

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

**IN RE:
GEORGIA POWER'S 2022 RATE CASE) DOCKET NO. 44280**

**DIRECT TESTIMONY AND EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

THE COMMERCIAL GROUP**

OCTOBER 20, 2022

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Ex. CG-___ (SWC-4): Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

Ex. CG-___ (SWC-5): Revenue Requirement Impact of GPC Proposed ROE vs. National Average of Approved ROEs for Vertically Integrated Utilities, 2023

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Ex. CG-___ (SWC-8): Revenue Requirement Impact of GPC Proposed ROE vs. National Average of Approved ROEs for Vertically Integrated Utilities, 2023

1 **Introduction**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.**

3 A. My name is Steve W. Chriss. My business address is 2608 SE J Street, Bentonville,
4 AR 72716-0550. I am employed by Walmart Inc. as Director, Energy Services.

5 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?**

6 A. I am testifying on behalf of the Commercial Group. The Commercial Group is an ad
7 hoc association of large customers of Georgia Power Company (“GPC” or “the
8 Company”).

9 **Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

10 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State
11 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the
12 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My
13 duties included research and analysis on domestic and international energy and
14 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility
15 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties
16 included appearing as a witness for PUC Staff in electric, natural gas, and
17 telecommunications dockets. I joined the energy department at Walmart in July 2007
18 as Manager, State Rate Proceedings. I was promoted to Senior Manager, Energy
19 Regulatory Analysis, in June 2011. I was promoted to my current position in October,
20 2016, and the position was re-titled in October, 2018. My Witness Qualifications
21 Statement is included herein as Appendix A hereto.

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
2 **GEORGIA PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

3 A. Yes. I testified in Docket Nos. 31958, 36989, 40161, 42310, 42516, 44160, and 44161.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**
5 **STATE REGULATORY COMMISSIONS?**

6 A. Yes. As provided in Appendix A, I have submitted testimony in over 240 proceedings
7 before 41 other utility regulatory commissions. I have also submitted testimony before
8 legislative committees in Kansas, Missouri, North Carolina, and South Carolina. My
9 testimony has addressed topics including, but not limited to, cost of service and rate
10 design, return on equity, revenue requirements, ratemaking policy, large customer
11 renewable programs, qualifying facility rates, telecommunications deregulation,
12 resource certification, energy efficiency/demand side management, fuel cost
13 adjustment mechanisms, decoupling, and the collection of cash earnings on
14 construction work in progress.

15 **Q. ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

16 A. Yes. I am sponsoring the exhibits listed in the Table of Contents.

17
18 **Purpose of Testimony and Summary of Recommendations**

19 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

20 A. The purpose of my testimony is to respond to GPC’s rate case filing and to provide
21 recommendations to assist the Commission in its thorough and careful consideration of
22 the customer impact of the Company’s proposed rate increase.

1 **Q. IN SETTING THE REVENUE REQUIREMENT, RETURN ON EQUITY**
2 **(“ROE”), ALLOCATION, AND RATE DESIGN CHANGES FOR THE**
3 **COMPANY, SHOULD THE COMMISSION CONSIDER THE IMPACT OF**
4 **THE PROPOSED RATE INCREASE ON BUSINESS CUSTOMERS?**

5 A. Yes. Electricity is a significant operating cost for retailers such as those in the
6 Commercial Group. When electric rates increase, the increased cost to retailers can put
7 pressure on consumer prices and on the other expenses required by a business to
8 operate. The Commission should thoroughly and carefully consider the impact on
9 customers when examining the requested revenue requirement and ROE, in addition to
10 all other facets of this case, to ensure that any increase in the Company’s rates is the
11 minimum necessary to provide safe, adequate, and reliable service, while also
12 providing GPC the opportunity to recover its reasonable and prudent costs, earn a
13 reasonable return on its investment, and meet large commercial customer expectations
14 for customer service.

15 **Q. WHAT IMPACTS DO YOUR COMPANIES HAVE ON THE GEORGIA**
16 **ECONOMY?**

17 A. The companies in the Commercial Group have a significant positive impact on the
18 Georgia economy. For example, as of August, 2022, Walmart alone had 227 facilities
19 and approximately 66,000 associates in Georgia, spent \$25.8 billion with Georgia-
20 based suppliers, and supported over 277,000 supplier jobs in the state.¹

¹ <https://corporate.walmart.com/our-story/locations/united-states/georgia>

1 **Q. PLEASE SUMMARIZE THE COMMERCIAL GROUP’S**
2 **RECOMMENDATIONS TO THE COMMISSION.**

3 A. The Commercial Group’s recommendations to the Commission are as follows:

4 1) While optimally the Company’s shareholders should bear the risk of regulatory lag
5 contained in the traditional regulatory process, the Commercial Group recognizes that
6 Alternate Rate Plans (“ARPs”) are typically used by the Commission for ratemaking
7 purposes. As such, for the purposes of this docket, the Commercial Group does not
8 generally oppose the Commission’s use of an ARP for ratemaking purposes, subject to
9 the following recommendation and comments to the Commission regarding the
10 proposal:

11 a. At the Company’s proposed ROE and revenue requirement, the Commercial
12 Group does not oppose the Company’s proposed ROE band of 9.5 percent to
13 12 percent, which is a range of 150 basis points below the proposed ROE of 11
14 percent to 100 basis points above the proposed ROE. If the Commission
15 approves a lower ROE in this docket than that proposed by the Company, the
16 Commission should contemporaneously reduce the low and high band
17 boundaries and maintain the basis point spread of the band around the approved
18 ROE.

19 b. The Commission should consider the near-term financial impacts to customers
20 of the Company’s levelization proposal as it determines whether to levelize, and
21 if so, how much revenue requirement should be levelized.

22 c. In its consideration on the appropriate ROE for the Company, the Commission
23 should recognize that the proposed ARP shifts risk from the Company’s

1 shareholders to customers by removing the effects of regulatory lag from 2023
2 through 2025.

3 2) The Commission should closely examine the Company's proposed revenue
4 requirement increase and the associated proposed increase in ROE, especially when
5 viewed in light of:

- 6 a. The customer impact of the proposed revenue requirement increases;
- 7 b. The reduction in risk from regulatory lag from the Company's proposed ARP;
8 and
- 9 c. Recent rate case ROEs approved by other Commissions nationwide.

10 3) The Commission should approve a revenue allocation in this docket that moves classes
11 toward parity.

12 **Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR**
13 **POSITION ADVOCATED BY THE COMPANY INDICATE THE**
14 **COMMERCIAL GROUP'S SUPPORT?**

15 A. No. The fact that an issue is not addressed herein or in related filings should not be
16 construed as an endorsement of, agreement with, or consent to any filed position.

17

18 **Revenue Requirement and Cost of Capital**

19 **Q. WHAT ARE GEORGIA POWER'S PROPOSED REVENUE DEFICIENCIES**
20 **FOR 2023 THROUGH 2025?**

21 A. As shown in Table 1, Georgia Power's proposed total company revenue deficiencies
22 start at approximately \$599 million in 2023 and increase to approximately \$1.3 billion
23 in 2025.

Table 1. Georgia Power's Proposed Non-Levelized Revenue Deficiencies, 2023-2025 (\$000,000)

	Base Rate					
	Tariff	CCR				
	Revenues	ARO	ECCR	MFF	DSM	Total
2023	\$461	\$64	\$29	\$14	\$30	\$599
2024	\$718	\$143	(\$12)	\$22	\$56	\$927
2025	\$1,080	\$189	(\$25)	\$31	\$54	\$1,330

Source: Direct Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson, page 21.

Q. DOES THE COMPANY PROPOSE TO ADDRESS THE EXPECTED REVENUE DEFICIENCIES FOR 2023 THROUGH 2025 BY FILING ANNUAL RATE CASES?

A. No. Instead, the Company proposes an ARP. My understanding is that, generally, the proposed ARP consists of the following:

- 1) Continuation of base rate tariffs through December 31, 2025, with adjustments proposed based on currently projected revenues, expenses, rate base, and cost of capital for a test year ending July 31, 2023, modified for a levelization adjustment.
- 2) Continuation of the Environmental Compliance Cost Recovery tariff with revisions effective January 1, 2023, and further adjustments to be made on January 1, 2024, and January 1, 2025.
- 3) Adjustment of the Demand Side Management tariff, with additional annual adjustments in 2024 and 2025.
- 4) Adjustment of the Municipal Franchise Fee tariff, with additional annual adjustments in 2024 and 2025.
- 5) Continuation of the previous ARP's ROE range of 9.5 percent to 12 percent.

