

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY COMPANY
FOR APPROVAL OF ITS DEFAULT
SERVICE PROGRAM

DOCKET NO. P-2012-_____

DIRECT TESTIMONY

WITNESS: CHANTALE LACASSE

SUBJECTS: RFP PROCESS, PRODUCTS, LOAD CAPS
ROLE OF INDEPENDENT EVALUATOR
RFP PROTOCOLS

DATED: JANUARY 13, 2012

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1 provided consulting advice on competitive bidding processes and on antitrust matters
2 on a freelance basis.

3 I was hired by NERA in 2001. My consulting experience at NERA has principally
4 consisted of providing conceptual advice on the design of competitive bidding
5 processes, of providing detailed practical advice on their implementation, and of
6 managing the bidding processes themselves. My recent engagements have been as
7 follows.

8 First, I provided advice to and assisted PECO Energy Company (“PECO” or the
9 “Company”) in the design, implementation and administration of a competitive
10 bidding process for the Company’s default service procurement plan for the period
11 that started at the expiration of rate caps on January 1, 2011 (“DSP I”). I developed
12 some of the elements of the procurement plan and drafted the rules for its
13 implementation. I reviewed some of the elements designed by PECO and provided
14 advice so that the Requests for Proposals (“RFPs”) used to solicit bids would attract
15 strong participation and yield prices consistent with the market. NERA serves as the
16 Independent Evaluator for PECO’s RFPs for full requirements products and for block
17 energy under this procurement plan. NERA manages the competitive bidding process
18 as approved by the Pennsylvania Public Utility Commission (“PaPUC” or
19 “Commission”). In this role, NERA responds to bidder questions; maintains a web
20 site to provide information to bidders; qualifies bidders; and administers the bidding
21 procedures by which bids are received and evaluated.

22

1 Second, I have assisted other utilities in Pennsylvania in designing and implementing
2 competitive bidding processes for their procurement of default service. PPL Electric
3 Utilities Corporation (“PPL Electric”) retained NERA to serve as Independent
4 Evaluator starting in 2007. NERA administered PPL Electric’s RFPs for the
5 procurement of full requirements products for its Competitive Bridge Plan. NERA
6 continued in this role for PPL Electric’s first Default Service Procurement Plan and
7 administered the RFPs for full requirements products, block energy, alternative
8 energy credits (“AECs”), long-term supply, and monthly products. I provided advice
9 to Pennsylvania Power Company (“Penn Power”) in 2005, and again later for its first
10 Default Service Program following its integration into the PJM footprint, regarding
11 the design and implementation of a competitive solicitation to procure full
12 requirements supply for its default service customers. I provided advice to the
13 Metropolitan Edison Company (“Met-Ed”) and to the Pennsylvania Electric
14 Company (“Penelec”) in 2006, and again later for their first Default Service
15 Programs, for the procurement of full requirements products for their default service
16 customers. NERA also served as the Independent Evaluator for Met-Ed, Penelec, and
17 Penn Power.

18 Third, in New Jersey, I have served as the auction manager for the statewide Basic
19 Generation Service auctions (the “BGS Auctions”) since their inception. Every year I
20 provide advice on improvements to the competitive bidding process and assist the
21 four New Jersey Electric Distribution Companies (“EDCs”) in formulating their
22 proposal for submission to the New Jersey Board of Public Utilities (“BPU”). I
23 manage the competitive bidding process as approved by the BPU by responding to

1 bidder questions; maintaining a web site to provide information to bidders; preparing
2 and leading training sessions for bidders; qualifying bidders; and administering the
3 bidding procedures by which bids are received and processed in accordance with
4 procedures approved by the BPU.

5 Fourth, in Illinois, I have assisted the Illinois Power Agency (“IPA”) since its creation
6 in 2008 with the procurement of standard block products and renewable energy
7 credits for the portfolio of Commonwealth Edison Company (“ComEd”). Before
8 each procurement event, NERA administers a comment process on the contract terms
9 and credit instruments and takes these comments into account when finalizing the
10 standard forms of the contract and credit instruments that all suppliers will use. I
11 prepare detailed rules for the conduct of the competitive bidding processes and serve
12 as procurement administrator and evaluator. At the conclusion of the bidding
13 process, NERA prepares a confidential report for the Illinois Commerce Commission.

