Nancy L. Kelly

9463 N. Swallow Road, Pocatello, Idaho 83201 (208) 234-0636 nancy.kelly@westernresources.org

EXPERIENCE

Western Resource Advocates (WRA), Boulder Colorado

Senior Policy Advisor (August 1, 2008—present)

- Provide regulatory support to WRA in the states of Utah, Nevada, and Colorado; participate in regional transmission forums.
- Serve as an expert witness for WRA in examining PacifiCorp's investments in environmental retrofits for its coal-fired facilities in Rocky Mountain Power's 2011 General Rate Case;
- Participate in the dockets in Nevada and Colorado investigating an Energy Imbalance Market:
- Participate in the docket in Colorado establishing transmission planning rules for the state of Colorado;
- Serve as expert witness for WRA in evaluating Rocky Mountain Power's Energy Cost Adjustment Mechanism Application;
- Serve as expert witness for Nevadans for Clean Affordable Reliable Energy (NCARE) in its opposition to LS Power's application for an environmental permit to construct a 1600 MW coal facility in White Pine County, Nevada;
- Serve as expert witness for WRA in evaluating Rocky Mountain Power's application for a Certificate of Convenience and Necessity to construct the Populus to Terminal 500 kV transmission line across southeast Idaho and northern Utah;
- Participate in the public input process leading to the submission of PacifiCorp's 2011 and 2009 Integrated Resource Plans and Plan Updates for the six states it serves; assist in providing comments to the Public Service Commission of Utah.
- Participate in Public Service Company of New Mexico's (PNM) first integrated resource planning process and evaluate its draft IRP report;

Western Electricity Coordinating Council (WECC)

- Serve as a member of the WECC Board of Directors—April 2002 to present;
- Serve on the WECC Reliability Policy Issues Committee (RPIC) and in other WECC forums—April 2003 to June 2011

Office of Consumer Services, Department of Commerce, Salt Lake City, Utah

Consultant and Utility Economist (March 1998 to June 2008)

- Represent the Committee of Consumer Services as a designated member of the Committee on Regional Electric Power Cooperation (CREPC);
- Serve as project manager and policy analyst in evaluating PacifiCorp's Integrated Resource Planning (IRP); provide expert testimony in PacifiCorp's Request for Proposal (RFP) process;
- Serve as project manager, policy analyst, advocate, and witness in addressing PacifiCorp's multijurisdictional allocation issues;
- Serve as project manager and policy analyst for the Committee's response to PacifiCorp's application for a Power Cost Adjustment Mechanism (PCAM);
- Serve as project manager, policy analyst, and policy witness for the Committee's response to PacifiCorp's application to sell its Centralia Generating Plant and Mine.
- Represent the Committee of Consumer Services and Utah small customers in the many regional processes relating to the formation of regional transmission organizations, transmission expansion planning, and transmission project planning;
- Advise the Committee regarding Federal Energy Regulatory Commission (FERC) and other federal activity, restructuring in other states, and implications for Utah customers;
- Advise the Committee regarding the impacts of electrical deregulation on Utah's residential and small business customers. Participate in legislative and Commission activity regarding electrical restructuring.

Center for Business Research and Services, Idaho State University, Pocatello, Idaho

Staff Economist (1992 – 1997)

- Authored/edited *Idaho Indicators* a quarterly publication tracking local indices;
- Conducted economic impact analyses and prepared reports;
- Worked with other agencies to conduct studies and prepare reports;
- Prepared census reports.

Regional Services, Inc., Challis, Idaho.

Research Associate (1990 – 1992)

• Analytical support pertaining to western water and anadromous fish issues.

College of Business, Idaho State University, Pocatello, Idaho.

