

III. Persons Qualified pursuant to Paragraph 3(e) and Paragraph 10.

I have read the Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 10.

By: Michael Gormy 3/2/05
Signature & Printed Date

Michael Gormy

By: _____
Signature & Printed Date

By: _____
Signature & Printed Date

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III. Persons Qualified pursuant to Paragraph 3(e) and Paragraph 10.

I have read the Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 10.

By: James Selecky
Signature & Printed
JAMES SELECKY

MARCH 7, 2005
Date

By: Kathryn E. Iverson
Signature & Printed
KATHRYN IVERSON

MARCH 8, 2005
Date

By: _____
Signature & Printed

Date

By: _____
Signature & Printed

Date

BAI is a leading advisor in the rapidly changing regulated and competitive energy markets. We create value for our clients by developing and helping to implement creative solutions that reduce or avoid energy costs. Because BAI does not own or market a commodity, we can provide the best expertise and most objective advice for our clients.

BAI professionals have been in practice for more than 25 years. Our clientele consists of industrial, commercial and institutional users of electricity, natural gas, coal, fuel oil, steam, water and wastewater services provided by hundreds of utilities throughout North America.



BAI is organized in two groups that work together to advise clients.

Energy, Economic, and Regulatory Consulting

We provide consulting services in the economic, technical, accounting, and financial aspects of utility rates. BAI professionals have participated on behalf of clients in thousands of utility regulatory and legal proceedings involving most of the major electric utilities in the United States, numerous natural gas transmission and distribution companies and many water and wastewater utilities. We are active participants in the electric utility transformation to competition and are working with clients in many key states to develop customer choice programs.



Energy Procurement and Management

We provide energy procurement and management services such as the development of energy purchasing strategies, energy usage analysis, price forecasts, preparation of request for proposals, contract negotiations and daily management of energy consumption. BAI professionals have negotiated with many energy providers on behalf of clients and have been successful in reducing client energy costs. The procurement and management professionals have many years of experience in hands-on purchasing of electricity, natural gas, coal and fuel oil. We augment our clients' P&M capabilities to enable them to take advantage of competitive opportunities.

*Partial List of Current Clients**

Air Liquide America Corporation	Georgia-Pacific Corporation
Air Products and Chemicals, Inc.	IMC Phosphates Company
Alcan Aluminum Corporation	International Paper Company
Anheuser-Busch Companies, Inc.	Kennecott Corporation
Apache Corporation	Kimberly-Clark Corporation
Archer Daniels Midland Company	MeadWestvaco Corporation
Barrick Goldstrike Mines, Inc.	Monsanto Company
BASF Corporation	National Steel Corporation
The Boeing Company	Nestlé Purina PetCare Company
BP	Occidental Chemical Corporation
Celanese, Ltd.	Olin Corporation
Chevron Phillips Chemical Company	Owens-Illinois, Inc.
Chevron Texaco	PPG Industries, Inc.
Colonial Pipeline Company	Praxair, Inc.
DaimlerChrysler Corporation	Procter & Gamble Company
The Dow Chemical Company	Solutia, Inc.
DuPont Company	Temple-Inland Forest Products Corp.
Explorer Pipeline Company	Texas Medical Center
ExxonMobil	U. S. Navy
Ford Motor Company	University of Illinois
General Motors Corporation	

* Representative sample from over 500 total

Scope of Activities

► *Competitive Energy Strategies*

Electric industry restructuring not only presents many opportunities but also contains potential “traps” that must be avoided. BAI is actively involved in most of the key states and is thoroughly familiar with the technical and political issues of restructuring and customer choice.

We are well positioned to help individual clients develop practical and cost-effective strategies for dealing with this rapidly changing environment.

► *Energy Procurement and Management*

Energy savings do not happen automatically. Clients need both the staff and a working knowledge of complex issues and options to successfully procure and manage energy in both regulated and competitive markets.

BAI professionals have this experience and can augment a client’s resources by offering hands-on purchasing assistance in electricity, natural gas, coal and fuel oil. As we do not own or market a commodity, we are a client’s trusted and objective energy advisor.

