

AMPARO NIETO

Director

BRG

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SUMMARY

Ms. Nieto is an energy economist with over 30 years of international advisory and testifying experience. She has testified before many state commissions on a wide range of regulatory and rate matters in the United States and Canada. She is a renowned expert in the field of electricity and natural gas tariff designs, innovative regulatory frameworks that strengthen utility operation and investments efficiency, and other measures that support affordability and equity in the transition to a decarbonized energy sector. Many of these assignments involve the development of innovative rate designs using marginal cost of service studies that support fairly pricing customers with demand flexibility, special tariffs and service agreements for data centers and other large loads, efficient compensation for distributed energy resources (DERs), pricing for electric vehicles, and performance based regulatory mechanisms. She has also been deposed in litigation cases related to energy tariff matters.

Ms. Nieto has advised many utilities that ensure mitigation of risk of stranded costs and undue shifting of costs to existing customers when large loads enter their system. In 2022, she was a regulatory advisor to the California Public Utilities Commission in a state-wide reform of the compensation framework for distributed solar to replace net metering. She previously led market design and transmission tariff engagements in the US, Ireland and Australia. She directs a membership-based utility working group that discusses rate innovation and regulatory models. She has been published in the Electricity Journal and Public Utilities Fortnightly and is a frequent speaker at industry and academic energy forums.

EDUCATION

MS, Economics

Institute for Fiscal Studies, Madrid, Spain

BA, Economics

University of Carlos III, Madrid, Spain

PREVIOUS POSITIONS

2023–2026

Principal, Charles River Associates, Los Angeles, CA.

2022–2023

Associate Partner, PA Consulting, Los Angeles, CA.

2020–2022

Senior Director, Energy and Environmental Economics, San Francisco, CA

2018–2020

Senior Vice President, Economists Incorporated, San Francisco, CA

1996–2017

Vice President, NERA Economic Consulting, Los Angeles, CA

PROFESSIONAL EXPERIENCE

Tariff and regulatory experience

- Otter Tail Power Company, MN: Ms. Nieto recommended a new Large Load Tariff for data centers, for recovery of incremental generation, transmission and distribution costs, including a mechanism to contribute to recovery of existing costs that was filed before the MN PSC.
- Texas-New Mexico Power, TX: Ms. Nieto recommended changes to existing Data Center tariff and mechanisms to design pricing terms under the “bringing your own power” arrangements.
- Commonwealth Edison, IL: Testified on the development of a marginal distribution cost study as part of the design of a rebate rate for Distributed Energy Resources (DERs) as potential resources for the grid Company’s Multi-year Grid Plan.
- Avangrid, NYSEG, and RG&E, New York (2005-2026): Cost of Service and Rate Design Expert witness. Led and testified on the development of marginal distribution cost-of-service studies for electric and natural gas rates, and support of changes to electricity rate structures, during the companies’ general rate cases over the years. In a separate Docket, recommended method to estimate locational distribution marginal cost estimates to compensate DERs for their value to the distribution grid, as directed by the Commission VDER Order within the Reforming the Energy Vision (REV) proceeding.
- Eversource Energy, New Hampshire and Connecticut: Expert witness on Rate Design, Marginal Cost Study, Allocated Cost Study. Led and testified on the development of distribution cost-of-service studies as part of the utilities’ rate cases. Designed a proposal for a TOU electric vehicle rate design and an enhanced TOU whole-house rate design as well as a rate that facilitated price signals for efficient heat pump adoption. Recommended an alternative rate design for DC fast charging stations. Previously, Ms. Nieto conducted and testified on marginal cost analysis under the NH Net Metering docket and filed testimony as cost-of-service witness.
- Pacific Gas & Electric, CA: Advised the utility by providing recommendations for a long-term rate design strategy that balanced the goals of innovative rate offerings, high customer satisfaction, and the aggressive decarbonization regulatory climate in California. Led a rate portfolio benchmarking study to inform the IOU’s long-term rate strategy and relative positioning on rate offerings in the U.S. and internationally. Performed interviews with rate design team representatives to understand drivers of tariff design and share learnings.
- DTE Energy, MI: Recommendations for new regulatory mechanisms to manage the Company’s earnings variability associated with large, unplanned load growth, including data center development and mechanisms to provide credits back to other customers.
- NV Energy, NV: Cost of service expert witness in Nevada Power and Sierra Pacific Power general rate cases. Provided direct and rebuttal testimony on behalf of the Company regarding improvements to residential, commercial, and NEM rate designs, supported by the marginal cost analysis, and based on best practice and economic principles. Submitted direct and rebuttal expert testimony before the Nevada Public Utilities Commission in multiple rate cases.

