

Exhibit No.:	Revenue Requirement
Issues:	Tyler Comings
Witness:	
Type of Exhibit:	
Sponsoring Party:	Sierra Club
Case No.:	ER-2024-0319
Date Testimony	December 3, 2024
Prepared:	

Missouri Public Service Commission
Case No. ER-2024-0319
Direct Testimony of Tyler Comings

Exhibit TC-1

Resume of Tyler Comings



Tyler Comings, Principal Economist

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PROFESSIONAL EXPERIENCE

Applied Economics Clinic, Arlington, MA. Principal Economist, June 2017 – Present.

Provides technical expertise on electric utility regulation, energy markets, and energy policy. Clients are primarily public service organizations working on topics related to the environment, consumer rights, the energy sector, and community equity.

Synapse Energy Economics Inc., Cambridge, MA. Senior Associate, July 2014 – June 2017, Associate, July 2011 – July 2014.

Provided expert testimony and reports on energy system planning, coal plant economics and economic impacts. Performed benefit-cost analyses and research on energy and environmental issues.

Ideas42, Boston, MA. Senior Associate, 2010 – 2011.

Organized studies analyzing behavior of consumers regarding finances, working with top researchers in behavioral economics. Managed studies of mortgage default mitigation and case studies of financial innovations in developing countries.

Economic Development Research Group Inc., Boston, MA. Research Analyst, Economic Consultant, 2005 – 2010.

Performed economic impact modeling and benefit-cost analyses using IMPLAN and REMI for transportation and renewable energy projects, including support for Federal stimulus applications. Developed a unique web-tool for the National Academy of Sciences on linkages between economic development and transportation.

Harmon Law Offices, LLC., Newton, MA. Billing Coordinator, Accounting Liaison, 2002 – 2005.

Allocated IOLTA and Escrow funds, performed bank reconciliation and accounts receivable. Projected legal fees and costs.

Massachusetts Department of Public Health, Boston, MA. Data Analyst (contract), 2002.

Designed statistical programs using SAS based on data from health-related surveys. Extrapolated trends in health awareness and developed benchmarks for performance of clinics for a statewide assessment.

EDUCATION

Tufts University, Medford, MA

Master of Arts in Economics, 2007

Boston University, Boston, MA

Bachelor of Arts in Mathematics and Economics, Cum Laude, Dean's Scholar, 2002.



AFFILIATIONS

Society of Utility and Regulatory Financial Analysts (SURFA)

Member

Global Development and Environment Institute, Tufts University, Medford, MA.

Visiting Scholar, 2017 – 2020

CERTIFICATIONS

Certified Rate of Return Analyst (CRRA), professional designation by Society of Utility and Regulatory Financial Analysts (SURFA)

PAPERS AND REPORTS

Lala, C.T., J.R. Castigliero, T. Comings, and E. Seliga. 2024. *TVA's Kingston Fossil Plant: An Economic Assessment of Replacement Alternatives*. Applied Economics Clinic. Prepared for the Southern Environmental Law Center (SELC). [[Online](#)]

Castigliero, J.R., T. Comings, S. Alisalad, and E.A. Stanton. 2021. *Background Report: Benefits of Coal Ash Cleanup and Remediation*. Applied Economics Clinic. Prepared for Earthjustice. [[Online](#)]

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Comings, T., B. Woods, and M. Majumder. 2019. *Updated Costs of Community Choice Energy Aggregation in Boston*. Applied Economics Clinic. Prepared for Barr Foundation. [[Online](#)]

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Stanton, E.A., T. Comings, R. Wilson, S. Alisalad, E.N Marzan, C. Schlegel, B. Woods, J. Gifford, E. Snook, and P. Yuen. 2018. *An Analysis of the Massachusetts 2018 'Act to Promote a Clean Energy Future' Report*. Applied Economics Clinic. Prepared for Barr Foundation. [[Online](#)]



Comings, T., E.A. Stanton, and B. Woods. 2018. *The ABCs of Boston CCE*. Applied Economics Clinic. Prepared for Barr Foundation. [\[Online\]](#)