Instructor (1994-1995)

- Advanced Business Statistics
- Managerial Economics

Department of Economics, Idaho State University, Pocatello, Idaho

Visiting Instructor (1988-1991, 1986)

- Econometrics
- International Economics
- Labor Economics
- Principles of Microeconomics
- Principles of Macroeconomics
- Economics Issues

Department of Economics, Westminster College, Salt Lake City: *Instructor* (1988)

Department of Economics, University of Utah, Salt Lake City: *Instructor*, (1985-1988)

Department of Economics, University of Utah, Salt Lake City: *Teaching Fellow*, (1983-1985)

EXPERT WITNESS

- Western Resource Advocates, Utah Docket No. 10-035-124, In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations. (Prefiled testimony: May 26, 2011, July 19, 2011.)
- Western Resource Advocates, Utah Docket No. 09-035-15, *In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism*. (Prefiled testimony: November 16, 2009; January 5, 2010; June 16, 2010; August 4, 2010; August 10, 2010; September 15, 2010, October 13, 2010. Hearing appearances: January 13, 2010; August 17, 2010; November 3, 2010. Brief: December 16, 2010.)
- Western Resource Advocates, Nevada Docket No. 06-02032, Application of White Pine Energy Associates, LLC for authority under the provisions of the Utility Environmental Protection Act for a permit to construct electrical generation facilities and ancillary facilities to be known as the White Energy Station with a capacity of up to 1600 MW as well as one 500 kV substation and interconnection facilities, one 500 kV line traversing 35 miles, and two parallel 500 kV transmission spur lines traversing between 2.5 and 6 miles to be located in White Pine County, Nevada. (February 20, 2009)
- Western Resource Advocates, Utah Docket No. 08-035-42: In the Matter of the Application of Rocky Mountain Power for a Certificate of Convenience and Necessity Authorizing Construction of the Populus to Terminal 345 kV Transmission Line Project. (August 26, 2008)
- Committee of Consumer Services. Docket No 05-035-47: *In the Matter of the Application of PacifiCorp for Approval of a 2009 Request for Proposals for Flexible Resources*. (November 3, 2006)
- Committee of Consumer Services. Docket No. 02-035-04: *In the Matter of the Application of PacifiCorp for an Investigation into Interjurisdictional Issues*. (July 21, 2004)
- Committee of Consumer Services. Docket No. 99-2035-03: In the Matter of the Application for an Order Approving the Sale of its Interest in (1) the Centralia Steam Electric Generating Plant, (2) the Ratebased Portion of the Centralia Coal Mine, and (3) Related Facilities; For a Determination of the amount And the Proper Ratemaking Treatment of the Gain Associated With the Sale; and for an EWG Determination. (January 20, 2000)

COMMENTS¹

- Filed Comments of Western Resource Advocates to the Public Utilities Commission of the State of Colorado: Docket No. 11M-998E: In the Matter of Commission Activities Related to a Regional Energy Imbalance Market that May Include Colorado Utilities. (March 23, 2012)
- Filed Comments of Western Resource Advocates, Before the Public Utilities Commission of Nevada: Docket No. 11-04025: Investigation Regarding the Creation of an Energy Imbalance Market. (September 30, 2011)
- Filed Comments of Western Resource Advocates to the Public Service Commission of Utah: Docket No. 11-2035-01: In the Matter of the Acknowledgment of PacifiCorp Integrated Resource Plan. (September 7, 2011; June 8, 2012)
- Filed Comments of Western Resource Advocates to the Public Utilities Commission of the State of Colorado: Docket No. 10R-526E: In the Matter of the Proposed Rules Related to Electric Transmission Facilities Planning, 4 Code of Colorado Regulations 723-3. (October 15, 2010; December 10, 2010; February 10, 2011)
- Filed Comments of Western Resource Advocates to the Public Service Commission of Utah: Docket No. 09-2035-01: In the Matter of the Acknowledgment of PacifiCorp Integrated Resource Plan. (June 18, 2009; June 15, 2010)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Docket No 07-2035-01: In the Matter of the Acknowledgment of PacifiCorp Integrated Resource Plan 2007. (August 31, 2007)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: *In the Matter of the Application of PacifiCorp for Approval of a 2009 (2012)*Request for Proposals for Flexible Resources; Docket No 05-035-47. (October 13, 2006)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Committee of Consumer Services' Comments Regarding PacifiCorp's Application for Approval of a 2009 Request for Proposals for Flexible Resources in Docket No. 05-035-47. (August 23, 2006)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Comments of the Committee of Consumer Services regarding PacifiCorp's Integrated Resource Plan 2004 Update; Docket No. 05-2035-01. (May 5, 2006)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Recommendations of the Committee of Consumer Services regarding the Matter of Acknowledgement of PacifiCorp's Integrated Resource Plan 2004; Docket No. 05-2035-01. (April 25, 2005)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Recommendations of the Committee of Consumer Services regarding the Matter of Acknowledgement of PacifiCorp's Integrated Resource Plan 2003; Docket No. 03-2035-01. (March 31, 2003)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: *PacifiCorp's Integrated Resource Plan, RAMPP-6, Docket No. 98-2035-05.* (December 10, 2001)

