November 21, 2000

Ms. Donna Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Re: Uniform Delivery Service Tariff
Docket No. 00-0494

Dear Ms. Caton:

The Rebuttal Testimony of Robert R. Stephens on behalf of the Illinois Industrial Energy Consumers has been filed electronically with the Clerk of the Illinois Commerce Commission this date. Copies of the foregoing have been provided to parties on the service list.

Sincerely,

Edward C. Fitzhenry

ECF/alc

cc: Service List

Enclosure/29230

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

| | | |
|---|---|---|
| Illinois Commerce Commission<br>On Its Own Motion | ) | |
| -vs- | ) | Docket No. 00-0494 |
| Central Illinois Light Company<br>Central Illinois Public Service Company<br>Commonwealth Edison Company<br>Illinois Power Company<br>Interstate Power Company<br>MidAmerican Energy Company<br>Mt. Carmel Public Utility Co.<br>South Beloit Water, Gas, and Electric Company,<br>and Union Electric Company | ) | |
| Proceeding on the Commission's own Motion concerning delivery services tariffs of all Illinois electric utilities to determine what if any changes should be ordered to promote statewide uniformity of delivery services and related tariffed offerings. | ) | |

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on this 21st day of November, 2000, we have electronically filed with the Illinois Commerce Commission, Rebuttal Testimony of Robert R. Stephens on behalf of the Illinois Industrial Energy Consumers, along with Proof of Service thereon attached.

Edward C. Fitzhenry
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P. O. Box 735
Granite City, IL 62040
(618) 876-8500
ARDC No. 06180218

29230

PROOF OF SERVICE

STATE OF ILLINOIS)
) SS
COUNTY OF MADISON )

I, Edward C. Fitzhenry, being an attorney admitted to practice in the State of Illinois and one of the attorneys for Illinois Industrial Energy Consumers herewith certify that I did on the 21st day of November, 2000, electrically file with the Illinois Commerce Commission, Rebuttal Testimony of Robert R. Stephens on behalf of the Illinois Industrial Energy Consumers, and serve upon the persons identified on the attached service list, both electronically and by depositing same in the United States Mail, in Granite City, Illinois with postage fully prepaid thereon.

_____

Edward C. Fitzhenry
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SUBSCRIBED AND SWORN to me, a Notary Public, on this _____ day of

_____, 2000.

_____

Notary Public

29230

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DOCKET NO. 00-0494

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**STATE OF ILLINOIS**
**ILLINOIS COMMERCE COMMISSION**

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| Illinois Commerce Commission | ) | |
| On Its Own Motion | ) | |
| | ) | |
| vs. | ) | |
| | ) | |
| Central Illinois Light Company | ) | |
| Central Illinois Public Services Company | ) | |
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| concerning delivery services tariffs of all Illinois | ) | |
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| changes should be ordered to promote | ) | |
| statewide uniformity of delivery services and | ) | |
| related tariffed offerings | ) | |

Rebuttal Testimony of

**Robert R. Stephens**

On Behalf of

**Illinois Industrial Energy Consumers**

**November**
**Project 7111**

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**STATE OF ILLINOIS**
**ILLINOIS COMMERCE COMMISSION**

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| Illinois Commerce Commission<br>On Its Own Motion<br><br>vs.<br><br>Central Illinois Light Company<br>Central Illinois Public Services Company<br>Commonwealth Edison Company<br>Illinois Power Company<br>Interstate Power Company<br>MidAmerican Energy Company<br>Mt. Carmel Public Utility Company<br>South Beloit Water, Gas, & Electric Company<br>and Union Electric Company<br><br>Proceeding on the Commission's own motion<br>concerning delivery services tariffs of all Illinois<br>electric utilities to determine what if any<br>changes should be ordered to promote<br>statewide uniformity of delivery services and<br>related tariffed offerings | )<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>) | Docket No. 00-0494 |

**<u>Rebuttal Testimony of Robert R. Stephens</u>**

**Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A Robert R. Stephens; 1215 Fern Ridge Parkway, Suite 208, St. Louis, MO 63141-2000.

**Q BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

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

**Q PLEASE STATE YOUR QUALIFICATIONS AND EXPERIENCE.**

A These are included as Appendix A.

