

**UE 178 / Joint Stipulating Parties/ 200
Owings – Ball - Tinker – Blumenthal - Jenks**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

**UE 178
2006 SB 408 Automatic Adjustment Clause**

OREGON PUBLIC UTILITY COMMISSION STAFF
PORTLAND GENERAL ELECTRIC COMPANY
CITIZENS' UTILITY BOARD OF OREGON
THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

**JOINT TESTIMONY AND EXHIBITS IN
SUPPORT OF STIPULATION**

February 1, 2008

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

2 **A.** My name is Carla Owings. I am a Senior Revenue Requirement Analyst in the
3 Rates and Tariffs section of the Electric and Natural Gas Division of the Public
4 Utility Commission of Oregon (“OPUC”) Staff. My business address is 550 Capitol
5 Street NE, Suite 215, Salem, Oregon 97301-2551. My qualifications appear in Joint
6 Stipulating Parties Exhibit 210.

7 My name is Dustin Ball. I am a Senior Financial Analyst employed by the
8 OPUC. My business address is 550 Capitol Street NE, Suite 215, Salem, Oregon
9 97301-2551. My qualifications appear in Joint Stipulating Parties Exhibit 211.

10 My name is Jay Tinker. I am a Project Manager for Portland General Electric
11 Company (“PGE” or the “Company”). My business address is 121 SW Salmon
12 Street, Portland, Oregon 97204. My qualifications are set forth in PGE/100,
13 Tamlyn-Tinker/5.

14 My name is Ellen Blumenthal. I am a consultant for the Industrial Customers of
15 Northwest Utilities (“ICNU”). My business address is 13517 Queen Johana Court,
16 Corpus Christi, Texas 78418. My qualifications appear in Joint Stipulating Parties
17 Exhibit 212.

18 My name is Bob Jenks. I am Executive Director for the Citizens' Utility Board
19 (“CUB”). My business address is 610 SW Broadway, Suite 308, Portland, Oregon
20 97205. My qualifications appear in Joint Stipulating Parties Exhibit 213.

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

22 **A.** Staff, PGE, ICNU and CUB, hereinafter referred to as the Stipulating Parties, come
23 together to provide this testimony in support of the Stipulation filed in Docket

1 No. UE 178, regarding PGE's tax filing as it relates to Senate Bill 408 ("SB 408"),
2 codified at ORS 757.267 and 757.268, and implemented by OAR 860-022-0041.
3 Pursuant to ORS 757.268 and OAR 860-022-0041, on October 15, 2007, PGE filed
4 its tax report for calendar-years 2004, 2005 and 2006 (the "Tax Report"), and tariff
5 revision sheets filed as Advice No. 07-24. On November 7, 2007, Chief ALJ Grant
6 entered a procedural schedule for the docket. Pursuant to the procedural schedule,
7 PGE filed opening testimony on December 3, 2007. On December 19, 2007, Staff
8 and ICNU filed issues lists and initial findings. In connection with its initial findings
9 ("Staff's Initial Findings"), Staff requested that PGE amend its tax report for
10 calendar-year 2006 to reflect Staff's recommendations. ICNU's consultant worked
11 with Staff and agreed with Staff's Initial Findings. In response to Staff's request,
12 PGE filed an amended 2006 tax report for calendar-year 2006 on January 2, 2008,
13 reflecting some but not all of Staff's recommendations (the "Amended 2006 Tax
14 Report"). Settlement conferences were held on January 7, 2008, and January 17,
15 2008. As a result of those settlement discussions, the Stipulating Parties have
16 agreed to the terms of the Stipulation and to submit the Stipulation to the
17 Commission. The Stipulating Parties request that the Commission issue an order
18 approving the Stipulation and implementing its terms.

19 **Q. DO ALL PARTIES AGREE TO PGE'S TAX FILING BASED ON ITS REVIEW?**

20 **A.** For the purposes of settlement, the Stipulating Parties agree only that the net
21 refund amount of \$37.2 million for federal, state and local taxes for calendar-year
22 2006, as reflected in the Amended 2006 Tax Report, satisfies the methodologies
23 as currently written in OAR 860-022-0041. The Stipulating Parties do not agree,

1 however, whether the methodologies set forth in OAR 860-022-0041 are
2 consistent with the goals of ORS 757.268. The Stipulating Parties reserve the
3 right to challenge the methodologies in OAR 860-022-0041 in another proceeding.

