

Brigid Rowan

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Professional Profile

Brigid Rowan is an energy economist with over 20 years of experience in the areas of energy and regulatory economics (related to conventional, unconventional and renewable energy, and energy efficiency). Ms. Rowan's practice addresses pipeline economics and regulation, economic development and environmental impacts of various energy supply and transportation options, evolving North American oil, gas and electricity markets, as well as regulation of natural gas and electricity.

Since 2011, her practice has focussed on oil supply and transportation (notably Canadian tar sands, shale, pipelines and rail). She has co-authored reports and expert testimony on the most controversial oil projects in North America, including ["Pipe Dreams? Jobs Gained, Jobs Lost by the Construction of Keystone XL."](#) "Pipe Dreams" is an [influential and widely publicized](#) study on the employment impacts of the Keystone XL pipeline.

Ms. Rowan has provided consulting services in energy economics and regulation and expert evidence in Quebec, Ontario, Manitoba, British Columbia, Washington, California, Colorado, North Dakota, South Dakota, New York, New Jersey and New England, as well as at the National Energy Board (NEB) in Canada. She has provided testimony in over 25 regulatory proceedings before the *Régie de l'énergie du Québec* (Quebec Energy Board) and co-authored expert evidence at Canada's National Energy Board (NEB). Brigid's clients include public interest, environmental and indigenous groups, energy companies, start-ups and governments. She has also worked with start-ups in senior management, as well as large corporations in energy marketing, communications and government relations throughout Canada, the US, and internationally.

Energy Economics and Energy Industry Experience

**2006 – present Senior Energy Economist, The Goodman Group, Ltd.,
Berkeley, California**

Provide energy consulting services including expert reports, testimony, policy assessment, research, intervenor and litigation support related to energy regulation and economics (conventional, unconventional and renewable energy, and energy efficiency).

Specialize in the pipeline economics and regulation, economic development and environmental impacts of various energy supply and transportation options, evolving North American oil, gas and electric markets, and regulation of natural gas and electricity distributors.

Major Projects:

Economic Development and Environmental Impacts of Energy Options

- Since 2006, has co-authored or collaborated in approximately 25 national, regional, and state/provincial studies on the economic development impacts (notably jobs) and environmental impacts of various energy supply and transportation options in the US and Canada.
- Since 2011, has co-authored nine expert reports on the economic development impacts and environmental impacts of crude oil transportation (particularly interjurisdictional tar sands crude pipeline projects and crude by rail projects) and one on a natural gas pipeline.
- Co-authored written Expert Testimony on the Need for the Vancouver Energy Distribution Terminal (VEDT) with Ian Goodman. The expert report was filed in May 2016 before the State of Washington Energy Facility Site Evaluation Council on behalf of Earthjustice. The testimony concludes that the VEDT will do little if anything to supply Washington with energy. Consequently, there is no economic need for this Project to supply the state.

The testimony also shows that the VEDT is likely not in Washington's public interest. TGG's cross-jurisdictional study of the costs and benefits of energy logistics facilities for host jurisdictions consistently concludes the following: the benefits are relatively small; the cost/risks are relatively large; and the economic benefits and costs/risks tend to be unevenly distributed (across stakeholders and regions), with the project proponents getting the majority of the benefits and the hosting jurisdiction bearing the

majority of the costs/risks.

