BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:	**)**	
Georgia Power Company's	**)**	**Docket No. 44902**
Fuel Cost Recovery (FCR-26) Application	**)**	

Direct Testimony

of

Jeffry Pollock

On Behalf of

Georgia Association of Manufacturers

April 14, 2023

J. POLLOCK
INCORPORATED

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GLOSSARY OF ACRONYMS

Term	Definition
April 2023 Update	NYMEX Henry Hub Futures Contracts traded over the 20-day period from March 10 through April 6, 2023
February 2023 Update	NYMEX Henry Hub Futures Contracts traded over a 20-day period in early February 2023
FCR	Fuel Cost Recovery
GAM	Georgia Association of Manufacturers
GPC	Georgia Power Company
IFR	Interim Fuel Rider
kWh	Kilowatt-Hour
Summer 2022 Forecast	NYMEX Henry Hub Futures Contracts traded over the 20-day period from August 8 through September 2, 2022

DIRECT TESTIMONY OF JEFFRY POLLOCK

Introduction, Qualifications and Summary

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Jeffry Pollock; 12647 Olive Blvd., Suite 585, St. Louis, MO 63141.

Q WHAT IS YOUR OCCUPATION AND BY WHO ARE YOU EMPLOYED?

A I am an energy advisor and President of J. Pollock, Incorporated.

Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I have a Bachelor of Science Degree in Electrical Engineering and a Masters in Business Administration from Washington University in St. Louis, Missouri. Since graduation in 1975, I have been engaged in a variety of consulting assignments, including energy procurement and regulatory matters in both the United States and several Canadian provinces. My qualifications are documented in **Appendix A.** A list of my appearances is provided in **Appendix B** to this testimony.

Q ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A I am testifying on behalf of the Georgia Association of Manufacturers (GAM). The members of GAM are customers of Georgia Power Company (GPC). They consume large quantities of electricity, primarily for manufacturing under a variety of tariffs.

Q WHAT ISSUES ARE YOU ADDRESSING IN YOUR TESTIMONY?

A I shall present an overview of GPC's proposed FCR-26 rate. Because natural gas prices have plummeted since last summer and have continued to decline, I will quantify the impact of the much lower natural gas prices on the Part A rates. I then discuss the recovery of past under-collections under Part B. Finally, I address changes to the maximum adjustment under the Interim Fuel Rider (IFR) mechanism.

Q DOES THE FACT THAT YOU ARE NOT ADDRESSING ALL ISSUES IN THIS PROCEEDING CONSTITUTE AN ENDORSEMENT OF THE POSITIONS OF GEORGIA POWER COMPANY, OR OTHER PARTIES, ON THESE ISSUES?

A No. The fact that I am not addressing every issue should not be interpreted as an endorsement of GPC's or other parties' proposals in this proceeding.

Summary

Q PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.

A My findings and conclusions are as follows:

- GPC's proposed FCR-26 rate would result in a $1,511 million (or 19%) annual rate increase to retail customers affected by the FCR rate. Of the $1,511 million increase:
  - $481 million is attributable to Part A (recovery of projected fuel and purchase power costs);
  - $1,030 million is attributable to Part B (the recovery of past under-collections).
- The proposed Part A rates were based on a projection of natural gas futures prices made last summer. Since then, natural gas futures prices have plummeted by about 33%. Restating Part A using more recent natural gas futures prices would reduce GPC's proposed annual Part A increase by approximately $422 million (0.6153¢ per kilowatt-hour).
- The Part B increase is designed to recover a projected $2.6 billion under-collection from the FCR-25 test period over 36 months.
- The proposed FCR-26 increase would be in addition to the $214 million base rate increase implemented this year, the additional anticipated base revenue increases effective when Vogtle Unit Nos. 3 and 4 are placed in service later this year and in early 2024, and the subsequent base rate increases effective in 2024 and 2025 approved in GPC's last rate case. Given this perfect storm of rate increases, GPC's proposal to recover past under-collections over a 36-month period would further exacerbate the rate shock that GPC's customers are currently experiencing *and will continue to experience* over the next several years.

- Accordingly, to alleviate the upward pressure in rates, the recovery period in Part B should be extended from 36 months to *at least* five years. In addition to alleviating upward pressure on rates, extended recovery would be a lower cost option for customers because GPC's financing costs are much lower than the opportunity costs of capital for most consumers.
- GPC is proposing to increase the maximum adjustment allowed under the IFR mechanism from 15% to 40% above (or below) the currently-approved FCR rate. While GAM is supportive of the intent to provide more timely cost recovery and prevent the accumulation of a large under-(or over-) recovery balance, a 40% threshold could result in a substantial rate increase, particularly as the FCR rate trends higher.
- To mitigate the potential for a large fuel rate increase, the IFR threshold should be revised to reflect the lower of 40% or a 1¢ per kilowatt-hour (kWh) increase. GPC can always petition the Commission to subsequently raise or lower the FCR rate if, despite the cap on the IFR, the accumulated under-(or over-) recovery balance is projected to continue to increase above the $200 million threshold.

Overview

Q WHAT CHANGE IN FCR RATES IS GEORGIA POWER COMPANY PROPOSING IN THIS APPLICATION?

