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Kimberly A. Fontan
Vice President
Louisiana Regulatory Affairs

June 24, 2015

Via Electronic Mail and U.S. Mail
Ms. Eve Kahao Gonzalez
Executive Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, LA 70812

Re: Entergy Services, Inc.'s Potential Request for Proposals for Long-Term Louisiana Combined-Cycle Gas Turbine Developmental Capacity and Energy Resources and Request for Modification of the MBM Order

Dear Secretary Gonzalez,

Entergy Services, Inc. ("ESI") provides this notice of intent to issue a Request For Proposals ("RFP") for Long-Term Louisiana Combined-Cycle Gas Turbine Developmental Capacity and Energy Resources to be constructed within the West of the Atchafalaya Basin ("WOTAB") planning region. Entergy Gulf States Louisiana, L.L.C. ("EGSL") and/or Entergy Louisiana, LLC ("ELL") (collectively, the "Companies") may participate in resources that may be selected through this RFP, and ESI plans to market test a Louisiana self-build option in this RFP. This letter shall serve as the advanced notification required by paragraph 14 of the Commission's Market Based Mechanisms ("MBM") Order,[1] but this notification should not be construed as a commitment of ESI or the Companies to proceed with the RFP, to proceed with a self-build resource, or to proceed on any particular time frame, nor should it be construed to limit the types of products or range of capacity that may be sought in any RFP that is issued.

As indicated in various recent proceedings and in the Companies' Draft Integrated Resource Plan report filed in Docket No. I-33014, ESI has identified a local capacity and energy need of approximately 800-1,000 MW (summer conditions) beginning in the 2020 time frame in the WOTAB region of Louisiana to address forecasted load growth and potential unit deactivations, as well as to obtain the enhanced reliability and other advantages of locating generation proximate to the WOTAB load, particularly in the Lake Charles area. The need for new-build generation is driven by several factors, including ESI's forecast that the capacity market in MISO South will be approaching equilibrium in the early part of the next decade, the

[1] Docket No. R-26172, Sub Docket C. *In re: Possible suspension of, or amendments to, the Commission's General Order dated November 3, 2006 (Market Based Mechanisms Order) to make the process more efficient and to consider allowing the use of on-line auctions for competitive procurement*, as amended October 29, 2008.

Companies' long-term capacity planning, the potential for higher than expected load growth and/or unit deactivations, and the inherent benefits of in-region generation. ESI has determined that customers are best served by additional generation sited proximate to load in the WOTAB planning region, a region that is supply constrained, vulnerable to serious storms, and where the average age of generating units will be over 40 years in 2020. Siting new generation within WOTAB is needed to assist in power restoration efforts in the event of transmission line outages, such as may occur following major weather events, and to be available to preserve reliable service and system stability in the event of forced outages of the older, existing units operating within the WOTAB region given its supply constraints. ESI anticipates that the RFP will market test a self-build generating project in WOTAB, with an in-service date in 2020. The proposed self-build option will be compared against third-party proposals submitted in the RFP for additional long-term generation to be constructed in Louisiana in WOTAB by potential bidders, with a preference for resources sited in the Lake Charles area. The expected location of the self-build option is the Nelson Station; the actual location will be declared in the draft RFP.

The draft RFP is expected to be issued no earlier than July 24, 2015, which will be 30 days after this advance notification as required by the MBM Order. ESI currently contemplates issuing the final RFP documents on August 31, 2015, which is 38 days after expected issuance of the draft RFP. This review period is somewhat less than the 60-day review period provided in the MBM Order. ESI submits that good cause exists for the shortened review period and that it is reasonable in this case. ESI's 2014 RFP for long-term resources in Amite South was only recently completed and took approximately 12 months from advanced notification to selection. The pendency of the Amite South RFP and other RFP efforts and activities made it infeasible for ESI to commence the WOTAB RFP sooner. However, the resource to be sought in the WOTAB RFP is needed no later than summer 2020, and the time needed to conduct an RFP, negotiate the necessary contracts, obtain internal and regulatory approvals, and construct the resource presents a challenge to bringing a new resource online in summer 2020. While ESI will make reasonable efforts to manage its processes to achieve the required in-service date, shortening the 60 day review period to 38 days will make it more likely that the in-service date can be achieved.

ESI submits that 30-40 days to review and comment on the draft RFP is adequate and reasonable because the terms of the draft WOTAB RFP are expected to be substantially similar to the terms of the final 2014 Amite South RFP document, which is still posted on ESI's RFP website.[2] Also, in connection with this notification letter, ESI is providing draft minimum requirements (Appendix A) that are expected to be included in the draft WOTAB RFP. While these minimum requirements could be modified in the RFP drafting process, review of these minimum requirements, as well as RFP documents from the Amite South RFP, will allow all stakeholders to be well prepared to review the draft RFP in a shortened timeframe. Accordingly, ESI submits that good cause exists to shorten the review period following the draft RFP to between 30-40 days and requests that the Commission act on this request at its July 2015 B&E meeting.