**Q ON WHOSE BEHALF ARE YOU TESTIFYING?**

A I am testifying on behalf of the Illinois Industrial Energy Consumers (IIEC). The IIEC is a group of large industrial customers taking service from virtually every major electric utility in Illinois. IIEC members operate manufacturing facilities or plants in these utility service territories: Central Illinois Light Company (CILCO), Central Illinois Public Service Company (AmerenCIPS), Commonwealth Edison Company (ComEd), Illinois Power Company (IP), MidAmerican Energy Company (MidAmerican) and Union Electric Company (AmerenUE).[1]

**Q WHAT IS IIEC's INTEREST IN THIS CASE?**

A IIEC members are vitally interested in the development of a fully competitive market for electric supply in Illinois. IIEC members believe that, in many circumstances, a fully competitive market will lead to lower energy costs for Illinois industries which, in turn, can lead to an improved economic environment.

IIEC believes that uniformity among the Illinois utilities' tariffs, processes, terms and conditions can facilitate the entrance of new competitors in the market and help enhance competition throughout the State.

Furthermore, for those IIEC members that operate facilities in multiple utility service territories in Illinois, uniformity among utilities' tariffs, processes, terms and conditions will aid in customer understanding and use.

[1] Collectively, AmerenCIPS and AmerenUE will be referred to as "Ameren".

Finally, uniformity in delivery service tariffs promotes consistent regulation by the Illinois Commerce Commission (ICC or Commission). By this I mean, when the Commission enters a decision or ruling pertaining to certain terms and conditions in one utility's tariffs, that decision and understanding can be consistently applied throughout the state. A common understanding of material terms and conditions, and the applicability of delivery services, would benefit all: utilities, customers, marketers/suppliers, the Commission and its Staff.

**Q HAS IIEC HISTORICALLY BEEN A SUPPORTER OF UNIFORMITY AMONG UTILITIES' TARIFFS, PROCESSES, TERMS AND CONDITIONS?**

A Yes. IIEC was extensively involved in Docket No. 98-0680, Investigation Concerning Certain Tariff Provisions Under Section 16-108 of the Public Utilities Act and Other Related Issues, the precursor to the utilities' delivery service tariff filings in early 1999. IIEC participated in the workshops associated with that docket and provided testimony in the evidentiary phase of the case. In its testimony, IIEC offered a pro-forma template for use by the utilities in developing their delivery service tariffs.

Furthermore, IIEC was involved in the delivery service tariff cases of the major Illinois utilities, namely; ComEd, IP, Ameren, and CILCO. In those cases, IIEC presented a recommended uniform Customer Tariff as well as a recommended uniform Supplier Tariff.[2] Ultimately, the Commission did not adopt IIEC's uniform tariffs,

[2] These IIEC recommended uniform tariffs were originally based on, and followed a similar format to, the delivery service tariffs filed by MidAmerican in ICC Docket Nos. 99-0122/99-0130 (consolidated), which, in IIEC's view, were more customer-friendly and understandable than those of the other electric utilities.

although in its orders, the Commission did recognize the potential value of such an approach.

Finally, IIEC participated in the workshops conducted pursuant to the Commission's Initiating Order in the instant case and was a signatory to the stipulation approved in the Commission's Interim Order.

**Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A I wish to comment generally on the direct testimonies in this case and specifically on the direct testimonies of MidAmerican witness Charles B. Rea, ICC Staff witness Peter Lazare, and IP witness Greg M. Gudeman. My failure to address any issues in these witnesses' testimonies, or any other witness's testimony, should not be construed as endorsement of same.

**Q SEVERAL PARTIES HAVE MADE VARYING PROPOSALS AND COMMENTS REGARDING UNIFORM DELIVERY SERVICE TARIFFS. DO YOU HAVE ANY COMMENTS OR RESPONSES?**

A Yes. The proposals have been wide-ranging, from doing essentially nothing at this time to full and complete advocacy for uniform or pro forma delivery service tariffs. Somewhere in the middle is the approach whereby common tariff outlines are being recommended. The question still remains, as indicated even in the caption of this docket, what is the best way to promote statewide uniformity of delivery service tariffs?

