

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:)	
Georgia Power Company's 2025)	Docket No. 56002
Integrated Resource Plan)	

In Re:)	
Georgia Power Company's Application)	Docket No. 56003
for Certification, Decertification, and)	
Amended Demand-Side Management)	
Plan)	

DIRECT TESTIMONY AND EXHIBIT OF

LISA V. PERRY

ON BEHALF OF

WALMART INC.

MAY 2, 2025

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Exhibit LVP-1

Witness Experience

1 **I. Introduction**

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

4 A. My name is Lisa V. Perry. My business address is 2608 SE J Street, Bentonville,
5 Arkansas 72716. I am employed by Walmart Inc. ("Walmart") as Director, Utility
6 Partnerships – Regulatory.

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

8 A. I am testifying on behalf of Walmart.

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

10 A. I received a J.D. in 1999 and a L.L.M. in Taxation in 2000 from the University of
11 Florida Levin College of Law. From 2001 to 2019, I was in private practice with an
12 emphasis from 2007 to 2019 in Energy Law. My practice included representing a
13 large commercial client before the utility regulatory commissions in Colorado,
14 Texas, New Mexico, Arkansas, and Louisiana in matters ranging from general rate
15 cases to renewable energy programs. I joined the energy department at Walmart in
16 September 2019 as Senior Manager, Energy Services. My Witness Qualifications
17 Statement is attached as Exhibit LVP-1.

18 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
19 **GEORGIA PUBLIC SERVICE COMMISSION ("COMMISSION")?**

20 A. Yes. I submitted testimony in Docket No. 55378.

21

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**
2 **STATE REGULATORY COMMISSIONS?**

3 A. Yes, I have submitted testimony with state regulatory commissions for Arkansas,
4 Colorado, Connecticut, Florida, Illinois, Indiana, Iowa, Kansas, Kentucky,
5 Louisiana, Maryland, Michigan, New Hampshire, New York, North Carolina, Ohio,
6 Oklahoma, Oregon, Pennsylvania, South Carolina, Texas, Virginia, Washington,
7 Wisconsin, and Wyoming. I have also provided legal representation for customer
8 stakeholders before the state regulatory commissions for Colorado, Texas,
9 Arkansas, Louisiana, and New Mexico in the cases listed under "Commission
10 Dockets" in Exhibit LVP-1.

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

12 A. Yes. I am sponsoring the exhibit listed in the Table of Contents.

13 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN**
14 **GEORGIA.**

15 A. As shown on Walmart's website, Walmart operates 209 retail units, 10 distribution
16 centers, three fulfillment centers, and employs over 65,000 associates in Georgia.¹
17 In fiscal year ending 2024, Walmart purchased approximately \$25.7 billion dollars
18 of goods and services from Georgia-based suppliers, supporting over 191,000
19 supplier jobs.²

¹ <https://corporate.walmart.com/about/location-facts/united-states/georgia>

² *Id.*

1 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN**
2 **THE SERVICE TERRITORY FOR GEORGIA POWER COMPANY**
3 **("COMPANY" OR "GPC")**

4 A. Walmart has 125 retail stores, three distribution centers, one fulfillment center, and
5 related facilities that take service from GPC.

6
7 **II. Purpose of Testimony and Summary of Recommendations**

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

9 A. The purpose of my testimony is to respond to the Company's proposed 2025
10 Integrated Resource Plan ("2025 IRP") filed January 31, 2025, along with
11 supporting testimony and documents, in which the Company is seeking, *inter alia*,
12 approval of new generation resources, power purchase agreements ("PPAs"), new
13 distributed energy resource ("DER") programs, and a new curtailable load, or
14 demand response ("DR"), program. Specifically, my testimony addresses
15 opportunities for customers to provide resources that can help the Company meet
16 its increasing customer demand.

17 **Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE**
18 **COMMISSION.**

19 A. Walmart recommends that the Commission require the Company to collaborate
20 with interested customers to continue the development of a robust portfolio of
21 programs that fosters broad participation and fully integrates advancing and
22 emerging technologies capable of delivering clean, reliable, and cost-effective
23 energy, including, a program similar to its proposed Customer-Sited Solar Plus

1 Storage Pilot Program for its larger commercial customers. Walmart also
2 recommends that the Commission require the Company to address affordability
3 concerns of its customers with the implementation of its Proposed Case in light of
4 cost information that the Company has provided in these consolidated Dockets.

5 **Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR**
6 **POSITION ADVOCATED BY THE COMPANY INDICATE WALMART'S**
7 **SUPPORT?**

8 A. No. The fact that an issue is not addressed herein should not be construed as an
9 endorsement of, agreement with, or consent to any filed position.

10
11 **III. Description of Proposed 2025 IRP**

12 **Q. CAN YOU PROVIDE A GENERAL DESCRIPTION OF THE PROPOSED**
13 **2025 IRP?**

14 A. Yes. Based on my understanding, the Company is submitting its statutorily required
15 triennial integrated resource plan to the Commission in which it outlines its strategy
16 for meeting customer electricity needs over a 20-year planning horizon, based on
17 projected load growth and a range of current and future resource options to serve
18 that demand.³ As part of this strategy, the Company evaluates both supply-side and
19 demand-side solutions.⁴

20 Further, it is my understanding that the Company's "Proposed Case" is double the
21 megawatt ("MW") savings, but will result in "significant upward pressure on

³³ See Direct Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle ("Grubb, *et al.* Direct"), p. 7, lines 11-17.

⁴ See *id.* at 7, lines 18-20.

1 rates."⁵ In its Direct Testimony, the Company provided the following cost
2 information: MG0 is \$630-\$746M/year and 111-MG0 is \$609-\$733 million per
3 year, as compared to GPC's current annual DSM budget of \$90 million and its
4 proposed budget for its Proposed Case is \$570-580 million per year. Walmart
5 understands that the Company conducted no bill impact analysis for Scenario MG0
6 because that is a rate case issue; the Company does not look at revenues in an IRP.⁶
7 Despite the fact that this is not a rate case, GPC witness Grubb (Panel 1) admitted
8 at the Hearing on March 26, 2025, that Scenario 1 – 111 MG0 is the Company's
9 "base case,"⁷ is not the least cost, and will cost its customers "billions."

10 **Q. WHAT SUPPLY-SIDE SOLUTIONS ARE THE COMPANY PROPOSING?**

11 A. The Company's existing generation fleet includes a mix of generation resources
12 including natural gas, nuclear, coal, and renewable power.⁸ As I understand it, the
13 Company plans to expand its supply-side resources by extending the operational
14 life of six existing generating units, enhancing its natural gas and nuclear facilities,
15 investing in hydroelectric assets, modifying its renewable energy procurement
16 process, and providing new customer subscription options.⁹ To further support the
17 expansion of renewables, the Company plans to integrate solar- or grid-charged
18 dispatchable storage with distributed generation ("DG") solar facilities, which will
19 increase capacity value and enable the storage of excess solar generation.¹⁰ To

⁵ See Direct Testimony of Dr. Ross Beppler, Carley Goff, A. Wilson Mallard, and Andy Phillips ("Beppler, *et al.* Direct"), p. 13, lines 6-14 and p. 14, line 16.