Stanton, E.A., T. Comings, and A. Sommer. 2018. *The Husker Energy Plan: A New Energy Plan for Nebraska*. Applied Economics Clinic. Prepared for the Nebraska Wildlife Foundation. [\[Online\]](#)

Comings, T. and B. Woods. 2017. *The Future of the Martin Drake Power Plant*. Applied Economics Clinic. Prepared for Green Cities Coalition and Southeastern Colorado Renewable Energy Society. [\[Online\]](#)

Wilson, R., T. Comings, and E.A. Stanton. 2017. *Ratepayer Impacts of ConEd's 20-Year Shipping Agreement on the Mountain Valley Pipeline*. Applied Economics Clinic. Prepared for the Environmental Defense Fund. [\[Online\]](#)

Knight, P., A. Horowitz, P. Luckow, T. Comings, J. Gifford, P. Yuen, E. Snook, and J. Shoemith. 2017. *An Analysis of the Massachusetts Renewable Portfolio Standard*. Synapse Energy Economics and Sustainable Energy Advantage. Prepared for NECEC in Partnership with Mass Energy. [\[Online\]](#)

Knight, P., S. Fields, F. Ackerman, T. Comings, and A. Allison. 2017. *Empowering Kentucky*. Synapse Energy Economics. Prepared for Kentuckians for the Commonwealth. [\[Online\]](#)

Comings, T. and A. Allison. 2017. *More Mileage for Your Money: Fuel Economy Increases While Vehicle Prices Remain Stable*. Synapse Energy Economics. Prepared for Consumers Union. [\[Online\]](#)

Cook, R., J. Koo, N. Veilleux, K. Takahashi, E. Malone, T. Comings, A. Allison, F. Barclay, and L. Beer. 2017. *Rhode Island Renewable Thermal Market Development Strategy*. Meister Consultants Group and Synapse Energy Economics. Prepared for Rhode Island Office of Energy Resources. [\[Online\]](#)

Fisher, J., P. Luckow, A. Horowitz, T. Comings, A. Allison, E.A. Stanton, S. Jackson, and K. Takahashi. 2016. *Michigan Compliance Assessment for the Clean Power Plan: MPSC/MDEQ EPA 111(d) Impact Analysis*. Prepared for Michigan Public Service Commission, Michigan Department of Environmental Quality, and Michigan Agency for Energy. [\[Online\]](#)

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Comings, T., S. Jackson, and J. Fisher. 2016. *The Economic Case for Retiring North Valmy Generating Station*. Synapse Energy Economics. Prepared for Sierra Club. [\[Online\]](#)

Comings, T., A. Allison, and F. Ackerman. 2016. *Higher Fuel Economy Standards Result in Big Savings for Consumers*. Synapse Energy Economics. Prepared for Consumers Union. [\[Online\]](#)

Jackson, S., P. Luckow, E.A. Stanton, A. Horowitz, P. Peterson, T. Comings, J. Daniel, and T. Vitolo. 2016. *Reimagining Brayton Point: A Guide to Assessing Reuse Options for the Somerset Community*. Synapse Energy Economics. Prepared for Coalition for Clean Air South Coast, Clean Water Action, and Toxics Action Center. [\[Online\]](#)



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Ackerman, F. and T. Comings. 2015. *Employment after Coal: Creating New Jobs in Eastern Kentucky*. Synapse Energy Economics. Prepared for the Mountain Association for Community Economic Development. [\[Online\]](#)

Vitolo, T., M. Chang, T. Comings, and A. Allison. 2015. *Economic Benefits of the Proposed Coolidge Solar I Solar Project*. Synapse Energy Economics. Prepared for Coolidge Solar I, LLC. [\[Online\]](#)

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Synapse Energy Economics, Labor Network for Sustainability, and 350.org. 2015. *The Clean Energy Future: Protecting the Climate, Creating Jobs, and Saving Money*. [\[Online\]](#)

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Stanton, E. A., T. Comings, S. Jackson, and E. Karaca. 2015. *Atlantic Coast Pipeline Benefits Review*. Synapse Energy Economics. Prepared for Southern Environmental Law Center. [\[Online\]](#)

Takahashi, K., T. Comings, and A. Napoleon. 2014. *Maximizing Public Benefit through Energy Efficiency Investments*. Synapse Energy Economics. Prepared for Sierra Club. [\[Online\]](#)