14 Finally, NERA has been retained on other occasions where I have been called upon to
15 advise on the design and implementation of competitive bidding processes, most
16 notably by the Independent System Operator of New England in its redesign of
17 certain aspects of the forward capacity market; by the Legal Services Commission
18 (UK) in its design of a competitive bidding process for the procurement of legal aid
19 services; and by the Comisión Nacional de Energía (Spain) in its implementation of a
20 competitive bidding process for the procurement of base load products.

21 **4. Q. What is your educational background?**

1 A. I hold an Honors B. Soc. Sc. in Economics (1983) and an Honors B.A. in
2 Mathematics (1984) from the University of Ottawa (Canada). I hold an M.A. (1986)
3 and a Ph.D. in Economics (1991) from the University of Western Ontario (Canada).

4 **5. Q. Have you prepared an Exhibit that sets forth your professional experience and**
5 **educational background?**

6 A. Yes. PECO Ex. CL-1 is my curriculum vitae and it provides those details.

7 **6. Q. What is the purpose of your testimony?**

8 A. In this Default Service procurement plan (“DSP II”), PECO is proposing to procure
9 fixed-price full requirements supply through an RFP process for all but its largest
10 commercial and industrial default service customers. PECO requested that NERA
11 identify for DSP II potential improvements to the RFP process on the basis of the
12 successful experience under DSP I as well as NERA’s experience from other
13 procurement processes. PECO also requested that NERA review specific elements of
14 the procurement plan designed by PECO. My testimony:

- 15 • describes the RFP process, proposes modifications to improve the RFP process,
16 and explains why the RFP process should be approved;
- 17 • reviews the product structure proposed by PECO for DSP II and discusses a
18 simplification in the administration of limits to the amounts that any one supplier
19 can bid and win (the “load caps”);
- 20 • reviews the calculation of the number of tranches to be procured; and

1 • summarizes NERA’s role as independent evaluator and the protocols that NERA
2 will follow to conduct the solicitations under the RFP process.

3 **7. Q. What exhibits are attached to and incorporated in your direct testimony?**

4 A. To my testimony are attached:

5 • The RFP form (PECO Ex. CL-2), which contains a number of appendices,
6 including the forms that potential suppliers would use to submit their
7 qualifications; and

8 • The RFP protocol (PECO Ex. CL-3), which describes how NERA will manage
9 the RFP process and will communicate with all parties.

10 **8. Q. How is the remainder of your testimony organized?**

11 A. Section II of my testimony reviews the key elements of the RFP process and explains
12 the proposed changes to this process for DSP II. Section III summarizes the products
13 proposed to be procured in DSP II and explains the proposed simplification to the
14 administration of the load caps and the calculation of the number of tranches to be
15 procured. Section IV summarizes the activities that NERA will undertake in its role
16 as Independent Evaluator as provided in more detail in the RFP Protocol.

17 **II. PROPOSAL FOR MODEST CHANGES TO THE RFP PROCESS BUILDING**
18 **UPON THE SUCCESS OF DSP I**

19 **9. Q. Has the RFP Process under DSP I been successful?**

1 A. Yes. Under DSP I, the Commission has thus far approved the results of every
2 solicitation for fixed-price full requirements service. Each solicitation has attracted
3 robust participation leading to prices for customers consistent with then current
4 market conditions. The main activities of each solicitation, including the submission
5 of possible modifications to the credit instruments, the qualification of bidders, and
6 the submission of bids, were completed successfully and on schedule.

7 **10. Q. Are you proposing changes to the RFP Process?**

8 A. I am proposing minor modifications and improvements to the RFP process. As I
9 testified, the RFP process under DSP I has been successful and the modifications that
10 I propose build on this success. The vast majority of the elements of the RFP process
11 would remain unchanged. The modifications and improvements that I propose either
12 have the objective of conducting the solicitations more efficiently and reducing
13 administrative costs or have the objective of reducing the burden to suppliers and thus
14 encouraging their participation in the RFP process. Such improvements would tend
15 to provide savings for customers – either directly or through the lower prices that
16 competition would be expected to bring.

17 **11. Q. What are the key elements of the RFP process used under DSP I?**

18 A. The key elements of the RFP process are:

- 19 • The communication with bidders;
- 20 • The qualification of bidders;

- 1 • The submission and evaluation of bids; and
- 2 • The reports provided to the Commission.

