

Professional Summary

Chris specializes in analysis of markets for energy efficiency, demand response, renewable energy and strategic electrification measures, as well as the design and evaluation of programs and policies – including climate policies – to promote them. During his 25+ years in the industry, he has worked for energy regulators, utilities, government agencies and advocacy organizations in 30+ states, 7 Canadian provinces and several European countries. He has filed expert witness testimony in 75+ cases before regulatory commissions in 14 different jurisdictions; he has also testified before several state legislatures. Chris has authored numerous reports and papers on clean energy policies and programs, including the *National Standard Practice Manual for Benefit Cost Analysis of Distributed Energy Resources* (2020), *A Comparison of Clean Heat Standards: Current Progress and Key Elements*, and several reports on electric non-wires and gas non-pipe alternatives.

Experience

2010-present: Principal, Energy Futures Group, Hinesburg, VT

1999-2010: Director of Planning & Evaluation, Vermont Energy Investment Corp., Burlington, VT

1993-1999: Senior Analyst, Vermont Energy Investment Corp., Burlington, VT

1992-1993: Energy Consultant, Lawrence Berkeley National Laboratory, Gaborone, Botswana

1986-1991: Senior Policy Analyst, Center for Clean Air Policy, Washington, DC

Education

M.P.P., University of Michigan, 1986

B.A., Political Science, University of Michigan, 1985

Selected Projects

- **Natural Resources Defense Council (Illinois, Michigan and Ohio).** Critically review energy efficiency, demand response, electrification, distribution system investment and integrated resource plans filed by IL, MI and OH utilities. Draft/defend regulatory testimony on critiques. Represent NRDC in stakeholder-utility engagement processes, including Future of Gas processes. Represent NRDC in collaborative development of non-wires solution pilots. Conduct analyses of electrification economics. Support development of Illinois and Michigan clean energy legislation. (2010 to present)
- **E4TheFuture.** Co-authored National Standard Practice Manual Benefit Cost-Analysis of Distributed Energy Resources (2020) and NSPM for efficiency (2017), as well as forthcoming updated version of NSPM for DERs (expected late 2025). Present the NSPM to audiences across the U.S. and Canada; helping several to assess how to use it to refine current practices. Trainer for the first three NSPM certification courses in Toronto, Washington DC and Boston. (2016-present)

Energy Futures Group, Inc

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- **Maryland Public Service Commission.** Part of team that led a year-long stakeholder Work Group in the development of a unified benefit-cost analysis (UBCA) framework for consideration of all distributed energy resources initiatives in Maryland. Lead author of the final Work Group report and recommendations to the Commission. Currently leading similar Work Group process to identify common methodologies to use in quantifying benefit and cost inputs to UBCA. (2023-present)
- **Efficiency One (Nova Scotia).** Part of team that led a stakeholder Work Group process to update the benefit-cost analysis framework for energy efficiency, demand response, electrification and other DER initiatives in Nova Scotia. Serving as expert witness on recommendations. (2023-present)
- **Ontario Energy Board.** Appointed to serve on provincial gas DSM Evaluation Advisory Committee, providing input on multi-year evaluation plans, scopes of work for evaluation studies and independent evaluator assessments of utilities' annual gas savings claims. Also serve on gas IRP committee, providing input on non-pipe alternatives, including cost-effectiveness analyses and selection of pilot projects. Previously also appointed to advisory committees on gas and electric efficiency potential studies and advisory committee on carbon price forecast studies. (2015-present)
- **Green Energy Coalition and Environmental Defence (Ontario).** Represent coalition of environmental groups in regulatory proceedings, utility negotiations and stakeholder meetings on DSM policies, utility proposed DSM Plans, integrated resource planning and rules governing non-pipe alternatives, and how concerns about decarbonization and the energy transition should affect Enbridge Gas' rebasing proposals. (1993 to present)
- **Connecticut Energy Efficiency Board.** Part of team providing on-going review and input on utility efficiency program planning and related policy issues. Lead role in providing input on New England Avoided Energy Supply Cost study and cost-effectiveness screening policy issues. (2019-present)
- **Energy Action Network (Vermont).** Co-authored a white paper on the concept of a "Clean Heat Standard" – a performance standard that would impose increasing obligations on Vermont Gas and wholesale suppliers of fuel oil and propane to reduce greenhouse gas emissions from burning of fossil fuels in homes and businesses. Co-lead related voluntary working group of interested parties providing input on the design of the policy. Testified before Vermont House Energy and Technology Committee on Clean Heat Standard legislation. (2020-present)
- **Virginia State Corporation Commission.** Part of team that led a stakeholder Work Group in updating the benefit-cost analysis framework for Virginia electric utility investments in energy efficiency and demand response. Led most technical discussions in eight Work Group meetings. Helped draft final Work Group report and recommendations to the Commission. (2024-2025)
- **Natural Resources Defense Council (New Jersey).** Provide analysis and technical support on issues related to building electrification, including the "headroom" on the grid for electrifying space heating before winter peak demand becomes comparable to summer peak demand. (2025)
- **Environmental Defense Fund.** Provided technical support in reviewing and developed draft comments on draft proposals from the Massachusetts Department of Environment on different elements of the state's forthcoming Clean Heat Standard regulations. Co-authored white paper on

