Networks. Later I served as Vice Chairman of the NEPOOL OASIS Working Group and Co-Chair of the Joint Transmission Services Information Network Functional Process Committee. I also served for a brief time on the Electric Power Research Institute facilitated "How" Working Group on OASIS and the North American Electric Reliability Council facilitated Commercial Practices Working Group.

In 1997, I joined the firm of Brubaker & Associates, Inc. The firm includes consultants with backgrounds in accounting, engineering, economics, mathematics, computer science and business. Since my employment with the firm, I have presented testimony before the Federal Energy Regulatory Commission in Consumers Energy Company, Docket No. OA96-77-000, Midwest Independent Transmission System Operator, Inc., Docket No. ER98-1438-000, Montana Power Company Docket No. ER98-2382-000, Inquiry Concerning the Commission's Policy on Independent System Operators, Docket No. PL98-5-003, SkyGen Energy LLC v. Southern Company Services, Inc., Docket No. EL00-77-000, Alliance Companies, et al., Docket No. EL02-65-000, et al., Entergy Services, Inc., Docket No. ER01-2201-000, and Remedying Undue Discrimination through Open Access Transmission Service and Standard Electricity Market Design, Docket No. RM01-12-000. I have also presented testimony before the Illinois Commerce Commission, the Indiana Utility Regulatory Commission, the Iowa Utilities Board, the Kentucky Public Service Commission, the Michigan Public Service Commission, the Missouri Public Service Commission, the Public Utility Commission of Texas, the Wisconsin Public Service Commission and various committees of the Missouri State Legislature. I have also participated on behalf of clients in the Southwest Power Pool Congestion

Management System Working Group, the Alliance Market Development Advisory Group and several working groups of the Midwest Independent Transmission System Operator, Inc. ("MISO"), including the Congestion Management Working Group. I am currently an alternate member of the MISO Advisory Committee in the end-use customer sector. In addition to our main office in St. Louis, the firm also has branch offices in Phoenix, Arizona; Chicago, Illinois; Corpus Christi, Texas; and Plano, Texas.