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June 11, 2024

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Petition for Rate Increase by Duke Energy Florida, LLC*
Docket No. 20240025-EI

Dear Mr. Teitzman:

Attached for filing on behalf of the Florida Retail Federation in the above-referenced docket is the Direct Testimony and Exhibits of Steve W. Chriss [SWC-1 through SWC-7]. This filing is in compliance with the Order Establishing Procedure dated April 11, 2024.

Thank you for your assistance in this matter. Please feel free to call me at (850)933-2016 should you have any questions concerning this filing.

Cordially,

Robert Scheffel Wright

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: PETITION FOR RATE INCREASE)
BY DUKE ENERGY FLORIDA, LLC) **DOCKET NO. 20240025-EI**

DIRECT TESTIMONY AND EXHIBITS OF
STEVE W. CHRISS
ON BEHALF OF
FLORIDA RETAIL FEDERATION

JUNE 11, 2024

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1 **Introduction**

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

4 A. My name is Steve W. Chriss. My business address is 2608 SE J St.,
5 Bentonville, AR 72716-0550. I am employed by Walmart Inc. (“Walmart”) as
6 Senior Director, Utility Partnerships.

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

8 A. I am testifying on behalf of the Florida Retail Federation (“FRF”), a statewide trade
9 association of more than 8,000 of Florida’s retailers, many of whom are retail
10 customers of Duke Energy Florida, LLC (“DEF” or “Company”). As an example,
11 Walmart has 93 stores and clubs, one distribution center, and related facilities that
12 take service from DEF.

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

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

1 Director, Energy and Strategy Analysis in October 2016 and the position was re-
2 titled in October 2018. I was promoted to my current position in July 2023. My
3 Witness Qualifications Statement is attached as Exhibit SWC-1.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
5 **FLORIDA PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

6 A. Yes. I testified in Docket Nos. 20110138-EI, 20120015-EI, 20130140-EI,
7 20130040-EI, 20140002-EI, 20160021-EI, 20160186-EI, 20190061-EI, 20200067-
8 EI, 20200069-EI, 20200070-EI, 20200071, 20200092, 20200176, 20210015,
9 20240012-EG, 20240013-EG, 20240014-EG, 20240015-EG, 20240016-EG,
10 20240017-EG, and 20240026-EI.

11 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**
12 **STATE REGULATORY COMMISSIONS?**

13 A. Yes. I have submitted testimony in over 270 proceedings before 42 other utility
14 regulatory commissions. I have also submitted testimony before legislative
15 committees in six states. My testimony has addressed topics including, but not
16 limited to, cost of service and rate design, return on equity, revenue requirements,
17 ratemaking policy, net metering, community solar, large customer renewable
18 programs, qualifying facility rates, telecommunications deregulation, resource
19 certification, energy efficiency/demand side management, fuel cost adjustment
20 mechanisms, decoupling, and the collection of cash earnings on construction work
21 in progress.

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

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

3 **Q. GENERALLY, WHY ARE UTILITY CUSTOMERS, INCLUDING**
4 **RETAILERS AND OTHER COMMERCIAL CUSTOMERS, CONCERNED**
5 **ABOUT DUKE ENERGY FLORIDA’S (DEF) PROPOSED RATE**
6 **INCREASE?**

7 A. Electricity represents a significant portion of retailers’ operating costs. When rates
8 increase, that increase in cost to retailers puts pressure on consumer prices and on
9 the other expenses required by a business to operate, which impacts retailers’
10 customers and employees. Rate increases also directly impact retailers’ customers,
11 who are DEF’s residential and small business customers. Given current economic
12 conditions, a rate increase is a serious concern for retailers and their customers, and
13 the Commission should consider these impacts thoroughly and carefully in ensuring
14 that any increase in DEF’s rates is only the minimum amount necessary for the
15 utility to provide adequate and reliable service.

16

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

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

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

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

3 **A. FRF’s recommendations to the Commission are as follows:**

4 1) The Commission should thoroughly and carefully consider the impact on
5 customers in examining the requested ROE, in addition to all other facets of
6 this case, to ensure that any increase in the Company's rates reflects the
7 minimum amount necessary to compensate the Company for adequate and
8 reliable service, while also providing DEF an opportunity to earn a reasonable
9 return for its shareholders. Specifically, the Commission should closely
10 examine DEF's proposed revenue requirement increase and the associated ROE
11 in light of:

- 12 a. The customer impact of the resulting revenue requirement increases;
- 13 b. The use of a future test year, which reduces regulatory lag by allowing the
14 utility to include projected costs in its rates at the time they will be in effect;
- 15 c. The high degree of revenue certainty realized by DEF through recovery of
16 a substantial proportion of total retail revenues through cost recovery
17 clauses;
- 18 d. Recent rate case ROEs approved by the Commission; and
- 19 e. Recent rate case ROEs approved by other state regulatory commissions
20 nationwide.

21 2) For the purposes of this docket, at this time FRF does not take a position on the
22 proposed cost of service study.

23 3) For the purposes of this docket, FRF does not oppose the Company’s proposed

1 revenue allocation methodology.

2 4) FRF supports the Company's proposed expansion of the Clean Energy
3 Connection ("CEC") program.

4 5) FRF does not oppose Commission approval of the proposed Make Ready Credit
5 ("MRC") program.

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

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

11

12 **Return on Equity**

13 **Q. WHAT IS YOUR UNDERSTANDING OF DEF'S PROPOSED REVENUE**
14 **REQUIREMENT INCREASE IN THIS DOCKET?**

15 A. My understanding is that DEF is requesting a general base rate increase for the 2025
16 test year of \$593 million to be effective January 1, 2025, and additional subsequent
17 year adjustments of \$98 million to be effective January 1, 2026 and \$129 million
18 to be effective January 1, 2027. See Direct Testimony of Melissa Seixas, page 21,
19 line 2 to line 7. In total, DEF is requesting a cumulative increase in its base rates
20 over three years of \$820 million per year. In total, DEF is asking its customers to
21 pay more than \$2.1 billion in additional base rate revenues over the 2025-2027
22 period.

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

2 A. The Company proposes an ROE of 11.15 percent, based on a range of 10.4 percent
3 to 11.4 percent, or 10.5 percent to 11.5 percent, adjusting for the impact of common
4 equity flotation costs. See Direct Testimony of Adrien McKenzie, page 3, line 12
5 to line 20.

6 **Q. IS DEF’S PROPOSED ROE HIGHER THAN THEIR LAST APPROVED
7 MIDPOINT ROE?**

8 A. Yes. The Company’s proposed ROE represents an increase of 130 basis points
9 from DEF's last approved midpoint ROE of 9.85 percent.¹ The proposed ROE is
10 also 105 basis points higher than the ROE trigger result of 10.1 percent approved
11 in 2022.²

12 **Q. IS FRF CONCERNED ABOUT THE REASONABLENESS OF THE
13 COMPANY’S PROPOSED ROE?**

14 A. Yes, especially when viewed in light of:
15 1) The customer impact of the resulting revenue requirement increases;
16 2) The use of a future test year, which reduces regulatory lag by allowing the
17 utility to include projected costs in its rates at the time they will be in effect;
18 3) The high degree of revenue certainty that DEF realizes through the use of
19 pass-through type cost recover clauses;

¹ *In re: Petition for limited proceeding to approve 2021 settlement agreement, including general base rate increases, by Duke Energy Florida, LLC, Docket No. 20210016-EI, Order No. PSC-2021-0202-AS-EI, Final Order Approving 2021 Settlement Agreement (issued June 4, 2021).*

² *In re: Petition for limited proceeding to implement return on equity trigger provision of 2021 settlement agreement, by Duke Energy Florida, LLC, Docket No. 20220143-EI, Order No. PSC-2022-0357-FOF-EI, Order Implementing Duke Energy Florida, LLC’s Return on Equity Trigger (issued October 21, 2022).*

- 1 4) Recent rate case ROEs approved by the Commission; and
2 5) Recent rate case ROEs approved by other state regulatory commissions
3 nationwide.

