

1 **Q. Re: Wilson Pre-Filed Testimony. At various places (such as page 3, end of**
2 **first paragraph), the testimony indicates "As discussed in the Report, we**
3 **disagree with these arguments." [underlining added]**
4

5 **Please indicate if any authors or contributors, other than Dr.**
6 **John W. Wilson, are responsible for the Wilson report and will**
7 **be testifying to its conclusions. Please provide curriculum vitae**
8 **for all other authors and contributors.**
9

10
11 **A. Dr. Roger Rodriguez assisted Dr. Wilson in preparing the Report. Dr. Wilson is**
12 **responsible for the Report and its conclusions, and he will be the only witness**
13 **testifying. Dr. Rodriguez's resume is provided as attachment IC-PUB-003.**

Dr. Roger Roberto Rodríguez

EDUCATION

Ph.D. Economics (1995) University of Virginia, Charlottesville, VA.

M.A. Economics (1992) University of Virginia, Charlottesville, VA.

B.S. Electrical Engineering (1986)
Ingeniero Electricista Industrial, Universidad Nacional Autónoma de Honduras (National Autonomous University of Honduras), Tegucigalpa, Honduras.

PROFESSIONAL EXPERIENCE

2000-Present Economist
J.W. Wilson & Associates, Inc.
Washington, D.C.

Duties: Dr. Rodriguez provides technical and economic assistance on matters relating to regulatory, antitrust, and other legal proceedings involving electric utilities, telecommunications, gas, as well as non-regulated industries. His specific duties include analyzing and constructing cost of service studies for regulatory proceedings and producing market analyses to determine antitrust market boundaries.

1998 National Consultant
Unidad de Apoyo Tecnico, Ministry of the Presidency
Tegucigalpa, Honduras

Duties: Dr. Rodriguez was part of the team that prepared in La Paz, Bolivia (with assistance from Debt Relief International) the Honduras Debt Relief Strategy under the HIPC Initiative. He was also part of the team responsible for preparing the Master Reconstruction Plan for Honduras following Hurricane Mitch and the Infrastructure Sector on all work related to the Country's "Evaluation Damages caused by Hurricane Mitch." In addition, Dr. Rodriguez was responsible for the

Macroeconomic Model for Honduras based on The World Bank's "Revised Minimum Standard Model" (RMSM). The RMSM is used to evaluate public investment programs, macroeconomic policies and structural reforms. Dr. Rodriguez's other duties included preparing a bi-monthly publication entitled "Análisis de Coyuntura Económica y Social" which reported macroeconomic indicators with a brief analysis. He also supported and worked on several projects and analyses requested by the Minister of the Presidency.

1995-1997 Economist
J.W. Wilson & Associates, Inc.
 Washington, D.C.

Duties: Dr. Rodriguez prepared technical reports and analyses on a wide range of economic issues (e.g., valuing the bond issue which funded the Denver International Airport). He prepared feasibility studies for municipalization of distribution systems and an analysis of the economic impact of gasoline tariffs. Dr. Rodriguez also provided econometric and analytical support in the areas of public utility regulation, and assistance on collecting, analyzing and interpreting data for industry studies. This assistance included analysis of financial statements, cost of capital determination, cost of service/rate design, and forecasting. In addition, he assisted in the preparation of expert testimony and supporting material relating to regulatory, antitrust, and other proceedings on matters relating to electric utility, telecommunications and non-regulated industries. He also advised on economic and engineering issues regarding electric utilities.

CONSULTANT POSITIONS

Dr. Rodriguez returned to Honduras in 1997 to fulfill temporary post-graduate employment obligations. While in Honduras he was a consultant for several organizations. His consultant experience is presented below.