⁶ See GPC's Responses to STF-BAI-1 Set #1.

⁷ See Grubb, *et al.* Direct, p. 25, lines 6-8.

⁸ See 2025 IRP, p. 9, Figure 1C: Georgia Power's 2024 Energy Mix.

⁹ See 2025 IRP, p. 59.

¹⁰ See 2025 IRP, p. 81.

1 accomplish this integration, the Company proposes to procure flexible DG
2 resources with the option to co-locate battery energy storage systems ("BESS") at
3 the distribution level.¹¹

4 **Q. IS THE COMPANY PROPOSING ANY DEMAND SIDE MANAGEMENT**
5 **("DSM") SOLUTIONS?**

6 A. Yes. Currently, the Company offers different types of energy efficiency ("EE") and
7 DR programs along with what the Company refers to as "other DSM activities."¹²
8 Although the Company modeled different DSM Cases, it appears that the Company
9 is supporting and seeking approval of the "Proposed Case," which would close
10 some program offerings, modify other existing offerings, and propose a new
11 residential program offering.¹³

12 **Q. WHAT IS WALMART'S RESPONSE TO THE COMPANY'S PROPOSED**
13 **SUPPLY-SIDE AND DEMAND-SIDE SOLUTIONS SET FORTH IN THE**
14 **2025 IRP?**

15 A. Walmart recognizes the critical importance of ensuring reliable and resilient power
16 for all customers and supports the need to carefully balance supply and demand,
17 particularly in light of the Company's projected load growth. As I will detail later
18 in my testimony, Walmart believes that customers have an essential role to play on
19 both the supply and demand sides by contributing to grid reliability and resilience,
20 accelerating the integration of clean energy resources, and delivering economic
21 value system-wide. My testimony will specifically highlight opportunities related

¹¹ See *id.*

¹² See Beppler, *et al. Direct*, p. 9, lines 5-6.

¹³ See *id.* at 9; see *id.* at 13-14 (describing other modeled cases including the DSM Working Group ("DSMWG") Advocacy Case, Supply-Side Case, and Capacity and Affordability Case).

1 to resiliency programs that incorporate solar generation paired with storage, as
2 envisioned in the Company's proposed pilot for residential and small commercial
3 customers, as well as community-based initiatives capable of delivering affordable
4 clean energy solutions.

5
6 **IV. Walmart's Sustainability Goals**

7 **Q. HAS WALMART ESTABLISHED CORPORATE SUSTAINABILITY**
8 **GOALS THAT INCLUDE CLEAN ENERGY AND CARBON REDUCTION**
9 **GOALS?**

10 A. Yes, it has. Walmart has long had aggressive and significant company-wide
11 renewable energy goals, and on September 21, 2020, Walmart announced new
12 targets as a part of its sustainability goals, including: (1) to be supplied 100 percent
13 by renewable energy by 2035 and (2) zero carbon emissions in its operations,
14 including its transportation fleet vehicles, without the use of offsets, by 2040.
15 Walmart has also set a goal to transition to zero emission buildings by deploying
16 low-impact refrigerants for cooling and electric equipment for heating by 2040.¹⁴
17 Additionally, on January 9, 2024, Walmart announced a goal to bring 10 gigawatts
18 ("GW") of 13 new clean energy projects online by the end of 2030, including 1 GW
19 of new onsite solar plus storage, and enabling 2 GW of new community solar
20 projects.¹⁵

¹⁴ <https://corporate.walmart.com/news/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>.

¹⁵ [Walmart Keynote at CES 2024 \(Jan. 9, 2024\) https://tech.walmart.com/content/dam/walmart-global-tech/documents/Walmart%20CES%20Keynote%20Script%20Transcript_1.9.24.pdf](https://tech.walmart.com/content/dam/walmart-global-tech/documents/Walmart%20CES%20Keynote%20Script%20Transcript_1.9.24.pdf).

1 To date, Walmart has contracted for or currently takes electricity from one
2 or more renewable resources in at least 29 states, including Georgia, and Puerto
3 Rico. As a result, Walmart is one of GPC's customers who has significant interest
4 in renewables.¹⁶

5 **Q. WHAT CHANNELS DOES WALMART UTILIZE TO SECURE CLEAN**
6 **ENERGY RESOURCES?**

7 A. To meet its clean energy goals, Walmart utilizes three primary channels to secure
8 resources:

- 9 • **Development of off-site resources:** These products are typically structured
10 to replace other energy, both physically and on the bill. This mechanism
11 allows Walmart to leverage its scale to drive the best project economics
12 while simultaneously minimizing transaction time and costs. To date,
13 Walmart has contracted for these resources in deregulated markets through
14 Texas Retail Energy, LLC, a competitive electric supplier wholly owned by
15 Walmart that serves as its electric supplier in most deregulated retail
16 markets, to directly serve its load.

17 Walmart has also entered into "Virtual PPAs" and "Renewable
18 Energy Certificate ("REC") Agreements" in deregulated wholesale markets
19 for clean energy assets. These contracts do not directly serve Walmart's
20 load, but do allow Walmart to bring new large-scale renewable resources to
21 the market by entering into long-term financial agreements for clean energy
22 power and environmental attributes.

¹⁶ See 2025 IRP, p. 95.

- 1 • **Development of on-site resources:** Walmart is currently developing and
2 will own on-site, behind the meter resources, and has also contracted
3 resources through PPAs and leases that allow performance guarantees.
4 These resources replace grid energy with the expectation that the operating
5 costs for the site are reduced. Walmart is also investing in community solar
6 opportunities, which I will discuss later in my Testimony.
- 7 • **Utility partnerships:** Walmart works with its utility partners such as
8 Southern Company to develop useable commercial and industrial ("C&I")
9 programs and economic structures targeted to function within the confines
10 of the regulatory compact and with minimal impact to non-participating
11 customers. When this option is pursued, Walmart works to ensure that
12 programs it assists in developing can be used by broader groups of
13 customers, not merely by Walmart. Walmart is unique in the large
14 commercial space because it has significant in-house rate and regulatory
15 expertise that it is willing to leverage to create opportunities to move the
16 entire industry forward. Walmart currently participates in programs with 20
17 utilities across the United States. The largest of these partnerships that have
18 been executed to date include the development of and participation in
19 Florida Power & Light Company's SolarTogether® Program,¹⁷ Duke
20 Energy Florida LLC's Clean Energy Connection Program,¹⁸ **and the**

¹⁷ <https://newsroom.fpl.com/FPL-receives-approval-to-launch-the-largest-community-solar-program-in-the-U-S>.

