

EXH. BTC-2  
DOCKETS NOS. UE-240004/UG-240005  
2024 PSE GENERAL RATE CASE  
WITNESS: BRADLEY CEBULKO

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

DOCKET NOS. UE-240004 and UG-240005  
*(Consolidated)*

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**EXHIBIT BTC-2 (NONCONFIDENTIAL) TO THE  
RESPONSE TESTIMONY OF**

**BRADLEY CEBULKO**

**ON BEHALF OF  
JOINT ENVIRONMENTAL ADVOCATES**

**August 6, 2024**

## Brad Cebulko

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Partner... \* (317) 519-3165 \* bcebulko@currentenergy.group

### Education

Master of Public Administration  
University of Washington - Seattle, WA (2012)

Bachelor of Arts Political Science  
Colorado State University – Fort Collins, CO (2006)

### Work Experience

Founding Partner, Current Energy Group, (May 2024 – Present)

- Works with consumer advocates and public interest organizations on gas and electric regulatory issues before state public utility commissions.

Founder, CEB Energy Consulting, (March 2024 – May 2024)

- Worked with consumer advocates and public interest organizations on gas and electric regulatory issues before state public utility commissions.

Senior Manager, Strategen Consulting, (2021 – March 2024)

- Led Strategen’s gas transition practice, which included regulatory and legislative strategy, prudence reviews, and gas infrastructure planning.
- Worked with state regulatory commissions, consumer advocates, non-profits, and other clients to advance the public interest in regulatory decision-making.
- Developed testimony, comments, reports, and analysis on a subject matter including gas utility decarbonization strategies, performance-based regulation, electric and gas resource planning, fuel costs, energy efficiency, and low-income ratepayer issues.

Senior Policy Advisor for Energy Strategy, Washington Utilities and Transportation Commission (2016 – 2021)

- Advised the Commissioners on electric and gas utility regulation and legislation.

- Led major Commission policy initiatives through Commission orders, policy statements, and rulemakings, including developing rules for the Clean Energy Transformation Act.
- Chair of the Staff Subcommittee on International Relations at NARUC.

Regulatory Analyst, Washington Utilities and Transportation Commission (2013 – 2016)

- Testified before the commission in suspended utility filings and general rate case proceedings.
- Led Commission Staff’s review of natural gas integrated resource plans and energy efficiency filings.



DTE Gas Company 2024 Rate Case (DKT: U-21291) on Behalf of The Ecology Center, The Environmental Law & Policy Center, Union of Concerned Scientists, and Vote Solar Direct.and.Rebuttal.Testimony

Filed testimony examining the Company long-term capital investment strategy, proposal to end demand response pilots, and the benefits of customer mapping to ensure equitable gas service.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Northwest Natural Gas Company 2024 General Rate Case (DKT: UG 490) on Behalf of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club Direct.Testimony

Filed testimony recommending the Commission reject the Company’s proposed line extension allowance modifications, disallow imprudent expenditures related to the line extension program, and reject the Company’s proposal to increase the customer charge for new customers by more than 250 percent.

[Case Details](#) | [Direct Testimony](#)

Southern Connecticut Natural Gas Company and Connecticut Natural Gas Company 2024 Rate Case (DKT: 23-11-02) on Behalf of Sierra Club and Conservation Law Foundation

Direct.and.Rebuttal.Testimony

Filed testimony examining the Companies capital investments plans and decarbonization programs.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Public Service Company of Colorado 2024-2028 Clean Heat Plan (DKT: 23A-0392EG) on Behalf Western Resource Advocates and Rewiring America (2024)

Testimony.and.Report

Filed a report and testimony examining the review the utility's capital investment plan, assessed the benefits of zonal electrification, assessed the capital and operation & maintenance (O&M) costs for blending hydrogen into the distribution system, and assessed the reasonableness of the Company's synthetic natural gas (SNG) assumptions.

PacifiCorp 2023 Washington General Rate Case (DKT: UE-230172) on Behalf of The Energy Project (2023)

Response.Testimony

Filed testimony on the Company's proposed electric performance metrics. Proposed a more comprehensive portfolio of metrics that measures the utility's performance to provide affordable, clean, equitable, and reliable power.