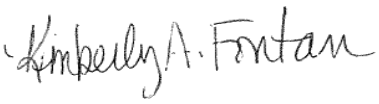
ESI has identified Wayne Oliver of Merrimack Energy Group, Inc. to serve as an independent monitor for this RFP. ESI represents that Mr. Oliver has had no business dealings

[2] https://spofossil.entergy.com/ENTRFP/SEND/AmiteSouthRFP/Index.htm.

with ESI or its affiliates in the last three years, other than as independent monitor. While Mr. Oliver has served as an independent evaluator, monitor, or auditor for over 25 competitive procurements for conventional resources, as well as renewable resources, demand-side management or distributed resources, he has not monitored such a procurement process on behalf of LPSC jurisdictional utilities. Accordingly, Mr. Oliver's educational background and professional experience are summarized in Appendix B.

As contemplated by the MBM Order, ESI will work with Commission Staff in the development of the RFP. In order to facilitate timely coordination with Staff, should the Commission and Staff wish to engage outside expert assistance, ESI respectfully requests that such arrangements be made as soon as reasonably practicable and a hiring made at the July 2015 B&E meeting. ESI notes that the WOTAB RFP will be substantially similar to the recently completed Amite South RFP, for which the Commission retained Henderson Ridge Consulting. Given the similarities between the two RFPs, there are likely cost savings and efficiencies that can be achieved if the Commission were to retain Henderson Ridge Consulting for the WOTAB RFP. Further, ESI requests that the Commission accept this letter as advance notification of intent to issue an RFP and publish notice of the RFP in its Official Bulletin.

Sincerely,



Kimberly A. Fontan

cc: Commissioner Eric F. Skrmetta (via U.S. mail)
Commissioner Clyde C. Holloway (via U.S. mail)
Commissioner Foster L. Campbell (via U.S. mail)
Commissioner Lambert C. Boissiere, III (via U.S. mail)
Commissioner Scott A. Angelle (via U.S. mail)
Executive Assistants to Commissioners (via electronic mail)
Brandon Frey (via electronic mail and U.S. mail)
Melissa Watson (via electronic mail and U.S. mail)
Melissa Starnes (via electronic mail and U.S. mail)
Wayne Oliver (via electronic mail)

APPENDIX A

DRAFT - MINIMUM REQUIREMENTS FOR DEVELOPMENTAL RESOURCES

This draft Minimum Requirements for Developmental Resources sets forth certain minimum requirements that a new-build, or developmental resource ("Developmental Resource"), must satisfy in the 2015 Request for Proposals for Long-Term Louisiana Combined-Cycle Gas Turbine Developmental Capacity and Energy Resources (the "RFP") for Entergy Gulf States Louisiana, L.L.C. ("EGSL") and Entergy Louisiana, LLC ("ELL") issued by Entergy Services, Inc. ("ESI") on behalf of EGSL and ELL (the "Minimum Requirements"). The draft Minimum Requirements are specified in the chart below, and are in addition to other RFP requirements that a bidder in the RFP ("Bidder") must satisfy. The Minimum Requirements are designed to ensure that a Developmental Resource offered in a proposal submitted into the RFP is developed to a degree meriting detailed, full-scale evaluation by the appropriate RFP evaluation teams and potential selection of the resource. Bidders are advised that the RFP will seek information from each Bidder related to the Developmental Resource(s) included in its proposal(s) that significantly exceeds the information necessary for its proposal(s) to meet the Minimum Requirements. Bidders are further advised that satisfaction of the Minimum Requirements does not ensure that a proposal will be eligible for participation in the RFP; other RFP eligibility requirements, to be specified in the RFP, must also be met. This draft Minimum Requirements document is subject to change and, when the RFP is issued, will take the form of an appendix to the RFP that will supersede this document.

