

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF MARYLAND**

Potomac Electric Power Company's Application  
for Adjustments to its Retail Rates for the  
Distribution of Electric Energy

CASE NO. 9820

DIRECT TESTIMONY

OF

MELISSA WHITED

ON BEHALF OF THE OFFICE OF PEOPLE'S COUNSEL

JANUARY 30, 2026

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Exhibit MW-1: Resume of Melissa Whited



1 design. I have been an invited speaker in numerous industry conferences,  
2 including as a panelist for the National Association of Regulatory Utility  
3 Commissioners ("NARUC") Subcommittee on Rate Design at the 2021 Winter  
4 Policy Summit, the NARUC 2018 Annual Meeting, and the National Association  
5 of State Utility Consumer Advocates ("NASUCA") Annual Meeting.

6 I have sponsored testimony before fifteen state public utility commissions, three  
7 Canadian utility commissions, and the Federal Energy Regulatory Commission. I  
8 hold a Master of Arts in Agricultural and Applied Economics and a Master of  
9 Science in Environment and Resources, both from the University of Wisconsin-  
10 Madison. My resume is attached as Exhibit MW-1.

11 **Q. On whose behalf are you testifying in this case?**

12 A. I am testifying on behalf of the Maryland Office of People's Counsel ("OPC").

13 **Q. What is the purpose of your testimony in this proceeding?**

14 A. My testimony evaluates the Potomac Electric Power Company's ("Pepco" or  
15 "company") class cost of service studies ("CCOSS"), cost allocation, and rate  
16 designs to ensure the company's proposals are in the public interest and consistent  
17 with Maryland's energy policy goals. My testimony summarizes my findings  
18 regarding Pepco's seasonality study and proposal to gradually eliminate seasonal  
19 rates.

1 **Q Have you testified previously before the Public Service Commission of**  
2 **Maryland or participated in any Commission-sponsored proceeding?**

3 A Yes. I testified before the Maryland Public Service Commission (“Commission”)  
4 in Case No. 9761 regarding the Maryland utilities’ time-of-use (TOU) filings in  
5 compliance with the 2024 Distribution Renewable Integrated and Vehicle  
6 Electrification (DRIVE) Act, Case No. 9670 regarding Delmarva Power and  
7 Light’s proposed rate designs, and Case No. 9655 regarding Pepco’s multi-year  
8 rate plan. I have also participated in the PC44 Rate Design Working Group on  
9 behalf of OPC since 2021.

10 **Q. What materials did you rely on to develop your testimony?**

11 A. The sources for my testimony and exhibits are public documents, the company’s  
12 application and workpapers, responses to discovery requests, and my personal  
13 knowledge and experience.

14 **Q. Was your testimony prepared by you or under your direction?**

15 A. Yes. My testimony was prepared by me or under my direct supervision and  
16 control.

17 **I. Summary of Conclusions and Recommendations**

18 **Q. Please summarize your main conclusions.**

19 A. My conclusions are as follows:

- 1           • Pepco has not demonstrated that eliminating seasonally differentiated  
2           residential distribution rates is justified on the basis of cost causation.
- 3           • Pepco's own seasonality study confirms that the company remains strongly  
4           summer-peaking and that a substantial share of distribution costs is driven  
5           by summer peak demand. The study's results indicate that summer  
6           volumetric rates should be significantly higher (55 percent to 99 percent)  
7           than winter rates—results that are broadly consistent with Pepco's existing  
8           seasonal differentials.
- 9           • Setting rates equal across seasons inherently allocates a greater share of the  
10          revenue requirement to the winter season than the summer season because  
11          billing determinants are lower during the summer. Thus, setting rates to be  
12          equal across seasons actually implies that the winter season is responsible  
13          for a greater share (approximately 57 percent) of costs than the summer.  
14          This is in direct contradiction to the results of Pepco's seasonality study. It  
15          is also inconsistent with an even allocation (50/50) of costs across seasons.
- 16          • Pepco's proposal to gradually eliminate seasonality would weaken cost-  
17          reflective price signals and reduce fairness for customers with higher winter  
18          electricity usage. It would also reduce incentives for beneficial

1           electrification, particularly the adoption of electric heat pumps, which are  
2           essential to achieving Maryland's climate and emissions-reduction goals.

- 3           • Removing seasonal differentiation is also inconsistent with Maryland's  
4           movement toward more dynamic and cost-reflective rates under advanced  
5           rate designs such as Schedule R-TOU-P, the TOU rate developed under the  
6           Residential Time-of-Use Pilot.

7   **Q.    Please summarize your recommendations.**

8   **A.    I recommend that the Commission:**

- 9           1. Reject Pepco's proposal to gradually eliminate seasonally differentiated  
10           residential distribution rates and instead require Pepco to retain its current  
11           levels of seasonal differentiation in Schedules R and R-TM.
- 12           2. Direct Pepco to redefine the summer season for Schedule R as June through  
13           September (rather than through October) to better align rates with underlying  
14           cost causation and peak demand drivers. This definition is also consistent with  
15           Schedule R-TOU-P.
- 16           3. Direct Pepco to update its seasonality analysis in future rate cases to reflect  
17           evolving load patterns and electrification trends, rather than presuming that  
18           seasonality will diminish over time.

1 Finally, if the Commission elects to reduce or eliminate seasonality in standard  
2 residential rates, I recommend that the Commission direct Pepco to develop  
3 alternative, opt-in rate designs that remain cost-reflective and supportive of heat  
4 pump adoption.