- Sacramento Municipal Utility District (SMUD): Reviewed the Company's cost of service study and recommended and designed a new Large Load Tariff Policy with provisions for recovery of incremental costs.
- Eversource, MA, CT: Time-of-use and wholesale energy storage rate. Supported the design of a residential time-of-use EV rate and a wholesale energy storage rate. Advised on appropriate, time-differentiated rate structures based on a probability of peak cost analysis.
- Southern California Gas Company: Residential monthly fixed charge. Provided support to SoCal Gas in preparing rebuttal testimony on behalf of the Company regarding the theoretical justification for a fixed charge increase based on best practice and results of cost study.
- Central Maine Power Company, Maine: Expert witness. Advised and served as expert witness during the company's electric rate case. Conducted a marginal cost of distribution study and supported the design of enhanced time-of-use (TOU) distribution rate designs for as well as recommendations on other rate structures for all customer classes.
- California Public Utilities Commission: Net energy metering reform. Led the team that provided advisory support and modelling to the energy division of the CPUC with regard to the reform of the CA utilities' net energy metering (NEM 3.0) program for behind the meter solar generation and battery storage. Authored a white paper "Alternative Ratemaking Mechanisms for Distributed Energy Resources in California". Successor Tariff Options Compliant with AB 327" with recommendations for an improved compensation of solar power, more aligned with the value of solar to the system compared to NEM in California. Reviewed stakeholders' testimony and alternative proposals and her recommendations lead to a major statewide decision on NEM 3.0 reform.
- Otter Tail Power, MN, ND, SD: Ms. Nieto has supported the utility in the design of a data center tariff strategy. She has also led the Company's marginal cost of service studies which formed the basis for time of use rates and large general service rate offerings. She supported the Company's design of standby charges for distributed generation in MN, ND and SD rate cases and designed an innovative large industrial time of use rate structure based on marginal cost causation, termed "Super Large General Service Rate", along with support to an Hourly Real Time Price option for the large industrial customers. In 2015, conducted a cost-benefit analysis of OTP's portfolio of interruptible, direct load control and demand response rates, aimed at reducing procurement costs and peak demands.
- Ministry of Energy (SENER), Mexico: Advisor to SENER regarding a comprehensive review of the country's electricity tariff system, including the development of recommendations to reduce the cross-subsidization between electricity customers across provinces, and restructuring of residential rates along with targeted lifeline subsidies to target support to low-income electricity users.
- AES Electropaulo, Brazil: Met with the financial and Rates team in Brazil to review and train the group in estimation of revenue requirement in preparation for their upcoming rate case.
- Ministry of Energy, Argentina: Undertook a review of the Argentine electricity distribution regulatory model as part of a comprehensive review of their electricity system and proposed measures to increase efficiency in the tariff system.

- *FERC-Regulated Natural Gas Pipeline and Storage Utilities - Cost (A&G) Capitalized Overhead Study (Confidential)*. Conducted a time study (2024) for a large Company's gas transmission and storage Company. The study computed an updated capitalized overhead percentage rate (applied January 2025 forward) based on recent test year accounting data and supported by interviews and surveys covering over 50 functional groups and 200 employees across two utility systems.
- San Diego Gas & Electric, California: Residential fixed customer charge reform to support electrification and affordability. Supported the Rates team in the development of changes to the company's residential electric rates to ensure more cost-reflective price signals and optional tiered fixed charges that will support efficient electrification adoption, including charges that vary with customer size.
- Sacramento Utility Municipal District, California: Net metering modeling. Lead team that developed modelling for the utility as part of the design of a package of measures that will replace existing net energy metering and provide cost-effective integration of solar generation and battery storage into the utility's service territory. Recommended revisions to electricity rates including improved TOU and critical peak price (CPP) rates.
- Rocky Mountain Power, Wyoming: Expert witness. Reviewed the Company's calculation of wholesale net power cost adjustments and compliance with FERC's wholesale, cost-based regulated rates for ancillary services. Submit expert testimony with independent opinion on behalf of the utility.
- Salt River Project, Arizona: Marginal cost-of-service study and net metering rate design. Reviewed SRP's marginal cost of service study and provide recommendations for improvement in approaches. Reviewed SRP's proposed Residential Customer Generation Price Plan (E-27) and authored expert report with opinion on the soundness of the proposal. Presented opinion before the SRP's Board of Directors during on-site hearings.
- APS aggregation tariff, Arizona: Recommended an aggregator tariff structure for demand side resources, including distributed solar, energy storage, and demand response technologies, as part of a stakeholder process.
- UK Energy Networks Association, UK: Advisor to the Association on evaluating a potential reform of electricity distribution network incentives to meet new planning standards for new developments, such as the emergence of smart grids.
- Grid Australia, Sydney, Australia: Advisory services regarding performance-based regulation (PBR) methods for electricity networks.
- Nova Scotia Power, Canada: Supported the modelling of marginal distribution costs as a component of the value streams that could contribute to residential energy storage.
- NYSEDA, New York: Developed alternative rate options in modelling of cost impacts of electrification goals.
- Xcel Energy, Minnesota: Retained by Xcel Energy to conduct a cost analysis that would help set the required minimum fixed charge for residential rates in order to recover the marginal costs of connection to the grid, meter, and service. Reviewed company's decoupling proposals.