¹⁸ See *In re: Petition for a limited proceeding to approve clean energy connection program and tariff and stipulation, by Duke Energy Florida, LLC*, Docket No. 20200176-EI, Order No. PSC-2021-0059-S-EI (issued Jan. 26, 2021), p. 5 (approving supporting tariff included as Attachment A). DEF's CEC tariff has been in place in Florida since 2021, although this matter was appealed; the Florida Supreme Court has not issued an opinion in SC 2021-303.

1 *Company's Renewable Energy Development Initiative Program*.¹⁹ While
2 Walmart assisted in developing these opportunities, the opportunities are
3 open to other interested, eligible customers, not just to Walmart.
4

5 **V. Customer Subscription Offerings**

6 **Q. YOU MENTIONED THAT THE COMPANY IS SEEKING APPROVAL**
7 **FOR SUPPLY SIDE SOLUTIONS, SUCH AS EXTENDING THE LIFE OF**
8 **CERTAIN GENERATION ASSETS AND PROPOSING MODIFIED OR**
9 **EXPANDED CUSTOMER SUBSCRIPTION OFFERINGS. CAN YOU**
10 **PLEASE DESCRIBE THESE CUSTOMER OFFERINGS?**

11 A. Yes. My understanding is that the Company is proposing to modify and expand its
12 existing CARES program as follows:

13 (1) **DG Subscription Program.** The Company proposes expanding its Care
14 and Renewable Energy Subscription ("CARES") program to allow eligible
15 residential and smaller C&I customers to subscribe to output from DG
16 resources procured through the DG request for proposal ("RFP") process.²⁰

17 (2) **DG Community Solar Program.** As part of the DG Subscription Program,
18 the Company proposes setting aside up to 10 MW from each DG RFP for
19 residential customer subscriptions using a simplified CARES model.²¹

¹⁹ <https://www.greenbiz.com/article/how-google-and-walmart-work-utilities-procure-clean-power>. Walmart also partnered with Alabama Power Company with respect to its 72 MW solar farm, <http://www.alabamane.wscenter.com/2018/01/02/chambers-county-solar-project-now-serving-alabama-power-customers/>, and with Entergy Louisiana for its Geaux Green Program, <https://www.energynewsroom.com/news/entergy-louisiana-receives-approval-purchase-475-mw-solar-power-add-green-tariff-option/>.

²⁰ See 2025 IRP, p. 93.

²¹ See *id.* at 98-99.

1 (3) **Utility Scale Subscription Program Enhancements.** To address
2 challenges from past RFPs, the Company proposes enhancing the CARES
3 program by offering longer subscription terms, revising pricing
4 methodologies to better protect non-participating customers, and adding
5 flexibility in procurement.²²

6 **Q. IN ADDITION TO ITS CARES PROGRAM, IS THE COMPANY**
7 **PROPOSING ANY OTHER PROGRAMS WITH CUSTOMER-SITED**
8 **SOLUTIONS?**

9 A. Yes, it is my understanding that the Company is also seeking approval for a new
10 customer-sited solar plus storage pilot program designed for residential and small
11 commercial customers that the Company claims will encourage the integration of
12 dispatchable BESS with Behind-the-Meter ("BTM") solar installations.²³
13 Additionally, the Company is proposing a new resiliency program for large C&I
14 customers, the Large Customer Owned Resiliency ("LCOR") Program, that allows
15 customers to retain ownership of their DER while providing the utility with demand
16 response.²⁴ Participating customers receive economic value for firm load
17 reductions, while non-participating customers benefit from shared savings, as
18 capacity is procured at a lower cost than traditional alternatives.²⁵

²² See *id.* at 96-97.

²³ See *id.* at 93.

²⁴ See 2025 IRP, p. 107.

²⁵ See *id.*

1 **Q. DOES WALMART SUPPORT THE COMPANY'S PROPOSED**
2 **MODIFICATION AND EXPANSION OF ITS CARES PROGRAM AND**
3 **LCOR PROGRAMS?**

4 A. Yes, it does. Walmart supports the Company's continued efforts to expand and
5 enhance these programs and will further evaluate potential participation should
6 either program be approved as part of the 2025 IRP.

7 **Q. IN ADDITION TO CUSTOMER-SITED SOLAR PLUS STORAGE AND**
8 **BACK-UP GENERATION, ARE THERE OTHER SUPPLY RESOURCES**
9 **THAT WALMART SUPPORTS?**

10 A. Yes, there are. In addition to actively participating in backup generation programs
11 in multiple states – similar to the Company's proposed LCOR Program – and
12 investing in on-site solar plus BESS at its facilities, Walmart also subscribes to off-
13 site community solar programs in jurisdictions where such offerings are available.
14 Through these programs, Walmart sites will subscribe to an allocation of a shared
15 offsite solar installation and receive bill credits based on their subscription size,
16 facility power usage, and their eligible utility expenses. In addition to community
17 solar program participation, Walmart is also working to make clean energy
18 accessible and affordable for its customers and members, as part of its commitment
19 to unlock 2 GW of new community solar projects around the United States. As an
20 example, Walmart recently announced its investment in seven community solar
21 projects in Illinois and New York, which will serve low-to-moderate income
22 households, public schools, and religious institutions, among others.

1 **Q. IS WALMART INTERESTED IN CONTINUING TO WORK WITH THE**
2 **COMPANY ON DEVELOPING ADDITIONAL SUPPLY-SIDE**
3 **PROGRAMS FOR CUSTOMERS SUCH AS COMMUNITY SOLAR?**

4 A. Yes, it is. As part of its sustainability goals and its commitment to supporting
5 cleaner, more affordable power for all customers – including Walmart's customers
6 and associates – Walmart actively collaborates with utility partners such as GPC to
7 develop and advance community solar solutions. These efforts include:
8 (i) participating in programs that deliver clean power to Walmart facilities as an
9 off-taker; (ii) serving as a site host for community solar projects that benefit other
10 customers; and/or (iii) investing in a range of community solar developments, from
11 utility-scale installations to smaller, localized projects. Walmart values its ongoing
12 partnership with the Company and looks forward to further exploring these and
13 other customer-sited supply opportunities.

14 **Q. YOU MENTIONED THAT THE COMPANY IS SEEKING APPROVAL IN**
15 **THIS DOCKET FOR SPECIFIC DEMAND SIDE RESOURCES, SUCH EE,**
16 **DR, AND CUSTOMER RESILIENCY PROGRAMS. DOES WALMART**
17 **SUPPORT THESE TYPES OF PROGRAMS?**

18 A. Yes, it does. While demand-side solutions often consist of a diverse array of
19 programs tailored to different customer classes, Walmart recognizes the critical
20 importance of offering a comprehensive and flexible suite of options to encourage
21 broad customer participation. Maximizing engagement across the customer base is
22 essential to effectively reducing overall demand and enhancing grid efficiency.
23 Equally important is the opportunity for these programs to leverage customer-sited

1 resources in ways that strengthen grid reliability and resiliency for the benefit of all
2 users. For instance, the Company's proposed LCOR Program for transmission-
3 connected C&I customers,²⁶ as well as the Customer-Sited Solar Plus Storage Pilot
4 Program,²⁷ represent innovative approaches to integrating customer resources into
5 the broader system. While Walmart may not be eligible to participate in these
6 specific offerings, it remains committed to evaluating participation in both existing
7 and proposed programs and looks forward to continued collaboration with the
8 Company to shape and expand demand-side initiatives that offer meaningful and
9 scalable solutions for customers.