**Q SOME WITNESSES HAVE SUGGESTED THE PASSAGE OF TIME WILL PROVIDE THE PARTIES WITH MORE INFORMATION OR KNOWLEDGE AS TO THE PROPRIETY OF MAKING DELIVERY SERVICE TARIFFS UNIFORM. DO YOU AGREE WITH THIS POSITION?**

A No, I do not. The reasons for implementing uniform delivery service tariffs today will be the same reasons tomorrow. Customer understandability, marketer/supplier ease of entrance into the competitive market, and consistent regulation by the Commission are all goals that will not wane with time. I do not doubt there will be changes to delivery service tariffs, because it will be learned that in some respects they are unworkable or do not facilitate the business processes that were originally intended. This expectation is inherent in regulation. But waiting until all that can be known is known, is a prophecy that will never materialize, and the benefits of uniformity will be forgone in the interim.

**Q SOME PARTIES HAVE SUGGESTED THAT COMMON BUSINESS PRACTICES, NOT COMMON TARIFFS, ARE KEY TO PROMOTING CUSTOMER UNDERSTANDING AND DEVELOPMENT OF THE COMPETITIVE MARKET. DO YOU CARE TO RESPOND?**

A Yes. If it is such parties' intention that all the Illinois electric utilities providing delivery services have in place, and are engaging in, common business practices in order to promote competition and to facilitate the provision of delivery services, then uniform terms and conditions with respect to these business practices, will facilitate customer understandability and ease of marketer/supplier entrance into the market. These

common business practices are best described and defined by uniform terms and conditions, and provisions.

**Q THE QUESTION OF COSTS BEING INCURRED BY THE UTILITIES IN IMPLEMENTING UNIFORM DELIVERY SERVICE TARIFFS HAS BEEN RAISED. ARE COST CONSIDERATIONS IMPORTANT?**

A Certainly there are cost considerations. But tariff changes in the face of deregulation are not something new to the Commission, or the utilities, for that matter. The various FERC orders that implemented the deregulation of natural gas introduced transportation rates and services for those customers interested in using the local distribution company's distribution system and buying gas from other suppliers. At that time, new tariffs and rates were required to be filed. No doubt costs were incurred. There were also costs in developing and implementing FERC's pro-forma Open Access Transmission Tariffs on the electric side.

In my view, especially in the early stages of deregulation in the electricity market, tariff changes are not to be unexpected. In fact, the utilities are no doubt readying themselves for residential delivery services. New tariffs for residential delivery services and, potentially, changes to existing non-residential delivery service tariffs will soon be prepared. As I will explain further below, now is the best time to pursue uniform delivery service tariffs. And as is always the case, if the cost prudently incurred in developing uniform delivery service tariffs significantly affects a utility's authorized rate of return, it can seek rate relief.

It is fairly apparent that the Commission intended to approve common business practices among the utilities when it approved their respective delivery service tariffs in 1999. Many of the services and practices are now common among the utilities. For example, procedures for customer switching and the submission of DASRs[3] are similar among utilities. Many other services are driven by statutory requirements and should not differ among utilities. Implementing uniform delivery service tariffs is not about implementing new or radically different business processes; rather it is about conforming these processes to a uniform standard, and describing and administering them in a uniform way.

In conclusion, the implementation of uniform delivery service tariffs is not intended to make, or result in, radical changes to the services currently being provided and, therefore, intolerable costs in this regard should not be incurred. And finally, the timing could not be any better as the Commission is about to embark on considering and approving residential delivery service tariffs.

**<u>Response to MidAmerican Witness Rea</u>**

**Q HAVE YOU REVIEWED THE DIRECT TESTIMONY OF MIDAMERICAN WITNESS REA?**

A Yes, I have. I also reviewed the pro-forma tariffs attached as MidAmerican Exhibit Nos. 1.1 through 1.3.

[3] Direct Access Service Requests.

**Q DO YOU AGREE WITH MR. REA'S DISCUSSION AS TO WHY UNIFORM DELIVERY SERVICE TARIFFS DO NOT CURRENTLY EXIST IN ILLINOIS?**

A Yes, I do. Although uniformity among tariffs has been championed by one party or another from time to time, there has yet to be a proceeding, either formal or informal, in which all parties were striving to develop a uniform tariff. Furthermore, absent a mandate by the Commission that they do so, it appears unlikely that all parties would be willing to participate or devote the time and resources necessary to develop such tariffs.