4 **Q. WHAT IS YOUR CONCERN WITH DEF'S ROE RELATIVE TO ITS USE**
5 **OF COST RECOVERY CLAUSES?**

6 A. Through the use of cost recovery clauses and charges, such as the Fuel and
7 Purchased Power Cost Recovery Clause, the Environmental Cost Recovery Clause,
8 the Energy Conservation Cost Recovery Clause, and other such clauses, DEF
9 realizes great revenue certainty. For example, DEF's March 2024 Earnings
10 Surveillance Report shows that DEF recovered approximately 61 percent of its total
11 retail operating revenues through cost recovery clauses. This great degree of
12 revenue certainty demonstrates correspondingly great reductions in risk, which
13 should be reflected in the ROE approved for the Company.

14
15 *Customer Impact*

16 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT FOR THE 2025**
17 **TEST YEAR OF DEF'S PROPOSED INCREASE IN ROE FROM THE**
18 **COMPANY'S LAST APPROVED MIDPOINT ROE OF 9.85 PERCENT?**

19 A. The proposed increase in ROE from DEF's last approved midpoint ROE has an
20 annual revenue requirement impact on the Company's rates of approximately
21 \$163.5 million for 2025. This constitutes about 27.6 percent of the Company's
22 overall increase request for the 2025 test year. See Exhibit SWC-2. For the 2026
23 test year, the increase has a revenue requirement impact of approximately \$171.2

1 million, or 28.8 percent of the Company's request for the 2026 test year. *See*
2 Exhibit SWC-3. Finally, for the 2027 test year, the increase has a revenue
3 requirement impact of approximately \$177.8 million, or 30 percent of the
4 Company's request for the 2027 test year. *See* Exhibit SWC-4.

5 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT FOR THE 2025**
6 **TEST YEAR OF DEF'S PROPOSED INCREASE IN ROE FROM THE**
7 **COMPANY'S ROE TRIGGER MIDPOINT ROE OF 10.1 PERCENT?**

8 A. When the approved ROE trigger midpoint is considered, the annual revenue
9 requirement impact on DEF's rates is approximately \$132.1 million for 2025. This
10 constitutes about 22.3 percent of the Company's overall increase request for the
11 2025 test year. *See* Exhibit SWC-5.

12

13 ***Future Test Year***

14 **Q. HAS THE COMMISSION RECOGNIZED THAT THE USE OF A FUTURE**
15 **TEST YEAR IMPACTS THE UTILITY'S EXPOSURE TO REGULATORY**
16 **LAG?**

17 A. Yes. The use of a projected test year reduces the utility's financial risk due to
18 regulatory lag because, as the Commission has previously stated, "the main
19 advantage of a projected test year is that it includes all information related to rate
20 base, NOI, and capital structure for the time new rates will be in effect."³ As such,

³ *In re: Request for rate increase by Gulf Power Company*, Docket No. 010949-EI, Order No. PSC-02-0787-FOF-EI, Order Granting in Part and Denying in Part Gulf Power Company's Petition for Rate Increase (issued June 10, 2002), page 9.

1 the Commission should carefully consider the level of ROE required in light of the
2 Company's reduced exposure to regulatory lag.

3

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

5 **Q. IS DEF'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN ROEs**
6 **RECENTLY APPROVED BY THE COMMISSION?**

7 A. Yes. In 2021, in addition to the DEF ROE discussed above, the Commission
8 approved Tampa Electric Company's 2021 Settlement Agreement for its base rate
9 case in Docket 20210034-EI, which included approval of an ROE midpoint of 9.95
10 percent.⁴ Additionally, the Commission approved Florida Power & Light
11 Company's 2021 Settlement Agreement of its base rate case in Docket 20210015-
12 EI, which included approval of an ROE midpoint of 10.6 percent.⁵

13 As such, the Company's proposed 11.15 percent ROE midpoint is excessive
14 as compared to recent Commission actions regarding ROE.

⁴ *In re: Petition for Rate Increase by Tampa Electric Company*, Docket No. 20210034-EI, Order No. PSC-2021-0423-S-EI, Final Order Approving Stipulation and Settlement Agreement Between Tampa Electric Company and All Intervenors (issued June 4, 2021).

⁵ *In re: Petition for rate increase by Florida Power & Light Company*, Docket No. 20210015-EI, Order No. PSC-2021-0446-S-EI Approving 2021 Stipulation and Settlement Agreement (issued December 2, 2021).

1 *ROEs Approved for Other Duke Energy Operating Companies*

2 Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER
3 THAN THE ROEs RECENTLY APPROVED FOR OTHER DUKE
4 OPERATING COMPANIES?

5 A. Yes. Since 2021 the following ROEs have been authorized for other Duke Energy
6 operating companies.

7 • Duke Energy Carolinas was authorized an ROE of 9.6 percent in their North
8 Carolina rate case that concluded in 2021 (Docket E-7, Sub 1214). Duke
9 Energy Carolinas was subsequently authorized an ROE of 10.1 percent in their
10 North Carolina rate case that concluded in 2023 (Docket E-7, Sub 1300).

11 • Duke Energy Progress was authorized an ROE of 9.6 percent in their North
12 Carolina rate case that concluded in 2021 (Docket E-2, Sub 1219). Duke
13 Energy Progress was subsequently authorized an ROE of 9.8 percent in their
14 North Carolina rate case that concluded in 2023 (Docket E-2, Sub 1300).

15 • Duke Energy Ohio was authorized an ROE of 9.5 percent in their Ohio rate case
16 that concluded in 2022 (Docket 21-0887-EL-AIR).

17 • Duke Energy Progress was authorized an ROE of 9.6 percent in their South
18 Carolina rate case that concluded in 2022 (Docket 2022-254-E).

19 • Duke Energy Kentucky was authorized an ROE of 9.75 percent in their
20 Kentucky rate case that concluded in 2023 (Docket 2022-00372).

21 As such, the Company's proposed 11.15 percent ROE midpoint is excessive
22 as compared to recent ROEs authorized for the other Duke Energy operating

1 companies.

