

Docket No.: R.13-09-011
Exhibit No.: _____
Date: May 6, 2014
Witness: Jeremy Waen

**TESTIMONY OF MARIN CLEAN ENERGY ON
COST RECOVERY AND COMPETITIVE NEUTRALITY
ISSUES IDENTIFIED IN PHASE 2 AND 3
OF THE DEMAND RESPONSE OIR**

**ORDER INSTITUTING RULEMAKING TO ENCHANCE
THE ROLE OF DEMAND RESPONSE IN MEETING THE
STATE'S RESOURCE PLANNING NEEDS AND
OPERATIONAL REQUIREMENTS.**

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1 **Testimony of Marin Clean Energy on**
2 **Cost Recovery and Competitive Neutrality**
3 **Issues Identified in Phase 2 and 3**
4 **of the Demand Response OIR**

5 **I. Introduction**

6 Marin Clean Energy (“MCE”)¹ is a Community Choice Aggregator (“CCA”) that has
7 been serving customers within the Pacific Gas and Electric Company (“PG&E”) service territory
8 since May 7, 2010. MCE is the first operational CCA in California and to date has been the
9 primary voice for CCA-specific matters at the California Public Utilities Commission (“CPUC”).
10 Sonoma Clean Power (“SCP”), California’s second operational CCA, has begun offering its
11 services to customers in May 1, 2014. MCE currently provides electric service to approximately
12 125,000 retail customers throughout Marin County and the City of Richmond. Currently the
13 cities of Albany, El Cerrito, and San Pablo, as well as the County of Napa, are formally
14 exploring joining MCE’s service territory.

15 MCE was launched to achieve ambitious greenhouse gas (“GHG”) reduction goals set by
16 its member communities. MCE offers three electricity products to its customers: i) a 50%
17 renewable – low GHG – “default” product called “Light Green,” ii) a 100% renewable – GHG-
18 free – “opt-up” product called “Deep Green,” and iii) a 100% new local solar electricity product
19 called “Sol Shares.” MCE also offers competitive Net Energy Metering (“NEM”) tariffs, a Feed-
20 in-Tariff (“FiT”) for local renewable development, and Energy Efficiency (“EE”) programs. If a
21 customer wishes to receive PG&E generation service, that customer can opt out of the MCE
22 program at any time. While MCE’s customers receive generation service from the CCA
23 program, they continue to receive transmission, distribution, billing and other services from the
24 Pacific Gas and Electric Company (“PG&E”).

¹ Formerly known within these proceedings as the Marin Energy Authority (“MEA”).

1 **II. Background**

2 Currently MCE customers only have access to demand response (“DR”) programs
3 offered to them by the resident Investor Owned Utility (“IOU”). MCE aspires to offer both
4 supply-side and load modifying DR programs to its customers as soon as is technically feasible,
5 in spite of the many challenges that currently obstruct CCA administered DR programs. These
6 challenges include: i) the anti-competitive manner in which IOU-run DR program funds are
7 collected through delivery rates and not equally available to unbundled customers, ii) the lack of
8 access that CCAs have to timely customer usage data via the Advanced Metering Infrastructure
9 (“AMI”) platform, and iii) the anti-competitive impacts of the incentives used to drive
10 participation in IOU-run DR. All of these issues are explained in detail within MCE’s
11 involvement in Phase 1 of this proceeding.²

12 MCE’s continual involvement in the instant proceeding has been: i) to highlight the ways
13 that the current DR market structure stifles competition and participation of non-IOU Load-
14 Serving Entities (“LSEs”), especially in CCA context, ii) to identify changes that must occur to
15 increase the diversity and number of DR program offerings to California ratepayers by
16 facilitating CCA-run DR, and iii) to recommend policy frameworks that the CPUC should
17 embrace to enable diverse DR program offerings by CCAs and other non-IOU LSEs. MCE
18 acknowledges that while the recent Assigned Commissioner and Administrative Law Judge
19 Ruling issued on April 2, 2014 provides rather prescriptive and lengthy guidance for the
20 structure of parties testimony, MCE elects to provide more succinct testimony focused on CCA-
21 specific issues within the broader contexts of Phases 2 and 3 of this proceeding to facilitate
22 review by the Commission and other parties.

² See Comments of Marin Clean Energy on Demand Response Pilot Program Proposals During the 2015-2016 Bridge Funding Period, March 3, 2014.

