

**AVISTA CORPORATION  
REQUEST FOR INFORMATION  
INDEPENDENT EVALUATOR SERVICES**

**RESPONSE PROVIDED BY**

**PROCURE POWER, LLC**

**DECEMBER 12, 2024**

## TABLE OF CONTENTS

INTRODUCTION .....	3
EXPERIENCE AND CAPABILITIES .....	4
PROPOSAL .....	6
Project Approach .....	6
Washington State Independent Evaluator Responsibilities.....	7
Project Deliverables .....	7
PRICING.....	8
CONCLUSION .....	9
RESUMES .....	9

## INTRODUCTION

I am pleased to provide you with this proposal in response to your Request for Information for Independent Evaluator services. I have supported a number of clients on resource RFPs and acquisition efforts, including Avista's own 2021 All Source Requests for Proposals which was performed with my former company, Sapere Consulting. Earlier this year, I left Sapere and established my own consulting firm, Procure Power, LLC ("Procure Power"). Procure Power is a sole proprietorship, and I am the only employee. I remain dedicated to helping energy industry clients evaluate and manage their power supply portfolios. For this project, I propose to use a sub-consultant, Laura McCarty, to provide robust and high-quality service to Avista throughout the RFP process. I have known and worked with Laura for 20 years and she provides a deep understanding of the northwest electric utility business although from a slightly different perspective.

Given my experience working with Avista, we will be able to provide high-quality and cost-effective support throughout your RFP process. We are also familiar with the laws and regulations that guide the Independent Evaluator of such resource RFPs in the state of Washington.

Additional details summarizing our experience and capabilities are in the following sections of this response. Please contact me if you have any questions. We look forward to hearing from you.



Steven E. Lewis  
Owner and Consultant  
Procure Power, LLC

## EXPERIENCE AND CAPABILITIES

The following short biographical sketches provide a summary of each of the proposed team members, Steve Lewis and Laura McCarty highlighting experiences that is relevant to the Avista Independent Evaluator role. Full resumes are also enclosed.

Name and Education	Selected Experience
<p><b>Steve Lewis</b></p> <p><b>Education</b> Gonzaga University, Spokane: Bachelor of Science, Physics &amp; Mathematics Magna Cum Laude</p>	<p>Steve Lewis, as an energy industry consultant since 2001 has expertise in all areas of power trading, power management and utility operations, including asset optimization, risk management, power resource planning and acquisition, power plant development and acquisition, transmission contracting and issues, hydro operations, and balancing authority area operations. Steve has supported numerous northwest electricity transactions, including structured solicitations for resources or specified energy products. Projects of particular interest led by Steve include:</p> <ul style="list-style-type: none"> <li>● Provided Independent Evaluator services to Avista for their 2022 All-Source Request for Proposals (“All-Source RFP”). As Independent Evaluator, Mr. Lewis helped to develop the All-Source RFP materials, reviewed and evaluated all proposals submitted into the RFP, participated in the utility evaluation process, and attested that the process was fair and transparent. All of this work followed the responsibilities spelled out in the Washington Administrative Code. A final report summarizing the process was submitted to the Washington Utilities and Transportation Commission.</li> <li>● Analyze the impacts the Washington Clean Energy Transformation Act (“CETA”) would have on a natural gas fired combined heat and power facility and advice the client on strategies to address the changes CETA will require of electric utilities who purchase the output of their facility.</li> <li>● Provide a current market valuation of a wind project and advise the owners of the project of the potential benefits and risks associated with changing their proportion of interest in the project. The analysis includes research into the land control, facility condition, and transmission rights associated with the project as well as the potential value of a repowering opportunity.</li> <li>● Support the Renewable Energy Wildlife Institute in the deployment of their CREST Project. CREST, which stands for Clean and Reliable Energy Siting Tables seeks to deploy interest-based negotiating principles to the stakeholder engagement processes needed for siting new transmission facilities. Mr. Lewis provides utility expertise to the project and is helping with the facilitation process for a potential wind development site in the Pacific Northwest.</li> <li>● Supported the development of business processes for the Western Power Pool (“WPP”) Western Resource Adequacy Program (“WRAP”). Reviewed and edited business process documents based on the WRAP tariff language and understanding of the operation of the western power grid and power markets.</li> <li>● Facilitate solicitations for Montana Community Renewable Energy Projects (CREP) on behalf of NorthWestern Energy. Most recently, Sapere was responsible for drafting, issuing and managing all aspects of the 2018 CREP RFP, from initial planning through the selection of finalists and the negotiation of definitive agreements. NorthWestern Energy is an investor-owned electricity and natural gas utility serving Montana and South Dakota. Managing the CREP RFP on behalf of NorthWestern Energy requires expert knowledge of Montana statutes and regulations, an understanding of NorthWestern’s power and energy needs, as well as their portfolio modeling and valuation processes and their risk policies and</li> </ul>