2

3 *National Utility Industry ROE Trends*

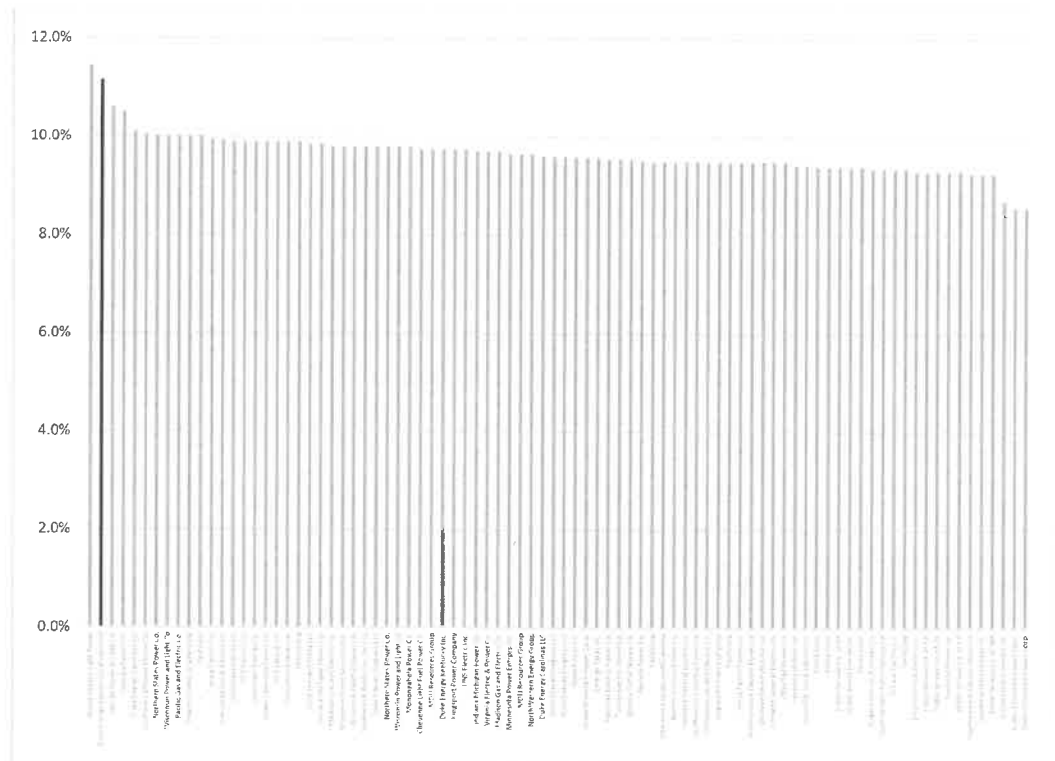
4 **Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER**
5 **THAN THE ROEs APPROVED BY OTHER UTILITY REGULATORY**
6 **COMMISSIONS IN 2021, 2022, 2023, AND SO FAR IN 2024?**

7 A. Yes. According to data from S&P Global Market Intelligence ("S&P Global"), a
8 financial news and reporting company, the average of the 118 reported electric
9 utility rate case ROEs authorized by regulatory commissions for investor-owned
10 utilities in 2021, 2022, 2023, and so far in 2024, is 9.50 percent. The range of
11 reported authorized ROEs for the period is 7.36 percent to 11.45 percent, and the
12 median authorized ROE is 9.50 percent. The average and median values are
13 significantly below the Company's proposed ROE of 11.15 percent. As such, DEF's
14 proposed 11.15 percent midpoint ROE is excessive when compared to broader
15 electric industry trends. *See Exhibit SWC-6.*

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

21 A. In the group reported by S&P Global, the average ROE for vertically integrated
22 utilities authorized from 2021 through present is 9.62 percent. The average ROE
23 authorized for vertically integrated utilities in 2021 was 9.54 percent; in 2022, it

1 was 9.60 percent; in 2023, it was 9.71 percent; and thus far in 2024, it is 9.72
 2 percent. *Id.* As such, the Company's proposed 11.15 percent ROE is excessive in
 3 light of broader electric industry trends and, in fact, as shown in Figure 1, would
 4 be the second highest approved ROE (out of 84) for a vertically integrated utility
 5 from 2021 to present, if approved by the Commission.



6 **Figure 1. DEF's Proposed ROE Versus Authorized ROEs for Vertically**
 7 **Integrated Utilities, 2021 to present. Source: Exhibit SWC-6.**

8 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT WERE THE**
 9 **COMMISSION TO APPROVE AN ROE FOR DEF EQUIVALENT TO 9.72**
 10 **PERCENT, THE AVERAGE AUTHORIZED ROE NATIONWIDE FOR**
 11 **VERTICALLY INTEGRATED UTILITIES IN 2024?**

12 **A.** If the Commission were to approve an ROE for DEF of 9.72 percent, versus the
 13 Company's proposal of 11.15 percent, it would result in a reduction in the
 14
 15

1 Company's proposed revenue requirement of \$180.3 million, or 30.4 percent. *See*
2 Exhibit SWC-7.

3 **Q. IS FRF RECOMMENDING THAT THE COMMISSION BE BOUND BY**
4 **ROEs AUTHORIZED BY OTHER STATE REGULATORY**
5 **COMMISSIONS?**

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

11 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION IN**
12 **REGARD TO THE COMPANY'S PROPOSED ROE?**

13 A. The Commission should thoroughly and carefully consider the impact on customers
14 in examining the requested ROE, in addition to all other facets of this case, to ensure
15 that any increase in the Company's rates reflects the minimum amount necessary to
16 compensate the Company for adequate and reliable service, while also providing
17 DEF an opportunity to earn a reasonable return for its shareholders.

18

19 **Cost of Service and Revenue Allocation**

20 **Q. GENERALLY, WHAT IS FRF'S POSITION ON SETTING RATES BASED**
21 **ON THE UTILITY'S COST OF SERVICE?**

22 A. FRF advocates that rates be set based on the utility's cost of service for each rate
23 class. This produces equitable rates that reflect cost causation, sends proper price

1 signals, and minimizes price distortions.

2 **Q. WHAT IS FRF'S UNDERSTANDING OF THE COMPANY'S PROPOSED**
3 **COST OF SERVICE STUDY IN THIS DOCKET?**

4 A. It is FRF's understanding that the Company's proposed cost of service study in this
5 docket has been filed in accordance with the 2021 Settlement Agreement ("2021
6 Agreement") approved by the Commission in Order No. PSC-2021-0202A-AS-EI.
7 Neither FRF nor Walmart were parties to the settlement, and it is important to note
8 that the settlement was the result of negotiation between the parties with give and
9 take across the breadth of issues, and signing is not necessarily an endorsement of
10 any individual provision of a settlement. My understanding is that the 2021
11 Agreement states the Company will rely on the 12 CP and 25 percent AD
12 methodology for production cost allocation, but no signing party waived their right
13 to advocate for alternative production cost allocation methodologies in this docket.
14 *See* 2021 Agreement, Appendix A, page 8.

15 **Q. WHAT IS FRF'S POSITION ON THE COMPANY'S PROPOSED COST OF**
16 **SERVICE STUDY?**

17 A. For the purposes of this docket, at this time FRF does not take a position on the
18 proposed cost of service study.

19 **Q. HOW DOES THE COMPANY REPRESENT WHETHER RATES FOR A**
20 **CUSTOMER CLASS ACCURATELY REFLECT THE UNDERLYING**
21 **COST OF SERVICE?**

22 A. The Company represents this relationship in its cost of service study results through
23 a comparison of class-specific rates of return. *See* Schedule E-1. These rates of

1 return can be converted into a rate of return index (“RRI”), which is an indexed
2 measure of the relationship of the rate of return for an individual rate class to the
3 total system rate of return. An RRI greater than 1.0 means that the rate class is
4 paying rates in excess of the costs incurred to serve that class, and an RRI less than
5 1.0 means that the rate class is paying rates less than the costs incurred to serve that
6 class. As such, those rate classes with an RRI greater than 1.0 shoulder some of
7 the revenue responsibility for the classes with an RRI less than 1.0.

