

Rulemaking **R.22-07-005**
Exhibit
Date **June 2, 2023**
Witness **Brian Dickman**
 Justin Kudo
ALJ **Stephanie Wang**

CONCURRENT REPLY TESTIMONY OF

BRIAN DICKMAN

AND

JUSTIN KUDO

ON BEHALF OF

CALIFORNIA COMMUNITY CHOICE ASSOCIATION



**ORDER INSTITUTING RULEMAKING TO ADVANCE DEMAND
FLEXIBILITY THROUGH ELECTRIC RATES.
R.22-07-005**

**CONCURRENT REPLY TESTIMONY OF
BRIAN DICKMAN
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1 **CHAPTER 1. WITNESS BRIAN DICKMAN**

2 **I. INTRODUCTION**

3 Assembly Bill (AB) 205¹ directs the California Public Utilities Commission
4 (Commission) to authorize income-graduated fixed charges (IGFCs) for default
5 residential electricity rates by July 1, 2024. The IGFCs are intended to allow low-income
6 customers to realize lower average monthly bills without changes to electricity usage.
7 Parties submitted Concurrent Opening Testimony presenting proposals for IGFCs on
8 April 7, 2023, in accordance with the January 17, 2023 Administrative Law Judge’s
9 Ruling providing guidance for Phase 1 Track A proposals and AB 205.² The Concurrent
10 Opening Testimony filed by various parties provided proposals for aspects of designing
11 and implementing the IGFC, including but not limited to income tier designs, which costs
12 to recover via the IGFC, and estimated impacts on customer bills. The following replies
13 to two points made in party Concurrent Opening Testimony.

14 First, to comply with AB 205, Public Utilities Code Section 739.9(d) requires IGFC
15 proposals to exclude any volumetric costs.³ The Natural Resources Defense Council
16 (NRDC) jointly proposed with The Utility Reform Network (TURN), however, to include
17 the Power Charge Indifference Adjustment (PCIA) in the IGFC.⁴ Given that the PCIA is a
18 volumetric charge, including the PCIA in IGFC would not only complicate the already
19 complex structure of PCIA rates, but would also contravene Section 739.9(d) and

¹ Assembly Bill No. 205 (introduced Jan. 8, 2021):

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB205.

² *Administrative Law Judge’s Ruling Providing Guidance For Phase 1 Track A Proposals and Requesting Comments on a Consulting Services Proposal*, R.22-07-005 (Jan. 17, 2023):

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K282/501282388.PDF>.

³ Public Utilities Code § 739.9(d).

⁴ NRDC and TURN Concurrent Opening Testimony at 21:

<https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5897/505727242.pdf>.

1 undermine the purpose of providing fixed charges to retail customers. In addition, the
2 Commission should reject Sierra Club’s proposal to include the Competition Transition
3 Charge (CTC) in the IGFC as the CTC is also a volume-based charge. The Commission
4 should reject any proposals that include volumetric generation charges in the IGFC.

5 Second, in their Joint Opening Testimony, Pacific Gas and Electric Company
6 (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric
7 Company (SDG&E) (collectively the IOUs) propose to coordinate with community
8 choice aggregators (CCAs) during the transition to implementing IGFCs and associated
9 rate changes.⁵ CalCCA supports such coordination as it will ensure unbundled customers
10 receive accurate and consistent information about changes to their bills as the IGFCs are
11 implemented. To facilitate better customer communication and information sharing with
12 unbundled customers in their service area, the IOUs should share planned changes in bill
13 presentment, education, and outreach materials on the IGFC, and update weekly report
14 data to include customer income tiers.

