

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 374**

<b>IN THE MATTER OF</b>	<b>)</b>
	<b>)</b>
<b>PACIFICORP D/B/A PACIFIC POWER</b>	<b>)</b>
	<b>)</b>
<b>REQUEST FOR A GENERAL RATE REVISION</b>	<b>)</b>

**DIRECT TESTIMONY AND EXHIBITS OF**

**STEVE W. CHRISS**

**ON BEHALF OF**

**WALMART INC.**

**JUNE 4, 2020**

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## Exhibits

**Walmart/101:** Witness Qualifications Statement

**Walmart/102:** Calculation of Revenue Requirement Impact of Pacific Power's Proposed ROE and Capital Structure vs. Current ROE and Capital Structure

**Walmart/103:** Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

**Walmart/104:** Calculation of Revenue Requirement Impact of Pacific Power's Proposed ROE and Capital Structure vs. National Average ROE for Vertically Integrated Utilities

**Walmart/105:** Walmart Proposed Schedule 200 Energy and Demand Rates for Schedule 30 Secondary

1    **Introduction**

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

3        A.     My name is Steve W. Chriss. My business address is 2608 SE J St., Bentonville,  
4                   AR 72712. I am employed by Walmart Inc. ("Walmart") as Director, Energy  
5                   Services.

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

7        A.     I am testifying on behalf of Walmart.

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

9        A.     In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State  
10                  University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the  
11                  Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My  
12                  duties included research and analysis on domestic and international energy and  
13                  regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility  
14                  Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties  
15                  included appearing as a witness for PUC Staff in electric, natural gas, and  
16                  telecommunications dockets. I joined the energy department at Walmart in July  
17                  2007 as Manager, State Rate Proceedings. I was promoted to Senior Manager,  
18                  Energy Regulatory Analysis, in June 2011. I was promoted to my current position in  
19                  October, 2016 and the position was re-titled in October, 2018. My Witness  
20                  Qualifications Statement is attached as Walmart/101.

1       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE PUBLIC UTILITY**  
2       **COMMISSION OF OREGON (“COMMISSION”)?**

3       A.     Yes. I submitted testimony on behalf of Walmart in Docket Nos. UE 217, UE 262, UE  
4       263, UE 264, UE 267, UE 319, UE 335, and UM 1953 and on behalf of Staff in Docket  
5       Nos. UE 179, UE 180, UG 173, UM 1129, and UX 29.

6       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**  
7       **REGULATORY COMMISSIONS?**

8       A.     Yes. I have submitted testimony in over 220 proceedings before 40 other utility  
9       regulatory commissions. I have also submitted testimony before legislative  
10      committees in Kansas, Missouri, North Carolina, and South Carolina. My testimony  
11      has addressed topics including, but not limited to, cost of service and rate design,  
12      return on equity (“ROE”), revenue requirements, ratemaking policy, large customer  
13      renewable programs, qualifying facility rates, telecommunications deregulation,  
14      resource certification, energy efficiency/demand side management, fuel cost  
15      adjustment mechanisms, decoupling, and the collection of cash earnings on  
16      construction work in progress.

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

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

19      **Q.     PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN OREGON.**

20      A.     As shown on Walmart’s website, Walmart operates 45 retail units and employs over  
21      11,000 associates in Oregon. In fiscal year ending 2020, Walmart purchased \$860

1 million worth of goods and services from Oregon-based suppliers, supporting over  
2 20,000 supplier jobs.<sup>1</sup>

3 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE COMPANY'S**  
4 **SERVICE TERRITORY.**

5 A. Walmart has 17 stores that take electric service from PacifiCorp d/b/a Pacific Power  
6 ("Pacific Power" or "Company"), primarily on the Company's Schedule 30, General  
7 Service Large Nonresidential 201 kW to 999 kW ("Schedule 30") rate schedule.

8  
9 **Purpose of Testimony and Summary of Recommendations**

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

11 A. The purpose of my testimony is to respond to Pacific Power's rate case filing and to  
12 provide recommendations to assist the Commission in its thorough and careful  
13 consideration of the customer impact of the Company's proposed rate increase.

14 **Q. IN SETTING THE REVENUE REQUIREMENT, ROE, ALLOCATION, AND RATE DESIGN**  
15 **CHANGES FOR THE COMPANY, SHOULD THE COMMISSION CONSIDER THE IMPACT**  
16 **OF THE PROPOSED RATE INCREASE ON BUSINESS CUSTOMERS?**

17 A. Yes. Electricity is a significant operating cost for retailers such as Walmart. When  
18 electric rates increase, the increased cost to retailers can put pressure on consumer  
19 prices and on the other expenses required by a business to operate. The  
20 Commission should thoroughly and carefully consider the impact on customers in

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<sup>1</sup> <http://corporate.walmart.com/our-story/locations/united-states#/united-states/oregon>

1 examining the requested revenue requirement and ROE, in addition to all other  
2 facets of this case, to ensure that any increase in the Company's rates is the  
3 minimum amount necessary to provide safe, adequate, and reliable service, while  
4 also providing Pacific Power the opportunity to recover its reasonable and prudent  
5 costs and earn a reasonable return on its investment.

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

7 A. Walmart's recommendations to the Commission are as follows:

- 8 1) The Commission should closely examine the Company's proposed revenue  
9 requirement increase and the associated proposed increase in ROE,  
10 especially when viewed in light of: (1) the customer impact of the resulting  
11 revenue requirement increase; (2) recent rate case ROEs approved by the  
12 Commission; and (3) recent rate case ROEs approved by commissions  
13 nationwide.
- 14 2) Walmart does not take a position on the Company's proposed cost of service  
15 model at this time. However, to the extent that alternative cost of service  
16 methodologies or modifications to the Company's methodology are  
17 proposed by other parties, Walmart reserves the right to address any such  
18 changes in accordance with the Commission's procedures in this docket.
- 19 3) For the purposes of this docket, and because the Company has proposed to  
20 reduce the number of customer classes subject to Rate Mitigation  
21 Adjustment ("RMA") charges and credits, Walmart does not oppose the

1 Company's proposed rate spread and application of the RMA at the  
2 Company's proposed revenue requirement.

3 4) If the Commission determines that the appropriate revenue requirement is  
4 less than that proposed by the Company, the Commission should use the first  
5 \$3.8 million of reduction in revenue from that proposed by the Company to  
6 reduce the Company's proposed RMA charges for Schedules 28 and 30 to  
7 their current levels.

8 5) Walmart does not oppose the Company's proposal to eliminate the declining  
9 block energy charge structure from Schedule 30's basic supply service rates.

10 6) For the purposes of this docket, Walmart proposes that the Commission set  
11 the Schedule 200 basic supply service flat energy charge for Schedule 30 at  
12 the 2021 energy only marginal cost per the Company's cost of service study  
13 results, and assign the remaining Schedule 200 revenue requirement for  
14 Schedule 30 as approved by the Commission to the demand charge.

15 7) The Commission, if it approves the proposed Generation Plant Removal  
16 Adjustment ("Schedule 197"), should require the Company to charge  
17 demand metered customers using a \$/kW demand charge.