11 **VI. Walmart's Recommendation to the Commission**

12 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION** 13 **WITH REGARD TO THE COMPANY'S PROPOSALS INCLUDED IN ITS** 14 **2025 IRP?**

15 A. Walmart understands that the Company's proposed 2025 IRP serves not only as a
16 long-term planning tool but also as a mechanism for seeking Commission approval
17 of specific actions, including changes to existing generation resources,
18 modifications to customer-based programs, and the introduction of new customer
19 offerings. Over the past several years, Walmart has actively collaborated with the
20 Company to shape customer-focused programs and explore innovative
21 opportunities for leveraging large commercial customers such as Walmart. These
22 efforts include the deployment of DG – ranging from traditional technologies such

²⁶ See Bepler, *et al.* Direct, p. 48 (discussing the LCOR program).

²⁷ See *id.* at 39 (discussing the Customer-Sited Solar Plus Storage Pilot).

1 as rooftop solar and backup generators to newer approaches like community solar
2 and battery storage – as well as participation in demand-side programs such as EE
3 and DR. Walmart recommends that the Commission require the Company to
4 collaborate with interested customers to continue the development of a robust
5 portfolio of programs that fosters broad participation and fully integrates advancing
6 and emerging technologies capable of delivering clean, reliable, and cost-effective
7 energy, including, a program similar to its proposed Customer-Sited Solar Plus
8 Storage Pilot Program for its larger commercial customers. Walmart also
9 recommends that the Commission require the Company to address affordability
10 concerns of its customers with the implementation of its Proposed Case in light of
11 cost information that the Company has provided in these consolidated Dockets.

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

13 A. Yes.

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:)	
Georgia Power Company's 2025)	Docket No. 56002
Integrated Resource Plan)	

In Re:)	
Georgia Power Company's Application)	Docket No. 56003
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**EXHIBIT LVP-1 OF
LISA V. PERRY
ON BEHALF OF
WALMART INC.**

Lisa V. Perry

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EXPERIENCE

September 2023 – Present

Walmart Inc., Bentonville, AR

Director, Utility Partnerships - Regulatory

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Senior Manager, Energy Services

November 2017 – September 2019

Oram & Houghton PLLC, Round Rock, TX

Of Counsel, Energy Law

February 2016 – November 2017

Ray Quinney & Nebeker, P.C., Salt Lake City, UT

Of Counsel, Energy Law

September 2007 – February 2016

Welborn, Sullivan, Meck & Tooley, P.C., Denver, CO

Partner, Energy Law

EDUCATION

2000 University of Florida Levin College of Law LL.M., Taxation

1999 University of Florida Levin College of Law J.D.

1996 University of South Florida B.A., Criminology

1993 University of South Florida B.A., Psychology

FILED TESTIMONY

2025

Public Utilities Commission of Ohio Case Nos. 24-0468-EL-AIR, 24-0469-EL-ATA, 24-0470-EL-AAM, and 24-0471-EL-UNC: In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company and the Toledo Edison Company for an Increase in Electric Distribution Rates, Tariff Approval, Approval to Change Accounting Methods, and for Approval of Miscellaneous Customer Programs.

Issue: General rate case.

Commonwealth of Kentucky Public Service Commission Case No. 2024-00354: In the Matter of Electronic Application of Duke Energy Kentucky, Inc. for: 1) an Adjustment of the Electric Rates; 2) Approval of New Tariffs; 3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and 4) All Other Required Approvals and Relief.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2024-00184: Application of Virginia Electric and Power Company in re: Virginia Electric and Power Company's 2024 Integrated Resource Plan filing pursuant to Va. Code § 56-597 et. seq.

Issue: 2024 Integrated Resource Plan.

New Hampshire Public Utilities Commission Docket No. DE 24-070: Public Service Company of New Hampshire d/b/a Eversource Energy Petition for Temporary and Permanent Rates.

Issue: General Rate Case.

2024

Indiana Utility Regulatory Commission Cause No. 46120: Petition of Northern Indiana Public Service Company LLC Pursuant to Ind. Code §§ 8-1-2-42.7, 8-1-2-61 and 8-1-2.5-6 for (1) Authority to Modify its Retail 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 (Both Existing and New); (3) Approval of Revised Common and Electric Depreciation Rates Applicable to its Electric Plant in Service; (4) Approval of Necessary and Appropriate Accounting Relief, Including, but Limited to, Authority to Capitalize as Rate Base all Expenditures for Improvements to Petitioner's Information Technology Systems Through the Design, Development, and Implementation of a Work and Asset Management ("WAM") Program, to the Extent Necessary; and (5) Approval of Alternative Regulatory Plans for the Partial Waiver of 170 IAC 4-1-16(f) and Proposed Remote Disconnection and Reconnection Process and, to the Extent Necessary, Implementation of a Low Income Program.

Issue: General Rate Case.

State of New York Public Service Commission Case 24-E-0461: Proceedings on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas & Electric Corporation for Electric Service and Case 24-G-0462: Proceedings on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas & Electric Corporation for Gas Service.

Issue: General rate case for electric and gas.

Walmart Inc.
Exhibit LVP-1

Georgia Public Service Commission Docket Nos. 56002 and 56003

Michigan Public Service Commission Case No. U-21585: In the matter of the application of CONSUMERS ENERGY 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.

Issue: General rate case.

State of New York Public Service Commission Case 24-E-0322: Proceedings on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Electric Service and Case 24-G-0323: Proceedings on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Gas Service.

Issue: General rate case for electric and gas.

Public Utilities Commission of Ohio Case No. 24-508-EL-ATA: In the Matter of the Application of Ohio Power Company for New Tariffs Related to Data Centers and Mobile Data Centers.

Issue: Approval of two tariffs designed specifically for lager data centers and mobile data centers.

Public Service Commission of Wisconsin Docket No. 6690-UR-128: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Issue: General rate case for electric and gas.

Public Utility Commission of Texas Docket No. 56216, SOAH Docket No. 473-24-21528: Application of Entergy Texas, Inc. for Approval of Rate Schedule UODG.

Issue: Seeing approval of a voluntary microgrid program.

Michigan Public Service Commission Case No. U-21534: 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.

Issue: General rate case.

Public Utility Commission of Oregon Docket No. UE 435: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

Issue: General Rate Case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2024-00024: Application of Appalachian Power Company for a 2024 biennial review of its base rates, terms and conditions pursuant to § 56-585.8 of the Code of Virginia.

Issue: Biennial review of rates.