- Co-authored the "[Expert Report on the PennEast Pipeline Project Economic Impact Analysis for New Jersey and Pennsylvania](#)" with Ian Goodman, commissioned by the New Jersey Conservation Foundation. This November 2015 report evaluates the economic impact study (PennEast Pipeline Project Economic Impact Analysis) prepared for the PennEast Pipeline Company. The PennEast Analysis claims that the pipeline project to transport Marcellus shale natural gas from Pennsylvania to New Jersey would have considerable economic benefits in both states. Goodman and Rowan demonstrate that the PennEast Analysis significantly overstates the total jobs from designing and building the pipeline by approximately two thirds or more.
- Co-authored written expert testimony, entitled "[Changes to the Economic Costs and Benefits of the Keystone XL Pipeline for South Dakota](#)" with Ian Goodman. The testimony filed in April and June 2015 at the South Dakota Public Utilities Commission on behalf of the Rosebud Sioux Tribe and withdrawn in July 2015. Based on the conclusions of pipeline safety expert, Richard Kuprewicz, Rowan and Goodman estimate a range of Worst-Case Scenario Costs starting at US\$1 billion and escalating to \$2 billion or more for a very high consequence event. Given the Keystone XL's very small employment and property tax benefits, TGG concludes that, under a range of worst-case scenarios, the costs of the Project will greatly exceed the benefits for South Dakota.
- Co-authored the "[Economic Costs and Benefits of the Trans Mountain Expansion Project \(TMX\) for BC and Metro Vancouver](#)" with Ian Goodman in collaboration with Simon Fraser University's Centre for Public Policy Research. The report, released in November 2014 and re-released in February 2015, refutes Kinder Morgan's claims regarding the positive economic development benefits of its controversial pipeline project. Goodman and Rowan show that the benefits of the pipeline are very small and have been significantly overstated by Kinder Morgan, whereas the worst-case costs of a catastrophic spill are very large and have been vastly understated.
- Co-authored the "[Economics of Transporting and Processing Tar Sands Crudes in Quebec](#)" with Ian Goodman in collaboration with Équiterre and Greenpeace Canada. The January 2014 report demonstrates that the

economic development benefits for Quebec of moving and refining tar sands crudes would be insignificant while the costs and risks are very high.

- Co-authored an "[Analysis of the Potential Costs of Accidents/Spills Related to Crude by Rail](#)" with Ian Goodman on behalf of Oil Change International (OCI). The November 2013 report demonstrates that the economic costs of crude by rail accidents can be very large and concludes that a major crude by rail (CBR) unit train accident/spill could cost \$1 billion or more for a single event. The report was incorporated into [Comments filed by NRDC, Sierra Club and OCI before PHMSA as part of the Advance Notice of Proposed Rulemaking Hazardous Materials: Rail Petitions and Recommendations To Improve the Safety of Railroad Tank Car Transportation, December 5, 2013](#).
- Co-authored expert testimony, entitled "[The Relative Economic Costs and Benefits of Enbridge's Line 9B Reversal and Line 9 Capacity Expansion Project](#)" with Ian Goodman. The expert report was filed in August 2013 at Canada's National Energy Board on behalf of the Équiterre Coalition, a coalition of Quebec- and Ontario-based environmental groups. In light of pipeline safety expert, Richard Kuprewicz's high-risk assessment for rupture on the Project, Goodman and Rowan demonstrate that due to Line 9B's extraordinary proximity to people, water and economic activity, the rupture costs of the Project (under a wide variety of pipeline accident/spill possibilities) range from significant to catastrophic. They conclude that the potential economic costs could exceed (and, under a wide range of accident/spill conditions, greatly exceed) the potential economic benefits.
- Co-authored "[Comments on Initial Study/Mitigated Negative Declaration \(IS/MND\) Valero Crude by Rail Project Benicia, California](#)" with Ian Goodman on behalf of NRDC. The July 2013 report provides a Market Analysis of a proposed crude by rail project for the Valero Benicia Refinery. Goodman and Rowan conclude that the proposed project could significantly affect crude supply (and thus quality) for the refinery, and recommend that a full Environmental Impact Report be undertaken. The report was included as an attachment to [NRDC's Comments on Notice of Intent to Adopt a Mitigated Negative Declaration for the Valero Crude by Rail Project, filed with the City of Benicia on July 1, 2013](#).