1 **III. Phase 2 Remaining Issues and Questions**

2 **A. Cost Recovery**

- 3 • *Provide a summary of each of the Utilities' current demand response program*
4 *cost recovery and provide citations for the decisions authorizing this recovery*
5 *method.*

6 Because MCE began serving customers in May 2010 and has limited internal resources to
7 devote to regulatory matters, MCE's involvement in past Commission-led proceedings on DR
8 has been limited. It is the understanding of MCE that the Commission last considered addressing
9 cost recovery matters for IOU-run DR programs in the consolidated Application where all three
10 IOU's DR activities and budgets were considered for the 2012 to 2014 DR program cycle. The
11 Decision that resulted from this proceeding, ("D.") 12-04-045, stated the timing for "changing
12 the current cost recovery and rate design process for DR is not ripe" determined that "additional
13 data and fact finding" would be necessary to establish proper cost recovery methodology for DR
14 programs.³ As a result the IOU-run DR programs would continue to be funded through
15 collections from all ratepayer's delivery rates. This Decision goes on to recommend that this
16 issue be taken up in "R.07-01-041 or its successor."⁴ R.07-01-041, the last Order Instituted
17 Rulemaking considering DR-related matters before the Commission, did not address the issues
18 surrounding cost recovery of DR programs. The Commission has correctly chosen to address
19 these unresolved DR cost recovery matters in the present proceeding.

³ See D.12-04-045 at 204.

⁴ See D.12-04-045 at 204.

- 1 • *Should the current cost recovery policy be changed? Please describe your*
2 *proposed alternate cost recovery methods for the Supply Resource and Load*
3 *Modifying Resource demand response programs in the future?*

4 MCE believes in certain circumstances the current cost recovery policy is anti-
5 competitive by design and must be changed. DR program cost recovery should be directly
6 correlated with the ratepayers who are allowed to participate in the DR program and the LSEs
7 which derive the primary benefit from the DR program. It is MCE's understanding that most, if
8 not all, IOU-run DR programs at present that provide capacity value result in a pass-through
9 reduction in Resource Adequacy ("RA") obligations to all LSEs within the IOU's service
10 territory. To the extent that a DR program results in reductions of RA obligations for only the
11 IOU, then this DR program should be deemed a procurement-related program and funded like all
12 other procurement-related products, through funds collected by the individual LSE's generation
13 rate. Similarly, to the extent that only an IOU's bundled customers are allowed to participate in
14 a certain DR program, then that DR program should only be funded by the IOU's bundled
15 customers. Either such instance of exclusive benefit or exclusive customer participation results
16 in anti-competitive cross-subsidies under the current cost recovery framework.

17 For the remaining DR programs, which do not exclusively benefit the IOU or the IOU's
18 bundled customers, MCE recommends these programs be funded through a mechanism similar
19 to Energy Efficiency program funding. Like EE, these programs would have their costs
20 recovered from funds collected by all ratepayers through their delivery rates. Additionally these
21 funds would be made available to all LSEs through an application process, where individual DR
22 programs can be vetted and funded on a case by case basis. While this approach would not alter
23 the manner in which these DR program costs are recovered, it would broaden access to these

1 funds to all LSEs so that greater diversity of DR program design and increased ratepayer
2 participation would result.

3 Lastly, the Commission should strive to minimize the application of the Cost Allocation
4 Mechanism (“CAM”) to new DR derived capacity. MCE has substantial concerns about how the
5 restructuring of the DR framework may potentially present new openings for DR-based RA to be
6 assigned CAM cost recovery status. As stated earlier, capacity resources that are granted CAM-
7 eligibility severely limit a CCA’s ability to efficiently procure capacity resources for meeting the
8 CCA’s RA obligations. This results in excessive over-contracted capacity, and unnecessary cost
9 burdens imposed upon CCA customers. DR should not be leveraged in an anti-competitive
10 manner, whether through anti-competitive program cost recovery, or through restricting a CCA’s
11 ability to efficiently procure capacity due to increased usage of the CAM cost-sharing
12 framework.

