

# KEVIN M. LUCAS

## SOLAR ENERGY INDUSTRIES ASSOCIATION

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Mr. Lucas is Senior Director of Utility Regulation and Policy for the Solar Energy Industries Association (SEIA). SEIA is the national trade association for the U.S. solar industry. SEIA is leading the transformation to a clean energy economy, creating the framework for solar to achieve 30% of U.S. electricity generation by 2030. SEIA works with its 1,000 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power.

Since 2010, Mr. Lucas has worked in the energy and environment industry focusing on renewable energy, energy efficiency, and greenhouse gas reduction. In his role at SEIA, Mr. Lucas develops expert witness testimony for rate cases, integrated resource plans, and other regulatory proceedings. He has also been actively involved in the ongoing New York Reforming the Energy Vision docket, focusing on distributed energy resource valuation and rate design. Prior to joining SEIA, Mr. Lucas worked for the Alliance to Save Energy, a Washington DC-based nonprofit focused on reducing energy use in the built environment. Before the Alliance, he worked for the Maryland Energy Administration, the state energy office, on numerous legislative and regulatory issues and developed and presented testimony before the Maryland General Assembly and the Maryland Public Service Commission.

Prior to entering the energy and environment field, Mr. Lucas was a manager at Accenture, a leading consulting firm. Mr. Lucas implemented enterprise resource planning software for Fortune 500 companies in industries such as consumer electronics, oil and gas, and manufacturing.

### *AREAS OF EXPERTISE*

- Renewable Energy Policy Analysis: extensive experience analyzing renewable energy policy issues and communicating results to both expert and general audiences.
- Energy Efficiency Policy Analysis: detailed understanding of energy efficiency policies, including the development of potential studies and utility efficiency program design and implementation.
- Quantitative Analysis: deep expertise in quantitative analysis across a broad range of topics including analyzing financial and operational data sets, constructing models to explore electricity industry data, and incorporating original analysis into expert witness testimony.
- Energy Markets: studies interaction of renewable energy and energy efficiency policies with wholesale market operation and price impacts.
- Legislative Analysis: reviews legislation related to energy issues to discern potential impacts on markets, utilities, and customers.

### *EDUCATION*

Mr. Lucas holds a Masters of Business Administration from the University of North Carolina, Kenan-Flagler Business School (2009) and a Bachelor of Science in Engineering, Mechanical Engineering from Princeton University (1998).

### *ACADEMIC HONORS*

- Beta Gamma Sigma Honor Society
- Paul Fulton Fellowship, Kenan-Flagler Business School
- Graduated *cum laude* from Princeton University

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### *EXPERT WITNESS TESTIMONY*

#### **Arizona Corporation Commission**

- Docket No. E-01345A-19-0236 - *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 Rate-making Purposes, to Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.*
  - Analyzing and modifying APS's class cost of service study, arguing for changes to time of use rate design, proposing new rate designs for solar plus storage installations, proposing improvements to non-residential rate designs, advocating for a "bring your own device" program.

#### **Public Utilities Commission of the State of Colorado**

- Proceeding 17A-0797E – *Public Service Company - Accelerated Depreciation - AD/RR*
  - Advocating for appropriate structure to utilize renewable energy funds to support the early retirement of coal facilities and to continue to support distributed resources
- Proceeding 19A-0369E – *In the Matter of The Application of Public Service Company of Colorado For Approval of Its 2020-2021 Renewable Energy Compliance Plan*
  - Advocating for changes to better support solar and solar plus storage installations
- Proceeding 19AL-0687E - *In the Matter of Advice No. 1814-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 – Electric Tariff to Reflect a Modified Schedule RE-TOU and Related Tariff Changes to be Effective on Thirty-Days' Notice*
  - Designed and advocated for new data-based default time of use rate
- Proceeding No. 21A-0141E – *In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021 Electric Resource Plan and Clean Energy Plan.*
  - Argued for changes to proposed resource plan to more accurately reflect capabilities of solar and storage, to updated template contracts, and improve procurement process

