STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER COMPANY, AN INDIANA CORPORATION, FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE THROUGH A PHASE IN RATE ADJUSTMENT; AND FOR APPROVAL OF RELATED RELIEF INCLUDING: (1) REVISED DEPRECIATION RATES, INCLUDING COST OF REMOVAL LESS SALVAGE, AND UPDATED DEPRECIATION EXPENSE; (2) ACCOUNTING RELIEF, INCLUDING DEFERRALS AND AMORTIZATIONS; (3) INCLUSION OF CAPITAL INVESTMENT; (4) RATE ADJUSTMENT MECHANISM PROPOSALS, INCLUDING NEW GRANT PROJECTS RIDER AND MODIFIED TAX RIDER; (5) A VOLUNTARY RESIDENTIAL CUSTOMER POWERPAY PROGRAM; (6) WAIVER OR DECLINATION OF JURISDICTION WITH RESPECT TO CERTAIN RULES TO FACILITATE IMPLEMENTATION OF THE POWERPAY PROGRAM; (7) COST RECOVERY FOR COOK PLANT SUBSEQUENT LICENSE RENEWAL EVALUATION PROJECT; AND (8) NEW SCHEDULES OF RATES, RULES AND REGULATIONS	)	**CAUSE NO. 45933**

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

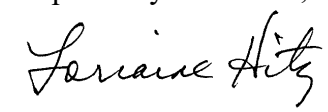
PUBLIC'S EXHIBIT NO. 10

TESTIMONY OF OUCC WITNESS

DAVID E. DISMUKES

NOVEMBER 15, 2023

Respectfully submitted,



Lorraine Hitz
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DIRECT TESTIMONY OF

DAVID E. DISMUKES, PH.D.

ON BEHALF OF

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

November 15, 2023

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is David E. Dismukes. My business address is 5800 One Perkins Place Drive, Suite 5-F, Baton Rouge, Louisiana, 70808.

Q. PLEASE STATE YOUR OCCUPATION AND CURRENT PLACE OF EMPLOYMENT?

A. I am a consulting economist with the Acadian Consulting Group ("ACG").

Q. PLEASE DESCRIBE ACG AND ITS AREAS OF EXPERTISE.

A. ACG is a research and consulting firm that specializes in the analysis of regulatory, economic, financial, accounting, statistical, and public policy issues associated with regulated and energy industries. ACG is a Louisiana-registered partnership, formed in 1995, and located in Baton Rouge, Louisiana.

Q. DO YOU HOLD ANY ACADEMIC POSITIONS?

A. Yes. I am a professor emeritus at Louisiana State University ("LSU"). Prior to my retirement this past January, I served as a full professor, executive director, and director of policy analysis at the LSU Center for Energy Studies and as a full professor in the Department of Environmental Sciences and the director of the Coastal Marine Institute in the LSU College of the Coast and Environment. I also served as a senior fellow at the Institute of Public Utilities at Michigan State University, where I taught energy regulatory staff and other utility stakeholders about principles, trends, and issues in the electric and natural gas industries. I am also a Distinguished Fellow and Senior Economist with the Institute for Energy Research in Washington, D.C.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE INDIANA UTILITY REGULATORY COMMISSION?

A. Yes. My academic vitae is attached at Appendix A. It includes a list of the Indiana Utility Regulatory Commission ("Commission" or "IURC") proceedings in which I have testified, a list of all my publications, presentations, pre-filed expert witness testimony in other jurisdictions, expert reports, expert legislative testimony, and affidavits.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I have been retained by the Indiana Office of Utility Consumer Counselor ("OUCC") to address certain regulatory and policy issues related to the general rate cases filed by Indiana Michigan Power Company ("I&M," or "the Company"). I specifically have been asked to address the Company's proposed allocated cost of service study ("ACOSS"), revenue distribution, and rate design.

Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

A. The balance of my testimony is organized into the following sections:

- Section II: Summary of Recommendations
- Section III: Cost of Service Study
- Section IV: Revenue Distribution
- Section V: Rate Design
- Section VI: Service Fees
- Section VII: Conclusion and Recommendations

II. SUMMARY OF RECOMMENDATIONS

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED JURISDICTIONAL COST OF SERVICE STUDY?

A. I recommend the Commission approve the Company's jurisdictional cost of service study ("JCOSS") as representing a reasonable representation of the relative cost of service for the Company's Indiana service territory relative to its other service territories.

Q. PLEASE SUMMARIZE YOUR ACOSS FINDINGS.

A. The Company's ACOSS incorrectly classifies fixed costs associated with production plant assets as exclusively demand-related. This is inconsistent with the role these production/generation assets play in serving the Company's system requirements, and deviates from commonly accepted cost allocation practices. I also find that the Company's use of the average of six monthly coincident peaks ("6 CP") is inconsistent with the operational demands placed on the Company's system, and skews the allocation of costs and revenue responsibilities away from larger customers onto residential and small commercial customers. I instead recommend the Commission use the average of twelve monthly coincident peaks ("12 CP") as the appropriate demand measure for the Company.

Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE COMPANY'S PROPOSAL TO INCREASE CUSTOMER CHARGES IN THE CURRENT PROCEEDING?

A. I recommend the Commission reject the Company's proposed increase in customer charges. The Company's proposal would detrimentally impact the public policy goals of promoting energy efficiency. Likewise, it would burden low-use customers with a greater than average portion of any proposed increase in the case.

Q. HAVE YOU PREPARED UPDATED RIDER RATES IN THE CURRENT PROCEEDING?

A. Yes. Exhibit DED-14 presents an illustrative comparison of the Company's proposed rider rates for the Environmental Cost Rider ("ECR"), Off-System Sales Margin and PJM Cost Rider ("OSS_PJM"), and Solar Power Rider ("SPR"), based on an appropriate 12 CP demand measure. Likewise, Exhibit DED-15 presents a comparison of the Company's proposed Transmission and Distribution System Improvement Charge ("TDISC") based on the results of my recommended ACOSS. In general, the Company's proposed rider revenue rates inappropriately shift the allocation of rider responsibility from larger customers onto residential and small commercial customers.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE DISTRIBUTION?

A. I recommend that the Commission adopt a more reasonable revenue distribution allocation method based on my alternative ACOSS results that also limits the rate increase to any single customer class to 1.15 times the overall system average increase. This reduces the maximum total revenue increase of any single rate class to 8.29 percent, compared to the Company's proposed maximum rate increase of 9.35 percent.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSAL TO MODIFY ITS SERVICE FEES?

A. I recommend the Commission reject the Company's proposal to modify its service fees in the current proceeding. The Company's proposal is a solution in search of

a problem. The Company has not experienced significant service requests in recent years to justify its proposed increases in service fees, some of which it proposes to more than double.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES TO INCREASE THE COMPANY'S SERVICE FEES?

A. Yes. If, in the alternative, should the Commission allow an increase to the Company's service fees, I recommend that the Commission set this increase at no more than the general rate of inflation, as measured by the gross domestic product – producer index ("GDP-PI"), for the time period since the Company's last general rate case.

III. COST OF SERVICE STUDIES

A. INTRODUCTION

Q. WHAT IS THE PURPOSE OF A JURISDICTIONAL AND ALLOCATED COST OF SERVICE STUDY?

A. Cost of service studies, whether Jurisdictional Cost of Service Studies ("JCOSS") or Allocated Cost of Service Studies ("ACOSS"), are modeling approaches that reconcile utility costs and revenues: in the case of a JCOSS, the reconciliation is across differing regulatory jurisdictions and for an ACOSS, across differing customer classes. These studies estimate the cost-based revenue responsibility for each individual jurisdiction or customer class. ACOSS results, in particular, are used to estimate class specific rates of return and often serve as a guidepost for class revenue responsibilities and ultimately rates.

Q. HOW ARE COST OF SERVICE STUDIES PREPARED?

A. Cost of service studies utilize a set of historic or project cost information which is (1) "functionalized," (2) "classified," and (3) "allocated." The functionalization process simply categorizes costs based upon the functions they serve within a utility's overall operations (i.e., production, transmission, and distribution). The classification process characterizes costs by "type", including those that are (1) demand-related, (2) commodity-related, or (3) customer-related. The last step of the process "allocates" each of these costs to a respective jurisdiction or customer class as appropriate.

Q. PLEASE EXPLAIN DEMAND-RELATED COSTS.

A. Demand-related costs are associated with meeting maximum electricity demands. At the distribution level, electric substations and line transformers are designed, in part, to meet the maximum customer demand requirements. The most common demand allocation factors used in cost of service studies are those related to system coincident peaks ("CP") or con-coincident peaks ("NCP"). At the production level, most power plants, also referred to as production plants, or electric generation units ("EGU"), are typically viewed as being designed to serve both the energy and demand/capacity needs of the utility. The exact degree of this split between energy and demand depends on the individual EGU in question and how that unit is dispatched with more baseload units serving more of the utility's energy needs and more peak units serving more of the utility's capacity or demand needs. Therefore, it is not uncommon to develop composite energy and demand allocators to allocate plant-in-service costs associated with a utility's generation fleet.

Q. HOW ARE ENERGY-RELATED COSTS DEFINED?

A. Energy-related costs are defined as those that tend to change with the amount or volume of electricity (i.e., kilowatt-hour ("kWh")) sold. Electric generation costs and high-voltage transmission lines, for instance, can be allocated, in part, based on some measure of electricity sales.

Q. WHAT ABOUT CUSTOMER-RELATED COSTS?

A. Customer-related costs are those associated with connecting customers to the distribution system, metering household or business usage, and performing a variety of other customer support functions.

Q. IS THIS A RELATIVELY SIMPLE PROCESS?

A. No. Some costs can be clearly identified and directly assigned to a function or category, while other costs are more ambiguous and difficult to assign. The primary challenge in conducting an ACOSS is the treatment of what are known as "joint and common" costs. Given their shared or integrated nature, these joint and common costs can often be difficult to compartmentalize. Therefore, unique allocation factors are utilized in a Class Cost of Service Study ("CCOSS") to classify joint and common costs. The process of developing these cost allocation factors can become subjective and is often imbued with policy considerations.

Q. HOW DOES AN ACOSS RELATE TO COMMONLY QUOTED ECONOMIC PRINCIPLES?

A. An ACOSS is referred to as a "fully allocated cost study" since it allocates test year revenues, rate base, expenses, and depreciation to various jurisdictions and customer classes based upon a series of different allocation factors. The purpose of the ACOSS is to develop cost responsibility estimates for each customer class,

which in turn, can be used to develop rates. An ACOSS is based upon a set of historic utility book costs that have accumulated over decades. Rates are, therefore, based upon historic average costs; whereas economic theory suggests that the most efficient form of pricing in perfectly competitive markets should be based upon marginal costs. However, regulated utilities do not operate in perfectly competitive markets and, by their very nature, are natural monopolies. Thus, reaching the ideal pricing formula outlined in economic theory is impossible since the nature of natural monopolies makes pricing in the presence of declining average costs, coupled with the presence of joint and common costs, difficult.

Q. ARE THERE ANY OTHER CONFOUNDING PROBLEMS THAT CAN ARISE WITH AN ACOSS?

A. Yes. The problems listed above are confounded by the fact that the cost information utilized in an ACOSS is usually historic and static, not dynamic, and forward-looking. These analytic deficiencies undermine many experts' cost causation/pricing claims. As a result, in regular practice there is no single correct answer that is revealed in an ACOSS. It is often up to regulators to exercise an appropriate level of judgment regarding the nature of these costs, the results of the ACOSS, and the implications both have in setting fair, just, and reasonable rates. This is one of the reasons why many regulators use ACOSS results as a "guide" in setting rates and are not unnecessarily bound by their results.

Q. WHAT CONTROVERSIES ARISE IN THE ANALYSIS AND COMPARISON OF VARIOUS ACOSS METHODOLOGIES?

A. The ACOSS process is significantly different than the revenue requirement or cost of capital phase of a typical rate case. While the latter two processes focus on determining how much revenue will be recovered through rates, the ACOSS process determines how those costs (revenue requirements) will be recovered through customer rates. The primary controversy with the evaluation of various ACOSS results often rests with determining whether costs (revenue requirements) will be recovered by the relative customer share of each class, the peak load contributions of each customer class, or whether and how the approach will be tempered through the use of customer, peak, and off-peak usage considerations. Methodologies that are heavily skewed toward customer and peak considerations, for instance, can tend to shift costs more than proportionally to relatively lower load-factor customers, such as residential and small commercial customers, and less costs to larger high load factor customer classes and off-peak customers. These approaches can also fail to capture the service being provided by the utility (i.e., electric service in this case), and how the value of that service varies by the amount purchased by different customer classes.

Q. PLEASE EXPLAIN THE BIAS IN METHODOLOGIES THAT ARE SKEWED TOWARD PEAK CONSIDERATIONS.

A. Residential and small commercial customer electricity loads are typically weather sensitive. Larger industrial customers, on the other hand, use electricity in processes that are generally not weather sensitive, and tend not to cycle up and down, but rather run on a more continuous basis. Because of this, daily and annual usage patterns for these two customer classes are significantly different. The peak

loads for residential and small commercial customers tend to be more “peaked” than those for industrial customers, which are steadier and more evenly distributed across peak and non-peak hours. For example, an average residential customer may have relatively little electricity use during overnight hours and during weekday day-time working hours. Residential customers do exhibit relatively significant use during early summer evening hours corresponding to returning home from work, and potentially during chilly early winter morning hours if the customer uses electric resistance heating. Similarly, small commercial customers see limited electricity use outside of workday hours. Thus, residential and small commercial customers tend to have relatively lower load factors than large industrial customers.

Q. PLEASE DEFINE WHAT IS MEANT BY A “LOAD FACTOR.”

A. A load factor is defined as the ratio of the average load in kilowatt hours supplied during a designated period to the peak or maximum load in kilowatts occurring in that period. The load factor is expressed as a percentage and may be derived by taking the energy used during a period and dividing it by the product of the maximum demand and the number of hours in the period. A system that is estimated to have a high load factor is often thought to be utilizing electricity more efficiently since usage is consistent and does not swing largely between average and peak periods. Conversely, systems with low load factors must maintain idle capacity in order to meet the relatively large swings in load between average and peak periods.

Q. DOES A HIGH LOAD FACTOR INDICATE GREATER SYSTEM EFFICIENCY?

A. Yes, since a higher system load factor can be indicative of, or lead to better system resource utilization, other things being equal. However, it should be recognized that all utilities inherently have customers with different load profiles due to differences in how customers use electricity. Furthermore, the development of integrated wholesale bulk electricity transmission systems has allowed utilities to collectively diversify generation resources and individual system demands, which has reduced the impact of individual system load characteristics on generation needs in recent years. While rates should recognize and promote the efficient utilization of utility system resources, one should use caution in placing too much emphasis on this principle of rewarding high load factor industrial customers to the detriment of low load factor residential and small commercial customers.

Q. WHAT IMPACT DOES COST ALLOCATION HAVE ON REVENUE RECOVERY?

A. Higher use customers, such as industrial customers, are inherently more price sensitive than lower use customers due to the relative impact increases in rates can have on these customers' total utility bills and the margins of produced goods. These higher use industrial customers tend to have more energy supply alternatives that can include fuel switching and self-generation, which is part of the reason why they are more price sensitive. These considerations can result in differences in revenue generation given the differences in the price elasticities of demand (i.e., price sensitivities) for different sets of customers (residential, commercial, industrial).

Q. EXPLAIN HOW SOME ACOSS METHODS CAN BE BIASED AGAINST LOWER LOAD-FACTOR CUSTOMERS.

A. Utilities by their nature are capital intensive industries. Therefore, the methods utilized for classifying and allocating these capital costs (e.g., utility "plant in service") largely affect the cost of providing service. An exaggerated emphasis on peak demand factors, for instance, can result in more capital (plant) costs being assigned to price sensitive customers. Likewise, a greater emphasis on non-diversified single CP demands, NCP demands, and individual customer demands in allocating costs associated with transmission and distribution plant facilities can favor high-load factor customers relative to low-load factor customers. Finally, an over-emphasis on customer connection aspects of lower voltage distribution facilities can tend to favor high-use customers relative to low-use customers.

B. OVERVIEW OF COMPANY'S JCOSS.

Q. PLEASE DESCRIBE I&M'S JCOSS APPROACH.

A. The Company's JCOSS relies on a traditional three-step approach that functionalizes, classifies, and allocates costs between its Indiana and non-Indiana jurisdictions. First, the Company functionalizes its costs into three separate functions: production; transmission; and distribution.[1] Second the Company classifies its costs as demand, energy, or customer related.[2] Finally, the Company develops appropriate cost allocations to allocate costs between jurisdictions.[3]

[1] Direct Testimony of Jennifer C. Duncan at 6:16-17.
[2] *Id.* at 6:18.
[3] *Id.* at 6:19-20.

Q. HOW DOES THE COMPANY ALLOCATE NON-VARIABLE COSTS ASSOCIATED WITH PRODUCTION AND TRANSMISSION PLANT ASSETS?

A. The Company classifies 100 percent of non-variable costs associated with production and transmission plant assets as being demand-related and utilizes each jurisdictions' relative contribution to the average of 12 monthly coincident peaks ("12 CP") to allocate costs between jurisdictions.[4]

Q. IS IT REQUIRED THAT JCOSS ALLOCATION METHODOLOGIES BE CONSISTENT WITH ACOSS?

A. No, since ACOSS and JCOSS have different considerations. An ACOSS allocates a Commission-determined revenue requirement to various customer classes, while a JCOSS seeks to determine the appropriate jurisdictional-revenue requirement based on a calculated system-wide revenue responsibility. Therefore, it is important that JCOSS allocation approaches be reasonably consistent across jurisdictions to prevent a utility from chronically over- or under-recovering its system-wide revenue responsibilities.

Q. HAVE YOU REVIEWED THE COMPANY'S JCOSS APPROACH IN OTHER JURISDICTIONS?

A. Yes, I have reviewed the Company's JCOSS approach utilized in its Michigan service territory. The Company's proposed JCOSS in the current proceeding is consistent with that employed to allocate revenue responsibility to its Michigan service territory, including the use of 12 CP to allocate costs associated with production and transmission plant assets.

[4] *Id.* at 10:9-10.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED JCOSS?

A. I recommend the Commission approve the Company's JCOSS because it is a reasonable representation of the relative cost of service for the Company's Indiana service territory relative to its other service territories.

C. OVERVIEW OF COMPANY'S ACOSS

Q. PLEASE DESCRIBE I&M'S ACOSS APPROACH.

A. The Company also utilizes the traditional three-step approach to ACOSS. First the Company functionalizes its costs to five separate functions: production and purchase power; transmission; distribution; customer service; and administrative and general ("A&G").[5] Second, the Company classifies these functionalized costs to three separate purposes: demand costs; energy costs; and customer costs.[6] Finally, the Company defines a series of individual allocators to allocate these functionalized and classified costs to individual rate classes.[7]

Q. PLEASE DESCRIBE HOW THE COMPANY CLASSIFIES NON-VARIABLE PRODUCTION, TRANSMISSION, AND SUB-TRANSMISSION RELATED COSTS.

A. The Company classifies the non-variable costs associated with its production plant, transmission plant, and sub-transmission plant facilities as 100 percent demand-related, measuring demand using each class's average relative coincident peak demands during six months of the test period ("6 CP"). This

[5] Direct Testimony of Michael S. Small at 6:21 to 7:11.
[6] *Id.* at 7:15-20.
[7] *Id.* at 9:8-18.

demand measure is used to classify production, transmission, and sub-transmission facilities costs.[8] The Company's six defined peak demand months include three winter months (December through February), and three summer months (June through August).[9]

Q. WHY DOES THE COMPANY PROPOSE TO USE THIS 6 CP DEMAND MEASURE?

A. The Company notes that it has relied on a 6 CP methodology in its last four base rate cases (Cause Nos. 45576, 45235, 44967, and 44075),[10] and that this method continues to be appropriate since its load profile during the test year reflects a peak period consisting of three summer and three winter months.[11] The Company argues, therefore, that its engineers must plan and size equipment to meet customers' maximum expected demand during these summer and winter peak months.[12]

Q. PLEASE EXPLAIN HOW THE COMPANY FUNCTIONALIZES AND CLASSIFIES ITS NON-CUSTOMER DISTRIBUTION PLANT INVESTMENTS.

A. The Company classifies distribution plant Accounts 360 through 368 as 100 percent demand-related.[13] Distribution plant accounts 360 through 362, related to substations, were classified as demand related using individual customer class 6 CP demands.[14] Distribution plant accounts 364 through 367, related to overhead and underground lines, are split between primary and secondary voltage functions

[8] *Id.* at 12:9-15; and 14:2-6.
[9] *Id.* at 13:1-4; and Company's Response to Data Request OUCC 6-08, Attachment 1.
[10] Direct Testimony of Michael S. Small at 5:3-5; and 12:18-22.
[11] *Id.* at 13:8-10.
[12] *Id.* at 13:12-15.
[13] *Id.* at 14:23-26.
[14] *Id.* at 14:26 to 15:4.

and allocated separately.[15] Costs associated with primary voltage lines were classified as demand related using individual customer class 6 CP demands,[16] while costs associated with secondary voltage lines were classified as demand related using individual customer class combinations of relative individual class NCP and the summation of individual customers' annual maximum demands within a customer class.[17]

Q. HAVE YOU EXAMINED THE COMPANY'S ACOSS RESULTS?

A. Yes. Exhibit DED-1 presents the results of the Company's ACOSS which estimates an overall test year rate of return ("ROR") at current rates of 4.78 percent. Estimated individual class returns range from a negative 1.33 percent for the Transmission-voltage Large General Service ("LGS-Tran") class to 26.1 percent for the Sub-transmission-voltage General Service ("GS-Sub") class. The Residential ("RS") rate class is estimated by the Company to have achieved an ROR of 4.02 percent during the test year under current rates, which is 0.84 of the system average on a relative rate of return ("RORR") basis.

Q. DO YOU DISAGREE WITH ANY OF THE ASSUMPTIONS OR ALLOCATION FACTORS INCORPORATED IN THE COMPANY'S PROPOSED ACOSS?

A. Yes. I disagree with the Company's classification of fixed production costs as exclusively demand-related. I also disagree with the Company's use of 6 CP demand measures to classify these production plant and transmission plant costs.

[15] *Id.* at 15:10-13.
[16] *Id.* at 15:13-14.
[17] *Id.* at 15:14-17.

I will discuss each of these disagreements in greater detail in the following subsections of my testimony.