- BC Hydro, Canada. Developed recommendations on time of use rates for residential and commercial customers and conducted a marginal cost study included estimates of generation, transmission, and distribution marginal costs, to support BC Hydro's upcoming rate case.
- Manitoba Hydro, Manitoba, Canada: Developed the welfare and cost-benefit models that took into account a range of price elasticity by class and the potential load shifting from new TOU rates. Co-authored the study report for submission to the Manitoba Public Utility Board. Provided training to the utility staff on methods to estimate marginal costs in the context of rate design. Advised on the design of time-of-use rates and inverted-block rates in Manitoba.
- Newfoundland Labrador & Hydro, Newfoundland, Canada: Led a study of the marginal cost of generation and transmission for the vertically integrated utility in Newfoundland, and recommended new time-of-use rates using those results.
- Newfoundland Power, Newfoundland, Canada: Managed the team developing a generation and transmission marginal cost of service study, which included projections for 2007–2025 for use in demand-side-management efforts.
- NYISO, New York, US: Provided recommendations to the New York Independent System Operator for a reform of their Black Start service compensation as part of the ISO tariff.
- Barbados Federal Trade Commission, Barbados: Directed the team advising the Barbados energy regulatory commission during Barbados Power and Light (BP&L)'s rate application. Assessed the utility's estimated cost of capital, embedded and marginal electricity cost methods used by the utility to allocate costs to customer classes, and various proposed rates including time of use rate proposals.
- Electricity Regulatory Board (ERB), Kenya, Africa: Co-authored an electricity tariff policy for ERB, aimed at improving the financial health of the sector and promoting the efficient expansion of electricity service. Developed financial models for calculation of utility revenue requirement and provided on-site training to the ERB staff on regulatory analysis and marginal cost studies. Designed the pricing terms of a new sample power purchase agreement between the incumbent generator and the distribution utility.
- Edison Electric Institute (EEI), US. Co-author of "Making a Business of Energy Efficiency: Sustainable Business Models for Utilities," a report on regulatory mechanisms to strengthen utility incentives to launch energy efficiency and demand response programs.
- Regulatory Office for Network Industries (RONI), Slovakia: Directed the team that assisted the Slovakian regulatory commission on the design of efficient support mechanisms for renewable energy sources (RES) and a reliable system of issuing guarantees of origin for RES. Trained the commission staff on best practice RES regulation.
- Illinois Power Agency (IPA), US: Assessment of parameters and benchmark analysis for Solar Renewable Energy Credits (SRECs) in the context of the auction held by Ameren Illinois Company and Commonwealth Edison to procure RECs from solar distributed generation resources.
- Tennessee Valley Authority (TVA), TN, US: Conducted a generation and transmission marginal cost of service study for TVA to be used for rates and to evaluate demand response programs.

- Southern Company, US: Reviewed the company's proposed approach to undertake loss of load expectation analysis and recommended improvements. Provided guidance to develop capacity cost allocation factors for demand response programs and new customer evaluation.
- NB Power, New Brunswick, Canada: Recommended approach to estimate the incremental costs to the utility when customers opt-out of smart metering, taking into account the pace of smart meter deployment plans. Provided rate design recommendations in the light of smart grid investments.
- Abu Dhabi, UEA: Advised on the reform of distribution rates and suitable mechanism to undertake cost allocation based on marginal costs. Proposed revision to existing electricity cross-subsidies.