## 5 **II. Rate Design and Energy Policy Objectives**

6 **Q. What ratemaking principles should be considered when designing rates?**

7 A. Rate design must balance numerous objectives, some of which may conflict with  
8 one another. In his seminal work, *Principles of Public Utility Rates*, Professor  
9 James Bonbright identified ten guiding principles for rate design. These principles  
10 can be summarized as follows:

- 11 1. Sufficiency: Rates should generate revenues adequate to recover the  
12 utility's costs.
- 13 2. Fairness: Rates should allocate costs equitably among customer classes  
14 and avoid undue discrimination in rate relationships.
- 15 3. Efficiency: Rates should provide economically efficient price signals  
16 and discourage wasteful consumption.
- 17 4. Customer acceptability: Rates should be relatively stable, predictable,  
18 simple, and easily understandable.

1 In addition, Public Utilities Article § 2-113(a)(2) requires the Commission  
2 to consider the impacts of public service companies on the achievement of  
3 the State’s climate commitments. Under Maryland’s *Climate Solutions Now*  
4 *Act of 2022*, Maryland adopted the goal of achieving a 60% reduction in  
5 statewide greenhouse gas (“GHG”) emissions from 2006 levels by 2031.<sup>1</sup>

6 **Q. What is the role of rate design in meeting Maryland’s energy policy goals?**

7 A. Rate design can influence customer electricity usage in several important ways  
8 that support state policy objectives. Specifically:

- 9 1. Rate design can help reduce GHG emissions by encouraging the adoption  
10 of beneficial electrification technologies, such as heat pumps; and
- 11 2. Rate design can promote more efficient use of the electric grid, helping to  
12 reduce both system costs and emissions associated with electricity  
13 consumption.

14 **Q. Please explain how rate design can promote beneficial electrification.**

15 A. To achieve a 60 percent reduction in statewide GHG emissions, Maryland must  
16 both reduce total energy consumption—through programs such as EmPOWER—  
17 and transition from fossil-fuel-based technologies to cleaner electric alternatives.  
18 However, many electric technologies, such as heat pumps, involve higher up-front

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<sup>1</sup> S.B. 528, 2022 Leg., Reg. Sess. (Md. 2020).

1 costs. To overcome these adoption barriers, it is essential that customers realize  
2 operational savings over time relative to fossil fuel options. Thoughtful rate design  
3 can help deliver these savings, thereby accelerating the adoption of beneficial  
4 electrification technologies. In particular, seasonal rates can help lower the cost of  
5 heat pump adoption, since these customers tend to have higher-than-average  
6 electricity consumption during the winter months when Pepco's system load is  
7 lower due to cooler weather.

### 8 **III. Pepco's Residential Rate Proposal**

9 **Q. Please describe Pepco's residential rate proposal.**

10 A. Pepco is proposing three primary changes to residential rates, summarized as  
11 follows:

- 12 • Gradual elimination of seasonally-differentiated volumetric distribution  
13 rates;<sup>2</sup>
- 14 • Consolidation of Schedules R and R-TM into a single class with respect  
15 to bill stabilization adjustment (BSA) monthly targets;<sup>3</sup> and

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<sup>2</sup> Direct Testimony of Peter Blazunas at 31 ("Blazunas Direct").

<sup>3</sup> Blazunas Direct at 32.

- 1           • Adjustments to the residential customer charge that would raise the  
2           Schedule R charge to \$8.67/month (a 2.7 percent increase) and reduce  
3           the Schedule R-TM customer charge to \$15.90/month (an 11.6 percent  
4           decrease).<sup>4</sup>

5 **Q. Do you have any concerns regarding Pepco's residential rate design**  
6 **proposals?**

7 A. Yes. My primary concern relates to Pepco's proposal to gradually eliminate  
8           seasonally-differentiated volumetric distribution rates. This change would reduce  
9           the cost-reflectivity of the rates and weaken the economic incentives for customers  
10          to adopt heat pumps—an important technology for achieving Maryland's energy  
11          and climate goals.

12 **IV. Elimination of Seasonality is Unjustified and Would Undermine Rate Design**  
13 **Principals**

14 **Q. Why is Pepco proposing to gradually eliminate seasonality in rates?**

15 A. Pepco Witness Blazunas offers several reasons for this proposal:<sup>5</sup>

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<sup>4</sup> Blazunas Direct, Schedule PRB-5 at 2.

<sup>5</sup> Blazunas Direct at 33-34.

- 1           • The proposal complies with the Commission's directive in Order No.  
2           91181 in Case No. 9702 to include a proposal to gradually eliminate the  
3           seasonally differentiated rate structure in the next rate case.
- 4           • The current seasonal rate differentials are not aligned with underlying cost  
5           differences and are remnants of rate structures developed prior to  
6           unbundling.
- 7           • The company believes removing seasonality would improve customer  
8           experience by providing more predictable rates.
- 9           • Removal of seasonality would bring the rates more in line with other rate  
10          schedules and rates of its sister utilities.

11 **Q. Why did the Commission direct Pepco to include a proposal to gradually**  
12 **eliminate seasonality in rates?**

13 A. In Case No. 9702, Pepco proposed to gradually eliminate seasonally differentiated  
14 rates for similar reasons to those it provides here.<sup>6</sup> However, OPC opposed the  
15 elimination of seasonality because Pepco did not demonstrate that removing  
16 seasonality was justified based on cost causation. In its Order, the Commission  
17 approved the continuation of seasonal rates, while also directing Pepco to include  
18 a proposal to gradually eliminate seasonality as well as a cost analysis of

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<sup>6</sup> Pepco, Direct Testimony of Peter Blazunas at 40, ML# 302977 (Case No. 9702, May 16, 2023).

1 seasonality in its next rate case filing. While the Commission indicated its intent to  
2 eliminate seasonality in the future,<sup>7</sup> it need not do so if the elimination of  
3 seasonality is not justified based on cost causation.