Criterion	**Minimum Requirement**	**Information Required to Evaluate Proposals against the Minimum Requirements**
Project Overview	Complete project description.	Bidder must provide a reasonably thorough and accurate summary description of the project, including, but not limited to, the proposed location, site description, generation technology, major equipment, design basis, water source(s), fuel supply and transportation sources, plan for engineering, procurement, and construction, environmental compliance, and permitting, status of interconnection

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		and non-standard project components/ considerations, as well as a summary of the work completed on each of the Minimum Requirements. The provision of information in the summary description does not limit the requirement for Bidder to provide the information sought below.
Bidder Experience	Bidder (or the person that will be the seller under Bidder's proposal ("Seller")) must have completed at least one (1) utility-scale project with the generation technology to be offered in Bidder's proposal (*e.g.*, one utility-scale CCGT project) and have project team members who, in the aggregate, have had direct responsibility for the development of at least three (3) completed utility-scale projects, regardless of generation technology.	Bidder must provide a summary that includes the key project team members, their relationship to Bidder (*e.g.*, employee of Bidder or Bidder parent), their backgrounds, current title/position, and development experience, and a description or list of relevant projects they and Bidder or Seller have completed.
Project Development	Bidder must provide reasonable evidence that project development for the proposed resource is beyond the conceptual phase for design, engineering, and plan for execution.	o *Engineering*: Bidder must provide reasonable evidence that the project has been translated from the screening and planning phase of development into a project definition of sufficient detail and quality to ensure the efficient progression of detailed engineering and procurement if the project is selected. o *Cost Estimate*: Bidder must provide

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		reasonable evidence that its project cost estimate is based on front-end engineering from a qualified external and/or internal source that supports a Class 3 (as defined by AACE standards) cost estimate (-20% to +30%). At a minimum, the cost estimate should account for the following: i) mechanical and electrical equipment; ii) instrumentation and controls; iii) piping; iv) misc. buildings; v) structural steel; vi) site work and foundations; vii) retrofit allowance (if applicable); viii) sales tax; ix) engineering costs; x) indirect costs; xi) spare parts; xii) escalation; xiii) construction financing costs; xiv) fuel handling and storage equipment; and xv) any other category not listed here and reasonably expected to be included for the proposed technology.

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		o *Project Schedule:* Bidder must provide, at a minimum, a Level 2 (as defined by AACE standards) project schedule that supports all aspects of project execution, including development, design, engineering, financing, procurement, permitting, interconnection, construction, and testing, and project support materials that, along with the information provided in response to ESI's due diligence questions in the RFP, demonstrate Bidder's (or Seller's) capability to meet the date by which commercial operation of the Developmental Resource is guaranteed by Bidder to have occurred and related project milestones for the proposed resource (financial closing, partial and full notices to proceed for major project contractors, applications for and receipt of major permits, major equipment deliveries, foundation pours, completion of gas, power, water, wastewater, and other material interconnections, etc.).

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
Certain Required Project Attributes	**Technology:** Commercially-proven CCGT technology.[1] **Developmental Resource:** Single integrated plant. **Minimum Size:** 800 MW (summer conditions (97° Fahrenheit and 56% relative humidity ("Summer Conditions"), at full load, including duct-firing). **Maximum Size:** 1,000 MW (Summer Conditions, at full load, including duct-firing). **Net Unit Heat Rate at Summer Conditions:** No greater than 7,000 Btu/kWh (HHV) at full output, without duct-firing. **AGC:** Required. **Steam Injection for Power Augmentation:** Not permitted.[2]	Bidder must identify the original equipment manufacturers of the major equipment being proposed and detail the (technology-based) operating parameters of each generating unit comprising the Developmental Resource (*e.g.*, net electrical generating capacity, net heat rate, and operating ranges at Summer Conditions, maximum ramp rates, start times (cold, warm, and hot), start restrictions (if any), minimum dispatch levels, and minimum down times) and the Developmental Resource as a whole. Note: For any power purchase or tolling agreement arising out of the RFP, EGSL and/or ELL intends to have the flexibility to schedule and dispatch the Developmental Resource as if the resource were its own generation resource having the same or similar type of generation technology. To ensure clarity, the RFP

[1] For the RFP, commercially-proven technology is technology that ESI determines has, as of the time of issuance of this draft Minimum Requirements, a sufficient amount of operational and performance data and information demonstrating, to ESI's satisfaction, (i) sustained, reliable, and otherwise acceptable performance in the CCGT configuration proposed and (ii) the CCGT technology's suitability for service in the resource's intended roles as an EGSL and ELL resource (*e.g.*, meeting local voltage support and load-serving responsibilities in a load pocket). Examples of CCGT technology determined at this time not to be commercially proven for the RFP include General Electric "7HA" technology and Mitsubishi "JAC" technology. If a Bidder is unclear whether a CCGT generation technology that Bidder intends to or may propose in the RFP is commercially-proven technology for purposes of the RFP, Bidder may submit a request to ESI and the Independent Monitor seeking the desired clarification and ESI will answer the request. Bidder may be required to supply information concerning the subject CCGT technology and potential Developmental Resource to ESI and the Independent Monitor to assist ESI in the development of its answer.

