

EXTERNSHIP WITH THE NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS (NARUC)

What is NARUC?

The National Association of Regulatory Utility Commissioners (NARUC) is a non-profit organization founded in 1889. Its members include the governmental agencies that are engaged in the regulation of utilities and carriers in the fifty States, the District of Columbia, Puerto Rico and the Virgin Islands. NARUC's member agencies regulate the activities of telecommunications, energy, and water utilities.

NARUC's mission is to serve the public interest by improving the quality and effectiveness of public utility regulation. Under State law, NARUC's members have the obligation to ensure the establishment and maintenance of utility services as may be required by the public convenience and necessity, and to ensure that such services are provided at rates and conditions that are just, reasonable and nondiscriminatory for all consumers. For more details, please visit NARUC's website at www.naruc.org.

NARUC's Legal and Legislative Advocacy

NARUC represents the interests of State public utility commissions before the three branches of the Federal government and the Independent Federal agencies. NARUC provides Members of Congress and their staff with:

- Association's position on issues being debated in the House or Senate
- Witnesses to testify before Congressional Committees
- Policy briefings to update and educate Senate and House staff.

Additionally, NARUC files briefs and pleadings before the U.S. Supreme Court and other Federal courts in support of State utility commission interests. NARUC also provides the Executive Branch with policy proposals and works with the Departments on the formulation of regulatory policies. NARUC works closely with the Federal Energy Regulatory Commission (FERC), the Federal Communications Commission (FCC), and the Nuclear Regulatory Commission (NRC), the Securities and Exchange Commission and the Federal Trade Commission to ensure the State perspective is considered in their proceedings.

Extern Responsibilities Examples

The following are examples of duties performed by our summer extern/intern:

Assignments for our General Counsel, Assistant General Counsel (energy issues), Legislative Director (telecom), Legislative Director (energy) and Grants and Research department. Below is a listing of some assignments:

- o Telecom legislative:

- Researched state legislation, regulation and statistics on video franchising and right-of-way to help assess impact on telephone company entry into the cable TV market.
 - Researched novel consumer protection issues that would impact federal and state regulation of Voice-Over-Internet-Protocol ("VOID") services offered over broadband Internet connections.
 - Attended House and Senate congressional hearings and participated in strategy sessions for NARUC testimony before the House Energy and Commerce Committee on April 27.
 - Delivered letters, testimony and other materials to congressional offices.
 - Attended lobbying meetings with congressional staff and strategy meetings with allied associations such as National League of Cities, National Governors' Assn., *et al.*
- o Telecom legal:
 - Researched "cooperative federalism" in statutes governing the railroad, airline and other industries to find analogies for telecom industry oversight.
 - Summarized recent changes in consensus policies of NARUC on telecom issues.
- o Energy legislative:
 - Drafted summaries and side-by-side analysis of about eight titles in House and Senate energy legislation (about 800 pages of legislation).
- o Energy legal:
 - Researched legislative history for the Nuclear Waste Act of 1983 to support federal litigation.
 - Researched implications of recently-passed law to repeal the Public Utility Holding Company Act to assist in a association regulatory and legal strategy.
 - Learned specific legal research skills, such as citing cases, organization of courts, federalism, etc.
 - Wrote articles for the NARUC bulletin about industry regulatory issues.
- o Grants and Research Department:
 - Edited summaries for document survey on state and local rights-of-way statutes and regulations for electrical transmission lines.

The above is just an example of possible projects. Various other substantive assignments will be available. For example, a major project going forward is implementation of the Energy Policy Act of 2005 signed into law on August 8, 2005. This legislation is the most comprehensive energy legislation since the Energy Policy Act of 1992 and will impact almost every sector of the energy industry.