	<p>tolerances. Sapere will also support NorthWestern in any filings with the Montana Public Utility Commission resulting from the CREP RFP process.</p> <p>Prior to his time as a consultant, Steve was a Power Marketer with Seattle City Light from 1999 to 2001 and the Lead Electricity Trader at Puget Sound Energy from 1990 to 1999.</p>
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Name and Education	Selected Experience
<p><b>Laura McCarty</b></p> <p><b>Education -</b> University of Illinois - Chicago, Bachelor of Science - Mathematics and Computer Science</p>	<p>Laura is an independent consultant who has worked with western energy clients for many years. Selected experience includes:</p> <ul style="list-style-type: none"> <li>● Consulting experience with 2 of the largest consultancies in the US: Accenture and Deloitte Consulting</li> <li>● Developed RFPs and conducted associated software selections for power trading organizations, utilizing scripted demonstrations with leading vendors in power trading, risk management, and scheduling - including all relevant selection criteria - operational, risk, cost, and staffing/training needs</li> <li>● Developed strategic plans and software portfolio roadmaps for large utilities, including over 50 major software initiatives covering Demand Response, Distributed Generation, and Market interface updates</li> <li>● Led the implementations of large energy trading and market interface systems for major West Coast utilities and energy retailers, including power trading, risk management, scheduling and settlement software. Includes regulated and non-regulated organizations, including utilities, transmission providers, energy retailers and energy marketers</li> <li>● Defined business process models (BPMs) and requirements for large utilities in areas of bi-lateral and CAISO energy trading, power scheduling, reconciliation, settlements, and risk analytics</li> <li>● Expertise in California ISO modeling for pre-scheduling, real-time scheduling, and settlements</li> <li>● Experience in modeling transmission and OASIS interfaces for transmission users and providers</li> <li>● Proficient in creating operational reports and procedures for risk reporting, wholesale customer billing, and market settlements along with profitability and operational metrics and analytics</li> <li>● Skilled in modeling bi-lateral energy contracts and generation assets.</li> </ul>

## PROPOSAL

### Project Approach

We plan to follow the process that was deployed for Avista's 2021 All-Source RFP. This will include the following, which are broken into the two major tasks Avista identified in the RFI:

#### Task 1: Preparation for the Resource RFP

- 1) Review of Solicitation Rules and Guidelines: This should be relatively quick as we are up to speed on the current rules and regulations as they apply in Washington State.
- 2) Review Avista Integrated Resource Plan: Again, this should be an update to get up to speed on the information in Avista's latest IRP, including changes that may have occurred since the prior IRP including changes to market conditions and expected resource availability.
- 3) Participate in RFP Design including Scoring Matrix: We will support Avista in the review and drafting of RFP materials. This will incorporate thoughts and lessons learned from the last RFP and incorporate findings from the latest IRP. We will also review the RFP materials and scoring process from the perspective of Washington code compliance to help ensure that the process is being set up to meet those requirements.
- 4) Review Avista models: We will review the models that Avista plans to use for the financial and operational forecasting of the proposals and provide feedback and input on the models and the inputs used in these models.

#### Task 2: Monitor the Resource RFP and Evaluate Proposals

- 5) Monitor the solicitation: Actively monitor the solicitation process to ensure that Procure Power representative can attest that the process itself was fair and managed in accordance with regulations, the RFP rules, and industry standards.
- 6) Proposal Evaluation: As was done last time, we will review all the proposals submitted to Avista and perform our own scoring of the proposals in accordance with the prepared scoring matrix. Our scoring will be compared to the scoring performed by Avista staff prior to milestone screening steps (shortlisting, final selections, etc.) and discrepancies resolved and/or addressed.
- 7) Reports: Procure Power will prepare a final report summarizing our participation, observations, and overall attestation regarding the quality, fairness, and transparency of the RFP process.
- 8) Availability to meet with WUTC staff or attend WUTC meetings: Laura and Steve will be available to meet with and discuss the process with WUTC staff as needed by Avista. Either will also be available to attend meetings of the WUTC, either in-person or remotely as needed. This would include offering

We plan to deploy both Laura and Steve throughout this process to ensure Avista is provided with reliable and timely support in the administration of the RFP process. For the Proposal Evaluation step, we also propose that both of our staff score proposals independently internally at Procure Power and then resolve differences as our own process of ensuring thorough review of the proposals before doing

the comparative step with Avista staff. We have found that this process is a good way ensure a rigorous evaluation.