Consultation Engagements on Wholesale Market Design, Transmission and Auctions

- Ministry of Energy (SENER), Mexico: Advisor to SENER regarding the development of a procurement auction to procure multiple renewable technologies across a variety of timeframes.
- Spanish National Energy Commission (CNE), Madrid, Spain: Administered the default service electricity supply (CESUR) auctions on behalf of the large distribution companies in Spain and Portugal. Assessed the bidders' competitive behaviour during the auctions and prepared an assessment report for the Commission.
- Ministry of Energy, Argentina: Undertook a review of the Argentine wholesale electricity market and co-authored a report for the government on proposed measures to increase competition in the market.
- Alberta Electric System Operator (AESO), Calgary, Alberta, Canada: Analyzed AESO's cost study and transmission cost recovery methods, recommended improvement to wholesale rates for ancillary services and revisions to cost allocation.
- Lower Colorado River Authority (LCRA), Texas, US: Recommended improvements to ERCOT wholesale market rules to incentivize entry of long-duration batteries and fast-start gas combustion turbines and preserve system reliability during winter events.
- Independent System Operator (ISO) of New England, US: Member of the team advising the ISO-NE on revisions to ISO's forward capacity market (FCM) with regard to the Alternative Capacity Price Rule.
- Commission for Energy Regulatory, Ireland: Member of the market design team for the all-island electricity market. Key consultant in the design of options for a capacity payment mechanism that would be viable and sensible in the context of the Irish electricity market.
- MidAmerican Energy Company, Iowa: Directed the team in charge of reviewing and advising MidAmerican Energy's retail branch as part of their market strategy and bidding, and load forecasting procedures for their bidding in ERCOT, MISO, and PJM market. Provided recommendations on resource adequacy and transmission open access tariffs.
- Australian Energy Market Commission, Australia: Critiqued the proposed revisions to the electricity market rules in Australia regarding firm transmission access and rights. Analyzed the suitability of Financial Transmission Rights for the Australian market. Conducted a survey of international transmission planning and cost-allocation methodologies in an earlier assignment.

- Iberdrola, Spain: Member of the team advising a large Spanish electric utility regarding its regulatory strategy and opening up the country industry to introduce a competitive wholesale market design; conducted stranded cost analysis, and recommended the appropriate design for open access tariffs. Participated in industry working groups in charge of proposing detailed policy rules.
- National Energy Commission, Spain: Advised the Commission during the drafting of major energy sector restructuring legislation opening the sector to competition.

Selected Expert Testimony

- Before the Connecticut Public Utilities Regulatory Authority, direct testimony, “Connecticut Light and Power Company, d/b/a Eversource Energy, Marginal Cost Study and Rate Design”, July 14, 2026.
- Before the Illinois Commerce Commission, direct testimony, “Commonwealth Edison Company Distribution Marginal Cost Study”, filed as part of the Company’s updated Multi-Year Integrated Grid Plan. January 23, 2026.
- Before the New York State Public Service Commission, direct testimony, “New York Electric Service and Gas and Rochester Gas & Electric Corporation, Electricity Marginal Cost Study and Application for Rate Design,” June 15, 2025.
- Before the Nevada Public Utilities Commission, rebuttal testimony, Sierra Pacific Power Company, d/b/a NV Energy, “Electricity Rate Design,” June 17, 2024.
- Before the New Hampshire Public Utilities Commission, direct testimony, “Cost of Service Studies and Rate Design” filed on behalf of Eversource, June 11, 2024.
- Before the Illinois Commerce Commission, direct testimony, “Commonwealth Edison Company, Distribution Marginal Cost Study”, filed as part of the Company’s updated Multi-Year Integrated Grid Plan. March 14, 2024, with rebuttal filed on June 21, 2024.
- Before the Nevada Public Utilities Commission, direct testimony, “Sierra Pacific Power Company, d/b/a NV Energy, Electricity Rate Design,” February, 2024.
- Before the Nevada Public Utilities Commission, direct expert testimony, “Review of Electricity Marginal Cost Study, Embedded Cost Study and Time of Use Periods,” June 6, 2023
- Before the Nevada Public Utilities Commission, rebuttal testimony, “Nevada Power Company, Time of Use Periods, Marginal Cost Study and Rate Designs,” October 20, 2023.
- Before the Wyoming Public Service Commission, rebuttal testimony, “Review of Wholesale Rates for Ancillary Services,” on behalf of Rocky Mountain Power. September 26, 2023.
- Before the Maine Public Utilities Commission, direct testimony, “Central Maine Power Company, “Electricity Marginal Cost Study and Efficient Rate Design,” August 11, 2022.
- Before the New York State Public Service Commission, direct testimony, “New York Electric Service and Gas and Rochester Gas & Electric Corporation, Electricity Marginal Cost Study and Rate Designs,” May 26, 2022.
- Before the New York State Public Service Commission, direct testimony, “New York Electric Service and Gas and Rochester Gas & Electric Corporation, Natural Gas Marginal Cost Study,” May 26, 2022.