- Clean Heat Standards (CHS); comparing CHS approaches of Colorado, Vermont, Massachusetts and Maryland; and providing recommendations on key CHS design choices. (2023-2024)
- **Maryland Department of the Environment.** Developed and analyzed pathways for decarbonization of Maryland's residential and commercial buildings, provided as part of a Regulatory Assistance Project report on the design of a Clean Heat Standard for the state. (2023)
 - **Vermont Agency of Natural Resources.** Supported EFG/Cadmus team in analysis of pathways for achieving the state's Global Warming Solutions Action emission reduction requirements, including marginal abatement cost curve development (2022). Supporting new assessment of emissions and cost tradeoffs between policy options for decarbonizing buildings and industry sectors (2023).
 - **Environmental Defense Fund and other Illinois Public Interest Organizations.** Analyzed customer economics of electrification in Peoples Gas service territory (Chicago area) under proposed rate increases. Documented analysis, results and risks to future ratepayers of over-investment in gas infrastructure in expert witness testimony in Peoples rate case. (2023)
 - **Sierra Club (Massachusetts).** Supported Sierra Club's participation in a year-long "Future of Gas" process in which Massachusetts' gas utilities engaged with stakeholders to discuss and consider the future of their industry in the context of the state's decarbonization policy. Reviewed draft inputs to technical study of options for decarbonizing the gas industry and assisted in drafting regulatory comments on final study results as well as gas utility policy proposals. (2021-2022).
 - **Environmental Law and Policy Center.** Filed expert witness testimony supporting AEP Ohio's initial proposal to run a portfolio of efficiency programs and in opposition to a proposed rate case settlement agreement to eliminate such programs. (2021)
 - **Sierra Club (Maryland).** Provided strategic support on testimony on cost-effectiveness and other rules governing expansion of gas infrastructure to connect additional customers. (2021)
 - **New Jersey Board of Public Utilities.** Served on management team responsible for statewide delivery of New Jersey Clean Energy Programs. Led strategic planning; support regulatory filings, cost-effectiveness analysis & evaluation work. (2015 to 2020). Served on management team for start-up of residential and renewables programs for predecessor project. (2006-2010)
 - **Regulatory Assistance Project - U.S.** Provided guidance on efficiency policy and programs. Lead author on strategic reports on program options for decarbonizing Vermont buildings, achieving 30% electricity savings in 10 years, using efficiency to defer T&D system investments, & bidding efficiency into capacity markets. (2010 to 2020)
 - **Energy Efficiency Alberta.** Assisted EEA in providing input to Alberta Utilities Commission on the role efficiency resources can play in reducing electric system costs. (2019 to 2020)
 - **Consumers Association of Canada (Manitoba) and Winnipeg Harvest.** Critically reviewed and filed regulatory testimony on Efficiency Manitoba's first three-year plan (2020-2023), with particular emphasis on the extent to which the plan supported advanced heat pump technology as both an electric efficiency measure and a key to future building electrification. (2019-2020).
 - **Citizens Action Coalition of Indiana.** Critically reviewed how energy efficiency resources were modeled in utility IRPs, as well as the design of energy efficiency program portfolios. (2018 to 2020)