4 **Q. Did Pepco conduct a cost analysis of seasonality?**

5 A. Yes. Pepco Witness Schafer provided the seasonality study in Schedule (LCS)-18.

6 To conduct the study, the company first analyzed system and class load data for  
7 2022–2024 to identify seasonal peak patterns and found that both the system and  
8 the Residential class peak during the summer months.<sup>8</sup> On average, system  
9 summer peak demand exceeded the winter peak by approximately 24 percent from  
10 2022-2024.<sup>9</sup>

11 Pepco then modified its previously filed Class Cost of Service Study by applying  
12 this seasonal peak demand ratio to demand-related distribution plant and expense  
13 accounts allocated using non-coincident peak demand. The company then  
14 compared the resulting “winter” revenue requirement to the original, full-cost  
15 revenue requirement.

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<sup>7</sup> Md. Pub. Serv. Comm’n, Order No. 91181 at 190-91 (Case No. 9702, June 10, 2024).

<sup>8</sup> Direct Testimony of Lance Schafer at 28, (“Schafer Direct”).

<sup>9</sup> This is equivalent to a winter-to-summer ratio of approximately 0.81.

1 **Q. What were the results of Pepco's seasonality study?**

2 A. Because summer peak loads are considerably higher than winter peak loads,  
3 Pepco's seasonality study results in greater costs allocated to the summer season  
4 than the winter season. Pepco reports that for the Residential class (excluding R-  
5 TM), the non-seasonally differentiated revenue requirement is 1.09 times that of  
6 the "winter" revenue requirement, while it is 1.20 for R-TM.<sup>10</sup> Because Pepco  
7 only compares the winter revenue requirement to the non-seasonally-differentiated  
8 revenue requirement, the ratios reported are half as large than if Pepco had  
9 compared the "winter" revenue requirement to the "summer" revenue requirement.  
10 In other words, if the residential revenue requirement were allocated across  
11 seasons according to this ratio, 54 percent of costs would be assigned to the  
12 summer season and 46 percent to the winter season, for a ratio of 1.18.<sup>11</sup>

13 **Q. Does Pepco's seasonality study indicate that residential rates should be**  
14 **approximately 18 percent higher in the summer than in the winter?**

15 A. No. These results cannot be directly applied to residential rates because rates must  
16 be derived by dividing costs by sales. Under Pepco's seasonal definitions, and  
17 using fully forecasted test year ("FFTY") billing determinants, summer sales  
18 (June–October) account for only about 43 percent of annual kilowatt-hour usage,<sup>12</sup>

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<sup>10</sup> Schafer Direct at 28-30.

<sup>11</sup>  $0.5413 \text{ divided by } 0.4587 = 1.18$

<sup>12</sup> If TTYCF billing determinants are used, this falls slightly to 42 percent and winter billing determinants rise slightly to 58 percent.

1 while winter sales (November–May) account for 57 percent.<sup>13</sup> Lower summer  
2 sales combined with higher seasonal costs imply that summer volumetric rates  
3 should be approximately 55 percent higher than winter rates using FPTY billing  
4 determinants.<sup>14</sup> If traditional test year compliance filing (“TTYCF”) billing  
5 determinants are used instead, summer volumetric rates should be approximately  
6 59 percent higher than winter rates.

7 **Q. If seasonality were removed from Schedule R rates, does this imply that costs**  
8 **would be allocated equally across seasons (i.e., 50% to summer and 50% to**  
9 **winter)?**

10 A. No. Because billing determinants are lower during the summer, setting equal rates  
11 across seasons would result in only about 43 percent of annual revenues being  
12 collected in the summer and approximately 57 percent in the winter. In other  
13 words, eliminating seasonal rate differentials does not produce an equal allocation  
14 of costs across seasons; instead, it shifts a greater share of revenues to the winter  
15 period, directly contradicting the results of the seasonality study.

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<sup>13</sup> Blazunas Direct, Schedule (PRB)-7 at 1.

<sup>14</sup> The summer percentage of revenue requirement (54%) divided by the summer percentage of sales (43%) is 1.25, while the winter percentage of revenue requirement (46%) divided by the winter percentage of sales (57%) is 0.81. Dividing the summer value (1.25) by the winter value (0.81) yields a summer to winter ratio of 1.55 to 1.

1 **Q. Do Pepco's definitions of "winter" and "summer" seasons accurately reflect**  
2 **customer usage patterns?**

3 A. No. To allocate costs across seasons accurately, the seasons should be defined  
4 according to similarities in usage characteristics as much as possible so that costs  
5 associated with meeting peak demand are allocated to the months in which  
6 demand is likely to be highest. Currently, Pepco's summer season inappropriately  
7 includes October, despite it typically having the lowest demand of the year.  
8 October should instead be reclassified as "winter" to better align rates with cost  
9 causation and load characteristics.

10 **Q. Do all of Pepco's rate schedules include October in the summer season?**

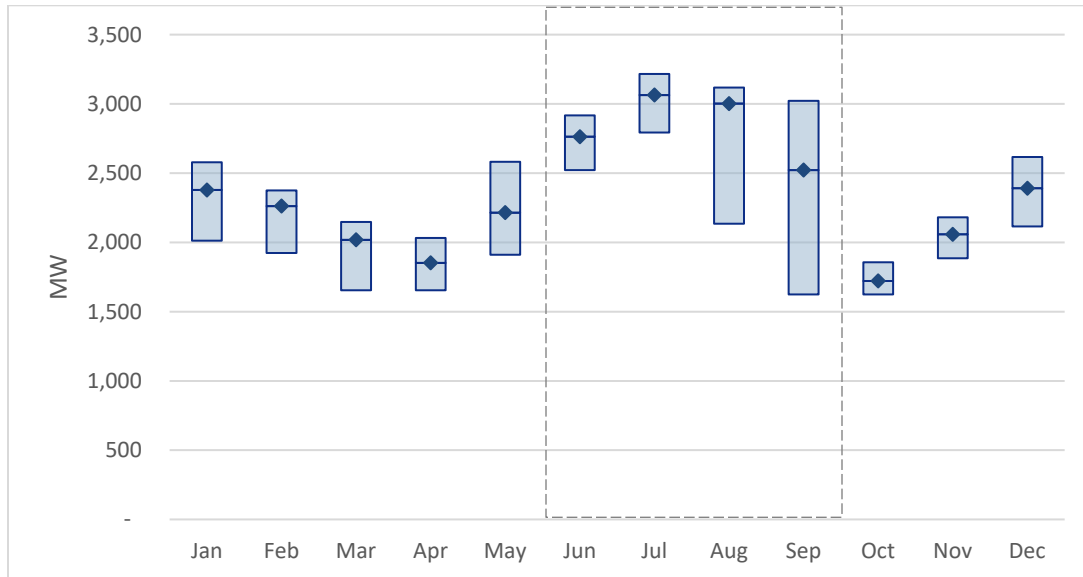
11 A. No. Schedule R-TOU-P includes October in the winter season. In addition,  
12 Pepco's standard offer service ("SOS") rates categorize October as a winter  
13 month.