A The current and proposed FCR rates are shown in **Table 1**.

Table 1
Current Vs. Proposed FCR Rates
(In ¢ per kWh)

Description	Transmission	Primary	Secondary	System Average
Summer				
Present	2.8331	2.8591	2.8870	2.8724
Proposed	5.2906	5.3278	5.4249	5.3843
% Increase	87%	86%	88%	87%
Non-Summer				
Present	2.7715	2.7969	2.8241	2.8099
Proposed	4.7720	4.8055	4.8931	4.8565
% Increase	72%	72%	73%	73%

The current FCR rates include both FCR-25 and IFR-4.

As **Table 1** demonstrates, the proposed FCR-26 rates would be 73% (non-summer months) to 87% (summer months) higher than the current FCR rates. It would result in a $1,511 million (or 19%) annual rate increase on FCR-applicable sales.

Q WHAT ARE THE COMPONENTS OF THE PROPOSED FCR-26 RATE INCREASE?

A The components include:

- **Part A**: $481 million (6%) increase, which would recover the projected fuel and purchase power costs for the FCR-26 test period that begins on June 2023 and ends in May 2025.
- **Part B**: $1,030 million (13%) increase, which would recover an accumulated $2.6 billion projected under-collection accrued during the FCR-25 test period that ends in May 2023.[1]

Q WHAT IS THE PRIMARY DRIVER FOR THE PART A INCREASE?

A GPC's testimony discusses how continued high natural gas prices are a major driver of the proposed Part A increase. Specifically, natural gas is projected to account for 44% of total projected fuel costs during the FCR-26 test period.[2]

Q WHAT NATURAL GAS FORECAST WAS USED BY GEORGIA POWER COMPANY IN DETERMINING THE PART A INCREASE?

A GPC used a forecast of Henry Hub gas prices based on NYMEX futures settlements traded over the 20-day period from August 8 through September 2, 2022 (Summer 2022 forecast).

[1] The amount will be lower due to the fact that GPC experienced lower than projected natural gas prices prior to the FCR-26 test period.

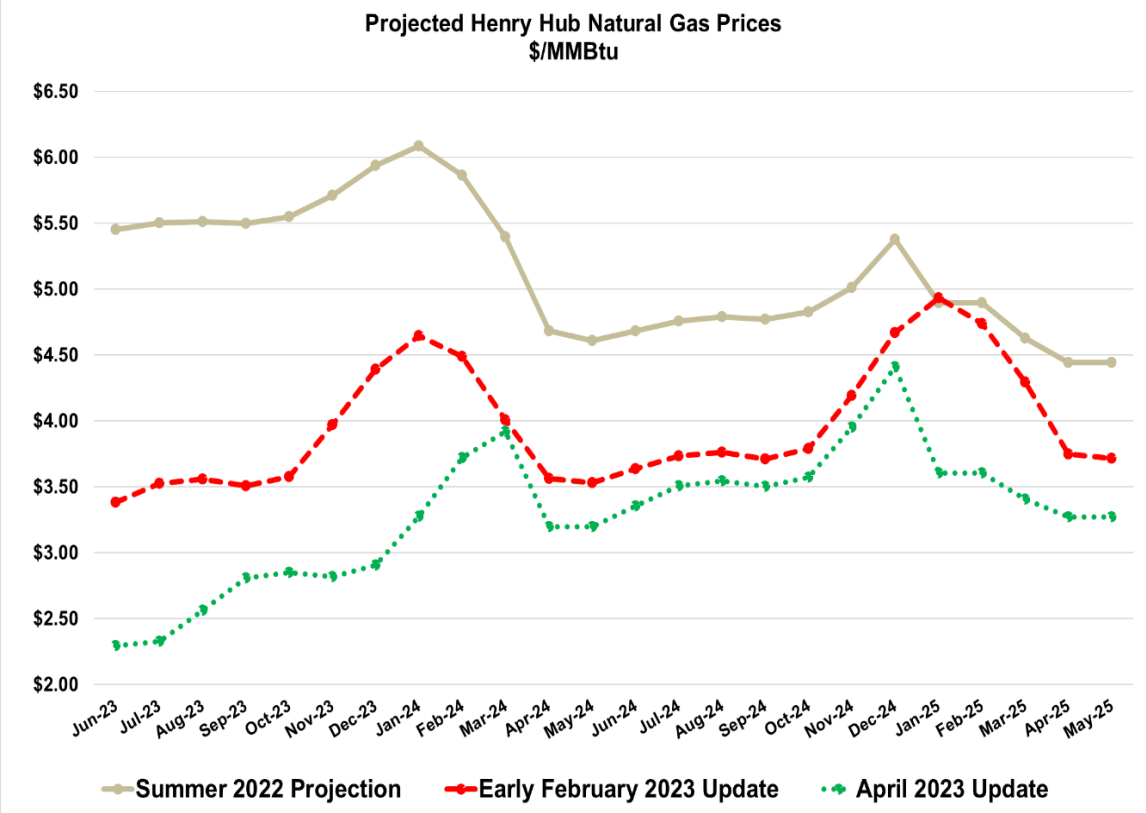
[2] Direct Testimony of Sarah P. Adams and Adam D. Houston at 19.

