

# Larry Blank

[Larryb@nmsu.edu](mailto:Larryb@nmsu.edu)

## Vitae

### Education

Ph.D. in Economics, The University of Tennessee, Knoxville, August 1994.

Dissertation: “Political Economy and Public Utility Inefficiency.”

B.S. in Economics/Mathematics, Minnesota State University, Bemidji, Minnesota, May 1989.

### Fields of Concentration

Industrial Organization & Public Policy  
Econometrics  
Finance (ABD)

### Professional Experience

**Associate Professor of Economics**, Department of Economics, Applied Statistics, & International Business, New Mexico State University (NMSU), August 2009 – Present. Teaching includes graduate-level public utility regulation (water, natural gas, and electricity), business and government, antitrust policy/economics, economic statistics, and microeconomics.

#### Typical Allocation of Effort:

10% Outreach

10% Service

30% Scholarly activity

50% Teaching (3-2 teaching load with over 800 SCHs per year)

#### Evidence of Teaching Effectiveness attached.

**Associate Director**, Center for Public Utilities, NMSU, January 2011 – Present. Electric Utility and Natural Gas Distribution ratemaking training. The Center’s training is endorsed by the National Association of Regulatory Utility Commissioners (NARUC). NMSU Outreach activity.

**Senior Associate**, Center for Public Utilities, NMSU, August 2003 – December 2010. NMSU Outreach activity.

**Assistant Professor of Economics**, Department of Economics & International Business, New Mexico State University (NMSU), August 2003 – August 2009.

**Principal Consultant**, TAHOEconomics, LLC, August 1999 - Present. Clients have included Government Agencies, Utility Customers, and Utility Companies focusing on most aspects of

regulatory policy development and rate regulation for public utilities in the water, natural gas, electricity, and telecommunications industries. From Jan. 2002 – Jan. 2005, Dr. Blank also served as the Director of a US Department of Energy grant project assisting the newly formed Energy Regulatory Commission of the Philippines as that agency completely restructured national policy related to the regulation of the electricity industry.

**Manager of Regulatory Policy and Market Analysis**, Regulatory Operations Staff, Public Utilities Commission of Nevada, October 1997 - August 1999.

Responsibilities: Directed a ten-person division with duties covering most aspects of utility regulation and competitive restructuring across all industries (primarily telecommunications, electric, and natural gas); implementation of the Telecommunications Act of 1996; division management of all rates and tariffs; lead management of staff's electric and natural gas restructuring activities. Close coordination with legal division in litigated case preparation including lead negotiation experience.

**Supervising Economist**, Regulatory Operations Staff, Public Service Commission of Nevada, March 1996 - October 1997. Duties similar to those above.

**Research Economist**, National Regulatory Research Institute, The Ohio State University and the National Association of Regulatory Utility Commissioners (NARUC), September 1994 - March 1996.

**Lecturer**, School of Public Policy and Management, The Ohio State University (taught Graduate Public Finance).

### **Recent University Service**

**Chair, Faculty Council, College of Business, Aug. 2015-present.**

**Vice-Chair, NMSU Faculty Senate, May 2014 – May 2015.**

**Chair, NMSU Faculty Senate Leadership Committee, May 2014 – May 2015.**

**Chair, NMSU Faculty Senate Government Affairs Committee, August 2013 – May 2015.**

**Voting member of the Associate Deans Advisory Committee (ADAC), May 2014 – May 2015.**

**Chair, College of Business Faculty Council, September 2015 – May 2016.**

**Member of an NMSU Presidential Task Force on *Transforming NMSU into a 21<sup>st</sup> Century University*, August 2015 – present.**