14 **Q. How did you determine that October is inappropriately included in the**  
15 **"summer" season?**

16 A. I analyzed monthly system peak load over the period 2022-2024 and found that  
17 peak demands in June through September were, on average, about 65 percent  
18 higher than those in October. Figure 1 below displays the range and average of  
19 monthly peaks during this period, with my proposed redefinition of summer  
20 highlighted. The bars in each month represent the range of peak load over the  
21 period 2022-2024, while the diamond represents the month's average peak  
22 demand over the same period. The data clearly show that October should not be

1 grouped with the summer months of June through September due to significantly  
2 lower levels of demand.

3 **Figure 1. Average and range of monthly peaks 2022-2024 with proposed**  
4 **redefinition of “summer” season**



5

6 **Q. What practical implication does redefining the summer season have on rate**  
7 **design?**

8 A. Limiting the summer season to June through September concentrates costs in the  
9 months most responsible for driving peak-related investment. Removing October  
10 from the summer period also excludes its billing determinants from rate  
11 calculations, thereby strengthening the efficiency of the summer price signal.

12 Under this redefinition, summer kilowatt-hour sales would represent about 37  
13 percent of annual usage using FTY billing determinants, while the revenue  
14 allocation remains at 54 percent, implying a summer rate approximately 99  
15 percent higher than the winter rate. If instead TTYCF billing determinants are

1 used, summer kilowatt-hour sales would represent about 36 percent of annual  
2 usage, implying a summer rate approximately 107 percent higher than the winter  
3 rate. In other words, classifying October as a winter month results in seasonal rates  
4 that are approximately twice as high in the summer months as the winter months.

5 **Q. Is it important to ensure that rates reflect these underlying differences in cost**  
6 **causation across seasons?**

7 A. Yes. Cost-reflective rates send more accurate price signals to customers and  
8 enhance fairness in rate design. Because Pepco is a summer-peaking utility,  
9 retaining seasonal differentials also helps support the adoption of heat pumps,  
10 which are critical to meeting Maryland's climate commitments. For example, if  
11 Pepco eliminated seasonality completely, its Schedule R winter rates under either  
12 the FFTY or the TTYCF would be approximately \$0.023/kWh higher than if the  
13 company maintains current levels of seasonal differentiation, with a winter rate of  
14 \$0.05/kWh.<sup>15</sup> If a heat pump consumes an average of 2,000 kWh per month in the  
15 winter, eliminating seasonality would increase a heat pump customer's monthly  
16 bill by more than \$45 during the winter months. For many customers, the decision  
17 to install a heat pump turns on whether the monthly bill savings are large enough  
18 to justify the up-front cost; raising winter rates reduces those savings (or turns  
19 them into added cost), lengthens payback, and makes heat pumps a harder sell

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<sup>15</sup> Pepco Voluntary DR 1-6 Attachment A, FFTY Rate Design Schedule R and TTYCF Rate Design Schedule R.

1 compared to gas heating. To offset the impact of higher operating costs, the  
2 EmPOWER program may need to provide higher up-front heat pump incentives,  
3 increasing costs for all ratepayers and reducing the overall cost-effectiveness of  
4 heat-pump deployment.

5 Additionally, Pepco’s R-TOU-P rate features a pronounced seasonal component,  
6 with summer prices substantially higher than winter prices (as shown in Table 1,  
7 below). Retaining seasonal differentiation in Schedule R will help familiarize  
8 customers with this concept, making the transition to more advanced, seasonally  
9 based rates like R-TOU-P less daunting.

10 **Table 1. Schedule R-TOU-P Volumetric Rates**

	<b>Summer (\$/kWh)</b>	<b>Winter (\$/kWh)</b>
<b>On-Peak</b>	<b>0.20359</b>	<b>0.09350</b>
<b>Off-Peak</b>	<b>0.05821</b>	<b>0.02876</b>

