

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-230172
(Consolidated)

In the Matter of

ALLIANCE OF WESTERN ENERGY
CONSUMERS'

Petition for Order Approving Deferral of
Increased Fly Ash Revenues

DOCKET UE-210852
(Consolidated)

RESPONSE TESTIMONY OF

BRADLEY T. CEBULKO

ON BEHALF OF THE ENERGY PROJECT

EXHIBIT BTC-2

Qualifications



Brad Cebulko

Senior Manager



Brad leads Strategen's gas utility transition practice. He also provides expert testimony on numerous utility regulation topics including gas utility decarbonization strategy, electric and gas long term planning, fuel costs, energy efficiency and conservation programs, low-income ratepayer issues, and greenhouse gas regulation policy. He has prior experience with the Washington Utilities and Transportation Commission developing policy initiatives through Commission orders, policy statements, and rulemakings.

Contact



Location

Vashon,
Washington



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Education

MPA

Environmental Policy

University of Washington
2012

BA

Political Science

Colorado State University
2006

STRATEGEN.COM

Work Experience

Senior Manager

Strategen / Berkeley, CA / 2021 – Present

- + Leads Strategen's gas transition practice, which includes regulatory and legislative strategy, prudence reviews, and infrastructure planning.
- + Works with state regulatory commissions, consumer advocates, non-profits, and other clients to advance the public interest in regulatory decision-making.
- + Leverages subject matter expertise in gas decarbonization, utility 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 / Olympia, WA / 2016 – 2021

- + Advised the Commissioners on utility regulation and integrated resource planning.
- + Led major Commission policy initiatives through Commission orders, policy statements, and rulemakings, including developing rules for the Clean Energy Transformation Act.
- + Served on the WA Department of Commerce's Electrification of Transportation Program Advisory Committee and Chair of the Staff Subcommittee on International Relations at NARUC.

Regulatory Analyst

Washington Utilities and Transportation Commission / Olympia, WA / 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.



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Expert 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
[Direct and Rebuttal Testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and 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.

[Direct testimony on capital expenditures, line extension allowances, non-pipeline alternatives, gas system planning, performance metrics, and rate design.](#)

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

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

[Response Testimony on Gas and Electric Performance Metrics and Electric Time-of-Use Rate Pilot.](#)

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

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

[Voluntary Renewable Natural Gas Program Testimony](#)

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

Avista 2022 General Rate Case (DKT UE-220053 & UG-220054) On Behalf of the Energy Project

[Settlement Testimony on Performance Metrics](#)

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

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

[Voluntary Renewable Energy Tariff Testimony](#)

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

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

[Natural Gas Prudence Testimony](#)

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

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

[Natural Gas Prudence Testimony](#)

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



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Expert Testimony (continued)

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

[Utility Service Offerings](#)

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

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

[General Rate Case](#)

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

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

[General Rate Case](#)

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

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Selection of Relevant Experience

Nonpipeline Alternative Analysis Framework for the Colorado Public Utilities Commission on Behalf of Lawrence Berkeley National Laboratory

Through a collaboration with Lawrence Berkeley National Laboratory, Strategen is providing technical assistance to the Colorado Public Utilities Commission as it considers a framework for NPAs as part of the state's new Gas Infrastructure Planning requirements.

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

Gas Rate Impact Analysis on Behalf of Advanced Energy Economy (2023) [White Paper](#)

Quantified the impact of gas utility capital improvement projects on customer rates for two gas utilities, one in Michigan and the other in Nevada. The White Paper will consider the cost impacts over a range of load growth scenarios, including one that assumes a customer count decrease.

White Paper on the Implications of the Gas Utility Decarbonization Transition: An Analysis of Southwest Gas Company on Behalf of SWEEP and GridLab (2022) [White Paper](#)

Developed a white paper that examines the cost-effectiveness and feasibility of electrification, energy efficiency, and alternative fuels as decarbonization solutions with a focus on Southwest Gas Company in Arizona. The White Paper will also examine how to mitigate negative impacts to low-income customers if a gas utility is losing customers due to electrification.



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Selection of Relevant Experience (continued)

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

[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 Economy (2022-2023)

[Presentations](#)

Leading Strategen's collaboration with AEE 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

[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.



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Selection of Relevant Experience (continued)

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

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

Puget Sound Energy 2023 Electric Integrated Resource Plan Update on Behalf of Climate Solutions
[Electric 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
[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
[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
[Electric IRP](#)

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

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