6) Continuation of the Annual Surveillance report from the previous ARP, with 80 percent of earnings above the ROE band returned to customers and 20 percent retained by the Company.

7) Continuation of the option from the previous ARP to file for Interim Cost Recovery in the event that earnings fall below the ROE band. *See* Direct Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson, page 22, line 4 to page 23, line 10.

Q. HOW HAS GEORGIA POWER PROPOSED TO STRUCTURE ITS PROPOSED REVENUE REQUIREMENTS FOR 2023 THROUGH 2025 THROUGH THE ARP?

A. As shown in Table 2, Georgia Power has proposed to levelize their proposed revenue requirement changes for 2023 through 2025.

Table 2. Georgia Power's Proposed Levelized Revenue Deficiencies, 2023-2025 (\$000,000)

	Base Rate Tariff Revenues	CCR ARO	ECCR	MFF	DSM	Total
2023	\$739	\$64	(\$1)	\$20	\$30	\$852
2024	\$739	\$142	(\$1)	\$22	\$57	\$959
2025	\$739	\$189	(\$1)	\$23	\$55	\$1,005

Source: Direct Testimony of Aaron P. Abramovitz, Sarah P. Adams, Adam D. Houston, and Michael B. Robinson, page 9 and APA-SPA-ADH-MBR-1, Schedule 2, Traditional Base.

The Company's proposed levelization will result in an over-collection of revenues of approximately \$253 million for 2023 and \$32 million for 2024 and an under-collection of revenues of approximately \$325 million in 2025 when compared to the proposed deficiencies shown in Table 1. On a net present value basis both options are essentially

1 equal, using the Company's proposed weighted average cost of capital as the discount
2 rate.

3 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED**
4 **ROE?**

5 A. My understanding is that the Company proposes an ROE of 11 percent. *See* Direct
6 Testimony of James M. Coyne, page 3, line 19.

7 **Q. DOES THE COMMERCIAL GROUP HAVE ANY COMMENTS ON THE**
8 **COMPANY'S PROPOSED ARP?**

9 A. Yes. While optimally the Company's shareholders should bear the risk of regulatory
10 lag contained in the traditional regulatory process, the Commercial Group recognizes
11 that ARPs are typically used by the Commission for ratemaking purposes. As such, for
12 the purposes of this docket, the Commercial Group does not generally oppose the
13 Commission's use of an ARP for ratemaking purposes, subject to the following
14 recommendation and comments to the Commission regarding the proposal.

15 **Q. WHAT IS THE COMMERCIAL GROUP'S RECOMMENDATION?**

16 A. At the Company's proposed ROE and revenue requirement, the Commercial Group
17 does not oppose the Company's proposed ROE band of 9.5 percent to 12 percent, which
18 is a range of 150 basis points below the proposed ROE of 11 percent to 100 basis points
19 above the proposed ROE. If the Commission approves a lower ROE in this docket than
20 that proposed by the Company, the Commission should contemporaneously reduce the
21 low and high band boundaries and maintain the basis point spread of the band around
22 the approved ROE. As an example, if the Commission approves an ROE of 10 percent,

1 the band would then be from 8.5 percent to 11 percent.

2 **Q. DOES THE COMMERCIAL GROUP HAVE ANY ADDITIONAL**
3 **COMMENTS REGARDING THE PROPOSED ARP?**

4 A. Yes. The Commercial Group is concerned about the near-term impacts of the
5 Company's levelization proposal on Georgia Power's customers, particularly in light
6 of customer bill impacts from recent increases in fuel rates, and for RTP customers,
7 marginal prices. While the overall impact through 2025, on a net present value basis,
8 is the same as the non-levelized structure, as noted above, the Commission should
9 consider these impacts as it determines whether to levelize, and if so, how much
10 revenue requirement should be levelized.

11 Additionally, in its consideration on the appropriate ROE for the Company, the
12 Commission should recognize that the proposed ARP shifts risk from the Company's
13 shareholders to customers by removing the effects of regulatory lag from 2023 through
14 2025.

15 **Q. WHAT IS THE COMPANY'S PROPOSED ROE IN THIS DOCKET?**

16 A. GPC is proposing an ROE of 11 percent, based on an estimated range of 8.99 percent
17 to 13.55 percent, with an additional 50 basis point financial risk adjustment. *See* Direct
18 Testimony of James M. Coyne, page 9, line 15 to line 19. The requested ROE at the
19 Company's proposed capital structure results in a proposed overall rate of return of
20 7.71 percent for 2023, 7.74 percent for 2024, and 7.77 percent for 2025. *See*
21 APA/SPA/ADH/MBR-1, Schedule 1.

1 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S REPORTED**
2 **ROE FOR THE THIRTEEN MONTHS ENDING DECEMBER 31, 2021?**

3 A. My understanding is that the Company’s reported ROE for the thirteen months ending
4 December 31, 2021, is 12.09 percent. *See* M.F.R. Item – General 1(a), page 1. As I
5 will discuss below, this is well above the ROEs *awarded* by commissions nationwide
6 during the same period.

7 **Q. IS THE COMMERCIAL GROUP CONCERNED ABOUT THE**
8 **REASONABLENESS OF THE COMPANY’S PROPOSED ROE?**

9 A. Yes, especially when viewed in light of:

- 10 1) The customer impact of the proposed revenue requirement increases;
- 11 2) The reduction in risk from regulatory lag from the Company’s proposed ARP; and
- 12 3) Recent rate case ROEs approved by other commissions nationwide.

1 *Customer Impact*

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S CURRENTLY**
3 **APPROVED ROE?**

4 A. My understanding is that the Company's currently approved ROE is 10.5 percent. *See*
5 *Order Adopting Settlement Agreement as Modified*, Docket No. 42516 (2019), page 5.

6 **Q. HAVE YOU CALCULATED AN ESTIMATE OF THE IMPACT OF THE**
7 **RETURN ON RATE BASE FROM THE COMPANY'S PROPOSED**
8 **INCREASE IN ROE FROM 10.5 PERCENT TO 11 PERCENT FOR THE**
9 **COMPANY'S PROPOSED NON-LEVELIZED DEFICIENCIES?**

10 A. Yes. Using the Company's proposed rate base, cost of debt, and capital structure for
11 each test year, the impact of the proposed changes for 2023 from the increase in ROE
12 is approximately \$93.7 million, or 16.1 percent of the proposed non-levelized revenue
13 deficiency. *See* Ex. CG-____ (SWC-1). For 2024, the impact is approximately \$100.8
14 million, or 11.1 percent of the cumulative proposed revenue increases for 2023 and
15 2024. *See* Ex. CG-____ (SWC-2). Finally, for 2025, the impact is approximately \$106.7
16 million, or 8.2 percent of the cumulative proposed revenue increase for 2023, 2024,
17 and 2025. *See* Ex. CG-____ (SWC-3).

18
19 *National Utility Industry ROE and Weighted Equity Cost Trends*

20 **Q. IS THE COMPANY'S TOTAL PROPOSED ROE SIGNIFICANTLY HIGHER**
21 **THAN THE ROES APPROVED BY OTHER UTILITY REGULATORY**
22 **COMMISSIONS IN 2019, 2020, 2021, AND SO FAR IN 2022?**

23 A. Yes. According to data from S&P Global Market Intelligence ("S&P Global"), a

1 financial news and reporting company, the average of the 121 reported electric utility
2 rate case ROEs authorized by commissions to investor-owned utilities in 2019, 2020,
3 2021 and so far in 2022, is 9.45 percent. The range of reported authorized electric
4 ROEs for the period is 7.36 percent to 10.60 percent, and the median authorized electric
5 ROE is 9.50 percent. *See* Ex. CG-____ (SWC-4). As such, the Company's total
6 proposed ROE of 11 percent is counter to broader electric industry trends.

7 **Q. SEVERAL OF THE REPORTED AUTHORIZED ROES ARE FOR**
8 **DISTRIBUTION-ONLY UTILITIES OR FOR ONLY A UTILITY'S**
9 **DISTRIBUTION SERVICE RATES. WHAT IS THE AVERAGE**
10 **AUTHORIZED ROE IN THE REPORTED GROUP FOR VERTICALLY**
11 **INTEGRATED UTILITIES?**

12 A. In the group reported by S&P Global, the average ROE for vertically integrated utilities
13 authorized over the same time period is 9.58 percent, with the overall average generally
14 falling from year to year. The average ROE authorized for vertically integrated utilities
15 in 2019 was 9.73 percent, in 2020 it was 9.55 percent, in 2021 it was 9.55 percent, and
16 so far in 2022 it is 9.35 percent. *Id.* As such, the Company's proposed total ROE of
17 11 percent is counter to broader electric industry trends and, in fact, as shown in Figure
18 1, if approved, would be the highest ROEs approved since 2019.