**Member, College of Business Undergraduate Committee, August 2013 – May 2014.**

## Published Peer-Reviewed Articles and Selected Reports

1. **“An Enhanced Two-Part Tariff Methodology When Demand Charges Are Not Used,”** (with Doug Gegax). *The Electricity Journal*, Volume 29, No. 3 (2016).
2. **“Residential Winners and Losers behind the Energy vs. Customer Charge Debate,”** (with Doug Gegax). *The Electricity Journal*, Vol. 27, No. 4 (2014), pp. 31-39.
3. **“Benchmarking Electric Distribution Utilities in the Philippines,”** (with Doug Gegax and Ben Widner). *Asian Social Science*, Vol. 8, No. 3 (2012).
4. **“Objectively Designing Shared Savings Incentive Mechanisms: An Opportunity Cost Model for Electric Utility Efficiency Programs,”** (with Doug Gegax). *The Electricity Journal*, Vol. 24, No. 9 (2011), pp. 31-40.
5. **“Endogenous Regulatory Constraints and The Emergence of Hybrid Regulation,”** (with John Mayo). *Review of Industrial Organization*, Vol. 35 (2009), pp. 233-255.
6. **“Promotions as Coopetition in the Soft Drink Industry,”** (with Mike Hyman and Michael Meade). *Academy of Marketing Studies Journal*, September, 2009.
7. **“A Dynamic Model of Insurgency: The Case of the War in Iraq,”** (with C.E. Enomoto, D. Gegax, T. McGuckin, and C. Simmons), *Peace Economics, Peace Science and Public Policy*, Vol. 14, No. 2, 2008.
8. **“The Role of Regulation in Expanding Access to Electricity: Reform in the Philippines,”** (with Mk Shean), *Energy Update*, Issue No. 4, 2005.
9. **"Open Entry and Local Telephone Rates: The Economics of IntraLATA Toll Competition,"** (with David Kaserman, John Mayo, and Simran Kahai), *Review of Industrial Organization*, Vol. 14, No. 4, June 2000, pp. 303-319.
10. **"Dominant Firm Pricing with Competitive Entry and Regulation: The Case of IntraLATA Toll,"** (with David Kaserman and John Mayo), *Journal of Regulatory Economics*, Vol. 14, 1998, pp. 35-53.
11. **"Concavity Assumptions in Regulatory Models and the Capital Waste Controversy,"** *Journal of Regulatory Economics*, Vol. 9, 1996, pp. 95-100.
12. **"Key Antitrust Pricing Issues for Regulated Industries with Emerging Competition,"** *NRRI Quarterly Bulletin*, Vol. 17, No. 2, 1996, pp. 279-298.

13. "Telephone Vouchers: Experiences in Other Markets," *NRRI Quarterly Bulletin*, Vol. 16, No. 4, 1995, pp. 537-547.

### **Selected Reports:**

*Telecommunications Service Quality* (with V.W. Davis, D. Landsbergen, R.W. Lawton, N. Zearfoss, and J. Hoag), National Regulatory Research Institute, The Ohio State University, Columbus, March 1996.

*Telecommunication Infrastructure Investments and State Regulatory Reform: A Preliminary Look at the Data* (with Vivian Davis and Catherine Reed), The National Regulatory Research Institute, The Ohio State University, Columbus, December 1994.

*Considerations in Preparing and Reviewing Socioeconomic Impact Assessments for Low-Level Waste Disposal Facilities* (with Mary English, Matthew Murray, and Zoe Hoyle), for the U.S. Department of Energy. National Low-Level Waste Management Program, EG&G Idaho, Inc., Idaho Falls, Idaho: August 1992.

*Economic Impact of Chem-Nuclear Systems, Inc. on Barnwell County, South Carolina* (with Matthew Murray), for the U.S. Department of Energy. Energy, Environment and Resources Center, The University of Tennessee, Knoxville, November 1990.

Gegax, D. A., Blank, L. R. "An Analysis of Reclassifying Residential Electric Utility Customers with On-Site Small Solar PV Facilities: The Case of El Paso Electric," Technical Report for the New Mexico Attorney General (August, 2015)

Blank, L., and Gegax, D.A., "Estimated Net Employment Impacts due to changes in Electric Cost Allocation between Rate Classes," Technical Report for the Hospitals and Higher Education Group in Arkansas (November 2015).

### **Working Papers**

"The FERC's Vintage and Original Purpose Doctrine for Transmission Pricing: Distorted Economics and Economic Distortions," (with Doug Gegax). Revised and resubmitted to *Utilities Policy*.

"Can Regulators Stop the Tax Bleeding of Universal Service Support?" (with Bill Smith and Lucinda Blume).

"Utility Cost Allocation and Estimated Employment Impacts," (with D. Gegax and C. Erickson).

### **Journal Referee / Book Reviews**

*Elsevier*, Provided prospectus book review of “The Fair Return: Risk and Return for Rate-regulated Industries,” February 2016 (recommended publication with revisions).