Other parties have indicated that the current delivery service tariffs are the product of pre-existing tariff structures that have evolved over decades. Such evolution was a natural by-product of events of the prior era, such as consolidation of franchised service territories, development of new rate products, differing cost and operational characteristics, varying frequency of rate examination, etc.

In my opinion, uniformity among tariffs was less important in a fully regulated, monopoly franchised industry. Now, however, with multiple entities operating in utility service territories and customers potentially entering into purchasing arrangements that span multiple utility service territories, uniformity among the tariffs becomes more important.

**Q DO YOU AGREE WITH MR. REA THAT THIS DOCKET IS THE FIRST, AND POSSIBLY THE LAST, GOOD OPPORTUNITY FOR THE COMMISSION TO MAKE A POSITIVE DECISION ON THE USE OF A PRO-FORMA TARIFF?**

A Yes, I do. Although IIEC developed uniform tariffs in the delivery service tariff cases described earlier, and I worked in the drafting of them, I cannot fault the Commission for

choosing not to implement them at that time. Although the utilities in those cases were given the opportunity to provide constructive input to the IIEC uniform tariffs, they opted not to do so. Consequently, the Commission was left with the unenviable choice of whether or not to apply tariffs developed by a single, non-utility, party across all Illinois electric utilities.

In every one of its orders in the delivery service tariff cases for all Illinois electric utilities, the Commission cited procedural time constraints as a contributing factor in not approving IIEC's uniform tariffs. In some of the cases, the Commission otherwise indicated a strong preference for a uniform approach.[4]

Since the time of those orders, the utilities and the Commission have been occupied with implementing direct access. Of necessity, development of uniform delivery service tariffs was put on the back burner. Now that over a year has passed since the beginning of direct access implementation, much more is known by all parties, and given sufficient time, effort and motivation, I am optimistic that a serviceable set of uniform tariffs can be developed.

**Q DO YOU BELIEVE THE UTILITIES ARE MOTIVATED TOWARD DEVELOPMENT OF UNIFORM DELIVERY SERVICE TARIFFS AT THIS TIME?**

A Other than MidAmerican's actions in this case, I have seen nothing that would lead me to believe they are so motivated. If this desirable objective is to be achieved, it appears it will require a mandate of the Commission.

[4] For example, see the Commission's Orders in Docket Nos. 99-0119/99-0131 (Cons.) at 110 – (CILCO), and 99-0120/99-0134 at 155 – (IP).

Should such a mandate be given, and I believe it should, the timing issues outlined in Mr. Rea's testimony are appropriate. As he points out, soon the Commission will be asked to examine and approve delivery service tariffs for residential customers. Once these are approved, the initial development of delivery service tariffs in Illinois will be complete. The practicality and likelihood of uniform tariffs being developed after that point in time is diminished.

**Q DID THE ICC STAFF TAKE ANY POSITION WITH REGARD TO UNIFORM DELIVERY SERVICE TARIFFS IN THE DELIVERY SERVICE TARIFF CASES OF COMED, IP, AMEREN, AND CILCO IN 1999?**

A Yes. Staff witness Eric Schlaf, who has also offered testimony in this case, presented testimonies in the 1999 delivery service tariff proceedings as well. In the CILCO proceeding, Docket Nos. 99-0119 and 99-0131 (consolidated) for example, he stated:

> "As many witnesses have noted in the various delivery services-related proceedings, there is (or can be) a great deal of benefit to a uniform approach to tariff design across utilities. Staff generally agrees with this concept. However, until now, a practical obstacle to uniformity has been the lack of a suitable template. The IIEC tariffs go far in providing that template." (Staff Exhibit CIL-EPS-Reb 3 at 3)

He went on to add that Staff supports the uniform tariff approach, but was not prepared to recommend its adoption to the Commission. The reason Staff would not recommend adoption of IIEC tariffs at that point in time was the need for more time to compare the provisions in the IIEC tariffs with the corresponding provisions of the utilities' tariffs, and the need to contemplate whether there may be legitimate reasons

why a utility's tariff should deviate, in some respect, from the IIEC tariffs or from each other. (Staff Exhibit CIL-EPS-Reb 3 at 4&5)