- 13 • *Are there fairness issues that the Commission should consider for*
14 *Commission-regulated utilities and other Load Sharing Entities? Please describe*
15 *these issues in detail, with specific recommendations for resolving and/or*
16 *avoiding these issues.*

17 MCE responds to the guidance question with the assumption the Commission was
18 referring to Load-Serving Entities, as defined by California Public Utilities Code section 380 (j),
19 rather than the undefined term of “Load Sharing Entities.” MCE believes there are significant
20 fairness issues relating to the current approach of DR cost recovery. At present, all ratepayers
21 fund the IOU-run programs through their delivery charges without any sensitivity to which
22 ratepayers are allowed to participate and which LSEs receive direct benefits for the program.
23 This lack of sensitivity to the correlation of program costs, participation and benefits present
24 opportunities for anti-competitive cross-subsidies to manifest. These concerns about cross-
25 subsidization are very material and not theoretical.

1 For example, CCA customers are prohibited from participating in PG&E’s Residential
2 and Commercial SmartRate programs, Scheduled Load Reduction program, and Peak Day
3 Pricing Program.⁵ For the remaining IOU-run DR programs such as Air Conditioning Cycling
4 (“AC Cycling”), these programs are ill-suited for many ratepayers due to their location. For
5 example MCE’s customers derive little value in participating in PG&E’s AC Cycling program
6 because they reside in a mild costal climate and have limited air conditioning-related electricity
7 usage. In other words many ratepayers, including MCE customers, are currently being forced to
8 fund existing DR programs, which either prohibit their participation or are not designed to meet
9 these ratepayers’ needs and constraints. Thus, these ratepayers are subsidizing DR programs for
10 the benefit of bundled customer participation. This cost recovery and program eligibility
11 construct is unfair and anti-competitive.

12 MCE recommends the best way to resolve these fairness issues is to (i) revise the cost
13 recovery methodology for DR programs as described prior, (ii) ensure that CCA customers have
14 access to any and all DR programs which they are paying for and (iii) enable non-IOU LSEs to
15 design and administer DR programs that will better meet the needs of their customers. CCA
16 customers should not be prohibited from participating in IOU-run DR programs purely because
17 these customers are not receiving IOU generation services. Additionally CCA’s should not be
18 prohibited from providing DR programs that better suit the needs of their customers. Lastly,
19 CCA customers should not be obligated to pay for IOU-run DR programs that provide no
20 material benefit to CCAs and CCA customers.

⁵ <http://www.pge.com/myhome/customerservice/energychoice/communitychoiceaggregation/faq/index.shtml>

1 **IV. Phase 3 Issues and Questions**

2 **B. Goals for Demand Response**

- 3 • *Parties should provide recommendations for increasing individual demand*
4 *response program load impacts and overall participation in demand response*
5 *programs.*

6 MCE believes that opening up DR program design and administration to all LSEs would
7 greatly increase program load impacts and overall participation in DR programs. As highlighted
8 prior, the current IOU-run programs are unnecessarily exclusive to certain ratepayers while also
9 being poorly designed to meet the constraints of specific ratepayer subgroups. MCE believes
10 CCA-run DR programs would be more responsive to specific ratepayer needs and would receive
11 higher participation rates, by virtue of the community-based local government structure of a
12 CCA. Furthermore, the IOU service territories are too broad and ratepayer needs are too varied
13 to be properly addressed exclusively by IOU service territory-wide DR programs. By revising
14 the cost recovery mechanisms and by removing key roadblocks, such as access to timely
15 customer usage data via AMI, to enable all LSEs to fairly participate in DR program design and
16 administration, the state will benefit from increased DR program load impacts and broader
17 ratepayer participation and appreciation for DR programs.

18 **C. Resource Adequacy Concerns (as directed by D.14-03-026)**

- 19 • *Parties should provide a detailed explanation of their resource adequacy*
20 *concerns, specific to the bifurcation framework adopted in D.14-03-026).*

21 MCE has two concerns tied to RA obligations and how they related to DR programs.
22 First, the present cost recovery methodology creates anti-competitive cross-subsidization by
23 unbundled ratepayers to bundled ratepayers, by funding DR some programs that exclusively
24 benefit the RA obligations of the IOUs through delivery-side funds or limiting program
25 participation to only bundled ratepayers. As described earlier, MCE believes this issue can be

1 resolved by requiring that these exclusive DR programs be funded purely through generation-
2 side funds.

3 Second, MCE has substantial concerns about the restructuring of the DR framework
4 potentially presenting new opportunities for DR-based RA to be assigned CAM cost recovery
5 status. As stated earlier, capacity resources that are granted CAM-eligibility severely limit a
6 CCA's ability to efficiently procure capacity resources for meeting the CCA's RA obligations.
7 This results in excessive over-contracted capacity and unnecessary cost burdens imposed upon
8 CCA customers. DR programs should not be leveraged in an anti-competitively manner,
9 whether through anti-competitive program cost recovery, or through restricting a CCA's ability
10 to efficiently procure capacity due to increased usage of the CAM cost-sharing framework.