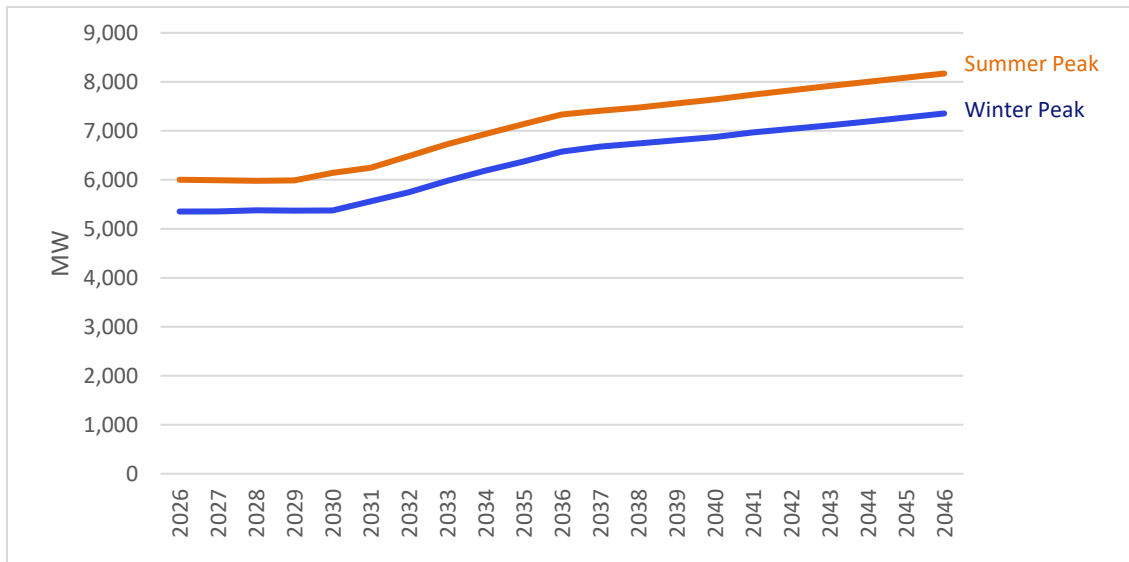
11  
12 **Q. Pepco is currently a summer-peaking utility. Is it likely to become winter-**  
13 **peaking in the near future?**

14 **A.** No. PJM’s latest Long-Term Load Forecast projects that the PEPCO Zone will  
15 remain summer-peaking through 2046, as shown in the figure below.<sup>16</sup>

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<sup>16</sup> PJM, Long-Term Load Forecast Data table (Jan. 14, 2026) (available at: <https://www.pjm.com/-/media/DotCom/library/reports-notice/load-forecast/2026-load-report-data.xlsx>).

1 **Figure 2. PEPCO Zone forecasted peak demand**



2

3

*Source: PJM 2026 Long-Term Load Forecast.*

4 **Q. What do you recommend regarding seasonality in rates?**

5 A. I recommend that the Commission maintain seasonally differentiated residential  
6 distribution rates at current levels for the following reasons:

- 7
- 8 • Pepco's own seasonality study indicates that summer rates should be 55  
9 percent higher than winter rates, under current season definitions. If  
10 October is classified as a winter month, Pepco's seasonality study would  
11 indicate that summer rates should be 99 percent higher than winter rates.  
12 Pepco's existing summer rates are about 102 percent higher than winter  
rates,<sup>17</sup> which aligns well with the study's results when October is treated

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<sup>17</sup> The Schedule R volumetric rate is currently \$0.8760/kWh in summer and \$0.04328/kWh in winter.

1 as a winter month. Accordingly, maintaining seasonal differentiation and  
2 classifying October as a winter month is consistent with, and directly  
3 supported by, Pepco's own seasonality study.

- 4 • Aligning rate structures with actual seasonal cost causation supports  
5 Maryland's climate and electrification objectives by improving the relative  
6 economics of electric heat pumps.
- 7 • Removing seasonality would reduce the accuracy of price signals to  
8 customers and undermine fairness, particularly for customers who consume  
9 more electricity during the winter months than in the summer.

10 For these reasons, I recommend that the Commission require Pepco to retain  
11 seasonal differentiation based on a June–September summer definition and direct  
12 the company to update its seasonality study in future cases to reflect evolving load  
13 patterns and electrification impacts.

14 **Q. If the Commission declines to retain seasonal differentiation in rates, what**  
15 **other rate design options could help support the achievement of Maryland's**  
16 **energy policy goals?**

17 A. If the Commission declines to eliminate seasonality in Schedule R and R-TM, I  
18 recommend that it direct Pepco to develop one or more alternative opt-in rates that  
19 are cost-reflective and supportive of heat pump electrification. For example, tariffs  
20 with lower volumetric charges can encourage beneficial electrification because

1 customers who adopt technologies such as EVs and heat pumps will typically  
2 increase their electricity consumption substantially. Volumetric rates can be  
3 reduced by increasing the fixed charge.

4 I note that tariffs with high fixed charges should be implemented carefully, as  
5 higher fixed charges reduce customer incentives to adopt energy efficiency  
6 measures. In addition, low-income customers tend to have lower-than average  
7 usage and could be harmed by such a tariff. Thus, tariffs with higher fixed charges  
8 should be limited to customers who have invested in beneficial electrification  
9 technologies, rather than implemented as a standard tariff.

10 **Q. Do you have any other concerns with Pepco's rate design proposals?**

11 A. Yes. While I appreciate Pepco's efforts to facilitate future re-design of Schedule  
12 R-TM through the changes proposed in this rate case, I believe the company  
13 should do more to holistically evaluate the effectiveness of its rate schedules and  
14 riders intended to reduce peak demand. In particular, I recommend that Pepco  
15 conduct a comprehensive assessment of the load-reduction potential and cost-  
16 effectiveness of its Time-of-Use ("TOU") rates, Peak Energy Savings Credit  
17 program ("Rider DP"), Residential Direct Load Control program ("Rider DLC"),  
18 and electric vehicle rates.

1 **Q. Why do you recommend that Pepco conduct a comprehensive evaluation of**  
2 **its peak load reduction programs and tariffs?**

3 A. My understanding is that the demand-reduction potential and cost-effectiveness of  
4 these programs vary significantly, and that some programs—such as the Peak  
5 Energy Savings Credit—are underutilized despite relatively high enrollment. A  
6 comprehensive evaluation would allow Pepco to better target its efforts and deploy  
7 ratepayer funds more efficiently across these offerings in order to achieve the  
8 greatest peak load reduction at the lowest reasonable cost.

9 **Q. Does this conclude your direct testimony?**

10 A. Yes, it does.

**Melissa Whited, Vice President, Consulting**

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**PROFESSIONAL EXPERIENCE**

**Synapse Energy Economics**, Cambridge MA. *Vice President*, April 2023 – Present; *Senior Principal*, May 2022 – April 2023, *Principal Associate*, 2017 – May 2022, *Senior Associate*, 2015 – 2017, *Associate*, 2012 – 2015

Consult and provide analysis of rate design proposals, alternative regulation, and other topics including distributed energy resources and electric vehicles. Develop expert witness testimony in public utility commission proceedings. Author reports on topics at the intersection of utility regulation, customer protection, and environmental impacts.