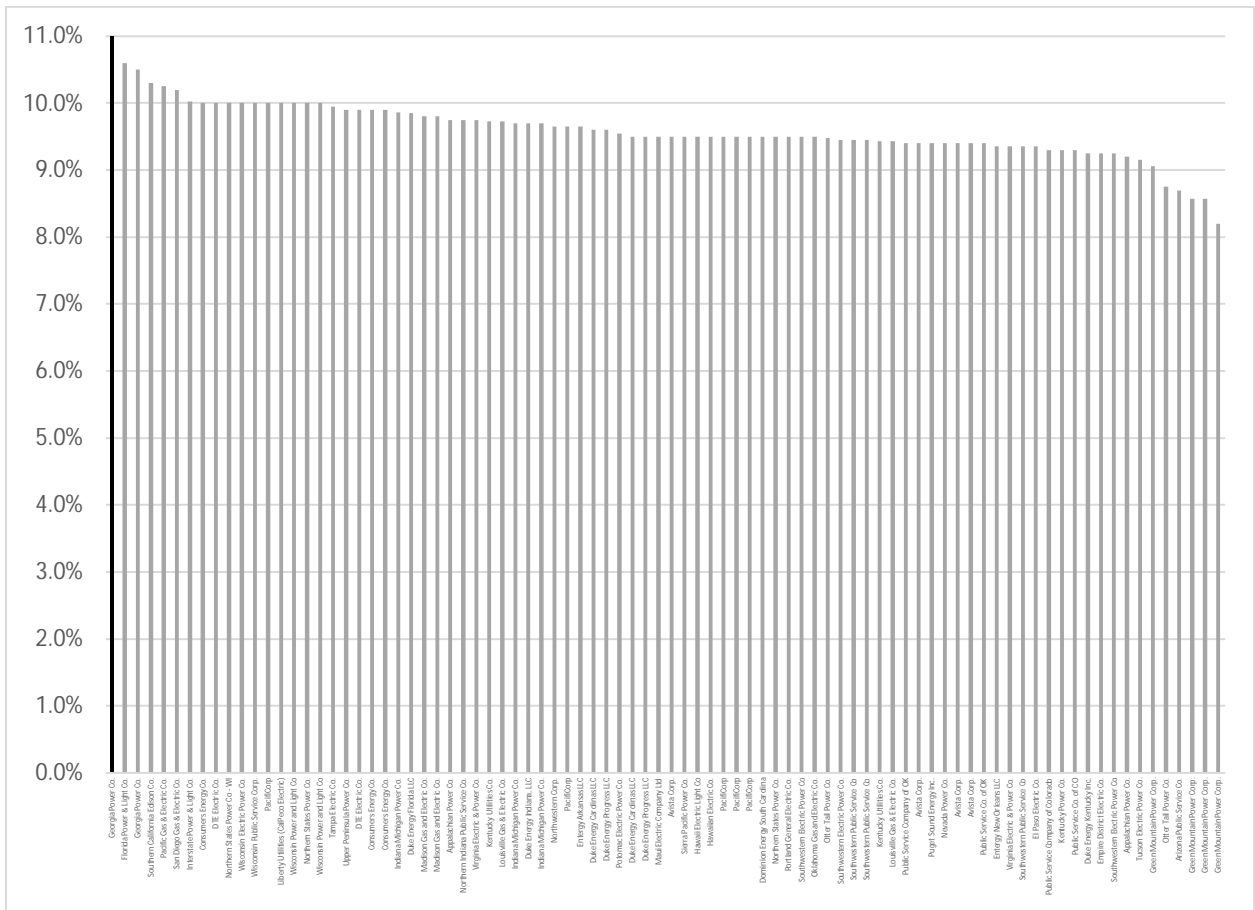


Figure 1. GPC Proposed Total ROE of 11 Percent Versus Approved ROEs, Vertically Integrated Utilities, 2019 to Present.

Q. WHAT IS THE DIFFERENCE IN REVENUE REQUIREMENT BETWEEN THE COMPANY'S PROPOSED 11 PERCENT ROE AND 9.58 PERCENT, WHICH IS THE AVERAGE AUTHORIZED ROE FOR VERTICALLY INTEGRATED UTILITIES FROM 2016 TO PRESENT?

A. For 2023, the difference in revenue requirement for this difference in ROE is approximately \$265.8 million, or 45.5 percent of the Company's proposed non-levelized revenue deficiency. *See* Ex. CG-____ (SWC-5). For 2024, the impact is approximately \$285.8 million, or 31.6 percent of the cumulative proposed revenue increases for 2023 and 2024. *See* Ex. CG-____ (SWC-6). Finally, for 2025, the impact

1 is approximately \$302.9 million, or 23.3 percent of the cumulative proposed revenue
2 increase for 2023, 2024, and 2025. *See* Ex. CG-____ (SWC-7).

3 **Q. IS THE COMMERCIAL GROUP RECOMMENDING THAT THE**
4 **COMMISSION BE BOUND BY ROES AUTHORIZED BY OTHER STATE**
5 **REGULATORY AGENCIES?**

6 A. No. Decisions of other state regulatory commissions are not binding on this
7 Commission. Each commission considers the specific circumstances in each case in
8 its determination of the proper ROE and capital structure. The Commercial Group is
9 providing this information on industry trends on ROE from its perspective as customers
10 with operations that are nationwide as it believes that recently authorized ROEs in other
11 jurisdictions provide a general gauge of reasonableness for the various cost of equity
12 analyses presented in this case. Moreover, the Commercial Group believes that it is
13 appropriate for the Commission to consider how any ROE authorized in this case
14 impacts existing and prospective customers relative to other jurisdictions.

15
16 ***Conclusion***

17 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION**
18 **REGARDING THE COMPANY'S PROPOSED ROE?**

19 A. The Commission should closely examine the Company's proposed revenue
20 requirement increase and the associated proposed increase in ROE, especially when
21 viewed in light of:

- 22 1) The customer impact of the proposed revenue requirement increases;
23 2) The reduction in risk from regulatory lag from the Company's proposed ARP;

1 and

2 3) Recent rate case ROEs approved by other commissions nationwide.

3
4 **Cost of Service and Revenue Allocation**

5 **Q. GENERALLY, WHAT IS THE COMMERCIAL GROUP'S POSITION ON**
6 **SETTING RATES BASED ON THE UTILITY'S COST OF SERVICE?**

7 A. The Commercial Group advocates that rates be set based on the utility's cost of service
8 for each rate class. This produces equitable rates that reflect cost causation, send proper
9 price signals, and minimize price distortions.

10 **Q. DOES THE COMMERCIAL GROUP TAKE A POSITION ON THE**
11 **COMPANY'S PROPOSED COST OF SERVICE MODEL AT THIS TIME?**

12 A. No. However, to the extent that alternative cost of service models or modifications to
13 the Company's model are proposed by other parties, the Commercial Group reserves
14 the right to address any such proposals.

15 **Q. HOW DOES THE COMPANY REPRESENT WHETHER RATES FOR A**
16 **CUSTOMER CLASS ACCURATELY REFLECT THE UNDERLYING COST**
17 **CAUSATION?**

18 A. The Company reflects this relationship in their cost of service results through the use
19 of class-specific and rate schedule-specific rates of return. These rates of return can be
20 converted into a relative rate of return ("RROR"), which is an indexed measure of the
21 relationship of the rate of return for an individual customer class to the total system rate
22 of return. An RROR greater than 1.0 means that the customer class is paying rates in
23 excess of costs incurred to serve that class, and an RROR less than 1.0 means that the

customer class is paying rates less than the costs incurred to serve that class. As such, those rate classes with an RROR greater than 1.0 are subsidizing the classes with an RROR less than 1.0. A class with an RROR equal to 1.0 is said to be at parity.

Q. HAVE YOU CALCULATED RATE GROUP RRORs BASED ON THE COMPANY'S COST OF SERVICE RESULTS?

A. Yes, as shown in Table 3 below:

Table 3. Rate Group Rates of Return and RRORs, Test Year Ending July 31, 2023, GPC Proposed Cost of Service Study Results.