15 CalCCA provides the following recommendations in the testimony provided herein:

- 16 • The Commission should reject the proposals of NRDC and TURN to
17 include the PCIA in the IGFC, and the proposal of the Sierra Club to
18 include the CTC in the IGFC, as both charges are volumetric charges
19 which AB 205 explicitly prohibits from inclusion in the IGFC;
- 20 • The Commission should adopt the IOUs’ proposal to coordinate with
21 CCAs in their service area around the transition and implementation of the
22 IGFC, and should further require the IOUs to:
 - 23 ○ Share bill presentation changes related to the IGFC;

⁵ Joint IOU Concurrent Opening Testimony at 104:
<https://edisonintl.sharepoint.com/teams/Public/regpublic/Regulatory%20Documents/Forms/AllItems.aspx?id=%2Fteams%2FPublic%2Fregpublic%2FRegulatory%20Documents%2FPD%2FCPUC%2F22019%2FR207005%2DJoint%20Large%20IOU%20Testimony%20%284%2E7%2E23%29%2Epdf&parent=%2Fteams%2FPublic%2Fregpublic%2FRegulatory%20Documents%2FPD%2FCPUC%2F22019&p=true&ga=1>.

- 1 ○ Coordinate on the development and sharing of education and
2 outreach materials related to the IGFC; and
- 3 ○ Augment weekly data reports to CCAs to include customer income
4 tiers.

5 **II. THE COMMISSION SHOULD REJECT PROPOSALS THAT INCLUDE**
6 **GENERATION CHARGES IN THE DESIGN OF INCOME-GRADUATED**
7 **FIXED CHARGES**

8 Fixed charges are designed to collect a portion of the fixed costs of providing
9 electric service. Including the PCIA in IGFC would not only complicate the already
10 complex structure of PCIA rates but would also contravene the intended design of fixed
11 charges to retail customers. PCIA rates are charged to customers on a vintaged basis,
12 meaning that an individual customer’s responsibility for above-market costs of generation
13 resources depends on the date that customer departed IOU bundled service. As set forth
14 in D.19-10-001, PCIA rates are a volumetric charge calculated by dividing the above-
15 market costs of generation resources by retail customer sales volumes on a vintage-
16 specific basis.⁶ Customers assigned to different vintages pay different PCIA rates.

17 As CalCCA demonstrated in its Opening Brief on Statutory Interpretation, AB
18 205 requires exclusion of the energy and generation capacity charges from the IGFC
19 because such charges are volumetric.⁷ However, NRDC and TURN jointly propose in
20 their Opening Testimony to include the PCIA in the IGFC and refer to PCIA costs as
21 “sunk costs.”⁸ The Commission should reject NRDC’s and TURN’s proposal. PCIA rates
22 are designed to collect the above-market cost of generation resource procurement.

⁶ D.19-10-001, *Decision Refining The Method To Develop and True Up Market Price Benchmarks*, R.17-06-026 (Oct. 10, 2019) at 45:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M318/K167/318167258.PDF>.

⁷ R.22-07-005, *California Community Choice Association’s Opening Brief* (Jan. 23, 2023) at 3:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M501/K533/501533429.PDF>.

⁸ NRDC and TURN Concurrent Opening Testimony at 21.

1 Above-market costs are equal to the net cost of a resource after reflecting the value of the
2 resource attributes, including a credit for revenue earned by selling the resource's
3 generation output into the wholesale energy market. This wholesale revenue, and
4 therefore PCIA rates, vary based on resource output and market prices over time. Since
5 these costs are indeed volumetric, they should be excluded from any IGFC.

6 Similarly, Sierra Club proposes to include the CTC in the IGFC.⁹ The same logic
7 described for the PCIA applies to the CTC. The CTC was established to enable the IOUs
8 to recover uneconomic costs associated with long-term contracts for generating resources.
9 The net costs of such resources are dependent on the market prices and the volume of
10 energy generated. Therefore, the CTC is a volumetric based cost, and the Commission
11 should reject proposals to include volumetric generation charges in the IGFC.