- Co-authored a [“Report evaluating the adequacy of the Keystone XL \(KXL\) Draft Supplemental Environmental Impact Statement \(DSEIS\) Market Analysis”](#) with Ian Goodman, and filed as an attachment to the Comments on KXL DSEIS jointly submitted by the Sierra Club, NRDC, and 14 other environmental and public interest organizations in April 2013. Based on their evaluation of the early 2013 market conditions (including emerging crude markets, factors driving tar sands expansion, availability and cost of crude oil transportation, and tar sands breakeven costs), Goodman and Rowan conclude that (i) the US State Department's DSEIS Market Analysis was deeply flawed and not a sound basis for decision-making; and (ii) KXL, and specifically its impact on tar sands logistics costs and crude prices, would have a significant impact on tar sands expansion under a very broad range of conditions and assumptions.
- Co-authored an [influential and widely publicized](#) study of the Keystone XL pipeline employment impacts ([“Pipe Dreams? Jobs Gained, Jobs Lost by the Construction of Keystone XL”](#)) with Ian Goodman and the Cornell Global Labor Institute. The report was released in September 2011 and updated in January 2012. Goodman and Rowan provided the economic analysis to demonstrate that TransCanada Pipelines Ltd had greatly exaggerated the employment impacts of the Keystone XL (KXL) Project. TGG estimated the Project would create no more than 2,500-4,650 temporary direct construction jobs for two years and at the most a handful of permanent jobs (ranging from a low of 20 to a high of 127). TGG’s conclusions in Pipe Dreams were used to demonstrate to the US media and to the Obama Administration that KXL would not be a major job creator for the US, nor would it have any substantial impact on US unemployment.
- Co-authored “Employment Impacts of Air-Pollution Controls at North Dakota Coal Plants” with Ian Goodman. This November 2011 study for Sierra Club National estimated the employment impacts of Air-Pollution Controls at North Dakota Coal Plants.
- Collaborated in the preparation of expert testimony on behalf of The Greenlining Institute on economic development impacts (focusing on job creation and stimulus) of capital expenditures and rate increases proposed by the Pacific Gas & Electric Company in its 2011 General Rate Case; co-authored an analysis of the Economics of Supplier Diversity with Ian Goodman, as supplementary evidence for the same case.

- Collaborated in the analysis for the Avoided Energy Supply Costs in New England: 2009 Report, prepared for Avoided-Energy-Supply-Component (AESC) Study Group, which represents all major electric and gas utilities in New England, as well as efficiency program administrators, state energy offices and regulators. TGG's contribution to this report was an analysis of the economic development impact of Massachusetts electricity and gas energy efficiency programs.
- Co-authored several national and regional analyses with Ian Goodman for SunPower Corporation (an international solar electric manufacturer based in California) focussing on the economic development and environmental benefits of solar manufacturing and reduction of coal use.

2004 – 2013 **Senior Energy Economist,
Econalysis Consulting Services,
Montreal, Quebec**

Provided written evidence and/or testified in over 25 regulatory proceedings before the *Régie de l'énergie du Québec* (Quebec Energy Board) on behalf of Option consommateurs in energy regulatory proceedings. The cases involved Quebec gas distributors (Gaz Métro and Gazifère), as well as Hydro-Québec Distribution (the electricity distributor) and Hydro-Québec Transport (the electricity transmission company).

Offered strategic advice and analytical expertise to public interest intervenors and their counsel in energy regulatory proceedings through the preparation of interrogatories, testimony, cross-examination, and final argument.

Actively participated in working groups, negotiations and consultations related to energy stakeholder issues in Quebec.

Hired, coordinated and collaborated with subject-matter experts in various energy regulatory proceedings.

Managed Econalysis' team of Quebec-based energy analysts from 2005-2007.

Major Projects:

- Prepared evidence and coordinated expert participation on behalf of Option consommateurs in Gaz Métro's 2013 case with respect to the renewal of its Distribution Incentive Mechanism.
- Prepared evidence and testified on behalf of Option consommateurs in Gaz Métro's 2013 rate case with respect the Supply Plan, a Gas Procurement Incentive Mechanism, operating costs and other rate issues.
- Prepared evidence and testified on behalf of Option consommateurs in Gaz Métro's 2012 rate case with respect to the profitable development of the residential market, cost allocation and rate strategy.
- Prepared evidence and testified on a range of regulatory issues (notably energy efficiency programs for lower-income consumers) on behalf of Option consommateurs in 2004-2007 regulatory hearings relating to Hydro-Québec and Gaz Métro.

**2001 – 2004 Principal, Energy and Communications Consultant,
Just Brigid Energy & Communication
Montreal, Quebec**

Provided comprehensive English communications and website production services with a specialization in energy and the environment.

Clients included: Quebec Ministry of the Environment, Équiterre, Quebec Centre for Action on Climate Change, Madinina Software.

Managed the redesign, production and relaunch of a new website for Équiterre, Quebec's largest environmental group (www.equiterre.org) and advised on the web strategy for the Quebec Centre for Action on Climate Change.

**1998 – 1999 Energy Consultant, Econalysis Consulting Services
Toronto, Ontario**

Assisted in the preparation of expert testimony in English and French and conducted research for public interest intervenors in Quebec, Ontario and Manitoba energy regulatory proceedings.