Q WHAT HAS HAPPENED TO NATURAL GAS PRICES SINCE GEORGIA POWER COMPANY'S SUMMER 2022 FORECAST?

A Since GPC's Summer 2022 forecast, natural gas prices have plummeted. This is shown in **Chart 1** below, which compares GPC's Summer 2022 projection (solid line) with two updated forecasts:

- GPC's updated forecast using NYMEX Henry Hub Futures Contracts traded over the 20-day period in early February (February 2023 Update): the dashed line; and
- A more recent forecast using NYMEX Henry Hub Futures Contracts traded over the 20-day period from March 10 through April 6, 2023 (April 2023 Update): the dotted line.

Chart 1



As can be seen, natural gas prices have plummeted since the Summer 2022 projection and have continued to decrease even since GPC's February 2023 Update.

This continued decline in natural gas prices is also shown in **Table 2**, which compares the gas futures prices under each of the three forecasts shown in **Chart 1**.

Table 2
Comparison of Projected NYMEX (Henry Hub) Gas Prices
$/MMBtu

Period	Summer 2022 Forecast	GPC Feb 2023 Update	April 2023 Update
Jun- Dec 2023	$5.60	$3.70	$2.99
CY 2024	$5.07	$3.98	$3.62
Jan - May 2025	$4.66	$4.29	$3.57*****
Impact on FCR-25 Test-Period Costs ($Millions)		-$536.2	-$845.3

Source: SPA_ADH Exhibit 3 and S&P Global Market Intelligence.
***** Substituting the AEO 2023 High Oil/Gas Supply Case would result in average gas price of $3.43/MMBtu.

Q WHAT WOULD BE THE IMPACT OF USING THE UPDATED (I.E. FEBRUARY AND APRIL FORECASTS) RATHER THAN GEORGIA POWER COMPANY'S SUMMER 2022 FORECAST?

A As **Table 2** demonstrates, using GPC's February 2023 Update would reduce test period FCR costs by $536.2 million, as compared to the filing. Similarly, using the April 2023 Update would reduce the test period FCR costs by $845.3 million.

Q HOW WOULD USING THE APRIL 2023 UPDATE AFFECT THE CHANGE IN THE FCR RATES?

A The FCR rates, based on the April 2023 updated gas price forecast are summarized in **Table 3**.

Table 3 FCR Rates Based on April Updated Gas Prices (In ¢ per kWh)				
Description	**Transmission**	**Primary**	**Secondary**	**System Average**
Summer				
Present	2.8331	2.8591	2.8870	2.8724
Proposed	4.5894	4.6216	4.7059	4.6707
% Increase	62%	62%	63%	63%
Non-Summer				
Present	2.7715	2.7969	2.8241	2.8099
Proposed	4.2263	4.2560	4.3336	4.3012
% Increase	51%	51%	52%	52%

The April 2023 Update would reduce GPC's proposed FCR rate increase by about 28% (or $422 million). Nevertheless, the FCR rates would increase significantly by between 52% (non-summer months) and 63% (summer months) due to Part B. This would result in a 13.6% annual rate increase on FCR-applicable sales.

Q WHAT IS THE SIGNIFICANCE OF A 13.6% ANNUAL RATE INCREASE?

A It is significant in light of the rate increases approved by the Commission in GPC's last rate case, as well as the upcoming base rate increases associated with the commercial operation of Vogtle Unit Nos. 3 and 4 later this year and in early 2024.

The Commission approved a three-step $991 million rate increase as a result of the 2022 base rate case. The first increase of $214 million went into effect in January 2023. The second and third step increases are estimated to be $375 million and $402 million, effective in January 2024 and January 2025, respectively.

Over the same period, GPC will be increasing base rates to recognize the commercial operation of Vogtle Unit Nos. 3 and 4. Based on estimates provided in the last rate case, the estimated base revenue requirement of Vogtle Unit Nos. 3 and 4 is approximately $800 million.

Given this perfect storm of rate increases, it would make sense to extend the recovery period for Part B for longer than three years.

Q WHAT ARE THE DRAWBACKS OF EXTENDING THE RECOVERY PERIOD FOR PART B BEYOND THE 36 MONTHS PROPOSED BY GEORGIA POWER COMPANY?

A The only drawback is that GPC will incur additional financing costs to carry the unamortized balance for a longer period. Historically, GPC's short-term debt rate was less than 1%. With the rise in interest rates, the short-term debt rate has risen to 5.15%. Even at the higher rate, GPC's short-term debt rate is far below the opportunity cost of capital for the vast majority of consumers. For example, credit card interest rates are currently above 19%. Further, mortgage rates in Georgia are averaging between 5.8% to 6.4% for 15-year and 30-year fixed mortgages, respectively. The higher opportunity cost of capital means that spreading Part B over a longer period than GPC is proposing would be less costly for consumers on a net present value basis.

Q WHAT DO YOU RECOMMEND?