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

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

**Revenue Requirement and Return on Equity**

**Q. WHAT REVENUE REQUIREMENT INCREASE DOES THE COMPANY PROPOSE IN ITS FILING?**

A. The Company proposes a total revenue requirement increase for the forecast test year ending December 31, 2021, of approximately \$70.8 million, which is comprised of (1) a non-net power cost ("non-NPC") increase in rates of \$78 million, (2) an increase of \$17.3 million for recovery of early retirement costs for Cholla Unit 4, and (3) a decrease of approximately \$24.9 million from deferred tax benefits associated with the Tax Cuts and Jobs Act. See PAC/200/Lockey/3/12-19 and PAC/1300/McCoy/2/14-15. The Company states that they have also proposed a contemporaneous change in their Transition Adjustment Mechanism ("TAM") that will reduce total retail rates by approximately \$49.2 million, for a total proposed impact across both matters of approximately \$21.6 million. See PAC/200/Lockey/2/3-15.

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

A. The Company presents testimony to support a ROE of 10.2 percent, based on a range of 9.75 percent to 10.25 percent. See PAC/400/Bulkley/4/3-5. The requested ROE at the Company's proposed capital structure of 53.52 percent equity results in a proposed overall rate of return of 7.68 percent. See PAC/300/Kobliha/3/1.

1       **Q.     WHAT ARE THE CURRENTLY APPROVED ROE AND EQUITY RATIO FOR PACIFIC**  
2       **POWER?**

3       A.     The currently effective ROE approved by the Commission for the Company is 9.8  
4       percent and the currently effective equity ratio is 52.1 percent. *See* Order 13-474,  
5       Appendix A, page 4. As such, the proposed ROE represents an increase of 40 basis  
6       points from the Company's currently approved ROE and has a significant impact to  
7       customers.

8       **Q.     IS WALMART CONCERNED THAT THE COMPANY'S PROPOSED ROE IS EXCESSIVE?**

9       A.     Walmart is concerned that the Company's proposed ROE of 10.2 percent is  
10      excessive, especially in light of: (1) the customer impact of the resulting revenue  
11      requirement increase as discussed above; (2) recent rate case ROEs approved by the  
12      Commission; and (3) recent rate case ROEs approved by commissions nationwide.

13  
14      ***Customer Impact of the Proposed Increase in ROE***

15      **Q.     WHAT IS THE REVENUE REQUIREMENT IMPACT OF THE COMPANY'S PROPOSED**  
16      **INCREASE IN ROE AND EQUITY RATIO?**

17      A.     Using the Company's proposed cost of debt and preferred stock, the revenue  
18      requirement impact of the Company's proposed increases in ROE and equity ratio  
19      from those approved in UE 263 is approximately \$16 million, or approximately 20.6  
20      percent of the Company's non-NPC proposed revenue requirement increase. *See*  
21      Walmart/102.

***Recent ROEs Approved by the Commission***

**Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN THE ROES APPROVED BY THE COMMISSION FROM 2017 TO PRESENT?**

A. Yes. During this time period the Commission has issued orders with stated ROEs in two dockets, with the average of the ROEs approved equal to 9.5 percent. See Walmart/103.

**Q. IN WHICH OTHER DOCKETS DID THE COMMISSION ISSUE ORDERS WITH STATED ROES?**

A. The Commission issued orders with stated ROEs in the following dockets:

- Docket No. UE 319, the 2017 Portland General Electric general rate case decided in December, 2017, in which the Commission approved an ROE of 9.5 percent. See Order 17-511, page 6.
- Docket No. UE 335, the 2018 Portland General Electric general rate case decided in December, 2018, in which the Commission approved an ROE of 9.5 percent. See Order 18-464, page 4.

As such, the Company's proposed 10.2 percent ROE is counter to recent Commission actions regarding ROE.

***National Utility Industry ROE Trends***

**Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN THE ROES APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS IN 2017, 2018, 2019, AND SO FAR IN 2020?**

A. Yes. According to data from S&P Global Market Intelligence, a financial news and reporting company, the average of the 127 reported electric utility rate case ROEs authorized by commissions to investor-owned utilities in 2017, 2018, 2019, and so far in 2020, is 9.6 percent. The range of reported authorized ROEs for the period is 8.25 percent to 11.95 percent, and the median authorized ROE is 9.6 percent. The average and median values are significantly below the Company's proposed ROE of 10.2 percent. See Walmart/103. As such, the Company's proposed 10.2 percent ROE is counter to broader electric industry trends.

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

A. In the group reported by S&P Global, the average ROE for vertically integrated utilities authorized from 2017 through present is 9.73 percent, and the trend in these averages has been relatively stable. The average ROE authorized for vertically integrated utilities in 2017 was 9.80 percent; in 2018 it was 9.68 percent; in 2019 it was 9.73 percent; and thus far in 2020 it was 9.69 percent. *Id.* As such, the

Company's proposed 10.2 percent ROE is counter to broader electric industry trends and, in fact, as shown in Figure 1, would be equal to the fifth highest approved ROE for a vertically integrated utility from 2017 to present if approved by the Commission.