- **Efficiency Vermont.** Provided technical support in review of avoided cost assumptions, as well as related policies on cost-effectiveness analyses of efficiency resources (2019).
- **Earth Justice and Southern Alliance for Clean Energy.** Helped critically review Florida utilities' efficiency potential studies and proposed 2020-2024 energy efficiency savings targets. (2019)
- **New Hampshire Office of the Consumer Advocate.** Drafted expert witness testimony on the merits of utilities adding a pilot non-wires solution project to their efficiency program plans. (2018)
- **Regulatory Assistance Project - Europe.** Provide on-going support on efficiency policies and programs in the United Kingdom, Germany, and other countries. Reviewed draft European Union policies on Energy Savings Obligations, EM&V protocols, and related issues. Drafted policy brief on efficiency feed-in-tariffs and roadmap for residential retrofits. (2009 to 2018)
- **Green Mountain Power (Vermont).** Supported development and implementation of GMP's first compliance plan for Vermont RPS Tier 3 requirement to reduce customers' direct consumption of fossil fuels, with significant emphasis on strategic electrification strategies. Also developed 10-year forecast of sales that could result from three different levels of policy/program promotion of residential electric space heating, electric water heating and electric vehicles. (2016 to 2018)
- **Alberta Energy Efficiency Alliance.** Drafted white paper how treatment of "efficiency as a resource" could be institutionalized in Alberta. The paper followed several presentations to government agencies and others on behalf of the Pembina Institute. (2017 to 2018)
- **Southern Environmental Law Center.** Assessed reasonableness of Duke Energy's historic efficiency program savings claims, as well as the design of their efficiency program portfolios for 2019. Filed expert witness testimony on findings in North Carolina dockets (2018).
- **Toronto Atmospheric Fund.** Helped draft an assessment of efficiency potential from retrofitting of cold climate heat pumps into electrically heated multi-family buildings (2017).
- **Northeast Energy Efficiency Partnerships.** Helped manage Regional EM&V forum project estimating savings for emerging technologies, including field study of cold climate heat pumps. Led assessment of best practices on use of efficiency to defer T&D investment. (2009 to 2015)
- **Ontario Power Authority.** Managed jurisdictional scans on leveraging building efficiency labeling/disclosure requirements and non-energy benefits in cost-effectiveness screening. Supported staff workshop on the role efficiency can play in deferring T&D investments. Presented on efficiency trends for Advisory Council on Energy Efficiency. (2012-2015)
- **Vermont Public Interest Research Group.** Conducted comparative analysis of the economic and environmental impacts of fuel-switching from oil/propane heating to either natural gas or efficient, cold climate electric heat pumps. Filed regulatory testimony on findings. (2014-2015)
- **New Hampshire Electric Co-op.** Led assessment of the co-op's environmental and social responsibility programs' promotion of whole building efficiency retrofits, cold climate heat pumps and renewable energy systems. Presented recommendations to the co-op Board. (2014)
- **National Association of Regulatory Utility Commissioners (NARUC).** Assessed alternatives to 1st year savings goals to eliminate disincentives to invest in longer-lived savings. (2013)

- **California Investor-Owned Utility.** Senior advisor on EFG project to analyze 10 leading U.S. utility portfolios to determine if there are differences in the cost of saved energy related to utility spending in specific non-incentive categories, including administration, marketing, and EM&V. (2013)
- **DC Department of the Environment (Washington DC).** Part of VEIC team administering the DC Sustainable Energy Utility (SEU). Helped characterize the DC efficiency market and supporting the design of efficiency programs that the SEU will be implementing. (2011 to 2012)
- **Ohio Sierra Club.** Filed and defended expert witness testimony on the implications of not fully bidding all efficiency resources into the PJM capacity market. (2012)
- **Regulatory Assistance Project – Global.** Assisted RAP in framing several global research reports. Co-authored the first report – an extensive “best practices guide” on government policies for achieving energy efficiency objectives, drawing on experience with a variety of policy mechanism employed around the world. (2011)
- **Tennessee Valley Authority.** Assisted CSG team providing input to TVA on the redesign of its residential efficiency program portfolio to meet aggressive new five-year savings goals. (2010)
- **New York State Energy Research and Development Authority (NYSERDA).** Led residential & renewables portions of several statewide efficiency potential studies. (2001 to 2010)
- **Ohio Public Utilities Commission.** Senior Advisor to a project to develop a web-based Technical Reference Manual (TRM). The TRM includes deemed savings assumptions, deemed calculated savings algorithms and custom savings protocols. It was designed to serve as the basis for all electric and gas efficiency program savings claims in the state. (2009 to 2010)
- **Vermont Electric Power Company.** Led residential portion of efficiency potential study to assess alternatives to new transmission line. Testified before Public Service Board. (2001-2003)
- **Efficiency Vermont.** Served on Sr. Management team. Supported initial project start-up. Oversaw residential planning, input to regulators on evaluation, input to regional EM&V forum, development of M&V plan and other aspects of bidding efficiency into New England’s Forward Capacity Market (FCM), and development and updating of nation’s first TRM. (2000 to 2010)
- **Long Island Power Authority Clean Energy Plan.** Led team that designed the four major residential programs (three efficiency, one PV) incorporated into the plan in 1999. Oversaw extensive technical support to the implementation of those programs. This involved assistance with the development of goals and budgets, development of savings algorithms, cost-effectiveness screening, and on-going program design refinements. (1998 to 2009)