3 **12. Q. Please describe how the Independent Evaluator communicates with bidders.**

4 A. The RFP Protocol establishes how NERA communicates with bidders. In particular,
5 the Protocol specifies the procedures for managing the dissemination of information
6 to bidders and ensuring that information is provided fairly and equally to all bidders.
7 In order to provide information to bidders on a fair and equal basis, NERA maintains
8 a web site that provides bidders with access to data, including hourly usage data,
9 number of retail customers, and capacity peak load contributions. The web site also
10 allows bidders to submit questions concerning the RFP process and/or data provided.
11 If PECO receives any questions directly, PECO directs those questions to NERA.

12 NERA responds individually to each questioner and posts the question and answer to
13 the frequently asked questions (“FAQs”) page of the RFP web site so that all bidders
14 have access to the same information. When necessary, NERA draws on PECO’s
15 expertise in drafting responses after the identity of the questioner is redacted.

16 NERA communicates with bidders regarding the status of their proposals or bids with
17 the Representative or the Officer of the bidder to maintain the confidentiality of the
18 bidder’s information. A bidder submits its proposal in two parts and, after processing
19 each part, NERA notifies the bidder of the status of its proposal. Any notification
20 that a bidder has qualified to continue in the RFP process, along with any documents

1 necessary for such participation, are delivered by overnight delivery service to the
2 address provided for the Representative.

3 **13. Q. Please describe how the Independent Evaluator qualifies bidders.**

4 A. The bidder qualification process requires bidders to submit their proposals in two
5 parts. All representations and certifications required in the RFP process must be
6 made by a single individual. This individual must be an individual who can bind the
7 bidder and is authorized to undertake contracts, including the Supplier Master
8 Agreement (“SMA”), which is the standard contract that suppliers and PECO execute
9 for the provision of default service supply. Such an individual is an “Officer of the
10 bidder”.

11 In the Part 1 proposal, all bidders are required to submit to a creditworthiness
12 assessment and have the opportunity to propose modifications to the standard credit
13 instruments. Bidders that are not existing suppliers are also required to demonstrate
14 that they can fulfill all technical and regulatory requirements of the SMA and provide
15 information for the preparation of the SMA and, if applicable, for preparation of the
16 guaranty. The bidder represents that it is bidding independently and that all
17 information provided is accurate and will remain valid throughout the RFP process.

18 In the Part 2 proposal, all bidders provide pre-bid security to support their bids.
19 Bidders that are not existing suppliers are also required to submit a signed SMA and,
20 if the supplier is relying on the financial standing of a guarantor, the bidder is
21 required to submit a guaranty. The bidder certifies that the bids it submits will be

1 binding and agrees to promptly execute transaction confirmations for winning bids if
2 the Commission approves the results of the solicitation.

3 For each part of the proposal, NERA evaluates whether the bidder has submitted all
4 information and documents in a manner consistent with the RFP process. NERA
5 advises the bidder of any deficiencies in the proposal and provides a pre-determined
6 period to cure any such deficiencies.

7 **14. Q. Please describe how bidders submit bids and how the Independent Evaluator**
8 **evaluates the bids.**

9 A. After qualifying to bid pursuant to complete Part 1 and Part 2 proposals, bidders may
10 submit their bids or price offers. A bidder submits a separate price offer for each
11 tranche that it wishes to supply, stated in dollars per MWh. A bidder may bid on as
12 many tranches as are available subject to load cap restrictions and provided that these
13 bids are supported by sufficient pre-bid security. A bidder uses a spreadsheet
14 provided by the Independent Evaluator to enter its bids and submits its bids through a
15 secure electronic interface.

16 Bids are evaluated on a price-only basis. For each product, NERA selects the lowest-
17 priced bids to fill the available tranches and presents these to the Commission as
18 winning bids.

19 **15. Q. Please describe the reports that NERA submits to the Commission in its role as**
20 **Independent Evaluator.**

21 A. NERA provides two confidential reports to the Commission.

1 Ten days before bids are due, if desired by the Commission, NERA provides a
2 'Market Information Report'. This report summarizes the then-current market
3 conditions. NERA is available for any questions or any supplemental information
4 request from the Commission in this regard. Further, if there are significant changes
5 in market conditions in the ten-day period immediately preceding the bid date, NERA
6 updates its analysis for the Commission.