**1998 IBM Canada,
Client Manager, Utility & Energy Services Industry
Toronto, Ontario**

Managed IBM client relationships at Canada's largest energy utilities via the direct marketing channel.

**1996 – 1997 IBM Canada,
Direct Marketing Specialist, Industry Solutions Unit,
Toronto, Ontario**

Managed diverse teams (database specialists, graphic designers, copywriters, translators, ad agencies, direct mail houses) to implement Quebec-based B2B direct marketing campaigns for the energy and telecommunications industry, including pioneering web campaigns.

Successfully implemented five campaigns, three of which generated response rates of 10-35% and respective revenues of over \$2.5 million.

**1995 – 1996 Energy Analyst, The Goodman Group, Ltd.,
Boston, Massachusetts**

Collaborated in the preparation of expert testimony regarding Hydro-Québec's cycle of electricity surpluses and sales promotion in domestic and export markets on behalf of Commission Staff for a Quebec Government Commission on Hydro-

Québec's purchasing policies with respect to independent power producers
Assisted with the research and writing of various expert reports on energy economics for environmental and indigenous groups.

1992 – 1993 **Energy Analyst, Stephen Graham Associates,
Ottawa, Ontario**

Prepared a series of documents for policymakers on the economic, political and technical feasibility of various alternative energy options in developing countries.

Senior Management and Management Consulting Experience

1999 – 2001 **Acting CEO and Co-Founder
Sites.com, New York, NY**

Oversaw operations for this New-York-based search engine/publishing start-up including web content development, book production (circulation 15,000 copies), sales and marketing, human resources, finances, facilities, telecommunications, information technology.

Developed marketing strategy including branding, advertising, marketing channels and media relations; managed the development of offline and online marketing communications.

Participated in all aspects of strategy and business plan development.

1994 – 1995 **Director of Communications,
International Children's Institute, Toronto, Ontario**

Created and presented several successful proposals to obtain government and foundation funds in excess of \$500,000 for this Canadian NGO, which assists traumatized refugee children.

Managed the production of communications materials for Institute pilot projects in Toronto and Croatia.

1993 – 1994 **Public Sector Management Consultant, Groupe SECOR,
Ottawa, Ontario**

Selected Projects:

Republic of BENIN

- Co-produced a study in French on public sector reform in Benin as a member of a team assisting the President of Benin in strengthening government systems to support the political transition to democracy

Marketing Communications for the World Bank

- Developed a marketing package for Groupe SECOR to familiarize World Bank officials with the firm's capabilities and experience.

Government Relations Experience

1988 **IBM Canada,
Public Affairs Specialist
Toronto and Ottawa, Ontario**

Produced an IBM position paper encouraging high tech initiative in Canada.
Prepared political briefing material for company executives.

1988 **IBM Europe,
Public Affairs Specialist
Brussels, BELGIUM**

Wrote an article on the effects of the 1988 US Trade Bill on American subsidiaries in Europe for *Commerce in Belgium*, a business journal.
Prepared a report on broadcast advertising in a united Europe and the effects of EU advertising directives on IBM's business.
Researched the potential effects of the Montreal Protocol on IBM Europe and recommended that IBM Europe not align itself with companies (such as Dow Chemical), who lobbied against the Protocol.

Education

**Master of Arts, International Affairs, International Political Economy
(Environmental Specialization),**

Norman Paterson School of International Affairs,
Carleton University, Ottawa, Ontario, 1996.

Thesis examines how the Cree of Northern Quebec (a Canadian First Nations group) used economic arguments and energy regulation to successfully oppose Hydro-Québec's construction of the Great Whale dam.

Bachelor of Arts, Honours Economics, Computer Science Minor

(Cooperative Education Program),
University of Waterloo, Waterloo, Ontario, 1990.

Other: Financial Literacy Program for Directors and Executives,
Rotman School of Management, University of Toronto, 2007.

Languages: English, French, Spanish, Italian.

Appointments, Achievements and Awards

Greenpeace Canada (2006 – 2015): Board member; Treasurer and Chair of the Finance Committee (2008-2015); Chair the Nominations Committee (2012-2015); Member of the Board Search Committee to Recruit Executive Director (2012).