D. PRODUCTION PLANT CLASSIFICATION

Q. PLEASE DESCRIBE HOW THE COMPANY CLASSIFIES AND ALLOCATES PRODUCTION PLANT COSTS.

A. The Company classifies 100 percent of its fixed production plant costs as being entirely demand-related using a test year 6 CP demand measure for each class.[18]

Q. PLEASE EXPLAIN THE CONCERNS YOU HAVE WITH CLASSIFYING THESE COSTS AS EXCLUSIVELY DEMAND-RELATED.

A. I disagree with the Company's classification of production plant assets as only supporting the Company's maximum system demands. The Company's classification approach is inconsistent with the role these production/generation assets play in serving its system requirements.

Q. HOW DOES THE COMPANY'S PRODUCTION PLANT CLASSIFICATION DIFFER FROM HOW THESE ASSETS ARE UTILIZED?

A. EGUs serve both energy and demand/capacity needs of a utility. The exact degree of this demand/energy split, however, varies by individual utility depending upon the composition of its generation plants and the role each generating plant plays in system dispatch. Historically, "baseload" generation units were used to serve steady, consistent, multi-hour energy loads, whereas natural gas turbines and other "peakers" were used as demand changed in any given day. Therefore, it is

[18] *Id.* at 12:18-22.

not unreasonable to develop composite energy and demand allocators that represent this mixed use and classification.

Q. HAVE OTHER REGULATORY AGENCIES RECOGNIZED THIS JOINT ENERGY AND DEMAND ROLE FOR PRODUCTION PLANT ASSETS?

A. Yes. Other regulatory agencies, such as the Michigan Public Service Commission ("MPSC"), have recognized that energy loads are an important contributing factor of production plant costs and classify a portion of these production costs as energy-related.[19] As an example, in a 2015 review of cost of service allocations for DTE Electric Company ("DTE Electric"), the MPSC explained that utilities do not directly design generation to meet the needs of various customer types for only a few hours of the year, but rather utilize a variety of generators to both provide sufficient capacity and provide low-cost energy to customers.

> The Commission agrees with the Staff, the Attorney General, Energy Michigan, and [Environmental and Consumer Advocates] that DTE Electric's production system was not designed and built solely for the purpose of providing capacity for four hours a year. Indeed, if that were the case, DTE Electric's generation asset portfolio would be very different and would certainly include far fewer of the large base load units that comprise much of the company's current fleet. Instead of building a system to simply meet demand, the company developed its production plant to both deliver energy and provide capacity at the lowest overall cost to all customers who use the system. Thus, DTE Electric's generating system includes a mix of base load plants that were significant investments, but that provide abundant, reliable, and low-cost energy to all customers, and peaking plants, with low fixed production costs and typically higher fuel costs than the base load units. These peaking plants are the units that are used to meet peak demand in the summer months.[20]

[19] *In the matter, on the Commission's own motion to commence a proceeding to implement the provisions of Public Act 169 of 2014; MCL 460.11 (3) et seq., with regard to DTE Electric Company.* Case No. 17689, Opinion and Order, dated June 15. 2015.
[20] *Id.*

Q. CAN YOU PROVIDE SOME EXAMPLES OF COMMONLY USED CLASSIFICATION METHODS THAT REFLECT THE DIVERSITY OF PRODUCTION PLANT USE?

A. Yes. Examples of these composite energy and demand allocators include the Average and Peak ("A&P") cost allocation methodology, also called the Peak and Average cost allocation methodology, and the Average and Excess ("A&E") cost allocation methodology.

Q. EXPLAIN HOW THE A&P METHOD CLASSIFIES PRODUCTION PLANT COSTS.

A. The A&P method is a subset of the larger category of production plant cost allocation methods categorized by the NARUC Electric Utility Cost Allocation Manual as "Judgmental Energy Weightings."[21] The A&P method has two components. The first component, referred to as the "average" component, represents each customer class's average hourly energy consumption throughout the test year, and is calculated by simply dividing annual energy consumption for each customer class by 8,760, the number of hours in a year. The second component, referred to as the "peak" component, represents each class's contribution to system peak demand. Judgment is used to determine the appropriate weighting of each of these two components,[22] though one empirical way in which these weightings can be derived is based on a utility's system load factor. In this way the average component is weighted by the utility's overall system

[21] Electric Utility Cost Allocation Manual (January 1992), National Association of Regulatory Utility Commissioners ("NARUC"), pp. 57-59.

[22] *Id.* at p. 57.

load factor, while the excess component is weighted by the inverse of the system load factor (i.e., one minus the system load factor).

Q. HAVE YOU CALCULATED THE SYSTEM LOAD FACTOR FOR THE COMPANY?

A. Yes. Exhibit DED-2 shows the Company's estimated system load factor for 2024 using both the Company's proposed 6 CP and an alternative 12 CP. My analysis shows that the Company's system load factor is 70 percent when using a 6 CP measure of peak demand, and 75 percent when using a 12 CP measure of peak demand. I have provided both 6- and 12-month CP measures since I have an issue with the Company's use of a 6 CP based method. I will explain this issue in the following sub-section of my testimony.

Q. WHAT DOES THE COMPANY'S PROJECTED LOAD FACTOR FOR THE TEST YEAR IMPLY?

A. The results of this analysis suggest a 100 percent classification of non-variable production costs as demand-related is too heavily weighted toward demand considerations relative to energy when compared to the Company's actual reported data.

Q. ARE THERE WAYS TO EMPIRICALLY ASSESS THE FUNCTION INDIVIDUAL GENERATION UNITS PROVIDE TO A UTILITY'S ELECTRICAL SYSTEM?

A. Yes. The most basic method is an examination of individual units' "capacity factors." The capacity factor is a measure of a generation plant's utilization. Units with a high-capacity factor are said to be operating at high utilization (like a

baseload generation plant), whereas a low capacity factor unit is typically one held in reserve to meet peak loads that are typically stimulated by weather.

Q. HAVE YOU ANALYZED THE COMPANY'S GENERATOR-SPECIFIC CAPACITY FACTORS?

A. Yes. Exhibit DED-3 presents the results of an analysis associated with each of the Company's non-renewable EGUs, and each unit's capacity factor during 2022 to characterize the role the unit serves in the Company's dispatch of electricity. All facilities with annual capacity factors of less than 15 percent were assumed to be fully classified as serving the utility's demand requirements, while most other facilities were divided between energy and demand classifications. This means that the Company's Donald C. Cook nuclear facility, which had an 83 percent capacity factor during 2022, was classified as 83 percent energy-related and 17 percent demand-related.

Q. WHAT ARE THE RESULTS OF YOUR ANALYSIS OF THE RELATIVE CLASSIFICATION OF INDIVIDUAL COMPANY GENERATION UNITS?

A. Exhibit DED-3 demonstrates that a substantial portion of the Company's 2022 gross plant in service was devoted to the provision of energy and not directly associated with meeting the Company's demand-needs. Specifically, I find that 69.1 percent of the Company's 2022 gross plant in service is appropriately classified as being energy-related, with 30.9 percent appropriately classified as being demand-related. However, the Company's methodology would classify 100 percent of this gross generation plant in service as necessary to meet its peak demand requirements, regardless of how those units are typically utilized.

Q. ARE THERE OTHER WAYS TO ANALYZE GENERATION FUNCTIONS?

A. Yes. Besides examination of individual capacity factors, one can also examine the levelized cost of each generation unit relative to established market analyses. For instance, Exhibit DED-4 presents the results of an analysis that examines the levelized annual cost for each of the Company's non-renewable EGUs compared with the "Cost of New Entry" (or "CONE") prices estimated by PJM for use in its markets as a default minimum offer price.[23] All costs less than the PJM CONE price can be classified as demand-related whereas prices above the PJM CONE can be classified as energy-related.

Q. WHAT ARE THE RESULTS OF YOUR CONE ANALYSIS?

A. Exhibit DED-4 shows that, at most, 63 percent of the Company's production plant in service could be classified as being associated with the provision of demand functions. This again is significantly different than the Company's proposed methods, which classify 100 percent of its production plant as demand-related.

Q. HOW DOES AN A&E METHODOLOGY DIFFER FROM THE A&P APPROACH FOR CLASSIFYING PRODUCTION PLANT?

A. Conceptually, the methods are similar since an A&E classification method also involves developing two components that are combined by the use of a weighted average.[24] Under an A&E approach, the first component, referred to as the "average" component, represents each rate class's average hourly energy consumption throughout the test year, and is calculated by simply dividing annual

[23] Final Default CONE Values (January 13, 2023); PJM.
[24] See, Electric Utility Cost Allocation Manual (January 1992), National Association of Regulatory Utility Commissioners, pp. 49-51.

energy consumption for each rate class by 8,760, the number of hours in a year. The second component, referred to as the "excess" component, represents each rate class's contribution to the sum of each customer class's maximum annual peak demand, or NCP. These components are combined through the use of a weighted average. The average component is weighted by the utility's overall system load factor while the excess component is weighted by the inverse of the system load factor (*i.e.*, 1 minus the system load factor).

Q. WHAT IS THE BASIS FOR THE "EXCESS DEMAND" DEMAND MEASURE VERSUS FULL PEAK DEMAND?

A. Superficially, the A&E method appears to develop a hybrid weighted energy and demand allocation factor, recognizing the joint energy and demand functions of production plant. However, it should not be confused with a simple weighting of class demand and energy requirements, similar to the previously referenced A&P methodology.[25] Proponents of the A&E cost allocation approach, typically large/industrial customer groups, argue that using full class peak demand "double counts" class energy use during periods. These stakeholders often argue that the use of "excess demand" rather than total demand solves this purported "double counting problem." However, in using the excess component only, the A&E methodology directly places a higher emphasis on each class's demand contribution relative to energy. Thus, the A&E method, itself, suffers from a bias that favors relatively higher load factor classes like industrial customers and at

[25] Id. at 57-58.

lower load factor classes' expense (such as residential and small commercial customers).

Q. DO YOU AGREE WITH CLAIMS ABOUT THE SUPERIORITY OF THE A&E METHODOLOGY?

A. No, such arguments incorrectly conflate the concepts of energy and demand and the roles each of these play in utility system planning. These arguments are also faulty since they effectively presume that utilities design systems to first meet the needs of baseload customers and only later develop resources dedicated to customers that have peaking requirements. In other words, it assumes utilities plan one set of generation plants for one group of customers (i.e., industrial), and an entirely different set of plants to serve another (i.e., residential and small commercial). All of these arguments are incorrect since, in reality, demand and energy reflect separate and differing utility planning parameters and system planners develop resources to meet all of their load requirements, not separately to meet individual, or class-specific requirement.

Q. PLEASE EXPLAIN WHAT YOU MEAN BY CONFLATING THE CONCEPTS OF ENERGY AND DEMAND AS IT RELATES TO UTILITY SYSTEM PLANNING.

A. This conflation presumes that energy and peak energy use are virtually consubstantial, with energy being part of peak energy use, and presumable peak being a part of energy. Peak energy usage, for instance, can be divided into a portion representing its average annual system requirement, and a second portion representing its load requirement in excess of this requirement. However, this conflation does not reflect the reality of utility system planning wherein a utility is

required to plan for energy and capacity system requirements as independent, not a single consubstantial system parameter. A utility must ensure that it has enough generating capacity to meet its peak system requirements (i.e., its coincident peak), as well as assure that the plant it develops to meet its load requirements are least cost in nature.

Q. CAN YOU PROVIDE AN EXAMPLE OF THIS LOGICAL ERROR?

A. Yes. Consider a customer class with a 100 percent load factor. The A&E methodology will assign the "excess demand" component of the calculation a zero value, since peak demand requirements equal average demand requirements, effectively considering the class as having no peak demand requirements. However, customer classes with a 100 percent load factor utilize system resources during all hours, both peak and off-peak. Thus, the A&E methodology effectively views the utility role in system planning as first serving the needs of its high load factor customers through baseload generation units, and then serving the needs of lower load factor customers through more expensive peaker generation units. The utility considers its needs on a total system basis, ensuring that it has sufficient resources to supply its customers during peak demand periods and sufficient baseload generation resources to supply its customers with relatively inexpensive energy during base demand periods.

Q. ARE THERE OTHER CONCERNS ASSOCIATED WITH AN A&E COST ALLOCATION METHODOLOGY?

A. Yes. There is a mathematical error that arises in the use of the A&E method, underscoring its weakness. In order to "make the math work," the A&E method

cannot use a traditional CP measure of demand (like the Company, and most utilities use), but instead must use an NCP measure.

Q. PLEASE EXPLAIN THIS MATHEMATICAL ISSUE.

A. The NARUC Manual notes that use of a 1 CP demand measure within an A&E calculation will result in estimates that are identical to a general 1 CP demand-only measure which effectively undermines the entire purpose of developing a hybrid demand-energy classification.[26] In order to prevent this outcome from occurring, the NARUC Manual suggests using an NCP demand measure:

> If your objective is – as it should be using [an A&E] method – to reflect the impact of average demand on production plant costs, then it is a mistake to allocate the excess demand with a coincident peak allocation factor because it produces allocation factors that are identical to those derived using a CP method. Rather, use the NCP to allocate the excess demands.[27]

Q. DO YOU BELIEVE THAT THE USE OF NCP IS AN APPROPRIATE MEASURE OF PEAK DEMAND FOR ALLOCATING COSTS RELATED TO PRODUCTION PLANT ASSETS?

A. No. First, utilities typically do not use NCP measures in planning, developing, or operating generation units since an NCP assumes a low level of load diversity thus amplifying customer peak demand requirements on the utility's system. In other words, if a utility did use an NCP measure for planning purposes, it would have to develop a unique set of generation plants for each of its major customer classes – something that clearly does not happen. While the use of an NCP may be

[26] Electric Utility Cost Allocation Manual (January 1992), National Association of Regulatory Utility Commissioners, at 50.
[27] *Id.*

appropriate for distribution facilities which serve isolated segments of a utility's system, it is not appropriate for generation assets that serve regional system demands with high levels of load diversity.[28] The observed computational problem inherent in the A&E method does not support its use and, if anything, suggests the need to use an alternative classification method that avoids this computation error.

Q EARLIER, YOU NOTED THAT THE A&P METHOD USES A LOAD FACTOR TO WEIGHT ITS VARIOUS COMPONENTS. HOWEVER, THE NARUC COST MANUAL USES A FORMULA THAT, ON ITS FACE, APPEARS DIFFERENT IN HOW ONE OF THE WEIGHTS IS FORMULATED. CAN YOU EXPLAIN WHAT APPEARS TO BE A DIFFERENCE IN THE FORMULATION OF THE RELATIVE WEIGHTINGS?

A. Rather than utilize the system load factor to define the relative weighting between energy and demand components, the NARUC Cost Manual presents an example that assigns each component as the ratio of the addition of demand and energy. In this manner, the NARUC example inappropriately restricts any energy weighting to no more than 50 percent of the relative weighting, regardless of how constant system loads are, and demand to no less than 50 percent.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE APPROPRIATE CLASSIFICATION OF COSTS RELATED TO PRODUCTION PLANT?

A. I recommend that the Commission reject the Company's proposal to classify all production plant assets as being 100 percent demand-related. The Company's proposal is inconsistent with customer demands placed on the Company's system,

[28] *See*, *Id.*, at 97.

inconsistent with the function generation serves as recognized by the Commission and other regulatory commissions in the past, and inconsistent with the historic cost allocation methodologies used by the Company and approved by the Commission which recognize dual generation functions. Instead, I recommend the Commission rely on the results of my alternative ACOSS which uses an A&P-12 CP method to classify production plant costs. My proposed A&P method classifies 74.78 percent of the Company's production plant costs as being energy-related, with the inverse (25.22 percent) being classified as demand related for the test year.

E. APPROPRIATE DEMAND MEASURE

Q. PLEASE DESCRIBE THE COMPANY'S PROPOSED DEMAND MEASURE FOR ITS ACOSS.

A. The Company classifies the non-variable costs associated with its production plant, transmission plant, and sub-transmission plant facilities as 100 percent demand-related and allocates these costs based on 6 CP.[29] The Company notes that it has relied on the 6 CP methodology in its last four base rate cases,[30] and that 6 CP continues to be the most appropriate demand allocator since its load profile during the test year reflects a peak period consisting of three summer and three winter months.[31]

Q. IS THE COMPANY'S ACOSS APPROACH CONSISTENT WITH ITS JCOSS APPROACH?

[29] Direct Testimony of Michael S. Small at 12:9-15; and 14:2-6.
[30] *Id.* at 5:3-5; and 12:18-22.
[31] *Id.* at 13:8-10.

A. No. The Company allocates non-variable costs associated with production, transmission, and sub-transmission plant in service between its three jurisdictions based on 12 CP.[32] While it is not required that cost allocation methodologies used in ACOSS and JCOSS be identical, the Company's use of different demand measures in its two cost of service studies is striking. It should be noted that the Federal Energy Regulatory Commission ("FERC"), which regulates transmission rates, generally relies on 12 CP to allocate costs associated with transmission plant.

Q. HAVE YOU EXAMINED HISTORIC MONTHLY PEAK DEMANDS RECORDED BY THE COMPANY?

A. Yes. Exhibit DED-5 shows historic Company monthly peak demands for the five-year period 2018 through 2022 as reported on the Company's annual FERC Form 1. This analysis shows that Company monthly peak demands are relatively consistent and thus the Company's load requirements are relatively flat throughout the year. Indeed, 12 CP is within 18 percent of the Company's annual system peak (i.e. 1 CP) in each year.

Q. ARE THERE ESTABLISHED TESTS TO EVALUATE THE APPROPRIATENESS OF A 12 CP DEMAND MEASURE?

A. Yes. FERC has historically utilized a series of three tests to evaluate the variability of a utility's system loads across the months of a calendar year. The first test, called the "On and Off-Peak Test," compares the difference between on-peak and off-peak months. A 12 CP system is defined as a system where the difference

[32] Direct Testimony of Jennifer C. Duncan at 10:9-10.

between these periods is 19 percent or less.[33] The second test, called the "Low-to-Annual Peak Test," evaluates annual variation in monthly system peaks by comparing the lowest monthly peak as a percentage of the overall annual system peak, or single coincident peak ("1 CP") demand. If the lowest monthly peak demand is 66 percent or greater when compared to the overall annual system peak, 12 CP is deemed the most appropriate demand measure.[34] Finally, the third test, called the "Average to Annual Peak Test," evaluates variation between average monthly peak demands and the overall annual system peak demand, in other words the difference between the 12 CP measure and a 1 CP measure. A finding that the 12 CP measure is 81 percent or greater of the 1 CP measure is considered to be indicative of a uniform demand system justifying the use of a 12 CP demand measure.[35]

Q. HAVE YOU REVIEWED THE COMPANY'S HISTORIC LOAD PATTERNS AND THEIR ADHERENCE TO THE PREVIOUS DISCUSSED FERC TESTS?

A. Yes. Exhibit DED-6 summarizes my application of the FERC tests for the five-year period 2018 through 2022. This analysis shows that the load characteristics of the Company's system satisfies all three of the FERC tests. Specifically, I find that 12 CP is a better match for the Company's load patterns under the first test than 6 CP for each of the five years examined. Likewise, analysis of FERC second test finds that 12 CP is a good fit for four of the five years 2018-2022, only failing when

[33] *See*, In the Matter of the Application of Duke Energy Progress, LLC For Authority to Adjust and Increase its Electric Rates and Charges; Public Service Commission of South Carolina Docket No. 2022-254-E; Direct Testimony of Janice Hager at 15:5-10.
[34] *Id.* at 15:11-16.
[35] *Id.* at 15:17 to 16:3.

examining 2020. Finally, the analysis of FERC's third test finds that 12 CP is a good fit for all five years, 2018-2022.

Q. IS 12 CP ESTIMATED TO BE A GOOD FIT FOR THE COMPANY'S OPERATIONS DURING THE 2024 TEST YEAR?

A. Yes. Exhibit DED-7 applies the three FERC tests to the Company's projected loads for the 2024 test year. This analysis shows that 12 CP meet all three tests, specifically being a better fit than the Company's proposed 6 CP for the test year.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE APPROPRIATE DEMAND MEASURE TO BE RELIED ON WHEN ALLOCATING NON-VARIABLE COSTS ASSOCIATED WITH COMPANY PRODUCTION, TRANSMISSION, AND SUB-TRANSMISSION PLANT?

A. I recommend the Commission reject the Company's proposed 6 CP demand measure in favor of a 12 CP demand measure. This would be consistent with the Company's own JCOSS methodology, and consistent with the quantitative results of the three FERC tests which find that 12 CP is a better fit for the Company's load profile over the past five years and as projected for the 2024 test year.

F. SUMMARY OF ACOSS FINDINGS

Q. PLEASE SUMMARIZE YOUR ACOSS FINDINGS.

A. Exhibit DED-8 presents the results of my alternative ACOSS which utilizes an A&P-12 CP cost allocation approach to allocate costs associated with production plant assets and a 12 CP cost allocation approach to allocate costs associated with transmission and sub-transmission assets. My alternative CCOSS analyses show that the Company's incorrect cost allocation of production, transmission, and sub-transmission plant assets skews the allocation of costs and revenue

responsibilities away from larger customers and onto residential and small commercial customers. I recommend that the Commission rely on the results of my alternative ACOSS as a fair and reasonable estimation of relative costs of service between Company customer classes.

IV. REVENUE DISTRIBUTION

Q. PLEASE EXPLAIN THE PURPOSE OF THE REVENUE DISTRIBUTION PROCESS IN SETTING RATES.

A. The revenue distribution process allocates a utility's overall revenue deficiency across customer classes, which in turn, is used to establish a new set of retail rates. The revenue distribution process often uses the results from the ACOSS as its starting point, but not necessarily as its ending point. Class-specific revenue responsibilities are established by allocating the system-wide revenue deficiency to classes that are under-earning, relative to their estimated rate of return ("ROR"), and assigning, at least in theory, revenue decreases to those classes that are over-earning relative to their CCOSS-estimated class returns. The final class revenue responsibilities are then used, in conjunction with each class's billing determinants, to determine rates. In summary, the revenue distribution process can be thought of as the initial step taken to establish rates.

Q. DOES THE REVENUE DISTRIBUTION PROCESS INCLUDE ANY POLICY CONSIDERATIONS?

A. Yes. Allocating the overall system-wide revenue deficiency entirely on a full cost of service basis can result in a very significant and adverse rate impact for certain under-earning classes. To avoid such a result, regulators often temper the revenue

responsibilities assigned to various customer classes in order to meet a set of broad ratemaking policy goals.