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
	Heat Rejection Systems, including the main condenser and mechanical draft cooling tower: Must be sufficiently sized to allow continued operation of all combustion turbines in the event of a steam turbine trip. **Joint Ownership (Acquisition Resources Only):** Not permitted.	will not permit a system sale from multiple resources.
Project Location	The resource must be electrically interconnected directly to Entergy Gulf States Louisiana, L.L.C. within the West of the Atchafalaya Basin ("WOTAB") planning region. Please see Attachment 1 below for a map of EGSL's service area in WOTAB (indicated in red), with the Lake Charles area indicated in light blue.[3]	o The resource must be interconnected at a transmission (as opposed to distribution) level. o Bidder must include a map and plat of the project location.
Site Control	Bidder must show that Seller (or an affiliate under Seller's control) has control of the site on which the project would be located or has a valid, binding, and enforceable contract to obtain control of the project site for the full	o Bidder should provide a redacted copy of the definitive agreements or documents establishing the requisite site control. o Bidder must provide its own project site. EGSL and ELL will not offer to

[2] Inlet evaporative cooling is not power augmentation for purposes of the RFP.

[3] If a Bidder is unclear whether a Developmental Resource that Bidder intends to or may propose in the RFP would be located within WOTAB, Bidder may, after posting of the Draft RFP, request that ESI advise Bidder whether the Developmental Resource is within WOTAB and ESI will answer the request. Please see page [___] of the Notice of RFP for information regarding the submission of questions about the RFP to ESI and the Independent Monitor. Bidder may be required to provide information concerning the location and planned interconnections of the Developmental Resource and other relevant information to assist ESI in the development of its answer.

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
	delivery term proposed by Bidder or the expected useful life of the resource. A letter of intent, memorandum of understanding, or other similar document contemplating the subsequent negotiation of a definitive agreement, in each case regarding Bidder's control of the project site, will not satisfy the foregoing site control requirement.	third-party bidders the use or control of any potential project site that EGSL and ELL owns or controls.

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
Fuel Supply & Transportation	Bidder must have a viable plan for fuel supply and transportation capable of meeting the RFP's requirements for the resource, and provide reasonable support for the viability of the plan.	o The fuel supply and transportation plan should include (and provide reasonable support for the viability of) the project's fuel supply, source(s), transportation, storage (if applicable), and infrastructure for the delivery and processing of fuel for the resource. o Bidder must identify all available natural gas pipelines that would reasonably be considered candidates for interconnection with the project. o Bidder must provide an estimate of the cost to interconnect the resource with each natural gas pipeline that would be directly interconnected to the project. o Bidder must identify the natural gas pipeline interconnections covered in and supported by the project cost estimate, including the pipeline operating pressures and whether firm transportation capacity is available. For the RFP, the resource, if and when constructed, will be required to be interconnected to a minimum of two separate natural gas pipelines that would provide fully redundant gas transportation service for the resource. o Bidder must provide reasonable

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		evidence that the natural gas pipelines that would serve the project can provide adequate flexibility to ensure load-following capability of the proposed resource (*e.g.*, non-ratable service, swing capability, imbalance provisions), and adequate reliability. o Bidder must identify the pipeline easements and rights-of-way necessary for each pipeline interconnection covered in and supported by the project cost estimate.
Environmental Compliance, Assessment & Permitting	Bidder must provide a viable environmental compliance plan, including reasonable descriptions of Bidder's plan to engineer, design, develop, procure, build, test, own/lease, operate, maintain, and repair the project (including the project site) in compliance with all applicable environmental laws, permits, authorizations, and other requirements, and provide reasonable support for the viability of the plan. Bidder must show that due diligence has been completed and action plans established to a level sufficient to support all permitting activities.	o Bidder must provide a reasonable summary of the plan for complying with environmental laws and requirements applicable to the project. o Bidder must show that all permitting due diligence necessary to prepare to apply for all required permits has been completed (*e.g.*, a copy of the draft permit application(s) or a summary of the permit application requirements, including descriptions of the plan to meet those requirements and obtain the permit(s)). o Bidder must provide reasonably detailed plans to complete a Phase I environmental site assessment in

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		accordance with ASTM E1527-13 and evidence and documentation of due diligence specific to the proposed site sufficient to support such an assessment (*e.g.*, documentation of work necessary to meet the primary components required under a Phase I according to ASTM E1527) or, if completed, an accurate summary of such assessment. o Bidder must disclose any reasonably anticipated material permitting obstacles and any pending claim, action, or dispute related to permitting activities related to the resource. o Bidder must submit its reasonably detailed local community engagement and action plans related to permitting activities related to the resource.
Electric Interconnection/ Transmission Service	Bidder must have submitted a complete generator interconnection application ("IA") for the proposed resource in accordance with the MISO generator interconnection process. The resource must be able to be qualified as a designated network resource and fully deliverable.	o Bidder must provide a copy of the IA application submitted to MISO and MISO queue number. o Bidder's IA application must have sought (i) a quantity of energy resource interconnection service ("ERIS") from MISO sufficient for the resource to be fully deliverable and (ii) a quantity of network resource