7 The day after bids are due, NERA provides to the Commission a full factual report on
8 the results of the solicitation. This report summarizes the efforts to inform potential
9 suppliers of the solicitation, the results of the procedure to qualify bidders, as well as
10 the results of the evaluation of the bids. The Commission renders a decision on the
11 results of the solicitation within one business day of the submission of the report. If
12 the Commission does not act within one business day of receiving the confidential
13 report, the results of the solicitation are deemed approved.

14 **16. Q. What changes are you proposing to the RFP process?**

15 A. I am proposing the following modifications to the RFP process:

- 16 • moving to a more compressed schedule;
- 17 • allowing bidders to submit the forms for both their Part 1 and Part 2 proposals at
18 the same time; and
- 19 • giving bidders the option to receive notifications and documents via email or
20 through an electronic secure file transfer.

1 **17. Q. How will a more compressed schedule improve the RFP process?**

2 A. NERA's experience as Independent Evaluator has resulted in processing proposals in
3 a more efficient way. Suppliers have become more familiar with the requirements
4 and the procedures of the RFP process. This is evidenced by the declining number of
5 questions received regarding the requirements for proposals and the procedures for
6 the submission of materials. The schedule, which under DSP I provided ample time
7 for the various RFP activities, can be compressed without any hardship to bidders. I
8 propose to shorten the pre-solicitation activities, including bidder comments on the
9 credit instruments, by thirty (30) days and to shorten the processing times for the Part
10 1 proposals, the Part 2 proposals, and the bids by ten (10) days. I would expect this to
11 reduce the administrative costs of each solicitation because there will be fewer days
12 during which NERA staff must be available to process materials and there will be
13 efficiencies created from combining tasks.

14 **18. Q. How will the submission of the Part 1 and Part 2 forms at one time improve the**
15 **RFP process?**

16 A. All representations and certifications required in the RFP process are, for a given
17 bidder, made by a single individual. It is known to happen that the individual who
18 made the representations in the Part 1 proposal is not available when the Part 2
19 proposal is submitted for a variety of legitimate reasons. The compression in the
20 schedule should help in this regard. However, I also propose that bidders be given
21 the option of submitting all the representations for the RFP process at once. The
22 Officer of the bidder would then be able to make all the representations that are

1 required and included in the Part 1 and Part 2 forms at a given point in time. This is a
2 simple solution. Although other solutions exist, such as requiring the bidder to name
3 more than one individual able to bind the bidder or requiring an authorization for
4 another individual to make the representation in the Part 2 proposal, these alternatives
5 increase the burden to bidders and may not be as successful at preserving the integrity
6 of the RFP process.

7 **19. Q. How will the option to receive notifications and documents via email or through**
8 **an electronic secure file transfer improve the RFP process?**

9 A. In DSP I, a notification that was sent by overnight delivery to a bidder regarding its
10 qualification status was also sent by fax. Further, any deficiency notice regarding
11 proposal materials was sent by fax and bidders were asked to provide their response
12 by fax as well. There exist other electronic modes of communications that would
13 provide for timely and secure communications between the Independent Evaluator
14 and the bidders. Most entities prefer to use other electronic modes of communication
15 rather than fax, which may soon become obsolete. I propose giving bidders the
16 option of how they wish to communicate with the Independent Evaluator including
17 fax, email, and the use of a secure electronic interface for documents. Further, a
18 bidder that elects to communicate with the Independent Evaluator by email or secure
19 file transfer will be able to name other authorized individuals who will be copied on
20 these communications. This should reduce the burden of participation for bidders and
21 to this extent continue to promote robust participation in the RFP Process.

1 **20. Q. Are NERA’s proposals on these items reflected in PECO Ex. CL-2, the proposed**
2 **RFP, and in PECO Ex. CL-3, the RFP Protocol?**

3 A. Yes.

4 **21. Q. Is PECO Ex. CL-2, the proposed RFP, otherwise identical to the documents that**
5 **were approved by the Commission in DSP I?**

6 A. No. Although the requirements for qualification are identical and the structure of the
7 process is the same, the RFP documents account for the changes made from DSP I to
8 DSP II, including the procurement of supply through a single full requirements RFP
9 and the procurement of supply for the Large Commercial and Industrial Class through
10 PJM-administered markets. The proposed RFP documents also reflect other minor
11 simplifications in the administration of the RFP process for the benefit of bidders,
12 including:

- 13 • Electronic submission of the Part 1 and Part 2 Forms;
- 14 • Extension of the approval of alternate guarantees to the entire term of DSP II;
- 15 • Elimination of the requirement for suppliers that rely on the financial standing of a
16 guarantor with an existing guaranty for the maximum allowable amount to re-issue
17 the guaranty for each solicitation;
- 18 • Addition of an option for suppliers to request signatures pages of the SMA be
19 returned if they are not winning bidders; and

- Clarification that suppliers participating under an Agency Agreement that have several principals with the lowest credit rating must rely on the financial standing of the principal that has the lowest tangible net worth.