Q. WHAT ARE THOSE BROADER RATEMAKING POLICY GOALS?

A. There are several generally accepted rate-making principles used in utility regulation that include:

1) Rates should be fair, just, and reasonable, and not unduly discriminatory.
2) To the extent possible, gradualism should be used to protect customers from rate shock.
3) Rate continuity should be maintained.
4) Rates should be informed by costs, but class cost of service results need not be the only factor used in rate development.
5) Rates should be understandable to customers.

Q. HOW ARE THE ABOVE PRINCIPLES APPLIED IN DEVELOPING RATES FOR A REGULATED UTILITY?

A. It is important to consider all of the principles I mentioned above. However, any principle's relative weight can change depending upon the importance of certain policy goals. Rate design should strike a balance between policy goals and resulting rates that are fair, just, and reasonable. There is no pre-set or universally accepted formula for developing rates and, as a result, sound judgment is necessary to formulate a rate design that meets these objectives.

Q. PLEASE EXPLAIN HOW THE COMPANY PROPOSES TO DISTRIBUTE ITS CLASS REVENUE REQUIREMENTS.

A. The Company states that its objective in allocating revenues between its customer classes was to meet three objectives including ensuring that rates are affordable

and competitive across residential, commercial, and industrial customer classes.[36] First, the Company's proposed allocation was intended to reflect cost causation as nearly as possible.[37] Second, the Company's proposed allocation was constructed in a manner that moved all classes to an equalized rate of return and eliminating inter-class revenue subsidies.[38] Finally, the Company's proposed allocation incorporated the principle of gradualism when determining individual customer class revenue increases.[39] The Company states that it mitigated cost-of-service based revenue increases such that no class received a total revenue increase, defined as base rates plus riders, greater than 9.35 percent or a less than 3.2 percent.[40] Exhibit DED-9 presents the Company's estimated current class relative rates of return ("RROR") and its proposed revenue distribution.

Q. WHAT DO YOU MEAN BY A RROR?

A. The RROR effectively standardizes the class-specific rate of return estimated by an ACOSS to the overall system average. In other words, it divides the estimated class ROR by the estimated system ROR. For instance, assume that the residential class is earning a class-specific eight percent ROR, and further assume that the system-wide average ROR estimated by the same ACOSS is also eight percent. The residential class, in this example, can be said to be earning a 1.0 RROR if the estimated ROR is the same as the overall system (*i.e.*, eight percent divided by eight percent equals 1.0). Put another way, any class earning a 1.0

[36] Direct Testimony of Jenifer L. Fischer at 8:19-23.
[37] *Id.* at 8:23 to 9:2.
[38] *Id.* at 9:2-4.
[39] *Id.* at 9:4-5.
[40] *Id.* at 9:6-8.

RROR can be said to be making its full contribution to the system's overall ROR (*i.e.*, there is no cross-subsidy). A RROR that is greater than 1.0 indicates that a particular class is contributing more than the system average contribution to the Company's overall return. Likewise, a class that earns a RROR less than 1.0 but greater than zero can be said to be making a less-than-average contribution to the overall system.

Q. DO YOU AGREE THAT A CLASS RROR LESS THAN 1.0 IS PROBLEMATIC OR INEQUITABLE?

A. Not necessarily. Consistent with the principles identified above, there may be policy reasons to support a result that reflects an inequitable cross-subsidization. For example, the presence and/or continuation of a RROR below 1.0 could be the result of a prior agreed-upon rate freeze that prevents class rates from increasing to correct the revenue deficiency (relative to cost of service). In this example, the presence of a RROR below 1.0 is simply a function of a prior policy decision, not necessarily the result of some arbitrary or intentionally designed inequity.

Q. WHAT ARE THE CLASS RATE INCREASES UNDER THE COMPANY'S PROPOSED REVENUE DISTRIBUTION?

A. The Company proposes to increase base rates by 9.96 percent on a system-wide average basis, which amounts to a 7.21 percent increase in total revenues when considering existing rider revenues and proposed changes in riders. However, under the Company's proposed revenue distribution, residential customers would

receive a 9.35 percent increase in total rates, 1.30 times the proposed system average increase of 7.21 percent.[41]

Q. DO YOU AGREE WITH THE COMPANY'S PROPOSED REVENUE DISTRIBUTIONS?

A. No. The Company's proposed revenue distributions suffer from two major deficiencies. First, the Company's proposal is based on the results of a faulty ACOSS that overstates the extent of any current subsidy from high-load factor industrial customers to low-load factor residential and small commercial customers. Second, the Company's proposed cap on proposed rate increases is equivalent to approximately 1.3 times the proposed system average rate increase and is inconsistent with rate gradualism.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE DISTRIBUTION?

A. I recommend that the Commission adopt a more reasonable revenue distribution allocation method based on my alternative ACOSS results that also limits the rate increase to any single customer class to 1.15 times the overall system average increase. This reduces the maximum total revenue increase of any single rate class to 8.30 percent, compared to the Company's proposed maximum rate increase of 9.35 percent.

Q. HAVE YOU PREPARED A SUMMARY OF THE EFFECTS OF YOUR PROPOSED REVENUE DISTRIBUTION?

[41] Direct Testimony of Jenifer L. Fischer, Attachment JLF-2.

A. Yes. Exhibit DED-10 presents an illustrative summary of the effects of my proposed revenue distribution under the Company's proposed system average rate increase of 7.21 percent. My proposed revenue distribution would increase base rates for the residential class by 7.34 percent, compared to the Company's proposal which would increase such rates by 9.35 percent.

V. RATE DESIGN

A. CUSTOMER CHARGES

Q. HOW SHOULD POLICY BALANCE COST ASSIGNMENTS BETWEEN CUSTOMER CHARGES AND VOLUMETRIC RATES?

A. Modern utility pricing theory is primarily concerned with the development of optimal tariff design, which over the years has become dominated by a form of pricing referred to as a "two-part tariff," sometimes referred to more technically as a non-linear (or non-uniform) pricing approach. Once a class revenue requirement is established, the goal for regulators should be one that sets the most appropriate rates based upon various efficiency and equity considerations. Balancing the weight of how costs are recovered between fixed rates, variable rates, block rates, and seasonal rates are all integrated parts of that process.

Q. WHAT IS THE APPROPRIATE ROLE OF COSTS IN SETTING RATES FOR A TWO-PART TARIFF?

A. Costs can be instructive in establishing a baseline upon which prices may be set, but costs do not need to serve as the sole or exclusive basis for rates in order for them to be set optimally (*i.e.,* fixed charges do not need to strictly equal fixed costs, variable rates need not strictly equal variable costs). Unfortunately, the "fixed

charge-equals-fixed cost" philosophy gets repeated so often that it can often drown out meaningful discussions about other equally important considerations in setting rates in imperfect markets. In fact, appropriate rate setting in the context of a two-part tariff typically has more to do with consumer demand than it does with cost.

Q. PLEASE DISCUSS THE COMPANY'S CUSTOMER CHARGE PROPOSALS.

A. Exhibit DED-11 presents a summary of the Company's proposed increases in monthly customer charges for residential and general service ("GS") customer classes. The Company proposes to increase the standard residential customer charge from $14.79 to $17.50 per month, or by approximately 18.3 percent.[42] The Company argues that this increase is needed since the current residential customer charge recovers all customer-related costs, but only a portion of demand-related costs, and thus requires improvements to align with the Company's cost of service.[43] The Company also proposes to increase its current customer charge for GS from the current $24.65 per month to $29.00 per month, a 17.6 percent increase.[44]

Q. HAVE YOU PREPARED AN ANALYSIS OF COMMON CUSTOMER-RELATED COSTS TO CURRENT CUSTOMER CHARGES?

A. Yes, and this analysis is provided in Exhibit DED-12. Customer-related costs included in this analysis include: a return of and on electric meters and service drops; meter operating expenses (i.e., removing and setting meters); meter maintenance expenses; and customer account expenses such as meter reading

[42] Direct Testimony of Jenifer L. Fischer at 13:5-9.
[43] *Id.* at 13:4-6.
[44] Direct Testimony of Jenifer L. Fischer, Attachment JLF-4.

expenses, customer records expenses and customer billing and accounting expenses. The analysis shows that residential and the small general service ("GS") rate classes fully recover customer-related expenses through the current customer charge. In fact, the residential and secondary GS rate classes currently recover 121.2 and 161.6 percent, respectively, of customer-related expenses through current customer charges. This result does not demonstrate a need to increase residential and small commercial customer charges on a cost-causation basis.

Q. HAVE YOU COMPARED THE COMPANY'S PROPOSED RESIDENTIAL CUSTOMER CHARGES TO OTHER REGIONAL ELECTRIC UTILITIES?

A. Yes, and this analysis is presented in Exhibit DED-13, which surveys current residential and small commercial customer charges for major electric utility companies operating in Indiana and surrounding states. The Company's current residential customer charge of $14.79 per month is above the average residential customer charge of $9.91 for other regional utilities. Indeed, the Company's current Indiana residential customer charge is more than double its current customer charge for similar service in its Michigan service territory of $7.25 per month. The Company's proposed residential customer charge of $17.50 per month would be tied with Kentucky Power Company as the highest residential customer charge in the region.

Q. HAVE YOU COMPARED THE COMPANY'S SMALL COMMERCIAL CUSTOMER CHARGE TO OTHER REGIONAL ELECTRIC UTILITIES?

A. Yes. The Company's current small commercial customer charge of $24.65 per month is above the average commercial customer charge of $19.12 for other

regional utilities. Similar to the regional comparison of residential customer charges, the Company's small commercial customer charge in Indiana is significantly greater than the current customer charge for similar service in its Michigan service territory of $17.65 per month.

Q. IS THE COMPANY'S PROPOSAL TO INCREASE ITS RESIDENTIAL AND COMMERCIAL CUSTOMER CHARGES CONSISTENT WITH THE PROMOTION OF ENERGY EFFICIENCY AND CONSERVATION?

A. No. The Company's rate design proposal is inconsistent with energy efficiency since it reduces economic incentives for ratepayers to control monthly utility bills through energy efficiency and conservation efforts, because only the variable component of bills is avoidable.

Q. HAVE OTHER REGULATORS RECOGNIZED THE NEGATIVE IMPACTS THAT CUSTOMER CHARGE INCREASES CAN HAVE FOR ENERGY EFFICIENCY?

A. Yes. In rejecting a request by Baltimore Gas and Electric ("BGE") to increase customer charges as part of a larger rate design proposal, the Maryland Public Service Commission ("MD PSC") recognized the need to allow customers the opportunity to control their monthly bills by reducing energy usage.

> Even though this issue was virtually uncontested by the parties, we find we must reject Staff's proposal to increase the fixed customer charge from $7.50 to $8.36. Based on the reasoning that ratepayers should be offered the opportunity to control their monthly bills to some degree by controlling their energy usage, we instead adopt the Company's proposal to achieve the entire revenue requirement increase through volumetric and demand charges. This approach also is

consistent with and supports our EmPOWER Maryland goals.[45]

Q. CAN YOU POINT TO ANY OTHER REGULATORY EXAMPLES?

A. Yes. The Montana Public Service Commission ("MT PSC") previously rejected a proposed straight fixed variable rate design for Energy West Montana citing several reasons, including the impact of the proposal on energy conservation efforts. MT PSC stated in its decision that:

> The Commission agrees that most distribution costs are not avoidable, and that volumetric distribution charges may encourage conservation actions that, all other things being equal, reduce the utility's embedded cost recovery between rate cases and contribute to future rate increases.
>
> …
>
> The Commission agrees that an SFV rate design is a clean and administratively inexpensive way to decouple revenue from volume. An often-cited public policy justification for revenue decoupling is to remove the volume disincentive for cost-effective conservation investment by a gas distribution company, which through SFV and other decoupling methods is rendered indifferent to the volume of gas consumed. Yet, SFV rates decouple revenue at the cost of decreasing returns to conservation investment by customers. For this reason the net conservation benefit of revenue decoupling via SFV rates is not clear, and may be negative.[46]

Q. ARE THERE OTHER REGULATORY EXAMPLES IN WHICH A COMMISSION REJECTED A PROPOSED INCREASE IN FIXED CUSTOMER CHARGES DUE TO THE DETRIMENTAL EFFECT ON EFFORTS TO CONSERVE ELECTRICITY?

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[45] Maryland Public Service Commission Case No. 9299, In the Matter of the Application of Baltimore Gas and Electric Company for Adjustment in its Electric and Gas Base Rates (*"Case No. 9299")*. Order No. 85374 at p. 99, rel. February 22, 2013.

[46] *In The Matter Of Energy West Montana, Application To Establish Increased Service Rates In Its Great Falls, Cascade, And West Yellowstone Service Areas*, Montana Public Service Commission, Docket No. D2010.9.90, Order No, 7132c, at 29–30.

A. Yes. In 2012, the Missouri Public Service Commission ("MO PSC") rejected Ameren Missouri's proposed increase in customer charge for residential and small service classes. The Commission expressed opposition to shifting costs from volumetric rates to fixed customer charges because it would send the erroneous message to customers that the Commission is discouraging efforts to conserve electricity:

> Shifting customer costs from variable volumetric rates, which a customer can reduce through energy efficiency efforts, to fixed customer charges, that cannot be reduced through energy efficiency efforts, will tend to reduce a customer's incentive to save electricity. Admittedly, the effect on payback periods associated with energy efficiency efforts would be small, but increasing customer charges at this time would send exactly [the] wrong message...[47]

Q. IS THERE A RECENT EXAMPLE OF A REGULATORY COMMISSION REJECTING A PROPOSED INCREASE IN RESIDENTIAL AND SMALL COMMERCIAL CUSTOMER CHARGES?

A: Yes. In rejecting a request by Northern States Power Company to increase customer charges[48] as part of a larger rate design proposal, the Minnesota Public Utilities Commission ("MPUC") recognized the need to allow customers the opportunity to control their monthly bills by reducing energy usage.

> Monthly customer charges are an important component of the Company's Residential and Small General Service rates by facilitating recovery of the costs caused by each customer that do not vary with the amount of energy used. However, higher fixed customer charges discourage customers from conserving energy and investing in renewable energy by

[47] Missouri Public Service Commission, Report and Order, In the Matter of Union Electric Company Tariff to Increase Its Annual Revenues for Electric Service, File No. ER-2012-0166, December 12, 2012, pages 110-111.

[48] I*n re the Appl. of Northern States Power Co., for Authority to Increase Rates for Elec. Serv. in the State of Minn*., Docket E-002/GR-21-630, Findings of Fact, Conclusions, and Order, at 114 (MPUC July 17, 2023).

> reducing the impact of these efforts on the customers' bills. Customer charges also tend to confuse and alienate customers by impairing customer understanding of their energy bills. The Commission notes that Minn. Stat. §216B.03 requires the Commission to design rates to encourage energy conservation and renewable-energy use to "the maximum reasonable extent." Considering this statutory mandate and the evidence submitted by the parties, the Commission agrees with the ALJ that it is reasonable and appropriate to lower the monthly customer charge for the Residential and Small General Service classes to $ 6.00.[49]

Q. ARE THESE COMMISSIONS ALONE IN THEIR BELIEF THAT HIGH FIXED CHARGES DISCOURAGE EFFICIENT USE OF ENERGY?

A. No. A research document presented for consideration by the membership of the National Association of Regulatory Utility Commissioners ("NARUC") lists a straight-fixed variable ("SFV") rate design as an alternative to decouple utility revenue from sales. An SFV places all fixed costs into fixed charges while relegating only variable costs to volumetric rates. The Company's current customer charge proposal, which attempts to recover an additional level of class revenue responsibilities through the customer charge, regardless of costs, could be thought of as a pricing proposal consistent with these SFV principles. However, the NARUC research noted this type of rate design was problematic because of its effects on customer incentives to conserve energy:

> **Straight-Fixed Variable Rate Design.** This mechanism eliminates all variable distribution charges and costs are recovered through a fixed delivery services charge or an increase in the fixed customer charge alone. With this approach, it is assumed that a utility's revenues would be unaffected by changes in sales levels if all its overhead or fixed costs are recovered in the fixed portion of customers' bills. <u>This approach has been criticized for having the unintended effect of reducing customers' incentive to use less</u>

[49] *Id*. at 116-117.

> electricity or gas by eliminating their volumetric charges and billing a fixed monthly rate, regardless of how much customers consume.[50]

Q. HAS ANY NATIONAL PUBLIC POLICY ANALYSIS NOTED THE EFFICIENCY DISINCENTIVES ASSOCIATED WITH SFV-TYPE RATE DESIGNS?

A. Yes. The National Action Plan for Energy Efficiency ("NAPEE"), a joint venture of the U.S. Department of Energy and U.S. Environmental Protection Agency, published a whitepaper on various rate design effects on encouraging energy efficient behaviors. The NAPEE postulated that SFV had a detrimental effect on economic signals to encourage customers to change energy usage behavior and investments in energy efficiency devices, and specifically noted that such disincentives persist even when applied to individual components of a customer's utility bill, such as SFV for strictly distribution services:

> Because [SFV] tends to shift costs out of volumetric charges, it tends to reduce customers' efficiency incentive, because the marginal price of additional consumption is reduced. While SFV rates are being considered to better reflect the utility's costs behind the rate, these rates do not encourage customers to change energy usage behavior or invest in efficiency technologies. Such customer disincentives persist even when SFV rates are applied to individual components of the bill, such as charges for distribution service.[51]

Q. CAN HIGH CUSTOMER CHARGES LEAD TO OTHER PROBLEMS?

A. Yes. In addition to disincentivizing energy efficiency, increased customer charges also shift the rate burden within a customer class to lower-use customers. This

[50] "Decoupling for Electric & Gas Utilities: Frequently Asked Questions (FAQ)" Grants & Research Department, National Association of Regulatory Utility Commissioners, at 5 (Sept. 2007) (emphasis added), https://www.maine.gov/mpuc/legislative/archive/2006legislation/DecouplingRpt-AttachC.pdf.

[51] Customer Incentives for Energy Efficiency Through Electric and Natural Gas Rate Design, National Action Plan for Energy Efficiency at 13-14, prepared by William Prindle, ICF International, Inc. (Sept. 2009) (emphasis added), https://www.epa.gov/sites/production/files/2015-08/documents/rate_design.pdf.

results in equity concerns as lower-use customers have been shown to be associated with lower-income households in empirical research.[52]

Q. WHAT ARE YOUR CUSTOMER CHARGE RECOMMENDATIONS AND CONCLUSIONS?

A. I recommend the Commission reject the Company's proposed increase in customer charges. The Company's proposal would detrimentally impact the public policy goals of promoting energy efficiency. Likewise, it would burden low-use customers with a greater than average portion of any proposed increase in the case.

B. RIDER RATES

Q. ARE THERE OTHER RATE DESIGN ISSUES IN THE CURRENT PROCEEDING?

A. Yes. The Company in its filing provides updated rate schedule factor computations for its riders based on its proposed rider revenue requirements and proposed cost allocations in the current proceeding.[53] As discussed in an earlier section of this testimony, the Company's proposed cost allocations in the current proceeding rely on an inappropriate demand measure based on relative contribution to 6 CP rather than a more appropriate 12 CP. This error contributes to an inaccurate proposed rider rates for the Company's ECR, OSS_PJM, and SPR.

[52] *See,* 2020 Residential Energy Consumption Survey ("RECS"), U.S. Energy Information Administration; *See also,* Kontokosta, Constantine, *et. al.* (2020), "Energy Cost Burdens for Low-Income and Minority Households," *Journal of the American Planning Association*, Vol. 86 no. 1; and Brown, Marilyn A, *et. al.* (March 2020), "Low-Income Energy Affordability: Conclusions from a Literature Review," Oak Ridge National Laboratory.

[53] Direct Testimony of Jenifer L. Fischer at 24:3-13.

Q. HAVE YOU CALCULATED UPDATED PROPOSED RIDER RATES FOR THE COMPANY'S ECR, OSS_PJM, AND SPR RIDERS?

A. Yes. Exhibit DED-14 presents a comparison of the Company's proposed rider rates for the three riders in question and recommended alternatives based on an appropriate 12 CP demand measure. Notable, Exhibit DED-14 is presented for illustrative purposes based on the Company's proposed rider revenue requirements; however, in general, the Company's proposed rider revenue rates tend to shift the allocation of rider responsibility away from larger customers and onto residential and small commercial customers.

Q. HAVE YOU CALCULATED NEW TDSIC ALLOCATIONS IN THE CURRENT PROCEEDING?

A. Yes. Exhibit DED-15 presents a comparison of the Company's proposed TDISC distribution and transmission allocations and alternative recommended allocations. The OUCC's position is that I&M does not need separate allocators for any TDSIC case it might file, and that the base rate allocators should apply. However, should the Commission choose to proceed with alternate allocators, it should use those in Exhibit DED-15. The alternative recommended TDISC allocations are based on the results of my recommended ACOSS, which provides fair and reasonable estimation of relative costs of service between Company customer classes.

VI. SERVICE FEES

Q. DOES THE COMPANY PROPOSE ANY CHANGES TO ITS EXISTING TERMS AND CONDITIONS OF SERVICE?

A. Yes. The Company proposes several modifications to the table of contents and terms and conditions sections of its tariff.[54] Many of these changes are clerical in nature and relatively non-controversial. Importantly, however, the Company proposes to update its service charges for reconnection of service, and customer trip charges.[55]

Q. HAVE YOU REVIEWED THE COMPANY'S PROPOSED CHANGES TO ITS SERVICE CHARGES?

A. Yes. These proposed changes are summarized in Exhibit DED-16. As shown in Exhibit DED-16, the Company proposes sizable increases in many of its eleven service charges, including a 21 percent increase in reconnection fees for customers who have chosen to opt-out of advanced metering instruments ("AMI") service, a 41 percent increase in reconnection fees for underground service, and a 110 percent increase in the fee for no power service call when the customer is determined to be at fault.

Q. WHAT IS MOTIVATING THE COMPANY'S PROPOSED CHANGES TO ITS SERVICE CHARGES?

A. The Company states that it periodically reviews costs to perform relevant service tasks to ensure that service costs are correctly reflecting current costs.[56] After evaluating the costs associated with each of its eleven service charges, it determined that nine such charges needed to be increased while one, trip to leave

[54] Direct Testimony of Kurt C. Cooper at 5:10-23.
[55] *Id.* at 6:9, and page 7, figure KCC-1.
[56] Direct Testimony of Kurt C. Cooper at 6:11-14.

notice for AMI opt-out customers, required a minor decrease.[57] The Company decided not to change its service charge for non-sufficient funds bank notices.