*Development Policy Review*, Journal Referee, April 2012 (recommended revise and resubmit).

*Peace Economics, Peace Science and Public Policy*, Journal Referee, July 2011 (recommended revise and resubmit).

*The American Economic Review*, Journal Referee, April 1995 (recommended rejection).

## **Grants**

U.S. Department of Energy, Technical Assistance to the Energy Regulatory Commission of the Philippines, January 2002 – January 2005.

U.S. Department of Energy, Sustainable Energy Development Program (Philippines), January 2005 – August 2005. Completed the Open Access Distribution Service Rules governing 140 electric distribution utilities.

## **Presentations and Conference Participation**

**“Overview of Electric Ratemaking Basics,”** *Edison Electric Institute Electric Advanced Rates Course*, University of Wisconsin, every July, 2011-15.

**“Statistically Determining Proper Recovery of Demand-Related Costs through the Energy Charge,”** and Discussant: *CRRRI University Advanced Workshop in Regulation and Competition*, Monterey, CA, June 2013.

**“The FERC’s Vintage and Original Purpose Doctrine for Transmission Pricing: Distorted Economics and Economic Distortions,”** and Discussant: *CRRRI University Advanced Workshop in Regulation and Competition*, Monterey, CA, June 2012.

**“Objectively Designing Shared Savings Incentive Mechanisms: An Opportunity Cost Model for Electric Utility Efficiency Programs,”** and Discussant: *CRRRI Rutgers University Advanced Workshop in Regulation and Competition*, Sky Top, PA, May 2011.

Presentation: **“Can Regulators Stop the Tax Bleeding of the Universal Service Fund?”** and Discussant: *CRRRI Rutgers University Advanced Workshop in Regulation and Competition*, Sky Top, PA, May 2008.

Presentation: **“Endogenous Regulatory Constraints and the Emergence of Hybrid Regulation,”** *Western Economic Association Meetings*, Seattle, WA, July 2007.

Presentation: **“PUHCA Uncertainty...States,”** *Western Governors’ Association Energy Summit*,

Albuquerque, NM, April 15, 2004.

Discussant, *Advanced Workshop in Regulation and Competition*, Monterey, CA, July 6, 2000.

Presentation: "**Nevada Electric Restructuring**," *Western Risk Management & Claims Workshop*, Western Electric Power Institute, San Diego, CA, July 8, 1999.

Discussant, *Advanced Workshop in Regulation and Competition*, San Diego, CA, July 7-9, 1999.

Participant, *Danish Ministry Workshop on Telecommunications Interconnection*, Special invitation by the Danish Ministry of Research and Information Technology, London, UK, December 14-15, 1998.

Presentation: "**Regulatory Choice: Constraints and Inefficiency**," *Advanced Workshop in Regulation and Competition*, Monterey, CA, July 10, 1998.

Presentation: "**Regulatory Choice: Constraints and Inefficiency**," *The 73rd Annual Western Economic Association Conference*, June 29, 1998.

Discussant, *The 25th Annual Telecommunications Policy Research Conference (TPRC)*, Alexandria, VA, September 27-29, 1997.

Presentation: "**Electricity Restructuring Issues**," two presentations before the *Nevada State Senate Committee on Commerce and Labor*, February 1997.

Presentation: "**Regulating Market Penetration: A Higher-Powered Incentive Scheme for Local Exchange Companies**," *The Tenth NARUC Biennial Regulatory Information Conference*, Hosted by the National Regulatory Research Institute at The Ohio State University, Columbus, September 11, 1996.

Presentation: "**Regulating Market Penetration: A Higher-Powered Incentive Scheme for Local Telephone Companies**," *The Advanced Workshop in Regulation and Public Utility Economics*, Hosted by the Center for Research in Regulated Industries at Rutgers University, Lake George, NY, May 30, 1996.

Presentation: "**Balancing Seemingly Conflicting Goals through a Minimum Subscribership Plan: Economic Efficiency and the Risks Borne by Regulators**," *The 27th Annual Conference of the Institute of Public Utilities*, Williamsburg, VA, December 12, 1995.

Presentation: "**The Minimum Subscribership Plan (MSP): Quality, Prices, and Current Policy**," *The 23rd Annual Telecommunications Policy Research Conference (TPRC)*, Solomons, MD, October 2, 1995.