11 **D. Supply Resource Issues**

12 • *Parties are invited to provide their overall comments on the Demand*
13 *Response Auction Mechanism (DRAM) provided in Attachment B. Parties are*
14 *asked to respond to the additional questions asked here:*

15 □ *This proposal currently envisions Commission-regulated utilities*
16 *procuring DRAM capacity on behalf of their own load, and does not*
17 *include a procurement obligation for other Load Sharing Entities.*
18 *Comment on whether Load sharing entities should also have a*
19 *procurement obligation for DRAM capacity and, if so, how such*
20 *procurement should be structured. Be as specific as possible.*

21 As stated before, MCE responds to the guidance question with the assumption the
22 Commission was referring to Load-Serving Entities, as defined by California Public Utilities
23 Code section 380 (j), rather than the undefined term of "Load Sharing Entities." The
24 Commission does not have jurisdictional oversight over a CCA's procurement, unless explicitly
25 authorized by statute in specific context. Oversight of CCA procurement is left to the CCA's
26 governing board. Unlike the Energy Storage procurement obligation that had a specific statutory
27 basis for imposing a procurement obligation upon all LSEs, the Commission has no statute

1 explicitly necessitating the implementation of the DRAM. As such, the Commission should
2 neither attempt to obligate CCAs to participate in the DRAM, nor attempt to mandate DR
3 procurement for CCAs through another form. At the Commission led workshop on the DRAM
4 that took place on April 28, 2014, Energy Division (“ED”) staff acknowledged that the DRAM is
5 by design intended to meet an arbitrarily selected Supply Resource DR *target* and not statutorily
6 mandated *obligation*.

7 Furthermore, the DRAM should not present an opportunity for CAM-eligible capacity
8 procurement for the IOUs through DR. The DRAM is designed to solicit capacity-only DR
9 offerings so the DR procured through this mechanism will be purely to meet transmission-level
10 reliability needs, via the RA obligation, and not to provide any direct distribution level reliability
11 functionality. As such, any capacity contracted through the DRAM, be it system, local, and/or
12 flexible capacity, is equitable to the capacity products that all LSEs are obligated to procure
13 through RA. There will be no additional distribution-grid reliability attributes with these
14 solicitations to justify special cost recovery treatment, thus all capacity contracted through the
15 DRAM should be deemed CAM-eligible ineligible.

- 16 • *Provide your comments on whether a utility-centric model for supply resource*
17 *demand response can meet current and future needs. Provide your comments on*
18 *the ability of third-party providers to provide supply resource demand response to*
19 *meet current and future needs. As discussed in D.12-04-045, should the Utilities*
20 *continue to offer rate-regulated supply resource demand response if these*
21 *services are provided through competitive markets? Should the Commission focus*
22 *on identifying more of these programs as supply resources, thus facilitating*
23 *broader competitive in the market? Should the utilities’ role be solely to oversee*
24 *the competitive procurement?*

25 Utility-centric DR programs at present are both anti-competitively funded and designed.
26 MCE supports broader competition and increased customer choice within the DR market by

1 enabling all LSEs to design and administer DR programs. CCA-run Supply Resource demand
2 response programs should be encouraged and not obstructed.

3 **E. Load Modifying Resource Issues**

- 4 • *Provide your comments on whether a utility-centric model for load modifying*
5 *resource demand response can meet current and future needs. Provide your*
6 *comments on the ability of third-party providers to provide Load Modifying*
7 *Resource demand response to meet current and future needs. As discussed in*
8 *D.12-04-045, should the Utilities continue to offer rate-regulated supply resource*
9 *demand response if these services are provided through competitive markets?*
10 *Should we limit the utilities' role in providing load modifying resource demand*
11 *response? How?*

12 Utility-centric DR programs at present are both anti-competitively funded and designed.
13 MCE supports broader competition and increased customer choice within the DR market by
14 enabling all LSEs to design and administer DR programs. CCA-run Load Modifying demand
15 response programs should be encouraged and not obstructed.

