

Christine Runge

Senior Consultant



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SUMMARY

Christine Runge joined Power Advisory in 2017. She was actively involved in the 2018 ISO tariff proceeding, including the preparation of expert evidence and testimony before the Alberta Utilities Commission for both the initial proceeding and a subsequent review and variance application. This evidence and testimony focused on the tariff implications for distribution connected generators, specifically the adjusted metering practice and the substation fraction methodology.

She continues to work on tariff issues impacting distribution connected generators, including a replacement for the substation fraction methodology and the DCG Credits, such as Fortis' Option M.

Christine has also been involved in a number of regulatory proceedings, including a distribution Phase II application, an application for use of a descending-clock auction in an RRO energy price setting plan, the proceeding to determine the definition of anomalies in PBR going-in rates, the distribution system inquiry, and a complaint against a DFO for non-compliance with its terms and conditions. She was also involved with the Commission's regulatory burden reduction initiative.

Christine was involved in the development of the capacity market through the two-year consultation with the AESO and throughout the proceeding before the Commission, including the preparation of evidence and rebuttal evidence.

Prior to joining Power Advisory, Christine worked for the Commission in the distribution rates department, where she was involved in all aspects of the regulatory process. Some of the highlights of Christine's time at the Commission include analyzing the financial performance of utilities during the first generation of Performance Based Regulation to help assess the effectiveness of the PBR plans, taking responsibility for the capital aspect of the second generation of PBR that resulted in the innovative K-bar mechanism, key participant in the policy evaluation of the capacity market transition working with other government agencies, and building a cost allocation and rate design model to assess the bill impacts of the capacity market implementation.

Prior to the Commission, Christine worked for the Alberta Electric System Operator in the competitive process department, where she was involved in designing a competitive procurement process and using that process to bid out the Fort McMurray West transmission project. A similar process was later used for the Renewable Electricity Program.

Christine holds an M.A. in Economics and graduated from the University of Calgary. Her capstone project for graduate school studied the effect of wind generation on pool price in Alberta's electricity market.

Professional History

Power Advisory - July 2017 – present

Alberta Utilities Commission – June 2014 – Jun 2017

Alberta Electric System Operator – February 2013 – June 2014; July 2012 – December 2012; May 2011 – August 2011

Suncor Energy - January 2013 – April 2013

Education

University of Calgary, MA Economics, 2014

University of Calgary, BA Honours Economics, 2013

PROFESSIONAL EXPERIENCE

Client Representation at Stakeholder Consultations

- Developed an alternative to substation fractioning on behalf of the Distribution Connected Generation Consortium for the AESO consultation on Participant-Related Costs for DFOs (Substation Fraction) and DFO Cost Flow-Through. Presented and supported this alternative through the technical sessions.
- Represented the DCG Consortium in the bulk and regional consultation sessions for the 2021 ISO Tariff.
- Developed positions and represented clients during the AESO capacity market consultation.

Regulatory process

Alberta Utilities Commission

- Worked at the Commission for three years, assessing dozens of regulatory proceedings. Involved with all stages of the regulatory process and all sizes of proceedings.
- Prepared panel briefing documents, at the Commission, summarizing and assessing issues raised by parties. Regularly met with Commission members in examination of issues on the record and in development of findings.
- Drafted information requests, hearing questions, and decisions as Commission staff.

Power Advisory

- Expert witness in multiple Commission proceedings including preparation of evidence, response to IRs, and testimony before the Commission (specific filings and appearances listed above).
- Assisted BluEarth in the development of an application regarding a complaint against FortisAlberta for non-compliance with its terms and conditions related to the flow through of CCD allocations (Proceeding 25058).
- Assisted a utility client with application preparation on rates files and continued to advise the client throughout the remaining process steps. This included work on a distribution Phase II application, an application for use of a descending-clock auction in an RRO energy price setting plan, the proceeding to determine the definition of anomalies in PBR going-in rates, and multiple compliance filings.
- Developed submissions for the regulatory burden consultation.
- Assisted with information responses and other submissions to the distribution system inquiry on behalf of a utility client.