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		interconnection service ("NRIS") from MISO sufficient to allow the resource to receive the maximum capacity credits a resource of its capacity size could receive under applicable MISO rules. o Bidder must provide a copy of the IA acknowledgement letter and/or IA study results from MISO. o Bidder must identify the substation(s) to which the project would be directly electrically interconnected. Note: Electrical interconnection and deliverability costs and risks associated with a resource may be an important part of the evaluation of proposals in the RFP. Bidders should be prepared to develop and provide detailed information about the electrical interconnection and deliverability costs and risks associated with their resources/proposals. Some of this information could require significant time and the expertise of one or more third parties to develop and prepare. Bidders will bear exclusive responsibility for obtaining and paying for electrical interconnection and transmission service for their proposed resource, including, without limitation, the costs of

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		interconnection upgrades and upgrades necessary for the required amounts of ERIS and/or NRIS for the resource, and for developing their proposals to include and account for, without limitation, all such upgrades.
Water Source, Treatment, and Disposal	Bidder must have a viable plan for access to adequate and sustainable supplies of water capable of meeting the maximum design requirements of the proposed resource at Summer Conditions, the treatment of water for the resource, and disposal of waste water, and provide reasonable support for the viability of the plan.	Bidder must describe the proposed primary source(s) and quality of the project's raw water supply, the physical and contractual requirements necessary to secure and properly utilize the water supply, the adequacy and availability of the water supply to meet the generating resource requirements at full load during Summer Conditions, the applicable water quality specifications for the resource and chemical or physical treatment requirements, and any reasonable available water supply and treatment alternatives. Bidder must also describe its wastewater disposal plan, which should include reasonable descriptions of the source(s) and type(s) of wastewater to be disposed of and the means and manner of disposal.
Project Structure & Finance	Bidder must have a viable plan for project structure and financing that is supported by recent experience and/or market intelligence.	o Bidder must describe the plan to finance the project, including a detailed description of any application for publicly subsidized loans, debt guarantees, tax relief, bonds, or other

Criterion	Minimum Requirement	Information Required to Evaluate Proposals against the Minimum Requirements
		public funding. o Bidder must describe the projected ownership structure of the Developmental Resource prior to the delivery term commencement date or closing (as applicable) and, if proposing a power purchase or tolling agreement, after the delivery term commencement date. o Bidder must be able to provide evidence of at least one recent successful project financing completed by Bidder, Seller, or the parent of Seller or that potential lenders have been engaged in initial, bona fide commercial discussions to ascertain interest, market conditions, and indicative terms. o Bidder must describe how it intends to meet the applicable credit/collateral requirements that will be specified in the RFP.

Bidders that fail to meet one or more of the Minimum Requirements may be required, at ESI's election (in consultation with the Independent Monitor), to provide, or to have Seller provide, supplemental security (i) as a condition to continued participation in the RFP and (ii) to support any letter of intent entered into by Seller (or a party acting on its behalf) in connection with the RFP. The security would be separate from, and in the case of clause (ii) above, incremental to, any letter of credit required to be posted in connection with clause (ii). The purpose of the enhanced collateral support would be to hedge the risk that Bidder (or Seller) will withdraw the proposal, will substantially