Walmart Inc.
Exhibit LVP-1

Georgia Public Service Commission Docket Nos. 56002 and 56003

Indiana Utility Regulatory Commission Cause No. 46038: 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 Multi-Step Rate Implementation 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 Revised Electric Depreciation Rates Applicable to its Electric Plant in Service, and Approval of Regulatory Asset Treatment Upon Retirement of the Company's Last Coal-fired Steam Generation Plant; (4) Approval of an Adjustment to the Company's FAC Rider to Track Coal Inventory Balances; and (5) Approval of Necessary and Appropriate Accounting Relief, Including Authority to: (A) Defer to a Regulatory Asset Expenses Associated with the Edwardsport Carbon Capture and Sequestration Study, (B) Defer to a Regulatory Asset Costs Incurred to Achieve Organizational Savings, and (C) Defer to a Regulatory Asset or Liability, as Applicable, all Calculated Income Tax Differences Resulting from Future Changes in Income Tax Rates.

Issue: General Rate Case.

Washington Utilities and Transportation Commission Docket Nos. UE-240006/UG-240007 (consolidated): Washington Utilities and Transportation Commission, Complainant v. Avista Corporation d/b/a Avista Utilities, Respondent.

Issue: General rate case for electric and gas service.

Public Service Commission of South Carolina Docket Nos. 2023-8-E and 2023-10-E: In re: Duke Energy Progress, LLC's 2023 Integrated Resource Plan (IRP) and In re: Duke Energy Carolinas, LLC's 2023 Integrated Resource Plan (IRP).

Issue: General Rate Case.

Public Utility Commission of Texas Docket No. 56211, SOAH Docket No. 473-24-13232: Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates.

Issue: General Rate Case.

Pennsylvania Public Utility Commission Docket No. R-2024-3047068: Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric Company

Issue: General Rate Case.

Pennsylvania Public Utility Commission Docket No. R-2024-3046931: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division

Issue: General Rate Case.

Pennsylvania Public Utility Commission Docket No. R-2024-3046932: Pennsylvania Public Utility Commission v. PECO Energy Company – Gas Division

Issue: General Rate Case.

Pennsylvania Public Utility Commission Docket No. R-2024-3046523: Pennsylvania Public Utility Commission v. Duquesne Light Company

Issue: General Rate Case.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Public Service Commission of South Carolina Docket No. 2024-34-E: In re: Application of Dominion Energy South Carolina, Inc. for Authority to Adjust and Increase Its Retail Electric Rate Schedules, Tariffs, and Terms and Conditions
Issue: General Rate Case.

North Carolina Utilities Commission Docket No. E-100, Sub 190: In the Matter of Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress LLC, Pursuant to N.C.G.S. § 62-110.1(c).
Issue: Carbon Plan and Integrated Resource Plan.

Public Utility Commission of Texas Docket No. 56165, SOAH Docket No. 473-24-12812: Application of AEP Texas Inc. for Authority to Change Rates.
Issue: General Rate Case.

Illinois Commerce Commission Docket Nos. 22-0487 and 23-0082 (cons.) (reopen.): Illinois Commerce Commission on its Own Motion vs. Ameren Illinois Company d/b/a Ameren Illinois and Order Requiring Ameren Illinois Company to file an Initial Multi-Year Integrated Grid Plan and Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the Public Utilities Act and Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18.
Issue: Refiled Multi-Year Integrated Grid Plan.

Public Service Commission of South Carolina Docket No. 2022-326-E: In re: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Customer Renewable Programs
Issue: Seeking approval of new voluntary renewable programs.

Iowa Utilities Board Docket No. RPU-2023-0002: In re: Interstate Power and Light Company
Issue: General rate case.

Public Service Commission of South Carolina Docket No. 2023-388-E: In re: Application of Duke Energy Carolinas, LLC for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order
Issue: General rate case.

Florida Public Service Commission Docket No. 20230020-EI: In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Elsa, Eta, Isaias, Ian, Nicole, and Tropical Storm Fred, by Duke Energy Florida, LLC.
Issue: Seeking approval of cost recovery for storm costs resulting from the named Hurricanes and Tropical Storm.

Public Utility Commission of Texas Docket No. 55176, SOAH Docket No. 473-24-06013: Application of El Paso Electric Company to Implement a Voluntary Texas Business Solar Power Program.
Issue: Approval of a voluntary renewable energy program.

Florida Public Service Commission Docket No. 20230019-EI: In re: Petition for recovery of costs associated with named tropical systems during the 2019-2022 hurricane seasons and replenishment of storm reserve, by Tampa Electric Company.

Issue: Seeking approval of cost recovery for storm costs incurred during the 2019-2022 hurricane seasons.

Georgia Public Service Commission Docket No. 55378: In Re: Georgia Power Company's 2023 Integrated Resource Plan Update, Certification of the Power Purchase Agreement Between Georgia Power Company and Mississippi Power Company and Santa Rosa Energy Center LLC, and Amended Certification of the Residential Thermostat Demand Response Demand Side Management Program.

Issue: Approval of an updated Integrated Resource Plan.

Public Service Commission of South Carolina Docket No. 2023-369-E: In re: S.C. Code Ann. Section 58-37-60 Independent Study to Evaluate the Integration of Renewable Energy and Emerging Energy Technologies into the Electric Grid for the Public Interest.

Issue: Evaluation of integrating renewable generation and related technologies into the grid.

2023

Public Service Commission for the State of Maryland Case No. 9702: In the Matter of the Application of Potomac Electric Power Company for Adjustments to its Retail Rates for the Distribution of Electric Energy

Issue: General rate case.

Public Service Commission for the State of New York Case No. 23-E-0418: Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas & Electric Corporation for Electric Service; and Case No. 23-G-0419: Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas and Electric Corporation for Gas Service.

Issue: General rate cast for electric and gas service.

Indiana Utility Regulatory Commission Cause No. 45933: 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, Including Cost of Removal Less Salvage, and Updated Depreciation Expense; (2) Accounting Relief, Including Deferrals and Amortizations; (3) Inclusion of Capital Investment; (4) Rate Adjustment Mechanism Proposals, Including New Grant Projects Rider and Modified Tax Rider; (5) a Voluntary Residential Customer Powerpay Program; (6) Waiver of Declination of Jurisdiction with Respect to Certain Rules to Facilitate Implementation of the Powerpay Program; (7) Cost Recovery for Cook Plant Subsequent License Renewal Evaluation Project; and (8) New Schedules of Rates, Rules and Regulations.

Issue: General rate case.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Public Utilities Commission of Ohio Case No. 23-301-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 Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

Issue: Approval of the Company's proposed Electric Security Plan.

Louisiana Public Service Commission Docket No. U-36697: Application of Entergy Louisiana, LLC for Approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.

Issue: Approval of a voluntary renewable program backed by utility-owned solar assets.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-00101: Application of Virginia Electric and Power Company for a 2023 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.

Issue: Biennial review of rates.