8 **Q. HAS THE COMPANY CALCULATED A RRI FOR EACH CUSTOMER**
9 **CLASS BASED ON DEF’S COST OF SERVICE RESULTS AT PRESENT**
10 **RATES?**

11 A. Yes, as shown in Table 1 below.

**Table 1. Rate of Return Index, DEF Proposed Cost of Service Study
Results, Present Rates.**

Customer Class	Rate of Return (%)	RRI
RS	5.11	1.05
GS-1	7.00	1.44
GS-2	2.98	0.61
GSD, SS-1	4.21	0.87
CS, SS-3, IS, SS-2	2.63	0.54
LS – Energy	-1.30	(0.27)
LS – Facilities	4.53	0.93
EV Solution	12.08	2.49
Total Company		1.00

Sources: Schedule E-1, page 4.

12
13 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S REVENUE**
14 **ALLOCATION PROPOSAL?**

15 A. My general understanding is that the Company proposes to limit the increase of
16 each class to no more than 1.5 times the average system increase, and no class shall

1 receive a decrease if there is an overall revenue requirement increase. *See* Direct
2 Testimony of Marcia J. Olivier, page 42, line 1 to line 4. The resulting RRI per the
3 Company’s proposed revenue requirements and revenue allocation for 2025, 2026,
4 and 2027 are shown in Table 2 below.

Customer Class	RRI, PTY 2025	RRI, PTY 2026	RRI, PTY 2027
RS	1.01	1.01	1.01
GS-1	1.01	1.01	1.01
GS-2	0.93	0.94	0.97
GSD, SS-1	1.01	1.01	1.01
CS.SS-3, IS, SS-2	0.86	0.88	0.91
LS – Energy	0.62	0.63	0.64
LS – Facilities	1.00	1.00	1.00
EV Solution	1.00	1.00	1.00
Total Company	1.00	1.00	1.00

Sources: Schedule E-1, page 2 to page 4.

5

6 **Q. WHAT IS FRF’S RECOMMENDATION TO THE COMMISSION ON THIS**
7 **ISSUE?**

8 A. For the purposes of this docket, FRF does not oppose the Company’s proposed
9 revenue allocation methodology.

10

11 **Clean Energy Connection Program Expansion**

12 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S PROPOSAL**
13 **TO EXPAND THE CEC PROGRAM?**

14 A. My understanding is that the Company proposes to expand the CEC program to add
15 five solar sites projected to go into service during the 2025, 2026, and 2027 test
16 years. The total capacity of the five sites is approximately 375 MW. *See* Direct

1 Testimony of Benjamin M. H. Borsch, page 19, line 17 to line 20.

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED**
3 **ALLOCATION OF PROGRAM CAPACITY?**

4 A. My understanding is that the Company proposes to allocate eight percent of the
5 expanded capacity to residential and small business customers, 64 percent to
6 commercial and industrial customers, 18 percent to local governments, and 10
7 percent to higher education facilities. Within that allocation, the Company
8 proposes to allocate 3.5 percent to low-income customers. *See* Direct Testimony
9 of Marcia J. Olivier, page 21, line 15 to page 22, line 8.

10 **Q. DOES THE COMPANY PROPOSE TO INTEGRATE THE ADDITIONAL**
11 **CEC CAPACITY INTO THE EXISTING PROGRAM STRUCTURE?**

12 A. Yes. *Id.*, page 22, line 18 to line 22.

13 **Q. WHAT IS FRF'S RECOMMENDATION TO THE COMMISSION ON THIS**
14 **ISSUE?**

15 A. FRF supports the Company's proposed expansion of the CEC program as an avenue
16 to support the achievement of renewable energy goals that its members may have.

17

18 **Make Ready Credit Program**

19 **Q. WHAT IS YOUR GENERAL UNDERSTANDING OF THE COMPANY'S**
20 **PROPOSED MAKE READY CREDIT (MRC) PROGRAM?**

21 A. My understanding is the Company proposes the MRC program to provide an
22 incentive, as a credit on a customer bill or a payment to a contractor, for the
23 installation of the customer-side infrastructure required to service EV charging

1 hardware. *See* Direct Testimony of Timothy J. Duff, page 12, line 9 to line 14.

2 **Q. WHAT ARE THE COMPANY'S PROPOSED ELIGIBILITY**
3 **REQUIREMENTS?**

4 A. The Company proposes that residential and non-residential customers be eligible,
5 as well as pre-approved homebuilders constructing homes served by DEF's
6 distribution system. *Id.*, page 12, line 17 to line 22.

7 **Q. WHAT PROCESS DOES THE COMPANY PROPOSE FOR NON-**
8 **RESIDENTIAL CUSTOMER PARTICIPANTS?**

9 A. The Company proposes that a participating customer file an application which
10 includes invoices for the make ready infrastructure, a schematic diagram of the
11 installation, a copy of the approved permit from the municipal or local permitting
12 authority, and a completed customer usage form. The Company proposes that the
13 application be submitted within 120 days following the later of the date on the most
14 recent invoice included in the application or the date listed on the approved permit.
15 *Id.*, page 15, line 21 to page 16, line 12.

16 **Q. DOES THE COMPANY PRECLUDE CREDITING OF COSTS SUBJECT**
17 **TO REIMBURSEMENT FROM THIRD-PARTY FUNDING SOURCES?**

18 A. Yes. *Id.*, line 14 to line 16.

19 **Q. DOES THE COMPANY PROPOSE CAPS TO THE MRC PROGRAM**
20 **CREDITS?**

21 A. Yes. The Company proposes to limit the per charger credit to the lesser of the four-
22 year base revenue calculation from the new service or the customer's cost of

1 installing make ready infrastructure. *Id.*, page 20, line 6 to line 9.

2 **Q. WHAT IS FRF'S RECOMMENDATION TO THE COMMISSION ON THIS**
3 **ISSUE?**

4 A. FRF does not oppose Commission approval of the proposed MRC program.

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

6 A. Yes.

Steve W. Chriss

Walmart Inc.

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

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Senior Director, Utility Partnerships (July 2023 – Present)

Director, Energy Services (October 2018 – July 2023)

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

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

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

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001

Louisiana State University

M.S., Agricultural Economics

1997-1998

University of Florida

Graduate Coursework, Agricultural Education
and Communication

1997

Texas A&M University

B.S., Agricultural Development

B.S., Horticulture

PRESENT MEMBERSHIPS

Arkansas Advanced Energy Foundation, Board

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

South Carolina Electricity Market Reforms Measures Study Committee

The Ray, Advisory Council

PAST MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Clean Energy Buyers Alliance, Advisory Board

Southwest Power Pool, Corporate Governance Committee

TESTIMONY BEFORE REGULATORY COMMISSIONS

2024

Florida Docket No. 20240026-EI: In Re: Petition for Rate Increase by Tampa Electric Company.

Florida Docket No. 20240012-EG: Commission Review of Numeric Conservation Goals (Florida Power & Light Company).

Florida Docket No. 20240013-EG: Commission Review of Numeric Conservation Goals (Duke Energy Florida, LLC).

Florida Docket No. 20240014-EG: Commission Review of Numeric Conservation Goals (Tampa Electric Company).

Florida Docket No. 20240015-EG: Commission Review of Numeric Conservation Goals (Florida Public Utilities Company).

Florida Docket No. 20240016-EG: Commission Review of Numeric Conservation Goals (JEA).