¹ Prepared or assisted in preparing

- Comments and Suggestions of the Committee of Consumer Services on the Draft Report of the Electrical Deregulation and Customer Choice Task Force to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. (November 1998)
- Summary Comments of the Committee of Consumer Service on Market Power to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. (September 1998)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Comments of the Committee of Consumer Services on Market Power to the Utah Public Service Commission, Docket No. 96-999-01. (August 28, 1998)
- Summary Comments of the Committee of Consumer Services on Customer Protection to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. (June 1998)
- Filed Comments of the Committee of Consumer Services to the Public Service Commission of Utah: Comments of the Committee of Consumer Services on Customer Protection to the Utah Public Service Commission, Docket No. 96-999-01. (May 20, 1998)
- Summary Comments of the Committee of Consumer Services on Unbundling to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. (May 1998)
- Filed Comments of the Committee of Consumer Services: Comments of the Committee of Consumer Services on Unbundling to the Utah Public Service Commission, Docket No. 96-999-01. (April 30, 1998)

TECHNICAL REPORTS AND PUBLICATIONS

- Ball, Roger and Nancy L. Kelly (May 2001) Is Deregulation of the Electrical Industry Good for Utah? *Utah Business: The Magazine for Decision Makers*.
- Kelly, Nancy L. (September 1997). *Idaho National Engineering and Environmental Laboratory Impacts*. Prepared for the US Department of Energy.
- Kelly, Nancy L. (August 1997). Fort Hall Head Start Community Needs Assessment. Prepared for the Fort Hall Head Start Program.
- Kelly, Nancy L. (September, 1996). *INEL Impacts: Influence of the Idaho National Engineering Laboratory on the Economic and Community Life of Southeastern Idaho*. Prepared for the US Department of Energy.
- Kelly, Nancy L. and Jeff Bartlome' (April 25, 1994). *A Comparative Cost Study of Idaho's Personal Care Services (PCS) Program with Alternative Facility Settings*. Prepared for the Idaho Department of Health and Welfare.
- Kelly, Nancy L. and Paul R. Zelus (Spring 1993). Economic Impact of the Construction and Operation of a New Waste Management Treatment Plant on the Southeast Idaho Economy. Prepared for Westinghouse.
- Kelly, Nancy L., with Paul R. Zelus (1992-1997). *Idaho Indicators*, College of Business, Idaho State University, quarterly publication.
- Kelly Nancy L. (December 2, 1991). *An Analysis of Indian Health Policy Activities*. Department of Economics, University of Utah. (Unpublished manuscript).

PRESENTATIONS

- Kelly, Nancy L. *Implications of the WECC Power Supply Assessment*. Presented to the Utah Committee of Consumer Services. January 10, 2008. Salt Lake City, Utah.
- Kelly, Nancy L. *Resource Planning, Acquisition, and Cost Allocation: The IRP, RFP, MSP Nexus.* Presented to the Utah Committee of Consumer Services. April 11, 2007. Salt Lake City, Utah.
- Kelly, Nancy L. *Electrical Restructuring: Issues of Market Power*. Presented to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. September 25, 1998. Salt Lake City, Utah.
- Kelly, Nancy L. *Electrical Restructuring and Issues of Customer Protection: Aggregation, and the Obligation to Serve and Connect.* Presented to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. August 20, 1998. Salt Lake City, Utah.
- Kelly, Nancy L. *Electrical Restructuring: Issues of Unbundling*. Presented to the Electrical Deregulation and Customer Choice Task Force, Legislature of the State of Utah. June 18, 1998. Salt Lake City, Utah.

EDUCATION

- ABD University of Utah, Department of Economics
- B.S. Economics, Idaho State University, 1983