Liberal Party of Canada (2015): Provided talking points and strategic advice to Will Amos (new Member of Parliament for the Pontiac riding) on a clean energy jobs strategy for the Pontiac in preparation for an all-party climate change debate.

Quebec Centre for Action on Climate Change (2004): provided pro-bono web strategy advice and website production oversight

Équiterre (2003-2004): managed the redesign, production and relaunch of a new website for Équiterre, Québec's largest environmental group (www.equiterre.org)

Humber School for Writers (2002): scholarship for a fiction-writing workshop

IBM Canada Team Success Award (1997 and 1998) and **IBM Canada Public Affairs Award** (1988): presented for an outstanding contribution to the Public Affairs Department

Canadian Club at Harvard University (1996): participated in a round table discussion on energy exports with former Quebec Premier, Robert Bourassa

Ottawa Co-Director, Pollution Probe (1993): co-directed the 1993 Ottawa fund-raising drive for this Ontario-based ENGO

Ontario Public Interest Research Group (1992): co-organized a panel discussion at the Canadian Parliament Buildings on hydro projects in the Canadian North for Indigenous and federal politicians and members of the public

Carleton University Grant for Graduate Studies (1991-93): grant requirements included conducting tutorials for undergraduate Economics courses

University of Waterloo Nordic Ski Team (1988-90): competed at the provincial level

Competitive Cycling (1986-89): competed at the national and provincial levels.

Publications and Major Reports

Expert Report on the PennEast Pipeline Project Economic Impact Analysis for New Jersey and Pennsylvania, commissioned by the New Jersey Conservation Foundation, *November 4, 2015* (co-author with Ian Goodman).

Comments on Scoping Supplemental Environmental Impact Statement (SEIS) Rulemaking for Colorado Roadless Coal Exception #46470 to the U.S. Department of Agriculture Forest Service on behalf of the Sierra Club, *May 22, 2015* (co-author with Ian Goodman).

Comments on Draft Environmental Impact Report (DEIR) Analysis of Oil and Gas Well Stimulation Treatments in California on behalf of NRDC, *March 16, 2015* (co-author with Ian Goodman), incorporated as an attachment to Comments filed by Natural Resources Defense Council (NRDC), Center for Biological Diversity (CBD), Sierra Club, Los Angeles Waterkeeper on the Department of Conservation's, through its Division of Oil, Gas and Geothermal Resources (DOGGR), Draft Environmental Impact Report (DEIR) for Well Stimulation in California (the Project) prepared pursuant to the California Environmental Quality Act (CEQA).

Economic Costs and Benefits of the Trans Mountain Expansion Project (TMX) for BC and Metro Vancouver in collaboration with The Centre for Public Policy Research, Simon Fraser University, *November 10, 2014* (co-author with Ian Goodman, re-released *February 4, 2015*).

Report on the Economics of Transporting and Processing Tar Sands Crudes in Quebec in collaboration with Équiterre and Greenpeace Canada, *January 2014* (co-author with Ian Goodman).

Analysis of the Potential Costs of Accidents/Spills Related to Crude by Rail, *November 8, 2013* (co-author with Ian Goodman) on behalf of Oil Change International (OCI), incorporated as Attachment 3 to Comments filed by NRDC, Sierra Club and OCI before The Pipeline and Hazardous Materials Safety Administration, U.S. Department Of Transportation as part of the Advance Notice of Proposed Rulemaking Hazardous Materials: Rail Petitions and Recommendations To Improve the Safety of Railroad Tank Car Transportation, *December 5, 2013*.

Comments on Initial Study/Mitigated Negative Declaration (IS/MND) Valero Crude by Rail Project, Use Permit Application 12PLN-00063, Benicia, California, *July 1, 2013* (co-author with Ian Goodman) on behalf of NRDC, included as an attachment to NRDC's Comments on Notice of Intent to Adopt a Mitigated Negative Declaration for the Valero Crude by Rail Project, filed with the City of

Benicia Community Development Department on *July 1, 2013*.

Report evaluating the adequacy of the Keystone XL (KXL) Draft Supplemental Environmental Impact Statement (DSEIS) Market Analysis, *April 22, 2013* (co-author with Ian Goodman), filed as an attachment to the Comments on KXL DSEIS jointly submitted by the Sierra Club, NRDC, and 14 other environmental and public interest organizations.