ISO tariff and distribution tariffs

- Prepared expert evidence and provided testimony in front of the Commission on the 2018 ISO Tariff implications for distribution connected generators, focusing on the adjusted metering practice and the substation fraction methodology.
- Continued to represent distribution connected generator interests in the 2018 ISO Tariff compliance filing, regarding the grandfathering of the adjusted metering practice.
- Involved in the development of a methodology to replace the existing substation fraction methodology for allocation of shared facilities costs to distribution connected generators. This included submitting an alternative proposal to both the AESO consultation and as expert evidence to the Commission proceeding.

- Involved in application drafting, the subsequent proceeding, and the compliance filing for a distribution phase II application.

Disibutrion ratesetting and analysis

- Built a robust model of capacity cost allocation, rate design, and typical bill impacts to assess the impact of various cost allocation structures proposed by the AESO in its capacity market design consultation.
- Built a long-term forecast model showing typical bill impacts for a number of Alberta rate classes from 2017 to 2030 under a number of carbon price scenarios.
- Built a model to assess PBR rates in Alberta during the first PBR term and determine if rates were lower than they would have been under a continuation of cost of service regulation.
- Worked on the next generation PBR proceeding to design the framework of the 2018-2022 term, specifically leading the capital issue resulting in a decision to implement a K-bar capital mechanism. Currently working on the rebasing proceeding to determine the criteria for anomaly adjustments.
- Worked on a number of capital tracker files during the 2013-2017 PBR term and involved with all the annual PBR rate setting files across all the distribution utilities in Alberta.
- Worked on a number of rate setting files over three years while at the Commission, including PBR annual rate change applications, rider implementation files, and other annual true-up files. Became the Commission specialist in assessing the potential for rate shock.
- Assisted in building a model to assess the impact on total rate class revenue and final rates of participants choosing to install micro-generation following the implementation of a new government policy that was pending at the time.

Capacity market

- Involved in the AESO capacity market design phase from 2017 through 2019, *i.e.* the SAM working groups, the CMD working groups, and the industry consultation sessions on the draft rules. Worked to analyze all content as it was released, worked with clients to help them form an understanding of the issues and develop positions, worked with clients to write arguments for submission into the stakeholder process.
- Involved with all stages of the Commission proceeding on the capacity market rules until the close of record. Prepared evidence and rebuttal evidence.

Other

- Worked on the competitive procurement process at the AESO. Assisted in developing the process and involved in all stages of the Fort McMurray West transmission project procurement.
- Research on Demand Side Management and Carbon Capture and Storage included in the AESO 2012 Long-term Outlook.
- Master of Arts capstone project analyzing the effect of instantaneous wind generation on pool price in Alberta's electricity market.

Authored Submissions to the Alberta Utilities Commission

ISO Tariff

- Proceeding 22942, Exhibit 22942-X0329, expert evidence on the implications of the 2018 ISO tariff to distribution connected generation, January 15, 2019.

- Proceeding 25848, Exhibit 25848-X0047, expert evidence on the substation fraction methodology and adjusted metering practice, September 15, 2020.
- Proceeding 25848, Exhibit 25848-X0074, expert rebuttal evidence responding to the AESO on the substation fraction methodology, September 29, 2020.

Capacity Market

- Proceeding 23757, Exhibit 23757-X0147, preliminary issue submission regarding the capacity market rules, November 2, 2018.
- Proceeding 23757, Exhibit 23757-X0375, expert evidence regarding the capacity market rules, February 28, 2019.
- Proceeding 23757, Exhibit 23757-X0509, rebuttal evidence regarding the capacity market rules, April 4, 2019.

Oral Testimony before the Alberta Utilities Commission

- Proceeding 22942, 2018 ISO tariff, March 22, 2019.