Comings, T., S. Fields, K. Takahashi, and G. Keith. 2014. *Employment Effects of Clean Energy Investments in Montana*. Synapse Energy Economics. Prepared for Montana Environmental Information Center and Sierra Club. [\[Online\]](#)

Comings, T., J. Daniel, P. Knight, and T. Vitolo. 2014. *Air Emission and Economic Impacts of Retiring the Shawnee Fossil Plant*. Synapse Energy Economics. Prepared for the Kentucky Environmental Foundation. [\[Online\]](#)

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Ackerman, F., T. Comings, and P. Luckow. 2013. *A Review of Consumer Benefits from a Corporate Average Fuel Economy (CAFE) Standards*. Synapse Energy Economics. Prepared for Consumer Union. [\[Online\]](#)

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- Steinhurst, W. and T. Comings. 2011. *Economic Impacts of Energy Efficiency Investments in Vermont*. Synapse Energy Economics. Prepared for the Vermont Department of Public Service. [\[Online\]](#)
- Datta, S., P. Tanta, and T. Comings. 2011. *WING Mobile Payments: A Product Design Case Study*. Ideas42. Prepared for International Finance Corporation. [\[Online\]](#)
- Tanta, P. and T. Comings. 2011. *Kilimo Salama – Index-based Agriculture Insurance: A Product Design Case Study*. Ideas42. Prepared for International Finance Corporation. [\[Online\]](#)
- Tanta, P. and T. Comings. 2011. *Emergency Hand Loan: A Product Design Case Study*. Ideas42. Prepared for International Finance Corporation. [\[Online\]](#)
- Tanta, P. and T. Comings. 2011. *Commitment Savings Accounts in Malawi: A Product Design Case Study*. Ideas42. Prepared for International Finance Corporation. [\[Online\]](#)
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- Weisbrod, G. and T. Comings. 2008. *The Economic Role of the Gateway Transportation System in the Greater Vancouver Region*. Prepared for Greater Vancouver Gateway Council. [\[Online\]](#)
- Cambridge Systematics and Economic Development Research Group. 2008. *Economic Impact Study of Completing the Appalachian Development Highway System*. Prepared for Appalachian Regional Commission. [\[Online\]](#)



Lynch, T., T. Comings, and G. Weisbrod. 2007. *Spatial Geography: Effects of Population Base and Airport Access*. Prepared for Appalachian Regional Commission. [\[Online\]](#)

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Mead & Hunt and Economic Development Research Group. 2007. *Oregon Aviation Plan 2007*. Prepared for Oregon Department of Aviation. [\[Online\]](#)

Economic Development Research Group. 2007. *The Economic Impact of Philadelphia Convention Center*. Prepared for Pew Charitable Trusts. [\[Online\]](#)

Economic Development Research Group. 2006. *Environmental Impacts of Massachusetts Turnpike and Central Artery/Tunnel Projects*. Prepared for the Massachusetts Turnpike Authority. [\[Online\]](#)

TESTIMONY AND EXPERT COMMENTS

Comings, T. 2024. *Testimony on Duke Energy Indiana Rate Case*. Testimony to the Indiana Utility Regulatory Commission on behalf of Sierra Club. Cause No. 46038. [\[Online\]](#)

Comings, T., and J.R. Castigliero (with Sierra Club) 2024. *Comments on Evergy's 2024 IRP*. Comments to State Corporate Commission for the State of Kansas on behalf of the Sierra Club. Docket No. 24-EKCE-387-CPL. [\[Online\]](#)

Comings, T., and J.R. Castigliero (with Sierra Club) 2024. *Comments on Evergy's 2024 IRP*. Applied Economics Clinic. Comments to Missouri Public Service Commission on behalf of Sierra Club. File Nos. EO-2024-0153 and EO-2024-0154. [\[Online\]](#)

Comings, T. (with Fresh Energy and Minnesota Center for Environmental Advocacy) 2024. *Comments on Xcel Energy 2024 IRP in Minnesota*. Comments to the Minnesota Public Utilities Commission on behalf of Clean Energy Organizations. [\[Online\]](#)