[Case Details](#) | [Direct Testimony](#)

Northern Illinois Gas Company Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service (DKT: 23-0066) on Behalf of Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Illinois State Public Interest Research Group, Inc (2023)

Direct.and.Rebuttal.Testimony

Filed testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and residential rate design.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

The Peoples Gas Light and Coke Company 2023 Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service (DKT: 23-0068 and 23-0069) on Behalf of Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Illinois State Public Interest Research Group, Inc. (2023)

Direct.and.Rebuttal.testimony

Filed testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and residential rate design.

[Case Details](#) | [Direct Testimony](#) | [Rebuttal Testimony](#)

Avista 2023 Oregon Gas General Rate Case (DKT: UG-461) on Behalf of Sierra Club and Climate Solutions (2023)

Direct.Testimony

Filed testimony on Avista's compliance plan for meeting Climate Protection Program compliance, non- pipeline alternatives, and line extension policy. Through settlement, Avista agreed to initiate non- pipeline alternative analysis in its integrated resource plan, phase out its line extension allowance policy by 2027, and delay seeking recovery of Climate Investment Cost Recovery.

[Case Details](#) | [Direct Testimony](#) | [Final Order](#)

Puget Sound Energy 2022 Electric and Gas General Rate Case (DKT: UE-220066, UG-220067, and UG- 210918) On Behalf of The Energy Project (2022)

Response.Testimony

Filed testimony on Gas and Electric Performance Metrics and Electric Time-of-Use Rate Pilot. Through settlement, PSE agreed to modify its Time of Use pilot and track performance metrics that closely aligned with The Energy Project's proposals

[Case Details](#) | [Response Testimony](#) | [Settlement Testimony](#)

Liberty Utilities RNG Program (DKT 22-32) On Behalf of Sierra Club (2022)

Direct.Testimony

Filed testimony recommending the Massachusetts Department of Public Utilities reject Liberty's proposed Voluntary Renewable Natural Gas Program because it was costly and the Company's proposal would have double counted the environmental attributes of the project. The Department of Public Utilities largely relied on Sierra Club's testimony when it reject the Company's proposed RNG program.

[Case Details](#) | [Direct](#)

PacifiCorp 2022 General Rate Case (DKT UE 399) On Behalf of Vitesse LLC (2022)

Direct.and.Rebuttal.Testimony

Filed testimony on behalf of Vitesse LLC, a wholly owned subsidiary of Meta, on the proposed design of PacifiCorp's voluntary green tariff program for large customers. The Oregon PUC approved a multi-party settlement that made several revisions to the program based on my testimony.

[Case Details](#) | [Direct](#) | [Rebuttal](#)

Consumers Energy 2022 Natural Gas General Rate Case (DKT U-21148) On Behalf of Michigan Environmental Council, NRDC, and Sierra Club (2022)

Direct.Testimony

Direct testimony on Company's proposal build and operate a RNG facility, and the Company's line extension allowance policy. Through settlement, the Company agreed not to seek recovery of the RNG facility and to update the utility's line extension allowance assumptions.

[Case Details](#) | [Direct](#)

Xcel Energy, Minnesota Energy Resources Corp, CenterPoint Energy (DKT: 21-138) On Behalf of Minnesota CUB (2021 – 2022)

Direct.and.Rebuttal.Testimony

Filed direct and rebuttal testimony on the prudence of the three gas utilities extraordinary gas costs during Winter Storm Uri in 2021. The Minnesota PUC relied, in part, on Strategen's testimony to find nearly \$60 million in imprudent costs for the gas utilities. The Commission also accepted Strategen's recommendation to initiate gas utility long-term planning.