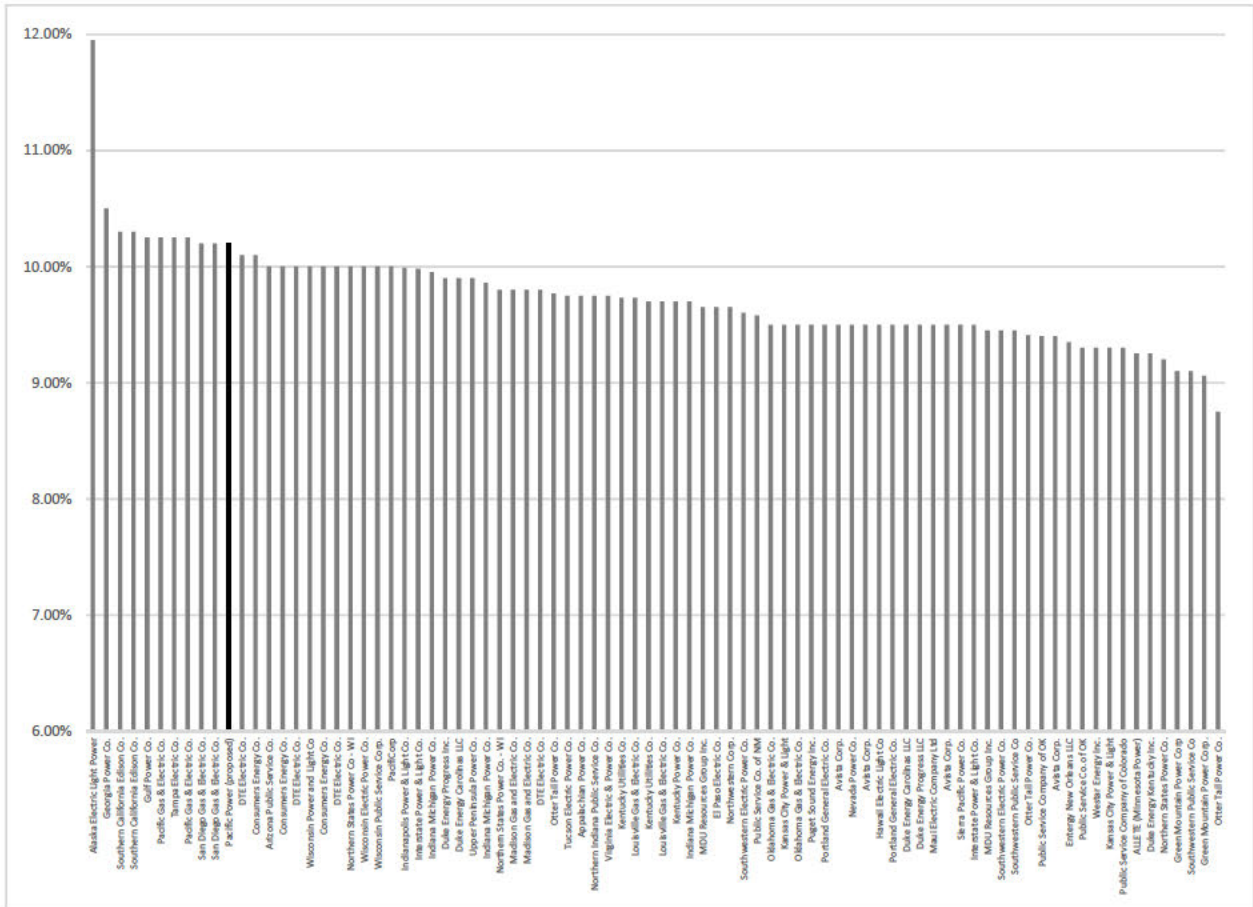


Figure 1. Pacific Power Proposed ROE Versus Authorized ROEs for Vertically Integrated Utilities, 2017 to present. Source: Walmart/103.

**Q. WHAT IS THE REVENUE REQUIREMENT IMPACT IF THE COMMISSION WERE TO AWARD AN ROE OF 9.73 PERCENT, THE AVERAGE ROE AWARDED FOR VERTICALLY INTEGRATED UTILITIES FROM 2016 TO PRESENT?**

A. Assuming Company's proposed cost of debt, preferred stock, and equity ratio, authorizing Pacific Power a ROE of 9.73 percent instead of the requested 10.2

1 percent would result in a reduction to the requested revenue requirement increase  
2 of about \$14.4 million. This represents about an 18.6 percent reduction of the  
3 Company's requested revenue requirement increase. See Walmart/104.

4 **Q. IS WALMART RECOMMENDING THAT THE COMMISSION BE BOUND BY ROEs**  
5 **AUTHORIZED BY OTHER STATE REGULATORY AGENCIES?**

6 A. No. Decisions of other state regulatory commissions are not binding on the  
7 Commission. Additionally, each commission considers the specific circumstances in  
8 each case in its determination of the proper ROE. Walmart is providing this  
9 information to illustrate a national customer perspective on industry trends in  
10 authorized ROE.

11  
12 **Conclusion**

13 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION IN REGARDS TO THE**  
14 **COMPANY'S PROPOSED ROE?**

15 A. The Commission should closely examine the Company's proposed revenue  
16 requirement increase and the associated proposed increase in ROE, especially when  
17 viewed in light of: (1) the customer impact of the resulting revenue requirement  
18 increase as discussed above; (2) recent rate case ROEs approved by the Commission;  
19 and (3) recent rate case ROEs approved by commissions nationwide.

**Cost of Service and Rate Spread**

**Q. WHAT IS WALMART'S POSITION ON SETTING RATES BASED ON THE UTILITY'S COST OF SERVICE?**

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

**Q. DOES WALMART TAKE A POSITION ON THE COMPANY'S PROPOSED COST OF SERVICE METHODOLOGY AT THIS TIME?**

A. No. However, to the extent that alternative cost of service methodologies or modifications to the Company's methodology are proposed by other parties, Walmart reserves the right to address any such changes in accordance with the Commission's procedures in this docket.

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

A. The Company does not represent this relationship through a metric per se, but instead employs Schedule 299, the Rate Mitigation Adjustment ("RMA"), to assign receipt or payment of a subsidy to a particular customer class. An RMA charge for a customer class means that the class is paying a subsidy to other classes, and thus paying rates in excess of the costs incurred to serve that class. An RMA credit for a customer class means that the class is receiving a subsidy, and as a result, paying

1 rates less than the costs incurred to serve that class. In total, those customer classes  
2 with an RMA charge are subsidizing the classes that receive an RMA credit.

3 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED RATE SPREAD?**

4 A. My understanding is that the Company proposes a "base" rate spread that is  
5 consistent with their proposed cost of service study, but that they also propose to  
6 utilize the RMA to limit the rate increase to any class to 10 percent. See  
7 PAC/1400/Meredith/2/4-10. In total, the Company proposes to reduce the pot of  
8 subsidy dollars allocated through the RMA from approximately \$11.7 million to  
9 approximately \$6.65 million. See PAC/1410/Meredith/3.

10 **Q. HAVE YOU EXAMINED THE PROPOSED RMA CHARGE FOR SCHEDULES 30?**

11 A. Yes. The Company proposes an RMA revenue requirement of \$899,000 and charge  
12 of 0.066 cents/kWh for Schedule 30. See PAC/1401/Meredith/63 and  
13 PAC/1410/Meredith/3.

14 **Q. WHAT IS THE CURRENT RMA CHARGE FOR SCHEDULE 30?**

15 A. The current RMA charge is 0.039 cents/kWh for Schedule 30. See P.U.C. OR No. 36,  
16 Second Revision of Sheet 299. The current revenue requirement for the Schedule 30  
17 RMA charge is \$531,000. See PAC/1410/Meredith/3. As such, the Company has  
18 proposed to move Schedule 30 customers away from rates that reflect cost of  
19 service.

1       **Q.     DOES THE COMPANY PROPOSE THAT ANY OTHER CUSTOMER CLASSES BEAR**  
2       **SUBSIDY BURDEN THROUGH THE RMA?**

3       A.     Yes. The Company proposes that the RMA subsidy burden for Schedule 28 increase  
4       from \$2.3 million to \$5.75 million. *Id.*

5       **Q.     HAS PACIFIC POWER PROPOSED TO REDUCE THE NUMBER OF CUSTOMER CLASSES**  
6       **SUBJECT TO RMA CHARGES OR CREDITS?**

7       A.     Yes. Pacific Power proposes to limit the RMA to commercial and industrial classes  
8       and has proposed no charge or credit for Schedules 4, 5, 15, 23/723, 51/751,  
9       53/753, and 54/754. *See* PAC/1401/Meredith/63 and PAC/1410/Meredith/3.

10      **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE**  
11      **AT THE COMPANY'S PROPOSED REVENUE REQUIREMENT?**

12      A.     For the purposes of this docket, and because the Company has proposed to reduce  
13      the number of customer classes subject to RMA charges and credits, at the  
14      Company's proposed revenue requirement, Walmart does not oppose the  
15      Company's proposed rate spread and application of the RMA.

16      **Q.     WHAT IS YOUR RECOMMENDATION TO THE COMMISSION IF IT DETERMINES THAT**  
17      **A LOWER REVENUE REQUIREMENT IS APPROPRIATE?**

18      A.     If the Commission determines that the appropriate revenue requirement is less than  
19      that proposed by the Company, the Commission should use the first \$3.8 million of  
20      reduction in revenue from that proposed by the Company to reduce the Company's  
21      proposed RMA charges for Schedules 28 and 30 to their current levels.

**Schedule 30 Generation Rate Design**

**Q. WHAT IS YOUR UNDERSTANDING OF THE CURRENT STRUCTURE OF THE BASE SUPPLY SERVICE CHARGES FOR SCHEDULE 30?**

A. My understanding of the current structure of the base supply service (Schedule 200) charges for Schedule 30 is that the Company charges a demand charge and a declining two-block energy charge, using a step point of 20,000 kWh in the billing period to move from block one to block two. See P.U.C. Oregon No. 36, Fourth Revision of Sheet No. 200-1.