Rate Group	Rate of Return (%)	RROR
Domestic	5.21	0.83
Small Business	7.28	1.15
Medium Business	9.35	1.48
Large Business	8.66	1.37
Agricultural	6.31	1.00
Government	3.71	0.59
Lighting	7.96	1.26
Marginal	6.33	1.00
<i>RTP-DA</i>	8.25	1.31
<i>RTP-HA</i>	6.56	1.04
Total Retail Service	6.31	1.00

Source: LPE-1, page 3 to page 4, LPE-2, page 7, and Exhibit SWC-8.

While the Marginal rate group as a whole provides a rate of return, and RROR, essentially equal to total retail service, it should be noted that the two largest classes within that rate group, RTP-DA and RTP-HA, provide rates of return and RORR significantly above that of total retail service.

Q. WHY IS THIS IMPORTANT?

A. This is important because examining the cost of service study results at the rate group level may mask the movements in the allocation of revenues that are needed to bring the underlying schedules closer to their respective costs of service.

1 **Q. DOES THE COMPANY PROPOSE A REVENUE ALLOCATION THAT**
2 **MOVES RATE GROUPS AND THEIR UNDERLYING SCHEDULES CLOSER**
3 **TO COST OF SERVICE?**

4 A. No. The Company proposes to allocate the proposed base rate increase on an equal
5 percentage basis and generally adjust each rate schedule such that the same percent
6 adjustment is applied to each charge within the schedules. *See* Direct Testimony of
7 Larry T. Legg, page 5, line 6 to line 9. The proposed revenue allocation will largely
8 leave the existing cross-subsidies in place.

9 **Q. SHOULD THE COMMISSION ADOPT A REVENUE ALLOCATION IN THIS**
10 **DOCKET THAT MOVES CLASSES CLOSER TO PARITY?**

11 A. Yes. My understanding is that the Commission has adopted movement towards parity
12 in the several recent Georgia Power rate case. In Docket No. 42516, the 2019 rate case,
13 the Commission found the stipulated allocation, in which Medium Business and Large
14 Business received an increase of 85 percent of the overall base rate increase, with the
15 resulting deficiency spread to other rate groups excluding Small Business, Lighting,
16 and Marginal rate groups, to be just and reasonable. Order Adopting Settlement
17 Agreement as Modified, Docket 42516 (2020), Findings of Fact ¶16. Additionally, the
18 Commission has previously found in the 2010 and 2013 rate cases that further
19 movement towards parity would also be appropriate in those dockets. Order Adopting
20 Settlement Agreement, Docket 36989 (2013), Findings of Fact ¶7; Final Order
21 adopting settlement agreement, Docket 31958 (2010), *see* Settlement Agreement ¶15.

22 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

23 A. Yes.

Appendix A

Steve W. Chriss

Walmart Inc.

Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

Director, Energy and Strategy Analysis (October 2016 – October 2018)

Senior Manager, Energy Regulatory Analysis (June 2011 – October 2016)

Manager, State Rate Proceedings (July 2007 – June 2011)

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001	Louisiana State University	M.S., Agricultural Economics
1997-1998	University of Florida	Graduate Coursework, Agricultural Education and Communication
1997	Texas A&M University	B.S., Agricultural Development
		B.S., Horticulture

PRESENT MEMBERSHIPS

Arkansas Advanced Energy Foundation, Board

Clean Energy Buyers Alliance, Advisory Board

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

South Carolina Electricity Market Reforms Measures Study Committee

PAST MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board, 2020-2022

Southwest Power Pool, Corporate Governance Committee, 2019

TESTIMONY BEFORE REGULATORY COMMISSIONS

2022

Minnesota Docket No. E-002/GR-21-630: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

Colorado Proceeding No. 22AL-0130E: In the Matter of Advice No. 1881-Electric of Public Service Company of a Resiliency Service Program Tariff in its Colorado PUC No. 8-Electric Tariff Effective April 24, 2022.

Texas Docket No. 53601: Application of Oncor Electric Delivery Company for Authority to Change Rates.

Washington Docket No. UE-220066: Puget Sound Energy 2022 General Rate Case.

Washington Docket No. UG-220067: Puget Sound Energy 2022 Natural Gas General Rate Case.

Idaho Case No. IPC-E-21-40: In the Matter of Idaho Power Company's Application to Expand Optional Customer Clean Energy Offerings Through the Clean Energy Your Way Program.

Georgia Docket No. 44160: Georgia Power's 2022 Integrated Resource Plan.

Georgia Docket No. 44161: Application for the Certification, Decertification, and Amended Demand Side Management Plan.

2021

Missouri Case No. ER-2021-0312: In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area.

Indiana Cause No. 45576: Petition of Indiana Michigan Power Company, an Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service through a Phase In Rate Adjustment; and for Approval of Related Relief Including: (1) Revised Depreciation Rates; (2) Accounting Relief; (3) Inclusion of Capital Investment; (4) Rate Adjustment Mechanism Proposals; (5) Customer Programs; (6) Waiver to Declination of Jurisdiction with Respect to Certain Rules; and (7) New Schedules of Rates, Rules, and Regulations.

Oregon Docket No. UE 394: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

Missouri File No. ER-2021-0240: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service.

Florida Docket No. 20210015-EI: In re: Petition for Rate Increase by Florida Power & Light Company.

California Docket No. R-20-08-020: Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.

New Mexico Case No. 20-00238-UT: In the Matter of Southwestern Public Service Company's Application For: (1) Revision of its Retail Rates Under Advice Notice No. 292; (2) Authorization and Approval to Abandon its Plant X Unit 3 Generating Station; and (3) Other Associated Relief.

North Dakota Case No. PU-20-441: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in North Dakota.

New Mexico Case No. 20-00222-UT: In the Matter of the Joint Application of Avangrid, Inc., Avangrid Networks, Inc., NM Green Holdings, Inc., Public Service Company of New Mexico and PNM Resources, Inc. For Approval of the Merger of NM Green Holdings, Inc. with PNM Resources, Inc.; Approval of a General Diversification Plan; and All Other Authorizations and Approvals Requires to Consummate and Implement this Transaction.

2020

Arizona 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 Ratemaking Purposes, to Fix a Just and Reasonable Return Thereon and to Approve Rate Schedules Designed to Develop Such Return.

Florida Docket No. 20200176-EI: In re: Petition by Duke Energy Florida, LLC for a Limited Proceeding to Approve Clean Energy Connection Program and Tariff and Stipulation.

Florida Docket No. 20200092-EI: In re: Storm Protection Plan Cost Recovery Clause.

Nevada Docket No. 20-05003: Application of Nevada Power Company d/b/a NV Energy Filed Under Advice Letter No. 504 to Establish Customer Price Stability Tariff Schedule No. CPST (the "Program") to Assist Certain Qualifying

Customers During the COVID-19 Pandemic and Economic Downturn, and to Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

Nevada Docket No. 20-05004: Application of Sierra Pacific Power Company d/b/a NV Energy Filed Under Advice Letter No. 629-E to Establish Customer Price Stability Tariff Schedule No. CPST (the “Program”) to Assist Certain Qualifying Customers During the COVID-19 Pandemic and Economic Downturn, and to Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

Utah Docket No. 20-035-04: Application of Rocky Mountain Power for the Authority to Increase its Retail Electric Utility Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Wyoming Docket No. 20000-578-ER-20: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$7.1 Million Per Year or 1.1 Percent, to Revise the Energy Cost Adjustment Mechanism, and to Discontinue Operations at Cholla Unit 4.

Virginia Case No. PUR-2020-00015: Application of Appalachian Power Company for a 2020 Triennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services Pursuant to §56-585.1 A of the Code of Virginia.

Oregon Docket No. UE 374: In the Matter of PacifiCorp d/b/a Pacific Power Request for a General Rate Revision.

Florida Docket No. 20200067-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

Florida Docket No. 20200069-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

Florida Docket No. 20200070-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company.

Florida Docket No. 20200071-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.

North Carolina Docket No. E-2, Sub 1219: Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Missouri Case No. ER-2019-0374: In the Matter of the Empire District Electric Company’s Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area.

North Carolina Docket No. E-7, Sub 1214: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Texas Docket No. 49831: Application of Southwestern Public Service Company for Authority to Change Rates.

2019

Missouri Case No. ER-2019-0335: In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Decrease its Revenues for Electric Service.

Michigan Case No. U-20561: 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.