16 **F. Program Budget Application Process**

- 17 • *Please provide your comments on why the Commission should consider*
18 *longer budget cycles. Provide justification for the specific length of the budget*
19 *cycle.*

20 MCE supports longer DR budget cycles because they will minimize regulatory
21 uncertainty and reduce strain on the regulatory resources of concerned parties. To the extent that
22 DR budget cycles are lengthened, there should be clear guidelines for how all LSEs can propose
23 new or revised DR programs and pilots mid-cycle. Furthermore, as new CCAs form and launch
24 service to customers, there should be a clear on-ramp process for these CCAs to begin
25 participating in DR budget cycles, mid-cycle.

1 **V. Conclusion**

2 The present Investor Owned Utility-centric DR market is constructed in an anti-
3 competitively manner and must be repaired. The anti-competitive manner in which all DR
4 program costs are recovered from all ratepayers via delivery rates, without regard to ratepayer
5 benefits, is unfair and needs to be corrected. Many of the current IOU-run DR programs prohibit
6 CCA customer participation in spite of these customers' contributions to the funding of these
7 programs. The process for accessing some DR funding should be revised to follow the approach
8 used for EE program funding, and allow for CCAs, and other non-IOU LSEs, to administer DR
9 programs that can better respond to local needs and opportunities. Beyond basic access to DR
10 program funding, there are significant technical barriers which prohibit CCAs from offering their
11 own DR programs. These barriers include both the lack of access that CCAs have to timely
12 customer usage data through the AMI backbone, and the anti-competitive impacts of the
13 incentives used to stimulate ratepayer participation in the current IOU-run DR programs.

14 MCE believes the Commission should not lose sight of these fundamentally anti-
15 competitive flaws within the current DR program framework. Before creating additional market
16 complexity through constructs such as the DRAM, the Commission should do all that it can to
17 make the fundamental DR program framework competitively neutral. The Commission should
18 strive to resolve technical roadblocks and enable participation of CCAs, and other non-IOU
19 LSEs, in the DR market. Such participation amongst all LSEs will both increase the diversity of
20 DR program offerings and increase ratepayer participation in DR programs. This will in turn
21 increase the benefit to all ratepayers through more efficiently operated and lower cost electricity
22 and capacity services.

Exhibit A

Statement of Qualifications of Jeremy Waen

Q1 Mr. Waen, please state your name, position, and address.

A1 My name is Jeremy Waen. I am a Regulatory Analyst at Marin Clean Energy. My business address is 781 Lincoln Avenue, Suite 320, San Rafael, California 94901.

Q2 Please describe your background.

A2 I am a full-time employee for the Marin Clean Energy where I fulfill the role of Regulatory Analyst. I participate in proceedings on MCE's behalf on a wide range of topics that include, among others, greenhouse gas allowances, energy efficiency and cost allocation. I also assist MCE with maintaining regulatory compliance. Prior to working at MCE, I served as an Energy Analyst at the San Francisco Public Utilities Commission ("SFPUC") as part of their Regulatory and Legislative Affairs group within the Department of Power. There I participated in regulatory matters before the CPUC and CARB relating to SFPUC's interests as both an emerging Community Choice Aggregation, and a Publicly Owned Utility. Prior to that, I worked as an advocate for distributed generation of renewable energy with the Clean Coalition. I hold a Master of Public Administration in Sustainable Management from the Presidio Graduate School, located in San Francisco, California and a Bachelor of Arts in Chemistry from Reed College, located in Portland, Oregon. My resume is attached as Exhibit B.

Q3 What is the purpose of your testimony?

A3 I am sponsoring "Testimony of Marin Clean Energy on Cost Recovery and Competitive Neutrality Issues identified in Phase 2 and 3 of the Demand Response."

Q4 Does this conclude your statement of qualifications?

A4 Yes it does.

Exhibit B

Resume of Jeremy Waen

JEREMY WAEN | REGULATORY ANALYST

MARIN CLEAN ENERGY | 781 LINCOLN AVE, SUITE 320 | SAN RAFAEL, CA 94901

EXPERIENCE

Regulatory Analyst - *Marin Clean Energy* - San Rafael, CA **January 2012 - Present**

Energy Analyst - *SF Public Utilities Commission* - San Francisco, CA **July 2011 – December 2011**

Volunteer Associate - *Clean Coalition* - Palo Alto, CA **June 2010 - July 2011**

Consultancy Intern - *Collective Invention* - Berkeley, CA **2009 - 2011**

Research Chemist - *Applied Intellectual Capital Labs* - Alameda, CA **2007 - 2009**

Research Assistant - *Lawrence Livermore National Laboratory* - Livermore, CA **Summer 2006**