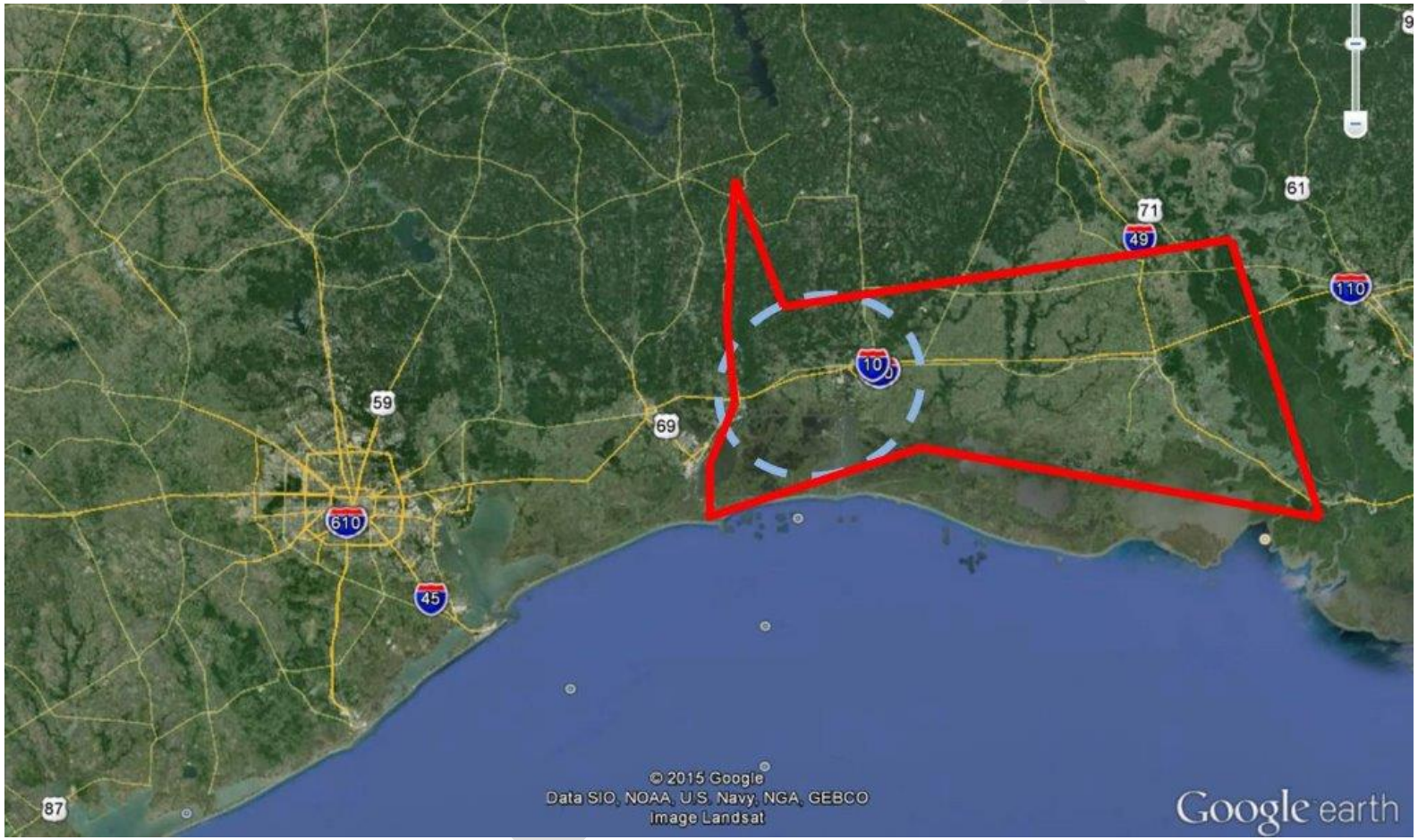
change the material terms of the proposal, or will be unable or choose not to honor the terms of the proposal prior to completing the negotiation of a Definitive Agreement between Seller and EGSL and ELL. The amount of the supplemental security would be determined by ESI on a case-by-case basis and would be dependent upon its assessment of the Minimum Requirements not satisfied by Bidder. ESI's assessment would take into consideration evidence provided by Bidder that it has been using, continues to use, and will continue to use good faith efforts to meet the Minimum Requirements that Bidder has failed to satisfy. The amount of supplemental security a Bidder may be required to post would not exceed $5 million.

If called upon to post supplemental security, Bidder will have the option either to post (or have Seller post) the required amount of supplemental security or to withdraw the proposal(s) that failed to meet the Minimum Requirements from the RFP. The proposal(s) of any Bidder that posts the required amount of supplemental security according to the terms of the RFP will be allowed to remain in the RFP, subject to compliance with the other participatory terms of the RFP.

Supplemental security posted as a condition to continued participation in the RFP may be replaced with other security upon execution of a definitive agreement between Seller and EGSL and ELL. If Bidder is required to post supplemental security pursuant to clause (i) above and (a) is not selected for negotiation or potential negotiation of a definitive agreement with EGSL and ELL or (b) is selected but is subsequently released from its proposal(s) as allowed for in the RFP, the supplemental security will be returned to Bidder, subject to and in accordance with the terms of the RFP and the letter of credit. EGSL and ELL will have no obligation to return and may retain any and all funds drawn under the letter of credit in accordance with the terms thereof.