Florida Docket No. 20240017-EG: Commission Review of Numeric Conservation Goals (Orlando Utilities Commission).

California Application No. 23-05-010: Application of Southern California Edison Company (U338E) for Authority to Increase Its Authorized Revenues for Electric Service in 2025, Among Other Things, and to Reflect that Increase in Rates.

California Application No. 21-06-021: Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023 and Establish a New Balancing Account for Electric Distribution Capacity Additions and New Electric Distribution Extension Work Activities.

2023

Ohio Case No. 22-0704-EL-UNS: In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Approval of Phase Two of their Distributed Grid Modernization Plan.

Indiana Cause No. 45911: Petition of Indianapolis Power & Light Company d/b/a AES Indiana for Authority to Increase Rates and Charges for Electric Utility Service, and for Approval of Related Relief, Including (1) Revised Depreciation Rates, (2) Accounting Relief, Including Deferrals and Amortizations, (3) Inclusion of Capital Investments, (4) Rate Adjustment Mechanism Proposals, Including New Economic Development Rider, (5) Remote Disconnect/Reconnect Process, and (6) New Schedules of Rates, Rules, and Regulations for Service.

Nevada Docket No. 23-06007: Application of Nevada Power Company d/b/a NV Energy for Authority to Adjust its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Kansas Docket No. 23-EKCE-775-RTS: In the Matter of the Application of Evergy Kansas Metro, Inc., Evergy Kansas South, Inc. and Evergy Kansas Central, Inc. to make Certain Changes in their Charges for Electric Service Pursuant to K.S.A. 66-117.

North Carolina Docket No. E-7, Sub 1276: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina and Performance-Based Regulation.

Virginia Case No. PUR-2023-00002: Application of Appalachian Power Company for a 2023 Triennial Review of its Base Rates, Terms, and Conditions Pursuant to §56-585.1 of the Code of Virginia.

New Mexico Case No. 22-00270-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. 595.

Arizona Docket No. E-01345A-22-0144: In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of the Utility Property of the Company for Ratemaking Purposes, to Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules to Develop Such Return.

Oregon Docket UE 416: In the Matter of Portland General Electric Company, Request for a General Rate Revision; and 2024 Annual Power Cost Update.

Arizona Docket No. E-04204A-22-0251: In the Matter of the Application of UNS Electric, Inc. 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 UNS Electric, Inc. Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

Ohio Case No. 23-23-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan.

North Carolina Docket No. E-2, Sub 1300: In the Matter of Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina and Performance-Based Regulation.

Kentucky Case No. 2022-00372: In the Matter of Electronic Application of Duke Energy Kentucky, Inc. for (1) An Adjustment of Electric Rates; (2) Approval of New Tariffs; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; and (4) All Other Required Approvals and Relief.

Missouri Docket No. ER-2022-0337: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service.

New Mexico Case No. 22-00286-UT: In the Matter of Southwestern Public Service Company's Application for: (1) Revision of its Retail Rates Under Advice Notice No. 312; (2) Authority to Abandon the Plant X Unit 1, Plant X Unit 2, and Cunningham Unit 1 Generating Stations and Amend the Abandonment Date of the Tolk Generating Station; and (3) Other Associated Relief.

Arizona Docket No. E-01933A-22-0107: 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.

New Mexico Case No. 22-00058-UT: In the Matter of the Public Service Company of New Mexico's Application for Authorization to Implement Grid Modernization Components that Include Advanced Metering Infrastructure and Application to Recover the Associated Costs Through a Rider, Issuance of Related Accounting Orders, and Other Associated Relief.

2022

Maine Docket No. 2022-00255: Versant Power Request for Approval of Rate Change Pursuant to 35-A M.R.S. § 307.

Maine Docket No. 2022-00152: Central Maine Power Company Request for Approval of Distribution Rate Increase and Rate Design Changes Pursuant to 35-A M.R.S. § 307.

Georgia Docket No. 44280: In Re: Georgia Power's 2022 Rate Case.

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

Nevada Docket No. 22-06014: 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.

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

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

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

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

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

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

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

2021

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

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

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

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

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

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

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

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

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

2020

Arizona Docket No. E-01345A-19-0236: In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of Ratemaking Purposes, to Fix a Just and Reasonable Return Thereon and to Approve Rate Schedules Designed to Develop Such Return.

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

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

Nevada Docket No. 20-05003: Application of Nevada Power Company d/b/a NV Energy Filed Under Advice Letter No. 504 to Establish Customer Price Stability Tariff Schedule No. CPST (the "Program") to Assist Certain Qualifying Customers During the COVID-19 Pandemic and Economic Downturn, and to Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

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

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

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

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

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

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

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

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

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

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

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

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

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

2019

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2018

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2017

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

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

Oklahoma Cause No. PUD 201700267: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Wind Catcher Energy Connection Project; A Determination There is Need for the Project; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the Project; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

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

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

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

Kentucky Case No. 2017-00179: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2017 Environmental Compliance

Plan; (3) an Order Approving its Tariffs and Riders; (4) an Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) an Order Granting All Other Requested Relief.

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

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

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

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

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

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

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

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

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

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

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

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2015

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2014

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2013

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2011

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

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

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

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

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

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

Public Utilities Commission of Nevada Docket No. 11-06006: In the Matter of the Application of Nevada Power Company, filed pursuant to NRS 704.110(3) for authority to increase its annual revenue requirement

for general rates charged to all classes of customers to recover the costs of constructing the Harry Allen Combined Cycle plant and other generating, transmission, and distribution plant additions, to reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

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

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

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

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

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

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

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

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

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

2010

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

2024

Regarding Missouri HB 2574: Written testimony submitted to the Missouri House Committee on Utilities, April 3, 2024.

Regarding Wisconsin AB 258: Testimony before the Wisconsin Assembly Committee on Energy and Utilities, February 14, 2024.

2023

Regarding Oklahoma IS-23-032, Discussion of Performance Based Rates and Right of First Refusal of Electric Companies, October 23, 2023.

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, Decarbonize Utilities Through Customer Action, CEBA Connect: 2024 Spring Summit, Denver, Colorado, May 24, 2024.

Panelist, Procuring Clean Energy Through Utility Green Tariff Programs, VERGE, San Jose, California, October 25, 2023.

Presenter, Walmart Energy Transformation, Edison Electric Institute National Key Accounts Workshop, Columbus, Ohio, October 9, 2023.

Presenter, Energy Transformation, The Energy Council 2023 Annual Meeting, Little Rock, Arkansas, September 15, 2023.

Presenter, Walmart's Energy and Transportation Transformation, Louisiana Clean Fuels Summit, Baton Rouge, Louisiana, April 19, 2023.

Panelist, How Federal Funding is Changing the EV Charging Landscape for Corporate Customers, Edison Electric Institute National Key Accounts Workshop, Miami, Florida, March 22, 2023.

Panelist, Green Tariffs: Benefits and Opportunities for Energy Customers and Utilities, VERGE, San Jose, California, October 26, 2022.

Panelist, Leveraging Electric Company Partnerships to Support Corporate Customer Business Strategies, Edison Electric Institute National Key Accounts Workshop, Indianapolis, Indiana, October 24, 2022.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Panelist, 40th 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.