4 Although the Stipulating Parties have agreed to the outcome of a refund due
5 to ratepayers, the Stipulating Parties disagree on some of the revisions
6 recommended in Staff’s Initial Findings. In Staff’s Initial Findings, Staff requested
7 that the Company: (a) use the results of operations in developing the ratios
8 required by ORS 757.268; (b) use the Oregon Schedule AP as the source data for
9 Lines 6-8 of Page 2 and Lines 7-9 of Page 4 of Staff’s Template; (c) apply the
10 “greater of” determination on an annual basis, not to each of the two partial years;
11 (d) split the stand-alone liabilities from the results of operations between the two
12 partial years; (e) remove Schedule M adjustments for the SB 408 accrual as well
13 as regulatory disallowances prior to applying the Schedule Ms for purposes of
14 calculating the Stand-alone liability; (f) remove the effect of the normalizing
15 adjustments from the calculation of the depreciation amount to be added back on
16 Page 6 of Staff’s Template under the Stand-alone and Consolidated methods;
17 (g) revise Page 1 of the template to include relevant portions of the tax report for
18 Lines 2 and 3; (h) correct a mathematical error on Page 7c of the Staff Template;
19 and (i) calculate deferred tax amounts reflected on Page 6 of the Staff Template
20 based on actual book-tax differences rather than estimated differences.

21 **Q. DID PGE AGREE TO PERFORM ANY OF THE ABOVE MENTIONED**
22 **REVISIONS REQUESTED BY STAFF?**

1 **A.** Yes. PGE agreed to revise items (f), (g), (h) and (i) above and has provided Staff
2 with a revised template reflecting such revisions. The remaining Staff
3 recommendations items, (a), (b), (c), (d) and (e), remain unresolved. However,
4 the Stipulating Parties have agreed, as part of the Stipulation, that these
5 unresolved issues do not affect the reasonableness of the stipulated overall refund
6 amount and need not be resolved in this docket. The Stipulating Parties expect
7 that some or all of these unresolved issues will be addressed in a future
8 rulemaking proceeding.

9 **Q. ARE THERE ANY OTHER ISSUES NOT RESOLVED BY THE STIPULATION?**

10 **A.** Yes. There are two other unresolved issues. First, PGE has proposed to amortize
11 the refund amount over two years. ICNU opposes this amortization schedule and
12 believes the refund should occur over one year. The Stipulating Parties wish to
13 preserve their respective positions on this issue and address this issue in briefs filed
14 later in this docket. Second, PGE has raised constitutional concerns regarding the
15 treatment of the tax benefits from the sale of a non-utility asset (an LM 6000 turbine)
16 in the Tax Report and the Amended 2006 Tax Report. Removal of the tax benefit
17 from the LM 6000 sale from the Amended 2006 Tax Report would reduce the refund
18 amount by approximately \$4.9 million, resulting in a net refund amount of
19 \$32.3 million. PGE supports such an adjustment. The other Stipulating Parties
20 oppose it. The Stipulating Parties will address this issue in briefs filed later in this
21 docket.

22 **Q. DO YOU HAVE ANYTHING FURTHER ON THESE ISSUES OR ANY OTHER**
23 **ISSUES?**

1 **A. No.**

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3 **A. Yes.**

LIST OF EXHIBITS

Joint Stipulating Parties Exhibit No.	Description
210	Qualifications of Carla Owings
211	Qualifications of Dustin Ball
212	Qualifications of Ellen Blumenthal
213	Qualifications of Bob Jenks

WITNESS QUALIFICATION STATEMENT

NAME: Carla M. Owings

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Utility Analyst/Revenue Requirement/Rates and Regulation

ADDRESS: 550 Capitol Street NE Suite 215
Salem, Oregon 97301-2115.