Comings, T. (with Chelsea Hotaling) 2024. *Clean Energy Alternatives to Xcel's 2024 Integrated Resource Plan*. Expert report to the Minnesota Public Utilities Commission on behalf of Clean Energy Organizations. Docket No. E002/RP-24-67 [\[Online\]](#)

Comings, T. 2024. *Testimony on Tri-State Electric Resource Plan*. Testimony to the Colorado Public Utilities Commission on behalf of Natural Resources Defense Council and Sierra Club. Proceeding No. 23A-0585E. [\[Online\]](#)

Comings, T. 2024. *Cost of Capital and Asset Return for Workers' Compensation Insurance in Massachusetts*. Applied Economics Clinic. Advisory Filing prepared for the State Rating Bureau (SRB) of the Massachusetts Division of Insurance. Docket No. R2023-03.

Comings, T. and J.R. Castigliero (with Sierra Club) 2024. *Comments on Ameren Missouri's 2023 Integrated Resource Plan*. Comments to the Missouri Public Service Commission on behalf of Sierra Club. File No. EO-2024-0020. [\[Online\]](#)

Comings, T. and J.R. Castigliero (with Sierra Club) 2024. *Comments on Oklahoma Gas and Electric's 2024 Integrated Resource Plan*.

Comings, T. (with Fresh Energy and Minnesota Center for Environmental Advocacy) 2024. *Reply Comments of the Clean Energy Organizations on Otter Tail IRP*. Comments to the Minnesota Public Utilities Commission on behalf of Fresh Energy, Clean Grid Alliance, Minnesota Center for Environmental Advocacy, and Sierra Club. Docket No. 21-339. [\[Online\]](#)

Comings, T. 2023. *Testimony on Kentucky Power 2023 Rate Case*. Testimony to the Kentucky Public Service Commission on behalf of Joint Intervenors (Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society). Case No. 2023-00159. [\[Online\]](#)

Comings, T. 2023. *Comments on Xcel Colorado Electric Resource Plan*. Comments to Colorado Public Utilities Commission on behalf of Natural Resources Defense Council and Sierra Club. Proceeding No. 21A-0141E. [\[Online\]](#)

Comings, T. 2023. *Testimony on DTE Electric 2023 Rate Case*. Testimony to Michigan Public Service Commission on behalf of Michigan Environmental Council, Natural Resources Defense Council, Sierra Club and Citizens Utility Board of Michigan. Case No. U-21297. [\[Online\]](#)

Comings, T (with Chelsea Hotaling) 2023. *A Clean Energy Alternative for Otter Tail Power*. Comments on Otter Tail's IRP on behalf of Fresh Energy, Clean Grid Alliance, Minnesota Center for Environmental Advocacy, and Sierra Club. [\[Online\]](#)

Comings, T. 2023. *Comments on Tri-State Electric Resource Plan*. Comments to Colorado Public Utilities Commission on behalf of Natural Resources Defense Council and Sierra Club. Proceeding No. 20A-0528E. [\[Online\]](#)

Comings, T., and J.R. Castigliero (with Sierra Club) 2023. *Comments on Evergy's 2023 IRP Update*. Comments to State Corporate Commission for the State of Kansas on behalf of the Sierra Club. Docket No. 19-KCPE-096-CPL. [\[Online\]](#)

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Comings, T. 2023. *Testimony on Ameren Missouri Rate Case*. Testimony to Missouri Public Service Commission on behalf of Sierra Club. File No. ER-2022-0337. [\[Online\]](#)

Comings, T. 2022. *Testimony on Indiana Michigan Power IRP*. Testimony to Michigan Public Service Commission on behalf of Sierra Club. Docket No. U-21189. [\[Online\]](#)



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Comings, T. 2022. *Evergy Louisiana IRP Comments*. Comments to the Louisiana Public Service Commission on behalf of Sierra Club. Docket No. I-36181. [\[Online\]](#)

Comings, T. 2022. *Testimony on Consumers IRP in Michigan*. Testimony to the Michigan Public Service Commission on behalf of Michigan Environmental Council, Natural Resources Defense Council, and Sierra Club. MPSC Case No. U-21090. [\[Online\]](#)

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