► *Contract Negotiations*

Contracts with energy suppliers will replace traditional monopoly services. Successful contract negotiations require current information and good bargaining skills. BAI helps clients identify objectives and formulate a procurement strategy, analyze energy usage, prepare RFPs, evaluate offers, and develop the technical, economic and strategic data required to formulate and implement feasible options. BAI professionals are involved in both the analytical and strategic phases of contracting and in the bargaining process to secure favorable purchase and sales contracts.

► *Legislation and Public Policy*

BAI professionals apply their extensive knowledge of regulatory issues to prepare special studies and to support legislative coalitions seeking to implement comprehensive restructuring legislation. These activities include policy analysis, preparing white papers, drafting and analyzing proposed legislation, strategy development and presenting expert testimony.



Scope of Activities

► *Special Studies and Reports*

To support BAI's other services and to address a wide variety of other needs, we provide special studies for clients including:

- Analyses of energy usage to determine trends and develop options to achieve cost savings
- Siting studies for new facilities
- Energy price surveys
- Legislative analysis
- Reports on electricity restructuring activities

► *Forecasting*

Energy price forecasts are a necessary element in energy management, procurement and investment decisions for new and existing self-generation facilities. BAI provides clients with timely surveys and forecasts of energy prices nationwide and with comprehensive evaluations for selecting potential plant sites.

► *Regulatory and Litigation Support*

Many sectors of the energy industry will remain regulated. The regulatory process involves issues of accounting, economics, engineering, finance and law. We work closely with the client and legal counsel to develop effective strategy and to present persuasive expert testimony before state and federal regulators.

BAI strives for "win-win" resolutions for clients. However, some matters cannot be resolved without litigation. BAI professionals apply their knowledge and experience to support litigation. This includes discovery, depositions, trial preparation, analysis and expert testimony.

► *Seminars*

BAI presents an Electricity Fundamentals Seminar and an Electricity Buyers' Forum. These seminars address such topics as utility accounting and finance, cost of service, rate design, transmission and ancillary services, negotiating special rates, the transition to customer choice and how to buy electricity. We also develop and present specialized seminars tailored to the needs of individual clients. These can be designed to deal with general topics or to focus on specific client issues.



Representative Projects

► *Energy Procurement and Management*

- Develop and analyze energy purchasing strategies for electricity, natural gas, coal and fuel oil
- Negotiate procurement contracts for new and existing facilities, including load aggregation
- Assist consumers to secure and manage their own gas supply
- Identify and evaluate alternate supply arrangements
- Prepare and evaluate RFPs for competitive sourcing of energy
- Develop comparative energy price studies for negotiation strategies and plant siting decisions
- Prepare economic evaluations of power assets
- Develop and manage an electricity aggregation group
- Conduct bill audits and energy cost reduction assessments

► *Electricity Markets*

- Facilitate industry restructuring
- Prepare market price forecasts
- Prepare economic evaluations of stranded costs and securitization
- Present expert testimony before regulatory commissions and in legislative and judicial settings

► *Electric Transmission*

- Evaluate open access tariffs for transmission and ancillary services
- Participate in the formation of ISOs/Regional Transmission Organizations
- Conduct load flow studies
- Analyze ATC and other information posted on the OASIS
- Present expert testimony before regulatory commissions

► *Natural Gas*

- Develop hedging strategies
- Negotiate gas storage terms and charges
- Provide contract/rate interpretation
- Present expert testimony before regulatory commissions

Representative Projects

► *Natural Gas and Oil Pipelines*

- Negotiate transportation contracts
- Develop transportation and storage rate designs
- Identify and evaluate alternative supply arrangements
- Present expert testimony before regulatory commissions

► *Water / Wastewater*

- Negotiate supply contracts
- Evaluate privately owned companies
- Develop rate design for consumers
- Present expert testimony before state regulators

► *Self-Generation*

- Evaluate the economics of alternative projects
- Forecast market prices
- Negotiate contracts with developers and other project participants
- Identify alternate suppliers of standby power
- Negotiate contracts for standby power including rates, terms and conditions