EDUCATION: Professional Accounting Degree
Trend College of Business 1983

EXPERIENCE: I have been employed by the Public Utility Commission of Oregon since April of 2001. I am the Senior Utility Analyst for revenue requirement for the Rates and Regulation Division of the Utility Program. Current responsibilities include leading research and providing technical support on a wide range of policy issues for electric, telecommunications, and gas utilities.

From September 1994 to April 2001, I worked for the Oregon Department of Revenue as a Senior Industrial/Utility Appraiser. I was responsible for the valuation of large industrial properties as well as utility companies throughout the State of Oregon.

I have testified in behalf of the Public Utility Commission in Docket Nos. UE 180, UM 1234, UE 167, UE 180, UE 188, UM 1234, UM 1261, UM 1271 and UG 171.

OTHER EXPERIENCE: I received my certification from the National Association of State Boards of Accountancy in the Principles of Public Utilities Operations and Management in March of 1997. I have attended the Institute of Public Utilities sponsored by the National Association of Regulatory Utility Commissioners at Michigan State University in August of 2002 and the College of Business Administration and Economics at New Mexico State University's Center for Public Utilities in May of 2004.

In 2005, I attended the National Association of Regulatory Utility Commissioners Advanced Course at Michigan State University. I worked for seven years for the Oregon State Department of Revenue as a Senior Utility and Industrial Appraiser.

WITNESS QUALIFICATION STATEMENT

NAME: Dustin Ball

EMPLOYER: Public Utility Commission Of Oregon

TITLE: Senior Financial Analyst, Economic Research & Financial Analysis Division

ADDRESS: 550 Capitol Street NE suite 215
Salem, Oregon 97301-2115.

EDUCATION: Bachelor of Science, Business focusing in Accounting,
Western Oregon University (2003)

EXPERIENCE: Employed with the Oregon Public Utility Commission since August 2007. I am a Senior Financial Analyst for the Economic Research & Financial Analysis Division.

Employed by the Oregon Real Estate Agency as a Financial Investigator in the Regulations Division from January 2006 to August 2007.

Employed by the Oregon Department of Revenue as an Income Tax Auditor, in the Personal Tax and Compliance Section from January 2004 to January 2007.

Licensed Tax Consultant in the State of Oregon.

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Senior Project Manager

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EDUCATION: University of Texas at Austin
Bachelor of Arts in Journalism, 1975
Certified Public Accountant in Texas, February 1977

PROFESSIONAL MEMBERSHIPS:
American Institute of Certified Public Accountants
Texas Society of Certified Public Accountants

EXPERIENCE:

GDS Associates, Inc., March 2002 to present

Senior Project Manager of GDS Associates, Inc., Engineers and Consultants, Corpus Christi, Texas. Provides financial analysis for natural gas and electric markets; assists consumers in acquiring power needs in the competitive markets; provides analysis in gas, electric, telephone and water utility rate increase filings and presents expert testimony in regulatory proceedings on behalf of interveners. Issues addressed in testimony include all aspects of revenue requirement determination.

Independent Consultant, June 1982 to February 2002

Financial analysis for natural gas and electric markets; Provided analysis and expert witness revenue requirements testimony in gas, electric, telephone and water utility rate increase applications on behalf of intervenors.

C. H. Guernsey & Co., Consulting Engineers & Architects, November 1980 - June 1982

Title: Regulatory Accountant and Financial Analyst
Duties included preparation of financial and accounting aspects of rate filings for electric cooperatives for presentation before the Public Utility Commission of Texas. Testified as an expert witness on accounting matters before the Public Utility Commission of Texas. Advised electric cooperatives on accounting and regulatory matters. Participated in review of rate increase applications of investor-owned utilities and prepared and presented expert witness testimony based on such review. Participated in special projects such as cost-benefit analyses related to owner participation in power plants and alternative regulatory treatments for nuclear generating stations.

Public Utility Commission of Texas, May 1977 - November 1980

Title: Chief Accountant III
Duties included providing expert witness testimony in investor-owned and cooperative telephone, electric and water utility rate cases filed with the Commission in the following areas: Fuel and purchased power, Operation and maintenance expenses, Federal income taxes, Taxes other than federal income taxes, Affiliate transactions, Oil and gas exploration and development. Reviewed the books and business records of public utilities to determine the reasonableness of rate requests. Reviewed public utilities' implementation of fuel adjustment clause and other rate schedules to determine compliance with tariffs approved by Commission.