Q. DID THE COMPANY SEE SIGNIFICANT SERVICE CHARGES DURING THE 2022 HISTORIC YEAR?

A. No. In fact, for its four service charges covering reconnection of service to AMI opt-out customers, the Company had only one request during 2022 – a reconnection of service during regular business hours. Likewise, the Company had only 1,448 reconnection of service requests from non-AMI-opt out customers during 2022. Most – 1,413 – were requests for reconnection of service at the pole during regular business hours.[58]

Q. THE COMPANY PROPOSES TO SIGNIFICANTLY INCREASE CERTAIN SERVICE CHARGES. DID THESE SERVICE CHARGES SEE SIGNIFICANT ACTIVITY DURING THE 2022 HISTORIC YEAR?

A. No. While the Company in general saw relatively little activity requiring service charges, many of the charges to which the Company proposes significant increases saw very little to no activity in 2022. For example, the Company proposes a 41 percent increase in its reconnection fee for underground service, yet the Company saw no such service request in 2022. Likewise, the Company proposes a 75 percent increase in the pole reconnection fee during Sundays and holidays, yet the Company saw only six such requests during the entirety of 2022.[59]

[57] *Id.* at 15-18.
[58] Direct Testimony of Kurt C. Cooper at 7, Figure KCC-1.
[59] *Id.*

Q. WHAT IS THE EXPECTED REVENUE IMPACT OF THE COMPANY'S PROPOSED INCREASES IN ITS SERVICE CHARGES BASED ON 2022 ACTIVITY?

A. The Company estimates an additional $105,565 annually due to its proposed increase in service charges based on 2022 activity. 57.6 percent of this is expected to accrue from its proposed 36 percent increase in pole reconnection fees during normal business hours; while 39 percent is expected to accrue from its proposed 110 percent increase in the fee for no power service call when the customer is determined to be at fault.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSAL TO MODIFY ITS SERVICE FEES?

A. I recommend the Commission reject the Company's proposal to modify its service fees in the current proceeding. The Company's proposal is a solution in search of a problem. The Company has not experienced significant service requests in recent years to justify its proposed increases in service fees, some of which it proposes to more than double. OUCC Witness Brian Latham reflects a $105,565 revenue decrease to account for my recommendation to reject service fee increases.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES TO INCREASE THE COMPANY'S SERVICE FEES?

A. Yes. If, in the alternative, should the Commission allow an increase to the Company's service fees, I recommend that the Commission set this increase at no

more than the general rate of inflation, as measured by the GDP-PI, for the time period since the Company's last general rate case.

VII. CONCLUSIONS AND RECOMMENDATIONS

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED JCOSS?

A. I recommend the Commission approve the Company's JCOSS, as it is a reasonable representation of the relative cost of service for the Company's Indiana service territory relative to its other service territories.

Q. PLEASE SUMMARIZE YOUR ACOSS FINDINGS.

A. I find that the Company's ACOSS incorrectly classifies fixed costs associated with production plant assets as exclusively demand-related. This is inconsistent with the role these production/generation assets play in serving the Company's system requirements, and deviates from commonly accepted cost allocation practices. I also find that the Company's use of 6 CP is inconsistent with the operational demands placed on the Company's system and skews the allocation of costs and revenue responsibilities away from larger customers onto residential and small commercial customers. I instead recommend the Commission use 12 CP as the appropriate demand measure for the Company.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE DISTRIBUTION?

A. I recommend that the Commission adopt a more reasonable revenue distribution allocation method based on my alternative ACOSS results that also limits the rate increase to any single customer class to 1.15 times the overall system average

increase. This reduces the maximum total revenue increase of any single rate class to 8.30 percent, compared to the Company's proposed maximum rate increase of 9.35 percent.

Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE COMPANY'S PROPOSAL TO INCREASE CUSTOMER CHARGES IN THE CURRENT PROCEEDING?

A. I recommend the Commission reject the Company's proposed increase in customer charges. The Company's proposal would detrimentally impact the public policy goals of promoting energy efficiency. Likewise, it would burden low-use customers with a greater than average portion of any proposed increase in the case.

Q. HAVE YOU PREPARED UPDATED RIDER RATES IN THE CURRENT PROCEEDING?

A. Yes. Exhibit DED-14 presents an illustrative comparison of the Company's proposed rider rates for the Environmental Cost Rider ("ECR"), Off-System Sales Margin and PJM Cost Rider ("OSS_PJM"), and Solar Power Rider ("SPR"), based on an appropriate 12 CP demand measure. Likewise, Exhibit DED-15 presents a comparison of the Company's proposed Transmission and Distribution System Improvement Charge ("TDISC") based on the results of my recommended ACOSS. In general, the Company's proposed rider revenue rates inappropriately shift the allocation of rider responsibility from larger customers onto residential and small commercial customers.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSAL TO MODIFY ITS SERVICE FEES?

A. I recommend the Commission reject the Company's proposal to modify its service fees in the current proceeding. The Company's proposal is a solution in search of a problem. The Company has not experienced significant service requests in recent years to justify its proposed increases in service fees, some of which it proposes to more than double.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES TO INCREASE THE COMPANY'S SERVICE FEES?

A. Yes. If, in the alternative, should the Commission allow an increase to the Company's service fees, I recommend that the Commission set this increase at no more than the general rate of inflation, as measured by the GDP-PI, for the time period since the Company's last general rate case.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

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EDUCATION

Ph.D., Economics, Florida State University, 1995.
M.S., Economics, Florida State University, 1992.
M.S., International Affairs, Florida State University, 1988.
B.A., History, University of West Florida, 1987.
A.A., Liberal Arts, Pensacola State College, 1985.

Master's Thesis: *Nuclear Power Project Disallowances: A Discrete Choice Model of Regulatory Decisions*

Ph.D. Dissertation: *An Empirical Examination of Environmental Externalities and the Least-Cost Selection of Electric Generation Facilities*

ACADEMIC APPOINTMENTS

Louisiana State University, Baton Rouge, Louisiana

Center for Energy Studies

2023-Current	Professor Emeritus
2014-2023	Executive Director (Retired in 2023)
2007-2023	Director, Division of Policy Analysis
2006-2023	Professor
2003-2014	Associate Executive Director
2001-2006	Associate Professor
1999-2001	Research Fellow and Adjunct Assistant Professor
1995-2000	Assistant Professor

College of the Coast and the Environment (Department of Environmental Studies)

2014-2023	Professor (Joint Appointment with CES)
2010-2023	Director, Coastal Marine Institute
2010-2014	Adjunct Professor

E.J. Ourso College of Business Administration (Department of Economics)

2006-2023	Adjunct Professor
2001-2006	Adjunct Associate Professor
1999-2000	Adjunct Assistant Professor

Michigan State University, East Lansing, Michigan

Institute of Public Utilities

2018-Current Senior Fellow

Florida State University, Tallahassee, Florida

College of Social Sciences, Department of Economics

1995 Instructor

PROFESSIONAL EXPERIENCE

Acadian Consulting Group, Baton Rouge, Louisiana

2001-Current Consulting Economist/Principal
1995-1999 Consulting Economist/Principal

Econ One Research, Inc., Houston, Texas

1999-2001 Senior Economist

Florida Public Service Commission, Tallahassee, Florida

Division of Communications, Policy Analysis Section

1995 Planning & Research Economist

Division of Auditing & Financial Analysis, Forecasting Section

1993 Planning & Research Economist
1992-1993 Economist

Project for an Energy Efficient Florida/FlaSEIA, Tallahassee, Florida

1994 Energy Economist

Ben Johnson Associates, Inc., Tallahassee, Florida

1991-1992 Research Associate
1989-1991 Senior Research Analyst
1988-1989 Research Analyst

GOVERNMENT & ADVISORY APPOINTMENTS

2023 – Current Distinguished Fellow & Senior Economist
Institute For Energy Research
Washington, D.C.

2017 -- Current Member, National Petroleum Council.
U.S. Department of Energy.

2020-2023 Co-Chairperson, Energy Advisory Committee, World Trade Center New Orleans, Louisiana.

2007-2023 Louisiana Representative, Interstate Oil and Gas Compact Commission; Energy Resources, Research & Technology

	Committee.
2007-2023	Louisiana Representative, University Advisory Board Representative; Energy Council (Center for Energy, Environmental and Legislative Research).
2005	Member, Task Force on Energy Sector Workforce and Economic Development (HCR 322).
2003-2005	Member, Energy and Basic Industries Task Force, Louisiana Economic Development Council
2001-2003	Member, Louisiana Comprehensive Energy Policy Commission.

PUBLICATIONS: BOOKS AND MONOGRAPHS

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2. *Power System Operations and Planning in a Competitive Market*. (2002). With Fred I. Denny. New York: CRC Press. Pp. 133.
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3. "Current Trends and Issues in Reforming State-level Solar Net Energy Metering Policies." (2020). *Journal of Energy Law and Resources*. Vol. VIII: 419-451.
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5. "Understanding the challenges of industrial carbon capture and storage: An example in a U.S. petrochemical corridor." (2019). With Michael Layne and Brian Snyder. *International Journal of Sustainable Energy* 38(1):13-23.
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7. "Understanding the challenges of industrial carbon capture and storage: an example in a U.S. petrochemical corridor." (2018). With Brian Snyder and Michael Layne. *International Journal of Sustainable Energy*. 38(1):1-11

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10. "Modeling the impacts of sea-level rise, oil price, and management strategy on the costs of sustaining Mississippi delta marshes with hydraulic dredging." (2018). with Adrian R.H. Wiegman, John W. Day, Christopher F. D'Elia, Jeffrey S. Rutherford, James T. Morris, Eric D. Roy, Robert R. Lane, and Brian F. Snyder. *Science of the Total Environment* 618 (2018): 1547-1559.

11. "Identifying Vulnerabilities of Working Coasts Supporting Critical Energy Infrastructure." (2016). With Siddhartha Narra. *Water*. 8(1).

12. "Economies of Scale, Learning Effects and Offshore Wind Development Costs" (2015). With Gregory B. Upton, Jr. *Renewable Energy*. 61-66.

13. "Economic impact of Gulf of Mexico ecosystem goods and services and integration into restoration decision-making." (2014) With Shepard, A.N., J.F. Valentine, C.F. D'Elia, D.W. Yoskowitz. *Gulf Science*.

14. "An Empirical Analysis of Differences in Interstate Oil and Natural Gas Drilling Activity." (2012). With Mark J. Kaiser and Christopher J. Peters. *Exploration & Production: Oil and Gas Review*. 30(1): 18-22.

15. "The Value of Lost Production from the 2004-2005 Hurricane Seasons in the Gulf of Mexico." (2009). With Mark J. Kaiser and Yunke Yu. *Journal of Business Valuation and Economic Loss Analysis*. 4(2).

16. "Estimating the Impact of Royalty Relief on Oil and Gas Production on Marginal State Leases in the US." (2006). With Jeffrey M. Burke and Dmitry V. Mesyanzhinov. *Energy Policy* 34(12): 1389-1398.

17. "Using Competitive Bidding As A Means of Securing the Best of Competitive and Regulated Worlds." (2004). With Tom Ballinger and Elizabeth A. Downer. *NRRI Journal of Applied Regulation.* 2 (November): 69-85. (*Received 2005 Best Paper Award by NRRI*).

18. "Deregulation of Generating Assets and the Disposition of Excess Deferred Federal Income Taxes." (2004). With K.E. Hughes II. *International Energy Law and Taxation Review*. 10 (October): 206-212.

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25. "Capacity and Economies of Scale in Electric Power Transmission" (1999). With Robert F. Cope and Dmitry Mesyanzhinov. *Utilities Policy* 7: 155-162.

26. "Oil Spills, Workplace Safety, and Firm Size: Evidence from the U.S. Gulf of Mexico OCS." (1997). With O. O. Iledare, A. G. Pulsipher, and Dmitry Mesyanzhinov. *Energy Journal* 4: 73-90.

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Electric Power Industry" (1998). With Fred I. Denny. *IEEE Proceedings: Large Engineering Systems Conference on Power Engineering*. June: 294-298.

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6. "Analysis of the Economic Impact Associated with Oil and Gas Activities on State Leases." (2002). With Dmitry Mesyanzhinov, Robert H. Baumann, and Allan G. Pulsipher. *Proceedings of the 2002 National IMPLAN Users Conference*: 149-155.

7. "Do Deepwater Activities Create Different Impacts to Communities Surrounding the Gulf OCS?" (2001). *Proceedings of the International Association for Energy Economics: 2001: An Energy Odyssey?* April.

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10. "Asymmetric Choice and Customer Benefits: Lessons from the Natural Gas Industry." (1999). With Rachelle F. Cope and Dmitry Mesyanzhinov. *Proceedings of the International Association for Energy Economics: The Only Constant is Change* August: 444-452.

11. "Modeling Electric Power Markets in a Restructured Environment" (1998). With Robert F. Cope and Dan Rinks. *Proceedings of the International Association for Energy Economics: Technology's Critical Role in Energy and Environmental Markets*. October: 48-56.

12. "Assessing Environmental and Safety Risks of the Expanding Role of Independents in E&P Operations on the Gulf of Mexico OCS." (1996). With Allan Pulsipher, Omowumi Iledare, Bob Baumann, and Dmitry Mesyanzhinov. *Proceedings of the 16th Annual Information Transfer Meeting*. U.S. Department of Interior, Minerals Management Service: New Orleans, Louisiana: 162-166.

13. "Comparing the Safety and Environmental Performance of Offshore Oil and Gas Operators." (1995). With Allan Pulsipher, Omowumi Iledare, Dmitry Mesyanzhinov, William Daniel, and Bob Baumann. *Proceedings of the 15th Annual Information Transfer Meeting*. U.S. Department of Interior, Minerals Management Service: New Orleans, Louisiana.

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1. "The Role of Distributed Energy Resources in a Restructured Power Industry." (2006). In *Electric Choices: Deregulation and the Future of Electric Power*. Edited by Andrew N. Kleit. Oakland, CA: The Independent Institute (Rowman & Littlefield Publishers, Inc.), 181-208.

2. "The Road Ahead: The Outlook for Louisiana Energy." (2006). In *Commemorating Louisiana Energy: 100 Years of Louisiana Natural Gas Development*. Houston, TX: Harts Energy Publications, 68-72.

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16. *Principal Investigator*. Examining Louisiana's Industrial Carbon Sequestration Potential. Phase 2: Follow-up and estimation. (2016). With Brian F. Snyder. Southern States

Energy Board. Total Project: $69,990, three months. Status: Completed.

17. *Principal Investigator*. Examining Louisiana's Industrial Carbon Sequestration Potential. Phase 1: Scoping and Identification. (2016). With Brian F. Snyder. Southern States Energy Board. Total Project: $29,919, three months. Status: Completed.

18. *Principal Investigator*. Energy efficiency building codes for Louisiana. (2016). With Brian F. Snyder. Louisiana Department of Natural Resources. Total Project: $50,000, one year. Status: Completed.

19. *Principal Investigator*. An update of Louisiana's combined heat and power potentials, current utilizations, and barriers to improved operating efficiencies. (2016). Louisiana Department of Natural Resources. Total Project: $90,000, one year. Status: Completed.

20. *Principal Investigator*. Combined Heat and Power Stakeholder Meeting. (2016). Southeastern Energy Efficiency Council. Total Project $9,160, two months. Status: Completed.

21. *Co-Investigator*. "Expanding Ecosystem Service Provisioning from Coastal Restoration to Minimize Environmental and Energy Constraints" (2015). With John Day and Chris D'Elia. Gulf Research Program. Total Project: $147,937. Status: Completed.

22. *Principal Investigator*. "Coastal Marine Institute Administrative Grant" (2104). U.S. Department of the Interior. Total Project $45,000. Status: Completed.

23. *Principal Investigator*. "Analysis of the Potential for Combined Heat and Power (CHP) in Louisiana." (2013). Louisiana Department of Natural Resources. Total Project: $90,000. Status: Completed.

24. *Co-Investigator*. "CNH: A Tale of Two Louisianas: Coupled Natural-Human Dynamics in a Vulnerable Coastal System" (2013) With Nina Lam, Margaret Reams, Kam-Biu Liu, Victor Rivera, Yi-Jun Xu and Kelley Pace. National Science Foundation. Total Project: $1.5 million. Status: Completed (Sept 2012-Feb 2017).

25. *Principal Investigator*. "Examination of Unconventional Natural Gas and Industrial Economic Development" (2012). America's Natural Gas Alliance. Total Project: $48,210. Status: Completed.

26. *Principal Investigator*. "Investigation of the Potential Economic Impacts Associated with Shell's Proposed Gas-To-Liquids Project" (2012). Shell Oil Company, North America. Total Project: $76,708. Status: Completed.

27. *Principal Investigator*. "Analysis of the Federal Wind Energy Production Tax Credit." American Energy Alliance. Total Project: $20,000. Status: Completed.

28. *Principal Investigator*. "Energy Sector Impacts Associated with the Deepwater Horizon Oil Spill." Louisiana Department of Economic Development. Total Project: approximately $50,000. Status: Completed.

29. *Principal Investigator*. "Economic Contributions and Benefits Support by the Port of Venice." Port of Venice Coalition. Total Project: $20,000. Status: Completed.

30. *Principal Investigator.* "Energy Policy Development in Louisiana." Louisiana Department of Natural Resources. Total Project: $150,000. Status: Completed.

31. *Principal Investigator.* "Preparing Louisiana for the Possible Federal Regulation of

Greenhouse Gas Regulation." With Michael D. McDaniel. Louisiana Department of Economic Development. Total Project: $98,543. Status: Completed.

32. *Principal Investigator*. "OCS Studies Review: Louisiana and Texas Oil and Gas Activity and Production Forecast; Pipeline Position Paper; and Geographical Units for Observing and Modeling Socioeconomic Impact of Offshore Activity." (2008). With Mark J. Kaiser and Allan G. Pulsipher. U.S. Department of the Interior, Minerals Management Service. Total Project: $377,917 (3 years). Status: Completed.

33. *Principal Investigator*. "State and Local Level Fiscal Effects of the Offshore Petroleum Industry." (2007). With Loren C. Scott. U.S. Department of the Interior, Minerals Management Service. Total Project: $241,216 (2.5 years). Status: Completed.

34. *Principal Investigator*. "Understanding Current and Projected Gulf OCS Labor and Ports Needs." (2007). With Allan. G. Pulsipher, Kristi A. R. Darby. U.S. Department of the Interior, Minerals Management Service. Total Project: $169,906. (one year). Status: Completed.

35. *Principal Investigator*. "Structural Shifts and Concentration of Regional Economic Activity Supporting GOM Offshore Oil and Gas Activities." (2007). With Allan. G. Pulsipher, Michelle Barnett. U.S. Department of the Interior, Minerals Management Service. Total Project: $78,374 (one year). Status: Awarded, Completed.

36. *Principal Investigator*. "Plaquemine Parish's Role in Supporting Critical Energy Infrastructure and Production." (2006). With Seth Cureington. Plaquemines Parish Government, Office of the Parish President and Plaquemines Association of Business and Industry. Total Project: $18,267. Status: Completed.

37. *Principal Investigator*. "Diversifying Energy Industry Risk in the Gulf of Mexico." (2006). With Kristi A. R. Darby. U.S. Department of the Interior, Minerals Management Service. Total Project: $65,302 (two years). Status: Awarded, Completed.

38. *Principal Investigator*. "Post-Hurricane Assessment of OCS-Related Infrastructure and Communities in the Gulf of Mexico Region." (2006). U.S. Department of the Interior, Minerals Management Service. Total Project Funding: $244,837. Status: Completed.

39. *Principal Investigator*. "Ultra-Deepwater Road Mapping Process." (2005). With Kristi A. R. Darby, Subcontract with the Texas A&M University, Department of Petroleum Engineering. Funded by the Gas Technology Institute. Total Project Funding: $15,000. Status: Completed.

40. *Principal Investigator*. "An Examination of the Opportunities for Drilling Incentives on State Leases." (2004). With Robert H. Baumann and Kristi A. R. Darby. Louisiana Office of Mineral Resources. Total Project Funding: $75,000. Status: Completed.

41. *Principal Investigator*. " An Examination on the Development of Liquefied Natural Gas Facilities on the Gulf of Mexico." (2004). With Dmitry V. Mesyanzhinov and Mark J. Kaiser. U.S. Department of the Interior, Minerals Management Service. Total Project Funding $101,054. Status: Completed.

42. *Principal Investigator*. "Examination of the Economic Impacts Associated with Large Customer, Industrial Retail Choice." (2004). With Dmitry V. Mesyanzhinov. Louisiana Mid-Continent Oil and Gas Association. Total Project Funding: $37,000. Status: Completed.

43. *Principal Investigator*. "Economic Opportunities from LNG Development in Louisiana." (2003). With Dmitry V. Mesyanzhinov. Metrovision/New Orleans Chamber of Commerce and the Louisiana Department of Economic Development. Total Project Funding: $25,000. Status: Completed.

44. *Principal Investigator*. "Marginal Oil and Gas Properties on State Leases in Louisiana: An Empirical Examination and Policy Mechanisms for Stimulating Additional Production." (2002). With Robert H. Baumann and Dmitry V. Mesyanzhinov. Louisiana Office of Mineral Resources. Total Project Funding: $72,000. Status: Completed.

45. *Principal Investigator*. "A Collaborative Investigation of Baseline and Scenario Information for Environmental Impact Statements." (2002). With Dmitry V. Mesyanzhinov and Williams O. Olatubi. U.S. Department of Interior, Minerals Management Service. Total Project Funding: $557,744. Status: Awarded, In Progress.

46. *Co-Principal Investigator*. "An Analysis of the Economic Impacts of Drilling and Production Activities on State Leases." (2002). With Robert H. Baumann, Allan G. Pulsipher, and Dmitry V. Mesyanzhinov. Louisiana Office of Mineral Resources. Total Project Funding: $8,000. Status: Completed.

47. *Principal Investigator*. "Cost Profiles and Cost Functions for Gulf of Mexico Oil and Gas Development Phases for Input Output Modeling." (1998). With Dmitry Mesyanzhinov and Allan G. Pulsipher. U.S. Department of Interior, Minerals Management Service. Total Project Funding: $244,956. Status: Completed.