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

Panelist, Customer Panel, Virginia State Bar 29th National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

Impact of DEF's Proposed Increase in Return on Equity (\$000) vs. Originally Approved, PTY 2025

Currently Authorized ROE (9.85%)					
		Capital Component	Ratio	Cost	Weighted Cost
(1)	Schedule D-1a	Common Equity	45.61%	9.85%	4.49%
(2)	Schedule D-1a	Long Term Debt	40.68%	4.49%	1.83%
(3)	Schedule D-1a	Short Term Debt	-0.20%	3.25%	-0.01%
(4)	Schedule D-1a	Customer Deposits Active	0.76%	2.61%	0.02%
(5)	Schedule D-1a	Customer Deposits Inactive	0.01%	0.00%	0.00%
(6)	Schedule D-1a	Investment Tax Credits	1.00%	8.01%	0.08%
(7)	Schedule D-1a	Deferred Income Taxes	12.13%	0.00%	0.00%
(8)			100%		
(9)	Σ (1) ... (7)	WACC at Currently Authorized ROE (9.85%)			6.41%
(10)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(11)	(9) x (10)	Net Operating Income, Authorized ROE (\$000)		\$	1,316,771
Proposed ROE (11.15%)					
		Capital Component	Ratio	Cost	Weighted Cost
(12)		Common Equity	45.61%	11.15%	5.09%
(13)		Long Term Debt	40.68%	4.49%	1.83%
(14)		Short Term Debt	-0.20%	3.25%	-0.01%
(15)		Customer Deposits Active	0.76%	2.61%	0.02%
(16)		Customer Deposits Inactive	0.01%	0.00%	0.00%
(17)		Investment Tax Credits	1.00%	8.01%	0.08%
(18)		Deferred Income Taxes	12.13%	0.00%	0.00%
(19)			100%		
(20)	Σ (12) ... (18)	WACC at Proposed ROE (11.50%)			7.01%
(21)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(22)	(8) x (9)	Net Operating Income, Proposed ROE (\$000)		\$	1,438,525
Increase in Revenue Requirement from Increase in ROE					
(11)	(10) - (5)	Difference in Net Operating Income (\$000)		\$	121,754
(12)	Schedule A-1	Net Operating Income Multiplier			1.34330
(13)	(11) / (12E)	Increase Related to Increase in ROE		\$	163,552
(14)	Schedule A-1	Proposed Revenue Requirement Increase (\$000)		\$	593,446
(15)	(13)/(14)	Percent Increase Related to Increase in ROE			27.6%

Impact of DEF's Proposed Increase in Return on Equity (\$000) vs. Originally Approved, PTY 2026

Currently Authorized ROE (9.85%)					
		Capital Component	Ratio	Cost	Weighted Cost
(1)	Schedule D-1a	Common Equity	45.73%	9.85%	4.50%
(2)	Schedule D-1a	Long Term Debt	40.58%	4.52%	1.83%
(3)	Schedule D-1a	Short Term Debt	-0.10%	3.20%	0.00%
(4)	Schedule D-1a	Customer Deposits Active	0.71%	2.61%	0.02%
(5)	Schedule D-1a	Customer Deposits Inactive	0.01%	0.00%	0.00%
(6)	Schedule D-1a	Investment Tax Credits	0.93%	8.03%	0.07%
(7)	Schedule D-1a	Deferred Income Taxes	12.04%	0.00%	0.00%
(8)			100%		
(9)	Σ (1) ... (7)	WACC at Currently Authorized ROE (9.85%)			6.43%
(10)	Schedule A-1	Total Retail Rate Base (\$000)		\$	21,428,995
(11)	(9) x (10)	Net Operating Income, Authorized ROE (\$000)		\$	1,377,591
Proposed ROE (11.15%)					
		Capital Component	Ratio	Cost	Weighted Cost
(12)		Common Equity	45.73%	11.15%	5.10%
(13)		Long Term Debt	40.58%	4.52%	1.83%
(14)		Short Term Debt	-0.10%	3.20%	0.00%
(15)		Customer Deposits Active	0.71%	2.61%	0.02%
(16)		Customer Deposits Inactive	0.01%	0.00%	0.00%
(17)		Investment Tax Credits	0.93%	8.03%	0.07%
(18)		Deferred Income Taxes	12.04%	0.00%	0.00%
(19)			100%		
(20)	Σ (12) ... (18)	WACC at Proposed ROE (11.50%)			7.02%
(21)	Schedule A-1	Total Retail Rate Base (\$000)		\$	21,428,995
(22)	(8) x (9)	Net Operating Income, Proposed ROE (\$000)		\$	1,504,984
Increase in Revenue Requirement from Increase in ROE					
(11)	(10) - (5)	Difference in Net Operating Income (\$000)		\$	127,393
(12)	Schedule A-1	Net Operating Income Multiplier			1,34360
(13)	(11) / (12E)	Increase Related to Increase in ROE		\$	171,166
(14)	Schedule A-1	Proposed Revenue Requirement Increase (\$000)		\$	593,446
(15)	(13)/(14)	Percent Increase Related to Increase in ROE			28.8%

Impact of DEF's Proposed Increase in Return on Equity (\$000) vs. Originally Approved, PTY 2027

Currently Authorized ROE (9.85%)					
		Capital Component	Ratio	Cost	Weighted Cost
(1)	Schedule D-1a	Common Equity	45.83%	9.85%	4.51%
(2)	Schedule D-1a	Long Term Debt	39.57%	4.63%	1.83%
(3)	Schedule D-1a	Short Term Debt	1.10%	3.20%	0.04%
(4)	Schedule D-1a	Customer Deposits Active	0.67%	2.61%	0.02%
(5)	Schedule D-1a	Customer Deposits Inactive	0.01%	0.00%	0.00%
(6)	Schedule D-1a	Investment Tax Credits	0.89%	8.13%	0.07%
(7)	Schedule D-1a	Deferred Income Taxes	11.94%	0.00%	0.00%
(8)			100%		
(9)	Σ (1) ... (7)	WACC at Currently Authorized ROE (9.85%)			6.47%
(10)	Schedule A-1	Total Retail Rate Base (\$000)		\$	22,198,157
(11)	(9) x (10)	Net Operating Income, Authorized ROE (\$000)		\$	1,436,529
Proposed ROE (11.15%)					
		Capital Component	Ratio	Cost	Weighted Cost
(12)		Common Equity	45.83%	11.15%	5.11%
(13)		Long Term Debt	39.57%	4.63%	1.83%
(14)		Short Term Debt	1.10%	3.20%	0.04%
(15)		Customer Deposits Active	0.67%	2.61%	0.02%
(16)		Customer Deposits Inactive	0.01%	0.00%	0.00%
(17)		Investment Tax Credits	0.89%	8.13%	0.07%
(18)		Deferred Income Taxes	11.94%	0.00%	0.00%
(19)			100%		
(20)	Σ (12) ... (18)	WACC at Proposed ROE (11.50%)			7.07%
(21)	Schedule A-1	Total Retail Rate Base (\$000)		\$	22,198,157
(22)	(8) x (9)	Net Operating Income, Proposed ROE (\$000)		\$	1,568,784
Increase in Revenue Requirement from Increase in ROE					
(11)	(10) - (5)	Difference in Net Operating Income (\$000)		\$	132,254
(12)	Schedule A-1	Net Operating Income Multiplier			1.34400
(13)	(11) / (12E)	Increase Related to Increase in ROE		\$	177,750
(14)	Schedule A-1	Proposed Revenue Requirement Increase (\$000)		\$	593,446
(15)	(13)/(14)	Percent Increase Related to Increase in ROE			30.0%