- 1998 Strategist Advisor
Celaque Cigar Company
Tegucigalpa, Honduras
- Duties: Dr. Rodriguez provided assistance in designing strategies for the commercialization of "Don Jorge" Cigars to markets in the United States, Canada, New Zealand, Spain and other countries. In addition, he provided financial advice on pricing and promotional packages, and designed and maintained the Company's website.
- 1998 Assistant Consultant
Mendieta y Asociados
Tegucigalpa, Honduras
- Duties: Dr. Rodriguez worked jointly with Dr. Dante Mossi to prepare a feasibility study for the acquisition of medical services by La Cooperativa de Ahorro y Credito "Sagrada Familia" Ltda., at the lowest cost to its affiliates. Drs. Rodriguez and Mossi performed a market study consisting of a survey of affiliates and an analysis of the needs and services demanded by affiliates. The Drs. also performed an analysis of alternatives regarding the hospital, private medical insurance, the medical insurance system and the partnership with the existing hospital network. The Drs. prepared a Final Report with recommendations for this project.
- 1998 Economic Consultant
J.W. Wilson & Associates, Inc.
Tegucigalpa, Honduras
- Duties: Dr. Rodriguez represented the firm before the National Telecommunication Commission (CONATEL). The firm has been approved to provide consulting services relating to the development of the Organizational Component of CONATEL (IBD Project ATN/MT-5234-HO).

1997 Technical Advisor for Regionalization of Distribution Systems in Honduras
Comision Nacional De Enerigia Electrica
 Tegucigalpa, Honduras

Duties: Dr. Rodriguez reviewed financial analyses in order to assess profitability of each of the proposed regions presented by the National Electric Utility. He also prepared a final report for the regionalization of Distribution Systems in Honduras and presented the report to the Economic Cabinet. In addition, Dr. Rodriguez prepared reference terms to request international consulting services related to calculating added value distribution and automatic tariff adjustments.

ENGINEERING POSITION

1986-1990 Engineer, Electromechanical Engineering Division
Empresa Nacional de Energía Eléctrica (National Electric Power Company)
 Tegucigalpa, Honduras

Duties: Dr. Rodriguez prepared contractual documents and technical specifications for the acquisition of electrical equipment for generation centers, sub-stations, and distribution systems. He also evaluated bid documents according to economic and technical criteria, and analyzed electrical systems using technical software for system improvement such as load flow, voltage regulation and short circuits. In addition, he participated in a team that replaced telecommunication equipment in substations, installed teleprotection equipment at "El Nispero" Hydroelectric Generating Plant, and designed and supervised the installation of the electric system and distribution grid for a wood-fueled generator in the community of "El Chagüite Grande," Comayagua, Honduras.

PROFESSIONAL EXPERIENCE

Application of the Montana Power Company for Approval of the Default Supply Portfolio, and the Projected Electric Cost Tracking for the 12-Month Period Beginning July 1, 2002. Docket NO. D2001.10.144(2002) provided technical assistance in analysis for testimony regarding regulatory and economic issues concerning the Montana Power Company's ("MPC's") selection of a default supply portfolio.

Brazos Electric Power Cooperative, Inc. vs. Tenaska IV Texas Partners, Ltd. Commercial Arbitration No. 71 198 00323 01 (2004) provided technical assistance in analysis to address the economic damages incurred by Brazos resulting from breaches of the Purchase Power Agreement ("PPA") as a consequence of the change of control over the TIVTP Project Company for the Cleburne electric generating plant and related matters.

Upper Missouri Generation & Transmission Electric Cooperative, Inc. vs. West Plains Electric Cooperative, Inc. No. CV-03-129-BLG-RWA (2004) provided technical assistance in analysis for Supplemental damages Report addressing related matters arising from the Plaintiff's discovery documents and West Plains' economic damages associated with any loss of the benefit of its WAPA allocation that occurred as a result of the termination of its membership in Upper Missouri or its associated electric power supply arrangement.

Provided technical analysis for Newfoundland and Labrador Hydro's General Rate Application for approvals of, under Section 70 of the *Act*, changes in the rates to be charged for the supply of power and energy to Newfoundland Power Inc ("NP"). (2003)

Georgia Power Company Filing Pursuant to Docket No. 14000-U Docket No. 18300 - U (2004) provided technical assistance in analysis in addressing issues concerning Georgia Power Company's cost allocations and proposed rate design.

Application of NorthWestern Energy to Establish Increased Natural Gas and Electric Service Rates. Phase II. Docket No. D2007.7.82. (2008), provided technical assistance in the analysis of rate of return, cost allocation and proposed rate design.