Attachment 1 to Minimum Requirements

MAP OF EGSL'S SERVICE AREA IN WOTAB



APPENDIX B

Wayne J. Oliver

Merrimack Energy
155 Borthwick Ave., Suite 101
Portsmouth, NH 03801
(603) 427-5036
waynejoliver@aol.com

A Management Consultant with a diverse background in the energy field. Areas of expertise include power procurement and contracting, strategic planning, asset valuation, power project evaluation, energy supply/demand forecasting and planning, competitive fuels analysis, risk management, rate analysis and expert testimony, regional energy market analysis, and project economic and financial analysis. Focus on electric, gas and renewable resource industries.

PROFESSIONAL EMPLOYMENT

2000-present	**Merrimack Energy Group,** Principal
1988-2000	**Reed Consulting Group/Navigant Consulting, Inc.** Managing Director/Senior Vice President/Founder of Reed
1999	**Babson College**, Adjunct Professor, Finance Department
1984-1988	**R.J. Rudden Associates, Inc.** Senior Consultant
1983-1984	**Massachusetts Executive Office of Energy Resources** Consultant
1981-1983	**Algonquin Gas Transmission Company** Corporate Planner
1980-1981	**Massachusetts Executive Office of Energy Resources -- Analysis and Regulations Program** Assistant Director
1978-1980	**New England Regional Commission -- Energy Policy Analysis Program** Coordinator/Senior Economist

PROFESSIONAL EXPERIENCE

Power Procurement/Competitive Bidding

Served as Independent Evaluator, Monitor or Consultant for approximately 60 competitive procurement assignments on behalf of utilities, regulatory agencies and public organizations, serving as Independent Evaluator or in a similar function. As Independent Evaluator responsible to ensure the competitive procurement process is undertaken in a fair and unbiased manner. Assisted a number of utilities in the development and implementation of competitive bidding processes and associated RFPs for long-term supply-side resources, renewable resources, option contracts, distributed resources and demand-side resources. Evaluated hundreds of power supply proposals for a wide range of power generation technology options and contract structures.

Directed a major study for a large electric utility involving the development of a viability methodology for assessing non-utility generation projects. The approach involved the use of Critical Path methodology to assess project status and probability of success

Independent Evaluator or Independent Monitor for a number of power solicitation or competitive bidding processes including: Southern California Edison, Pacific Gas & Electric, PacifiCorp, Arizona Public Service Company, Avista Utilities, Delmarva Power, El Paso Electric, Baltimore Gas and Electric, Duke Power, Hydro-Quebec (Baseload and Dispatchable Supply, Wind, Biomass, Cogeneration, and several Short-Term Call for Tenders), Portland General Electric, BC Hydro, Central and SouthWest Services (five separate RFPs), Commonwealth Edison, Public Service Company of Oklahoma and Southwestern Electric Power Company RFPs for power supplies.

Assisted Hawaiian Electric with the company's policy associated with the design of competitive procurement rules in Hawaii. Testified for four days on industry practices associated with competitive procurement processes.

Project Manager responsible for designing and developing supply side RFPs for several electric utilities including Boston Edison, Central and South West Services, Inc., Commonwealth Edison Company, Duke Power, Carolina Power & Light, and Hydro-Quebec.

Assisted in the preparation of power supply bids on behalf of utility and non-utility clients for a number of utility solicitations.

Assisted several utilities with the design and development of an evaluation methodology and development of contract terms for RFP's for Power Options. Managed the development of an options pricing model to evaluate bids received.

Renewable Resources

Developed renewable resource RFPs and assisted in bid evaluation for Hydro-Quebec Distribution (1000 MW Wind and 100 MW Biomass), Avista Utilities, Massachusetts Technology Collaborative, Portland General Electric (wind, geothermal, and biomass proposals), Central Power & Light Company (wind only RFP), Public Service Company of Oklahoma, Southwestern Electric Power Company, West Texas Utilities, and Hawaiian Electric Company. Served as Independent Evaluator for several renewable resource solicitations including Pacific Gas & Electric, Arizona Public Service, and PacifiCorp.

Chaired two major conferences on green pricing initiatives and renewable resource development

Asset Valuation

Conducted due diligence analysis for several banks regarding the potential financing for merchant power projects, gas storage projects, and gas pipeline assets.

Conducted asset valuation analysis for utilities and power generators interested in acquiring power generation assets. Analysis included valuation of gas-fired combined cycle and combustion turbines (CTs), coal projects, hydroelectric facilities, power contracts, pipeline capacity commitments, and electric transmission assets.

Competitive Energy Pricing

Negotiated several special contracts with unique pricing arrangements between utilities and customers.

Developed a market price evaluation methodology and pricing process for a large electric utility for wholesale and retail marketing initiatives.

Developed approach for resource procurement in a competitive electric market based on portfolio design, which incorporates short and long term resources, flexible contract provisions and option pricing concepts.