### Washington State Independent Evaluator Responsibilities

There are specific requirements of Independent Evaluators spelled out in the Washington Administrative Code. The project approach follows these requirements, and we will reference the regulatory requirement throughout the process to ensure compliance. These responsibilities are summarized as follows:

- 1) Ensure that the RFP process is conducted fairly, transparently, and properly;
- 2) Participate in the design of the RFP;
- 3) Evaluate the unique risks, burdens, and benefits of each bid;
- 4) Provide to the utility the independent evaluator's minutes of meetings and the full text of written communications between the independent evaluator and the utility and any third-party related to the independent evaluator's execution of its duties;
- 5) Verify that the utility's inputs and assumptions, including capacity factors and capital costs, are reasonable;
- 6) Assess whether the utility's process of scoring the bids and selection of the initial and final shortlists is reasonable;
- 7) Prepare a final report to the commission after reconciling rankings with the utility in accordance with WAC 480-107-035(3) that must:
  - a. Include an evaluation of the competitive bidding process in selecting the lowest reasonable cost acquisition or action to satisfy the identified resource need, including the adequacy of communication with stakeholders and bidders; and
  - b. Explain ranking differences and why the independent evaluator and the utility were or were not able to reconcile the differences.

### Project Deliverables

The following table provides a complete list of project deliverables which will be provided to Avista in electronic form. The expected format for each is indicated.

Deliverable	Description
Meeting minutes	Procure will provide minutes of all meetings between Procure Power and Avista staff. PDF format.
Written Communications	All written communications between Procure Power and Avista will be preserved and provided to Avista for their record retention purposes. .EML format.
Final Report	A final report that summarizes the participation in the RFP, the independent scoring of proposals by Procure Power, and an attestation as to the fairness of the process. PDF format.
Related Materials	Any related materials, including scoring matrixes in their functional electronic form. MS Excel, Word, Etc.

**PRICING**

The tables below provide a detailed cost estimate. This estimate does not include meetings with WUTC staff, attending their public meetings, or preparation of any regulatory testimony that might be required at the conclusion of this project. Estimates for proposal evaluations and scoring are based on the time required per proposal and so the table provides scaled estimates depending on different assumed numbers of proposals submitted in response to your resource RFP. The total combined estimate ranges from a low of \$ [REDACTED] for 20 proposals to a high of [REDACTED] for 50 proposals received. These are best estimates based on our experience working on resource RFPs and do not include any contingency, which can be worked out at the time of our contracting. We have also assumed that all meetings can be supported remotely with the Avista team and have not included any travel or other reimbursable expenses.

**Task 1 Estimate:**

\$ [REDACTED]
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**Task 2 Estimate:**

Number of Proposals		Estimate	
20	\$	[REDACTED]	
30	\$	[REDACTED]	
40	\$	[REDACTED]	
50	\$	[REDACTED]	

**Total Task 1&2 Estimate:**

Number of Proposals		Estimate	
20	\$	[REDACTED]	
30	\$	[REDACTED]	
40	\$	[REDACTED]	
50	\$	[REDACTED]	



## CONCLUSION

We are pleased to offer this proposal in response to your Request for Information and I am excited about the opportunity to work with Avista on this important project. I believe you will find that we offer a highly competitive set of Independent Evaluator services that mesh well with the criteria identified in your RFI. The following table provides a quick summary of how our proposal meets all the specified criteria.

Criteria	Note
Washington CETA, WA Equity Requirements, and Purchase of Resource rules, knowledge, and expertise	Prior experience working on these issues with Avista in last resource RFP and with other clients.
Resource Adequacy/Effective Load Carrying Capacity expertise	Long history of working with utilities on resource planning and recently worked with the Western Power Pool on establishing their WRAP business procedures.
Price for assistance with RFP design and evaluation method	Estimate of [REDACTED]
Price for RFP evaluation and report	Estimate ranges from \$ [REDACTED] to \$ [REDACTED] depending on the number of proposals submitted.
All-Source RFP experience	Direct experience having worked with Avista on the 2022 All-Source RFP. Have also facilitated Northwestern Energy in their All-Source RFPs in both Montana and South Dakota.
Northwest market experience	Have actively traded in the northwest energy markets or helped clients to trade in the markets since the 1990s.