Sample List of Testimony Filed and Other Utility Projects:

United Water Connecticut, Inc. Application to Change Rates, Prepare rate filing and testimony. Connecticut Department of Public Utilities Docket No. 07-05-44, June 2007.

Application of AEP Texas Central Company for Authority to Change Rates, Texas Public Utility Commission Docket No. 33309, March 2007.

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Application of AEP Texas North Company for Authority to Change Rates, Texas Public Utility Commission Docket No. 33310, March 2007.

Staff's Petition for a Reallocation of Stranded Costs Pursuant to PURA Sec. 139.253(f), Texas PUC Docket No. 32795, August 2006.

Application of Bryan Texas Utilities for Interim Update of Wholesale Transmission Rates Pursuant to Substantive Rule 25.192(g)(1), Texas Public Utility Commission Docket No. 30925, March 2005; Docket No. 32958, June 2006.

Application of AEP Texas Central Company for a Financing Order, Texas Public Utility Commission Docket No. 32475, April 2006.

Application of Texas-New Mexico Power Company to Establish a Competition Transition Charge Pursuant to P.U.C. SUBST. R. 25.263(n), Texas Public Utility Commission Docket No. 31994, March 2006.

Application of the Electric Reliability Council of Texas for Approval of the ERCOT System Administration Fee, Texas Public Utility Commission Docket No. 31824, January 2006.

Application of Entergy Gulf States, Inc. for Recovery of Transition to Competition Costs, Texas Public Utility Commission Docket No. 31544, January 2006.

Application of Sharyland Utilities, L.P. for Interim Update of Wholesale Transmission Rates Pursuant to Substantive Rule 25.192(g)(1), Texas Public Utility Commission Docket No. 31826, October 2005.

Two management audits of the Sempra Energy utilities' compliance with federal and state affiliate rules. October 2005

Advise Nebraska Public Service Commission on gas utility regulatory matters. 2003 to present.

Petition to Inquire into the Reasonableness of the Rates and Services of Cap Rock Energy Corporation, Texas Public Utility Commission Docket No. 28813 on behalf of Pioneer Energy, August 2004.

Application of CenterPoint Energy Houston Electric, LLC, Texas Genco, LP, and Reliant Energy Retail Services, LLC to Determine Stranded Costs and Other Balances, Texas PUC Docket No. 29526, on behalf of the City of Houston and the Coalition of Cities, June 2004.

Application of AEP Texas Central Company for Authority to Change Rates, Texas PUC Docket No. 28840, on behalf of the Coalition of Commercial Ratepayers, February 2004.

Application of the Electric Reliability Council of Texas to Change the ERCOT System Administrative Fee, Texas PUC Docket No. 28832, on behalf of the Office of Public Utility Counsel, January 2004.

TXU Gas Company Statement of Intent to Change Rates in the Company's Statewide Gas Utility System, Texas Railroad Commission Docket No. 9400, on behalf of Allied Coalition of Cities, December 2003.

Application of Southwestern Electric Power Company for Authority to Reconcile Fuel Costs, Texas PUC Docket No. 28045, on behalf of the Cities Served, November 2003.

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Kansas Gas Service, a Division of Oneok, Inc. Application to Change Natural Gas Rates, Kansas Corporation Commission Docket 03-KGSG-602-RTS, on behalf of Unified School District No. 259, July 2003

Application of AEP Texas Central Company for Authority to Reconcile Fuel Costs, Texas PUC Docket No. 27035 on behalf of Affected Cities, April 2003.

Application of West Texas Utilities Company for Authority to Reconcile Fuel Costs, Texas PUC Docket No. 26000 on behalf of the Office of Public Utility Counsel, October 2002.

TXU Gas Distribution Application to Change Distribution Rates in its South Region on behalf of affected Texas municipalities, Fall 2002.