Selected Publications and Reports

- *National Standard Practice Manual for Benefit Cost Analysis of Distributed Energy Resources*, Second Edition, to be published December 2025 (with Tim Woolf and others)
- *New Jersey's Electric Grid Has Headroom to Electrify Heating in Over 1 Million Homes*, prepared for the Natural Resources Defense Council, February 27, 2025
- *A Comparison of Clean Heat Standards: Current Progress and Key Elements*, prepared for the Environmental Defense Fund, February 2024 (with Gabrielle Stebbins)
- *Maryland Building Decarbonization Pathways*, Final Report, September 1, 2023 (with Liz Bourguet)
- *Cost Savings and CO2 Emission Reductions of Residential Electrification in Peoples Gas Territory*, prepared for the Natural Resources Defense Council, November 2022 (with David Hill & Liz Bourguet)
- *Tip of the Spear: How Efficiency Programs Supporting Cold Climate Heat Pumps in Low Income Multi-Family Buildings Could Help Lay the Foundation for Building Decarbonization in Michigan and Illinois*, 2022 ACEEE Summer Study on Energy Efficiency in Buildings (with Laura Goldberg, Valeria Rincon and Samantha Williams)
- *The Clean Heat Standard*, Vermont Energy Action Network (EAN) White Paper, December 2021 (with Richard Cowart)
- *National Standard Practice Manual for Benefit Cost Analysis of Distributed Energy Resources*, August 2020, (with Tim Woolf and others)
- *Reducing CO₂ Emissions from Vermont Buildings: Potential and Cost-Effectiveness of Select Program Options*, Regulatory Assistance Project, February 13, 2019 (with Richard Faesy)
- *Pumping Energy Savings: Recommendations for Accelerating Heat Pump Adoption in Ontario's Electrically Heated Multi-Residential Buildings*, Toronto Atmospheric Fund, July 2018 (with Devon Calder, Brian Purcell and Judy Simon)
- *National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources*, Edition 1, Spring 2017 (with Tim Woolf, Marty Kushler, Steven Schiller and Tom Eckman)
- *The Next Quantum Leap in Efficiency: 30% Electricity Savings in 10 Years*, Proceedings of the 2016 ACEEE Summer Study on Energy Efficiency in Buildings, Volume 9, pp. 1-14 (with Jim Grevatt, Rich Sedano and Dave Farnsworth)
- *The Next Quantum Leap in Efficiency: 30% Electricity Savings in Ten Years*, published by the Regulatory Assistance Project, February 2016 (with Jim Grevatt)
- *Energy Efficiency as a T&D Resource: Lessons from Recent U.S. Efforts to Use Geographically Targeted Efficiency Programs to Defer T&D Investments*, published by Northeast Energy Efficiency Partnerships, January 9, 2015 (with Jim Grevatt)
- *Unleashing Energy Efficiency: The Best Way to Comply with EPA's Clean Power Plan*, Public Utilities Fortnightly, October 2014, pp. 30-38 (with Tim Woolf, Erin Malone and Robin LeBaron)