**Q HOW DO YOU RESPOND?**

A It would appear, at least in 1999, that Staff agreed with the validity of pro-forma or uniform delivery service tariffs. It appears further that Staff has had time to consider the benefits of this approach. It does not appear Staff contends in this case that there are reasons why there should not be uniform delivery service tariffs; at least Staff witness Lazare does not give any clear indications or arguments why the Commission should not consider this approach. Given MidAmerican's has introduction of uniform delivery service tariffs, which also incorporate utility-specific provisions, it would seem that the hurdles to endorsing uniform delivery service tariffs mentioned in Mr. Schlaf's past testimony have now been cleared.

**Q DO YOU AGREE THAT THE PRO-FORMA TARIFFS OFFERED BY MIDAMERICAN FORM AN ADEQUATE SET OF "DEFAULT" TARIFFS ON WHICH TO BASE FUTURE UNIFORM TARIFF DISCUSSIONS?**

A Yes, I do. I have reviewed the pro-forma tariffs put forward by MidAmerican and they appear to be adequate tariffs for going forward in the manner proposed by the utility. MidAmerican's proposed tariffs maintain a number of the structure and understandability features that were appealing to IIEC in MidAmerican's initial tariffs in its delivery service tariff case. Further, MidAmerican has modified them to reflect the decisions of the Commission over time and the provisions stipulated earlier in this case.

**Q DO YOU HAVE AN OPINION AS TO WHETHER THE MIDAMERICAN TARIFFS FAIRLY ENCOMPASS EXISTING DELIVERY SERVICES?**

A Yes. I am quite familiar with the delivery service tariffs of the larger Illinois electric utilities. In some form or fashion, they all address the terms and provisions and conditions as outlined in the MidAmerican proposed tariffs. I would also note MidAmerican has in several instances, made exceptions for those utilities that have slightly different terms and conditions, or provisions.

MidAmerican has done an excellent job in terms of customer understandability and readability. Many of the existing utility delivery service tariffs are cumbersome and difficult to interpret. The MidAmerican tariffs are presented in a format that is logical, and easier to understand and read.

**<u>Response to Staff Witness Lazare</u>**

**Q HAVE YOU REVIEWED THE DIRECT TESTIMONY OF STAFF WITNESS LAZARE?**

A Yes, I have.

**Q DO YOU AGREE WITH MR. LAZARE'S STATEMENT THAT IT IS ESSENTIAL THE TARIFFS BE CLEAR AND STRAIGHTFORWARD SO CUSTOMERS AND SUPPLIERS CAN UNDERSTAND THE RULES GOVERNING THE PROVISION OF DELIVERY SERVICES AND MAKE INFORMED DECISIONS ABOUT THEIR ELECTRIC SERVICE?**

A Yes, I do. In fact, I would amplify his sentiment to include utility personnel, regulators, and potential suppliers among those who should be able to understand these items.

**Q DO YOU BELIEVE A UNIFORM OUTLINE FOR DELIVERY SERVICES TARIFFS SUCH AS THAT PROPOSED BY MR. LAZARE, WILL GREATLY FACILITATE PARTIES' UNDERSTANDING OF THE TARIFFS?**

A Unfortunately, no, I do not, and the outline will not achieve the goals I believe to be important. If I understand Mr. Lazare's proposal correctly, it would essentially re-arrange sections, paragraphs and sentences from the existing tariffs (including, in some instances, the bundled service tariffs) into a pre-defined order. For the most part, it would not necessarily require changes in the provisions of the tariff or the pre-established wording of the provisions. In my experience, the greater hurdle for understanding the utility tariffs has been in the provisions themselves, and the wording of the provisions, not the arrangement within the tariff.

This is not to say that there would be zero benefit from re-arranging the tariffs in a logical, uniform manner. It is just not clear that the benefits of doing so would outweigh the effort required. In this sense, I agree with the penultimate question and answer contained within Interstate Power Company and South Beloit Water, Gas and Electric Company witness Marc Nielsen's direct testimony. Although Mr. Nielsen indicates that it would not require significant effort or cost to re-arrange the tariffs of the companies that he represents, I have seen no such representation from the other utilities that presented direct testimony in this case.