**University of Wisconsin - Madison**, Department of Agricultural and Applied Economics, Madison, WI. *Teaching Assistant – Environmental Economics*, 2011 – 2012

Developed teaching materials and led discussions on cost-benefit analysis, carbon taxes and cap-and-trade programs, management of renewable and non-renewable resources, and other topics.

**Public Service Commission of Wisconsin, Water Division**, Madison, WI. *Program and Policy Analyst - Intern*, Summer 2009

Researched water conservation programs nationwide to develop a proposal for Wisconsin's state conservation program. Developed spreadsheet model to calculate avoided costs of water conservation in terms of energy savings and avoided emissions.

**Synapse Energy Economics**, Cambridge, MA. *Communications Manager*, 2005 – 2008

Developed technical proposals for state and federal agencies, environmental and public interest groups, and businesses. Edited reports on energy efficiency, integrated resource planning, greenhouse gas regulations, renewable resources, and other topics.

**EDUCATION**

**University of Wisconsin**, Madison, WI  
Master of Arts in Agricultural and Applied Economics, 2012  
Certificate in Energy Analysis and Policy  
National Science Foundation Fellow

**University of Wisconsin**, Madison, WI  
Master of Science in Environment and Resources, 2010  
Certificate in Humans and the Global Environment  
Nelson Distinguished Fellowship

**Southwestern University**, Georgetown, TX

Bachelor of Arts in International Studies, *Magna cum laude*, 2003.

## **ADDITIONAL SKILLS**

- Econometric Modeling – Linear and nonlinear modeling including time-series, panel data, logit, probit, and discrete choice regression analysis
- Nonmarket Valuation Methods for Environmental Goods – Hedonic valuation, travel cost method, and contingent valuation
- Cost-Benefit Analysis
- Input-Output Modeling for Regional Economic Analysis

## **FELLOWSHIPS AND AWARDS**

- Winner, M. Jarvin Emerson Student Paper Competition, Journal of Regional Analysis and Policy, 2010
- Fellowship, National Science Foundation Integrative Graduate Education and Research Traineeship (IGERT), University of Wisconsin – Madison, 2009
- Nelson Distinguished Fellowship, University of Wisconsin – Madison, 2008

## **PUBLICATIONS**

Havumaki, B., A. Fuzaylov, M. Whited. 2025. *Optimizing Incentives for Effective PIMs: Coordinating PIMs with authorized ROE for Efficient and Effective Regulation*. Synapse Energy Economics for Clean Virginia.

Shenstone-Harris, S., M. Whited, K. Takahashi, S. Schadler, A. Fuzaylov, I. Weiss. 2025. *How Will Future Electric Vehicle Adoption and Building Electrification Affect Electric Rates?* New Jersey Factsheet. Synapse Energy Economics for Natural Resources Defense Council.

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## TESTIMONY AND COMMENTS

**Indiana Utility Regulatory Commission (Cause No. 46120):** Direct Testimony of Melissa Whited addressing the appropriate return on equity for Northern Indiana Public Service Company in light of its high rates and recent dismal performance related to customer satisfaction and reliability. On behalf of La Porte County Board of Commissioners. December 19, 2024.

**Colorado Public Utilities Commission (Proceeding No. 24AL-0275E):** Answer Testimony of Melissa Whited regarding the design of electrification rates in the Matter of Black Hills Energy to increase base rates for residential and small commercial customer classes. On behalf of Sierra Club and Western Resource Advocates. October 11, 2024.

**New York Public Service Commission (Cases 24-E-0322 and 24-G-0323):** Direct Testimony of Melissa Whited, Caroline Palmer, and Ben Havumaki addressing the cost of service study and revenue allocation proposals submitted by Niagara Mohawk Power Corporation (National Grid).

**Nova Scotia Utility and Review Board (Matter No. M11621):** Direct Testimony of Melissa Whited in the Matter of the Public Utilities Act and In the Matter of a review of Nova Scotia Power Incorporated's Final Report for the Smart Grid Nova Scotia Project. On behalf of Counsel to Nova Scotia Utility and Review Board. May 28, 2024.

**Massachusetts Department of Public Utilities (Docket No. 23-150):** Direct testimony of Melissa Whited regarding National Grid's electrification pricing proposal, performance incentive mechanisms, and Infrastructure, Safety, Reliability & Electrification cost recovery mechanism. On behalf of the Massachusetts Department of Energy Resources. March 29, 2024.

**Nova Scotia Utility and Review Board (Matter No. M10832):** Direct Testimony of Melissa Whited regarding the Town of Mahone Bay Electric Utility's application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. January 11, 2023.

**Nova Scotia Utility and Review Board (Matter No. M10810):** Direct Testimony of Melissa Whited regarding Riverport Electric Light Commission's application for approval of amendments to its schedule of rates and charges for the provision of electric supply and services to its customers and its schedule of rules and regulations. On behalf of Counsel to Nova Scotia Utility and Review Board. December 23, 2022.

**Public Utilities Commission of Maine (Docket No. 2022-00152):** Direct Testimony of Melissa Whited and Eric Borden regarding Central Maine Power Company's request for rate design increase and changes. On behalf of the Maine Office of the Public Advocate. December 2, 2022.

**Massachusetts Department of Public Utilities (Docket No. 21-91):** Direct testimony of Melissa Whited regarding National Grid's demand charge alternative proposal, and its implications for the adoption of electric vehicles. On behalf of the Natural Resources Defense Council, Union of Concerned Scientists, and Sierra Club. May 27, 2022.