Impact of DEF's Proposed Increase in Return on Equity (\$000) vs. ROE Trigger, PTY 2025

Currently Authorized ROE Trigger (10.1%)					
		Capital Component	Ratio	Cost	Weighted Cost
(1)	Schedule D-1a	Common Equity	45.61%	10.10%	4.61%
(2)	Schedule D-1a	Long Term Debt	40.68%	4.49%	1.83%
(3)	Schedule D-1a	Short Term Debt	-0.20%	3.25%	-0.01%
(4)	Schedule D-1a	Customer Deposits Active	0.76%	2.61%	0.02%
(5)	Schedule D-1a	Customer Deposits Inactive	0.01%	0.00%	0.00%
(6)	Schedule D-1a	Investment Tax Credits	1.00%	8.01%	0.08%
(7)	Schedule D-1a	Deferred Income Taxes	12.13%	0.00%	0.00%
(8)			100%		
(9)	Σ (1) ... (7)	WACC at Currently Authorized ROE Trigger (10.1%)			6.53%
(10)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(11)	(9) x (10)	Net Operating Income, Authorized ROE (\$000)		\$	1,340,185
Proposed ROE (11.15%)					
		Capital Component	Ratio	Cost	Weighted Cost
(12)		Common Equity	45.61%	11.15%	5.09%
(13)		Long Term Debt	40.68%	4.49%	1.83%
(14)		Short Term Debt	-0.20%	3.25%	-0.01%
(15)		Customer Deposits Active	0.76%	2.61%	0.02%
(16)		Customer Deposits Inactive	0.01%	0.00%	0.00%
(17)		Investment Tax Credits	1.00%	8.01%	0.08%
(18)		Deferred Income Taxes	12.13%	0.00%	0.00%
(19)			100%		
(20)	Σ (12) ... (18)	WACC at Proposed ROE (11.50%)			7.01%
(21)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(22)	(8) x (9)	Net Operating Income, Proposed ROE (\$000)		\$	1,438,525
Increase in Revenue Requirement from Increase in ROE					
(11)	(10) - (5)	Difference in Net Operating Income (\$000)		\$	98,340
(12)	Schedule A-1	Net Operating Income Multiplier			1.34330
(13)	(11) / (12E)	Increase Related to Increase in ROE		\$	132,100
(14)	Schedule A-1	Proposed Revenue Requirement Increase (\$000)		\$	593,446
(15)	(13)/(14)	Percent Increase Related to Increase in ROE			22.3%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2021 to Present

State (1)	Utilities (2)	Parent Company Ticker (3)	Docket (4)	Requested ROE (5)	Order Date (6)	Vertically Integrated (V) / Distribution Only (D) (7)	Approved ROE (8)	Difference (9) (8) - (5)	ROE Fully Litigated or Settled (11)	Approved WACC (12)	Approved Equity Ratio (13)	Equity Contribution (14) (8) X (13)
Alaska	Alaska Electric Light Power	AVA	U-22-078	13.45%	8/31/2023	V	11.45%	(200)	Fully Litigated	8.79%	60.70%	6.95%
Colorado	Public Service Co. of CO	XEL	22AL-0.530E	10.25%	9/6/2023	V	9.30%	(95)	Settled	6.95%	55.69%	5.18%
Montana	MDU Resources Group	MDU	2022-11-099	10.50%	9/21/2023	V	9.65%	(85)	Settled	7.53%	50.30%	4.85%
Kentucky	Duke Energy Kentucky Inc.	DUK	2022-00372	10.35%	10/12/2023	V	9.75%	(60)	Fully Litigated	N/A	52.15%	5.08%
New York	NY State Electric & Gas Corp.	IBE	22-E-0317	10.20%	10/12/2023	D	9.20%	(100)	Settled	6.40%	48.00%	4.42%
New York	Rochester Gas & Electric Corp.	IBE	22-R-0319	10.20%	10/12/2023	D	9.20%	(100)	Settled	6.67%	48.00%	4.42%
Maryland	The Potomac Edison Co.	FE	9695	10.60%	10/18/2023	D	9.50%	(110)	Fully Litigated	6.92%	53.06%	5.04%
New Mexico	Southwestern Public Svc Co.	XEL	22-00286-UT	10.75%	10/19/2023	V	9.50%	(125)	Settled	7.17%	54.70%	5.20%
Montana	North Western Energy Group	NWE	2022-7-78 (elec)	10.54%	10/25/2023	V	9.65%	(89)	Settled	6.72%	48.02%	4.63%
Oklahoma	Public Service Co. of OK	AEP	PUD2022-000093	10.40%	11/3/2023	V	9.30%	(110)	NA	6.69%	52.00%	4.84%
Wisconsin	Madison Gas and Electric Co.	MGEE	3270-UR-125 (Elec)	9.80%	11/3/2023	V	9.70%	(10)	Fully Litigated	N/A	55.00%	5.34%
Wisconsin	Northern States Power Co.	XEL	4220-UR-126 (Elec)	10.25%	11/9/2023	V	9.80%	(45)	Fully Litigated	N/A	52.50%	5.15%
Wisconsin	Wisconsin Power and Light Co	LNT	6680-UR-124 (Elec)	10.00%	11/9/2023	V	9.80%	(20)	Fully Litigated	N/A	54.00%	5.29%
New Jersey	Atlantic City Electric Co.	EXC	ER23020991	10.50%	11/17/2023	D	9.60%	(90)	Settled	6.58%	50.20%	4.82%
Wyoming	PacificCorp	BRK.A	200000-633-ER-23	10.00%	11/28/2023	V	9.35%	(65)	Fully Litigated	7.13%	48.99%	4.58%
Michigan	DTE Electric Co.	DTE	U-21297	10.25%	12/1/2023	V	9.90%	(35)	Fully Litigated	5.56%	N/A	NA
California	PacificCorp	BRK.A	A-22-05-006	10.50%	12/1/2023	V	10.00%	(50)	Fully Litigated	7.34%	52.25%	5.23%
Illinois	Ameren Illinois	AEE	23-0082	10.50%	12/14/2023	D	8.72%	(178)	Fully Litigated	6.59%	50.00%	4.36%
Illinois	Commonwealth Edison Co.	EXC	23-0055	10.65%	12/14/2023	D	8.91%	(174)	Fully Litigated	6.70%	50.00%	4.46%
Maryland	Baltimore Gas and Electric Co.	EXC	9692	10.40%	12/14/2023	D	9.50%	(90)	Fully Litigated	6.77%	52.00%	4.94%
North Carolina	Duke Energy Carolinas LLC	DUK	E-7 Sub 1276	10.40%	12/15/2023	V	10.10%	(30)	Fully Litigated	7.50%	53.00%	5.35%
Oregon	Portland General Electric Co.	POR	UE-416	9.80%	12/18/2023	V	9.50%	(30)	Settled	6.99%	50.00%	4.75%
Nevada	Nevada Power Co.	BRK.A	23-06007	10.26%	12/26/2023	V	9.52%	(74)	Fully Litigated	7.44%	52.72%	5.02%
Idaho	Idaho Power Co.	IDA	IPC-E-23-11	10.40%	12/28/2023	V	9.60%	(80)	Settled	7.25%	N/A	N/A
New Mexico	Public Service Co. of NM	PNM	22-00270-UT	10.25%	1/3/2024	V	9.25%	(100)	Fully Litigated	6.47%	49.61%	4.59%
Kentucky	Kingsport Power Company	AEP	2023-00159	9.90%	1/19/2024	V	9.75%	(15)	Settled	NA	41.25%	4.02%
Arizona	UNS Electric Inc.	FIS	E-04204A-22-0251	9.95%	1/31/2024	V	9.75%	(20)	Fully Litigated	7.18%	53.72%	5.24%
New Jersey	Jersey Central Power & Light Co.	FE	ER23030144	10.40%	2/14/2024	D	9.60%	(80)	Settled	7.18%	51.90%	4.98%
Virginia	Virginia Electric & Power Co.	D	PLR-2023-00101	9.70%	2/28/2024	V	9.70%	-	Settled	7.05%	N/A	N/A
Michigan	Consumers Energy Co.	CMS	U-21389	10.25%	3/1/2024	V	9.90%	(35)	Fully Litigated	5.86%	41.13%	4.07%
Arizona	Arizona Public Service Co.	PNW	E-01345A-22-0144	10.25%	3/5/2024	V	9.55%	(70)	Fully Litigated	6.81%	51.93%	4.96%
West Virginia	Monongahela Power Co.	FE	23-0460-E-42T	10.85%	3/26/2024	V	9.80%	(105)	Settled	N/A	N/A	N/A
Indiana	AES Indiana	AES	45911	10.60%	4/17/2024	V	9.90%	(70)	Settled	6.85%	44.36%	4.39%
Delaware	Delmarva Power & Light Co.	EXC	22-0897	10.50%	4/18/2024	D	9.60%	(90)	Settled	6.97%	50.50%	4.85%
Indiana	Indiana Michigan Power Co.	AEP	45933	10.50%	5/8/2024	V	9.85%	(65)	Settled	6.12%	N/A	N/A
Entire Period												
# of Decisions			118									
Average	(All Utilities)			10.13%			9.50%	(62)		6.80%	50.50%	4.77%
Average	(Distribution Only)			9.82%			9.13%	(69)		6.67%	49.61%	4.50%
Average	(Vertically Integrated Only)			10.25%			9.62%	(62)		6.87%	50.90%	4.92%
Median	(All Utilities)			10.25%			9.50%			6.92%	50.81%	4.83%
Maximum	(All Utilities)			13.45%			11.45%			8.79%	60.70%	6.95%
Minimum	(All Utilities)			7.36%			7.36%			4.74%	39.62%	3.58%
Florida			3	10.70%			10.13%	(57)		6.26%	45.07%	4.48%
Settled				10.21%			9.55%	(66)		6.88%	50.42%	4.82%
Fully Litigated				10.02%			9.38%	(64)		6.71%	50.47%	4.74%
DUK			8	10.31%			9.73%	(59)				
2021												
# of Decisions			34									
Average	(All Utilities)			9.93%			9.38%	(55)		6.81%	49.93%	4.64%
Average	(Distribution Only)			9.39%			8.99%	(41)		6.71%	48.97%	4.36%
Average	(Distribution Only, exc. IL FRP)			9.90%			9.39%	(51)		6.94%	48.72%	4.56%
Average	(Vertically Integrated Only)			10.15%			9.54%	(60)		6.87%	50.38%	4.78%
2022												
# of Decisions			29									
Average	(All Utilities)			9.96%			9.45%	(51)		6.65%	50.48%	4.77%
Average	(Distribution Only)			9.58%			9.11%	(47)		6.68%	50.39%	4.60%
Average	(Distribution Only, exc. IL FRP)			10.08%			9.47%	(61)		6.89%	50.58%	4.80%
Average	(Vertically Integrated Only)			10.13%			9.60%	(53)		6.64%	50.52%	4.86%
2023												
# of Decisions			44									
Average	(All Utilities)			10.35%			9.59%	(77)		6.92%	51.42%	4.92%
Average	(Distribution Only)			10.26%			9.24%	(102)		6.56%	49.23%	4.55%
Average	(Distribution Only, exc. IL FRP)			10.20%			9.33%	(87)		6.55%	49.07%	4.58%
Average	(Vertically Integrated Only)			10.39%			9.71%	(67)		7.09%	52.40%	5.09%
2024												
# of Decisions			11									
Average	(All Utilities)			10.29%			9.70%	(59)		6.72%	48.05%	4.64%
Average	(Distribution Only)			10.45%			9.60%	(85)		7.08%	51.20%	4.92%
Average	(Distribution Only, exc. IL FRP)			10.45%			9.60%	(85)		7.08%	51.20%	4.92%
Average	(Vertically Integrated Only)			10.25%			9.72%	(53)		6.62%	47.00%	4.55%