Application of Ernest G. Johnson, Director of the Public Utility Division, Oklahoma Corporation Commission to Review the Rates, Charges, Services and Service Terms of Oklahoma Gas & Electric Company and all Affiliated Companies and any Affiliate or Non-Affiliate Transaction Relevant to Such Inquiry, Oklahoma Corporation Commission Cause No. PUD 200100455 on behalf of the Oklahoma Attorney General, June 2002.

Petition of the Electric Reliability Council of Texas for Approval of the ERCOT Administrative Fee, Texas PUC Docket No. 23320 on behalf of Austin Energy, May 2002.

Texas-New Mexico Power Company Application for Approval of Unbundled Cost of Service Rates, Texas PUC Docket No. 22349 on behalf of the Office of Public Utility Counsel, January 2001.

TXU Lone Star Pipeline Application to Change the City Gate Rate, Texas Railroad Commission Docket No. 8976 on behalf of the Aligned Cities, January 2000.

Reliant Energy HL&P Application for Approval of Unbundled Cost of Service Rates, Texas PUC Docket No. 22355 on behalf of the City of Houston and the Coalition of Cities, December 2000.

TXU Electric Company Application for Approval of Unbundled Cost of Service Rates, Texas PUC Docket No. 22350 on behalf of the Office of Public Utility Counsel, October 2000.

Santa Fe Pipeline Partnership, L.P., FERC Docket No. OR92-8-000, *et al* on behalf of Refinery Holding Company, L.P., January 1996.

Peoples Natural Gas Company, Rate Area Three on behalf of the Nebraska Municipalities Served, December 1995.

Compliance review of Southern Union Gas Company's fuel cost recovery in the City of El Paso on behalf of the City of El Paso, Texas, Spring 1995.

Houston Lighting and Power Company, Texas PUC Docket No. 12065 on behalf of Office of Public Utility Counsel, November 1994.

El Paso Electric Company, Texas PUC Docket No. 12700 on behalf of Office of Public Utility Counsel and The City of El Paso, Texas, June 1994.

Application of Central and South West Corporation and El Paso Electric Company For Approval of Acquisition, PUC Docket No. 12700 on behalf of Office of Public Utility Counsel, June 1994.

El Paso Electric Company, Public Utility Regulation Board of The City of El Paso, Texas on behalf of the City of El Paso, Texas, May 1994.

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Kansas Pipeline Partnership and Kansas Natural Partnership, Kansas Docket No. 190,362-U on behalf of Citizens' Utility Ratepayer Board, September 1994.

KN Energy, Inc., Kansas Corporation Commission Docket No. 186,363-U on behalf of Citizens' Utility Ratepayer Board, September 1993.

City of Austin Water and Wastewater Utility before City Counsel on behalf of residential and small commercial ratepayers, October 1993.

Texas Utilities Electric Company, Texas PUC Docket No. 11735 on behalf of Certain Cities Served by Texas Utilities Electric Company, September 1993.

Complaint of General Counsel against Cherokee County Electric Cooperative, Inc. regarding application of Cherokee's switchover tariff, Texas PUC Docket No. 11351, on behalf of the Cooperative, June 1993.

Texas Utilities Electric Company, Texas PUC Docket No. 11735 on behalf of the Office of Public Utility Counsel, April 1993.

Application of Entergy Corporation and GSU for Sale, Transfer or Merger, Texas PUC Docket No. 11292, on behalf of Office of Public Utility Counsel, January 1993.

Peoples Natural Gas Company, Kansas Corporation Commission Docket No. 180,416-U, on behalf of the Citizens' Utility Ratepayer Board, August 1992.

Kansas Public Service Company, Kansas Corporation Commission Docket No. 179,484-U, on behalf of the Citizens' Utility Ratepayer Board, April 1992.

Complaint of NBC Telecommunications, Inc. against Southwestern Bell Telephone Company, Texas PUC Docket No. 10762, on behalf of complainant, September 1992.

Central Texas Telephone Company, Texas PUC Docket No. 9981, on behalf of the Office of Public Utility Counsel, December 1991.

Texas-New Mexico Power Company, Texas PUC Docket No. 10200, on behalf of the Office of Public Utility Counsel, December 1991.