**Q. DOES PACIFIC POWER PROPOSE CHANGES TO THE BASIC SUPPLY SERVICE RATE STRUCTURE FOR SCHEDULE 30 SECONDARY SERVICE?**

A. Yes. The Company proposes to eliminate the declining block energy charge structure and charge a flat rate for all usage. See PAC/1400/Meredith/48/11-16. Additionally, the Company proposes to set the new flat energy charge at 2.631 cents/kWh, approximately equidistant from the current first block charge of 2.86 cents/kWh and the current second block charge of 2.48 cents/kWh. Additionally, the Company proposes to increase the demand charge from \$1.88/kW to \$1.95/kW. See PAC/1409/Meredith/6.

**Q. DOES WALMART HAVE ANY COMMENTS REGARDING THE COMPANY'S PROPOSED SCHEDULE 200 RATE DESIGN AS IT IS APPLIED TO SCHEDULE 30?**

A. Yes. First, Walmart does not oppose the Company's proposal to eliminate the declining block structure of the energy charge.

1       **Q.       WHAT IS WALMART'S SECOND COMMENT?**

2       A.       Walmart is concerned that the Company's proposed basic supply service rates for  
3               Schedule 30 do not reflect the underlying cost of service and shift cost responsibility  
4               within the customer class in that it charges customers for demand-related costs on  
5               energy charges. Additionally, the proposed rates under-recover demand-related  
6               costs through Schedule 200 and diminish the short-term and long-term capacity  
7               price signals that the Schedule 200 demand charge can provide. In the short-term,  
8               better capacity price signals can inform customer demand management and  
9               technology deployment decisions, as recognition can be brought to bear of the  
10              economic benefits of reducing kW loads on the system in addition to reducing kWh  
11              used. In the long-term, better capacity price signals can help drive customer  
12              decisions regarding facility and equipment sizing and potentially avoid future  
13              capacity needs on the system.

14      **Q.       WHAT IS YOUR UNDERSTANDING OF THE COST OF SERVICE STUDY RESULTS FOR**  
15      **SCHEDULE 30 SECONDARY CUSTOMERS?**

16      A.       As shown in Table 1 below, my understanding is that the combined rate case and  
17               TAM marginal cost of service study results show that approximately 34 percent of  
18               the generation costs incurred by Pacific Power to serve Schedule 30 Secondary  
19               customers are demand-related while 66 percent are energy-related.

**Table 1. Schedule 30 Secondary Marginal Cost of Service Study Results vs. Proposed Basic Supply Service and Schedule 201 Revenue Requirements.**

Component	MCOSS Results		Schedule 30 Secondary Revenue Requirement	
	(\$000)	(% of Total)	(\$000)	(% of Total)
Demand	\$23,482	34.0	\$6,796	9.5
Energy	\$45,596	66.0	\$64,961	90.5
<b>Total</b>	<b>\$69,078</b>	<b>100</b>	<b>\$71,758</b>	<b>100</b>

Sources: OR GRC MC Study Dec 2021, Tbl3 and Meredith OR CY2021 GRC Pricing Model, 1409 3+ Exhibit Blocking

**Q. HAS THE COMPANY CALCULATED A DEMAND CHARGE BASED ON THE MARGINAL COST OF SERVICE STUDY RESULTS?**

A. Yes. An examination of the Company's marginal cost of service study results suggest that a demand charge based on 20-year marginal demand costs would be approximately \$5.89/kW<sup>2</sup>, versus the \$1.95/kW proposed by the Company. See PAC/ 1408/Meredith/21.

**Q. IS THE RECOVERY OF DEMAND-RELATED COSTS THROUGH ENERGY CHARGES APPROPRIATE?**

A. No. The recovery of demand-related costs through energy charges is inappropriate and violates cost causation principles.

**Q. PLEASE EXPLAIN.**

A. The shift in demand-related costs from per kW demand charges to per kWh energy charges results in a shift in demand cost responsibility from lower load factor customers to higher load factor customers. This results in a misallocation of cost

<sup>2</sup> \$5.89/kW = \$19,633,000 revenue requirement / 277,617 average billing kW / 12.

responsibility as higher load factor customers overpay for the demand-related costs incurred by the Company to serve them. In other words, higher load factor customers are paying for a portion of the demand-related costs that are incurred to serve lower load factor customers simply because of the manner in which the Company recovers those costs in rates.

**Q. CAN YOU PROVIDE A GENERAL ILLUSTRATION OF THIS SHIFT IN DEMAND COST RESPONSIBILITY?**

A. Yes. Assume the following:

- 1) A utility has only two customers (Customer 1 and Customer 2), with individual peak demands of 20 kW for a total system load of 40 kW.
- 2) The annual revenue requirement or cost to the utility associated with the investment to serve these customers is \$2,000, which will be recovered each year. Each customer is responsible for one-half of the cost, or \$1,000 of demand-related or fixed costs per customer.
- 3) Customer 1 has a monthly demand of 20 kW and a load factor of 60 percent and consumes 105,120 kWh/year ( $20 \text{ kW} * 60\% * 8760 \text{ hours}$ ).
- 4) Customer 2 has a monthly demand of 20 kW and a load factor of 30 percent and consumes 52,560 kWh/year ( $20 \text{ kW} * 30\% * 8760 \text{ hours}$ ).

**Q. IF THE DEMAND-RELATED COSTS WERE RECOVERED THROUGH A DEMAND CHARGE ON A PER KW BASIS, WHAT WOULD THE PER KW CHARGE BE?**

A. The charge would be \$4.17 per kW-month ( $\$2,000 / 40 \text{ kW} / 12 \text{ months}$ ). Each customer would then pay \$1,000 for the demand-related cost they impose on the system ( $20 \text{ kW} * \$4.17/\text{kW} * 12$ ).

**Q. IF THE DEMAND-RELATED COSTS WERE RECOVERED ON AN ENERGY BASIS, WHAT WOULD THE PER KWH CHARGE BE?**

A. If customers were charged on a per kWh basis, the energy charge would be 1.27 cents per kWh ( $\$2,000 / 157,860 \text{ kWh}$ ), where the \$2,000 is the total cost and 157,860 kWh represents the total annual energy sales.

**Q. WHAT WOULD EACH CUSTOMER PAY UNDER THE PER KWH CHARGE OF 1.27 CENTS PER KWH?**

A. Customer 1, the customer with the higher load factor of 60 percent, would pay \$1,333 ( $\$0.0127/\text{kWh} * 105,120 \text{ kWh}$ ). Customer 2, the customer that has the lower load factor would pay \$667 ( $\$0.0127/\text{kWh} * 52,560 \text{ kWh}$ ).

**Q. ARE THE RESULTING ENERGY BASED CHARGES REPRESENTATIVE OF THE UNDERLYING COSTS?**

A. No. As the example makes clear, if a utility recovers its demand-related costs through energy-based charges, it will over-collect from one customer and under-collect from the other. The fixed costs are equally incurred by Customer 1 and Customer 2, however, under the per kWh scenario, the utility would recover \$333

1 more from Customer 1 (a higher load factor customer) than its cost responsibility  
2 and \$333 less from Customer 2 (a lower load factor customer) than its cost  
3 responsibility. In other words, Customer 1, would be subsidizing one-third of  
4 Customer 2's cost responsibility.