We believe we are uniquely qualified to support Avista as the Independent Evaluator in their next All-Source RFP. We hope that you agree and look forward to working with you.

## RESUMES

Resumes for Steve Lewis and Laura McCarty are enclosed on the following pages.

**STEVEN E. LEWIS**

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SLewis@Procure-Power.com ♦ 206-290-6059

**SUMMARY OF QUALIFICATIONS**

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34 years of professional experience in the northwest energy industry. Leadership and expertise in all areas of utility operations, including energy trading, risk management, power resource planning and acquisition, power plant development and acquisition, transmission contracting and operations, hydro operations, control area operations, and state and federal electricity regulations.

**PROFESSIONAL EXPERIENCE**

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**PROCURE POWER**

Seattle, Washington

February 2024-Present

*President & Owner*

Procure Power provides consulting services to the bulk energy industry with a focus on electricity supply contracts, resource portfolio management, and grid/utility operations. Mr. Lewis is supporting clients through the following projects:

- Analyze the impacts the Washington Clean Energy Transformation Act (“CETA”) would have on a natural gas fired combined heat and power facility and advise the client on strategies to address the changes CETA will require of electric utilities who purchase the output of their facility.
- Provide a current market valuation of a wind project and advise the owners of the project of the potential benefits and risks associated with changing their proportion of interest in the project. The analysis includes research into the land control, facility condition, and transmission rights associated with the project as well as the potential value of a repowering opportunity.
- Support the Renewable Energy Wildlife Institute in the deployment of their CREST Project. CREST, which stands for Clean and Reliable Energy Siting Tables, seeks to deploy interest-based negotiating principles to the stakeholder engagement processes needed for siting new transmission facilities. Mr. Lewis provides utility expertise to the project and is helping with the facilitation process for a potential wind development site in the Pacific Northwest.

**SAPERE CONSULTING**

Seattle, Washington

March 2016-January 2024

*Energy Solutions Practice Lead & Part Owner*

Mr. Lewis’ clients include the US Army Corps of Engineers, Yakima-Tieton Irrigation District, EDF Renewable Energy, NorthWestern Energy, the Warm Springs Tribes, Chelan Public Utility District and others. Mr. Lewis has led and actively worked on the following projects:

- Provided Independent Evaluator services to Avista for their 2022 All-Source Request for Proposals (“All-Source RFP”). As Independent Evaluator, Mr. Lewis helped to develop the All-Source RFP materials, reviewed and evaluated all proposals submitted into the RFP, participated in the utility evaluation process, and attested that the process was fair and transparent. All of this work followed the responsibilities spelled out in the Washington Administrative Code. A final report summarizing the process was submitted to the Washington Utilities and Transportation Commission.
- Facilitated an extension of a sale of the hydro-electric output of the Wells project for the Confederated Tribe of the Colville. The facilitation includes a review of the market value of the output, including the value for carbon-free electricity and the capacity value of dispatchable hydropower. Based on the advice of Mr. Lewis, the Colville Tribe was able to gain concessions from the buyer and locked in considerably more value than in their prior sales agreement.
- Supported the development of business processes for the Western Power Pool (“WPP”) Western Resource Adequacy Program (“WRAP”). Reviewed and edited business process documents based on the WRAP tariff language and understanding of the operation of the western power grid and power markets.
- Negotiated a two-year sale of output from a natural gas combined-cycle cogeneration facility. The sales process involved running a quick targeted solicitation to interested parties. The process resulted in a sale to different purchaser than the incumbent off-taker at the time and for a considerable financial gain for the project owner. Since the project is in Washington State, the sales process had to address the regulatory impacts of the Washington State Clean Energy Transformation Act (“CETA”) and the Climate commitment Act (“CCA”).
- Provide owner and purchaser representation to a group of public utilities taking the output from the White Creek and Harvest Wind projects. White Creek is a 204 MW wind project owned by tax-equity partners which is sold to 6 public utilities under long-term power purchase agreements. Harvest Wind is a 99 MW expansion of the White Creek project and is jointly owned by four northwest public utilities. Mr. Lewis represented all eight utilities (two White Creek purchasers are also Harvest owners). Representation responsibilities were varied and included working closely with the site management company and the White Creek owners on annual budgeting, monthly operations reviews, management of scheduling issues that arose with BPA, planning for contract expiration, and evaluating offers to purchase the projects. Likely the oddest responsibility was a review of a currency hedge to manage the utilities’ exposure to Danish Kroner price fluctuations embedded in their service contract. A five-year Kroner to US Dollar hedge was successfully put in place.
- Develop a marketing strategy for developer planning to build nuclear energy facility in the Western Interconnection. The developer was working on a new design nuclear energy facility using a small modular design and had an anchor tenant but needed additional off-takers to justify the continued development of their project. Our work comprised a detailed review of potential off-takers in the west and provided advice on

how best to ramp up sales efforts, including cooperating with utility integrated resource planning and working with state utility commissions. Ultimately, the client was unable to move forward with their development plans in the west.