Research Assistant - *Caltech & NASA Jet Propulsion Laboratories* - Pasadena, CA **Summer 2004**

EDUCATION

MPA in Sustainable Management - *Presidio Graduate School* - San Francisco, CA **May 2011**

BA in Chemistry - *Reed College* - Portland, OR **May 2006**

PRESENTATIONS & EVENTS

Agrion Panel Discussion – *The California Shared Renewable Energy Program* – San Francisco, CA **April, 2014**

Young Professionals in Energy International Summit – *2nd Annual* – Las Vegas, NV **April, 2012**

US Energy Policy Presentation – *School of Renewable Energy Technology* – Phitsanulok, Thailand **January, 2012**

ACS Summer School – *Green Chemistry & Sustainable Energy* – Montreal, Canada **June-July, 2011**

Young Professionals in Energy International Summit – *1st Annual* – Las Vegas, NV **April, 2011**

Workshop: Lifecycle Assessment for Business Leaders – *UC Berkeley* – Berkeley, CA **March, 2011**

United Nations Framework Convention on Climate Change COP16 – Cancun, Mexico **December, 2010**

HIGHLIGHTS

POLICY: Monitoring numerous proceedings at CPUC, CEC, & CARB for their impacts on Community Choice Aggregators (CCA). Advocating for fair and equitable CCA regulations through formal comments, protests, & testimony.

COLLABORATION: Coordinating efficient cross-functional team operations. Assessing strengths, promoting collaboration, and optimizing problem-solving for elegant outcomes. Trained in multiple team-building techniques.

ENGAGEMENT: Networking with NGOs, government agencies, industry associations, & activist groups about clean energy policy. Volunteering as event coordinator for San Francisco Bay Area Chapter of Young Professionals in Energy.

STRATEGY: Consulted with local and regional governments: City of Brisbane & Joint Policy Committee. Researched data on jobs and economics related to development of electric vehicles, local renewable power, and energy efficiency.

IMPLEMENTATION: Investigated urban redevelopment of retired naval base in the City of Alameda, CA. Engaged city staff, councils, utilities, businesses, citizens, and impacted tenants to propose alternate sustainable strategies. **SCIENCE:** Researched multiple clean technology topics in both laboratory and literature including flow-cell batteries for grid energy storage, batteries for electric vehicles, and waste remediation. Focused on sustainable green chemistry.

FACILITATION: Supported scenario-planning session on systems thinking and life cycle assessment for US EPA's "Resource Conservation Challenge 2010 Workshop." Interviewed participants, compiled results, and proposed action.

FIELD WORK: Conducted successful 3-man month-long pilot-scale mine tailing remediation in Namibia, Africa. Fostered strong team development despite foreign environment, multinational participants, and hazardous conditions.

JEREMY WAEN

PREPARED TESTIMONY

1. CPUC Application 12-06-002
Opening Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2013 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast (August 16, 2012)
2. CPUC Application 12-03-001
Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for Approval of Economic Development Rate for 2012-2017 (August 24, 2012)
3. CPUC Application 12-04-020
Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application to Establish a Green Option Tariff (October 19, 2012)
4. CPUC Application 12-11-009
Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2014 General Rate Case Phase 1 (May 17, 2013)
5. CPUC Application 12-11-009
Rebuttal Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2014 General Rate Case Phase 1 (June 28, 2013)
6. CPUC Application 13-05-015
Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2014 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast (September 16, 2013)
7. CPUC Application 13-08-002 *et al.*
Testimony of the Marin Energy Authority on Phase 1 of the Consolidated IOU Applications for Approval of Greenhouse Gas Cap-and-Trade Program Cost and Revenue Allocations Necessary to Incorporate GHG Costs and Revenues into 2014 Rates and to Issue the First Climate Dividend (October 10, 2013)
8. CPUC Application 13-04-012
Testimony of the Marin Energy Authority on Phase 2 of the 2014 General Rate Case for the Pacific Gas and Electric Company (December 13, 2013)
9. CPUC Application 12-01-008, 12-04-020, & 14-01-007
Testimony of Marin Clean Energy on Pacific Gas and Electric Company's and San Diego Gas and Electric Company's Applications to Establish Green Tariff Shared Renewables Programs (January 10, 2014)
10. CPUC Application 12-01-008, 12-04-020, & 14-01-007
Testimony of Marin Clean Energy on Southern California Edison Company's Application to Establish Green Tariff Shared Renewables Program (April 11, 2014)