12 **CHAPTER 2. WITNESS JUSTIN KUDO**

13 **III. THE IOUS SHOULD COORDINATE WITH CCAS IN THEIR SERVICE AREA** 14 **AROUND THE TRANSITION AND IMPLEMENTATION OF THE INCOME-** 15 **GRADUATED FIXED CHARGES**

16 In Concurrent Opening Testimony, the IOUs propose coordinating with CCAs on
17 the IOU transition plans related to the IGFC and monitoring any CCA transition activities
18 that may occur simultaneously for the benefit of customer communication. CalCCA
19 appreciates and supports the IOUs' commitment to coordinate with CCAs to ensure
20 customer communication is consistent and that all customers can understand how their
21 bills will change as a result of the implementation of IGFCs.

22 Implementing IGFCs will lead to potentially significant changes in customer bills
23 – particularly in terms of bill presentation. Vital to customer acceptance of IGFCs is an

⁹ Sierra Club Concurrent Opening Testimony at 9:
<https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2207005/5977/507387504.pdf>.

1 understanding of these changes including the reduced volumetric charges, the added fixed
2 charge, and the net impact on the customer. New charges and unexpected bill totals are
3 the primary reason CCAs have customer service interactions. In fact, most CCA customer
4 service interactions are due to reasons unrelated to CCA service, and include IOU rate
5 transitions, unusually high usage, high gas bills, Net Energy Metering (NEM) true-ups,
6 and expiration of California Alternate Rates for Energy (CARE) and Family Electric Rate
7 Assistance (FERA) eligibility. The IOUs and CCAs should work collaboratively to
8 develop messaging for customers regarding IGFCs that is clear to both bundled and
9 unbundled customers. Coordination between the IOUs and their respective CCAs can
10 minimize the risk of customer confusion, including mistakenly attributing any decreased
11 or increased monthly bills to their choice of electric service provider.

12 In addition to the general commitment to cooperation between the IOUs and
13 CCAs regarding IGFC implementation, the following specific proposals on IGFC
14 implementation coordination will also ensure the necessary consistent messaging to
15 customers. First, the Commission should require the IOUs to solicit CCA input on any
16 planned changes to bill presentation, including how the changes will be presented on
17 customers' bills and the timeline for when IOUs will implement IGFCs with CCAs in
18 their service area. Second, the Commission should require the IOUs to share and solicit
19 input on education and outreach materials on the IGFC with CCAs so that CCAs
20 understand how IOUs will communicate the new system of fixed charges and lower
21 volumetric rates to customers. Bundled and unbundled customers should be able to
22 understand their bill components, including the IGFC as just one component of the
23 transmission and distribution costs on their bills. As CCA customer service staff will be

1 handling many inquiries on the IGFC, coordination is important so the CCA and IOU can
2 use consistent explanatory language. Third, the IOUs should augment both the weekly
3 customer database updates and billing transactions provided to CCAs to include the IGFC
4 income tier and charge for each customer.¹⁰ Similar to how CARE program data are
5 already shared with CCAs for unbundled customers, the IGFC income tier data will help
6 CCA staff to answer customer questions about the IGFC and educate customers about
7 their rate options and other programs to provide them with bill assistance.

8 **IV. CONCLUSION**

9 This concludes both Brian Dickman and Justin Kudo's Concurrent Reply
10 Testimony.

¹⁰ IOUs provide weekly data reports to CCAs in their service territory containing customer account data, which have different names depending on IOU service area. The report is the "CRCR 4013 report" in PG&E's service territory, the "Customer List" in SCE's service territory, and "Recon Report" in SDG&E's service territory. These reports include enrollment status for CARE and FERA programs.

ATTACHMENT A
CURRICULUM VITAE OF BRIAN DICKMAN

Mr. Brian Dickman is a partner in NewGen's energy practice with 20 years of utility industry experience. Mr. Dickman's career includes over a decade working for PacifiCorp, a vertically integrated investor-owned utility, including senior-level positions in regulatory, financial, and commercial roles. He began consulting in 2017, assisting a wide array of clients across the United States and internationally, including utilities, large consumers, and private investment firms. Mr. Dickman has extensive experience preparing and evaluating utility revenue requirements and cost allocation studies, developing utility avoided costs, and analyzing the impact of new initiatives and transactions on a utility and its customers. In addition to his extensive technical experience, Mr. Dickman understands the regulatory governance process, and he has personally testified as an expert witness before state public utility commissions in California, Idaho, Indiana, Oregon, Utah, Washington, and Wyoming.