- Led the review, analysis, and preparation of a proposal by Seattle City Light to provide wholesale management for another northwest utility's generation and load. The other utility's portfolio includes a run-of-river hydroelectric project, contractual rights in another hydroelectric project with limited shaping capability and a Bonneville Power Administration ("BPA") Shaped Block power purchase agreement. The analysis established the potential value to Seattle of the management services and identified wholesale market risk factors, including transmission and market price exposure.
- Negotiated a long-term sales agreement for the output of two small hydro projects for the Yakima-Tieton Irrigation District ("YTID"). YTID was under tremendous pressure to complete the sale before the local investor-owned utility reduced their filed avoided cost rates for Washington State. Mr. Lewis successfully pressured the utility to complete the contract execution in a timely manner by applying consistent pressure on the utility staff, creating a record of YTID's conformance to proper contracting processes, and targeting communications to the Washington Utilities and Transportation Commission.
- Provide expert evaluation of the modelling by the US Army Corps of Engineers and BPA supporting the Columbia River Systems Operations review ("CRSO"). The CRSO employed a hydrological modeling process to test different hypothetical operational changes to the management of the federal dams on the Columbia and Snake River systems. The model structures were quite complex and included one Corps model (RESSIM), two BPA models (HYDSIM and HOSS), and one model used by the Pacific Northwest Power and Conservation Council (GENESYS). The review supported the issuance of a Record of Decision in September 2020.
- Provide expert peer review service to the U.S. Department of Energy Water Power Technologies Office ("WPTO") for their Fall 2019 Peer Review process. The 2019 Peer Review included numerous projects in the WPTO Hydropower and Marine/Hydrokinetics Programs. Mr. Lewis evaluated projects in the Hydropower Program as a member of the New Technology and Modernization review panel. Areas of interest for these projects included use of composite materials in hydro turbine runners and creative approaches to reduce long-term costs for low-head and low-flow hydropower development opportunities.
- Facilitate NorthWestern Energy's yearly Community Renewable RFPs from 2016-2020 seeking additional Montana in-state community-owned renewable resources. The RFPs garnered interest from small hydro, wind, solar and energy storage facilities. RFP reviews included detailed proposal scoring and the financial modelling of the project proposals to determine the net financial costs/benefits to NorthWestern. Coordinate closely with both NorthWestern staff and the RFP respondents to ensure a smooth process and retain records and reports in preparation for NorthWestern's filings with the Montana Public Service Commission. Mr. Lewis has offered testimony to the Commission numerous times.

- Provide project leadership for Chelan PUD's implementation of new optimization systems to better dispatch the Rocky Reach and Rock Island hydro-electric projects on the Columbia River near Wenatchee, WA. This project requires careful planning and deployment of new sophisticated hydroelectric management and dispatching software in a high-reliability environment. Mr. Lewis investigated the cost and benefits of increased reservoir fluctuations, has developed water and energy accounting processes for the new systems and has analyzed the changing business process needs as a result of the new system and the potential impacts on staffing requirements.
- Provide independent engineering services to the Warm Springs Tribes to support their issuance of bonds for the purchase and ownership of one-half of the Pelton-Round Butte hydro-electric projects in Central Oregon. The Warm Springs purchased their project ownership from Portland General Electric who continues to operate the projects. As independent engineer, our financial projections, including expected revenue from electricity production and sales, ensure sufficient funds are available to meet bond payment schedules and are used by potential bond purchasers to evaluate the offering.
- Support developers of renewable energy projects by facilitating interconnection processes to local utilities and marketing efforts targeting long-term purchase agreements for both the power and environmental attributes of the projects. The services require detailed working knowledge of the northwest grid, transmission congestion, and understanding the potential for changes brought about by market transformation.
- Evaluate sites throughout the western US for their suitability for renewable generation projects such as wind and solar for a large multi-national mining company. Evaluations have included reviews of all aspects of a site's suitability including determining the amount of energy that might be produced at a specific site, the cost of infrastructure required, grid interconnection and delivery costs, output marketing opportunities, and land use regulations.
- Evaluate Wyoming-based wind project proposals for Pacific Power. The evaluation was specifically targeted to the forecasted energy production for 12 different project proposals responding to Pacific Power's resource RFP.