A To mitigate rate shock, the Part B recovery period should be extended to *at least* five years. Extending the recovery period to five years would cut an additional $353 million (23%) from the proposed FCR annual rate increase. **Table 4** summarizes the

estimated FCR-26 rates with Part B recovered over five years. The FCR rates shown in **Table 4** would result in a $735.5 million (9.2%) annual revenue increase.

Table 4
FCR Rates Based on April Updated Gas Prices
Part B Recovery Extended to Five Years
(In ¢ per kWh)

Description	Transmission	Primary	Secondary	System Average
Summer				
Present	2.8331	2.8591	2.8870	2.8724
Proposed	4.0787	4.1073	4.1822	4.1509
% Increase	44%	44%	45%	45%
Non-Summer				
Present	2.7715	2.7969	2.8241	2.8099
Proposed	3.7241	3.7503	3.8187	3.7901
% Increase	34%	34%	35%	35%

IFR Adjustment

Q WHAT IS THE PURPOSE OF THE IFR MECHANISM?

A The IFR mechanism helps to mitigate the accumulation of a substantial under-(or over-) recovered fuel balance, thereby providing more timely cost recovery and stronger price signals.

Q WHAT CHANGE IS GEORGIA POWER COMPANY PROPOSING TO THE IFR MECHANISM IN THIS PROCEEDING?

A Responding to the recent past, GPC wants to raise the maximum amount by which fuel rates can be adjusted during an FCR cycle. Currently, IFR changes are limited to 15% above (or below) the approved FCR rates. GPC is proposing to change this amount to 40%.

Q WHAT IS PROMPTING THIS PROPOSED CHANGE?

A As discussed in GPC's testimony, natural gas prices are the largest single cost driver accounting for about $2.5 billion of higher fuel costs than were budgeted in FCR-25.[3] Thus, given its increasing reliance on natural gas generation, and the fact that gas prices can be volatile, GPC understandably wants to move more aggressively to prevent a large balance from accruing.

Q DO YOU HAVE ANY CONCERNS WITH THE PROPOSAL TO INCREASE THE MAXIMUM ADJUSTMENT FROM 15% TO 40%?

A Yes. As the FCR rates trend higher, the impact of a 40% versus a 15% adjustment becomes much more pronounced. For example, if the FCR rate were 2¢ per kWh, a 40% adjustment would limit the increase to 0.8¢ per kWh. However, with the FCR rate set at 4¢ per kWh, a 40% adjustment would raise the FCR rate by 1.6¢ per kWh. A 1.6¢ per kWh increase in the FCR rates would result in much larger rate increases.

Q WHAT DO YOU RECOMMEND?

A The IFR mechanism is important to mitigate the accumulation of significant over-(or under-)recovered fuel balances. However, it is also important to moderate fuel rate increases, especially when GPC is simultaneously increasing base rates from the last rate case and due to the completion of Vogtle Unit Nos. 3 and 4.

Thus, to mitigate the impact of future IFRs, the Commission should limit the maximum increase to *the lower of* 40% or 1¢ per kWh. By establishing a fixed per kWh cap, the Commission will help to alleviate the sudden rate changes resulting from

[3] *Id*. at 11.

unanticipated and unprecedented increases in fuel and purchased power costs, and will also provide a better balance between both GPC's and its customers' interests.

Q WHAT IF THE FUEL BALANCE CONTINUES TO WORSEN EVEN AFTER AN IFR IS IMPLEMENTED?

A GPC always has an opportunity to petition the Commission to reset the FCR rate if it determines that, despite the IFR, the balance will continue to increase above the $200 million threshold.

Conclusion

Q WHAT FINDINGS SHOULD THE COMMISSION MAKE BASED ON YOUR TESTIMONY?

A The Commission should make the following findings:

- Reject GPC's proposed Part A rate and set the Part A rate based on the April 2023 updated gas futures price forecast;
- Reject GPC's proposal to recover the Part B under-collection over 36 months and extend the recovery period to *at least* five years; and
- Raise the maximum increase by which fuel rates can be adjusted during an FCR cycle to the *lesser of* 40% or 1¢ per kWh.

Q DOES THIS CONCLUDE YOUR TESTIMONY?

A Yes.

APPENDIX A

Qualifications of Jeffry Pollock

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Jeffry Pollock. My business mailing address is 12647 Olive Blvd., Suite 585, St. Louis, Missouri 63141.

Q WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?

A I am an energy advisor and President of J. Pollock, Incorporated.

Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I have a Bachelor of Science Degree in Electrical Engineering and a Master's Degree in Business Administration from Washington University. I have also completed a Utility Finance and Accounting course.

Upon graduation in June 1975, I joined Drazen-Brubaker & Associates, Inc. (DBA). DBA was incorporated in 1972 assuming the utility rate and economic consulting activities of Drazen Associates, Inc., active since 1937. From April 1995 to November 2004, I was a managing principal at Brubaker & Associates (BAI).

During my career, I have been engaged in a wide range of consulting assignments including energy and regulatory matters in both the United States and several Canadian provinces. This includes preparing financial and economic studies of investor-owned, cooperative and municipal utilities on revenue requirements, cost of service and rate design, tariff review and analysis, conducting site evaluations, advising clients on electric restructuring issues, assisting clients to procure and manage electricity in both competitive and regulated markets, developing and issuing requests for proposals (RFPs), evaluating RFP responses and contract negotiation and developing and presenting seminars on electricity issues.