Mr. Dickman advises numerous Community Choice Aggregator (CCA) clients in California, focusing on regulatory and rate issues such as the state-mandated exit fee known as the Power Charge Indifference Adjustment (PCIA). He also represents California CCAs as a member of the Cost Allocation Mechanism Procurement Review Groups for PG&E and Southern California Edison established by the California Public Utility Commission to provide an independent review of the centralized procurement of local generation capacity requirements.

EDUCATION

- Master of Business Administration, Finance Emphasis, University of Utah
- Bachelor of Science, Accounting, Utah State University

KEY EXPERTISE

- Cost of Service and Rates
- Financial Analysis and Modeling
- Power Charge Indifference Amount
- Regulatory Strategy
- Revenue Requirement

RELEVANT EXPERIENCE

Electric Cost of Service, Rate Design, and Regulatory Analysis

Mr. Dickman leads projects developing utility revenue requirements, preparing cost of service and rate design studies, and performing financial and regulatory analyses for electric utilities. Mr. Dickman previously held leadership positions at a multi-billion-dollar utility. He was responsible for interfacing with state regulatory agencies in support of revenue requirements, cost recovery mechanisms, avoided costs, valuations of potential asset acquisitions and other commercial opportunities, and financial impacts of utility initiatives. Mr. Dickman now works with clients and stakeholders to prepare pro forma financial models to determine revenue sufficiency, evaluate the cost of service studies and rate design proposals, and support such proposals before local and state governing bodies. Mr. Dickman's experience also includes evaluating the financial and rate impact of proposed mergers and acquisitions, acquisition and divestiture of utility assets, negotiated retail service contracts, changing business models, and stranded costs due to exiting load.

Brian Dickman

PARTNER

Expert Witness and Litigation Support

Mr. Dickman provides comprehensive expert witness testimony related to utility revenue requirements, cost of service, rate design, and other ratemaking issues before state and local regulatory bodies. He has provided litigation support in wholesale and retail jurisdictions, including California, Idaho, Indiana, Oregon, Washington, Wyoming, Utah, the Federal Energy Regulatory Commission, and Ontario Energy Board. Mr. Dickman offers expert witness testimony and litigation support in the following areas.

Revenue Requirement | Cost Allocation | Rate Design

Mr. Dickman prepared revenue requirements, inter-jurisdictional cost allocation, coincident peak allocation studies, and supporting testimony for PacifiCorp over many years. He now provides litigation support and expert testimony for clients wishing to review utility filings on revenue requirement, cost allocation, and rate design, including program-specific rate tariffs.

Power Supply Costs | Stranded Costs | Rate Adjustment Mechanisms

Mr. Dickman has prepared and evaluated variable power supply cost forecasts, power supply cost balancing accounts and other rate mechanisms, stranded costs, and exit fees for departing load. Since 2019, Mr. Dickman has actively participated in PCIA matters in California on behalf of CCA clients.

Avoided Costs | Resource Valuation

Mr. Dickman provided expert testimony for PacifiCorp on various components included in a proposed method for valuing solar generation resources, the calculation of Public Utility Regulatory Policies Act avoided costs for large resources, and support of modifications to the avoided cost calculation for small resources.

A sample of Mr. Dickman's utility clients includes the following:

- Abu Dhabi Distribution Company, UAE
- Central Coast Community Energy, CA
- City and County of San Francisco, CA
- Clean Power Alliance, CA
- Duke Energy, NC
- East Bay Community Energy, CA
- Hydro One, Ontario, CA
- Liberty Utilities, CA
- Lubbock Power and Light, TX
- Minnesota Power, MN
- New York Power Authority, NY
- Portland General Electric, OR
- San Diego Community Power, CA
- San Jose Clean Energy, CA
- Silicon Valley Clean Energy Authority, CA
- Vermont Gas Systems, VT

A sample of Mr. Dickman's non-utility clients includes the following:

- Blackstone Group, NY
- California Community Choice Association, CA
- Facebook, CA
- Hemlock Semiconductor, MI
- Newmont Mining, NV
- SABIC Innovative Plastics, IN
- Tri-County Metropolitan Transportation District, OR
- Vistra Energy, TX

WORKSHOPS AND PRESENTATIONS

Host organizations and the topics Mr. Dickman presented are displayed below.