#### **LANDS ENERGY CONSULTING**

Seattle, Washington

2001-March 2016

#### ***Principal Consultant & Owner***

A partial list of clients includes: NorthWestern Energy, The Energy Authority, the Confederated Tribes of the Colvilles, The BPA Slice Customers (18 northwest public utilities), Snohomish PUD, and Seattle City Light. Key projects Mr. Lewis has led include:

- Facilitate numerous structured resource solicitations including RFPs for NorthWestern Energy. These resulted in completed purchase contracts for the 40 MW Spion Kop Wind Project and the 135 MW Judith Gap Wind Project (both in Montana) and the 25 MW Titan I Wind Project (South Dakota). Mr. Lewis actively negotiated contract terms and conditions with the project developers on behalf of NorthWestern

Energy and supported the process all the way through the regulatory approval process with the Montana Public Service Commission.

- Facilitate multi-million dollar one- and two-year sales of hydroelectric output of the Wells dam in central Washington for the Confederated Tribe of the Colvilles. The sales went to numerous purchasers and have included minute-to-minute dispatch flexibility as a value driver. Sales have been facilitated through competitive processes and have required close coordination with the project operator and the potential purchasers.
- Support the use and development of detailed hydro-electric water routing and optimization software employed by The Energy Authority ("TEA"). TEA uses the software to schedule power from the BPA Slice contracts for 9 full service utility customers and allows 3 additional utility customers to directly access the software to schedule their Slice contracts. The software optimizes water flow and power production from 10 federal projects to which Slice customers have contractual rights, including Grand Coulee, Chief Joseph and eight federal hydroelectric projects on the Lower Snake and Lower Columbia Rivers. Support by Mr. Lewis included detailed troubleshooting of optimization routines and analysis and review of the proper functioning of the software. Mr. Lewis also supported the development of Slice operating strategies for both the long and short-term and developed improved business processes at TEA ensuring the proper deployment of the software optimization models by TEA's realtime trading staff.
- Guide the development of risk management strategies and trading/scheduling practices for northwest hydroelectric based utilities, including Snohomish PUD and Seattle City Light. Snohomish PUD owns and operates the Jackson project, which is primarily a water supply project with power generation as a secondary output. They also purchase the largest amount of Slice contract power from BPA, which provides Snohomish with the flexibility and decision-making responsibility associated with a 5% share of BPA's generating capability. Seattle City Light is 90% hydroelectric.
- Lands Energy has also supported clients in the development of operating, marketing and scheduling strategies for renewable energy, including non-dispatchable resources such as wind and solar project output.

**SEATTLE CITY LIGHT**  
Seattle, Washington  
*Power Marketer*

1999-2001

- Directed all within-month marketing in conformance with the overall utility resource hedging strategy. Ensured a short-term operation of Seattle's generating assets optimizing their economic value within operating, regulatory, and reliability constraints. Included in Seattle's portfolio was over 2,000 mw of hydro-electric generating assets, multiple long-term contracts for power purchases/sales, 1,312 mw of long-term firm transmission rights on the BPA main grid, and 160 mw of capacity

ownership on the NW/SW AC Intertie. The hydroelectric assets include a number of large storage and run-of-river projects (Boundary, Ross, Diablo, and Gorge) as well as two smaller storage projects with first purpose water supply uses (Cedar River and Tolt River Projects). Built an operations model for the larger hydroelectric projects allowing Seattle's energy traders to accurately plan the operation of those projects and to buy or sell energy for future hours or days as needed to properly balance Seattle's system.

- Negotiated the operating provisions of the first BPA Slice Agreement. This included the determination of the modeling process that would be used to determine Seattle's rights to capacity and energy in near-term planning and operations down to real-time determination of schedules of power from BPA to Seattle. The modeling process represented the BPA Slice system flexibility which Seattle purchased under a 10-year contract.
- Led the negotiation for purchase of a 10-year power purchase contract from the Klamath Falls cogeneration project, including the execution of the first gas derivative hedge by Seattle City Light designed to mitigate the gas price exposure contained in the electricity purchase contract.