Presentation: "**A Positive Theory of Price-Cap and Rate-of-Return Regulation: Substitutes or**

**Complements?"** *Southern Economic Association Meetings*, Orlando, FL, November 22, 1994.

## **Litigated Case Participation**

### ***Electricity:***

AK RCA, Docket No. U-13-184, "In the Matter of the Tariff Revision Designated as TA332-121 Filed by the Municipality of Anchorage D/B/A Municipal Light and Power Department." Expert witness testimony on behalf of the Federal Executive Agencies, May 2014.

AK RCA, Docket No. U-13-006, "In the Matter of the Tariff Revision Designated as TA326-121 Filed by the Municipality of Anchorage D/B/A Municipal Light and Power Department." Expert witness testimony on behalf of the Federal Executive Agencies, October 2013.

AR PSC, Docket No. 13-028-U, "In the matter of the application of Entergy Arkansas, Inc. for approval of changes in rates for retail electric service," expert witness testimony on behalf of Hospitals and Higher Education Group, August 2013.

AZ ACC, Docket No. E-01345A-11-0224, "In the matter of the application of Arizona Public Service Company for a hearing to determine the fair value of the utility property of the company for ratemaking purposes, to fix a just and reasonable rate of return thereon, to approve rate schedules designed to develop such return," expert witness testimony on behalf of the Federal Executive Agencies, January 2012.

NM PRC, Case No. 11-00265-UT, "In the matter of Public Service Company of NM's Renewable Energy Portfolio Procurement Plan for 2012," direct and rebuttal testimony on renewable cost threshold and related matters, on behalf of Public Service Company of New Mexico, October 2011.

AK RCA, Docket No. U-10-31, "In the Matter of the Revenue Requirement and Cost-of-Service Studies Designated as TA304-121 and the Tariff Filing Designated as TA306-121 and TA309-121 Filed by the MUNICIPALITY OF ANCHORAGE D/B/A MUNICIPAL LIGHT AND POWER," expert witness testimony on behalf of the Federal Executive Agencies, prepared December 2010.

AR PSC, Docket No. 08-137-U, "In the Matter of the Consideration of Innovative Approaches to Ratebase Rate of Return Ratemaking Including, but not Limited to, Annual Earnings Reviews, Formula Rates, and Incentive Rates for Jurisdictional Electric and Natural Gas Utilities," expert witness testimony responding to the mechanisms related to this docket, 2010.

CO PSC, Docket No. 10M-245E, "In the Matter of Commission Consideration of Public Service Company of Colorado Plan in Compliance with House Bill 10-1365, 'Clean Air-Clean Jobs Act'," expert witness testimony responding to the fundamental ratemaking issues regarding compliance with the Clean Air-Clean Jobs Act, September 2010.

AR PSC, Docket No. 09-084-U, “In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service,” expert witness testimony responding to certain aspects of revenue requirement, cost-of-service, and rate design. Also, responding to the proposed Formula Rate Plan, Lost Contributions to Fixed Costs, and the Shared Savings mechanism, 2010.

CO PSC, Docket No. 09AL-299E, “In the Matter of Advice Letter No. 1535 by Public Service Company of Colorado to Revise Its Colorado PUC No. 7 Electric Tariff to Reflect Revised Rates and Rate Schedules to be Effective on June 5, 2009,” expert witness testimony responding to the Phase II issues contained in the revised rate design on behalf of the Federal Executive Agencies, December 2009.

CO PSC, Docket No. 09AL-299E, “In the Matter of Advice Letter No. 1535 by Public Service Company of Colorado to Revise Its Colorado PUC No. 7 Electric Tariff to Reflect Revised Rates and Rate Schedules to be Effective on June 5, 2009,” expert witness testimony responding to the Phase I issues contained in the proposed revenue requirements on behalf of the Federal Executive Agencies, September 2009.

NV PUC, Docket No. 08-12002, “Application of Nevada Power Company for authority to increase its annual revenue requirement for general rates charged to all classes of customers to recover costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, environmental retrofits, and other generating, transmission, and distribution plant additions; to reflect changes in cost of service; and for relief properly related thereto,” expert witness testimony responding to certain aspects of the cost of service and rate design on behalf of The Board of Regents of the Nevada System of Higher Education, April 2009.