48. *Principal Investigator*. "An Economic Impact Analysis of OCS Activities on Coastal Louisiana." (1998). With Dmitry Mesyanzhinov and David Hughes. U.S. Department of Interior, Minerals Management Service. Total Project Funding: $190,166. Status: Completed.

49. *Principal Investigator*. "Energy Conservation and Electric Restructuring in Louisiana." (1997). Louisiana Department of Natural Resources." Petroleum Violation Escrow Program Funds. Total Project Funding: $43,169. Status: Completed.

50. *Principal Investigator*. "The Industrial Supply of Electricity: Commercial Generation, Self-Generation, and Industry Restructuring." (1996). With Andrew Kleit. Louisiana Energy Enhancement Program, LSU Office of Research and Development. Total Project Funding: $19,948. Status: Completed.

51. *Co-Principal Investigator*. "Assessing the Environmental and Safety Risks of the Expanded Role of Independents in Oil and Gas E&P Operations on the U.S. Gulf of Mexico OCS." (1996). With Allan Pulsipher, Omowumi Iledare, Dmitry Mesyanzhinov, William Daniel, and Bob Baumann. U.S. Department of Interior, Minerals Management Service, Grant Number 95-0056. Total Project Funding: $109,361. Status: Completed.

ACADEMIC CONFERENCE PAPERS/PRESENTATIONS

1. "The changing nature of Gulf of Mexico energy infrastructure." (2017). Session 3B: New Directions in Social Science Research. 27th Gulf of Mexico Region Information Technology Meetings. U.S. Department of the Interior, Bureau of Ocean Energy Management, Environmental Studies Program. New Orleans, LA. August 24.

2. "Capacity utilization, efficiency trends, and economic risks for modern CHP installations."

(2017). U.S. Department of Energy, 2017 Industrial Energy Technology Conference, New Orleans, LA June 21.

3. "Vulnerability assessment of the central Gulf of Mexico coast using a multi-dimensional approach." (2016). With Siddhartha Narra. Eighth International Conference on Environmental Science and Technology. June 6-10, Houston, TX.

4. "The Impact of Infrastructure Cost Recovery Mechanisms on Pipeline Replacements and Leaks." (2015). With Gregory Upton. Southern Economic Association Meeting 2015. New Orleans, Louisiana. November 23.

5. "The Impact of Infrastructure Cost Recovery Mechanisms on Pipeline Replacements and Leaks" (2015). With Gregory Upton. 38th IAEE International Conference, Antalya, Turkey. May 26.

6. "Modifying Renewables Policies to Sustain Positive Economic and Environmental Change" (2015). IEEE Annual Green Technologies ("Greentech") Conference. April 17.

7. "The Gulf Coast Industrial Investment Renaissance and New CHP Development Opportunities." (2014). Industrial Energy and Technology Conference, New Orleans, Louisiana. May 20.

8. "Estimating Critical Energy Infrastructure Value at Risk from Coastal Erosion" (2014). With Siddhartha Narra. American's Estuaries: 7th Annual Summit on Coastal and Estuarine Habitat Restoration. Washington, D.C., November 3-6.

9. "Economies of Scale, Learning Curves, and Offshore Wind Development Costs" (2012). With Gregory Upton. Southern Economic Association Annual Conference, New Orleans, LA November 17.

10. "Analysis of Risk and Post-Hurricane Reaction." (2009). 25th Annual Information Transfer Meeting. U.S. Department of the Interior, Minerals Management Service. January 7.

11. "Legacy Litigation, Regulation, and Other Determinants of Interstate Drilling Activity Differentials." (2008). With Christopher Peters and Mark Kaiser. 28th Annual USAEE/IAEE North American Conference: Unveiling the Future of Future of Energy Frontiers. New Orleans, LA, December 3.

12. "Gulf Coast Energy Infrastructure Renaissance: Overview." (2008). 28th Annual USAEE/IAEE North American Conference: Unveiling the Future of Future of Energy Frontiers. New Orleans, LA, December 3.

13. "Understanding the Impacts of Katrina and Rita on Energy Industry Infrastructure." (2008). American Chemical Society National Meetings, New Orleans, Louisiana. April 7.

14. "Determining the Economic Value of Coastal Preservation and Restoration on Critical Energy Infrastructure." (2007). With Kristi A. R. Darby and Michelle Barnett. International Association for Energy Economics, Wellington, New Zealand, February 19.

15. "Regulatory Issues in Rate Design, Incentives, and Energy Efficiency." (2007). 34th Annual Public Utilities Research Center Conference, University of Florida. Gainesville, FL. February 16.

16. "An Examination of LNG Development on the Gulf of Mexico." (2007). With Kristi A.R. Darby. US Department of the Interior, Minerals Management Service. 24th Annual Information Technology Meeting. New Orleans, LA. January 9.

17. "OCS-Related Infrastructure on the GOM: Update and Summary of Impacts." (2007). U.S. Department of the Interior, Minerals Management Service. 24th Annual Information Technology Meeting. New Orleans, LA. January 10.

18. "The Economic Value of Coastal Preservation and Restoration on Critical Energy Infrastructure." (2006). With Michelle Barnett. Third National Conference on Coastal and Estuarine Habitat Restoration. Restore America's Estuaries. New Orleans, Louisiana, December 11.

19. "The Impact of Implementing a 20 Percent Renewable Portfolio Standard in New Jersey." (2006). With Seth E. Cureington. Mid-Continent Regional Science Association 37th Annual Conference, Purdue University, Lafayette, Indiana, June 9.

20. "The Impacts of Hurricane Katrina and Rita on Energy infrastructure Along the Gulf Coast." (2006). Environment Canada: 2006 Artic and Marine Oilspill Program. Vancouver, British Columbia, Canada.

21. "Hurricanes, Energy Markets, and Energy Infrastructure in the Gulf of Mexico: Experiences and Lessons Learned." (2006). With Kristi A.R. Darby and Seth E. Cureington. 29th Annual IAEE International Conference, Potsdam, Germany, June 9.

22. "An Examination of the Opportunities for Drilling Incentives on State Leases in Louisiana." (2005). With Kristi A.R. Darby. 28th Annual IAEE International Conference, Taipei, Taiwan (June).

23. "Fiscal Mechanisms for Stimulating Oil and Gas Production on Marginal Leases." (2004). With Jeffrey M. Burke. International Association of Energy Economics Annual Conference, Washington, D.C. (July).

24. "GIS and Applied Economic Analysis: The Case of Alaska Residential Natural Gas Demand." (2003). With Dmitry V. Mesyanzhinov. Presented at the Joint Meeting of the East Lakes and West Lakes Divisions of the Association of American Geographers in Kalamazoo, MI, October 16-18.

25. "Are There Any In-State Uses for Alaska Natural Gas?" (2002). With Dmitry V. Mesyanzhinov and William E. Nebesky. IAEE/USAEE 22nd Annual North American Conference: "Energy Markets in Turmoil: Making Sense of It All." Vancouver, British Columbia, Canada. October 7.

26. "The Economic Impact of State Oil and Gas Leases on Louisiana." (2002). With Dmitry V. Mesyanzhinov. 2002 National IMPLAN Users' Conference. New Orleans, Louisiana, September 4-6.

27. "Moving to the Front of the Lines: The Economic Impact of Independent Power Plant Development in Louisiana." (2002). With Dmitry V. Mesyanzhinov and Williams O. Olatubi. 2002 National IMPLAN Users' Conference. New Orleans, Louisiana, September 4-6.

28. "New Consistent Approach to Modeling Regional Economic Impacts of Offshore Oil and Gas Activities in the Gulf of Mexico." (2002). With Vicki Zatarain. 2002 National IMPLAN Users' Conference. New Orleans, Louisiana, September 4-6.

29. "Distributed Energy Resources, Energy Efficiency, and Electric Power Industry Restructuring." (1999). American Society of Environmental Science Fourth Annual Conference. Baton Rouge, Louisiana. December.

30. "Estimating Efficiency Opportunities for Coal Fired Electric Power Generation: A DEA Approach." (1999). With Williams O. Olatubi. Southern Economic Association Sixty-ninth Annual Conference. New Orleans, November.

31. "Applied Approaches to Modeling Regional Power Markets." (1999.) With Robert F. Cope. Southern Economic Association Sixty-ninth Annual Conference. New Orleans, November 1999.

32. "Parametric and Non-Parametric Approaches to Measuring Efficiency Potentials in Electric Power Generation." (1999). With Williams O. Olatubi. International Atlantic Economic Society Annual Conference, Montreal, October.

33. "Asymmetric Choice and Customer Benefits: Lessons from the Natural Gas Industry." (1999). With Rachelle F. Cope and Dmitry Mesyanzhinov. International Association of Energy Economics Annual Conference. Orlando, Florida. August.

34. "Modeling Regional Power Markets and Market Power." (1999). With Robert F. Cope. Western Economic Association Annual Conference. San Diego, California. July.

35. "Economic Impact of Offshore Oil and Gas Activities on Coastal Louisiana" (1999). With Dmitry Mesyanzhinov. Annual Meeting of the Association of American Geographers. Honolulu, Hawaii. March.

36. "Empirical Issues in Electric Power Transmission and Distribution Cost Modeling." (1998). With Robert F. Cope and Dmitry Mesyanzhinov. Southern Economic Association. Sixty-Eighth Annual Conference. Baltimore, Maryland. November.

37. "Modeling Electric Power Markets in a Restructured Environment." (1998). With Robert F. Cope and Dan Rinks. International Association for Energy Economics Annual Conference. Albuquerque, New Mexico. October.

38. "Benchmarking Electric Utility Distribution Performance." (1998) With Robert F. Cope and Dmitry Mesyanzhinov. Western Economic Association, Seventy-sixth Annual Conference. Lake Tahoe, Nevada. June.

39. "Power System Operations, Control, and Environmental Protection in a Restructured Electric Power Industry." (1998). With Fred I. Denny. IEEE Large Engineering Systems Conference on Power Engineering. Nova Scotia, Canada. June.

40. "Benchmarking Electric Utility Transmission Performance." (1997). With Robert F. Cope and Dmitry Mesyanzhinov. Southern Economic Association, Sixty-seventh Annual Conference. Atlanta, Georgia. November 21-24.

41. "A Non-Linear Programming Model to Estimate Stranded Generation Investments in a Deregulated Electric Utility Industry." (1997). With Robert F. Cope and Dan Rinks. Institute for Operations Research and Management Science Annual Conference. Dallas Texas. October 26-29.

42. "New Paradigms for Power Engineering Education." (1997). With Fred I. Denny. International Association of Science and Technology for Development, High Technology in the Power Industry Conference. Orlando, Florida. October 27-30

43. "Cogeneration and Electric Power Industry Restructuring." (1997). With Andrew N. Kleit. Western Economic Association, Seventy-fifth Annual Conference. Seattle, Washington. July 9-13.

44. "The Unintended Consequences of the Public Utilities Regulatory Policies Act of 1978." (1997). National Policy History Conference on the Unintended Consequences of Policy Decisions. Bowling Green State University. Bowling Green, Ohio. June 5-7.

45. "Assessing Environmental and Safety Risks of the Expanding Role of Independents in E&P Operations on the Gulf of Mexico OCS." (1996). With Allan Pulsipher, Omowumi Iledare, Dmitry Mesyanzhinov, and Bob Baumann. U.S. Department of Interior, Minerals Management Service, 16th Annual Information Transfer Meeting. New Orleans, Louisiana.

46. "Empirical Modeling of the Risk of a Petroleum Spill During E&P Operations: A Case Study of the Gulf of Mexico OCS." (1996). With Omowumi Iledare, Allan Pulsipher, and Dmitry Mesyanzhinov. Southern Economic Association, Sixty-Sixth Annual Conference. Washington, D.C.

47. "Input Price Fluctuations, Total Factor Productivity, and Price Cap Regulation in the Telecommunications Industry" (1996). With Farhad Niami. Southern Economic Association, Sixty-Sixth Annual Conference. Washington, D.C.

48. "Recovery of Stranded Investments: Comparing the Electric Utility Industry to Other Recently Deregulated Industries" (1996). With Farhad Niami and Dmitry Mesyanzhinov. Southern Economic Association, Sixty-Sixth Annual Conference. Washington, D.C.

49. "Spatial Perspectives on the Forthcoming Deregulation of the U.S. Electric Utility Industry." (1996) With Dmitry Mesyanzhinov. Southwest Association of American Geographers Annual Meeting. Norman, Oklahoma.

50. "Comparing the Safety and Environmental Performance of Offshore Oil and Gas Operators." (1995). With Allan Pulsipher, Omowumi Iledare, Dmitry Mesyanzhinov, William Daniel, and Bob Baumann. U.S. Department of Interior, Minerals Management Service, 15th Annual Information Transfer Meeting. New Orleans, Louisiana.

51. "Empirical Determinants of Nuclear Power Plant Disallowances." (1995). Southern Economic Association, Sixty-Fifth Annual Conference. New Orleans, Louisiana.

52. "A Cross-Sectional Model of IntraLATA MTS Demand." (1995). Southern Economic Association, Sixty-Fifth Annual Conference. New Orleans, Louisiana.

ACADEMIC SEMINARS AND PRESENTATIONS

1. Panelist. "Fuel Security, Resource Adequacy & Value of Transmission." (2019). 6th Annual Electricity Dialogue at Northwestern University: Energy and Capacity: Transitions? Northwestern University Center of Law, Regulation, and Economic Growth.

2. "Air Emissions Regulation and Policy: The Recently Proposed Cross State Air Pollution Rule and the Implications for Louisiana Power Generation." Lecture before School of the

Coast & Environment. November 5, 2011.

3. "Energy Regulation: Overview of Power and Gas Regulation." Lecture before School of the Coast & Environment, Course in Energy Policy and Law. October 5, 2009.
4. "Trends and Issues in Renewable Energy." Presentation before the School of the Coast & Environment, Louisiana State University. Spring Guest Lecture Series. May 4, 2007.
5. "CES Research Projects and Status." Presentation before the U.S. Department of the Interior, Minerals Management Service, Outer Continental Shelf Scientific Committee Meeting, New Orleans, LA May 22, 2007.
6. "Hurricane Impacts on Energy Production and Infrastructure." Presentation Before the 53rd Mineral Law Institute, Louisiana State University. April 7, 2006.
7. "Trends and Issues in the Natural Gas Industry and the Development of LNG: Implications for Louisiana. (2004) 51st Mineral Law Institute, Louisiana State University, Baton Rouge, LA. April 2, 2004.
8. "Electric Restructuring and Conservation." (2001). Presentation before the Department of Electrical Engineering, McNesse State University. Lake Charles, Louisiana. May 2, 2001.
9. "Electric Restructuring and the Environment." (1998). Environment 98: Science, Law, and Public Policy. Tulane University. Tulane Environmental Law Clinic. March 7, New Orleans, Louisiana.
10. "Electric Restructuring and Nuclear Power." (1997). Louisiana State University. Department of Nuclear Science. November 7, Baton Rouge, Louisiana.
11. "The Empirical Determinants of Co-generated Electricity: Implications for Electric Power Industry Restructuring." (1997). With Andrew N. Kleit. Florida State University. Department of Economics: Applied Microeconomics Workshop Series. October 17, Tallahassee, Florida.

PROFESSIONAL AND CIVIC PRESENTATIONS

1. "Gulf cost energy outlook: traditional resources and the energy transition." (2023). AAPL/Gulf Coast Land Institute Meetings. April 26, 2023.
2. "Ratepayer considerations in the promotion of clean energy." (2023). Public Utility Law Section Roundtable Discussion. April 21, 2023.
3. "Gulf coast energy outlook: traditional resources and the energy transition." (2023). Louisiana Engineering Society. April 19, 2023.
4. "Carbon capture & storage: three thoughts and considerations." (2023). Gulf Coast Power Association. 9th Annual MISO/SPP Conference. March 9, 2023.
5. "Natural gas markets: prices; trends; and ratepayer impacts." (2023). Maryland Energy Advocates Virtual Monthly Meeting. February 17, 2023.
6. "Hydrogen overview and its role in Louisiana decarbonization." (2022). Louisiana Public Service Commission Monthly Business & Executive Meeting. November 17, 2022.

7. “High winter natural gas prices and ratepayer impacts.” (2022). National Association of State Utility Consumer Advocates (“NASUCA”) Annual Conference. November 14, 2022.
8. “Facing the future together: the Louisiana energy transition, industrial decarbonization, and capital formation trends.” (2022). Louisiana Chemical Association: Annual Meeting 2022. October 27, 2022.
9. “Louisiana and the energy transition: reconciling industrial decarbonization, capital formation, and growth.” (2022). Louisiana Air and Waste Management 2022 Annual Meeting. October 26, 2022.
10. “The Louisiana energy transition, industrial decarbonization, and industrial capital formation trends.” (2022). Postlethwaite & Netterville: 2022 Governmental Update. August 4, 2022.
11. “Identifying and mapping regulatory requirements for CCUS projects.” (2022). SECARB Offshore GOM Gulf Regulator Workshop. New Orleans LA. May 16, 2022.
12. “Louisiana industrial decarbonization opportunities.” (2022). Louisiana Chemical Association/Louisiana Chemical Industry Alliance Legislative Meeting. May 11, 2022. Baton Rouge, LA.
13. “Natural Gas outlook, 2022: supply, demand, and geopolitical considerations.” (2022). National Association of State Utility Consumer Advocates (“NASUCA”) Monthly Natural Gas Committee Webinar. March 30, 2022.
14. “Louisiana industrial decarbonization opportunities.” (2022). LSU Law School, Journal of Energy Law and Resources Symposium on Energy Transitions. February 4, 2022. Baton Rouge, LA.
15. Panelist. Grid Resiliency in the Era of Extreme Weather. Gulf Coast Power Association 8th Annual MISO/SPP Regional Meeting. February 9, 2022. New Orleans, LA.
16. Panelist. Natural Gas Industry Update. (2022). National Association of State Utility Consumer Advocates Annual Meeting. (virtual). November 8, 2021.
17. “Overview of Louisiana’s greenhouse gas emissions and trends.” (2021). Louisiana Energy Users Group (“LEUG”) Meeting. November 11, 2021.
18. “State of energy in Louisiana: a preview of the 2021 Gulf Coast Energy Outlook.” (2021). Financial Planning Association of Baton Rouge. November 10, 2021.
19. “Replacing natural gas and industrial decarbonization: utility and ratemaking issues.” (2021). Virtual Joint Annual Meeting: Virginia Committee for Fair Utility Rates, Old Dominion Committee for Fair Utility Rates, and Virginia Industrial Gas Users Group Workshop. September 8, 2021.
20. “Louisiana 2021 GHG Inventory: Update and summary of preliminary findings.” (2021). Presentation before the Climate Initiative Task Force. July 29, 2021.
21. “Opportunities for the development of a hydrogen economy in Louisiana.” (2021). Louisiana Energy Climate Solutions Workshop. June 15, 2021.
22. “Natural gas: Building gas system resilience. Overview of the 2021 polar vortex and its implications for gas resiliency.” (2021). National Association of State Utility Consumer Advocates (“NASUCA”). Virtual mid-year meeting. June 14, 2021.

23. “Status and briefing on the Louisiana greenhouse gas inventory and emissions analysis.” (2021). Scientific Advisory Group (“SAG”) Meeting, Governor’s Climate Initiative Task Force. March 29, 2021.

24. “Louisiana carbon capture: sinks; sources; and the role of transportation in industrial applications.” (2021). LSU Journal of Energy Law & Resources Symposium on Carbon Capture and Solutions. February 5, 2021.

25. “Natural gas outlook, 2021: production, demand, pandemic and policy.” (2021). National Association of State Utility Consumer Advocates (“NASUCA”) Monthly Natural Gas Committee Webinar. January 20, 2021.

26. “Consumer Perspectives on the Rate Design of the Future.” (2020). National Association of State Utility Consumer Advocates (“NASUCA”). Annual Conference, November 10.

27. “Evaluation of Louisiana’s Depleted Gas Reservoirs for Geological Carbon Sequestration.” (2020). Louisiana Mid-Continent Oil and Gas Association (“LMOGA”) Carbon Capture and Underground Storage (“CCUS”) Committee Meeting. August 25.

28. “The 2020 Gulf Coast Energy Outlook: COVID-19 update.” (2020). Baton Rouge Area Chamber of Commerce Business Webinar. COVID-19 and Global Supply Impacts on the Capital Region and Louisiana Economies. Baton Rouge, LA. June 3.

29. “Ratepayer benefits of reforming PURPA”. (2020). Harvard Electricity Policy Group Webinar. PURPA: A time to reform or reduce its role? March 26.

30. “Pipeline industry: economic trends and outlook”. (2020). Joint Industry Association Annual Meeting. Louisiana Mid-Continent Oil and Gas Association (“LMOGA”) and the Louisiana Oil and Gas Association (“LOGA”). Lake Charles, LA March 5.

31. “The outlook for natural gas: storm clouds ahead?” (2020). National Association of State Utility Consumer Advocates (“NASUCA”). Natural Gas Committee Webinar, February 26.

32. “The 2020 Gulf Coast Energy Outlook”. (2020). University of Louisiana Lafayette, Southern Unconventional Resources Center for Excellence. Lafayette, LA February 16.

33. “Opportunities for carbon capture, utilization, and storage in the Louisiana chemical corridor”. (2020). Air and Waste Management Association, Louisiana Section Luncheon. Gonzales, LA January 16.

34. Panelist. (2020). Baton Route Advocate, 2020 Economic Outlook Summit. Baton Rouge Advocate. January 8.

35. “2020 Louisiana business climate outlook: the view from the energy sector.” (2019). American Council of Engineering Companies Fall Conference. November 21, 2019. Baton Rouge, LA

36. “The urgency of PURPA reform in protecting ratepayers.” (2019). Americans for Tax Reform, Fall 2019 Coalition Leaders Summit, November 14, 2019. New Orleans, LA.

37. “Louisiana’s coast and the energy industry.” (2019). 2019 API Delta Chapter Joint Society Luncheon Meeting. November 12, 2019, New Orleans, LA.

38. “Reforming PURPA: implications for ratepayers.” (2019). Thomas Jefferson Institute for Public Policy, Annual Energy Summit, State Policy Network Annual Meeting. Colorado Springs, CO, October 28.

39. "Natural gas outlook: supply, demand and prices." (2019). National Association of State Utility Consumer Advocates, Natural Gas Committee Monthly Meeting. July 30, 2019.