Pipe Dreams? Jobs Gained, Jobs Lost by the Construction of Keystone XL, *September 28, 2011* (co-author with Ian Goodman, TGG, and L. Skinner and S. Sweeney, Cornell Global Labor Institute; *revised January 18, 2012*).

Employment Impacts of Air-Pollution Controls at North Dakota Coal Plants, prepared for Sierra Club, *November 21, 2011* (co-author with Ian Goodman).

The Economics of Supplier Diversity Examining Areas of Potential Interest for GLI with respect to GRC 2011 and Potential Amendments to GO 156, prepared for The Greenlining Institute, *August 6, 2010* (co-author with Ian Goodman).

Expert Testimony and Formal Energy Analyst Submissions

Information is presented in the following order: jurisdiction and docket number; title of case; client; date testimony filed; and subject matter covered.

- 1. State of Washington Energy Facility Site Evaluation Council (Case No. 15-001); Application No. 2013-01 Tesoro Savage LLC Vancouver Energy Distribution Terminal; Earthjustice; May 13, 2016 (Direct Testimony of I. Goodman with in-depth participation of B. Rowan); Technical Appendix: Market Analysis; May 13, 2016 (co-author with I. Goodman).**

Evaluation of the economic need for Washington State of the Vancouver Energy Distribution Terminal (VEDT). Demonstrated that the VEDT will do little if anything to supply Washington with energy. Consequently, concluded that there is no economic need for this Project to supply Washington. Analysis of whether the Project is in the public interest of Washington State. TGG's cross-jurisdictional study of the costs and benefits of energy logistics facilities for host jurisdictions consistently concludes the following: the benefits are relatively small; the cost/risks are relatively large; and the economic benefits and costs/risks tend to be unevenly distributed (across stakeholders and regions), with the project proponents getting the majority of the benefits and the hosting jurisdiction bearing the majority of the costs/risks. Recommendation that the Project be rejected based on the conclusion that it is highly likely that the VEDT is not in the public interest of Washington.

- 2. South Dakota Public Utilities Commission (Docket HP14-001); Petition of TransCanada Keystone Pipeline, LP (Keystone) for Order Accepting Certification of Permit Issued in Docket HP09-001 to Construct the Keystone XL Pipeline; The Rosebud Sioux Tribe; April 24, 2015; Rebuttal Testimony June 26, 2015 (joint testimony with I. Goodman). Testimony withdrawn July 17, 2015.**

Analysis of the changes to the economic costs and benefits of the Keystone XL Pipeline for South Dakota. Based on the conclusions of pipeline safety expert, Richard Kuprewicz, evaluation of a range of Worst-Case Scenario Costs starting at US\$1 billion and escalating to \$2 billion or more for a very high consequence event. Given the Keystone XL's very small employment and property tax benefits, concluded that, under a range of worst-case scenarios, the costs of the Project will greatly exceed the benefits for South Dakota.

- 3. Assemblée Nationale du Québec Commission de l'agriculture des pêcheries, de l'énergie de des ressources naturelles (Quebec Parliamentary Commssion); Parliamentary Hearings to study the acceptability for Quebec of Enbridge Pipelines Inc. proposed project to reverse the flow of Line 9B between North Westover and Montreal; Équiterre; December 3, 2013 (joint testimony with S. Guilbeault and S. Ribaux).**

Provided [oral testimony](#) before the Quebec Parliament on the acceptability for Quebec of Enbridge Pipelines Inc. Line 9B Reversal and Line 9 Capacity Expansion Project Proposal before the Canadian National Energy Board (Hearing Order OH-002-2013). Answered parliamentarians' technical questions on the need for hydrostatic testing at an appropriate pressure and identified the key threats to pipeline safety. Explained to the Commission why international pipeline safety expert Richard Kuprewicz had assessed the risk of rupture on Line 9B at 90% in the years following the reversal.