- *The Resource Value Framework: Reforming Energy Efficiency Cost-Effectiveness Screening*, published by the National Efficiency Screening Project, August 2014 (with Tim Woolf et al.)
- *U.S. Experience with Participation of Energy Efficiency in Electric Capacity Markets*, Regulatory Assistance Project, August 2014 (with Richard Cowart)
- *The Positive Effects of Energy Efficiency on the German Electricity Sector*, IEPEC 2014 Conference, September 2014 (with Friedrich Seefeldt et al.)
- *Final Report: Alternative Michigan Energy Savings Goals to Promote Longer Term Savings and Address Small Utility Challenges*, prepared for the Michigan Public Service Commission, September 13, 2013 (with Optimal Energy)
- *Energy Efficiency Feed-in-Tariffs: Key Policy and Design Considerations*, Proceedings of ECEEE 2013 Summer Study, pp 305-315 (with Richard Cowart)
- *Can Competition Accelerate Energy Savings? Options and Challenges for Efficiency Feed-in-Tariffs*, published in *Energy & Environment*, Volume 24, No. 1-2, February 2013 (with Richard Cowart)
- *An Energy Efficiency Feed-in-Tariff: Key Policy and Design Considerations*, published by the Regulatory Assistance Project, March/April 2012 (with Richard Cowart)
- *U.S. Experience with Efficiency as a Transmission and Distribution System Resource*, published by the Regulatory Assistance Project, February 2012 (with Rich Sedano)
- *Achieving Energy Efficiency: A Global Best Practices Guide on Government Policies*, published by the Regulatory Assistance Project, February 2012 (with Nancy Wasserman)
- *Residential Efficiency Retrofits: A Roadmap for the Future*, published by the Regulatory Assistance Project, May 2011 (with Meg Gottstein and Blair Hamilton)
- *Is it Time to Ditch the TRC?* Proceedings of ACEEE 2010 Summer Study on Energy Efficiency in Buildings, Volume 5 (with Marty Kushler)
- *Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, in *Energy Efficiency*, published on line 06 June 2010 (with Cheryl Jenkins and Shawn Enterline)
- *A Comparison of Energy Efficiency Programmes for Existing Homes in Eleven Countries*, prepared for the British Department of Energy and Climate Change, 19 February, 2010 (with Blair Hamilton et al.)
- *Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, Proceedings of the 2009 European Council on an Energy Efficient Economy Summer Study, pp. 175-183 (with Cheryl Jenkins and Shawn Enterline)
- *Playing with the Big Boys: Energy Efficiency as a Resource in the ISO New England Forward Capacity Market*, Proceedings of ACEEE 2008 Summer Study Conference on Energy Efficiency in Buildings, Volume 5 (with Cheryl Jenkins and Blair Hamilton)
- *Recommendations for Community-Based Energy Program Strategies, Final Report*, developed for the Energy Trust of Oregon, June 1, 2005 (with Dave Hewitt et al.)
- *Shareholder Incentives for Gas DSM: Experience with One Canadian Utility*, Proceedings of ACEEE 2004 Summer Study on Energy Efficiency in Buildings, Volume 5 (with Kai Millyard)