Indiana Cause No. 45253: Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code §§ 8-1-2-42.7 and 8-1-2-61, For (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Step-In of New Rates and Charges Using a Forecasted Test Period; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of a Federal Mandate Certificate Under Ind. Code § 8-1-8.4-1; (4) Approval of

Revised Electric Depreciation Rates Applicable to its Electric Plant in Service; (5) Approval of Necessary and Appropriate Accounting Deferral Relief; and (6) Approval of a Revenue Decoupling Mechanism for Certain Customer Classes.

Arizona Docket No. E-01933A-19-0228: In the Matter of the Application of Tucson Electric Power Company for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of Tucson Electric Power Company Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

Georgia Docket No. 42516: In Re: Georgia Power's 2019 Rate Case.

Colorado Proceeding No. 19AL-0268E: Re: In the Matter of Advice No. 1797-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8-Electric Tariff to Implement Rate Changes Effective on Thirty Days' Notice.

New York Case No. 19-E-0378: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Electric Service.

New York Case No. 19-E-0380: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Electric Service.

Maryland Case No. 9610: In the Matter of the Application of Baltimore Gas and Electric Company for Adjustments to its Electric and Gas Base Rates.

Nevada Docket No. 19-06002: In the Matter of the Application by Sierra Pacific Power Company, D/B/A NV Energy, Filed Pursuant to NRS 704.110(3) and NRS 704.110(4), Addressing its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers.

Florida Docket No. 20190061-EI: In Re: Petition of Florida Power & Light Company for Approval of FPL SolarTogether Program and Tariff.

Wisconsin Docket No. 6690-UR-126: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates – Test Year 2020.

Wisconsin Docket No. 5-UR-109: Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas, and Steam Rates – Test Year 2020.

New Mexico Case No. 19-00158-UT: In the Matter of the Application of Public Service Company of New Mexico for Approval of PNM Solar Direct Voluntary Renewable Energy Program, Power Purchase Agreement, and Advice Notice Nos. 560 and 561.

Indiana Cause No. 45235: Petition of Indiana Michigan Power Company, and Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service through a Phase In Rate Adjustment; and for Approval of Related Relief Including: (1) Revised Depreciation Rates; (2) Accounting Relief; (3) Inclusion in Rate Base of Qualified Pollution Control Property and Clean Energy Project; (4) Enhancements to the Dry Sorbent Injection System; (5) Advanced Metering Infrastructure; (6) Rate Adjustment Mechanism Proposals; and (7) New Schedules of Rates, Rules and Regulations.

Iowa Docket No. RPU-2019-0001: In Re: Interstate Power and Light Company.

Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates.

Arkansas Docket No. 19-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Virginia Case No. PUR-2019-00050: Application of Virginia Electric and Power Company for Determination of the Fair Rate of Return on Common Equity Pursuant to § 56-585.1:1 of the Code of Virginia.

Indiana Docket No. 45159: Petition of Northern Indiana Public Service Company LLC Pursuant to Indiana Code §§ 8-1-2-42.7, 8-1-2-61 and Indiana Code §§ 1-2.5-6 for (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Phase In of Rates; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of Revised Common and Electric Depreciation Rates Applicable to its Electric Plant in Service; (4) Approval of Necessary and Appropriate Accounting Relief; and (5) Approval of a New Service Structure for Industrial Rates.

Texas Docket No. 49421: Application of Centerpoint Energy Houston Electric, LLC for Authority to Change Rates.

Nevada Docket No. 18-11015: Re: Application of Nevada Power Company d/b/a NV Energy, Filed Under Advice No. 491, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Nevada Docket No. 18-11016: Re: Application of Sierra Pacific Power Company d/b/a NV Energy, Filed Under Advice No. 614-E, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Georgia Docket No. 42310: In Re: Georgia Power Company's 2019 Integrated Resource Plan and Application for Certification of Capacity From Plant Scherer Unit 3 and Plant Goat Rock Units 9-12 and Application for Decertification of Plant Hammond Units 1-4, Plant McIntosh Unit 1, Plant Langdale Units 5-6, Plant Riverview Units 1-2, and Plant Estatoah Unit 1.

Wyoming Docket Nos. 20003-177-ET-18: In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy For Approval to Implement a Renewable Ready Service Tariff.

South Carolina Docket No. 2018-318-E: In the Matter of the Application of Duke Energy Progress, LLC For Adjustments in Electric Rate Schedules and Tariffs.

Montana Docket No. D2018.2.12: Application for Authority to Increase Retail Electric Utility Service Rates and for Approval of Electric Service Schedules and Rules and Allocated Cost of Service and Rate Design.

Louisiana Docket No. U-35019: In Re: Application of Entergy Louisiana, LLC for Authorization to Make Available Experimental Renewable Option and Rate Schedule ERO.

Arkansas Docket No. 18-037-TF: In the Matter of the Petition of Entergy Arkansas, Inc. For Its Solar Energy Purchase Option.

2018

South Carolina Docket No. 2017-370-E: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for Review and Approval of a Proposed Business Combination Between SCANA Corporation and Dominion Energy, Inc., as may be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans.

Kansas Docket No. 18-KCPE-480-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Virginia Case No. PUR-2017-00173: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Virginia Case No. PUR-2017-00174: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Oregon Docket No. UM 1953: In the Matter of Portland General Electric Company, Investigation into Proposed Green Tariff.

Virginia Case No. PUR-2017-00179: Application of Appalachian Power Company for Approval of an 100% Renewable Energy Rider Pursuant to § 56-577.A.5 of the Code of Virginia.

Missouri Docket No. ER-2018-0145: In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.

Missouri Docket No. ER-2018-0146: In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.

Kansas Docket No. 18-WSEE-328-RTS: In the Matter of the Joint Application of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Oregon Docket No. UE 335: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

North Dakota Case No. PU-17-398: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in North Dakota.

Virginia Case No. PUR-2017-00179: Application of Appalachian Power Company for Approval of an 100 Percent Renewable Energy Rider Pursuant to § 56-577 A 5 of the Code of Virginia.

Missouri Case No. ET-2018-0063: In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff.

New Mexico Case No. 17-00255-UT: In the Matter of Southwestern Public Service Company's Application for Revision of its Retail Rates Under Advice Notice No. 272.

Virginia Case No. PUR-2017-00157: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs for Residential and Non-Residential Customers.

Kansas Docket No. 18-KCPE-095-MER: In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Merger of Westar Energy, Inc. and Great Plains Energy Incorporated.

North Carolina Docket No. E-7, Sub 1146: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Louisiana Docket No. U-34619: In Re: Application for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or/1994 General Orders.

Missouri Case No. EM-2018-0012: In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.

2017

Arkansas Docket No. 17-038-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire a Wind Generating Facility and to Construct a Dedicated Generation Tie Line.

Texas Docket No. 47461: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project.

Oklahoma Cause No. PUD 201700267: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Wind Catcher Energy Connection Project; A Determination There is Need for the Project; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the Project;

Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

Nevada Docket No. 17-06003: In the Matter of the Application of Nevada Power Company, d/b/a NV Energy, Filed Pursuant to NRS 704.110(3) and (4), Addressing Its Annual Revenue Requirement for General Rates Charged to All Classes of Customers.

North Carolina Docket No. E-2, Sub 1142: In the Matter of the Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Oklahoma Cause No. PUD 201700151: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

Kentucky Case No. 2017-00179: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2017 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; (4) an Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) an Order Granting All Other Requested Relief.

New York Case No. 17-E-0238: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Niagara Mohawk Power Corporation for Electric and Gas Service.

Virginia Case No. PUR-2017-00060: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

New Jersey Docket No. ER17030308: In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, for Approval of a Grid Resiliency Initiative and Cost Recovery Related Thereto, and for Other Appropriate Relief.

Texas Docket No. 46831: Application of El Paso Electric Company to Change Rates.

Oregon Docket No. UE 319: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

New Mexico Case No. 16-00276-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice No. 533.

Minnesota Docket No. E015/GR-16-664: In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota.

Ohio Case No. 16-1852-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, In the Form of an Electric Security Plan.

Texas Docket No. 46449: Application of Southwestern Electric Power Company for Authority to Change Rates.

Arkansas Docket No. 16-052-U: In the Matter of the Application of Oklahoma Gas and Electric Company for Approval of a General Change in Rates, Charges, and Tariffs.

Missouri Case No. EA-2016-0358: In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345 kV Transmission Line.

Florida Docket No. 160186-Ei: In Re: Petition for Increase in Rates by Gulf Power Company.

2016

Missouri Case No. ER-2016-0179: In the Matter of Union Electric Company d/b/a Ameren Missouri Tariffs to Increase its Revenues for Electric Service.