**Illinois Commerce Commission (Docket No. 22-0067):** Direct Testimony of Melissa Whited and Ben Havumaki regarding the performance incentive mechanisms and tracking metrics proposed by Commonwealth Edison Company and Ameren Illinois Company. April 6, 2022.

**Maryland Public Service Commission (Case No. 9670):** Direct testimony of Melissa Whited regarding Delmarva Power and Light's proposed rate designs. On behalf of Maryland Office of People's Counsel. December 2, 2021.

**New Hampshire Public Utilities Commission (Docket DE 21-030):** Direct Testimony of Melissa Whited and Ben Havumaki regarding Unitil's proposed rate increase for the residential class, multi-year rate plan, revenue decoupling mechanism, and grid modernization investments. On behalf of the New Hampshire Office of the Consumer Advocate. November 23, 2021.

**Nova Scotia Utility and Review Board (Matter No. M10176):** Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.'s proposed Smart Grid Nova Scotia Solar Garden Rider. On behalf of Counsel to the Nova Scotia Utility and Review Board. August 18, 2021.

**Public Service Commission of Florida (Docket No. 20210015-EI):** Direct Testimony of Melissa Whited regarding Florida Power and Light's petition for rate increase. On behalf of Vote Solar. June 21, 2021.

**Colorado Public Utilities Commission (Proceeding No. 20AL-0432E):** Answer testimony of Melissa Whited regarding inclining block rates. On behalf of Energy Outreach Colorado. March 8, 2021.

**Maryland Public Service Commission (Case No. 9655):** Direct and surrebuttal testimony of Melissa Whited regarding Pepco's proposed multi-year plan and performance incentive mechanisms. On behalf of Maryland Office of People's Counsel. March 3, 2021.

**Nova Scotia Utility and Review Board (Matter No. M09777):** Direct testimony of Melissa Whited regarding Nova Scotia Power Inc.'s proposed time-varying pricing tariff application. On behalf of Counsel to the Nova Scotia Utility and Review Board. February 24, 2021.

**Newfoundland and Labrador Board of Commissioners of Public Utilities (Reference to the Board Rate Mitigation Options and Impacts of the Muskrat Falls Project):** *Phase 2 Report on Muskrat Falls Project Rate Mitigation*. Expert Report. Prepared for the Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador. September 3, 2019.

**Georgia Public Service Commission (Docket No. 42516):** Direct testimony of Melissa Whited and Ben Havumaki regarding Georgia Power's proposal to increase the customer charge for residential customers. On behalf of the Sierra Club. October 17, 2019.

**Maine Public Utilities Commission (Docket No. 2018-00171):** Direct testimony of Melissa Whited regarding utility incentives for non-wires alternatives. On behalf of Maine Office of the Public Advocate. December 17, 2018.

**Rhode Island Public Utilities Commission (Docket No. 4780):** Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Power Sector Transformation proposals. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 28, 2018.

**Rhode Island Public Utilities Commission (Docket No. 4770):** Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's proposed performance incentive mechanisms, benefit-cost analyses, and request for recovery of costs for its Advanced Metering Functionality study and distributed energy resources enablement investments. On behalf of the Rhode Island Division of Public Utilities and Carriers. April 6, 2018.

**Rhode Island Public Utilities Commission (Docket No. 4783):** Direct testimony of Tim Woolf and Melissa Whited regarding National Grid's Advanced Metering Functionality Pilot. On behalf of the Rhode Island Division of Public Utilities and Carriers. February 22, 2018.

**Virginia State Corporation Commission (Case No. PUR-2017-00044):** Direct testimony of Melissa Whited regarding Rappahannock Electric Cooperative's proposed increases to fixed charges for residential customers and small business customers. On behalf of Sierra Club. September 19, 2017.

**California Public Utilities Commission (Application 17-01-020, 17-01-021, and 17-01-022):** Joint opening testimony with Max Baumhefner and Katherine Stainken on fast charging infrastructure and rates; joint opening testimony with Max Baumhefner and Joel Espino on medium and heavy-duty and fleet charging infrastructure and commercial EV rates; joint opening testimony with Max Baumhefner and Chris King

on residential charging infrastructure and rates. Rebuttal testimony on public fast charging rate design, commercial EV rate design, and residential EV rate design. On behalf of Natural Resources Defense Council, the Greenlining Institute, Plug In America, the Coalition of California Utility Employees, Sierra Club, and the Environmental Defense Fund. July 25, August 1, August 7, and September 5, 2017.

**New York Public Service Commission (Case 17-E-0238):** Direct and rebuttal testimony of Tim Woolf and Melissa Whited regarding Earnings Adjustment Mechanisms proposed by National Grid. On behalf of Advanced Energy Economy Institute. August 25 and September 15, 2017.

**Utah Public Service Commission (Docket No. 14-035-114):** Direct testimony of Melissa Whited regarding PacifiCorp's proposed rates for customers with distributed generation. On behalf of Utah Clean Energy. June 8, 2017.

**Texas Public Utilities Commission (SOAH Docket No. 473-17-1764, PUC Docket No. 46449):** Cross-rebuttal testimony evaluating Southwestern Electric Power Company's proposed revisions to its Distributed Renewable Generation tariff. On behalf of Sierra Club and Dr. Lawrence Brough. May 19, 2017.

**Massachusetts Department of Public Utilities (Docket No. 17-05):** Direct and surrebuttal testimony of Tim Woolf and Melissa Whited regarding performance-based regulation, the monthly minimum reliability contribution, storage pilots, and rate design in Eversource's petition for approval of rate increases and a performance-based ratemaking mechanism. On behalf of Sunrun and the Energy Freedom Coalition of America, LLC. April 28, 2017 and May 26, 2017.

**Public Utilities Commission of Hawaii (Docket No. 2015-0170):** Direct testimony regarding Hawaiian Electric Light Company's proposed performance incentive mechanisms. On behalf of the Division of Consumer Advocacy. April 28, 2017.