Customer Choice at a Vertically Integrated Utility

Advanced Workshop in Regulation and Competition, Center for Research in Regulated Industries, 2018

Record of Testimony: Brian Dickman

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
1. SCE	A.12-01-008 A.12-04-020 A.14-01-007	Declaration supporting response to petition for modification of D.15-01-051, addressing changes to optional green tariff program rates	California Public Utilities Commission	Clean Power Alliance, California Choice Energy Authority	2022
2. SCE	A.22-05-014	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance, California Choice Energy Authority, and Central Coast Community Energy	2022
3. PG&E, SCE, SDG&E	A.20-02-009 A.20-04-002 A.20-06-001 (Consolidated)	Expert testimony evaluating the unrealized sales volumes and revenue due to Public Safety Power Shutoff events	California Public Utilities Commission	CCA Parties (9 individual CCAs)	2022
4. San Diego Gas & Electric	A.21-09-001	Expert testimony responding to proposed residential electrification tariff	California Public Utilities Commission	San Diego Community Power and Clean Energy Alliance	2022
5. San Diego Gas & Electric	R.20-05-003	Declaration supporting motion for clarification of D.19-11-016, quantifying impact to allocated incremental reliability procurement requirement due to departing load	California Public Utilities Commission	San Diego Community Power	2021
6. Southern California Edison	A.21-06-003	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance and California Choice Energy Authority	2021
7. Pacific Gas & Electric	A.21-06-001	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Joint Community Choice Aggregators	2021
8. San Diego Gas & Electric	A.21-04-010	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	San Diego Community Power and Clean Energy Alliance	2021
9. Pacific Gas & Electric	A.12-01-008 A.12-04-020 A.14-01-007	Declaration supporting petition for modification of D.15-01-051, recommending changes to optional green tariff program rates designed to avoid shifting costs of resource capacity to non-participants	California Public Utilities Commission	Joint Community Choice Aggregators	2021

Record of Testimony: Brian Dickman

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
10. Pacific Gas & Electric	A.19-11-019	Expert testimony (adopted) addressing use of marginal costs to determine economic development rates and responding to proposed electrification tariff for retail customers	California Public Utilities Commission	Joint Community Choice Aggregators	2021
11. Pacific Gas & Electric	A.20-07-002	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Joint Community Choice Aggregators	2020
12. Southern California Edison	A.20-07-004	Expert testimony evaluating the calculation of the Power Charge Indifference Amount charged to Community Choice Aggregators	California Public Utilities Commission	Clean Power Alliance and California Choice Energy Authority	2020
13. Pacific Power	Docket UE 375	Joint testimony supporting a settlement agreement resolving the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon	Facebook, Inc.	2020
14. Pacific Gas & Electric	A.20-02-009	Expert testimony evaluating the appropriateness of entries recorded to the Portfolio Allocation Balancing Account to true up the Power Charge Indifference Amount	California Public Utilities Commission	Joint Community Choice Aggregators	2020
15. Vectren Energy Delivery of Indiana	Cause No. 43354 MCRA 21 S1	Expert testimony supporting a settlement agreement regarding the calculation and use of a 4CP load study to allocate tariff rider costs among customer classes	Indiana Utility Regulatory Commission	SABIC Innovative Plastics Mt. Vernon, LLC	2020
16. PacifiCorp	Docket UE 307	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2016
17. PacifiCorp	Docket UM 1662	Joint testimony with Portland General Electric regarding the need for a renewable resource tracking mechanism to provide cost recovery related to the impacts of renewable resource generation	Public Utility Commission of Oregon		2015
18. PacifiCorp	Docket UE 296	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2015