Commonwealth of Kentucky Public Service Commission Case No. 2023-00159: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) a Securitization Financing Order; and (5) all other Required Approvals and Relief.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-36625: Application of Entergy Louisiana, LLC for Approval of the Entergy Future Ready Resilience Plan (Phase I)

Issue: Recovery of costs to upgrade transmission and distribution systems.

Colorado Public Utilities Commission Proceeding No. 23A-0242E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2024-2026 Transportation Electrification Plan.

Issue: Seeking approval of utility's second transportation electrification plan.

Indiana Utility Regulatory Commission Cause No. 45919: In the Matter of the Petition of Indiana Michigan Power Company for Approval of (1) an Electric Vehicle Fast Charging Rate and Tariff and (2) Deferred Accounting Treatment for the Costs of Certain Company-Owned Electric Vehicle Fast Charging Stations and the Revenue from the Electric Vehicle Fast Charging Tariff.

Issue: Approval of an EV charging tariff for utility-owned public EV chargers.

Oklahoma Corporation Commission Cause No. PUD 2023000038: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Preapproval of New Generation Capacity Pursuant to 17 O.S. Section 286(C).

Issue: Approval to construct two CT units and recovery of costs through a rider.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

State Corporation Commission of the State of Kansas Docket No. 23-EKCE-775-RTS: In the Matter of the Joint Application of Evergy Kansas Central, In., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Approval to Make Certain Changes in their Charges for Electric Service.
Issue: General rate case.

Michigan Public Service Commission Case No. U-21389: 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.
Issue: General rate case.

Public Service Commission of Wyoming Docket No. 20000-633-ER-23 (Record No. 17252): In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$140.2 Million Per Year or 21.6 Percent and to Revise the Energy Cost Adjustment Mechanism.
Issue: General Rate Case.

Public Utility Commission of Texas Docket No. 54634, SOAH Docket No. 473-23-14020: Application of Southwestern Public Service Company for Authority to Change Rates.
Issue: General Rate Case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-00002: Application of Appalachian Power Company for a 2023 triennial review of its base rates, terms and conditions pursuant to § 56-585.1 of the Code of Virginia.
Issue: Triennial review of rates.

Michigan Public Service Commission Case No. U-21297: 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.
Issue: General rate case.

Indiana Utility Regulatory Commission Cause No. 45816: Investigation of the Indiana Utility Regulatory Commission Regarding the Public Utility Regulatory Policies Act Section 111(d) Standards as Amended by the Infrastructure Investment and Jobs Act.
Issue: Electric vehicle charging programs and tariffs.

Illinois Commerce Commission Docket No. 23-0055: Commonwealth Edison Company Petition for Approval of a Multi-Year Rate Plan under Section 16-108.18 of the Public Utilities Act.
Issue: Multi-Year Rate Plan rate case.

Illinois Commerce Commission Docket No. 23-0082: Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18.
Issue: Multi-Year Rate Plan rate case.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Illinois Commerce Commission Docket No. 23-0067: Ameren Illinois Company d/b/a Ameren Illinois Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service. (Tariff filed January 6, 2023).

Issue: Gas general rate case.

Illinois Commerce Commission Docket No. 23-0066: Northern Illinois Gas Company d/b/a Nicor Gas Company Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service. (Tariff filed January 3, 2023).

Issue: Gas general rate case.

Indiana Utility Regulatory Commission Cause No. 45843: Verified Petition of Indianapolis Power & Light Company d/b/a AES Indiana for Commission Approval of an Electric Vehicle Portfolio, Including: (1) A Public Use Electric Vehicle Pilot Program Pursuant to Ind. Code Ch. 8-1-43; and (2) Time-Varying and Other Alternative Pricing Structures and Tariffs Pursuant to Ind. Code §8-1-2.5-6(3); and for Approval of Associated Accounting and Ratemaking.

Issue: Electric vehicle charging programs and tariffs.

Arkansas Public Service Commission Docket No. 22-065-U: In the Matter of the Application of Southwestern Electric Power Company for a Certificate of Public Convenience and Necessity to Operate the John W. Turk, Jr. Power Plant to Supply a Public Service to its Arkansas Customers and for Approval of a Generation Cost Recovery Rider to Recover its Costs in Arkansas Rates.

Issue: Cost recovery from customers of an existing generation resource.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2022-00166: Petition of Appalachian Power Company for consideration of the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation.

Issue: Recovery methodology and cost allocation of VCEA-related costs.

Oklahoma Corporation Commission Cause No. PUD 202200093: 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 and to Approve a Formula Base Rate Proposal.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202200121: Application of Public Service Company of Oklahoma (PSO) for Approval of the Cost Recovery of the Selected Wind and Solar Facilities (Renewable Resources); a Determination there is a Need for the Renewable Resources; Approval for Cost Recovery of Prudent Costs Incurred by PSO for the Renewable Resources; Approval of a Temporary Cost Recovery Rider; Approval of Certain Treatment of Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO is Entitled.

Issue: Acquisition of renewable generation and recovery through a rider.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Arkansas Public Service Commission Docket No. 22-061-U: In the Matter of an Application into Potential Cost Shifting Associated with Net Metering.

Issue: Net metering tariff and any potential cost shifting between participating and non-participating customers.

2022

Commonwealth of Virginia State Corporation Commission Case No. PUR-2022-00124: Petition of Virginia Electric and Power Company for approval of its 2022 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests.

Issue: Approval of 2022 RPS Plan, new renewable projects, PPAs, and cost recovery mechanism, Rider CE, pursuant to the VCEA.

Public Service Commission of South Carolina Docket No. 2022-254-E: In re: Application of Duke Energy Progress, LLC for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order.

Issue: General rate case.

Public Utility Commission of Texas Docket No. 53719, SOAH Docket No. 473-22-04394: Application of Entergy Texas, Inc. for Authority to Change Rates.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-36350: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricane Ida and Related Relief

Issue: Recovery costs related to Hurricane Ida.

Illinois Commerce Commission Docket Nos. 22-0432 and 22-0442 (cons.): Commonwealth Edison Company Petition for Approval of Beneficial Electrification Plan under the Electric Vehicle Act, 20 ILCS 627/45 and New EV Charging Delivery Classes under the Public Utilities Act, Article IX and Illinois Commerce Commission on its own Motion vs. Commonwealth Edison Company Investigation into Commonwealth Edison Company's Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45

Issue: Approval of Beneficial Electrification Plan.

Illinois Commerce Commission Docket Nos. 22-0431 and 22-0443 (cons.): Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of Beneficial Electrification Plan pursuant to Section 45 of the Electric Vehicle Act and Illinois Commerce Commission on its own Motion vs. Ameren Illinois Company d/b/a Ameren Illinois Investigation into Ameren Illinois Company's Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45

Issue: Approval of Beneficial Electrification Plan.