III. SIMPLIFICATION OF THE LOAD CAPS AND CALCULATION OF TRANCHE TARGETS

22. Q. Please summarize the products PECO proposes to procure under DSP II.

A. For procurement and rate design purposes, PECO divides its customers into the following classes:

- Residential;
- Small Commercial (below 100 kW);
- Medium Commercial (100 kW to 500 kW);
- Large Commercial and Industrial (“Large C&I”) (over 500 kW).

Under DSP II, PECO proposes, for the Large C&I Class, to procure energy and all other required services directly from the PJM energy markets and to act as the Load Serving Entity. For its Residential, Small Commercial, and Medium Commercial default service customers, PECO proposes to procure fixed-price full requirements service through a competitive bidding process. Default service supply for the Residential Class ultimately would consist of overlapping one-year and two-year contracts procured every six (6) months under DSP II. The transition to DSP II from DSP I, for which PECO serves 25% of the Residential Class load with block and spot

1 purchases, would require the procurement of products with terms varying from five
2 (5) to twenty-four (24) months. Default service supply for the Small Commercial
3 Class would ultimately consist of laddered one-year contracts procured every six (6)
4 months. The transition to DSP II from DSP I for the Small Commercial Class would
5 require the purchase of six-month contracts in the first solicitation of DSP II, since
6 the DSP I supply contracts for this class end on May 31, 2013. Default service supply
7 for the Medium Commercial Class would consist of six-month contracts (no
8 laddering) procured shortly before the beginning of each supply period.

9 **23. Q. Please explain the calculation of tranche targets for the products under DSP II.**

10 A. The tranche target for a Class is the total number of tranches procured for that Class.
11 The tranche size, as used in the RFP Rules, is the percentage of the Default Service
12 Class load represented by a tranche.

13 Under DSP II, PECO proposes to maintain the tranche size of the Residential Class in
14 order to ease administration of obligations associated with block purchases in DSP I.
15 The number of full requirements tranches procured will increase as full requirements
16 tranches replace the existing block energy contracts and will reach a total of 60
17 tranches.

18 For the Small Commercial and Medium Commercial Classes, the number of tranches
19 is changed from DSP I for two reasons. First, under DSP I, the number of tranches
20 and tranche size were set separately for spot-price and fixed-price service. However,
21 under DSP II, PECO is not proposing to procure spot-price service. Second, the
22 calculation takes into account of the growing number of these customers that take
23 service from an EGS.

1 The number of tranches for the Small Commercial and Medium Commercial Classes
2 in DSP II is set to balance two risks. There is a risk that if the tranche number is set
3 too high, the load associated with each tranche will be too low and reduce supplier
4 interest. There is an opposite risk if the tranche number is set too low. A low tranche
5 number will result in fewer potential winning suppliers, which may in itself reduce
6 supplier interest. Further, with a low number of tranches (and correspondingly a high
7 load per tranche), suppliers could worry that load associated with each tranche could
8 become very large if customers return to default service. The number of tranches
9 proposed balances these two risks, and the RFP Rules allow PECO and the
10 Independent Evaluator to re-size these tranches if the amount of Default Service load
11 changes during the course of DSP II.

12 **24. Q. Please explain the proposed simplification to the administration of the load caps.**

13 A. The load caps under DSP I are administered so that the customers of a Class have no
14 more than a 65% exposure to any one supplier at any given time. If, for example,
15 tranches of a 12-month product for the Small Commercial Class were procured in two
16 solicitations, with five (5) tranches in the September solicitation and five (5) tranches
17 procured in the subsequent January solicitation, a supplier would be restricted from
18 bidding on more than three (3) tranches in the September solicitation. Further, the
19 supplier would not be able to bid on all available tranches in the January solicitation
20 if the supplier had won more than one (1) tranche in the September solicitation. In
21 that case, the supplier would be restricted to bidding on six (6) tranches less any
22 tranches won in the September solicitation.