[Case Details](#) | [Direct](#)

Puget Sound Energy Proposed Leasing Program (DKT: UE-151871/UG-151872) On Behalf of Washington UTC Staff (2016)

Filed direct testimony opposing the Company's proposed end-use appliance leasing program for not being in the public interest. The Commission agreed that the program was poorly structured and was unlikely to benefit participants and non-participants

[Case Details](#) | [Direct](#)

Avista 2015 General Rate Case (Dockets UE-150204/UG-150205) On Behalf of Washington UTC Staff (2015)

General Rate Case

[Case Details](#) | [Direct](#)

Avista 2014 General Rate Case (Dockets UE-140188/UG-140189) On Behalf of Washington UTC Staff (2014)

General.Rate.Case.

[Case Details](#) | [Direct](#)



Illinois Future of Gas Proceeding on Behalf of NRDC  
Technical.and.Policy.Support

Providing technical and policy assistance through written comments and participation in workshops to the client over the course of Illinois Commerce Commission's Future of Gas investigation

Puget Sound Energy 2025 Gas and Electric Integrated Resource Plans on Behalf of Climate Solutions, Renewable Northwest.  
Technical.and.Policy.Support

Providing technical and policy assistance to the clients during their participation in the PSE IRP stakeholder work sessions.

Tennessee Valley Authority 2024 Integrated Resource Plan on Behalf of GridLab and The Nature Conservancy (2024)  
Technical.and.Policy.Support

Providing technical and policy assistance to The Nature Conservancy during its participation in the TVA IRP stakeholder work sessions.

Nevada Public Utilities Commission Natural Gas Utility Integrated Resource Planning Rulemaking on Behalf of Western Resource Advocates (2024)  
Technical.and.Policy.Support

Providing technical and policy assistance to Western Resource Advocates in its participation in the PUCN's rulemaking. Drafted proposed comprehensive rules and supporting arguments.

A Regulator's Blueprint for 21st Century Gas Utility Planning, A Report for Advanced Energy United (2023)  
[Report](#)

Led the development of a report that provided a blueprint for state public utility commissions that are interested in developing gas utility planning requirements to improve transparency into gas utility resource and capital investment plans.

New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation Initial Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2024)

## A.Review.of.the.Initial.Long\_Term.Plan

Developed a report that analyzed the Companies' alternative fuel assumptions, electrification costs, capital forecast, technological assumptions for electrification technologies, benefit-cost analysis, and implementation of non-pipeline alternatives ("NPAs").

Comments on CenterPoint Energy's Natural Gas Innovation Act (NGIA) Pilots in Minnesota on Behalf of Fresh Energy (2023)  
[Comments](#)

Provided technical support and comments to client on components of CenterPoint's filing including its proposed hydrogen blending facility, an RFP for renewable natural gas, and residential and commercial gas heat pump pilots.

Minnesota Public Utilities Commission Investigation into Gas Utility Resource Planning on Behalf of the Citizen's Utility Board of Minnesota (2023)  
[Comments](#)

Providing technical support to client on the Minnesota Commission's consideration of natural gas utility long-term planning.

Nonpipeline Alternative Analysis Framework for the Colorado Public Utilities Commission on Behalf of Lawrence Berkeley National Laboratory (2023)  
[Part.7.NPon\\_Pipeline.Alternative.to.Natural.Gas.Utility.Infrastructure.Report](#)  
[Part.8.NPon\\_Pipeline.Alternatives;A.Regulatory.Framework.and.a.Case.Study.of.Colorado](#)

Through a collaboration with Lawrence Berkeley National Laboratory and the Colorado Public Utilities Commission, I led the development of two reports that first examined the existing regulatory approaches for non-pipeline alternatives, and then proposed a regulatory framework.

Comments to the Oregon Public Utilities Commission on Northwest Natural Gas Company's 2022 Integrated Resource Plan on Behalf of Coalition of Climate Advocates (2023)  
[Natural.Gas.IRP](#)

Provided technical support to a coalition of climate-focused organizations, and frontline community organizations, on the gas utility's plans for meeting future customer demand while complying with Oregon and Washington emissions reductions requirements.

Consolidated Edison and Orange & Rockland's 2023 Initial Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2023)



### [A.Review.of.the.Initial.Long\\_Term.Plan](#)

Provided a review of the gas utilities' initial Long-Term Plan with a focus on electrification assumptions, alignment of capital investment spending and load forecast, nonpipeline alternative analysis, and reasonableness of scenarios for meeting emissions reduction requirements.