AZ ACC, Docket No. E-01345A-08-0172, “In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of the Utility Property of the Company for Ratemaking Purposes, to Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return,” expert witness testimony responding to certain aspects of the cost of service and rate design on behalf of the Federal Executive Agencies, January 2009.

FERC, Docket No. EL07-101-000, expert witness testimony assessing transmission rate design on behalf of American Electric Power Service Corporation, August 2007.

MD PSC, Case No. 9092, “In the Matter of the Application of PEPCO for Authority to Revise Rates,” conducted training and provided advisory services to the Maryland Commissioners and advisory staff (2007).

AR PSC, Docket No. 06-101-U, “In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service,” expert witness surrebuttal testimony responding to the cost of service study used by EAI, Staff, and interveners on behalf of the Federal



Executive Agencies, March 2007.

Vermont Department of Public Service, Cost of Service analysis related to Green Mountain Power Corp.

Philippines ERC, design of Open Access Distribution Services Rules, 2005.

Philippines Energy Regulatory Commission, Project Director and key advisor for over three years on policy development related to industry restructuring and over 140 rate unbundling cases, 2001-2005.

Philippines Department of Energy and Energy Regulatory Board, Electricity Ratemaking Training and Rulemaking for Restructured Wholesale and Retail Electricity Industry (July 2000 – February 2001).

TX PUC, Docket No. 22349, Application of TX-NM Power Company for approval of unbundled cost of service rates (testimony filed). 1999-2000.

NV PUC, Docket No. 99-10049, Petition for Advisory Opinion, Rules that may or may not apply to master-metered mobile home parks after restructuring of electric and natural gas markets, (testimony), 1999.

NV PUC, Docket No. 99-4019, Utility.com, Inc., Application for Licensing as an Alternative Seller (testimony), 1999.

NV PUC, Docket No.s 98-12007 and 12009, Sierra Pacific Power Co. And Nevada Power Co. Applications for authorization to provide potentially competitive services through affiliates (testimony), 1998.

NV PUC, Docket No. 98-7023, Sierra Pacific Power Company and Nevada Power Company, Joint Application for Approval of Merger (testimony), 1998.

NV PUC, Docket No. 98-9038, Regulatory Operations Staff, Application to Designate Unbundled Services as Potentially Competitive (testimony), 1998.

NV PUC, Docket No. 98-8034, Nevada Power Company, Application to Designate Unbundled Services as Potentially Competitive (testimony), 1998.

NV PUC, Docket No. 97-10004, Nevada Power Company's Green Power Tariff (testimony), 1997.

NV PUC, Docket Nos. 97-11018 and 97-11028, Proposed Unbundling Methodologies of Sierra Pacific Power Co. and Nevada Power Co. (testimonies), 1997.

NV PUC, Docket No. 97-8001, Investigation of issues to be considered as a result of restructuring of

electric industry (extensive comments and testimony on all restructuring issues including the development of new regulations), 1997 - 1999.

NV PUC, Docket No. 97-6008, Nevada Power Company's Resource Plan (evaluation of load forecasting), 1997.

NV PUC, Docket No. 97-5034, Rulemaking to establish standards of conduct and related requirements for distribution companies and affiliates, 1997.

NV PUC, Docket No. 96-7020, Nevada Power Company Deferred Energy Case (testimony), 1996.

NV PUC, Docket No. 96-6013 and 96-6014, Sierra Pacific Power Company tariff filing to allow negotiated contracts (testimony), 1996.

NV PUC, Docket No. 95-9022, Nevada Electric Restructuring Investigation (several extensive comments), 1996.

***Natural Gas and Water Distribution:***

AR PSC, Docket No. 13-079-U, "In the Matter of the Application of SourceGas Arkansas Inc. for Approval of a General Change in Rates." Expert witness testimony on behalf of the Hospitals and Higher Education Group, May 2014.

NV PUC, Docket No. 12-11010, "Investigation and rulemaking to address a recovery mechanism for the accelerated replacement of gas infrastructure." Expert witness testimony on behalf of the Federal Executive Agencies, December 2012.

NM PRC, Case No. 11-00196-UT, "In the matter of the petition by New Mexico-American Water Co. for adjustment of water rates for its Clovis District." Expert witness testimony on behalf of the City of Clovis, November 2011.