#### **Georgia Public Service Commission**

- Docket No. 44160 – *In Re: Georgia Power Company's 2022 Integrated Resource Plan* and Docket No. 44161 – *In Re: Georgia Power Company's Application for the Certification, Decertification, and Amended Demand Side Management Plan*
  - Advocated for improvements to proposed procurement plan with an increased focus on solar plus storage projects and distributed energy resources; recommended expansion of monthly netting program for BTM solar projects

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### Maryland Public Service Commission

- Case 9153, 9154, 9155, 9156, 9157, 9362 - *In the Matter of Maryland Utility Efficiency, Conservation and Demand Response Programs Pursuant to the Empower Maryland Energy Efficiency Act of 2008*
  - Multiple filings regarding the design and implementation of Maryland's energy efficiency portfolio standard
- Case 9271 - *In re the Merger of Exelon Corp. & Constellation Energy Grp., Inc.*
  - Analysis of renewable energy commitments in merger proposal
- Case 9311 - *In re the Application of Potomac Elec. Power Co. for an Increase in its Retail Rates for the Distrib. of Elec. Energy*
  - Supporting the implementation of a limited cost tracker to accelerate reliability investments after 2012 Derecho
- Case 9326 - *In re the Application of Balt. Gas & Elec. Co. for Adjustments to its Elec. & Gas Base Rates.*
  - Supporting the implementation of a limited cost tracker to accelerate reliability investments after 2012 Derecho
- Case 9361 - *In re the Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc.*
  - Policy analysis of merger proposal

### Michigan Public Service Commission

- Case U-18419 – *In the matter of the application of DTE ELECTRIC COMPANY for approval of Certificates of Necessity pursuant to MCL 460.6s, as amended, in connection with the addition of a natural gas combined cycle generating facility to its generation fleet and for related accounting and ratemaking authorizations.*
  - Arguing against DTE Electric's proposal to construct a new natural gas combined cycle generating facility and instead meet its future capacity and energy needs with a distributed portfolio of solar, wind, energy efficiency, and demand response.
- Case U-20162 – *In the matter of the Application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority*
  - Arguing against DTE Electric's proposal for a net energy metering successor tariff that improperly undervalued the contribution of distributed solar.
- Case U-20165 – *In the matter of the application of Consumers Energy Company for approval of its integrated resource plan pursuant to MCL 460.6t and for other relief.*
  - Discussing Consumers Energy Company's integrated resource plan, arguing for advancing the deployment of solar to meet its capacity requirements, arguing against Consumers' proposed financial compensation mechanism for third-party PPA contracts, supporting a robust PURPA market, and supporting transparent and equitable competitive procurement guidelines.

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### Michigan Public Service Commission (con't)

- Case U-20471 - *In the matter of the Application of DTE Electric Company for approval of its integrated resource plan pursuant to MCL 460.6t, and for other relief.*
  - Evaluating DTE's integrated resource plan, arguing for the Company to modify its modeling assumptions for solar, analyzing the operation and reliability of DTE's aging peaker fleet, demonstrating that solar and solar plus storage could replace some of DTE's peakers, advocating for robust competition and third-party access to new resources.
- Case U-20836 – *In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.*
  - Critiquing DTE's Stable Bill tariff as poorly designed and not reflective of costs; arguing against the requirement for solar customers to take service on the Stable Bill tariff; calculating a new cost-based outflow tariff for exported solar energy.

### Public Utility Commission of Nevada

- Docket Nos. 17-06003 & 17-06004 Phase III – Rate Design – *Application of Nevada Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related thereto.*
  - Arguing against Nevada Power Company's proposal to increase fixed customer charge

### North Carolina Utility Commission

- Docket E-100 Sub 165 – *2020 Integrated Resource Plans*
  - Advocating for modifications to Duke Energy's IRP, including assumptions on capital and O&M costs, operational assumptions, and natural gas forecast methodology

### Public Service Commission of South Carolina

- Docket Nos. 2019-224-E and 2019-225-E – *South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC*
  - Advocating for modifications to Duke Energy's IRP, including assumptions on capital and O&M costs, operational assumptions, and natural gas forecast methodology

### Public Utility Commission of Texas

- Docket 46831 – *Application of El Paso Electric Company to change rates*
  - Critiquing El Paso Electric's proposal to implement a three-part rate for residential and small commercial net metered customers