National Fuel Gas Distribution Corporation 2023 Long-Term Gas System Plan on Behalf of Sierra Club and Earthjustice (2023)

### [Comments.on.Electrification.Assumptions](#)

Provided comments on NFG's technological and cost assumptions for various electrification technologies, cost basis for the crossover temperature for heat pumps, and electrification adoption curves. Strategen then proposed several recommendations for adjustments that NFG could make in this proceeding, or future LTPs, to better represent the technical capacity and emission reduction potential of electrified heating systems.

Consumers Energy Gas Bill Impact Analysis: A Case Study of the Effects of Planned Capital Expenditures and Electrification Trends on Behalf of Advanced Energy United (2023)

### [White.Paper](#)

Quantified the impact of gas utility capital improvement projects on customer rates Consumers Energy gas in Michigan. The paper found that Michigan residential customers with Consumers Energy can expect to see their gas bills steadily increase over the next decade – up to 49% over 2021 levels – due to projected utility capital expenditures and electrification trends.

White Paper on the Relationship of Gas and Electricity Prices in New England on Behalf of Sierra Club (2023)

### [White.Paper](#)

Co-authored a white paper that provides background and context on the implications of recent electricity price spikes in New England and the relationship between natural gas prices and electricity prices.

Nevada Gas Utility Decarbonization Planning 2022 Legislative Proposals on Behalf of GridLab and SWEEP (2023)

### [Technical.and.Policy.Advice](#)

Providing a coalition of climate-focused advocates with technical and policy guidance on legislation for gas planning requirements

Presentations to Western States on Planning for Decarbonizing Gas Utilities on Behalf of Advanced Energy United (2022-2023)  
Presentations

Led Strategen's collaboration with AEU to develop a series of presentations for Western State Public Utility Commission commissioners on how to plan for the decarbonization transition of natural gas utilities.

Designing Building Electrification Incentives for Washington State on Behalf of Climate Solutions (2022)  
Technical.and.Policy.Advice

Developed funding scenarios that would allow Washington State to meet building decarbonization targets. Solutions focused on rebates for high-efficiency electric appliance retrofits and community- centered weatherization programs.

Washington Utilities and Transportation Commission Proceeding to Develop a Policy Statement Addressing Alternatives to Traditional Cost of Service Rate Making, (DKT: U-210590) On Behalf of The Energy Project (2022)

Policy.Statement

Supported client, the low-income advocate in Washington, on comments on regulatory goals, outcomes, and performance metrics.

[Case Details](#) | [Comments](#)

Comments to the Minnesota Public Utilities Commission on Natural Gas Planning (DKT: 21-135) On Behalf of Citizens Utility Board of Minnesota (2022)

[Comments](#)

Provided technical and policy guidance to the Minnesota Commission on how gas planning, operational changes, and risk sharing can help protect customers from future natural gas price spikes like that occurred during February 2021.

Puget Sound Energy 2023 Natural Gas Integrated Resource Plan on Behalf of Climate Solutions (2023)

Natural.Gas.IRP

Supported client's review of the Company's development of the inputs and assumptions used in the IRP.

Michigan Public Service Commission, Renewable Natural Gas Study Workgroup (DKT: U-21170) On Behalf of Michigan Environmental Council, NRDC, and Sierra Club (2022)

Workgroup

Supported clients' review of the development of the study including submitting comments to the PSC.

Kentucky Utilities and Louisville Gas and Electric Company General Rate Case (DKT: 2020-00350) On Behalf of the Kentucky Public Service Commission (2021-2022)

General.Rate.Case

Supported the Kentucky PSC evaluate testimonies on PURPA rates and set new rates for the utilities.

[Case Details](#) | [Final Order](#)

Minnesota Power 2021 Integrated Resource Plan (DKT: 21-33) On Behalf of Citizen Utility Board of Minnesota (2022)

Electric.IRP

Supported client's review of the Company's IRP.

[Case Details](#) | [Comments](#)