- 4. Canadian National Energy Board Hearing Order OH-002-2013; Enbridge Pipelines Inc. Line 9B Reversal and Line 9 Capacity Expansion Project Application; Équiterre (Coalition); August 8, 2013 (joint testimony with I. Goodman).**

Analysis of relative economic costs and benefits of Enbridge's Line 9B Reversal and Line 9 Capacity Expansion Project. Evaluation of the Project, which would transport a mix of tar sands dilbit, Bakken, and conventional WCSB crudes through Ontario and Quebec, crossing major waterways and Canada's most populous urban areas, (including Toronto and Montreal). Recommendation that the Enbridge Project be rejected, based on (i) the results of this relative economic cost-benefit analysis, demonstrating that the potential economic costs could exceed (and, under a range of malfunction/accident conditions, greatly exceed) the potential economic benefits; (ii) the highly uneven allocation of costs and benefits among the stakeholders, and across regions; and (iii) the conclusion of international pipeline safety expert, Richard Kuprewicz, that there is a high risk of pipeline rupture in the early years following Project implementation due to a combination of cracking and corrosion.

- 5. Régie de l'énergie du Québec (Quebec Energy Board) File R-3693-2009 Phase 3; Société en commandite Gaz Métro (SCGM or Gaz Métro) Application for the Renewal of the Incentive Mechanism for the Improvement of the Performance of Gaz Métro; Option consommateurs; April 9, 2013 (joint comments with J.F. Wilson).**

Analysis of various scenarios outlined by the Régie de l'énergie du Québec regarding a proposed Incentive Mechanism for Gaz Métro's distribution rates from the perspective of regulatory efficiency, equity between the distributor and customers, as well as equity between rate

classes.

- 6. Régie de l'énergie du Québec (Quebec Energy Board) File R-3809-2009 Phase 2; Société en commandite Gaz Métro (SCGM or Gaz Métro) Application for the Approval of the Supply Plan and the Modification of the Conditions of Service and Tariff as of October 1st, 2012; Option consommateurs; March 20, 2013; Oral testimony April 30, 2013.**

Evaluation of the reasonableness of SCGM's Operating Costs (including 2013 increase in salaries and wages relative to the years under SCGM's Incentive Mechanism; total operating costs for 2013 relative to the years under SCGM's Incentive Mechanism; benchmarking of total operating costs for 2013 based on a comparison with three other Canadian gas distributors; and pension costs and a valuation of the pension plan and deficit). Review of the 2013 Revenue Forecast (including customer and volume forecast methodology for D1, an analysis of the historic forecasts). Evaluation of affiliate transactions (including recovery of costs from affiliates: Valener and ANR; use of standard labour rates; allocation of common costs). Analysis and recommendations regarding the following: an Interim Sharing Mechanism for underearnings and overearnings for 2013; a method to hold regulated customers harmless in the transfer of the debt from the Unregulated Activities to the Regulated Activities; and the application of a uniform rate increase in D1 and related concerns regarding SCGM's Rate Vision and Rate Strategy.

- 7. Régie de l'énergie du Québec (Quebec Energy Board) File R-3809-2009 Phase 1; Société en commandite Gaz Métro (SCGM or Gaz Métro) Application for the Approval of the Supply Plan and the Modification of the Conditions of Service and Tariff as of October 1st, 2012; Option consommateurs; October 1, 2012 (Phase 1a) and December 7, 2012 (Phase 1b); Oral testimony November 6, 2012 (Phase 1a) and March 12, 2013 (Phase 1b).**

Analysis and recommendations regarding the general acceptability of the overall Supply Plan in light of Option consommateur's interest in balancing security of supply with cost minimization; the multipoint supply proposal and the strategy for displacement of the supply structure from Empress to Dawn; and proposed rate modifications relative to interruptions (Phase 1a). Evaluation and recommendations concerning SCGM's proposed Gas Procurement Incentive Mechanism (GPIM), a "Performance Indicator for the Optimization of Supply Tools" (Phase 1b).

- 8. Régie de l'énergie du Québec (Quebec Energy Board) File R-3752-2011 Phase 2; Société en commandite Gaz Métro (SCGM or Gaz Métro) Application for the Modification of Rates and Service Conditions for the 2011/2012 Rate Year; Option consommateurs; July**

8, 2011 (Revised September 9, 2011); Oral testimony September 9, 2011.

Analysis of: (i) the profitable development of the residential market; (ii) cost allocation, the links between the costs and the rates; and SCGM's long-term vision for the rate strategy; (iii) the 2011/2012 rate strategy (including correction of the cross-subsidization of residential consumers).

Note: This list includes only formal submissions and expert testimony at major cases since 2011. A complete list of all testimony and formal submissions since 2004 is available upon request.