Record of Testimony: Brian Dickman

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
19. PacifiCorp	Docket No. 20000-469-ER-15	Expert testimony regarding the annual variable power supply cost forecast and modifications to the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming		2015
20. PacifiCorp	Docket No. 15-035-03	Provided expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2015
21. PacifiCorp	Docket UM 1716	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Utility Commission of Oregon		2015
22. PacifiCorp	Docket No. 20000-481-EA-15	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resources	Public Service Commission of Wyoming		2015
23. PacifiCorp	Docket No. 15-035-T06	Expert testimony updating standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Public Service Commission of Utah		2015
24. PacifiCorp	Case No. PAC-E-15-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large resource	Idaho Public Utilities Commission		2015
25. PacifiCorp	Docket UE-144160	Declaration supporting updates to standard PURPA avoided cost prices and supporting modifications to the avoided cost calculation for small resources	Washington Utilities and Transportation Commission		2014
26. PacifiCorp	Docket UE 287	Expert testimony supporting the annual variable power supply cost forecast and generation resource dispatch model	Public Utility Commission of Oregon		2014
27. PacifiCorp	Case No. PAC-E-14-01	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission		2014
28. PacifiCorp	Docket A.14-08-002	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2014
29. PacifiCorp	Docket No. 20000-447-EA-14	Expert testimony regarding the true up of annual variable power supply cost in the Energy Cost Adjustment Mechanism	Public Service Commission of Wyoming		2014

Record of Testimony: Brian Dickman

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
30. PacifiCorp	Docket No. 14-035-31	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2014
31. PacifiCorp	Case No. PAC-E-13-03	Expert testimony regarding the true up of variable power supply costs in the Energy Cost Adjustment Mechanism	Idaho Public Utilities Commission		2013
32. PacifiCorp	Docket A.13-08-001	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2013
33. PacifiCorp	Docket No. 13-035-32	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2013
34. PacifiCorp	Docket UM 1610	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Public Utility Commission of Oregon		2012
35. PacifiCorp	Docket A.12-08-003	Expert testimony supporting the annual variable power supply cost forecast and the true up of costs in the Energy Cost Adjustment Clause mechanism	California Public Utilities Commission		2012
36. PacifiCorp	Docket No. 12-035-67	Expert testimony regarding the true up of variable power supply costs in the Energy Balancing Account mechanism	Public Service Commission of Utah		2012
37. PacifiCorp	Docket No. 20000-389-EP-11	Expert testimony regarding the collection of deferred balances accrued through previous Power Cost Adjustment Mechanisms	Public Service Commission of Wyoming		2011
38. PacifiCorp	Docket No. 20000-405-ER-11	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2011
39. PacifiCorp	Case No. GNR-E-11-03	Expert testimony proposing changes to the calculation of PURPA avoided costs for large and small generation resources	Idaho Public Utilities Commission		2011
40. PacifiCorp	Case No. PAC-E-06-10	Expert testimony regarding low income customer weatherization rebates	Idaho Public Utilities Commission		2010

Record of Testimony: Brian Dickman

UTILITY	PROCEEDING	SUBJECT	BEFORE	CLIENT	YEAR
41. PacifiCorp	Docket No. 20000-405-ER-10	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2010
42. PacifiCorp	Docket No. 10-035-89	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Utah		2010
43. PacifiCorp	Docket No. 20000-352-ER-09	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2009
44. PacifiCorp	Case No. PAC-E-08-07	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Idaho Public Utilities Commission		2008
45. PacifiCorp	Docket No. 20000-333-ER-08	Inter-jurisdictional cost allocation and revenue requirement and sponsored expert testimony in corresponding general rate case	Public Service Commission of Wyoming		2008

ATTACHMENT B
CURRICULUM VITAE OF JUSTIN KUDO

Statement of Qualifications of Justin Kudo

Q1: Mr. Kudo, please state your name, position, and address.