**PUGET SOUND ENERGY**  
Seattle, Washington

1990 - 1999

*Senior Electricity Trader (Title upon departure)*

- Puget's designated operations liaison with Duke Energy during the Puget/Duke operating and trading alliance. Coordinated trading and marketing activity between Duke's trading floor in Salt Lake City and Puget's trading floor in Bellevue. Worked with Duke's origination staff in the marketing of non-standard product offerings within the Northwest. Reviewed the modeling of Puget's resource assets and evaluated the performance of the resulting hedging transactions.
- Prior to the alliance with Duke, developed Puget's forward electricity trading operation. Initiated Puget's trading through the brokered over-the-counter electricity markets for western points of receipt. Helped establish and develop fundamental analysis techniques to support trading efforts. Trading goals for Puget included both hedge trading around their existing asset base and speculative trading within a well-defined value-at-risk mechanism.
- Developed and maintained operational models for the optimization of Puget's hydroelectric generating projects. This included both spreadsheet tools and coding of computer programs to meet refill, flood control, and reliability uses of the projects while maximizing the financial value. Projects included the Upper and Lower Baker projects, the White River project, Snoqualmie Falls, as well as over 1,000 MW of participant rights in the five non-federal Mid-Columbia projects (Wells, Rocky Reach, Rock Island, Wanapum, and Priest Rapids).
- Maintained and ran a stand-alone copy of the Northwest Power Pool's hydroelectric regulation model. The primary purpose of this model was to support coordination of the northwest hydroelectric system as called for under the Pacific Northwest

Coordination Agreement. Puget's independent model runs were made to support short-term operational strategies as well as to provide input to the long-term production costing models uses for ratemaking purposes.

- Represented Puget in various regional forums and efforts, developing a strong understanding of the different issues and stakeholders. These regional forums and processes include:
  - Participation in regional planning called for under the US-Canadian Columbia River Treaty, including review and understanding of the Annual Operating Plan ("AOP"), the Detailed Operating Plan ("DOP") and the development of the determination of the downstream power benefits and the resulting Canadian Entitlement to one half of the energy and capacity determination.
  - Review of BPA's loads and resources planning process (the "White Book") and review of the related model results.
  - Negotiation of terms and conditions for a Puget-BPA Non-Treaty Storage Agreement which Puget ultimately declined to sign due to a negative outcome on a cost-benefit evaluation.
  - Participated on behalf of Puget in the BPA System Operations Review conducted in the late-1990s to evaluate the Pacific Northwest system operations and resulted in various records of decisions by the operating agencies in 1997.

**BONNEVILLE POWER ADMINISTRATION**  
Portland, Oregon

SUMMER 1988

*Engineering Intern*

Designed and programmed various aspects of the Accelerated California Market Estimator ("ACME") computer model, which simulated economic dispatch of the Southwest electric generating resources to forecast the electricity market through identification of the highest-cost marginal resources. ACME was a subroutine of the SAM model, which was run for various purposes, including value justification of investment in and construction of various BPA transmission assets.

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**EDUCATION**

**GONZAGA UNIVERSITY**, Spokane, Washington  
Bachelor of Science, Physics with a Mathematics Minor  
Magna Cum Laude



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**EXPERT TESTIMONY**

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**STATE OF IDAHO DISTRICT COURT - SEVENTH DISTRICT** 2018-19  
**FALL RIVER ELECTRIC COOPERATIVE AND FREMONT MADISON IRRIGATION**  
**DISTRICT VS. SUNRISE ENGINEERING, INC. ET. AL.**  
Provided expert analysis and written reports on behalf of defendant Sunrise Engineering regarding the power and financial impacts of alleged defects in the design and construction of the Chester hydro-electric project in Southern Idaho.

**MONTANA PUBLIC SERVICE COMMISSION** 2016-18  
**DOCKET NOS. D2016.4.33/D2017.8.65 - CREP WAIVER**  
Testified on behalf of NorthWestern Energy regarding their renewable procurement efforts.

**MONTANA PUBLIC SERVICE COMMISSION** 2015  
**DOCKET NO. D2015.3.27 - CREP WAIVER PETITION**  
Testified on behalf of NorthWestern Energy regarding their renewable procurement efforts.

**MONTANA PUBLIC SERVICE COMMISSION** 2014  
**DOCKET NO. D2013.10.77 - CREP WAIVER**  
Testified on behalf of NorthWestern Energy regarding their renewable procurement efforts.

**PUBLIC UTILITIES COMMISSION OF SOUTH DAKOTA** 2012  
**DOCKET NO. EL11-006 - COMPLAINT BY OAK TREE ENERGY LLC**  
Testified on behalf of NorthWestern Energy regarding the wholesale electricity price used as part of their determination of avoided cost rates for PURPA project agreements.