- Before the New York State Public Service Commission, direct testimony, “New York Electric Service and Gas and Rochester Gas & Electric Corporation, Streetlighting Replacement Cost Study,” May 26, 2022.
- Before the New Hampshire Public Utilities Commission, filed report on the design of a new EV residential rate, on behalf of the Public Service Company of New Hampshire d/b/a Eversource Energy, May 15, 2021.
- Before the New Hampshire Public Utilities Commission, rebuttal testimony, “Cost of Service Studies and Rate Design,” on behalf of the Public Service Company of New Hampshire d/b/a Eversource Energy, March 3, 2020.
- Before the New Hampshire Public Utilities Commission, direct testimony, “Marginal Distribution Cost of Service Study and Implications for Rate Design,” on behalf of Eversource, May 28, 2019.
- Before the New Hampshire Public Utilities Commission, direct testimony, “Allocated Cost of Service Study,” on behalf of the Public Service Company of New Hampshire d/b/a Eversource, May 28, 2019.
- Before the North Dakota Public Service Commission, marginal cost of service study on behalf of Otter Tail Power Company, June 2018.
- Before the Public Utilities Commission of Nevada, rebuttal testimony, “Marginal Costs, Revenue Reconciliation and Rate Design for Net Metering Customers,” in the Matter of the Application of Sierra Pacific Power Company d/b/a NV Energy for Authority to Reform Rates for Electric Utility Service in 2016 GRC, October 31, 2016.
- Before the Public Utilities Commission of the State of Minnesota, direct testimony, “Fixed Charges and Rate Design Policy,” in the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota, February 16, 2016. Rebuttal provided on September 12, 2016.
- Before the New York State Public Service Commission, direct testimony, “Rochester Gas & Electric Corporation Electricity and Natural Gas Marginal Cost of Service Studies,” June 2015.
- Before the New York State Public Service Commission, direct testimony, “New York State Electric and Gas Electricity and Natural Gas Marginal Cost of Service Studies,” June 2015.
- Before the Salt River Project Board of Directors, testimony, “Review of SRP Proposed Residential Customer Generation Price Plan,” February 2015.
- Before the State of North Carolina Utilities Commission, testimony, “Review of Alternative Application of the Peaker Method Proposed by EPCOR USA North Carolina LLC with respect to Computation of Avoided Energy and Capacity Costs,” July 23, 2010.
- Before the New Brunswick Board of Commissioners of Public Utilities, testimony, with Wayne Olson, “The Role of DSM and Demand Response in Load Forecasting and Integrated Resource Planning,” on behalf of the NB Public Intervener, November 9, 2006.

Selected Publications and Conference Papers

“Pricing and Cost Allocation for Data Centers and Other Large Loads to Achieve Fairness and Efficiency Outcomes”, Public Utilities Fortnightly, February 2026.

“The role of Marginal Costs in Design of Electricity Time of Use (TOU) Rate”, conference paper presented to the Massachusetts Electric Rates Task Force, May 2025.

“Design of Wholesale Battery Storage Distribution Rate”, conference paper presented at the Utility Regulation and Rates Working Group, June 10, 2025.

"Optimized Rate Design for an Efficient Transition to Decarbonization: Principles and Case Study", paper presented as invited panelist at EPRI's Annual Seminar for Electric Power Systems. Washington DC, October 30, 2024

“Efficient Rate Design for Data Centers and Contract Mechanisms”, EUCI, December 17, 2024

“Design of Wholesale Battery Storage Distribution Rate”, Utility Regulation and Rates, June 10, 2024.

“An Economist’s View of California Proposed Income-Based Fixed Electricity Rates and Demand-Side Flexibility in California.” Western Rutgers Conference (CRR), Monterey, CA, 2023.

“Efficient Design of Standby Rates for Cogeneration.” Presented to the Southern California Public Power Authority Working Group, April 18, 2023.