Florida Public Service Commission Docket No. 20220010-EI: In re: Storm protection plan cost recovery clause

Issue: Seeking approval of the cost allocation and recovery methodologies used for storm protection plan cost recovery clause.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Michigan Public Service Commission Case No. U-21224: 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.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00156: *Ex Parte*: Establishing a proceeding concerning the allocation of RPS-related costs and the determination of certain proxy values for Virginia Electric and Power Company.

Issue: Allocation methodology for VCEA-related costs and benefits.

Michigan Public Service Commission Case No. U-20836: In the matter of the Application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202100164: 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.

Issue: General Rate Case.

Louisiana Public Service Commission Docket No. U-36190: Application of Entergy Louisiana, LLC for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief.

Issue: Approval of a voluntary renewable program backed by utility-owned solar assets.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00206: Petition of Appalachian Power Company For approval of its 2021 RPS Plan under § 56-585.5 of the Code of Virginia and related requests.

Issue: Seeking approval of RPS Plan and recovery mechanisms for related costs.

Commonwealth of Kentucky Public Service Commission Case No. 2021-00481: Electronic Joint Application of American Electric Power Company, Inc., Kentucky Power Company and Liberty Utilities Co. for Approval of the Transfer of Ownership and Control of Kentucky Power Company.

Issue: Acquisition of Kentucky Power Company by Liberty Utilities Company.

Arkansas Public Service Commission Docket No. 21-070-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Issue: General rate case.

Arkansas Public Service Commission Docket No. 21-087-U: In the Matter of Oklahoma Gas and Electric Company's Request to Extend its Formula Rate Plan Rider.

Issue: Seeking extension of formula rate plan.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Public Utility Commission of Texas Docket No. 52451, SOAH Docket No. 473-22-0816: Application of Southwestern Public Service Company for Approval of Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fee.
Issue: Approval to implement AMS and recover costs through an additional surcharge.

2021

Louisiana Public Service Commission Docket No. U-36105: Application for Certification to Deploy Natural Gas-Fired Distributed Generation and Authorization to Implement Rider UODG.
Issue: Approval to implement a distributed generation program and rider recovery.

Public Utility Commission of Texas Docket No. 52389, SOAH Docket No. 473-22-0009: Application of Southwestern Electric Power Company for Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees.
Issue: Approval to implement AMS and recover costs through an additional surcharge.

Louisiana Public Service Commission Docket No. U-35991: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricanes Laura, Delta, Zeta and Winter Storm Uri and for Related Relief.
Issue: Securitization of system restoration costs due to extreme weather conditions.

Oklahoma Corporation Commission Cause No. PUD 202100076: Application of Public Service Company of Oklahoma (“PSO”) for Approval of a Financing Order for the Collection of Increased Costs Caused by the Extreme Winter Weather and Contained in the Regulatory Asset Authorized by Order 717625, Including an Appropriate Carrying Cost, and Such Other Relief as the Commission Deems PSO is Entitled.
Issue: Securitization of excessive fuel costs due to extreme weather conditions.

Colorado Public Utilities Commission Proceeding No. 21A-0141E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021 Electric Resource Plan and Clean Energy Plan.
Issue: Seeking approval of utility’s plan to meet legislative renewable and carbon reduction goals.

Arkansas Public Service Commission Docket No. 21-054-TF: In the Matter of the Application of Entergy Arkansas, LLC for a Proposed Tariff Revision Regarding a Green Promise Tariff.
Issue: Seeking approval for a voluntary renewable energy tariff.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00058: Application of Virginia Electric and Power Company for a 2021 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.
Issue: General Rate Case.

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Georgia Public Service Commission Docket Nos. 56002 and 56003

Public Utility Commission of Texas Docket No. 52040, SOAH Docket No. 473-21-2607: Application of El Paso Electric Company for Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees.

Issue: Approval to implement AMS and recover costs through an additional surcharge.

Oklahoma Corporation Commission Cause No. PUD 202100072: In the Matter of the Application of Oklahoma Gas and Electric Company for a Financing Order Pursuant to the February 2021 Regulated Utility Consumer Protection Act Approving Securitization of Costs Arising from the Winter Weather Event of February 2021.

Issue: Securitization of excessive fuel costs due to extreme weather conditions.

Public Utility Commission of Texas Docket No. 51802, SOAH Docket No. 473-21-1892: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202100055: 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.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-35441: Application of Southwestern Power Company (SWEPCO) for Approval of a Change in Rates, Extension of Formula Rate Plan and Other Related Relief.

Issue: General rate case and extension of formula rate plan.

Michigan Public Service Commission Case No. U-20963: 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.

Issue: General rate case.

Florida Public Service Commission Docket No. 20210010-EI: In re: Storm protection plan cost recovery clause

Issue: Seeking approval of the cost allocation and recovery methodologies used for storm protection plan cost recovery clause.

Arkansas Public Service Commission 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.

Issue: Seeking approval for amortization period and carrying costs for extraordinary fuel costs related to Winter Storm Uri.

Public Utility Regulatory Authority of Connecticut Docket No. 17-12-03RE11: PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review.

Issue: Investigation into low-income rates and economic development rates.

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Public Utility Commission of Texas Docket No. 51415, SOAH Docket No. 473-21-0538: Application of Southwestern Electric Power Company for Authority to Change Rates.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00170: Petition of Virginia Electric and Power Company for approval of a rate adjustment clause, designated Rider RPS, under § 56-585.1 A 5 d of the Code of Virginia.

Issue: Seeking approval of a Rider RPS to recover costs associated with REC purchases made to comply with the Virginia Clean Economy Act.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00350: Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.

Issue: General rate case.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00349: Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00164: *Ex Parte*: Allocating RPS costs to certain customers of Virginia Electric and Power Company.

Issue: Determining which costs and benefits of Virginia Clean Economy Act-related assets should be allocated to non-utility customers and seeking approval of a Rider NBC to recover/credit some of those costs and/or benefits.

Oklahoma Corporation Commission Cause No. PUD 202000097: Application of Public Service Company of Oklahoma (“PSO”) for Approval of the Cost Recovery of Facilities to be Located at Ft. Sill; a Determination there is a Need for the Facilities; Approval for Future Inclusion in Base Rates for Cost Recovery of Prudent Costs Incurred by PSO for the Facilities; Approval of a Temporary Cost Recovery Rider; and Such Other Relief the Commission Deems PSO is Entitled.

Issue: Seeking approval to acquire a solar facility and gas facility sited at Fort Sill.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00134: *Ex Parte*: Establishing 2020 RPS Proceeding for Virginia Electric and Power Company.

Issue: Seeking approval of a Renewable Portfolio Standard Plan and rider pursuant to the Virginia Clean Economy Act (VCEA).

2020

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00135: *Ex Parte*: Establishing 2020 RPS Proceeding for Appalachian Power Company.

Issue: Seeking approval of a Renewable Portfolio Standard Plan pursuant to the Virginia Clean Economy Act (VCEA).

Public Service Commission of South Carolina Docket No. 2019-209-E: In re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Dominion Energy South Carolina, Incorporated and S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission.

Issue: Seeking approval of a Voluntary Renewable Energy Rider.