I have worked on various projects in 28 states and several Canadian provinces, and have testified before the Federal Energy Regulatory Commission, the Ontario Energy Board, and the state regulatory commissions of Alabama, Arizona, Arkansas, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, New Jersey, New Mexico, New York, Ohio, Pennsylvania, South Carolina, Texas, Virginia, Washington, and Wyoming. I have also appeared before the City of Austin Electric Utility Commission, the Board of Public Utilities of Kansas City, Kansas, the Board of Directors of the South Carolina Public Service Authority (a.k.a. Santee Cooper), the Bonneville Power Administration, Travis County (Texas) District Court, and the U.S. Federal District Court.

Q PLEASE DESCRIBE J. POLLOCK, INCORPORATED.

A J. Pollock assists clients to procure and manage energy in both regulated and competitive markets. The J. Pollock team also advises clients on energy and regulatory issues. Our clients include commercial, industrial and institutional energy consumers. J. Pollock is a registered broker and Class I aggregator in the State of Texas.

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

UTILITY	ON BEHALF OF	DOCKET	TYPE	STATE / PROVINCE	SUBJECT	DATE
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Stipulation Support	NM	Standby Service Rate Design	4/10/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	53931	Direct	TX	Fuel Reconciliation	3/3/2023
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC	RV Industry User's Group	45772	Cross-Answer	IN	Class Cost-of-Service Study; Class Revenue Allocation	2/16/2023
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Additional Testimony	IA	Application of Advance Ratemaking Principles to Wind Prime	2/13/2023
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	54234	Direct	TX	Interim Fuel Surcharge	1/24/2023
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC	RV Industry User's Group	45772	Direct	IN	Class Cost-of-Service Study; Class Revenue Allocation	1/20/2023
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Surrebuttal	IA	Application of Advance Ratemaking Principles to Wind Prime	1/17/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	54282	Direct	TX	Interm Net Surcharge for Under-Collected Fuel Costs	1/4/2023
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Surrebuttal	SC	Allocation Method for Production and Transmission Plant and Related Expenses	12/22/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Surrebuttal	MN	Cost Allocation; Sales True-Up	12/6/2022
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Direct	SC	Treatment of Curtailable Load; Allocation Methodology	12/1/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Rebuttal	NM	Standby Service Rate Design	11/22/2022
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Additional Direct & Rebuttal	IA	Application of Advance Ratemaking Principles to Wind Prime	11/21/2022
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	53719	Cross	TX	Retiring Plant Rate Rider	11/16/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Rebuttal	MN	Class Cost-of-Service Study; Distribution System Costs; Transmission System Costs; Class Revenue Allocation; C&I Demand Rate Design; Sales True-Up	11/8/2022
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	53719	Direct	TX	Depreciation Expense; HEB Backup Generators; Winter Storm URI; Class Cost-of-Service Study; Schedule IS; Schedule SMS	10/26/2022
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44280	Direct	GA	Alternate Rate Plan, Cost Recovery of Major Assets; Class Revenue Allocation; Other Tariff Terms and Conditions	10/20/2022

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UTILITY	ON BEHALF OF	DOCKET	TYPE	STATE / PROVINCE	SUBJECT	DATE
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	22-E-0317 / 22-G-0318 22-E-0319 / 22-G-0320	Rebuttal	NY	COVID-19 Impact; Distribution Cost Allocation; Class Revenue Allocation; Firm Transportation Rate Design	10/18/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Direct	NM	Standby Service Rate Design	10/17/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Direct	MN	Class Cost-of-Service Study; Class Revenue Allocation; Multi-Year Rate Plan; Interim Rates; TOU Rate Design	10/3/2022
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	22-E-0317 / 22-G-0318 22-E-0319 / 22-G-0320	Direct	NY	Electric and Gas Embedded Cost of Service Studies; Class Revenue Allocation; Rate Design	9/26/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00177-UT	Direct	NM	Renewable Portfolio Standard Incentive	9/26/2022
CENTERPOINT HOUSTON ELECTRIC LLC	Texas Industrial Energy Consumers	53442	Direct	TX	Mobile Generators	9/16/2022
ONCOR ELECTRIC DELIVERY COMPANY LLC	Texas Industrial Energy Consumers	53601	Cross-Rebuttal	TX	Class Cost-of-Service Study, Class Revenue Allocation; Distribution Energy Storage Resource	9/16/2022
ONCOR ELECTRIC DELIVERY COMPANY LLC	Texas Industrial Energy Consumers	53601	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design; Tariff Terms and Conditions	8/26/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	53034	Cross-Rebuttal	TX	Energy Loss Factors; Allocation of Eligible Fuel Expense; Allocation of Off-System Sales Margins	8/5/2022
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Direct	IA	Application of Advance Ratemaking Principles to Wind Prime	7/29/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	53034	Direct	TX	Allocation of Eligible Fuel Expense; Allocation of Winter Storm Uri	7/6/2022
AUSTIN ENERGY	Texas Industrial Energy Consumers	None	Cross-Rebuttal	TX	Allocation of Production Plant Costs; Energy Efficiency Fee Allocation	7/1/2022
AUSTIN ENERGY	Texas Industrial Energy Consumers	None	Direct	TX	Revenue Requirement; Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/22/2022
DTE ELECTRIC COMPANY	Gerdau MacSteel, Inc.	U-20836	Direct	MI	Interruptible Supply Rider No. 10	5/19/2022
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44160	Direct	GA	CARES Program; Capacity Expansion Plan; Cost Recovery of Retired Plant; Additional Sum	5/6/2022
EL PASO ELECTRIC COMPANY	Freeport-McMoRan, Inc.	52195	Cross-Rebuttal	TX	Rate 38; Class Cost-of-Service Study; Revenue Allocation	11/19/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Supplemental	NM	Responding to Seventh Bench Request Order (Amended testimony filed on 11/15)	11/12/2021
EL PASO ELECTRIC COMPANY	Freeport-McMoRan, Inc.	52195	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate 15 Design	10/22/2021