5 **Q. WOULD THE PROPER RECOVERY OF DEMAND-RELATED COSTS THROUGH A**  
6 **DEMAND CHARGE PROVIDE BENEFITS TO THE COMPANY?**

7 A. Yes. By collecting more demand-related costs through the energy charge, the  
8 Company could be more susceptible to weather-related and other fluctuations in  
9 usage than it would be were those costs recovered through a demand charge. A  
10 rate design that properly collects fixed costs through a \$/kW demand charge and  
11 energy-related costs through \$/kWh variable charges should provide greater  
12 revenue certainty and more stable utility earnings.

13 **Q. WHAT IS WALMART'S RECOMMENDATION ON THIS ISSUE?**

14 A. For the purposes of this docket, Walmart proposes that the Commission set the  
15 Schedule 200 basic supply service flat energy charge for Schedule 30 at the 2021  
16 energy only marginal cost per the Company's cost of service study result, and assign  
17 the remaining Schedule 200 revenue requirement as approved by the Commission  
18 to the demand charge.

1       **Q.     HAVE YOU CALCULATED ILLUSTRATIVE RATES OF THIS RATE DESIGN AT THE**  
2       **COMPANY’S PROPOSED REVENUE REQUIREMENT?**

3       A.     Yes. Using the Company’s proposed flat energy rate design for Schedule 200, this  
4       would result in an energy charge of \$0.02072/kWh and a demand charge of  
5       \$3.98/kW. See Walmart/105. This would result in the demand charge being set at  
6       approximately 68 percent of its cost-based level.

7  
8       **Schedule 197 Rate Design**

9       **Q.     WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S PROPOSED SCHEDULE 197?**

10      A.     My understanding is that the Company proposes Schedule 197 to recover  
11      retirement costs of Cholla Unit 4, and includes regulatory assets and estimated  
12      decommissioning costs not already recovered in depreciation rates. See  
13      PAC/1300/McCoy/33/18-20.

14      **Q.     HOW DOES THE COMPANY PROPOSE TO SPREAD THE SURCHARGE TO**  
15      **CUSTOMERS?**

16      A.     The Company proposes to spread the surcharge to customers on the basis of base  
17      generation revenue requirement. See PAC/1400/Meredith/24/11-13.

18      **Q.     HOW DOES THE COMPANY PROPOSE TO CHARGE DEMAND-METERED CUSTOMERS**  
19      **FOR SCHEDULE 197?**

20      A.     The Company proposes to charge demand-metered customers using a \$/kWh  
21      energy charge. See PAC/1410/Meredith/6.

1       **Q.        DOES WALMART HAVE A CONCERN WITH THE COMPANY’S PROPOSED SCHEDULE**  
2       **197 RATE DESIGN?**

3       A.       Yes. While the Cholla Unit 4 costs would no longer be incurred for the provision of  
4       service to customers, retirement and decommissioning activities are related to the  
5       fixed generation asset, not the variable costs related to the production of electrons.  
6       As such, it is more appropriate to charge customers for these costs on a demand  
7       basis, as it is more reflective of the fixed nature of the costs and how those costs  
8       would traditionally be classified within a cost of service study.

9       **Q.        WHAT IS WALMART’S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

10      A.       The Commission, if it approves Schedule 197, should require the Company to charge  
11      demand metered customers using a \$/kW demand charge.

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

13      A.       Yes.

# Steve W. Chriss

Walmart Inc.

Business Address: 2608 SE J Street, Bentonville, AR 72716

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## EXPERIENCE

July 2007 – Present

**Walmart Inc.**, Bentonville, AR

**Director, Energy Services** (October 2018 – Present)

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

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

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

June 2003 – July 2007

**Public Utility Commission of Oregon**, Salem, OR

**Senior Utility Analyst** (February 2006 – July 2007)

**Economist** (June 2003 – February 2006)

January 2003 - May 2003

**North Harris College**, Houston, TX

**Adjunct Instructor, Microeconomics**

June 2001 - March 2003

**Econ One Research, Inc.**, Houston, TX

**Senior Analyst** (October 2002 – March 2003)

**Analyst** (June 2001 – October 2002)

## EDUCATION

2001

**Louisiana State University**

M.S., Agricultural Economics

1997-1998

**University of Florida**

Graduate Coursework, Agricultural Education and Communication

1997

**Texas A&M University**

B.S., Agricultural Development

B.S., Horticulture

## PRESENT MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Arizonans for Electric Choice & Competition, Chairman

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

Renewable Energy Buyers Alliance, Advisory Board

## PAST MEMBERSHIPS

Southwest Power Pool, Corporate Governance Committee, 2019

## TESTIMONY BEFORE REGULATORY COMMISSIONS

2020

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

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

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

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

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

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

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

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

#### **2019**

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

Michigan Case No. U-20561: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Indiana Cause No. 45253: Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code §§ 8-1-2-42.7 and 8-1-2-61, For (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Step-In of New Rates and Charges Using a Forecasted Test Period; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of a Federal Mandate Certificate Under Ind. Code § 8-1-8.4-1; (4) Approval of Revised Electric Depreciation Rates Applicable to its Electric Plant in Service; (5) Approval of Necessary and Appropriate Accounting Deferral Relief; and (6) Approval of a Revenue Decoupling Mechanism for Certain Customer Classes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *2018*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 2017

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

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

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

Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**2016**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 2015

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Michigan Public Service Commission Case No. U-17767: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

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

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

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

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

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

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

#### **2014**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### *2013*

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

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

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

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

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

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

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

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

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

Arkansas Public Service Commission Docket No. 13-028-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

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

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

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

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

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

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

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

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

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

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

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

**2012**

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

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

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

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

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

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

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

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

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

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

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

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

Colorado Public Utilities Commission Docket No. 11AL-947E: In the Matter of Advice Letter No. 1597-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Changes Effective December 23, 2011.

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

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

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

#### *2011*

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

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

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

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

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

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

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

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

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

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

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

Virginia State Corporation Commission Case No. PUE-2011-00045: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

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

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

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

Michigan Public Service Commission Case No. U-16472: In the Matter of the Detroit Edison Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

#### *2010*

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

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

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

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

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

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

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

Colorado Public Utilities Commission Docket No. 10M-245E: In the Matter of Commission Consideration of Public Service Company of Colorado Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

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

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

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

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

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

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

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

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

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

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

Arkansas Public Service Commission Docket No. 09-084-U: In the Matter of the Application of Entergy Arkansas, Inc. For Approval of Changes in Rates for Retail Electric Service.

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

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

2009

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

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

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

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

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

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

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peak, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

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

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

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

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

2008

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

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

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

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

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

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

#### 2007

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

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

#### 2006

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

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

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

#### 2005

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

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

#### 2004

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

## **TESTIMONY BEFORE LEGISLATIVE BODIES**

### **2020**

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

### **2019**

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

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

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

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

### **2018**

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

### **2017**

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

### **2016**

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

### **2014**

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

### **2012**

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

### **2011**

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

## **AFFIDAVITS**

### **2015**

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

### **2011**

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

**ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Panelist, M-RETS Stakeholder Summit, Minneapolis, Minnesota, October 5, 2016.

Panelist, 40<sup>th</sup> Governor's Conference on Energy & the Environment, Kentucky Energy and Environment Cabinet, Lexington, Kentucky, September 21, 2016.

Panelist, Trends in Customer Expectations, Wisconsin Public Utility Institute, Madison, Wisconsin, September 6, 2016.

Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.