**Massachusetts Department of Public Utilities (Docket No. 15-155):** Joint direct and rebuttal testimony with T. Woolf regarding National Grid's rate design proposal. On behalf of Energy Freedom Coalition of America, LLC. March 18, 2016 and April 28, 2016.

**Federal Energy Regulatory Commission (Docket No. EC13-93-000):** Affidavit regarding potential market power resulting from the acquisition of Ameren generation by Dynegy. On behalf of Sierra Club. August 16, 2013.

**Wisconsin Senate Committee on Clean Energy:** Joint testimony with M. Grabow regarding the importance of clean transportation to Wisconsin's public health and economy. February 2010.

## TESTIMONY ASSISTANCE

**Colorado Public Utilities Commission (Proceeding No. 16AL-0048E):** Answer testimony of Tim Woolf regarding Public Service Company of Colorado's rate design proposal. On behalf of Energy Outreach Colorado. June 6, 2016.

**Nevada Public Utilities Commission (Docket Nos. 15-07041 and 15-07042):** Direct testimony on NV Energy's application for approval of a cost of service study and net metering tariffs. On behalf of The Alliance for Solar Choice. October 27, 2015.

**Missouri Public Service Commission (Case No. ER-2014-0370):** Direct and surrebuttal testimony on the topic of Kansas City Power and Light's rate design proposal. On behalf of Sierra Club. April 16, 2015 and June 5, 2015.

**Wisconsin Public Service Commission (Docket No. 05-UR-107):** Direct and surrebuttal testimony of Rick Hornby regarding Wisconsin Electric Power Company rate case. On behalf of The Alliance for Solar Choice. August 28, 2014 and September 22, 2014.

**Maine Public Utilities Commission (Docket No. 2013-00519):** Direct testimony of Richard Hornby and Martin R. Cohen on GridSolar's smart grid coordinator petition. On behalf of the Maine Office of the Public Advocate. August 28, 2014.

**Maine Public Utilities Commission (Docket No. 2013-00168):** Direct and surrebuttal testimony of Tim Woolf regarding Central Maine Power's request for an alternative rate plan. December 12, 2013 and March 21, 2014.

**Massachusetts Department of Public Utilities (Docket No. 14-04):** Comments of Massachusetts Department of Energy Resources on investigation into time varying rates. On behalf of the Massachusetts Department of Energy Resources. March 10, 2014.

**State of Nevada, Public Utilities Commission of Nevada (Docket No. 13-07021):** Direct testimony of Frank Ackerman regarding the proposed merger of NV Energy, Inc. and MidAmerican Energy Holdings Company. On behalf of the Sierra Club. October 24, 2013.

## PRESENTATIONS

Whited, M. 2024. "Benefits of Offshore Wind in New England" Webinar presentation sponsored by Sierra Club, June 24, 2024.

Whited, M. 2021. "Evolution of Net Metering in Hawaii." Presentation to the NARUC Winter Policy Summit. February 4.

Biewald, B., M. Whited. "Evaluating and Shaping the Impacts of EVs on Customers: Tools for Consumer Advocates." Presentation at the NASUCA Mid-Year Meeting, June 19, 2019.

Whited, M. 2019. "Performance Incentive Mechanisms." Presentation to the 2019 Pennsylvania Public Utility Law Conference, Harrisburg, PA. May 31.

Whited, M. 2018. "Smart Non-Residential Rate Design: Designing for the Future." Presentation to the NARUC Annual Meeting, Orlando, FL. November 11.

Whited, M. 2016. "Energy Policy for the Future: Trends and Overview." Presentation to the National Conference of State Legislators' Capitol Forum, Washington, DC, December 8.

Whited, M. 2016. "Rate-making for the Future: Trends and Considerations." Presentation to the Midwest Governors' Association, St. Paul, MN, July 14.

Whited, M. 2016. "Performance Based Regulation." Presentation to the NARUC Rate Design Subcommittee. September 12.

Whited, M. 2016. "Demand Charges: Impacts and Alternatives (A Skeptic's View)." EUCI 2<sup>nd</sup> Annual Residential Demand Charges Summit, Phoenix, AZ, June 7.

Whited, M. 2016. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Wisconsin Workshop, Madison WI, March 29.

Whited, M., T. Woolf. 2016. "Caught in a Fix: The Problem with Fixed Charges for Electricity." Webinar presentation sponsored by Consumers Union, February.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the National Governors Association, Learning Lab on New Utility Business Models & the Electricity Market Structures of the Future, Boston, MA, July 28.

Whited, M. 2015. "Rate Design: Options for Addressing NEM Impacts." Presentation to the Utah Net Energy Metering Workgroup, Workshop 4, Salt Lake City, UT, July 8.

Whited, M. 2015. "Performance Incentive Mechanisms." Presentation to the e21 Initiative, St. Paul, MN, May 29.

Whited, M., F. Ackerman. 2013. "Water Constraints on Energy Production: Altering our Current Collision Course." Webinar presentation sponsored by Civil Society Institute, September 12.

Whited, M., G. Brown, K. Charipar. 2011. "Electricity Demand Response Programs and Potential in Wisconsin." Presentation to the Wisconsin Public Service Commission, April.

Whited, M. 2010. "Economic Impact of Irrigation Water Transfers in Uvalde County, Texas." Presentation at the Mid-Continent Regional Science Association's 41st Annual Conference/IMPLAN National User's 8th Biennial Conference in St. Louis, MO, June

Whited, M., M. Grabow, M. Hahn. 2009. "Valuing Bicycling's Economic and Health Impacts in Wisconsin." Presentation before the Governor's Coordinating Council on Bicycling, December.

Whited, M., D. Sheard. 2009. "Water Conservation Initiatives in Wisconsin." Presentation before the Waukesha County Water Conservation Coalition Municipal Water Conservation Subgroup, July.

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