1 I propose to simplify the administration of the load caps so that each supplier may not
2 hold more than 67% of all tranches for a Class procured under DSP II. In the
3 previous example, a supplier would be restricted from bidding and winning more than
4 six tranches across both the September and the subsequent January solicitations. The
5 supplier would be able to bid on all five (5) tranches available in the September
6 solicitation. As is the case in DSP I, the supplier would not be able to bid on all
7 available tranches in the January solicitation if the supplier had won more than 1
8 tranche in the September solicitation. In that case, the supplier would be restricted to
9 bidding on six (6) tranches less any tranches won in the September solicitation.

10 I also propose a load cap of 67% rather than a load cap of 65%. This is a minor
11 adjustment that will help participation when there is a small number of tranches for a
12 class in a given solicitation. For example, if there are three (3) tranches available for
13 a class, a load cap of 65% restricts any one supplier to one (1) tranche. A load cap of
14 67% would allow a supplier to bid on two (2) of the three (3) tranches. Avoiding a
15 situation where bidders may only bid on one (1) tranche is desirable as suppliers may
16 not be willing to invest the time and resources to prepare bids for an amount as small
17 as one tranche. Thus, the minor adjustment in the load cap could further encourage
18 participation in the RFP.

19 IV. NERA'S ROLE AS INDEPENDENT EVALUATOR

20 **25. Q. Do you propose any changes to the division of responsibilities for the**
21 **administration of the RFP Process?**

1 A. No. The process has worked well and there is no reason for change. NERA will
2 continue to be the main point of contact with bidders and will ensure that the RFP
3 process and rules, as approved by the Commission, are followed. NERA will also
4 continue to provide reports to the Commission to facilitate its review of the results of
5 each solicitation. PECO will continue to assess the creditworthiness of bidders, to
6 review proposed changes to credit instruments, and to review contract documents.

7 **26. Q. Please elaborate on the interactions between NERA and PECO as part of the**
8 **RFP process and, in particular, on the access that PECO may have to**
9 **confidential information.**

10 A. As mentioned previously, the RFP Protocol establishes how NERA manages the RFP
11 process and communicates with potential suppliers, PECO, and Commission Staff.
12 The RFP Protocol identifies the RFP information that will be made available to
13 PECO and also the confidentiality of such information. PECO designates specific
14 individuals who take part in the implementation of the Default Service procurement
15 plan. These individuals, as well as designated individuals from NERA, sign the
16 Confidentiality Statement included as an appendix to the RFP and commit to strictly
17 adhere to the RFP Protocol. NERA maintains a master list of individuals who have
18 access to confidential information.

19 **27. Q. Are you proposing changes to the RFP Protocol in regards to PECO's access to**
20 **confidential information?**

21 A. Yes. As is the case under DSP I, if the Commission approves the results of a
22 solicitation, NERA provides PECO with the information necessary to administer the

1 winning contracts, namely the identity of the winning bidders, the amount that they
2 will supply of each product, and the price for each product and supplier based on its
3 approved bids for that product. Other than the information that it needs to administer
4 the contracts, PECO does not have access to confidential information of particular
5 bidders. However, as an enhancement in DSP II, I propose to make available to
6 PECO additional information to assist it in assessing whether the products offered
7 could be improved in future procurement plans and to assist it in finalizing its
8 contingency plans should the results of any solicitation be rejected by the
9 Commission. To that end, I propose to make available to PECO in a redacted format
10 the factual report provided to the Commission on the results of the solicitation. The
11 report would be redacted so that PECO does not receive information about bids that is
12 bidder-specific or proposal information that a bidder may consider confidential or
13 proprietary. Further, I propose providing the report at the conclusion of the
14 solicitation, namely when all contracts with winning suppliers that are approved by
15 the Commission have been executed.

16 **28. Q. Is the information that would be provided to PECO as part of this redacted**
17 **report detailed in the RFP Protocol?**

18 A. Yes, it is detailed in PECO Ex. CL-3, which is the RFP Protocol.

19 V. CONCLUSION

20 **29. Q. Dr. LaCasse, does this conclude your direct testimony?**

21 A. Yes.