Risk Management

Conducted seminars for utilities on the use of risk management techniques and financial derivatives to
hedge risks, including the use of options, futures and swaps. Applied financial option techniques in the development of physical option arrangements.

Developed a risk management strategy for a major electric utility to hedge its fuel and power trading price risk.

Fuel Supply Acquisition Strategy and Procurement

Assisted several local distribution companies (LDCs) and electric utilities with gas procurement activities including direct purchases from suppliers. Activities included

development of a supply portfolio plan, design of an RFP for gas supplies, assessment of the need for price and nomination flexibility for contracting, development of the evaluation criteria, and review and evaluation of proposals submitted. Participated in RFP's for both U.S. and Canadian supplies. Responsible for the evaluation of over 100 proposals for gas supply.

Assisted independent power producers and cogenerators with development of fuel purchase strategies, and implementation of the strategy including identifying producers, suggesting a course of action and negotiation of the fuel purchase contracts and transportation pricing terms and conditions.

Completed gas procurement strategies and portfolio designs for several electric utilities. Responsibilities included evaluating pipeline and storage options, developing a procurement strategy, and recommending a course of action. The projects involved integrating the production cost and operations of the generation units with gas supply and transportation contracting considerations to develop a least cost strategy.

Energy Market and Economic Policy Studies

Conducted a number of studies for utility and non-utility clients on the market for power in various regions of the US and in Canada.

Directed merchant power study for an Independent Power Producer assessing the market price of power for the uncommitted capacity from the project as a form of merchant power. Study components included analysis of the competitive market price in both the short and long term, definition of need for capacity and energy, risk assessment of key market factors, and project dispatch analysis.

Assisted in the completion of a gas market study for a proposed natural gas pipeline project assessing the potential of the Northeast market for Canadian gas.

Conducted several market studies and power price forecasts in support of due diligence efforts for acquisition of power generation assets.

Utility Restructuring

Managed several projects for electric and gas utilities on industry restructuring and unbundling initiatives.

Presented seminars to utilities, trade organizations and conferences on electric utility restructuring strategies and implementation.

Advised senior management of electric utilities on evaluating and developing strategies for enhancing the value of the utility’s assets. Also assisted several utilities in the development of GENCO strategies.

Strategic Planning and Analysis

Assisted in a strategic planning study for a major international coal company with the goal of developing strategies to increase market share within the electric power industry.

Completed a strategic planning study for a major electric utility assessing the opportunities for the company in the changing natural gas market, including fuel purchasing strategies, and gas fired cogeneration and combined cycle opportunities.

Prepared economic forecasts and strategic plans for a gas transmission company.

Conducted several seminars for senior management of pipeline companies and electric utilities on opportunities and challenges for gas use in electric generating facilities.

Assisted several local gas distribution companies with development and implementation of gas supply/transportation procurement strategies in response to FERC Order No. 636.

Forecasting and Modeling

Managed the development of a monthly demand forecasting model for each rate class for LDCs using both econometric and end-use modeling techniques as part of its integrated resource planning process.

Developed integrated planning and forecasting system for a small electric utility. The system was comprised of production cost, generation planning, cost of service, demand forecasting and rate design modules.

Assisted in econometric research study of the capital structure of a large combination utility.

Developed an electric rate forecasting model integrating production cost projections with a cost-of-service model for a large industrial client for purposes of projecting the electricity costs for the utility over a five-year time horizon.

Managed a number of projects and utilized several production cost and generation expansion models for evaluation of power supply proposals and resource options.

Cost of Service/Rate Design

Submitted testimony before the Federal Energy Regulatory Commission on pipeline rate and cost allocation issues in Penn York Energy Corporation and Great Lakes Gas Transmission Limited Partnership rate cases.

Replicated and critiqued several electric and gas cost of service models for rate case intervention dealing with cost allocation, revenue requirements and rate design issues.

Financial Analysis

Assisted utilities in the financial analysis of distributed resources for the purposes of establishing a distributed generation (DG) business unit.

Assisted in the preparation of financial and economic feasibility studies of power generation projects for a consortium of banks.

Prepared several financial prefeasibility studies of proposed power generation projects for utilities, independent power producers and industrials.

Directed several studies on power needs and competitive costs of power supply options for large independent power producers for project applications before regulatory authorities.

EDUCATION

Northeastern University, Completed Doctoral Course work, Economics, 1977
Northeastern University, M.A., 1976
Assumption College, B.A., 1973

OTHER

Past Chairman, Massachusetts Natural Gas Task Force.

Adjunct Professor, Department of Finance, Babson College; Courses taught include Risk Management (MBA Program), Options and Futures

Instructor/Lecturer, Department of Economics, Northeastern University; Statistics, Energy Economics, Forecasting Techniques, International Economics.