**LEWIS COUNTY SUPERIOR COURT OF WASHINGTON STATE** 2008  
**TRANSALTA CENTRALIA GENERATION LLC VS. SICKLESTEEL CRANES INC. ET. AL.**  
Testified on behalf of defendant Sicklesteel Cranes regarding the financial impact of an outage at the Centralia coal plant on Plaintiff Transalta Centralia Generation.

## **Laura McCarty**

[Laura.mccarty@energytrading.tech](mailto:Laura.mccarty@energytrading.tech)

206.890.2614

### **Energy Transition and Market Trading Leadership**

Working on the front lines of a fundamental transformation toward the decarbonized, distributed energy marketplace. 20+ years of experience in organized wholesale energy, capacity and flexibility markets; energy trading, risk management and utility operations.

Major focus at the intersection of distributed energy resources (DERs) aggregation, particularly Electric Vehicles (EVs) and the retail and wholesale markets including PPAs and vPPAs.

Ms. McCarty's experience includes two of the "Big 4" Management Consultancies – Andersen Consulting (now Accenture) and Deloitte Consulting.

#### **Energy Trading Technology, Inc – Founder and CEO**

Seattle, Washington

**1998 – Present**

Responsible for the roadmapping and implementations of energy-related software and technologies including selection methodologies, requirements gathering and analysis, implementation estimates, design and specification, development, project management and implementation at customer sites.

- Defining long-term business area software and technology roadmaps
- Defining business requirements around metrics, program objectives, contract management, and processing systems
- Project management, modeling, training and knowledge-base development for new energy-related processes and software implementations
- Development of custom operations procedures for new implementations
- Integration of new software and procedures with existing systems

#### **GridUnity, Inc**

New Jersey

**November 2023 – September 2024 – VP - Customer Success**

Responsible for the successful implementation of GridUnity's Interconnection Lifecycle Management (ILCM) Platform to utilities and ISO/RTO organizations. As VP of Customer Success I've been fortunate to have a crucial role in driving revenue growth and customer retention by being valued as a trusted and strategic partner to our customers and helping them exceed their interconnection and queue throughput goals.

Increased the GridUnity customer base by 75% during my tenure. Grew the Customer Success organization by 50%. I worked toward building a highly inclusive culture ensuring team members thrive and organizational objectives and key results are met.

**FlexCharging, Inc.**

Redmond, Washington

**March 2022 – November 2023 – Strategic Advisor**

**September 2019 – March 2022 – COO**

**March 2019 – September 2019 – Director of Operations**

Responsible for operationalizing FlexCharging’s strategies toward making Electric Vehicles (EVs) a valuable grid asset by bringing their load to the grid at the times of least expensive generation supply and/or lowest carbon supply. As COO, I transitioned company strategy into actionable goals, roadmaps and project timelines to ensure high performance and company growth. In addition, I helped to implement organization-wide goal setting, performance management, and operating planning.

**Drift Marketplace – Director of Power Operations**

Seattle, Washington

**April – December 2018**

Responsible for the overall strategy, implementation and tracking of programs and projects related to the integration of energy assets into the wholesale and bilateral power markets. This included developing project plans, resource plans, designs, risk identification, and risk mitigation strategies. It also included partnering with internal and external business and technology partners to increase productivity and opportunities for quick entry into power markets (NYISO and ERCOT) and bilateral energy agreements

**Local-E – Founder and CEO**

Seattle, Washington

**2016 - 2018**

Local-E’s mission was to increase the number of non-profit solar installations by enabling non-profit and low-mid-income solar owners to have access to green power payments from their local community members. Non-profits and low-mid-income residential solar face additional financial burdens as they are often ineligible for federal tax credits for the costs of a solar system. Local-E allowed these smaller systems to have access to renewable energy credit (RECs) payments – just like larger renewable generation systems (particularly large corporate wind generation).

**Altra Software, Inc. - Now FIS Global**

Kirkland, Washington

**Implementation Director – January 2001 - November 2001**

**Implementation Consultant – January 2000 - December 2000**

**Deloitte & Touche Consulting Group**

Chicago, Illinois and Seattle, Washington

**August '96 – August '98 – Senior Manager – Energy Practice**

**August '94 - August '96 – Manager – Commodities Trading Practice**

**Bank of Montreal/ Harris Bank**

Chicago, Illinois

**September 1991 – August 1994 – Director of Payment Processing/EDI**

**Andersen Consulting (Now Accenture)**

Chicago, Illinois

**January 1987 – September 1991 – Senior Consultant**

**Education**

- B.S. – Mathematics and Computer Science - University of Illinois