“Improved Rate Designs for an Effective Regulatory Construct: Merits of the California NEM Reform for a Cleaner Energy Sector.” Western Rutgers Conference (CRR), Monterey, CA, 2022.

“Compensating NWA Providers for their Value to the System.” EUCI’s annual Non-Wires Alternative (NWA) Conference, online webinar, May 18, 2022.

“Rate Design Principles and Options for Vehicle-Grid Integration”. EUCI June 30, 2021

“Compensatory Framework for Storage and Microgrids for their Value as Capacity and Grid Resources.” 32nd Annual Western Conference (CRR), Monterey, CA, June 28, 2019.

“Examining the Key Pricing Policy Elements of New York’s Reforming the Energy Vision.” 31st Annual Western Conference (CRR), Monterey, CA, June 28, 2018.

“Estimating the Value of Distributed Energy Resources and Implications for Rates.” California Municipal Utility Rates Group (CMRG), Sacramento, May 2018.

“Marginal Cost Methods and Efficient Rate Design.” Utility of the Future Rates Group, San Francisco, CA, April 2018.

Optimizing Prices for Small-Scale Distributed Generation Resources: A Review of Principles and Design Elements. The Electricity Journal, vol. 29, April 2016.

Wholesale Energy Markets: Setting the Right Framework for Price Responsive Demand. The Electricity Journal, vol. 25, December 2012.

“Value-Based Tariff Model for Distributed Energy Resources: Principles and Framework Options.” 30th Annual Western Conference (CRR), Monterey, CA, June 28, 2017.

“Incentive Regulatory Methods for Electricity Distribution.” Rutgers University’s 29th Annual Western Conference (CRR), Monterey, CA, June 23, 2016.

“Renewable Microgrids: Getting the Pricing Right.” Marginal Cost Working Group (MCWG), Washington, DC, May 5, 2016.

“Policy Options to Address Cross Subsidies from Self-Generation.” 12th Annual National Law Seminars International Conference on Electric Utility Ratemaking, Las Vegas, NV, March 14, 2016.

“Demand Charges and their Role in Net Energy Metering.” Residential Demand Charges Symposium, EUCL, Calgary, Canada, December 1, 2015.

“Utility Regulation in the Era of Distributed Renewables: Need for a New Business Model?” Rutgers University’s 28th Annual Western Conference (CRRI), Monterey, CA, June 26, 2015.

“Integrating Renewable Resources through Capacity Markets: The Case of California.” Law Seminars International’s Energy in California, San Francisco, CA, Sep 16, 2014.

“Capacity Markets Put to the Test: New Approaches to Meet Evolving Reliability Needs.” Rutgers University’s 27th Annual Western Conference (CRRI), Monterey, CA, June 26, 2014.

“Rate Design Options to Deal with Solar Net Metering Concerns.” California Municipal Rates Group (CMRG), Sacramento, CA, April 25, 2014.

“Connecting Wholesale and Retail Pricing: A Look at Required Policy and Market Design Decisions.” Harvard Electricity Policy Group, Dana Point, CA, March 7, 2013.

“Demand Response and its Role within Wholesale Energy and Capacity Markets.” Rutgers University’s 25th Annual Western Conference (CRRI), Monterey, CA, June 2012.

“Achieving Efficient Demand Response through Dynamic Rates.” Law Seminars International’s Electric Ratemaking Conference, Las Vegas, NV, February 9, 2009.

“Critical Peak Pricing.” Marginal Cost Workshop, Phoenix, AZ, April 2008.

“Electricity Rate Structure Design: “Rate Design and Cost Studies.” University of PURC’s World Bank International Training Program on Utility Regulation, Florida, January 16, 2007.

Book “The Line in the Sand: The Shifting Boundary between Markets and Regulation in Network Industries.” Chapter 4, Security of Supply. NERA, 2007

“Locational Electricity Capacity Markets: Alternatives to Restore the Missing Signals.” Co-authored with Hamish Fraser. The Electricity Journal, vol. 20, March 2007.

“Performance-Based Regulation of Electricity Transmission in the US: Goals and Necessary Reforms.” Energy Regulation Insights, vol. 28, 2006.

“Responding to EPAct 2005: Looking at Smart Meters for Electricity, Time-Based Rate Structures, and Net Metering.” Sponsored by Edison Electric Institute, May 2006.

“Analysis of the Electricity Sector in Spain” Privatization International and Centre for the Study of Regulated Industries (CRI), Utility Regulation 2000 Series, vol. 1, 2000.