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UTILITY	ON BEHALF OF	DOCKET	TYPE	STATE / PROVINCE	SUBJECT	DATE
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Cross-Rebuttal	TX	Cost Allocation; Production Tax Credits; Radial Lines; Load Dispatching Expenses; Uncollectible Expense; Class Revenue Allocation; LGS-T Rate Design	9/14/2021
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	43838	Direct	GA	Vogtle Unit 3 Rate Increase	9/9/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	21-00172-UT	Direct	NM	RPS Financial Incentive	9/3/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; LGS-T Rate Design	8/13/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Direct	TX	Schedule 11 Expenses; Jurisdictional Cost Allocation; Abandoned Generation Assets	8/13/2021
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51997	Direct	TX	Storm Restoration Cost Allocation and Rate Design	8/6/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Surrebuttal	PA	Class Cost-of-Service Study; Revenue Allocation	8/5/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Rebuttal	PA	Class Cost-of-Service Study; Revenue Allocation; Universal Service Costs	7/22/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Supplemental	NM	Settlement Support of Class Cost-of-Service Study; Rate Desgin; Revenue Requirement.	7/1/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Direct	PA	Class Cost-of-Service Study; Revenue Allocation	6/28/2021
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20940	Rebuttal	MI	Allocation of Uncollectible Expense	6/23/2021
FLORIDA POWER & LIGHT COMPANY	Florida Industrial Power Users Group	20210015-EI	Direct	FL	Four-Year Rate Plan; Reserve Surplus; Solar Base Rate Adjustments; Class Cost-of-Service Study; Class Revenue Allocation; CILC/CDR Credits	6/21/2021
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	20-067-U	Surrebuttal	AR	Certificate of Environmental Compatibility and Public Need	6/17/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Rebuttal	NM	Rate Design	6/9/2021
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20940	Direct	MI	Class Cost-of-Service Study; Rate Design	6/3/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	51415	Supplemental Direct	TX	Retail Behind-The-Meter-Generation; Class Cost of Service Study; Class Revenue Allocation; LGS-T Rate Design; Time-of-Use Fuel Rate	5/17/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Direct	NM	Class Cost-of-Service Study; Class Revenue Allocation, LGS-T Rate Design, TOU Fuel Charge	5/17/2021
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	20-067-U	Direct	AR	Certificate of Environmental Compatibility and Public Need	5/6/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51625	Direct	TX	Fuel Factor Formula; Time Differentiated Costs; Time-of-Use Fuel Factor	4/5/2021

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SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	51415	Direct	TX	ATC Tracker, Behind-The-Meter Generation; Class Cost-of-Service Study; Class Revenue Allocation; Large Lighting and Power Rate Design; Synchronous Self-Generation Load Charge	3/31/2021
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51215	Direct	TX	Certificate of Convenience and Necessity for the Liberty County Solar Facility	3/5/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	50997	Cross Rebuttal	TX	Rate Case Expenses	1/28/2021
PPL ELECTRIC UTILITIES CORPORATION	PPL Industrial Customer Alliance	M-2020-3020824	Supplemental	PA	Energy Efficiency and Conservation Plan	1/27/2021
CENTRAL HUDSON GAS & ELECTRIC	Multiple Intervenors	20-E-0428 / 20-G-0429	Rebuttal	NY	Distribution cost classification; revised Electric Embedded Cost-of-Service Study; revised Distribution Mains Study	1/22/2020
MIDAMERICAN ENERGY COMPANY	Tech Customers	EPB-2020-0156	Reply	IA	Emissions Plan	1/21/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	50997	Direct	TX	Disallowance of Unreasonable Mine Development Costs; Amortization of Mine Closure Costs; Imputed Capacity	1/7/2021
CENTRAL HUDSON GAS & ELECTRIC	Multiple Intervenors	20-E-0428 / 20-G-0429	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Revenue Decoupling Mechanism	12/22/2020
NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	20-E-0380 / 20-G-0381	Rebuttal	NY	AMI Cost Allocation Framework	12/16/2020
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51381	Direct	TX	Generation Cost Recovery Rider	12/8/2020
NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	20-E-0380 / 20-G-0381	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Earnings Adjustment Mechanism; Advanced Metering Infrastructure Cost Allocation	11/25/2020
LUBBOCK POWER & LIGHT	Texas Industrial Energy Consumers	51100	Direct	TX	Test Year; Wholesale Transmission Cost of Service and Rate Design	11/6/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20889	Direct	MI	Scheduled Lives, Cost Allocation and Rate Design of Securitization Bonds	10/30/2020
CHEYENNE LIGHT, FUEL AND POWER COMPANY	HollyFrontier Cheyenne Refining LLC	20003-194-EM-20	Cross-Answer	WY	PCA Tariff	10/16/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00143	Direct	NM	RPS Incentives; Reassignment of non-jurisdictional PPAs	9/11/2020
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-578-ER-20	Cross	WY	Time-of-Use period definitions; ECAM Tracking of Large Customer Pilot Programs	9/11/2020
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-578-ER-20	Direct	WY	Class Cost-of-Service Study; Time-of-Use period definitions; Interruptible Service and Real-Time Day Ahead Pricing pilot programs	8/7/2020
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	50790	Direct	TX	Hardin Facility Acquisition	7/27/2020