- *Cost Effective Contributions to New York's Greenhouse Gas Emission Reduction Targets from Energy Efficiency and Renewable Energy Resources*, ACEEE 2004 Summer Study Proceedings, Volume 8 (with David Hill et al.)
- *Opportunities for Accelerated Electric Energy Efficiency Potential in Quebec: 2005-2012*, prepared for Regroupement national des conseils regionaux de l'environnement du Quebec, Regroupement des organismes environnementaux energie and Regroupement pour la responsabilite sociale des entreprises, May 16, 2004 (with Eric Belliveau, John Plunkett and Phil Dunsky)
- *Review of Connecticut's Conservation and Load Management Administrator Performance, Plans and Incentives*, for Connecticut Office of Consumer Counsel, October 31, 2003 (with John Plunkett, Phil Mosenthal, Stuart Slote, Francis Wyatt, Bill Kallock and Paul Horowitz)
- *Energy Efficiency and Renewable Energy Resource Development Potential in New York State*, for New York Energy Research and Development Authority, August 2003 (with John Plunkett, Phil Mosenthal, Stave Nadel, Neal Elliott, David Hill and Christine Donovan)
- *Assessment of Economically Deliverable Transmission Capacity from Targeted Energy Efficiency Investments in the Inner and Metro-Area and Northwest and Northwest/Central Load Zones*, for Vermont Electric Power Company, Final Report: April 2003 (with John Plunkett et al.)
- *Residential HVAC Quality Installation: New Partnership Opportunities and Approaches*, Proceedings of ACEEE 2002 Summer Study Conference on Energy Efficiency in Buildings, Volume 6 (with Rebecca Foster, Mia South, George Edgar and Put Murphy)
- *A Modified Delphi Approach to Predict Market Transformation Program Effects*, Proceedings of ACEEE 2000 Summer Study Conference on Energy Efficiency in Buildings, Volume 6 (with Phil Mosenthal et al.)
- *Using Targeted Energy Efficiency Programs to Reduce Peak Electrical Demand and Address Electric System Reliability Problems*, published by the American Council for an Energy Efficient Economy, November 2000 (with Steve Nadel and Fred Gordon)
- *Energy Savings Potential from Addressing Residential Air Conditioner and Heat Pump Installation Problems*, American Council for an Energy Efficient Economy, February 1999 (with John Proctor and Steve Nadel)
- *Promoting High Efficiency Residential HVAC Equipment: Lessons Learned from Leading Utility Programs*, Proceedings of ACEEE 1998 Summer Study Conference on Energy Efficiency in Buildings, Volume 2 (with Jane Peters and Denise Rouleau)
- *PowerSaver Home Program Impact Evaluation*, report to Potomac Edison, February 1998 (with Andy Shapiro, Ken Tohinaka and Karl Goetze)
- *A Tale of Two States: Detailed Characterization of Residential New Construction Practices in Vermont and Iowa*, Proceedings of ACEEE 1996 Summer Study Conference on Energy Efficiency in Buildings, Volume 2 (with Blair Hamilton, Paul Erickson, Peter Lind and Todd Presson)

- *New Smart Protocols to Avoid Lost Opportunities and Maximize Impact of Residential Retrofit Programs*, in Proceedings of ACEEE 1994 Summer Study on Energy Efficiency in Buildings (with Blair Hamilton and Ken Tohinaka)
- *Economic Analysis of Woodchip Systems and Finding Capital to Pay for a Woodchip Heating System*, Chapters 6 and 8 in Woodchip Heating Systems: A Guide for Institutional and Commercial Biomass Installations, published by the Council of Northeastern Governors, July 1994
- *PSE&G Lost Opportunities Study: Current Residential Programs and Relationship to Lost Opportunities*, prepared for the PSE&G DSM Collaborative, June 1994 (with Blair Hamilton, Paul Berkowitz and Wayne DeForest)
- *PSE&G Lost Opportunities Study: Preliminary Residential Market Analysis*, prepared for the PSE&G DSM Collaborative, May 1994 (with Blair Hamilton, Paul Berkowitz and Wayne DeForest)
- *Long-Range Evaluation Plan for the Vermont Weatherization Assistance Program*, prepared for the Vermont Office of Economic Opportunity, February 1994 (with Blair Hamilton and Ken Tohinaka)
- *Impact Evaluation of the 1992-1993 Vermont Weatherization Assistance Program*, prepared for the Vermont Office of Economic Opportunity, December 1993 (with Blair Hamilton and Ken Tohinaka)
- *Electric Utilities and Long-Range Transport of Mercury and Other Toxic Air Pollutants*, published by the Center for Clean Air Policy, 1991
- *Coal and Emerging Energy and Environmental Policy*, in Natural Resources and Environment, 1991 (with Don Crane)
- *Acid Rain: The Problem*, in EPA Journal, January/February 1991 (with Ned Helme)
- *An Efficient Approach to Reducing Acid Rain: The Environmental Benefits of Energy Conservation*, published by the Center for Clean Air Policy, 1989
- *The Untold Story: The Silver Lining for West Virginia in Acid Rain Control*, published by the Center for Clean Air Policy, 1988
- *Midwest Coal by Wire: Addressing Regional Energy and Acid Rain Problems*, published by the Center for Clean Air Policy, 1987
- *Acid Rain: Road to a Middle Ground Solution*, published by the Center for Clean Air Policy, 1987 (with Ned Helme)