Kansas Docket No. 16-KCPE-593-ACQ: In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Acquisition of Westar Energy, Inc. by Great Plains Energy Incorporated.

Missouri Case No. EA-2016-0208: In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Offer a Pilot Distributed Solar Program and File Associated Tariff.

Utah Docket No. 16-035-T09: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 34, Renewable Energy Tariff.

Pennsylvania Public Utility Commission Docket No. R-2016-2537359: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537352: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537355: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2016-2537349: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Michigan Case No. U-17990: In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Florida Docket No. 160021-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.

Minnesota Docket No. E-002/GR-15-816: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota.

Colorado Public Utilities Commission Docket No. 16AL-0048E: Re: In the Matter of Advice Letter No. 1712-Electric Filed by Public Service Company of Colorado to Replace Colorado PUC No.7-Electric Tariff with Colorado PUC No. 8-Electric Tariff.

Colorado Public Utilities Commission Docket No. 16A-0055E: Re: In the Matter of the Application of Public Service Company of Colorado for Approval of its Solar*Connect Program.

Missouri Public Service Commission Case No. ER-2016-0023: In the Matter of the Empire District Electric Company of Joplin, Missouri for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company.

Georgia Public Service Commission Docket No. 40161: In Re: Georgia Power Company's 2016 Integrated Resource Plan and Application for Decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT, and Intercession City CT.

Oklahoma Corporation Commission Cause No. PUD 201500273: In the Matter of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

New Mexico Case No. 15-00261-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 513.

2015

Indiana Utility Regulatory Commission Cause No. 44688: Petition of Northern Indiana Public Service Company for Authority to Modify its Rates and Charges for Electric Utility Service and for Approval of: (1) Changes to its Electric Service Tariff Including a New Schedule of Rates and Charges and Changes to the General Rules and Regulations and Certain Riders; (2) Revised Depreciation Accrual Rates; (3) Inclusion in its Basic Rates and Charges of the Costs Associated with Certain Previously Approved Qualified Pollution Control Property, Clean Coal Technology, Clean Energy Projects and Federally Mandated Compliance Projects; and (4) Accounting Relief to Allow NIPSCO to Defer, as a Regulatory Asset or Liability, Certain Costs for Recovery in a Future Proceeding.

Public Utility Commission of Texas Docket No. 44941: Application of El Paso Electric Company to Change Rates.

Arizona Corporation Commission Docket No. E-04204A-15-0142: In the matter of the Application of UNS Electric, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realized a Reasonable Rate of Return on the Fair Value of the Properties of UNS Electric, Inc. Devoted to its Operations Throughout the State of Arizona, and for Related Approvals.

Rhode Island Public Utilities Commission Docket No. 4568: In Re: National Grid's Rate Design Plan.

Oklahoma Corporation Commission Cause No. PUD 201500208: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

Public Service Commission of Wisconsin Docket No. 4220-UR-121: Application of Northern States Power Company, A Wisconsin Corporation, for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-015-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

New York Public Service Commission Case No. 15-E-0283: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Electric Service.

New York Public Service Commission Case No. 15-G-0284: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Gas Service.

New York Public Service Commission Case No. 15-E-0285: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Electric Service.

New York Public Service Commission Case No. 15-G-0286: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Gas Service.

Public Utilities Commission of Ohio Case No. 14-1693-EL-RDR: In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter Into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider.

Public Service Commission of Wisconsin Docket No. 6690-UR-124: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-034-U: In the Matter of an Interim Rate Schedule of Oklahoma Gas and Electric Company Imposing a Surcharge to Recover All Investments and Expenses Incurred Through Compliance with Legislative or Administrative Rules, Regulations, or Requirements Relating to the Public Health, Safety or the Environment Under the Federal Clean Air Act for Certain of its Existing Generation Facilities.

Kansas Corporation Commission Docket No. 15-WSEE-115-RTS: In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company to Make Certain Changes in their Charges for Electric Service.

Michigan Public Service Commission Case No. U-17767: 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.

Public Utility Commission of Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.

Kansas Corporation Commission Docket No. 15-KCPE-116-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Michigan Case No. U-17735: In the Matter of the Application of the Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2014 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; and (4) an Order Granting All Other Required Approvals and Relief.

Kentucky Public Service Commission Case No. 2014-00371: In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates.

Kentucky Public Service Commission Case No. 2014-00372: In the Matter of the Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates.

2014

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

West Virginia Case No. 14-1152-E-42T: Appalachian Power Company and Wheeling Power Company, Both d/b/a American Electric Power, Joint Application for Rate Increases and Changes in Tariff Provisions.

Oklahoma Corporation Commission Cause No. PUD 201400229: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Authorization of a Plan to Comply with the Federal Clean Air Act and Cost Recovery; and for Approval of the Mustang Modernization Plan.

Missouri Public Service Commission Case No. ER-2014-0258: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase its Revenues for Electric Service.

Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Washington Utilities and Transportation Commission Docket No. UE-141368: In the Matter of the Petition of Puget Sound Energy to Update Methodologies Used to Allocate Electric Cost of Service and For Electric Rate Design Purposes.

Washington Utilities and Transportation Commission Docket No. UE-140762: 2014 Pacific Power & Light Company General Rate Case.

West Virginia Public Service Commission Case No. 14-0702-E-42T: Monongahela Power Company and the Potomac Edison Company Rule 42T Tariff Filing to Increase Rates and Charges.

Ohio Public Utilities Commission Case No. 14-841-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of Case No. 14-841-EL-SSO an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 14AL-0660E: Re: In the Matter of the Advice Letter No. 1672-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective July 18, 2014.

Maryland Case No. 9355: In the Matter of the Application of Baltimore Gas and Electric Company for Authority to Increase Existing Rates and Charges for Electric and Gas Service.

Mississippi Public Service Commission Docket No. 2014-UN-132: In Re: Notice of Intent of Entergy Mississippi, Inc. to Modernize Rates to Support Economic Development, Power Procurement, and Continued Investment.

Nevada Public Utilities Commission Docket No. 14-05004: Application of Nevada Power Company d/b/a NV Energy for Authority to Increase its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Utah Public Service Commission Docket No. 14-035-T02: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service From Renewable Energy Facilities.

Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.

Public Service Commission of Wisconsin Docket No. 6690-UR-123: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Connecticut Docket No. 14-05-06: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Virginia Corporation Commission Case No. PUE-2014-00026: Application of Appalachian Power Company for a 2014 Biennial Review for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Virginia Corporation Commission Case No. PUE-2014-00033: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to Va. Code § 56-249.6.

Arizona Corporation Commission Docket No. E-01345A-11-0224 (Four Corners Phase): In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Minnesota Public Utilities Commission Docket No. E-002/GR-13-868: In the Matter of the Application of Northern States Power Company, for Authority to Increase Rates for Electric Service in Minnesota.

Utah Public Service Commission Docket No. 13-035-184: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Missouri Public Service Commission Case No. EC-2014-0224: In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service.

Oklahoma Corporation Commission Cause No. PUD 201300217: Application of Public Service Company of Oklahoma to be in Compliance with Order No. 591185 Issued in Cause No. PUD 201100106 Which Requires a Base Rate Case to be Filed by PSO and the Resulting Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Public Utilities Commission of Ohio Case No. 13-2386-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.

2013

Oklahoma Corporation Commission Cause No. PUD 201300201: Application of Public Service Company of Oklahoma for Commission Authorization of a Standby and Supplemental Service Rate Schedule.

Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.

Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.

Public Utility Commission of Oregon Docket No. UE 267: In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out.

Illinois Commerce Commission Docket No. 13-0387: Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5 of the Public Utilities Act.

Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.

South Dakota Public Utilities Commission Docket No. EL12-061: In the Matter of the Application of Black Hills Power, Inc. for Authority to Increase its Electric Rates. (filed with confidential stipulation)

Kansas Corporation Commission Docket No. 13-WSEE-629-RTS: In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Public Utility Commission of Oregon Docket No. UE 263: In the Matter of PACIFICORP, dba PACIFIC POWER, Request for a General Rate Revision.

Arkansas Public Service Commission 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.

Virginia State Corporation Commission Docket No. PUE-2013-00020: Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Florida Public Service Commission Docket No. 130040-EI: Petition for Rate Increase by Tampa Electric Company.

South Carolina Public Service Commission Docket No. 2013-59-E: Application of Duke Energy Carolinas, LLC, for Authority to Adjust and Increase Its Electric Rates and Charges.