Public Service Commission of South Carolina Docket No. 2020-125-E: In re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges.

Issue: General rate case.

Arkansas Public Service Commission Docket No. 16-036-FR: In the Matter of Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U.

Issue: Seeking five-year extension of Formula Rate Plan.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00174: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and (5) All Other Required Approvals and Relief.

Issue: General rate case.

Colorado Public Utilities Commission Proceeding No. 20A-0204E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021-2023 Transportation Electrification Plan.

Issue: Seeking approval of utility's plan to encourage EV adoption in its service territory.

Oklahoma Corporation Commission Cause No. PUD 202000021: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Approving a Recovery Mechanism for Expenditures Related to the Oklahoma Grid Enhancement Plan.

Issue: Seeking approval of a rider that allows for interim recovery of costs associated with expenditures made to enhance the grid.

Arkansas Public Service Commission Docket No. 20-027-U: In the Matter of the Application of Walmart Inc. for Approval to Bid Demand Response into Wholesale Electricity Markets Through an Aggregator of Retail Customers.

Issue: Seeking approval to bid demand response into MISO through a third-party aggregator.

Walmart Inc.
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Georgia Public Service Commission Docket Nos. 56002 and 56003

Commonwealth of Virginia State Corporation Commission 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.

Issue: General Rate Case.

Michigan Public Service Commission Case No. U-20697: 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.

Issue: General rate case.

Florida Public Service Commission Consolidated Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, 20200071-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company *et al.*

Issue: Seeking approval of Storm Protection Plans submitted by Tampa Electric Company, Duke Energy Florida, LLC, Gulf Power Company, and Florida Power & Light Company.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00201: Application of Virginia Electric and Power Company for approval of its 2019 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia.

Issue: Seek approval to implement eleven new demand-side management programs, to extend existing programs - some with updated parameters and cost/benefit results, and to continue three rate adjustment clauses.

Public Utility Commission of Texas Docket No. 49737, SOAH Docket No. 473-19-6862: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Acquisition of Wind Generation Facilities.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

Louisiana Public Service Commission Docket No. U-35324: Application of Southwestern Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources in Accordance with the MBM Order and the 1983 and 1994 General Orders.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

2019

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00154: Petition of Virginia Electric and Power Company for approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia, and for approval of an addition to the terms and condition applicable to electric service.

Issue: Seeking approval of certain expenditures relating to grid improvement and grid hardening.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00094: Application of Virginia Electric and Power Company for Approval of a 100 Percent Renewable Energy Tariff, Designated Rider TRG, Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

Issue: Seek approval of a 100 percent renewable energy tariff.

Public Service Commission of South Carolina Docket No. 2019-239-E: In re: Dominion Energy South Carolina, Incorporated's Request for Approval of an Expanded Portfolio of Demand Side Management Programs, and a Modified Demand Side Management Rate Rider.

Issue: Seeking approval of an expanded Demand Side Management Plan and modified Demand Side Management Rate Rider.

Oklahoma Corporation Commission Cause No. PUD 201900048: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Selected Wind Facilities; A Determination there is a Need for the SWFs; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the SWFs; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO in Entitled.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Arkansas Public Service Commission Docket No. 19-035-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire Wind Generating Facilities Pursuant to the Arkansas Clean Energy Development Act.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

COMMISSION DOCKETS (Appearing as Attorney of Record)

2019

Public Utility Commission of Texas Docket No. 49421: Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates.

Issue: General rate case

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

Issue: General rate case

Public Utility Commission of Colorado Docket No. 19AL-0268E: In the Matter of Advice Letter No. 1797 Filed by Public Service Company of Colorado to Reset the Currently Effective General Rate Schedule Adjustment ("GRSA") as Applied to Base Rates for all Electric Rate Schedules as well as Implement a Base Rate kWh Charge, General Rate Schedule Adjustment-Energy ("GRSA-E") to Become Effective June 20, 2019.

Issue: General rate case, Phase I

2018

Public Utility Commission of Texas Docket No. 48371: Entergy Texas, Inc.'s Statement of Intent and Application for Authority to Change Rates.

Issue: General rate case

Walmart Inc.
Exhibit LVP-1

Georgia Public Service Commission Docket Nos. 56002 and 56003

Public Utility Commission of Colorado Docket No. 18M-0074EG: In the Matter of the Commission's Consideration of the Impact of the Federal Tax Cuts and Jobs Act of 2017 on the Rates of Colorado Investor-Owned Electric and Natural Gas Utilities.

Issue: Commenced by the Commission to consider the impacts of the Tax Cut and Jobs Act of 2017 on the revenue requirements and rates of all Colorado investor-owned electric and natural gas utilities.

2017

Public Utility Commission of 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 in Oklahoma.

Issue: Purchase of a wind generation facility and generation tie line.

Public Utility Commission of Texas Docket No. 47527: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 17A-0462EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand-Side Management Plan.

Issue: Seek Commission re-examination and approval of the overall objectives and structure of Public Service's DSM initiatives to guide the Company in designing future DSM plans.

Public Utility Commission of Colorado Docket No. 17AL-0649E: In the Matter of Advice Letter No. 1748-Electric Filed by Public Service Company of Colorado to Revise its PUC No. 8-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective on Thirty Days' Notice.

Issue: General rate case, Phase I

Arkansas Public Service Commission 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.

Issue: Purchase of a wind generation facility and generation tie line.

Louisiana Public Service Commission Docket No. U-34619: 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.

Issue: Purchase of a wind generation facility and generation tie line.

2016

Public Utility Commission of Colorado Docket No. 16AL-0048E: 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.

Issue: General rate case, Phase II

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

Issue: Implement a voluntary solar program offering participating customers the ability to offset their current supply of energy from the Public Service system with solar energy produced at a dedicated facility or facilities.

New Mexico Public Regulation Commission Docket 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 Notice No. 533.

Issue: General rate case

INDUSTRY TRAINING

- 2020 Practical Regulatory Training for the Electric Industry, Center for Public Utilities, New Mexico State University College of Business
- 2020 IPU Accounting and Ratemaking Course, Michigan State University
- 2016 and 2022 Western NARUC Utility Rate School
- EUCI Courses on the utility industry, cost allocation, and rate design.

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:)
Georgia Power Company's 2025) **Docket No. 56002**
Integrated Resource Plan)

In Re:)
Georgia Power Company's Application) **Docket No. 56003**
for Certification, Decertification, and)
Amended Demand-Side Management)
Plan)

CERTIFICATE OF SERVICE

I do hereby certify that I have served the following parties with the foregoing **DIRECT TESTIMONY AND EXHIBIT OF LISA V. PERRY ON BEHALF OF WALMART INC.** via electronic mail as follows:

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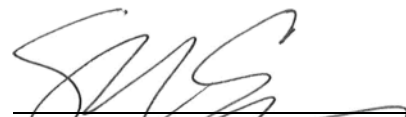
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Dated: May 2, 2025


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