40. "The economic impacts and outlook for LNG development on the Gulf Coast." (2019). 73rd Annual Meeting of the Southern Legislative Conference of the Council of State Governments. New Orleans, LA, July 14. (prepared presentation, hurricane cancellation)

41. "Natural gas outlook: supply, demand, and prices." (2019). NASUCA Mid-Year Meeting. Portland, OR, June 20.

42. "Overview of Louisiana LNG issues and trends." (2019). Berlin: LNG, Energy Security, and Diversity Reporting Tour, LSU Center for Energy Studies. Baton Rouge, LA, May 9.

43. "Overview of Louisiana energy issues and outlook." (2019). Australian Media Visit, Greater New Orleans, Inc./Baton Rouge Area Foundation. Baton Rouge, LA, April 29.

44. "Gulf Coast Energy Outlook 2019: Regional trends and outlook." (2019). Women's Energy Network. Baton Rouge, LA, April 23.

45. "MISO Grid Vision 2033." (2019). 2019 Spring Regulator and Policymaker Forum. New Orleans, LA, April 15-16.

46. "Ratepayer benefits of reforming PURPA." (2019). LSU Center for Energy Studies Industry Advisory Council Meeting. March 27.

47. "Incentives, risk, and the changing nature of regulation." (2019). NASUCA Water Committee monthly meeting/webinar. March 13.

48. "Gulf Coast Energy Outlook 2019: Production, trade and infrastructure trends." (2019). 66th Annual Mineral Board Institute Meetings. Baton Rouge, LA, March 14.

49. "A golden age: energy outlook 2019." (2019). Engineering News Record Webinar. February 13.

50. Panelist. (2019). Baton Route Advocate, 2019 Economic Outlook Summit. Baton Rouge Advocate. January 8.

51. "MISO Grid Vision 2033." (2018). 2018 Winter Regulatory and Policymaker Forum. New Orleans, LA, December 11.

52. "Gulf Coast Energy Outlook 2019." (2018). LSU Center for Energy Studies, Baton Rouge, LA, Fall 2018.

53. "How LNG is transforming Louisiana's energy economy." (2018). Louisiana State Bar Association, Public Utility Section. Baton Rouge, LA, November 30.

54. "Overview of Louisiana LNG issues and trends." (2018). Kean Miller Law Firm: Energy and Environmental Practice Group. Baton Rouge, LA, November 28.

55. "Infrastructure and capacity: challenges for development." (2018). Society of Utility and Regulatory Financial Analysts (SURFA) Annual Meeting, New Orleans, LA, April 20.

56. "Louisiana industrial cogeneration trends." (2018). Annual Louisiana Solid Waste Association Conference, Lafayette, LA, March 16.

57. "Gulf Coast industrial development: overview of trends and issues." (2018). Gulf Coast Power Association Meetings, New Orleans, LA, February 8.

58. "Energy outlook – reflection on market trends and Louisiana implications." (2017). IberiaBank Corporation Bank Board of Directors Meeting, New Orleans, LA. November 15.

59. "Integrated carbon capture and storage in the Louisiana chemical corridor." (2017). Industry Associates Advisory Council Meeting, Baton Rouge, LA. November 7.

60. "The outlook for natural gas and energy development on the Gulf Coast." (2017). Louisiana Chemical Association, Annual Meeting, New Orleans, LA. October 26.

61. "Critical energy infrastructure: the big picture on resiliency research." (2017). National Academies of Science, Engineering, and Medicine. New Orleans, LA. September 18.

62. "The changing nature of Gulf of Mexico energy infrastructure." (2017). 27th Gulf of Mexico Region Information Technology Meetings, New Orleans, LA, August 24.

63. "Capacity utilization, efficiency trends, and economic risks for modern CHP installations." (2017). Industrial Energy Technology Conference, New Orleans, LA. June 21.

64. "Crude oil and natural gas outlook: Where are we and where are we going?" (2017). CCREDC Economic Trends Panel. Corpus Christi, TX, June 15.

65. "Navigating through the energy landscape." (2017). Baton Rouge Rotary Luncheon. Baton Rouge, LA, May 24.

66. "The 2017-2018 Louisiana energy outlook." (2017). Junior Achievement of Greater New Orleans, JA BizTown Speaker Series. New Orleans, LA, May 12.

67. "The Gulf Coast energy economy: trends and outlook." (2017). Society for Municipal Analysts. New Orleans, LA, April 21.

68. "Gulf coast energy outlook." (2017). E.J. Ourso College of Business, Dean's Advisory Council, Energy Committee Meeting. Baton Rouge, LA, March 31.

69. "Recent trends in energy: overview and impact for the banking community." (2017). Oil and Gas Industry Update, Louisiana Bankers Association. Baton Rouge, LA, March 24.

70. "How supply, demand and prices have influenced unconventional development." (2016). Energy Annual Meeting, CLEER-University Advisory Board Lecture. New Orleans, LA, September 17.

71. "The Basics of Natural Gas Production, Transportation, and Markets." (2016). Center for Energy Studies. Baton Rouge, LA, August 1.

72. "Gulf Coast industrial development: trends and outlook." (2016). Investor Relations Group Meeting, Edison Electric Institute. New Orleans, LA, June 23.

73. "The future of policy and regulation: Unlocking the Treasures of Utility Regulation." (2016). Annual Meeting, National Conference of Regulatory Attorneys. Tampa, FL, June 20.

74. "Utility mergers: where's the beef?". (2016). National Association of State Utility Consumer Advocates Mid-Year Meetings. New Orleans, LA, June 6.

75. "Overview of the Clean Power Plan and its application to Louisiana." (2016). Shell Oil Company Internal Meeting. April 12.

76. "Energy and economic development on the Gulf Coast: trends and emerging challenges." (2016). Gas Processors Association Meeting. New Orleans, LA, April 11.

77. "Unconventional Oil and Gas Drilling Trends and Issues." (2016). French Delegation Visit, LSU Center for Energy Studies. March 16.

78. "Gulf Coast Industrial Growth: Passing clouds or storms on the horizon?" (2016). Gulf Coast Power Association Meetings. New Orleans, LA, February 18.

79. "The Transition to Crisis: What do the recent changes in energy markets mean for Louisiana?" (2016). Louisiana Independent Study Group. February 2.

80. "Regulatory and Ratepayer Issues in the Analysis of Utility Natural Gas Reserves Purchases" (2016). National Association of State Utility Consumer Advocates Gas Consumer Monthly Meeting. January 25.

81. "Emerging Issues in Fuel Procurement: Opportunities & Challenges in Natural Gas Reserves Investment." (2015). National Association of State Utility Consumer Advocates Annual Meeting. Austin, Texas. November 9.

82. "Trends and Issues in Net Metering and Solar Generation." (2015). Louisiana Rural Electric Cooperative Meeting. November 5.

83. "Electric Power: Industry Overview, Organization, and Federal/State Distinctions." (2015). EUCI. October 16.

84. "Natural Gas 101: The Basics of Natural Gas Production, Transportation, and Markets." (2015). Council of State Governments Special Meeting on Gas Markets. New Orleans, LA. October 14.

85. "Update and General Business Matters." (2015). CES Industry Associates Meeting. Baton Rouge, Louisiana. Fall 2015.

86. "The Impact of Infrastructure Cost Recovery Mechanisms on Pipeline Replacements and Leaks." (2015). 38th IAEE 2015 International Conference. Antalya, Turkey. May 26.

87. "Industry on the Move – What's Next?" (2015). Event Sponsored by Regional Bank and 1012 Industry Report. May 5.

88. "The State of the Energy Industry and Other Emerging Issues." (2015). Lex Mundi Energy & Natural Resources Practice Group Global Meeting. May 5.

89. "Energy, Louisiana, and LSU." (2015). LSU Science Café. Baton Rouge, Louisiana. April 28.

90. "Energy Market Changes and Impacts for Louisiana." (2015). Kinetica Partners Shippers Meeting, New Orleans, Louisiana. April 22.

91. "Incentives, Risk and the Changing Nature of Utility Regulation." (2015). NARUC Staff Subcommittee on Accounting and Finance Meetings, New Orleans, Louisiana. April 22.

92. "Modifying Renewables Policies to Sustain Positive and Economic Change." (2015). IEEE Annual Green Technologies ("Greentech Conference"). April 17.

93. "Louisiana's Changing Energy Environment." (2015). John P. Laborde Energy Law Center Advisory Board Spring Meeting, Baton Rouge, Louisiana. March 27.

94. "The Latest and the Long on Energy: Outlooks and Implications for Louisiana." (2015). Iberia Bank Advisory Board Meeting, Baton Rouge, Louisiana. February 23.

95. "A Survey of Recent Energy Market Changes and their Potential Implications for Louisiana." (2015). Vistage Group, New Orleans, Louisiana. February 4.

96. "Energy Prices and the Outlook for the Tuscaloosa Marine Shale." (2015). Baton Rouge Rotary Club, Baton Rouge, Louisiana. January 28.

97. "Trends in Energy & Energy-Related Economic Development." (2014). Miller and Thompson Presentation, Baton Rouge, Louisiana. December 30.

98. "Overview EPA's Proposed Rule Under Section 111(d) of the Clean Air Act: Impacts for Louisiana." (2014). Louisiana State Bar: Utility Section CLE Annual Meeting, Baton Rouge, Louisiana. November 7.

99. "Overview EPA's Proposed Clean Power Plan and Impacts for Louisiana." (2014). Clean Cities Coalition Meeting, Baton Rouge, Louisiana. November 5.

100. "Impacts on Louisiana from EPA's Proposed Clean Power Plan." (2014). Air & Waste Management Annual Environmental Conference (Louisiana Chapter), Baton Rouge, Louisiana. October 29, 2014.

101. "A Look at America's Growing Demand for Natural Gas." (2014). Louisiana Chemical Association Annual Meeting, New Orleans, Louisiana. October 23.

102. "Trends in Energy & Energy-Related Economic Development." (2014). 2014 Government Finance Officer Association Meetings, Baton Rouge, Louisiana. October 9.

103. "The Conventional Wisdom Associated with Unconventional Resource Development." (2014). National Association for Business Economics Annual Conference, Chicago, Illinois. September 28.

104. Unconventional Oil & Natural Gas: Overview of Resources, Economics & Policy Issues. (2014). Society of Environmental Journalists Annual Meeting. New Orleans, Louisiana. September 4.

105. "Natural Gas Leveraged Economic Development in the South." (2014). Southern Governors Association Meeting, Little Rock, Arkansas. August 16.

106. "The Past, Present and Future of CHP Development in Louisiana." (2014). Louisiana Public Service Commission CHP Workshop, Baton Rouge, Louisiana. June 25.

107. "Regional Natural Gas Demand Growth: Industrial and Power Generation Trends." (2014). Kinetica Partners Shippers Meeting, New Orleans, Louisiana. April 30.

108. "The Technical and Economic Potential for CHP in Louisiana and the Impact of the Industrial Investment Renaissance on New CHP Capacity Development." (2014). Electric Power 2014, New Orleans, Louisiana. April 1.

109. "Industry Investments and the Economic Development of Unconventional Development." (2014). Tuscaloosa Marine Shale Conference & Expo, Natchez, Mississippi. March 31.

110. Discussion Panelist. Energy Outlook 2035: The Global Energy Industry and Its Impact on Louisiana, (2014). Grow Louisiana Coalition, Baton Rouge, Louisiana. March 18.

111. "Natural Gas and the Polar Vortex: Has Recent Weather Led to a Structural Change in

Natural Gas Markets?" (2014). National Association of State Utility Consumer Advocates Monthly Gas Committee Meeting. February 19.

112. "Some Unconventional Thoughts on Regional Unconventional Gas and Power Generation Requirements." (2014). Gulf Coast Power Association Special Briefing, New Orleans, Louisiana. February 6.

113. "Leveraging Energy for Industrial Development." (2013). 2013 Governor's Energy Summit, Jackson, Mississippi. December 5.

114. "Natural Gas Line Extension Policies: Ratepayer Issues and Considerations." (2013). National Association of State Utility Consumer Advocates Annual Meeting, Orlando, Florida. November 19.

115. "Replacement, Reliability & Resiliency: Infrastructure & Ratemaking Issues in the Power & Natural Gas Distribution Industries." (2013). Louisiana State Bar, Public Utility Section Meetings. November 15.

116. "Natural Gas Markets: Leveraging the Production Revolution into an Industrial Renaissance." (2013). International Technical Conference, Houston, TX. October 11.

117. "Natural Gas, Coal & Power Generation Issues and Trends." (2013). Southeast Labor and Management Public Affairs Committee Conference, Chattanooga, Tennessee. September 27.

118. "Recent Trends in Pipeline Replacement Trackers." (2013). National Association of State Utility Consumer Advocates Monthly Gas Committee Meeting. September 19.

119. Discussion Panelist (2013). Think About Energy Summit, America's Natural Gas Alliance, Columbus Ohio. September 16-17.

120. "Future Test Years: Issues to Consider." (2013). National Regulatory Research Institute, Teleseminar on Future Test Years. August 28.

121. "Industrial Development Outlook for Louisiana." (2013). Louisiana Water Synergy Project Meetings, Jones Walker Law Firm, Baton Rouge, Louisiana. July 30.

122. "Natural Gas & Electric Power Coordination Issues and Challenges." (2013). Utilities State Government Organization Conference, Pointe Clear, Alabama. July 9.

123. "Natural Gas Market Issues & Trends." (2013). Western Conference of Public Service Commissioners, Santa Fe, New Mexico. June 3.

124. "Louisiana Unconventional Natural Gas and Industrial Redevelopment." (2013). Louisiana Chemical Association/Louisiana Chemical Industry Alliance Annual Legislative Conference, Baton Rouge, Louisiana. May 8.

125. "Infrastructure Cost Recovery Mechanism: Overview of Issues." (2013). Energy Bar Association Annual Meeting, Washington, D.C. May 1.

126. "GOM Offshore Oil and Gas." (2013). Energy Executive Roundtable, New Orleans, Louisiana. March 27.

127. "Louisiana Unconventional Natural Gas and Industrial Redevelopment." (2013). Risk Management Association Luncheon, March 21.

128. "Natural Gas Market Update and Emerging Issues." (2013). NASUCA Gas Committee

Conference Call/Webinar, March 12.

129. "Unconventional Resources and Louisiana's Manufacturing Development Renaissance." (2013). Baton Rouge Press Club, De La Ronde Hall, Baton Rouge, LA, January 28.

130. "New Industrial Operations Leveraged by Unconventional Natural Gas." (2013) American Petroleum Institute-Louisiana Chapter. Lafayette, LA, Petroleum Club, January 14.

131. "What's Going on with Energy? How Unconventional Oil and Gas Development is Impacting Renewables, Efficiency, Power Markets, and All that Other Stuff." (2012). Atlanta Economics Club Monthly Meeting. Atlanta, GA. December 11.

132. "Trends, Issues, and Market Changes for Crude Oil and Natural Gas." (2012). East Iberville Community Advisory Panel Meeting. St. Gabriel, LA. September 26.

133. "Game Changers in Crude and Natural Gas Markets." (2012). Chevron Community Advisory Panel Meeting. Belle Chase, LA, September 17.

134. "The Outlook for Renewables in a Changing Power and Natural Gas Market." (2012). Louisiana Biofuels and Bioprocessing Summit. Baton Rouge, LA. September 11.

135. "The Changing Dynamics of Crude and Natural Gas Markets." (2012). Chalmette Refining Community Advisory Panel Meeting. Chalmette, LA, September 11.

136. "The Really Big Game Changer: Crude Oil Production from Shale Resources and the Tuscaloosa Marine Shale." (2012). Baton Rouge Chamber of Commerce Board Meeting. Baton Rouge, LA, June 27.

137. "The Impact of Changing Natural Gas Prices on Renewables and Energy Efficiency." (2012). NASUCA Gas Committee Conference Call/Webinar. 12 June 2012.

138. "Issues in Gas-Renewables Coordination: How Changes in Natural Gas Markets Potentially Impact Renewable Development" (2012). Energy Bar Association, Louisiana Chapter, Annual Meeting, New Orleans, LA. April 12, 2012.

139. "Issues in Natural Gas End-Uses: Are We Really Focusing on the Real Opportunities?" (2012). Energy Bar Association, Louisiana Chapter, Annual Meeting, New Orleans, LA. April 12, 2012.

140. "The Impact of Legacy Lawsuits on Conventional Oil and Gas Drilling in Louisiana." (2012). Louisiana Oil and Gas Association Annual Meeting, Lake Charles, LA. February 27, 2012.

141. "The Impact of Legacy Lawsuits on Conventional Oil and Gas Drilling in Louisiana." (2012) Louisiana Oil and Gas Association Annual Meeting. Lake Charles, Louisiana. February 27, 2012.

142. "Louisiana's Unconventional Plays: Economic Opportunities, Policy Challenges. Louisiana Mid-Continent Oil and Gas Association 2012 Annual Meeting. (2012) New Orleans, Louisiana. January 26, 2012.

143. "EPA's Recently Proposed Cross State Air Pollution Rule ("CSAPR") and Its Impacts on Louisiana." (2011). Bossier Chamber of Commerce. November 18, 2011.

144. "Facilitating the Growth of America's Natural Gas Advantage." (2011). BASF U.S. Shale Gas Workshop Management Meeting. Florham Park, New Jersey. November 1, 2011.

145. "CSAPR and EPA Regulations Impacting Louisiana Power Generation." (2011). Air and Waste Management Association (Louisiana Section) Fall Conference. Environmental Focus 2011: a Multi-Media Forum. Baton Rouge, LA. October 25, 2011.

146. "Natural Gas Trends and Impact on Industrial Development." (2011). Central Gulf Coast Industrial Alliance Conference. Arthur R. Outlaw Convention Center. Mobile, AL. September 22, 2011.

147. "Energy Market Changes and Policy Challenges." (2011). Southeast Manpower Tripartite Alliance ("SEMTA") Summer Conference. Nashville, TN September 2, 2011.

148. "EPA Regulations, Rates & Costs: Implications for U.S. Ratepayers." (2011). Workshop: "A Smarter Approach to Improving Our Environment." 38th Annual American Legislative Exchange Council ("ALEC") Meetings. New Orleans, LA. August 5, 2011.

149. Panelist/Moderator. Workshop: "Why Wait? Start Energy Independence Today." 38th Annual American Legislative Exchange Council ("ALEC") Meetings. New Orleans, LA. August 4, 2011.

150. "Facilitating the Growth of America's Natural Gas Advantage." Texas Chemical Council, Board of Directors Summer Meeting. San Antonio, TX. July 28, 2011.

151. "Creating Ratepayer Benefits by Reconciling Recent Gas Supply Opportunities with Past Policy Initiatives." National Association of State Utility Consumer Advocates ("NASUCA"), Monthly Gas Committee Meeting. July 12, 2011.

152. "Energy Market Trends and Policies: Implications for Louisiana." (2011). Lakeshore Lion's Club Monthly Meeting. Baton Rouge, Louisiana. June 20, 2011.

153. "America's Natural Gas Advantage: Securing Benefits for Ratepayers Through Paradigm Shifts in Policy." Southeastern Association of Regulatory Commissioners ("SEARUC") Annual Meeting. Nashville, Tennessee. June 14, 2011.

154. "Learning Together: Building Utility and Clean Energy Industry Partnerships in the Southeast." (2011). American Solar Energy Society National Solar Conference. Raleigh Convention Center, Raleigh, North Carolina. May 20, 2011.

155. "Louisiana Energy Outlook and Trends." (2011). Executive Briefing. Counsul General of Canada. LSU Center for Energy Studies, Baton Rouge, Louisiana. May 24, 2011.

156. "Louisiana's Natural Gas Advantage: Can We Hold It? Grow It? Or Do We Need to be Worrying About Other Problems?" (2011). Louisiana Chemical Association Annual Legislative Conference, Baton Rouge, Louisiana, May 5, 2011.

157. "Energy Outlook and Trends: Implications for Louisiana. (2011). Executive Briefing, Legislative Staff, Congressman William Cassidy. LSU Center for Energy Studies, Baton Rouge, Louisiana. March 25, 2011.

158. "Regulatory Issues in Inflation Adjustment Mechanisms and Allowances." (2011). Gas Committee, National Association of State Utility Consumer Advocates ("NASUCA"). February 15, 2011.

159. "Regulatory Issues in Inflation Adjustment Mechanisms and Allowances." (2010). 2010 Annual Meeting, National Association of State Utility Consumer Advocates ("NASUCA"), Omni at CNN Center, Atlanta, Georgia, November 16, 2010.

160. "How Current and Proposed Energy Policy Impacts Consumers and Ratepayers." (2010). 122nd Annual Meeting, National Association of Regulatory Utility Commissioners ("NARUC"), Omni at CNN Center, Atlanta, Georgia, November 15, 2010.

161. "Energy Outlook: Trends and Policies." (2010). 2010 Tri-State Member Service Conference; Arkansas, Louisiana, and Mississippi Electric Cooperatives. L'Auberge du Lac Casino Resort, Lake Charles, Louisiana, October 14, 2010.

162. "Deepwater Moratorium and Louisiana Impacts." (2010). The Energy Council Annual Meeting. Gulf of Mexico Deepwater Horizon Accident, Response, and Policy. Beau Rivage Conference Center. Biloxi, Mississippi. September 25, 2010.

163. "Overview on Offshore Drilling and Production Activities in the Aftermath of Deepwater Horizon." (2010) Jones Walker Banking Symposium. The Oil Spill: What Will it Mean for Banks in the Region? New Orleans, Louisiana. August 31, 2010.

164. "Long-Term Energy Sector Impacts from the Oil Spill." (2010). Second Annual Louisiana Oil & Gas Symposium. The BP Gulf Oil Spill: Long-Term Impacts and Strategies. Baton Rouge Geological Society. August 16, 2010.

165. "Overview and Issues Associated with the Deepwater Horizon Accident." (2010). Global Interdependence Meeting on Energy Issues. Baton Rouge, LA. August 12, 2010.

166. "Overview and Issues Associated with the Deepwater Horizon Accident." (2010). Regional Roundtable Webinar. National Association for Business Economics. August 10, 2010.

167. "Deepwater Moratorium: Overview of Impacts for Louisiana." Louisiana Association of Business and Industry Meeting. Baton Rouge, LA. June 25, 2010.

168. Moderator. Senior Executive Roundtable on Industrial Energy Efficiency. U.S. Department of Energy Conference on Industrial Efficiency. Office of Renewable Energy and Energy Efficiency. Royal Sonesta Hotel, New Orleans, LA. May 21, 2010.