Public Utility Commission of Oregon Docket No. UE 262: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

New Jersey Board of Public Utilities Docket No. ER12111052: In the Matter of the Verified Petition of Jersey Central Power & Light Company For Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith; and for Approval of an Accelerated Reliability Enhancement Program ("2012 Base Rate Filing")

North Carolina Utilities Commission Docket No. E-7, Sub 1026: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Public Utility Commission of Oregon Docket No. UE 264: PACIFICORP, dba PACIFIC POWER, 2014 Transition Adjustment Mechanism.

Public Utilities Commission of California Docket No. 12-12-002: Application of Pacific Gas and Electric Company for 2013 Rate Design Window Proceeding.

Public Utilities Commission of Ohio Docket Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR: In the Matter of the Application of the Dayton Power and Light Company Approval of its Market Offer.

Minnesota Public Utilities Commission Docket No. E-002/GR-12-961: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

North Carolina Utilities Commission Docket E-2, Sub 1023: In the Matter of Application of Progress Energy Carolinas, Inc. For Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

2012

Public Utility Commission of Texas Docket No. 40443: Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2012-218-E: Application of South Carolina Electric & Gas Company for Increases and Adjustments in Electric Rate Schedules and Tariffs and Request for Mid-Period Reduction in Base Rates for Fuel.

Kansas Corporation Commission Docket No. 12-KCPE-764-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Kansas Corporation Commission Docket No. 12-GIMX-337-GIV: In the Matter of a General Investigation of Energy-Efficiency Policies for Utility Sponsored Energy Efficiency Programs.

Florida Public Service Commission Docket No. 120015-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.

California Public Utilities Commission Docket No. A.11-10-002: Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Utah Public Service Commission Docket No. 11-035-200: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Virginia State Corporation Commission Case No. PUE-2012-00051: Application of Appalachian Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

Public Utility Commission of Texas Docket No. 39896: Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs.

Missouri Public Service Commission Case No. EO-2012-0009: In the Matter of KCP&L Greater Missouri Operations Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism.

Colorado Public Utilities Commission Docket No. 11AL-947E: In the Matter of Advice Letter No. 1597-Electric Filed

by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Changes Effective December 23, 2011.

Illinois Commerce Commission Docket No. 11-0721: Commonwealth Edison Company Tariffs and Charges Submitted Pursuant to Section 16-108.5 of the Public Utilities Act.

Public Utility Commission of Texas Docket No. 38951: Application of Entergy Texas, Inc. for Approval of Competitive Generation Service tariff (Issues Severed from Docket No. 37744).

California Public Utilities Commission Docket No. A.11-06-007: Southern California Edison's General Rate Case, Phase 2.

2011

Arizona Corporation Commission Docket No. E-01345A-11-0224: In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Oklahoma Corporation Commission Cause No. PUD 201100087: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

South Carolina Public Service Commission Docket No. 2011-271-E: Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates and Charges.

Pennsylvania Public Utility Commission Docket No. P-2011-2256365: Petition of PPL Electric Utilities Corporation for Approval to Implement Reconciliation Rider for Default Supply Service.

North Carolina Utilities Commission Docket No. E-7, Sub 989: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Florida Public Service Commission Docket No. 110138: In Re: Petition for Increase in Rates by Gulf Power Company.

Public Utilities Commission of Nevada Docket No. 11-06006: In the Matter of the Application of Nevada Power Company, filed pursuant to NRS 704.110(3) for authority to increase its annual revenue requirement for general rates charged to all classes of customers to recover the costs of constructing the Harry Allen Combined Cycle plant and other generating, transmission, and distribution plant additions, to reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

North Carolina Utilities Commission Docket Nos. E-2, Sub 998 and E-7, Sub 986: In the Matter of the Application of Duke Energy Corporation and Progress Energy, Inc., to Engage in a Business Combination Transaction and to Address Regulatory Conditions and Codes of Conduct.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

Virginia State Corporation Commission Case No. PUE-2011-00037: In the Matter of Appalachian Power Company for a 2011 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Illinois Commerce Commission Docket No. 11-0279 and 11-0282 (cons.): Ameren Illinois Company Proposed General Increase in Electric Delivery Service and Ameren Illinois Company Proposed General Increase in Gas Delivery Service.

Virginia State Corporation Commission Case No. PUE-2011-00045: Application of Virginia Electric and Power

Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Utah Public Service Commission Docket No. 10-035-124: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Maryland Public Utilities Commission Case No. 9249: In the Matter of the Application of Delmarva Power & Light for an Increase in its Retail Rates for the Distribution of Electric Energy.

Minnesota Public Utilities Commission Docket No. E002/GR-10-971: In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota.

Michigan Public Service Commission Case No. U-16472: In the Matter of the Detroit Edison 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.

2010

Public Utilities Commission of Ohio Docket No. 10-2586-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 10A-554EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its DSM Plan, Including Long-Term Electric Energy Savings Goals, and Incentives.

Public Service Commission of West Virginia Case No. 10-0699-E-42T: Appalachian Power Company and Wheeling Power Company Rule 42T Application to Increase Electric Rates.

Oklahoma Corporation Commission Cause No. PUD 201000050: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Georgia Public Service Commission Docket No. 31958-U: In Re: Georgia Power Company's 2010 Rate Case.

Washington Utilities and Transportation Commission Docket No. UE-100749: 2010 Pacific Power & Light Company General Rate Case.

Colorado Public Utilities Commission Docket No. 10M-254E: In the Matter of Commission Consideration of Black Hills Energy's Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Colorado Public Utilities Commission 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."

Public Service Commission of Utah Docket No. 09-035-15 *Phase II*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Utility Commission of Oregon Docket No. UE 217: In the Matter of PACIFICORP, dba PACIFIC POWER Request for a General Rate Revision.

Mississippi Public Service Commission Docket No. 2010-AD-57: In Re: Proposal of the Mississippi Public Service Commission to Possibly Amend Certain Rules of Practice and Procedure.

Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET SEQ.* and 8-1-2-42 (a); Authority to Defer Program Costs

Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

Public Utility Commission of Texas Docket No. 37744: Application of Entergy Texas, Inc. for Authority to Change Rates and to Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2009-489-E: Application of South Carolina Electric & Gas Company for Adjustments and Increases in Electric Rate Schedules and Tariffs.

Kentucky Public Service Commission Case No. 2009-00459: In the Matter of General Adjustments in Electric Rates of Kentucky Power Company.

Virginia State Corporation Commission Case No. PUE-2009-00125: For acquisition of natural gas facilities Pursuant to § 56-265.4:5 B of the Virginia Code.

Arkansas Public Service Commission Docket No. 10-010-U: In the Matter of a Notice of Inquiry Into Energy Efficiency.

Connecticut Department of Public Utility Control Docket No. 09-12-05: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Arkansas Public Service Commission 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.

Missouri Public Service Commission Docket No. ER-2010-0036: In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Public Service Commission of Delaware Docket No. 09-414: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15 *Phase I*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Oklahoma Corporation Commission Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the 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.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

2008

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

2007

Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

2006

Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

2005

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

2004

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

TESTIMONY BEFORE LEGISLATIVE BODIES

2020

Regarding Missouri Senate Joint Resolution 34: Written testimony submitted to the Missouri Senate Transportation, Infrastructure and Public Safety Committee, January 30, 2020.

2019

Regarding North Carolina Senate Bill 559: Written testimony submitted to the North Carolina Committee on Agriculture/Environment/Natural Resources, April 17, 2019.

Regarding Missouri Senate Joint Resolution 25: Written testimony submitted to the Missouri Senate Committee on Judiciary, March 28, 2019.

Regarding South Carolina House Bill 3659: Written testimony submitted to the South Carolina Senate Committee on Judiciary, March 14, 2019.

Regarding Kansas Senate Bill 69: Written testimony submitted to the Kansas Committee on Utilities, February 19, 2019.

2018

Regarding Missouri Senate Bill 564: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 10, 2018.

2017

Regarding Missouri Senate Bill 190: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 25, 2017.

2016

Regarding Missouri House Bill 1726: Testimony before the Missouri House Energy and Environment Committee, April 26, 2016.

2014

Regarding Kansas House Bill 2460: Testimony Before the Kansas House Standing Committee on Utilities and Telecommunications, February 12, 2014.

2012

Regarding Missouri House Bill 1488: Testimony Before the Missouri House Committee on Utilities, February 7, 2012.