A1: My name is Justin Kudo. I am the Senior Strategic Analysis and Rates Manager for Marin Clean Energy (“MCE”). My business address is 1125 Tamalpais Avenue, San Rafael, California 94901.

Q2: Please describe your background.

A2: Since 2019, I have been responsible for leading MCE’s annual ratesetting process in MCE’s Finance team under the CFO. I am also a subject-matter expert on most rate-related issues for MCE, including the transition to time-of-use rates, hourly rate development, billing operations, implementation issues, and the history of MCE’s operations and relationship with PG&E.

I was also one of MCE’s initial employees, starting at MCE in 2012 when the CCA business was still quite small and new. During this time, I worked in MCE’s Public Affairs team leading MCE’s billing operations and customer care efforts, as well as managing MCE’s relationship with PG&E. Many of the standards we use today, such as CCA access to interval meter data, availability of virtual and aggregated net energy metering, overall MCE and PG&E approaches towards customer care, cost comparisons, and neutrality of language, are initiatives that I worked to develop alongside PG&E.

Prior to MCE, I spent six years at a small public policy consultancy managing several key energy clients, including NextEra Energy, California Solar Energy Industries Association, and the International Brotherhood of Electrical Workers clients.

Q3: What is the purpose of your testimony?

A3: To ensure that the IGFC is implemented in the clearest and most equitable way possible for all PG&E customers, including those served by CCA programs.

My testimony is aimed at the inclusion of CCAs in the marketing, education, and outreach efforts of utilities on the IGFC, to ensure that implementation is as clear as possible for all customers.

Q4: Does this conclude your statement of qualifications?

A4: Yes, it does.

Resume of Justin Kudo

PROFESSIONAL EXPERIENCE

Senior Strategic Analysis and Rates Manager, Marin Clean Energy **2019-Present**

- Responsible for leading MCE's overall ratesetting process and rate design, including revenue forecasting, proposal development, rate modeling, implementation.
- Subject-matter expert on MCE and PG&E rates, Time-of-Use transition, billing operations, Net Energy Metering (NEM) (and successor) programs.
- Ongoing development and maintenance of models for rate design, revenue forecasting, NEM 3.0 transition, energy transaction validations, etc.
- Project manager for the California Energy Commission's Load Management Standards and Market Informed Demand Automation Server (MIDAS) implementation.
- Project manager for California Public Utilities Commission's Demand Flexibility initiatives and hourly rate development.

Deputy Director of Account Services, Marin Clean Energy **2012-2019**

- Led implementation of MCE services through six inclusion periods, growing MCE's customer base from 14,000 to over 450,000 accounts served.
- Managed MCE's overall billing operations and customer care, as well as data analysis; directly managed key C&I customers, as well as municipal, state, and federal customers.
- Developed MCE and PG&E's business relationship as the primary contact, transitioning from a competitive environment to a collaborative one, working to best serve mutual customers.
- Developed MCE's NEM Program and authored tariff revisions; worked to ensure CCA customer access to programs such as Virtual and Aggregated NEM.
- Developed rate modeling tools used to determine both customer-side billing impacts and service provider-side revenue impacts.

Public Policy Consultant (San Francisco Bay Area) **2011-2012**

- Supported clients in energy policy, municipal utility, public relations, and labor relations.

Senior Associate, James Burchill & Associates (Davis) **2006-2011**

- Represented key clients in energy and labor, including IBEW, CalSEIA, Florida Power and Light on issues around renewable energy and labor policy.

VOLUNTEER EXPERIENCE AND GOVERNANCE

Executive Committee & Board Member, Marin Economic Forum	2016-Current
Member, Novato Chamber of Commerce Govt. Affairs Committee	2014-Current
Member, City of Davis Planning Commission	2010-2011
Co-Chair, City of Davis Human Relations Commission	2008-2010

EDUCATION

Bachelor of Arts	Psychology, San Francisco State University	2004
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