169. "The Energy Outlook: Trends and Policies Impacting Southeastern Natural Gas Supply and Demand Growth." Second Annual Local Economic Analysis and Research Network ("LEARN") Conference. Federal Reserve Bank of Atlanta. March 29, 2010.

170. "Natural Gas Supply Issues: Gulf Coast Supply Trends and Implications for Louisiana." Energy Bar Association, New Orleans Chapter Meeting. Jones Walker Law Firm. January 28, 2010, New Orleans, LA.

171. "Potential Impacts of Federal Greenhouse Gas Legislation on Louisiana Industry." LCA Government Affairs Committee Meeting. November 10, 2009. Baton Rouge, LA

172. "Regulatory and Ratemaking Issues Associated with Cost and Revenue Tracker Mechanisms." National Association of State Utility Consumer Advocates ("NASUCA") Annual Meeting. November 10, 2009.

173. "Louisiana's Stakes in the Greenhouse Gas Debate." Louisiana Chemical Association and Louisiana Chemical Industry Alliance Annual Meeting: The Billing Dollar Budget Crisis: Catastrophe or Change? New Orleans, LA.

174. "Gulf Coast Energy Outlook: Issues and Trends." Women's Energy Network, Louisiana Chapter. September 17, 2009. Baton Rouge, LA.

175. "Gulf Coast Energy Outlook: Issues and Trends." Natchez Area Association of Energy

Service Companies. September 15, 2009, Natchez, MS.

176. "The Small Picture: The Cost of Climate Change to Louisiana." Louisiana Association of Business and Industry, U.S. Chamber of Commerce, Louisiana Oil and Gas Association, and LSU Center for Energy Studies Conference: Can Louisiana Make a Buck After Climate Change Legislation? August 21, 2009. Baton Rouge, LA.

177. "Carbon Legislation and Clean Energy Markets: Policy and Impacts." National Association of Conservation Districts, South Central Region Meeting. August 14, 2009. Baton Rouge, LA.

178. "Evolving Carbon and Clean Energy Markets." The Carbon Emissions Continuum: From Production to Consumption." Jones Walker Law Firm and LSU Center for Energy Studies Workshop. June 23, 2009. Baton Rouge, LA

179. "Potential Impacts of Cap and Trade on Louisiana Ratepayers: Preliminary Results." (2009). Briefing before the Louisiana Public Service Commission. Business and Executive Meeting, May 12, 2009. Baton Rouge, LA.

180. "Natural Gas Outlook." (2009). Briefing before the Louisiana Public Service Commission. Business and Executive Meeting, May 12, 2009. Baton Rouge, LA.

181. "Gulf Coast Energy Outlook: Issues and Trends." (2009). ISA-Lafayette Technical Conference & Expo. Cajundome Conference Center. Lafayette, Louisiana. March 12, 2009.

182. "The Cost of Energy Independence, Climate Change, and Clean Energy Initiatives on Utility Ratepayers." (2009). National Association of Business Economics (NABE). 25th Annual Washington Economic Policy Conference: Restoring Financial and Economic Stability. Arlington, VA March 2, 2009.

183. Panelist, "Expanding Exploration of the U.S. OCS" (2009). Deep Offshore Technology International Conference and Exhibition. PennWell. New Orleans, Louisiana. February 4, 2009.

184. "Gulf Coast Energy Outlook." (2008.) Atmos Energy Regional Management Meeting. Louisiana and Mississippi Division. New Orleans, Louisiana. October 8, 2008.

185. "Background, Issues, and Trends in Underground Hydrocarbon Storage." (2008). Presentation before the LSU Center for Energy Studies Industry Advisory Board Meeting. Baton Rouge, Louisiana. August 27, 2008.

186. "Greenhouse Gas Regulations and Policy: Implications for Louisiana." (2008). Presentation before the Praxair Customer Seminar. Houston, Texas, August 14, 2008.

187. "Market and Regulatory Issues in Alternative Energy and Louisiana Initiatives." (2008). Presentation before the 2008 Statewide Clean Cities Coalition Conference: Making Sense of Alternative Fuels and Advanced Technologies. New Orleans, Louisiana, March 27, 2008.

188. "Regulatory Issues in Rate Design, Incentives, and Energy Efficiency." (2007) Presentation before the New Hampshire Public Utilities Commission. Workshop on Energy Efficiency and Revenue Decoupling. November 7, 2007.

189. "Regulatory Issues for Consumer Advocates in Rate Design, Incentives, and Energy

Efficiency." (2007). National Association of State Utility Consumer Advocates, Mid-Year Meeting. June 12, 2007.

190. "Regulatory and Policy Issues in Nuclear Power Plant Development." (2007). LSU Center for Energy Studies Industry Advisory Council Meeting. Baton Rouge, LA. March 23, 2007.

191. "Oil and Gas in the Gulf of Mexico: A North American Perspective." (2007). Canadian Consulate, Heads of Mission EnerNet Workshop, Houston, Texas. March 20, 2007.

192. "Regulatory Issues for Consumer Advocates in Rate Design, Incentives & Energy Efficiency. (2007). National Association of State Utility Consumer Advocates ("NASUCA") Gas Committee Monthly Meeting. February 13, 2006.

193. "Recent Trends in Natural Gas Markets." (2006). National Association of Regulatory Utility Commissioners, 118th Annual Convention. Miami, FL November 14, 2006.

194. "Energy Markets: Recent Trends, Issues & Outlook." (2006). Association of Energy Service Companies (AESC) Meeting. Petroleum Club, Lafayette, LA, November 8, 2006.

195. "Energy Outlook" (2006). National Business Economics Issues Council. Quarterly Meeting, Nashville, TN, November 1-2, 2006.

196. "Global and U.S. Energy Outlook." (2006). Energy Virginia Conference. Virginia Military Institute, Lexington, VA October 17, 2006.

197. "Interdependence of Critical Energy Infrastructure Systems." (2006). Cross Border Forum on Energy Issues: Security and Assurance of North American Energy Systems. Woodrow Wilson Center for International Scholars. Washington, DC, October 13, 2006.

198. "Determining the Economic Value of Coastal Preservation and Restoration on Critical Energy Infrastructure." (2006) The Economic and Market Impacts of Coastal Restoration: America's Wetland Economic Forum II. Washington, DC September 28, 2006.

199. "Relationships between Power and Other Critical Energy Infrastructure." (2006). Rebuilding the New Orleans Region: Infrastructure Systems and Technology Innovation Forum. United Engineering Foundation. New Orleans, LA, September 24-25, 2006.

200. "Outlook, Issues, and Trends in Energy Supplies and Prices." (2006.) Presentation to the Southern States Energy Board, Associate Members Meeting. New Orleans, Louisiana. July 14, 2006.

201. "Energy Sector Outlook." (2006). Baton Rouge Country Club Meeting. Baton Rouge, Louisiana. July 11, 2006.

202. "Oil and Gas Industry Post 2005 Storm Events." (2006). American Petroleum Institute, Teche Chapter. Production, Operations, and Regulations Annual Meeting. Lafayette, Louisiana. June 29, 2006.

203. "Concentration of Energy Infrastructure in Hurricane Regions." (2006). Presentation before the National Commission on Energy Policy Forum: Ending the Stalemate on LNG Facility Siting. Washington, DC. June 21, 2006.

204. "LNG—A Premier." (2006). Presentation Given to the U.S. Department of Energy's "LNG Forums." Los Angeles, California. June 1, 2006.

205. "Regional Energy Infrastructure, Production and Outlook." (2006). Executive Briefing for

Board of Directors, Louisiana Oil and Gas Plc., Enhanced Exploration, Inc. and Energy Self-Service, Inc. Covington, Louisiana, May 12, 2006.

206. "The Impacts of the Recent Hurricane Season on Energy Production and Infrastructure and Future Outlook." Presentation before the Industrial Energy Technology Conference 2006. New Orleans, Louisiana, May 9, 2006.

207. "Update on Regional Energy Infrastructure and Production." (2006). Executive Briefing for Delegation Participating in U.S. Department of Commerce Gulf Coast Business Investment Mission. Baton Rouge, Louisiana May 5, 2006.

208. "Hurricane Impacts on Energy Production and Infrastructure." (2006). Presentation before the Interstate Natural Gas Association of America Mid-Year Meeting. Hyatt Regency Hill Country. April 21, 2006.

209. "LNG—A Premier." Presentation Given to the U.S. Department of Energy's "LNG Forums." Astoria, Washington. April 28, 2006.

210. Natural Gas Market Outlook. Invited Presentation Given to the Georgia Public Service Commission and Staff. Georgia Institute of Technology, Atlanta, Georgia. March 10, 2006.

211. The Impacts of Hurricanes Katrina and Rita on Louisiana's Energy Industry. Presentation to the Louisiana Economic Development Council. Baton Rouge, Louisiana. March 8, 2006.

212. Energy Markets: Hurricane Impacts and Outlook. Presentation to the 2006 Louisiana Independent Oil and Gas Association Annual Conference. L'Auberge du Lac Resort and Casino. Lake Charles, Louisiana. March 6, 2006

213. Energy Market Outlook and Update on Hurricane Damage to Energy Infrastructure. Presentation to the Energy Council 2005 Global Energy and Environmental Issues Conference. Santa Fe, New Mexico, December 10, 2005.

214. "Putting Our Energy Infrastructure Back Together Again." Presentation Before the 117th Annual Convention of the National Association of Regulatory Utility Commissioners (NARUC). November 15, 2005. Palm Springs, CA

215. "Hurricanes and the Outlook for Energy Markets." Presentation before the Baton Rouge Rotary Club. November 9, 2005, Baton Rouge, LA.

216. "Hurricanes, Energy Supplies and Prices." Presentation before the Louisiana Department of Natural Resources and Atchafalaya Basin Committee Meeting. November 8, 2005. Baton Rouge, LA.

217. "The Impact of the Recent Hurricane's on Louisiana's Energy Industry." Presentation before the Louisiana Independent Oil and Gas Association Board of Directors Meeting. November 8, 2005. Baton Rouge, LA.

218. "The Impact of the Recent Hurricanes on Louisiana's Infrastructure and National Energy Markets." Presentation before the Baton Rouge City Club Distinguished Speaker Series. October 13, 2005. Baton Rouge, LA.

219. "The Impact of the Recent Hurricanes on Louisiana's Infrastructure and National Energy Markets." Presentation before Powering Up: A Discussion About the Future of Louisiana's

Energy Industry. Special Lecture Series Sponsored by the Kean Miller Law Firm. October 13, 2005. Baton Rouge, LA.

220. "The Impact of Hurricane Katrina on Louisiana's Energy Infrastructure and National Energy Markets." Special Lecture on Hurricane Impacts, LSU Center for Energy Studies, September 29, 2005.

221. "Louisiana Power Industry Overview." Presentation before the Clean Air Interstate Rule Implementation Stakeholders Meeting. August 11, 2005. Louisiana Department of Environmental Quality.

222. "CES 2005 Legislative Support and Outlook for Energy Markets and Policy." Presentation before the LMOGA/LCA Annual Post-Session Legislative Committee Meeting. August 10-13, 2005. Perdido Key, Florida.

223. "Electric Restructuring: Past, Present, and Future." Presentation to the Southeastern Association of Tax Administrators Annual Conference. Sheraton Hotel and Conference Facility. New Orleans, LA July 12, 2005.

224. "The Outlook for Energy." Lagniappe Studies Continuing Education Course. Baton Rouge, LA. July 11, 2005.

225. "The Outlook for Energy." Sunshine Rotary Club. Baton Rouge, LA. April 27, 2005.

226. "Background and Overview of LNG Development." Energy Council Workshop on LNG/CNG. Biloxi, Ms: Beau Rivage Resort and Hotel, April 9, 2005.

227. "Natural Gas Supply, Prices, and LNG: Implications for Louisiana Industry." Cytec Corporation Community Advisory Panel. Fortier, LA January 14, 2005.

228. "The Economic Opportunities for a Limited Industrial Retail Choice Plan." Louisiana Department of Economic Development. Baton Rouge, Louisiana. November 19, 2004.

229. "Energy Issues for Industrial Customers of Gas and Power." Louisiana Association of Business and Industry, Energy Council Meeting. Baton Rouge, Louisiana. October 11, 2004.

230. "Energy Issues for Industrial Customers of Gas and Power." Annual Meeting of the Louisiana Chemical Association and the Louisiana Chemical Industry Alliance. Point Clear, Alabama. October 8, 2004.

231. "Energy Issues for Industrial Customers of Gas and Power." American Institute of Chemical Engineers – New Orleans Section. New Orleans, LA. September 22, 2004.

232. "Natural Gas Supply, Prices and LNG: Implications for Louisiana Industry." Dow Chemical Company Community Advisory Panel Meeting. Plaquemine, LA. August 9, 2004.

233. "Energy Issues for Industrial Customers of Gas and Power." Louisiana Chemical Association Post-Legislative Meeting. Springfield, LA. August 9, 2004.

234. "LNG In Louisiana." Joint Meeting of the Louisiana Economic Development Council and the Governors Cabinet Advisory Council. Baton Rouge, LA. August 5, 2004.

235. "Louisiana Energy Issues." Louisiana Mid-Continent Oil and Gas Association Post Legislative Meetings. Sandestin, Florida. July 28, 2004.

236. "The Gulf South: Economic Opportunities Related to LNG." Presentation before the Energy Council's 2004 State and Provincial Energy and Environmental Trends Conference. Point Clear, AL, June 26, 2004.

237. "Natural Gas and LNG Issues for Louisiana." Presentation before the Rhodia Community Advisory Panel. May 20, 2004, Baton Rouge, LA.

238. "The Economic Opportunities for LNG Development in Louisiana." Presentation before the Louisiana Chemical Association Plant Managers Meeting. May 27, 2004. Baton Rouge, LA.

239. The Economic Opportunities for LNG Development in Louisiana." Presentation before the Louisiana Chemical Association/Louisiana Chemical Industry Alliance Legislative Conference. May 26, 2004. Baton Rouge, LA.

240. "The Economic Opportunities for LNG Development in Louisiana." Presentation before the Petrochemical Industry Cluster, Greater New Orleans, Inc. May 19, 2004, Destrehan, LA.

241. "Industry Development Issues for Louisiana: LNG, Retail Choice, and Energy." Presentation before the LSU Center for Energy Studies Industry Associates. May 14, 2004, Baton Rouge, LA.

242. "The Economic Opportunities for LNG Development in Louisiana." Presentation before the Board of Directors, Greater New Orleans, Inc. May 13, 2004, New Orleans, LA.

243. "Natural Gas Outlook: Trends and Issues for Louisiana." Presentation before the Louisiana Joint Agricultural Association Meetings. January 14, 2004, Hotel Acadiana, Lafayette, Louisiana.

244. "Natural Gas Outlook" Presentation before the St. James Parish Community Advisory Panel Meeting. January 7, 2004, IMC Production Facility, Convent, Louisiana.

245. "Competitive Bidding in the Electric Power Industry." Presentation before the Association of Energy Engineers. Business Energy Solutions Expo. December 11-12, 2003, New Orleans, Louisiana.

246. "Regional Transmission Organization in the South: The Demise of SeTrans" Presentation before the LSU Center for Energy Studies Industry Associates Advisory Council Meeting. December 9, 2003. Baton Rouge, Louisiana.

247. "Affordable Energy: The Key Component to a Strong Economy." Presentation before the National Association of Regulatory Utility Commissioners ("NARUC"), November 18, 2003, Atlanta, Georgia.

248. "Natural Gas Outlook." Presentation before the Louisiana Chemical Association, October 17, 2003, Pointe Clear, Alabama.

249. "Issues and Opportunities with Distributed Energy Resources." Presentation before the Louisiana Biomass Council. April 17, 2003, Baton Rouge, Louisiana.

250. "What's Happened to the Merchant Energy Industry? Issues, Challenges, and Outlook" Presentation before the LSU Center for Energy Studies Industry Associates Advisory Council Meeting. November 12, 2002. Baton Rouge, Louisiana.

251. "An Introduction to Distributed Energy Resources." Presentation before the U.S. Department of Energy, Office of Renewable Energy and Energy Efficiency, State Energy Program/Rebuild America Conference, August 1, 2002, New Orleans, Louisiana.

252. "Merchant Energy Development Issues in Louisiana." Presentation before the Program Committee of the Center for Legislative, Energy, and Environmental Research (CLEER), Energy Council. April 19, 2002.

253. "Merchant Power Plants and Deregulation: Issues and Impacts." Presentation before 24th Annual Conference on Waste and the Environment. Sponsored by the Louisiana Department of Environmental Quality. Lafayette, Louisiana, Cajundome. March 18, 2002.

254. "Merchant Power and Deregulation: Issues and Impacts." Presentation before the Air and Waste Management Association Annual Meeting. Baton Rouge, LA, November 15, 2001.

255. "Moving to the Front of the Lines: The Economic Impact of Independent Power Production in Louisiana." Presentation before the LSU Center for Energy Studies Merchant Power Generation and Transmission Conference, Baton Rouge, LA. October 11, 2001.

256. "Economic Impacts of Merchant Power Plant Development in Mississippi." Presentation before the U.S. Oil and Gas Association Annual Oil and Gas Forum. Jackson, Mississippi. October 10, 2001.

257. "Economic Opportunities for Merchant Power Development in the South." Presentation before the Southern Governor's Association/Southern State Energy Board Meetings. Lexington, KY. September 9, 2001.

258. "The Changing Nature of the Electric Power Business in Louisiana." Presentation before the Louisiana Department of Environmental Quality. Baton Rouge, LA, August 27, 2001.

259. "Power Business in Louisiana: Background and Issues." Presentation before the Louisiana Interagency Group on Merchant Power Development . Baton Rouge, LA, July 16, 2001.

260. "The Changing Nature of the Electric Power Business in Louisiana: Background and Issues." Presentation before the Louisiana Office of the Governor. Baton Rouge, LA, July 16, 2001.

261. "The Changing Nature of the Electric Power Business in Louisiana: Background and Issues." Presentation before the Louisiana Department of Economic Development. Baton Rouge, LA, July 3, 2001.

262. "The Economic Impacts of Merchant Power Plant Development In Mississippi." Presentation before the Mississippi Public Service Commission. Jackson, Mississippi, March 20, 2001.

263. "Energy Conservation and Electric Restructuring." With Ritchie D. Priddy. Presentation before the Louisiana Department of Natural Resources. Baton Rouge, Louisiana, October 23, 2000.

264. "Pricing and Regulatory Issues Associated with Distributed Energy." Joint Conference by Econ One Research, Inc., the Louisiana State University Distributed Energy Resources Initiative, and the University of Houston Energy Institute: "Is the Window Closing for Distributed Energy?" Houston, Texas, October 13, 2000.

265. "Electric Reliability and Merchant Power Development Issues." Technical Meetings of the Louisiana Public Service Commission. Baton Rouge, LA. August 29, 2000.

266. "A Introduction to Distributed Energy Resources." Summer Meetings, Southeastern Association of Regulatory Utility Commissioners (SEARUC). New Orleans, LA. June 27, 2000.

267. Roundtable Moderator/Discussant. Mid-South Electric Reliability Summit. U.S. Department of Energy. New Orleans, Louisiana. April 24, 2000.

268. "Electricity 101: Definitions, Precedents, and Issues." Energy Council's 2000 Federal Energy and Environmental Matters Conference. Loews L'Enfant Plaza Hotel, Washington, D.C. March 11-13, 2000.

269. "LSU/CES Distributed Energy Resources Initiatives." Los Alamos National Laboratories. Office of Energy and Sustainable Systems. Los Alamos, New Mexico. February 16, 2000.

270. "Distributed Energy Resources Initiatives." Louisiana State University, Center for Energy Studies Industry Associates Meeting. Baton Rouge, Louisiana. December 15, 1999.

271. "Merchant Power Opportunities in Louisiana." Louisiana Mid-Continent Oil and Gas Association (LMOGA) Power Generation Committee Meetings. Baton Rouge, Louisiana. November 10, 1999.

272. Roundtable Discussant. "Environmental Regulation in a Restructured Market" The Big E: How to Successfully Manage the Environment in the Era of Competitive Energy. PUR Conference. New Orleans, Louisiana. May 24, 1999.

273. "The Political Economy of Electric Restructuring In the South" Southeastern Electric Exchange, Rate Section Annual Conference. New Orleans, Louisiana. May 7, 1999.

274. "The Dynamics of Electric Restructuring in Louisiana." Joint Meeting of the American Association of Energy Engineers and the International Association of Facilities Managers. Metairie, Louisiana. April 29, 1999.

275. "The Implications of Electric Restructuring on Independent Oil and Gas Operations." Petroleum Technology Transfer Council Workshop: Electrical Power Cost Reduction Methods in Oil and Gas Field Operations. Lafayette, Louisiana, March 24, 1999.

276. "What's Happened to Electricity Restructuring in Louisiana?" Louisiana State University, Center for Energy Studies Industry Associates Meeting. March 22, 1999.

277. "A Short Course on Electric Restructuring." Central Louisiana Electric Company. Sales and Marketing Division. Mandeville, Louisiana, October 22, 1998.

278. "The Implications of Electric Restructuring on Independent Oil and Gas Operations." Petroleum Technology Transfer Council Workshop: Electrical Power Cost Reduction Methods in Oil and Gas Field Operations. Shreveport, Louisiana, October 13, 1998.

279. "How Will Utility Deregulation Affect Tourism." Louisiana Travel Promotion Association Annual Meeting, Alexandria, Louisiana. January 15, 1998.

280. "Reflections and Predictions on Electric Utility Restructuring in Louisiana." With Fred I. Denny. Louisiana State University, Center for Energy Studies Industry Associates Meeting. November 20, 1997.

281. "Electric Utility Restructuring in Louisiana." Hammond Chamber of Commerce, Hammond, Louisiana. October 30, 1997.

282. "Electric Utility Restructuring." Louisiana Association of Energy Engineers. Baton Rouge, Louisiana. September 11, 1997.

283. "Electric Utility Restructuring: Issues and Trends for Louisiana." Opelousas Chamber of Commerce, Opelousas, Louisiana. June 24, 1997.

284. "The Electric Utility Restructuring Debate In Louisiana: An Overview of the Issues." Annual Conference of the Public Affairs Research Council of Louisiana. Baton Rouge, Louisiana. March 25, 1997.

285. "Electric Restructuring: Louisiana Issues and Outlook for 1997." Louisiana State University, Center for Energy Studies Industry Associates Meeting, Baton Rouge, Louisiana, January 15, 1997.