Source: S&P Global Market Intelligence

Last Updated: 6/3/2024

V Weighted to include ratemaking-principles rate base and ROE

μ S&P incorrectly reports this value as 9.6%

λ S&P incorrectly reports the ROE as 10.26% and the authorized ROE as 9.56%

Impact of DEF's Proposed Increase in Return on Equity (\$000) vs. 2024 National Average, Vertically Integrated

National Average Authorized ROE, 2024 (9.72%)					
		Capital Component	Ratio	Cost	Weighted Cost
(1)	Schedule D-1a	Common Equity	45.61%	9.72%	4.43%
(2)	Schedule D-1a	Long Term Debt	40.68%	4.49%	1.83%
(3)	Schedule D-1a	Short Term Debt	-0.20%	3.25%	-0.01%
(4)	Schedule D-1a	Customer Deposits Active	0.76%	2.61%	0.02%
(5)	Schedule D-1a	Customer Deposits Inactive	0.01%	0.00%	0.00%
(6)	Schedule D-1a	Investment Tax Credits	1.00%	8.01%	0.08%
(7)	Schedule D-1a	Deferred Income Taxes	12.13%	0.00%	0.00%
(8)			100%		
(9)	Σ (1) ... (7)	WACC at 2024 National Average Authorized ROE (9.72%)			6.35%
(10)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(11)	(9) x (10)	Net Operating Income, Authorized ROE (\$000)		\$	1,304,283
Proposed ROE (11.15%)					
		Capital Component	Ratio	Cost	Weighted Cost
(12)		Common Equity	45.61%	11.15%	5.09%
(13)		Long Term Debt	40.68%	4.49%	1.83%
(14)		Short Term Debt	-0.20%	3.25%	-0.01%
(15)		Customer Deposits Active	0.76%	2.61%	0.02%
(16)		Customer Deposits Inactive	0.01%	0.00%	0.00%
(17)		Investment Tax Credits	1.00%	8.01%	0.08%
(18)		Deferred Income Taxes	12.13%	0.00%	0.00%
(19)			100%		
(20)	Σ (12) ... (18)	WACC at Proposed ROE (11.50%)			7.01%
(21)	Schedule A-1	Total Retail Rate Base (\$000)		\$	20,534,271
(22)	(8) x (9)	Net Operating Income, Proposed ROE (\$000)		\$	1,438,525
Increase in Revenue Requirement from Increase in ROE					
(11)	(10) - (5)	Difference in Net Operating Income (\$000)		\$	134,241
(12)	Schedule A-1	Net Operating Income Multiplier			1.34330
(13)	(11) / (12E)	Increase Related to Increase in ROE		\$	180,327
(14)	Schedule A-1	Proposed Revenue Requirement Increase (\$000)		\$	593,446
(15)	(13)/(14)	Percent Increase Related to Increase in ROE			30.4%

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 11th day of June, 2024, to the following:

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