2011

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs,

Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

AFFIDAVITS

2015

Supreme Court of Illinois, Docket No. 118129, Commonwealth Edison Company et al., respondents, v. Illinois Commerce Commission et al. (Illinois Competitive Energy Association et al., petitioners). Leave to appeal, Appellate Court, First District.

2011

Colorado Public Utilities Commission Docket No. 11M-951E: In the Matter of the Petition of Public Service Company of Colorado Pursuant to C.R.S. § 40-6-111(1)(d) for Interim Rate Relief Effective on or before January 21, 2012.

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

Speaker, Supporting Walmart's Regenerative Journey, Edison Electric Institute National Key Accounts Workshop, New Orleans, Louisiana, March 21, 2022.

Speaker, Walmart and the Co-ops: The Value of Partnership, Texas Electric Cooperatives 22nd Annual Directors Conference, January 11, 2022.

Speaker, Walmart and the Co-ops: The Value of Partnership, Texas Electric Cooperatives Managers Conference, December 2, 2021.

Panelist, Industry Priorities for Building Renewable Infrastructure, ACORE Grid Forum, November 3, 2021.

Panelist, Achieving a 100% Carbon Free Energy Economy, Edison Electric Institute National Key Accounts Workshop, Long Beach, California, October 25, 2021.

Panelist, Public Private Partnerships: How Utilities and Customers are Working Together for a More Sustainable Future, Arkansas Advanced Energy Association Empower Arkansas, Little Rock, Arkansas, October 14, 2021.

Panelist, Understanding Nontraditional Stakeholders, University of Idaho Energy Executive Summit, Austin, Texas, October 12, 2021.

Panelist, US City & Corporate Clean Energy Procurement and its Role in Achieving the Paris Agreement's Goals, United States Environmental Protection Agency, September 1, 2021.

Panelist, WalStreet Fireside Chat – Future of Energy, Bentonville Chamber of Commerce, July 27, 2021.

Panelist, Corporate Customer Partnerships, EEI 2021: The Road to Net Zero, June 9, 2021.

Panelist, Counting to Clean: Corporate Sustainability and Renewable Energy, Energy Bar Association, May 12, 2021.

Speaker, Designing a Customer-Centric Clean Energy Standard, REBA Connect 2021 Virtual Member Summit, May 11, 2021.

Panelist, Delivering 100% Carbon Free Energy: Options & Issues, Northwestern Center on Law, Business, and Economics, March 16, 2021.

Electric Company Updates and Discussion on Best Practices for Serving National Corporate Customers Webinar, Edison Electric Institute, March 9, 2021.

Panelist, ComEd Fleet Electrification Webinar, December 10, 2020.

Panelist, Corporate Offtaker Perspectives Panel, Southeast Renewable Energy Summit, November 18, 2020.

Panelist, EEI National Key Accounts – Connections that Mean Business for Corporate Customers, EEI Fall National Key Accounts Workshop, October 28, 2020.

Panelist, COVID-19, a Catalyzer or a Barrier to Decarbonization?, Power & Renewables Summit 2020, September 28, 2020.

Panelist, What Organized Markets Can Do for You, REBA Connect: Virtual Member Summit 2020, June 2, 2020.

Panelist, Expanding Future Procurement Options, REBA Connect: Virtual Member Summit 2020, May 13, 2020.

Panelist, Renewable Energy Options for Large Utility Customers, NARUC Center for Partnership & Innovation Webinar Series, January 16, 2020.

Panelist, Pathways to Integrating Customer Clean Energy Demand in Utility Planning, REBA: Market Innovation webinar, January 13, 2020.

Panelist, Should Full Electrification of Energy Systems be Our Goal? If it's No Longer Business as Usual, What Does That Mean for Consumers?, National Association of State Utility Consumer Advocates 2019 Annual Meeting, San Antonio, Texas, November 18, 2019.

Panelist, Fleet Electrification, Federal Utility Partnership Working Group Seminar, Washington, DC, November 8, 2019.

Panelist, Tackling the Challenges of Extreme Weather, Edison Electric Institute Fall National Key Accounts Workshop, Las Vegas, Nevada, October 8, 2019.

Panelist, Fleet Electrification: Tackling the Challenges and Seizing the Opportunities for Electric Trucks, Powering the People 2019, Washington, D.C., September 24, 2019.

Panelist, From the Consumer Perspective, Mid-American Regulatory Conference 2019 Annual Meeting, Des Moines, Iowa, August 13, 2019.

Panelist, Redefining Resiliency: Emerging Technologies Benefiting Customers and the Grid, EPRI 2019 Summer Seminar, Chicago, Illinois, August 12, 2019.

Panelist, Energy Policies for Economic Growth, 2019 Energy Policy Summit, NCSL Legislative Summit, Nashville, Tennessee, August 5, 2019.

Panelist, Gateway to Energy Empowerment for Customers, Illumination Energy Summit, Columbus, Ohio, May 15, 2019.

Panelist, Advancing Clean Energy Solutions Through Stakeholder Collaborations, 2019 State Energy Conference of North Carolina, Raleigh, North Carolina, May 1, 2019.

Panelist, Fleet Electrification: Getting Ready for the Transition, Edison Electric Institute Spring National Key Accounts Workshop, Seattle, Washington, April 8, 2019.

Panelist, Where the Fleet Meets the Pavement, Which Way to Electrification of the U.S. Transportation System?, Washington, D.C., April 4, 2019.

Panelist, Improving Renewable Energy Offerings: What Have We Learned?, Advanced Energy Economy Webinar, March 26, 2019.

Speaker, National Governors Association Southeast Regional Transportation Electrification Workshop, Nashville, Tennessee, March 11, 2019.

Speaker, Walmart Spotlight: A Day in the Life of a National Energy Manager, Touchstone Energy Cooperatives Net Conference 2019, San Diego, California, February 12, 2019.

Panelist, National Accounts: The Struggle is Real, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Getting in Front of Customers Getting Behind the Meter Solutions, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Sustainable Fleets: The Road Ahead for Electrifying Fleet Operations, EEI National Key Accounts 2018 Fall Workshop, San Antonio, Texas, October 23, 2018.

Panelist, Meeting Corporate Clean Energy Requirements in Virginia, Renewable Energy Buyers Alliance Summit, Oakland, California, October 15, 2018.

Panelist, What Are the Anticipated Impacts on Pricing and Reliability in the Changing Markets?, Southwest Energy Conference, Phoenix, Arizona, September 21, 2018.

Speaker, Walmart's Project Gigaton – Driving Renewable Energy Sourcing in the Supply Chain, Smart Energy Decisions Webcast Series, July 11, 2018.

Panelist, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.

Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.

Panelist, The Past, Present, and Future of Renewable Energy: What Role Will PURPA, Mandates, and Collaboration Play as Renewables Become a Larger Part of Our Energy Mix?, 36th National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.

Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.

Panelist, Getting to Yes with Large Customers to Meet Sustainability Goals, The Edison Foundation Institute for Electric Innovation Powering the People, March 7, 2018.

Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.

Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.

Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.

Panelist, Energy and Climate Change, 2017-18 Arkansas Law Review Symposium: Environmental Sustainability and Private Governance, Fayetteville, Arkansas, October 27, 2017.

Panelist, Customer – Electric Company – Regulator Panel, Edison Electric Institute Fall National Key Accounts Workshop, National Harbor, Maryland, October 12, 2017.

Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.

Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.

Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.

Panelist, Transitioning Away from Traditional Utilities, Utah Association of Energy Users Annual Conference, Salt Lake City, Utah, May 18, 2017.

Panelist, Regulatory Approaches for Integrating and Facilitating DERs, New Mexico State University Center for Public Utilities Advisory Council Current Issues 2017, Santa Fe, New Mexico, April 25, 2017.

Presenter, Advancing Renewables in the Midwest, Columbia, Missouri, April 24, 2017.

Panelist, Leveraging New Energy Technologies to Improve Service and Reliability, Edison Electric Institute Spring National Key Accounts Workshop, Phoenix, Arizona, April 11, 2017.

Panelist, Private Sector Demand for Renewable Power, Vanderbilt Law School, Nashville, Tennessee, April 4, 2017.

Panelist, Expanding Solar Market Opportunities, 2017 Solar Power Colorado, Denver, Colorado, March 15, 2017.

Panelist, Renewables: Are Business Models Keeping Up?, Touchstone Energy Cooperatives NET Conference 2017, San Diego, California, January 30, 2017.

Panelist, The Business Case for Clean Energy, Minnesota Conservative Energy Forum, St. Paul, Minnesota, October 26, 2016.

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