Greeley Gas Company, Kansas Corporation Commission Docket No. 177,142-U, on behalf of the Citizens' Utility Ratepayers Board, November 1991.

Peoples Natural Gas Company, Rate Areas Two and Three on behalf of the Nebraska Municipalities Served, November 1991.

Southern Union Gas Company El Paso Service Area, Public Utility Regulatory Board of El Paso on behalf of the City of El Paso, November 1991.

City of Round Rock, Texas Water Commission Docket No. 8600-M, on behalf of Brushy Creek Municipal Utility District, October 1991.

El Paso Electric Company, Texas PUC Docket No. 9945, on behalf of the Office of Public Utility Counsel, April 1991.

Houston Lighting & Power Company, Texas PUC Docket No. 9850, on behalf of the Office of Public Utility Counsel, February 1991.

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Greeley Gas Company, Kansas Corporation Commission Docket No. 170,588-U, on behalf of the Citizens' Utility Ratepayers Board, August 1990.

Rio Grande Valley Gas Company, Texas Railroad Commission Docket No. 7604, Consolidated, on behalf of the Intervener Cities, May 1990.

Southern Union Gas Company El Paso Service Area, Public Utility Regulatory Board of El Paso on behalf of the City of El Paso, October 1990.

Texas Utilities Electric Company, Texas PUC Docket No. 9300, on behalf of the Intervener Cities, April 1990.

Gulf States Utilities Company, Texas PUC Docket No. 8702, on behalf of the Intervener Cities, July 1989.

Central Power & Light Company, Texas PUC Docket No. 8646, on behalf of the Intervener Cities, June 1989.

Lower Colorado River Authority, Texas PUC Docket No. 8400, on behalf of several wholesale customers, February 1989.

Lower Colorado River Authority, Texas PUC Docket No. 8032, on behalf of several wholesale customers, June 1988.

Tawakoni Water Utility Corporation, Texas Water Commission Docket No. 7368-R, on behalf of Tawakoni Water Consumers Association, January 1988.

Hill Country Waterworks Company, Texas Water Commission Docket No. 172-W, on behalf of the City of Hill Country Village and the City of Hollywood Park, July 1987.

Detroit Edison Company, Michigan PSC, Case No. U-8683, on behalf of North Star Steel Michigan, May 1987.

Gulf States Utilities Company, Texas PUC Docket No. 7195, on behalf of North Star Steel Texas, January 1987.

Rio Grande Valley Gas Company, Texas Railroad Commission Docket No. 4717, 1984 and Docket No. 3858, on behalf of the Rio Grande Valley Cities, March 1982.

Mustang Telephone Company, Texas PUC Docket No. 6635, July 1986, on behalf of intervener cities.

Lower Colorado River Authority, Texas PUC Docket No. 6027, on behalf of several wholesale customers, March 1985.

Fannin County Electric Cooperative, Texas PUC Docket No. 4940, on behalf of the Cooperative.

Dewitt County Electric Cooperative, Texas PUC Docket No. 4919, on behalf of the Cooperative.

Houston Lighting and Power Company, Texas PUC Docket No. 4540, August 1982, on behalf of the City of Houston.

Houston Lighting & Power Company, Texas PUC Docket No. 3320, September 1980, on behalf of the Texas Public Utility Commission.

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Inquiry by Public Utility Commission of Texas into Certain Affiliate transactions of Texas Electric Service Company, Texas Power and Light Company and Dallas Power and Light Company, Texas PUC Docket Nos. 1517, 1813 and 1903, February 1979, on behalf of the Texas Public Utility Commission.

WITNESS QUALIFICATION STATEMENT

NAME: Bob Jenks

EMPLOYER: Citizens' Utility Board of Oregon

TITLE: Executive Director

ADDRESS: 610 SW Broadway, Suite 308
Portland, OR 97205

EDUCATION: Bachelor of Science, Economics
Willamette University, Salem, OR

EXPERIENCE: Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, and UM 1209. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates.

Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

MEMBERSHIP: National Association of State Utility Consumer Advocates
Board of Directors, OSPIRG Citizen Lobby
Telecommunications Policy Committee, Consumer Federation of America
Electricity Policy Committee, Consumer Federation of America