NM PRC, Case Nos. 11-00085-UT and 11-00293-UT, Acquisition and financing of NM American Water Co. by EPCOR, Inc. Expert witness testimony on financing and customer hold-harmless on behalf of the City of Clovis, July-August 2011.

NM PRC, Case No. 08-00134-UT, "In the Matter of the Petition by New Mexico-American Water Company, Inc. for Adjustment of Water Rates for Its Clovis District," expert witness testimony responding to revenue requirements and rate design in the petition to adjust water rates on behalf of the City of Clovis, December 2008.

NM PRC, Case No. 08-00321-UT, "In the Matter of the Petition by New Mexico-American Water Company, Inc. for a Certificate of Convenience and Necessity and Other Authorizations Related to an Exploratory Test Well into the Lower Dockum Formation to Serve the Clovis District," expert

witness testimony assessing accounting and regulatory treatment of the project costs associated with the proposed exploratory test well into the lower Dockum Formation to serve the Clovis district of New Mexico-American Water Company, Inc. (“NMAW” or “Company”) on behalf of the City of Clovis, March 2009.

NV PUC, Docket No. 97-8002, Investigation into alternative forms of regulation for natural gas local distribution companies and alternative sellers of natural gas, and related matters (extensive comments and testimony on all restructuring issues including the development of new regulations), 1997.

NV PUC, Docket No. 97-5034, Rulemaking to establish standards of conduct and related requirements for distribution companies and affiliates, 1997.

***Telecommunications:***

MT PSC, Docket No. D2005.6.105, Investigation on Use of Federal Universal Service Funds (testimony filed on behalf of PSC advocacy staff), 2005.

NM PRC, Case No. 05-00094-UT, Qwest Corporation’s Amended Alternative Form of Regulation Plan, (testimony filed on behalf of Qwest regarding computation and appropriateness of refund), 2005.

*Line Extension Policy and Contribution in Aid of Construction*, expert witness work on behalf of 3 Rivers Telephone Cooperative, before the Montana Eighteenth Judicial District Court, Cause No. DV-04-731, March 2006.

NV PUC, Docket No. 00-7012, Nevada Bell Petition for order commencing a proceeding to determine new costs and rates for unbundled network elements (testimony filed on behalf of wholesale customers), 2000.

FCC CC Docket No. 00-247, Petition for Arbitration, Developed Unbundled Costs and Interconnection Agreement on behalf of Virtual Hipster Corp., December 2000.

Case No. CV771923, Superior Court of the State of California (Santa Clara), Worldcom v. Co-net Communications, Oral Expert Witness Testimony on potential service development including cost and revenue estimates, damage estimate, standard of care in circuit disconnect, and other circuit contractual issues (deposition and oral testimony), April 2000.

NV PUC, Docket Nos. 98-10015 and 99-11007, Nevada Bell Arbitrations on the issue of reciprocal compensation and Internet service provider traffic, 1998.

NV PUC, Review of Interconnection and Resale Agreements between Incumbent Local Exchange Carriers and Competitors for approval in Nevada.

NV PUC, Docket No. 98-6005, Sprint of Nevada, Unbundled Network Element Costs (testimony), 1998.

NV PUC, Docket No. 98-6004, Nevada Bell, Unbundled Network Element Costs (testimony), 1998.

NV PUC, Docket No. 97-11017, Virtual Hipster Corp., Petition to terminate rural exemption of Churchill County Telephone Company (testimony), 1997.

NV PUC, Docket No. 96-8035, GTE, Depreciation Filing (testimony), 1997.

NV PUC, Docket No. 97-5027, Central Telephone Company-Nevada, tariff filing requesting an increase in directory assistance rates (testimony and cost analysis), 1997.

NV PUC, Docket No. 97-5018, Investigation into the impact of the Telecommunications Act of 1996 on Universal Service in Nevada (comments), 1997.

NV PUC, Docket No. 96-4041, Nevada Bell Petition on Confidential Nature of Telecommunications Cost Studies (testimony filed), 1996.

NV PUC, Docket No. 96-9035, Investigation into Procedures and Methodologies to Develop Costs for Bundled or Unbundled Telephone Services (comments, testimony and cost analysis), 1996.

NV PUC, Docket Nos. 96-3002 and 96-3003, Nevada Bell's Entry into a Plan of Alternative Regulation (testimony), 1996.