Ultimately, if a significant improvement in the understandability and uniformity of tariffs is to be pursued, it would be better to pursue the MidAmerican approach of a pro-forma tariff than to pursue the tariff outline approach offered by Staff. Furthermore, if the Staff approach were to be approved to the exclusion of the MidAmerican approach, I would recommend the Staff approach not be approved. In other words, while a common tariff outline may be a step in the right direction toward tariff understandability and uniformity, it would be regrettable if the Commission were to forego the entire journey as a result of taking a minimal step.

**<u>Response to IP Witness Gudeman</u>**

**Q HAVE YOU REVIEWED THE DIRECT TESTIMONY OF IP WITNESS GUDEMAN?**

A Yes. In particular, I reviewed Mr. Gudeman's statement pertaining to delivery services tariff simplification. As I understand IP's proposal, it intends to initiate a "rate simplification process" which will be filed as part of its delivery services rate case on or about June 1, 2001. Given the question posed to Mr. Gudeman, I believe he understands "rate simplification" to mean developing a standard tariff structure and layout, perhaps as envisioned by Mr. Lazare.

**Q DO YOU HAVE ANY RESPONSE?**

A Yes. As I explained in response to Mr. Lazare, the rate simplification approach suggested by IP does not go far enough. It would seem, though, IP does recognize benefits to moving toward uniformity by virtue of even this concession.

Finally, the June 1, 2001 date outlined by Mr. Gudeman would be an acceptable point in time by which to have uniform delivery service tariffs. That is, if June 1, 2001 is when IP intends to file its next delivery services rate case, filing uniform delivery service tariffs at that time would be appropriate as well. This would require an acceleration of the procedural schedule outlined by MidAmerican witness Rea.

**Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

A Yes, it does.

**Appendix A**

## Qualifications of Robert R. Stephens

**Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A Robert R. Stephens. My business mailing address is P. O. Box 412000, 1215 Fern Ridge Parkway, Suite 208, St. Louis, Missouri 63141-2000.

**Q PLEASE STATE YOUR OCCUPATION.**

A I am a consultant in the field of public utility regulation with the firm of Brubaker & Associates, Inc., energy, economic and regulatory consultants. My title is Senior Consultant.

**Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

A I graduated from Southern Illinois University at Carbondale in 1984 with a Bachelor of Science degree in Engineering. During college, I was employed by Central Illinois Public Service Company in the Gas Department. Upon graduation, I accepted a position as a Mechanical Engineer at the Illinois Department of Energy and Natural Resources. In the summer of 1986, I accepted a position as Energy Planner with City Water, Light and Power, a municipal electric and water utility in Springfield, Illinois. My duties centered on integrated resource planning and the design and administration of load management programs.

From July 1989 to June 1994, I was employed as a Senior Economic Analyst in the Planning and Operations Department of the Staff of the ICC. In this position, I reviewed utility filings and prepared various reports and testimony for use by the ICC. From June 1994 to August 1997, I worked directly with a Commissioner as an Executive Assistant. In this role, I provided technical and policy analyses on a broad spectrum of issues related to the electric, gas, telecommunications and water utility industries.

In May 1996, I graduated from the University of Illinois at Springfield with a Master of Business Administration degree.

In August 1997, I joined Brubaker & Associates, Inc. as a Consultant. Since that time, I have participated in the analysis of various utility rate and restructuring matters in several states and the evaluation of power supply proposals for clients.

The firm of Brubaker & Associates, Inc. provides consulting services in the field of energy procurement and public utility regulation to many clients, including large industrial and institutional customers, some utilities, and on occasion, state regulatory agencies. More specifically, we provide analysis of energy procurement options based on consideration of prices and reliability as related to the needs of the client; prepare rate, feasibility, economic and cost of service studies relating to energy and utility services; prepare depreciation and feasibility studies relating to utility service; assist in contract negotiations for utility services; and provide technical support to legislative activities.

In addition to our main office in St. Louis, the firm also has branch offices in Kerrville, Texas; Plano, Texas; Denver, Colorado; and Chicago, Illinois.