Application of Montana-Dakota Utilities Co., to Establish Increased Rates for Electric Service. Docket No. D2010.8.82, (2010), provided technical assistance in the analysis of rate of return, cost allocation and proposed rate design.

PPL Electric Utilities Corporation Docket No. ER-00-1712-003 (2003) provided technical analysis for the Montana Consumer Counsel ("MCC") to address PPL Electric's claim that its filing of July 22, 2003 demonstrates that PPL Electric and its affiliates do not exercise generation market power, lack the ability to manipulate access to transmission facilities which they own or control, and cannot erect or control any other barriers to market entry.

Application of PG Energy Inc. for Approval to Increase Gas Utility Revenues and Modifications to Existing Rate Design and Tariffs for Gas Utility Service in Pennsylvania. Docket No. R-00963612 (1996); provided technical assistance in analysis of cost of service and rate design for gas

service that supported preparation of expert testimony on behalf of The Proctor & Gamble Paper Products Company.

Montana Power Company: Revenue Requirements, Gas Cost, Allocated Cost of Service and Rate Design for Natural Gas Service, Restructuring and Consolidation of Related Class and Issues, Docket No. D96.2.22 (1996); provided technical assistance in analysis of cost of service and rate design that supported preparation of expert economic findings.

Application of Potomac Electric Power Company and Baltimore Gas & Electric Company for Approval to Merge, Public service Commission of the District of Columbia, Formal Case No. 951 and Federal Energy Regulatory Commission Docket No. EC85-10-000 (1996); provided technical support on economic issues relating to market share analysis that supported the preparation of expert economic findings.

Towns and Villages of Postdam and Canton, NY, (1996); provided technical support in preparing aspects of Municipal Power Feasibility Study for municipalization of their distribution systems, focusing on calculation of condemnation value, using several approaches.

Natural Gas Retail Tariff Data Base; analysis, study and preparation, for marketing purposes, of a Data Base of Gas tariffs of a large set of companies in the U.S.

Preparation of a technical analysis for the Valuation of Bond Issuing in the Denver International Airport, (1996).

Wisconsin Electric Power Co. and Northern States Power Co., Federal Energy Regulatory Commission, Docket No. EC95-16-000 (1995-6); provided technical support on economic issues for the preparation of expert economic findings.

Proposed Revisions to Connecticut General Statutes Section 16-19b, Fully Tracking Energy Adjustment Clause, Docket No. 95-07-05 (1995); analyzed the substitution of the fuel adjustment clause and generation utilization adjustment clause for one comprehensive energy clause.

ACADEMIC EXPERIENCE AND HONORS

University of Virginia

Research Assistant at the Darden Graduate School of Business Administration; organized supporting material for case studies in coursework and assisted in research related to financial markets, 1994.

Teaching and Research Assistant at the Department of Economics; led three weekly discussion sections of approximately twenty students and responsible for the grading of these students. Courses: Principles of Microeconomics and Intermediate Microeconomics, 1994.

Research Assistant at the Department of Economics; extensive programming in Pascal and Quattro Pro for experiments in economics, and provided Fortran programming and econometrics software support for several research projects conducted by faculty members, 1992-1994.

Graduate Honors

University of Virginia - Academic Enhancement Fellowship (1992-1995).
LASPAU-USAID Fellowship (1990-1992).

PAPERS AND PRESENTATIONS

"Electric Utility Efficiency with Independent Power Producers," with Roger Sherman, in Michael A. Crew (ed.), *Pricing and Regulatory Innovations Under Increasing Competition*, Boston: Kluwer Academic Publishers, 1996.

"The Buying Option for Electric Utilities: New Regulatory Policies in Electricity Generation," University of Virginia, mimeo, November 1994. (Ph.D. Dissertation)

"Design of a Microprocessor-based Call Counter to be Used in Remote Stations," research sponsored by the Honduran National Telecommunication Company. (Undergraduate Thesis)

"Cross-Cultural Evidence on Gender Differences in Bargaining Behavior," with Lisa R. Anderson and Yana V. Rodgers, College of William & Mary, work submitted to AER Papers and Proceedings. This paper will report experiments at Universities in the United States and Honduras.

OTHER INFORMATION

Fluent in English and Spanish (native).