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PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Surrebuttal	PA	Interruptible transportation tariff; Allocation of Distribution Mains; Universal Service and Energy Conservations; Gradualism	7/24/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Rebuttal	MI	Energy Weighting, Treatment of Interruptible Load; Allocation of Distribution Capacity Costs; Allocation of CVR Costs	7/14/2020
PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Rebuttal	PA	Distribution Main Allocation; Design Day Demand; Class Revenue Allocation; Balancing Provisions	7/13/2020
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2020-3019290	Rebuttal	PA	Network Integration Transmission Service Costs	7/9/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Direct	MI	Class Cost-of-Service Study;Financial Compensation Method; General Interruptible Service Credit	6/24/2020
PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Direct	PA	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/15/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Rebuttal	MI	Distribution Mains Classification and Allocation	5/5/2020
GEORGIA POWER COMPANY	Georgia Association of Manufacturers and Georgia Industrial Group	43011	Direct	GA	Fuel Cost Recovery Natural Gas Price Assumptions	5/1/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Direct	MI	Class Cost-of-Service Study; Transportation Rate Design; Gas Demand Response Pilot Program; Industry Association Dues	4/14/2020
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	90000-144-XI-19	Direct	WY	Coal Retirement Studies and IRP Scenarios	4/1/2020
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20642	Direct	MI	Class Cost-of-Service Study; Class Revenue Allocation; Infrastructure Recovery Mechanism; Industry Association Dues	3/24/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Cross	TX	Radial Transmission Lines; Allocation of Transmission Costs; SPP Administrative Fees; Load Dispatching Expenses; Uncollectible Expense	3/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00315-UT	Direct	NM	Time-Differentiated Fuel Factor	3/6/2020
SOUTHERN PIONEER ELECTRIC COMPANY	Western Kansas Industrial Electric Consumers	20-SPEE-169-RTS	Direct	KS	Class Revenue Allocation	3/2/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Direct	TX	Schedule 11 Expenses; Depreciation Expense (Rev. Req. Phase Testimony)	2/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Direct	TX	Class-Cost-of-Service Study; Class Revenue Allocation; Rate Design (Rate Design Phase Testimony)	2/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00134-UT	Direct	NM	Renewable Portfolio Standard Rider	2/5/2020

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SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Settlement	NM	Settlement Support of Rate Design, Cost Allocation and Revenue Requirement	1/20/2020
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	49737	Direct	TX	Certificate of Convenience and Necessity	1/14/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Rebuttal	NM	Class Cost-of-Service Study; Class Revenue Allocation	12/20/2019
ALABAMA POWER COMPANY	Alabama Industrial Energy Consumers	32953	Direct	AL	Certificate of Convenience and Necessity	12/4/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Direct	NM	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	11/22/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49616	Cross	TX	Contest proposed changes in the Fuel Factor Formula	10/17/2019
GEORGIA POWER COMPANY	Georgia Association of Manufacturers and Georgia Industrial Group	42516	Direct	GA	Return on Equity; Capital Structure; Coal Combustion Residuals Recovery; Class Revenue Allocation; Rate Design	10/17/2019
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	19-E-0378 / 19-G-0379 19-E-0380 / 19-G-0381	Rebuttal	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design	10/15/2019
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	19-E-0378 / 19-G-0379 19-E-0380 / 19-G-0381	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Amortization of Regulatory Liabilties; AMI Cost Allocation	9/20/2019
AEP TEXAS INC.	Texas Industrial Energy Consumers	49494	Cross-Rebuttal	TX	ERCOT 4CPs; Class Revenue Allocation; Customer Support Costs	8/13/2019
AEP TEXAS INC.	Texas Industrial Energy Consumers	49494	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design; Transmission Line Extensions	7/25/2019
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	49421	Cross-Rebuttal	TX	Class Cost-of-Service Study	6/19/2019
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	49421	Direct	TX	Class Cost-of-Service Study; Rate Design; Transmission Service Facilities Extensions	6/6/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	48973	Direct	TX	Prudence of Solar PPAs, Imputed Capacity, treatment of margins from Off-System Sales	5/21/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Rebuttal	MI	Classification of Distribution Mains; Allocation of Working Gas in Storage and Storage	4/29/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Direct	MI	Class Cost-of-Service Study; Transportation Rate Design	4/5/2019
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	49042	Cross-Rebuttal	TX	Transmsision Cost Recovery Factor	3/21/2019
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	49057	Direct	TX	Transmsision Cost Recovery Factor	3/18/2019
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2018-318-E	Direct	SC	Class Cost-of-Service Study, Class Revenue Allocation, LGS Rate Design, Depreciation Expense	3/4/2019