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## Calculation of Revenue Requirement Impact of Pacific Power's Proposed ROE and Capital Structure vs. Current ROE and Capital Structure

(1)	PAC/300/Kobilha/3	Pacific Power requested rate of return	7.68%
1) Calculate Rate of Return Using ROE = 9.8% and Equity Ratio = 52.1%			
		<b>Capital Component</b>	<b>Percentage of Total Cost Weighted Cost</b>
(2)	PAC/300/Kobilha/3	Long Term Debt	47.60% 4.77% 2.27%
(3)	PAC/300/Kobilha/3	Preferred Stock	0.30% 6.75% 0.02%
(4)	Order 13-474, Appendix A, page 4	Common Equity	52.10% 9.80% 5.11%
(5)	(2) + (3) + (4)	<b>Rate of Return (Current ROE &amp; Equity Ratio)</b>	<b>7.40%</b>
2) Calculate Revenue Requirement Impact at the Proposed ROE			
(6)	PAC/1302/McCoy/6	Rate Base (\$)	\$ 4,194,704,290
(7)	= (4)	Rate of Return (ROE = 9.9% and Equity Ratio = 52%)	7.40%
(8)	(5) x (6)	Adjusted Income Requirement (Current ROE & Equity Ratio)	\$ 310,264,239
(9)	PAC/1302/McCoy/6	Pacific Power Proposed Income Requirement (\$000)	\$ 321,999,512
(10)	(8) - (7)	Difference in Income Requirement (\$000)	\$ 11,735,273
(11)	PAC/1302/McCoy/6	Net to Gross Conversion Factor	137.08%
(12)	(9) x (10)	<b>Difference in Revenue Requirement (\$000)</b>	<b>\$ 16,086,712</b>
(13)	PAC/1302/McCoy/2	Requested Non-NPC Revenue Requirement Increase (\$000)	\$ 77,993,178
(14)	(12) / (13)	<b>Percent of Non-NPC Increase from ROE Increase</b>	<b>20.63%</b>

## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Docket	Proposed Return on Equity	Decision Date	Vertically Integrated (V)/Distribution (D)	Approved Return on Equity (%)	Reduction from Proposed (BP)
Wyoming	MDU Resources Group Inc.	2004-117-ER-16	10.10%	1/18/2017	V	9.45%	(65)
New York	Consolidated Edison Co. of NY	16-E-0060	9.75%	1/24/2017	D	9.00%	(75)
Michigan	DTE Electric Co.	U-18014	10.50%	1/31/2017	V	10.10%	(40)
Maryland	Delmarva Power & Light Co.	9424	10.60%	2/15/2017	D	9.60%	(100)
New Jersey	Rockland Electric Company	ER-16050428	10.20%	2/22/2017	D	9.60%	(60)
Arizona	Tucson Electric Power Co.	E-01933A-15-0322	10.35%	2/24/2017	V	9.75%	(60)
Michigan	Consumers Energy Co.	U-17990	10.70%	2/28/2017	V	10.10%	(60)
Minnesota	Otter Tail Power Co.	E-017/GR-15-1033	10.05%	3/2/2017	V	9.41%	(64)
Oklahoma	Oklahoma Gas & Electric Co.	PUD 201500273	10.25%	3/20/2017	V	9.50%	(75)
Florida	Gulf Power Co.	160186-EI	11.00%	4/4/2017	V	10.25%	(75)
New Hampshire	Liberty Utilities Granite St	DE-16-383	10.30%	4/12/2017	D	9.40%	(90)
New Hampshire	Unitil Energy Systems Inc.	DE-16-384	10.30%	4/20/2017	D	9.50%	(80)
Missouri	Kansas City Power & Light	ER-2016-0285	9.90%	5/3/2017	V	9.50%	(40)
Minnesota	Northern States Power Co.	E-022/GR-15-826	10.00%	5/11/2017	V	9.20%	(80)
Arkansas	Oklahoma Gas & Electric Co.	16-052-U	10.25%	5/18/2017	V	9.50%	(75)
Delaware	Delmarva Power & Light Co.	16-0649	10.60%	5/23/2017	D	9.70%	(90)
North Dakota	MDU Resources Group Inc.	PU-16-666	10.00%	6/16/2017	V	9.65%	(35)
Kentucky	Kentucky Utilities Co.	2016-00370	10.23%	6/22/2017	V	9.70%	(53)
Kentucky	Louisville Gas & Electric Co.	2016-00371	10.23%	6/22/2017	V	9.70%	(53)
District of Columbia	Potomac Electric Power Co.	FC-1139	10.60%	7/24/2017	D	9.50%	(110)
Arizona	Arizona Public Service Co.	E-01345A-16-0036	10.50%	8/15/2017	V	10.00%	(50)
New Jersey	Atlantic City Electric Co.	ER-17030308	10.10%	9/22/2017	D	9.60%	(50)
Texas	Oncor Electric Delivery Co.	46957	10.25%	9/28/2017	D	9.80%	(45)
Maryland	Potomac Electric Power Co.	9443	10.10%	10/20/2017	D	9.50%	(60)
California	Pacific Gas & Electric Co.	Advice No. 5148-E	10.25%	10/26/2017	V	10.25%	-
California	San Diego Gas & Electric Co.	Advice No. 3120-E	10.20%	10/26/2017	V	10.20%	-
California	Southern California Edison Co.	Advice No. 3665-E	10.30%	10/26/2017	V	10.30%	-
Florida	Tampa Electric Co.	20170210-EI	N/A	11/6/2017	V	10.25%	N/A
Alaska	Alaska Electric Light Power	U-16-086	13.80%	11/15/2017	V	11.95%	(185)
Massachusetts	NSTAR Electric Co.	17-05	10.50%	11/30/2017	D	10.00%	(50)
Massachusetts	Western Massachusetts Electric	17-05	10.50%	11/30/2017	D	10.00%	(50)
Washington	Puget Sound Energy Inc.	UE-170033	9.80%	12/5/2017	V	9.50%	(30)
Illinois	Ameren Illinois	17-0197	8.40%	12/6/2017	D	8.40%	-
Illinois	Commonwealth Edison Co.	17-0196	8.40%	12/6/2017	D	8.40%	-
Wisconsin	Northern States Power Co. - WI	4220-UR-123	10.00%	12/7/2017	V	9.80%	(20)
Texas	El Paso Electric Co.	46831	10.50%	12/14/2017	V	9.65%	(85)
Texas	Southwestern Electric Power Co.	46449	10.00%	12/14/2017	V	9.60%	(40)
Oregon	Portland General Electric Co.	UE 319	9.75%	12/18/2017	V	9.50%	(25)
New Mexico	Public Service Co. of NM	16-00276-UT	10.13%	12/20/2017	V	9.58%	(55)
Idaho	Avista Corp.	AVU-E-17-01	9.90%	12/28/2017	V	9.50%	(40)
Nevada	Nevada Power Co.	17-06003	10.10%	12/29/2017	V	9.50%	(60)
Vermont	Green Mountain Power Corp	17-3112-INV	9.50%	12/21/2017	V	9.10%	(40)
Kentucky	Kentucky Power Co.	2017-00179	10.31%	1/18/2018	V	9.70%	(61)
Oklahoma	Public Service Co. of OK	PUD 201700151	10.00%	1/31/2018	V	9.30%	(70)
Iowa	Interstate Power & Light Co.	RPU-2017-0001	10.57%	2/2/2018	V	9.98%	(59)
North Carolina	Duke Energy Progress Inc.	E-2, Sub 1142	10.75%	2/23/2018	V	9.90%	(85)
Minnesota	ALLETE (Minnesota Power)	E-015/GR-16-664	10.15%	3/12/2018	V	9.25%	(90)
New York	Niagara Mohawk Power Corp.	17-E-0238	9.79%	3/15/2018	D	9.00%	(79)
Michigan	Consumers Energy Co.	U-18322	10.50%	3/29/2018	V	10.00%	(50)
Connecticut	Connecticut Light and Power	17-10-46	10.50%	4/18/2018	D	9.25%	(125)
Michigan	DTE Electric Co.	U-18255	10.50%	4/18/2018	V	10.00%	(50)
Washington	Avista Corp.	UE-170485	9.90%	4/26/2018	V	9.50%	(40)
Indiana	Indiana Michigan Power Co.	44967	10.60%	5/30/2018	V	9.95%	(65)
Maryland	Potomac Electric Power Co.	9472	10.10%	5/31/2018	D	9.50%	(60)
New York	Central Hudson Gas & Electric	17-E-0459	9.50%	6/14/2018	D	8.80%	(70)
North Carolina	Duke Energy Carolinas LLC	E-7, Sub 1146	10.75%	6/22/2018	V	9.90%	(85)
Maine	Emera Maine	2017-00198	9.50%	6/28/2018	D	9.35%	(15)
Hawaii	Hawaii Electric Light Co	2015-0170	10.60%	6/29/2018	V	9.50%	(110)
District of Columbia	Potomac Electric Power Co.	FC-1150	10.10%	8/8/2018	D	9.53%	(57)
Delaware	Delmarva Power & Light Co.	17-0977	10.10%	8/21/2018	D	9.70%	(40)
Rhode Island	Narragansett Electric Co.	4770 (electric)	10.10%	8/24/2018	D	9.28%	(82)
New Mexico	Southwestern Public Service Co	17-00255-UT	10.25%	9/5/2018	V	9.10%	(115)

## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Docket	Proposed Return on Equity	Decision Date	Vertically Integrated (V)/Distribution (D)	Approved Return on Equity (%)	Reduction from Proposed (BP)
Wisconsin	Wisconsin Power and Light Co	6680-UR-121 (Elec)	10.00%	9/14/2018	V	10.00%	-
Wisconsin	Madison Gas and Electric Co.	3270-UR-122 (Elec)	9.80%	9/20/2018	V	9.80%	-
North Dakota	Otter Tail Power Co.	PU-17-398	10.30%	9/26/2018	V	9.77%	(53)
Ohio	Dayton Power and Light Co.	15-1830-EL-AIR	10.50%	9/26/2018	D	9.99% *	(50)
Kansas	Westar Energy Inc.	18-WSEE-328-RTS	9.85%	9/27/2018	V	9.30%	(55)
Pennsylvania	UGI Utilities Inc.	R-2017-2640058	11.25%	10/4/2018	D	9.85%	(140)
New Jersey	Public Service Electric Gas	ER18010029	10.30%	10/29/2018	D	9.60%	(70)
Indiana	Indianapolis Power & Light Co.	45029	10.32%	10/31/2018	V	9.99%	(33)
Illinois	Ameren Illinois	18-0807	8.69%	11/1/2018	D	8.69%	-
Illinois	Commonwealth Edison Co.	18-0808	8.69%	12/4/2018	D	8.69%	-
Kansas	Kansas City Power & Light	18-KCPE-480-RTS	9.85%	12/13/2018	V	9.30%	(55)
Oregon	Portland General Electric Co.	UE-335	9.50%	12/14/2018	V	9.50%	-
Ohio	Duke Energy Ohio Inc.	17-0032-EL-AIR	10.40%	12/19/2018	D	9.84%	(56)
Texas	Texas-New Mexico Power Co.	48401	10.50%	12/20/2018	D	9.65%	(85)
Wisconsin	Madison Gas and Electric Co.	3270-UR-122 (Elec)	9.80%	12/20/2018	V	9.80%	-
Vermont	Green Mountain Power Corp.	18-0974-TF	9.30%	12/21/2018	D	9.30%	-
Michigan	Consumers Energy Co.	U-20134	10.75%	1/9/2019	V	10.00%	(75)
West Virginia	Appalachian Power Co.	18-0646-E-42T	10.22%	2/27/2019	V	9.75%	(47)
New Jersey	Atlantic City Electric Co.	ER18080925	10.10%	3/13/2019	D	9.60%	(50)
New York	Orange & Rockland Utilities Inc.	18-E-0067	9.75%	3/14/2019	D	9.00%	(75)
Oklahoma	Public Service Company of OK	PUD201800097	10.30%	3/14/2019	V	9.40%	(90)
Maryland	Potomac Edison Co.	9490	10.80%	3/22/2019	D	9.65%	(115)
Kentucky	Kentucky Utilities Co.	2018-00294	10.42%	4/30/2019	V	9.73%	(69)
Kentucky	Louisville Gas & Electric Co.	2018-00295	10.42%	4/30/2019	V	9.73%	(69)
South Carolina	Duke Energy Carolinas LLC	2018-319-E	10.50%	5/1/2019	V	9.50%	(100)
Michigan	DTE Electric Co.	U-20162	10.50%	5/2/2019	V	10.00%	(50)
South Carolina	Duke Energy Progress LLC	2018-318-E	10.50%	5/8/2019	V	9.50%	(100)
South Dakota	Otter Tail Power Co.	EL18-021	10.30%	5/14/2019	V	8.75%	(155)
Hawaii	Maui Electric Company Ltd	2017-0150	10.60%	5/16/2019	V	9.50%	(110)
Michigan	Upper Peninsula Power Co.	U-20276	10.50%	5/23/2019	V	9.90%	(60)
Maryland	Potomac Electric Power Co.	9602	10.30%	8/12/2019	D	9.60%	(70)
Vermont	Green Mountain Power Corp.	19-1932-TF	9.16%	8/29/2019	V	9.06%	(10)
Wisconsin	Northern States Power Co - WI	4220-UR-124	N/A	9/4/2019	V	10.00%	N/A
Massachusetts	Massachusetts Electric Co.	DPU-18-150	10.50%	9/30/2019	D	9.60%	(90)
Montana	Northwestern Corp.	D2018.2.12	10.65%	10/29/2019	V	9.65%	(100)
Wisconsin	Wisconsin Electric Power Co.	05-UR-109	10.35%	10/31/2019	V	10.00%	(35)
Wisconsin	Wisconsin Public Service Corp.	6690-UR-126	10.35%	10/31/2019	V	10.00%	(35)
Louisiana	Entergy New Orleans LLC	UD-18-07	10.50%	11/7/2019	V	9.35%	(115)
Idaho	Avista Corp.	AVU-E-19-04	9.90%	11/29/2019	V	9.50%	(40)
Illinois	Commonwealth Edison Co.	19-0387	8.91%	12/4/2019	D	8.91%	-
Indiana	Northern Indiana Public Service Co.	45159	10.80%	12/4/2019	V	9.75%	(105)
Illinois	Ameren Illinois	19-0436	8.91%	12/16/2019	D	8.91%	-
Georgia	Georgia Power Co.	42516	10.90%	12/17/2019	V	10.50%	(40)
Maryland	Baltimore Gas and Electric Co.	9610	10.30%	12/17/2019	D	9.70%	(60)
California	Pacific Gas & Electric Co.	A-19-04-015	12.00%	12/19/2019	V	10.25%	(175)
California	San Diego Gas & Electric Co.	A-19-04-017	12.38%	12/19/2019	V	10.20%	(218)
California	Southern California Edison Co.	A-19-04-014	11.45%	12/19/2019	V	10.30%	(115)
Arkansas	Southwestern Electric Power Co.	19-008-U	10.50%	12/20/2019	V	9.45%	(105)
Nevada	Sierra Pacific Power Co.	19-06002	10.21%	12/24/2019	V	9.50%	(71)
Iowa	Interstate Power & Light Co.	RPU-2019-0001	10.25%	1/8/2020	V	9.50% ¥	(75)
New York	Consolidated Edison Co. of NY	19-E-0065	9.75%	1/16/2020	D	8.80%	(95)
New Jersey	Rockland Electric Company	ER19050552	9.60%	1/22/2020	D	9.50%	(10)
Michigan	Indiana Michigan Power Co.	U-20359	10.50%	1/23/2020	V	9.86%	(64)
California	PacificCorp	A-18-04-002	10.60%	2/6/2020	V	10.00%	(60)
Colorado	Public Service Company of Colorado	19AL-0268E	10.20%	2/11/2020	V	9.30%	(90)
Texas	Centerpoint Energy	49421	10.40%	2/14/2020	D	9.40%	(100)
Maine	Central Maine Power Co.	2018-00194	10.00%	2/19/2020	D	8.25%	(175)
North Carolina	Virginia Electric & Power Co.	E-22 Sub 562	10.75%	2/24/2020	V	9.75%	(100)
Texas	AEP Texas Inc.	49494	10.50%	2/27/2020	D	9.40%	(110)
Indiana	Indiana Michigan Power Co.	45235	10.50%	3/11/2020	V	9.70%	(80)
Washington	Avista Corp.	UE-190334	9.90%	3/25/2020	V	9.40%	(50)
Massachusetts	Fitchburg Gas & Electric Light	DPU 19-130	10.50%	4/17/2020	D	9.70%	(80)
Kentucky	Duke Energy Kentucky Inc.	2019-00271	9.80%	4/27/2020	V	9.25%	(55)

## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Docket	Proposed Return on Equity	Decision Date	Vertically Integrated (V)/Distribution (D)	Approved Return on Equity (%)	Reduction from Proposed (BP)
Michigan	DTE Electric Co.	U-20561	10.50%	5/8/2020	V	9.80%	(70)
New Mexico	Southwestern Public Service Co	19-00170-UT	10.10%	5/20/2020	V	9.45%	(65)
<b>Entire Period</b>							
# of Decisions		127					
Average (All Utilities)			10.24%			9.60%	(64)
Average (Distribution Only)			10.01%			9.36%	(64)
Average (Vertically Integrated Only)			10.37%			9.73%	(64)
Median			10.30%			9.60%	
Minimum			8.40%			8.25%	
Maximum			13.80%			11.95%	
Oregon		2	9.63%			9.50%	(13)
<b>2017</b>							
# of Decisions		42					
Average (All Utilities)			10.22%			9.68%	(54)
Average (Distribution Only)			10.04%			9.43%	(61)
Average (Distribution Only, exc. IL FRP)			10.34%			9.61%	(73)
Average (Vertically Integrated Only)			10.31%			9.80%	(50)
<b>2018</b>							
# of Decisions		36					
Average (All Utilities)			10.10%			9.54%	(56)
Average (Distribution Only)			9.96%			9.38%	(58)
Average (Distribution Only, exc. IL FRP)			10.14%			9.47%	(66)
Average (Vertically Integrated Only)			10.22%			9.68%	(54)
<b>2019</b>							
# of Decisions		33					
Average (All Utilities)			10.43%			9.64%	(79)
Average (Distribution Only)			9.95%			9.39%	(55)
Average (Distribution Only, exc. IL FRP)			10.29%			9.53%	(77)
Average (Vertically Integrated Only)			10.59%			9.73%	(86)
<b>2020</b>							
# of Decisions		16					
Average (All Utilities)			10.24%			9.44%	(80)
Average (Distribution Only)			10.13%			9.18%	(95)
Average (Vertically Integrated Only)			10.31%			9.69%	(62)

Source: S&amp;P Global Market Intelligence

Last Updated: 6/2/2020

\* Due to Rounding, the ROE Award is reported as 10.00 on the S&amp;P Global Website.

‡ S&amp;P incorrectly reports this value as 9.9%

Ω Utility did not file a full rate case, approved ROE based on a settlement

¥ S&amp;P incorrectly reports this value as 10.02%

## Calculation of Revenue Requirement Impact of Pacific Power's Proposed ROE and Capital Structure vs. National Average ROE for Vertically Integrated Utilities

(1) PAC/300/Kobilha/3 Pacific Power requested rate of return 7.68%

1) Calculate Rate of Return Using ROE = 9.73%

		Percentage of		
		Total	Cost	Weighted Cost
	Capital Component			
(2)	PAC/300/Kobilha/3 Long Term Debt	46.47%	4.77%	2.22%
(3)	PAC/300/Kobilha/3 Preferred Stock	0.01%	6.75%	0.00%
(4)	PAC/300/Kobilha/3 Common Equity	53.52%	9.73%	5.21%
(5)	(2) + (3) + (4) <b>Rate of Return (Current ROE &amp; Equity Ratio)</b>			<b>7.42%</b>

2) Calculate Revenue Requirement Impact at the Proposed ROE

(6)	PAC/1302/McCoy/6	Rate Base (\$)	\$ 4,194,704,290
(7)	= (4)	Rate of Return (ROE = 9.73%)	7.42%
(8)	(5) x (6)	Adjusted Income Requirement (Current ROE & Equity Ratio)	\$ 311,447,985
(9)	PAC/1302/McCoy/6	Pacific Power Proposed Income Requirement (\$000)	\$ 321,999,512
(10)	(8) - (7)	Difference in Income Requirement (\$000)	\$ 10,551,527
(11)	PAC/1302/McCoy/6	Net to Gross Conversion Factor	137.08%
(12)	(9) x (10)	<b>Difference in Revenue Requirement (\$000)</b>	<b>\$ 14,464,034</b>
(13)	PAC/1302/McCoy/2	Requested Non-NPC Revenue Requirement Increase (\$000)	\$ 77,993,178
(14)	(12) / (13)	<b>Percent of Non-NPC Increase from ROE Increase</b>	<b>18.55%</b>

### Walmart Proposed Schedule 200 Energy and Demand Rates for Schedule 30 Secondary

Energy Charge - Schedule 200	Forecast Billing Determinants (kW or kWh) (1)	WMT Proposed Energy Rate (\$/kWh) (2)	Revenue Requirement (\$) (3) (1) x (2)	WMT Proposed Demand Rate (\$/kW) (4) (3) / (1)
Demand Charge, per kW	3,485,385		\$ 13,860,471	\$ 3.98
1st 20,000 kWh, per kWh	186,649,079	\$ 0.02072	\$ 3,867,369	
All additional kWh, per kWh	1,077,030,703	\$ 0.02072	\$ 22,316,076	
<b>Total</b>			\$ 26,183,445	
		Target Total Revenue Requirement	\$ 40,043,916	
		Assign to Demand Charge	\$ 13,860,471	

Source:

Meredith OR CY 2021 GRC Pricing Model, 1409 3+ Exhibit Blocking