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ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Settlement	AR	Testimony in Support of Settlement	3/1/2019
ENERGY+ INC.	Toyota Motor Manufacturing Canada	EB-2018-0028	Updated Evidence	ON	Class Cost-of-Service Study, Distribution and Standby Distribution Rate Design	2/15/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Surrebuttal	AR	Solar Energy Purchase Option Tariff	2/14/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	48847	Direct	TX	Fuel Factor Formulas	1/11/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Direct	AR	Solar Energy Purchase Option Tariff	1/10/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20165	Direct	MI	Integrated Resources Plan; Projected Rate Impact, Risk Assessment; Early Retirement of Coal Units; Financial Compensation Mechanism	10/15/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20134	Rebuttal	MI	Class Cost-of-Service Study; Average Historical Profile; Distribution Cost Classification and Allocation; Rate Design	10/1/2018
ENERGY+ INC.	Toyota Motor Manufacturing Canada	EB-2018-0028	Initial Evidence	ON	Class Cost-of-Service Study, Distribution and Standby Distribution Rate Design	9/27/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20134	Direct	MI	Investment Recovery Mechanism, Litigation surcharge, Class Cost-of-Service Study, Class Revenue Allocation, Rate Design	9/10/2018
KANSAS GAS AND ELECTRIC COMPANY	Occidental Chemical Corporation	18-KG&E-303-CON	Rebuttal	KS	Benefits of the Interruptible Load Provided in the Special Contract	8/29/2018
TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	48401	Cross-Rebuttal	TX	4CP Moderation Adjustment	8/28/2018
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	48371	Cross-Rebuttal	TX	Class Cost-of-Service Study; Schedule FERC	8/16/2018
TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	48401	Direct	TX	Tax Cuts and Jobs Act; Rider TCRF; 4CP Moderation Adjustment	8/13/2018
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2018-3000164	Surrebuttal	PA	Post Test-Year Adjustment; Tax Cuts and Jobs Act; Class Cost-of-Service Study; Distribution System Improvement Charge	8/8/2018
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	48371	Direct	TX	Revenue Requirements; Tax Cuts and Jobs Act; Riders	8/1/2018
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	48371	Direct	TX	Class Cost-of-Service Study; Firm, Interruptible and Standby Rate Design	8/1/2018
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2018-3000164	Rebuttal	PA	Class Cost-of-Service Study; Class Revenue Allocation	7/24/2018
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	48233	Cross-Rebuttal	TX	Allocation of TCJA reduction	7/19/2018
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	48233	Direct	TX	Allocation of TCJA reduction	7/5/2018
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2018-3000164	Direct	PA	Post Test-Year Adjustment; Tax Cuts and Jobs Act; Class Cost-of-Service Study; Class Revenue Allocation	6/26/2018

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SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	47527	Cross-Rebuttal	TX	Class Cost-of-Service Study; Revenue Allocation	5/22/2018
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	17-00255-UT	Rebuttal	NM	Class Cost-of-Service Study; Revenue Allocation	5/2/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	17-041	Stipulation	AR	Support of Stipulation	4/27/2018
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	47527	Direct	TX	Present Base Revenues Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	4/25/2018
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	47527	Direct	TX	Tax Cuts and Jobs Act; SPP Transmission and Wheeling Costs; Depreciation Rate; LLPPAs; Imputed Capacity; Off-System Sales Margins	4/25/2018
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	17-00255-UT	Direct	NM	Class Cost-of-Service Study; Revenue Requirements; Revenue Allocation	4/13/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	17-041	Surrebuttal	AR	Certificate of Convenience and Necessity	4/6/2018
METROPOLITAN EDISON COMPANY; PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY	MEIUG, PICA and WPPII	2017-2637855 2017-2637857 2017-2637858 2017-2637866	Rebuttal	PA	Recovery of NITS Charges	3/22/2018
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	46936	2nd Supplemental Direct	TX	Support of Stipulation	3/2/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-18424	Direct	MI	Class Cost of Service	2/28/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	17-041	Direct	AR	Certificate of Convenience and Necessity	2/23/2018
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	47553	Direct	TX	Off-System Sales Margins; Renewable Energy Credits	2/20/2018
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	47461	2nd Supplemental Direct	TX	Certificate of Convenience and Necessity	2/7/2018
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	47461	Supplemental Direct	TX	Certificate of Convenience and Necessity	1/4/2018

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