286. "Restructuring the Electric Utility Industry." Louisiana Propane Gas Association Annual Meeting, Alexandria, Louisiana, December 12, 1996.

287. "Deregulating the Electric Utility Industry." Eighth Annual Economic Development Summit, Baton Rouge, Louisiana, November 21, 1996.

288. "Electric Utility Restructuring in Louisiana." Jennings Rotary Club, Jennings, Louisiana, November 19, 1996.

289. "Electric Utility Restructuring in Louisiana." Entergy Services, Transmission and Distribution Division, Energy Centre, New Orleans, Louisiana, September 12, 1996

290. "Electric Utility Restructuring" Louisiana Electric Cooperative Association, Baton Rouge, Louisiana, August 27, 1996.

291. "Electric Utility Restructuring -- Background and Overview." Louisiana Public Service Commission, Baton Rouge, Louisiana, August 14, 1996.

292. "Electric Utility Restructuring." Sunshine Rotary Club Meetings, Baton Rouge, Louisiana, August 8, 1996.

293. Roundtable Moderator, "Stakeholder Perspectives on Electric Utility Stranded Costs." Louisiana State University, Center for Energy Studies Seminar on Electric Utility Restructuring in Louisiana, Baton Rouge, May 29, 1996.

294. Panelist, "Deregulation and Competition." American Nuclear Society: Second Annual Joint Louisiana and Mississippi Section Meetings, Baton Rouge, Louisiana, April 20, 1996.

EXPERT WITNESS, LEGISLATIVE, AND PUBLIC TESTIMONY; EXPERT REPORTS, RECOMMENDATIONS, AND AFFIDAVITS

1. Expert Report. (2023). *Alternative regulation deficiencies and potential ratepayer harms*. On Behalf of the Office of the Consumer Advocate of Iowa. October 3, 2023.

2. Expert Testimony. (2023). Before the Public Service Commission of the State of Montana. *In the Matter of Energy West Montana's Application for Approval of Gas Cost Hedging Plan for West Yellowstone.* On Behalf of the Montana Consumer Counsel. Issues: gas hedging program.

3. Legislative Testimony. (2023). Ratepayer harms from alternative regulation in Oklahoma. Appearing on the Behalf of the Petroleum Alliance of Oklahoma. October 23, 2023.

4. Expert Testimony. Cause No. 45911. (2023). Before the State of Indiana Utility Regulatory Commission. *Petition of Indianapolis Power & Light Company D/B/A AES Indiana ("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*. On Behalf of Indiana Office of Utility Consumer Counselor. Direct and Cross-Answering. Issues: allocated cost of service, revenue distribution, rate design, trackers.

5. Expert Testimony. Docket No. 23-06007. (2023). Before the Public Utilities Commission of Nevada. *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), addressing its annual revenue requirement for general rates charged to all classes of electric customers.* On Behalf of the Nevada Bureau of Consumer Protection. Issues: marginal cost of service study, embedded cost of service study, revenue distribution, rate design.

6. Expert Testimony. Docket No. UE-230172. (2023). Before the Washington Utilities and Transportation Commission. *Washington Utilities and Transportation Commission, Complainant v. Pacificorp dba Pacific Power & Light Company, Respondent.* On Behalf of the Washington State Office of the Attorney General Public Counsel Unit. Issues: rate design, revenue distribution, cost of service.

7. Expert Testimony. Case No. U-21389. (2023). Before the Michigan Public Service Commission. *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*. On Behalf of the Michigan Department of the Attorney General. Issues: capital expenditure adjustments, overview of proposal.

8. Expert Report. Case No. 22-1094-WW-AIR. (2023). *Audit of the Application to Increase Rates of Aqua Ohio, Inc. For the Period July 1, 2022 through June 30, 2023.* Prepared for the Public Utilities Commission of Ohio. Issues: cost of service, billing determinants, revenue distribution, rate design.

9. Expert Report. Case No. 22-1096-ST-AIR. (2023). *Audit of the Application to Increase Rates of Aqua Ohio Wastewater, Inc. For the period July 1, 2022 through June 30, 2023*. Prepared for the Public Utilities Commission of Ohio. Issues: cost of service, billing determinants, revenue distribution, rate design.

10. Expert Testimony. Docket No. 2023-70-G. (2023). Before the Public Service Commission of South Carolina. *In the Matter of: Dominion Energy South Carolina, Inc's application for adjustments in its natural gas rate schedules and tariffs.* On Behalf of the South Carolina Department of Consumer Affairs. Issues: revenue credit, revenue distribution, rate design. Direct and Surrebuttal.

11. Expert Testimony. Docket No. E-01345A-22-0144. (2023). Before the Arizona Corporation Commission. *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, and to approve rate schedules*

designed to develop such return. On Behalf of the Utilities Division Arizona Corporation Commission. Issues: cost of service, revenue distribution, rate design. Direct and Surrebuttal.

12. Expert Testimony. Docket No. 23-0068 (consol.) 23-0069. (2023). Before the Illinois Commerce Commission. *North Shore Gas Company, The Peoples Gas Light and Coke Company Proposed general increase in rates and revisions to service classifications, riders and terms and conditions of service.* On Behalf of the People of the State of Illinois. Issues: integrity management, infrastructure metrics, natural gas policy, state gas policy.

13. Expert Testimony. Docket No. 23-067. (2023). Before the Illinois Commerce Commission. *Ameren Illinois Company Proposed general increase in gas delivery service rates.* On Behalf of the Illinois Attorney General. Issues: integrity management, infrastructure metrics, natural gas policy, state gas policy.

14. Expert Testimony. Docket No. 23-066. (2023). Before the Illinois Commerce Commission. *Northern Illinois Gas Company d/b/a Nicor Gas Company Proposed general increase in gas rates.* On Behalf of the People of the State of Illinois. Issues: integrity management, infrastructure metrics, natural gas policy, state gas policy.

15. Expert Testimony. Docket No. U-22-081. (2023). Before the Regulatory Commission of Alaska. *In the Matter of the Revenue Requirement Study Designated as TA334-4 Filed by Enstar Natural Gas Company, A Division of SEMCO Energy, Inc.* On Behalf of the Attorney General, Regulatory Affairs & Public Advocacy Section. Issues: cost of service, rate design, revenue distribution.

16. Expert Testimony. Docket No. U-22-078. (2023). Before the Regulatory Commission of Alaska. *In the Matter of the Revenue Requirement Study and Tariff Filing Designated as TA510-1 Filed by Alaska Electric Light & Power Company.* On Behalf of the Office of the Attorney General, Regulatory Affairs & Public Advocacy Section. Issues: cost of service, rate design, seasonal rates, revenue allocation, customer charge.

17. Expert Testimony. Docket No. 2022.11.099. (2023). Before the Department of Public Service Regulation. *In the Matter of Montana-Dakota Utilities Co. for Authority to Establish Increased Rates for Electric Service.* On Behalf of the Montana Consumer Counsel. Direct and Cross-Answering. Issues: rate increase, cost of service study, marginal cost of service, revenue allocation, rate design.

18. Expert Testimony. Docket No. U-22-078. (2023). Before the Regulatory Commission of Alaska. *In the Matter of the Revenue Requirement Study and Tariff Filing Designated as TA510-1 Filed by Alaska Electric Light & Power Company.* On Behalf of the Office of the Attorney General, Regulatory Affairs & Public Advocacy Section. Issues: rate design, cost of service, revenue allocation, seasonal rates.

19. Expert Testimony. Docket No. U-21193. (2023). Before the Michigan Public Service Commission. *In the matter of the Application of DTE Electric Company for Approval of its Integrated Resource Plan pursuant to MCL 460.6t, and for other relief.* On Behalf of the Michigan Department of the Attorney General. Issues: Resource planning, coal retirements, asset amortization, financial compensation mechanism.

20. Expert Testimony. Docket No. RP22-1033. (2023). Before the Federal Energy Regulatory Commission. *Northern Natural Gas Company.* On Behalf of the Northern Municipal Distributors Group and the Midwest Region Gas Task Force Association. Issues: tariff

provisions, rate analysis, discount adjustment.

21. Expert Testimony. Docket No. 22-061-U. (2023). Before the Arkansas Public Service Commission. *In the Matter of an Investigation into Potential Cost Shifting Associated with Net Metering.* On Behalf of the Office of Tim Griffin, Attorney General of Arkansas. Issues: policy, net metering background.

22. Expert Testimony. Docket No. 22F-0263EG. (2023). Before the Public Utility Commission of the State of Colorado. *Olson's Greenhouses of Colorado, LLC. Complainant, v. Public Service Company of Colorado Respondent*. On Behalf of Olson's Greenhouses of Colorado, LLC. Issues: reliability, system upgrades, weather normalization.

23. Expert Testimony. Docket No. 2022.07.078. (2022). Before the Public Service Commission of the State of Montana. *In the Matter of NorthWestern Energy's Application for Authority to Increase Retail Electric and Natural Gas Utility Rates and for Approval of Electric and Natural Gas Service Schedules and Rules and Allocated Cost of Service and Rate Design.* On Behalf of the Montana Consumer Counsel. Direct and Cross-Intervenor. Issues: riders, fixed cost recovery mechanism, power cost adjustment, cost of service, revenue distribution.

24. Expert Testimony. Docket No 2022-254-E. (2022). Before the Public Service Commission of South Carolina. *In the Matter of: Application of Duke Energy Progress, LLC for Authority to Adjust and Increase its Electric Rates and Charges.* On Behalf of South Carolina Department of Consumer Affairs. Direct and Surrebuttal. Issues: Cost of service, revenue allocation, rate design.

25. Expert Testimony Docket No. 22-06014. (2022). *Before the Public Utilities Commission of Nevada. 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*. On Behalf of the Nevada Bureau of Consumer Protection. Issues: rate design, cost of services, marginal cost of service, revenue distribution.

26. Expert Testimony Docket No. 2022.06.067. (2022). *Before the Public Service Commission of the State of Montana. In RE NorthWestern Energy's Application for an Advanced Metering Opt-Out Tariff.* On Behalf of the Montana Consumer Counsel. Direct and Rebuttal. Issues: meter issues, opt-out fees, tariffs options.

27. Expert Testimony Docket No. 16-036-FR. (2022). *Before the Arkansas Public Service Commission. In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, INC., Pursuant to APSC Docket NO. 15-015-U. On Behalf of the Arkansas Attorney General Leslie Rutledge.* Issues: Rate design, netting adjustment, performance standards, projected year adjustments.

28. Expert Testimony Formal Case No. 1169. (2022). *Before the Public Service Commission of the District of Columbia. In the Matter of the application of Washington Gas Light Company for authority to increase existing rates and charges for gas service.* On Behalf of the People's Counsel for the District of Columbia. Direct and Rebuttal. Issues: Revenue allocation, weather normalization, rate design.

29. Expert Testimony Case No. U-21224. (2022). *Before the Michigan Public Service Commission. 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*. On

Behalf of the Michigan Department of the Attorney General. Issues: cost of service, revenue distribution, policy overview.

30. Expert Report. Case No. 695287. (2022). Before the Nineteenth Judicial District Court, The Parish of East Baton Rouge, State of Louisiana. *Washington-St. Tammany Electric Cooperative, Inc. and Claiborne Electric Cooperative, Inc., Plaintiff v. Louisiana Generating, L.L.C., Defendant.* On Behalf of Louisiana Generating, L.L.C. Issues: environmental regulations, re-fueling, regulatory rules, collateral benefits.

31. Expert Report. Case No. 0:20-cv-60981-AMC. (2022). *Café, Gelato & Panini LLC, d/b/a Café Gelato Panini, on behalf of itself and all others similarly situated, Plaintiff v. Simon Property Group, Inc., Simon Property Group, L.P., M. S. Management Associates, Inc. And The Town Center at Boca Raton Trust, Defendant.* On Behalf of Simon Property Group, Inc.

32. Expert Testimony Case No. U-20836. (2022). *Before the Michigan Public Service Commission. 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.* On Behalf of the Michigan Department of the Attorney General. Issues: cost of service, revenue distribution, peer comparison.

33. Expert Testimony. D.P.U. 22-22. (2022*). Before the Department of Public Utilities of the Commonwealth of Massachusetts. Petition of NSTAR Electric Company d/b/a Eversource Energy for Approval of a Performance-Based Ratemaking Plan and Increase in Base Distribution Rates for Electric Service Pursuant to G.L. c. 164, §94 and 220 C.M.R. §5.00.* On Behalf of Massachusetts Office of the Attorney General Office of Ratepayer Advocacy. Issues: rate design, TFP analysis, rate increases, benchmark analysis, revenue distribution. Direct and Surrebuttal.

34. Expert Testimony. Docket No. 21-097-U. (2022). In the Matter of the Application of Black Hills Energy Arkansas, Inc. for Approval of a General Change in Rates and Tariffs. On Behalf of the Office of Arkansas Attorney General. Issues: cost of service, rate design, reliability, billing determinant adjustment.

35. Expert Testimony. Docket No. 2021-361-G. (2022). Before the Public Service Commission of South Carolina. *In the Matter of: Dominion Energy South Carolina, Inc.'s Request for Approval of New Natural Gas Energy Efficiency Programs*. On Behalf of South Carolina Department of Consumer Affairs. Issues: DSM Rider, energy efficiency, shared savings. Direct and Surrebuttal.

36. Expert Report. Case No. 21-596-ST-AIR. (2022). *Audit of the Application to Increase Rates of Aqua Ohio Wastewater, Inc. For the Period January 1, 2021 through December 31, 2021*. Prepared for Public Utilities Commission of Ohio. Issues: rate design, cost of service, revenue distribution.

37. Expert Report. Case No. 21-595-WW-AIR. (2022). *Audit of the Application to Increase Rates of Aqua Ohio, Inc. For the Period January 1, 2021 through December 31, 2021.* Prepared for Public Utilities Commission of Ohio. Issues: rate design, cost of service, revenue distribution.

38. Expert Testimony. Docket No. 2021.09.112. (2022). *Before the Public Service Commission of the State of Montana. In the Matter of NorthWestern Energy's Annual*

PCCAM Filing and Application for Approval of Tariff Changes. On Behalf of the Montana Consumer Counsel. Issues: wholesale energy hedging, market exposure, overview of PCCAM filing, demand side management costs.

39. Expert Affidavit. Docket No. 2:21-cv-1074. (2021). In the United States District Court for the Western District of Louisiana. *The State of Louisiana by and through its Attorney General, Jeff Landry et al. Plantiffs, v. Joseph R. Biden, Jr., in his official capacity as President of the United States; et al., Defendants.* On Behalf of the Attorney General of Louisiana. Issues: social cost of carbon, carbon tax, environmental policy.

40. Expert Testimony. Case No. U21090. (2021). *Before the Michigan Public Service Commission. In the matter of the application of Consumers Energy Company for approval of its Integrated Resource Plan pursuant to MCL 460.6t, certain accounting approvals, and for other relief*. On Behalf of the Michigan Department of the Attorney General. Issues: IRP, coal plant retirements, acquisition premiums, financial compensation mechanism.

41. Expert Testimony. Docket No 16-036-FR. (2021). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U*. On Behalf of the Office of Arkansas Attorney General Leslie Rutledge. Issues: netting adjustments, rate increases, projected year adjustments, reliability.

42. Expert Report. Docket JCCP No. 4861. (2021). Before the Superior Court of the State of California County of Los Angeles, Central Civil West. *Coordination Proceeding Special Title [Rule 3.550] Southern California Gas Leak Cases.* On Behalf of Toll Brothers. Issues: gas leak, public service obligation, integrity management.

43. Expert Testimony. Docket No. U-35927. (2021). Before the Louisiana Public Service Commission. *In Re: Application of 1803 Electric Cooperative, Inc. for Approval of Power Purchase Agreements and for Cost Recovery.* Direct and Cross-Answering. On Behalf of Cleco Cajun LLC. Issues: tolling agreements, generation acquisition, risk factors.

44. Expert Testimony. Docket No. 21-060-U. (2021). Before the Arkansas Public Service Commission. *In the Matter of Joint Application of Centerpoint Energy Resources Corp. and Summit Utilities Arkansas, Inc. For all Necessary Authorizations and Approvals for Summit Utilities Arkansas, Inc. To Acquire the Arkansas Assets of Centerpoint Energy Resources Corp. and for Approval of a Certificate of Public Convenience and necessity for Summit Utilities Arkansas, Inc.* Direct and Surrebuttal. On Behalf of the Office of Arkansas Attorney General Leslie Rutledge. Issues: asset acquisition, ratepayer benefits, acquisition synergies, Rider FRP.

45. Expert Affidavit. Civil Action No. 2:21-cv-00778 (2021). Before the United States District Court for the Western District of Louisiana. *The State of Louisiana v. Joseph R. Biden, Jr.* Issues: leasing and drilling moratorium, state revenue, coastal restoration, economic activity.

46. Expert Testimony. Docket No. 21-044-U (2021). Before the Arkansas Public Service Commission. *In the Matter of Centerpoint Energy Resources Corp. D/B/A Centerpoint Energy Arkansas Gas' Request to Extend Rider FRP.* On Behalf of the Office of Arkansas Attorney General Leslie Rutledge. Issues: ratepayer benefits, service quality, cost of service, FRP extension.

47. Expert Testimony. Docket No. 17-010-FR (2021). Before the Arkansas Public Service

Commission. *In the Matter of the Formula Rate Plan Filings of Centerpoint Energy Resources Corp. D/B/A Centerpoint Energy Arkansas Gas Pursuant to APSC Docket No. 15-098-U.* On Behalf of the Office of Arkansas Attorney General Leslie Rutledge. Issues: rate increase, investment and expense trends, revenue deficiency, leak performance.

48. Expert Testimony. Case No. U-20963 (2021). Before the Michigan Public Service Commission. *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.* On Behalf of the Michigan Department of the Attorney General. Issues: cost of service, peak allocation, revenue distribution.

49. Expert Testimony. U-20-072, U-20-073, U-20-074. (2021). Before the Regulatory Commission of Alaska. *In the Matter of the Revenue Requirement study and Tariff Filing designated as TA886-2 filed by Alaska Power Company, In the Matter of the Revenue Requirement study and Tariff filing designated as TA6-521 filed by Goat Lake Hydro, Inc., In the Matter of the Revenue Requirement study and Tariff filing designated as TA4-573 filed by BBL Hydro, Inc.* On Behalf of the Alaska Office of Attorney General. Issues: rate groups, cost of service.

50. Expert Testimony. Docket No. P20-001. (2021). Before the Louisiana Pilotage Fee Commission. *In Re: Request for Increase in Approved Pilot Complement; Increased Funding for necessary Additional Manpower; Upward Adjustment of Estimated Average Annual Pilot Compensation; and Related Relief Pursuant to LA R.S. 34:112.* On Behalf of the Louisiana Chemical Association (LCA) and Louisiana Mid-Continent Oil & Gas Association (LMOGA). Issues: unreasonable requests, fee structure, economic impact, over earnings.

51. Expert Testimony. D.P.U. 20-120. (2021). Before the Commonwealth of Massachusetts Before the Department of Public Utilities. *Petition of Boston Gas Company d/b/a National Grid Pursuant to G.L. c. 164, 94 and 220 C.M.R. 5.00 for Approval of an Increase in Base Distribution Rates and Approval of a Performance-Based Ratemaking Plan.* On Behalf of the Massachusetts Office of the Attorney General Office of Ratepayer Advocacy. Issues: rate increase, accelerated depreciation, benchmarking analysis, performance incentive mechanism.

52. Expert Testimony. RPU-2020-0001. (2020). Before the Iowa Utilities Board. *In Re: Iowa-American Water Company.* On Behalf of the Office of Consumer Advocate. Issues: rate increase, test trackers, RSM accounting ratemaking construct.

53. Expert Testimony. BPU Docket Nos. QO19010040 and GO20090622. (2020). Before the New Jersey Board of Public Utilities. *In the Matter of the Petition of New Jersey Natural Gas Company for Approval of Energy Efficiency Programs and the Associated Cost Recovery Mechanisms Pursuant to the Clean Energy Act, N.J.S.A. 48:3-87.8 et seq. and 48:3-98.1 et seq.* On behalf of the Division of Rate Counsel. Issues: CBA requirements, capacity benefits, volatility benefits.

54. Expert Testimony. Docket No. 2020-125-E. (2020). Before the Public Service Commission of South Carolina. *In the Matter of: Application of Dominion Energy South Carolina, Incorporated for Adjustments of Rates and Charges (See Commission Order No. 2020-313).* On Behalf of the South Carolina department of Consumer Affairs. Issues: cost of service, revenue allocation, rate design.

55. Answering Testimony. Before the United States of America Federal Energy Regulatory Commission. Docket No. RP20-614-000 and RP20-618-000. (2020). *Transcontinental Gas Pile Line Company, LLC.* On Behalf of the North Carolina Utilities Commission. Issues: Tariff revisions, assessment of Transco claims.

56. Expert Testimony. Docket No. 16-036-FR. (2020). *Before the Arkansas Public Service Commission. In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U. Direct and Surrebuttal*. On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: rate increases, investment and expenses trends, load forecast, historic year netting adjustment, reliability issues.

57. Expert Testimony. Docket No. 2019.12.101. (2020). Before the Public Service Commission of the State of Montana. *In the Matter of NorthWestern Energy's Application for Approval of Capacity Resource Acquisition.* On the Behalf of the Montana Consumer Counsel. Issues: sale of capital asset, evaluation benefits, ratepayer cost exposure, reserve fund.

58. Expert Testimony. Formal Case No. 1162. (2020). Before the Public Service Commission of the District of Columbia. *In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service*. On Behalf of the Office of the People's Counsel. Issues: rate increase, revenue adjustment, weather normalization, rate design, revenue distribution.

59. Expert Testimony. Docket No. E-01345A-19-0236. (2020). Before the Arizona Corporation Commission. *In the Matter of the Application of Arizona Public Service Company for Ratemaking Purposes to Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop such Return*. Direct and Surrebuttal. On Behalf of the Utilities Division of the Arizona Corporation Commission. Issues: Cost of Service, Revenue Distribution, Rate Design.

60. Expert Testimony. Docket No. 17-010-FR. (2020). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Centerpoint Energy Resources Corp. D/B/A Centerpoint Energy Arkansas Gas Pursuant to APSC Docket No. 15-098-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: rate increase, leak replacement and reduction, netting adjustment, revenue deficiency, accounting policy changes.

61. Expert Testimony. Case No. U-20697. (2020). Before the Michigan Public Service Commission. *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*. On Behalf of the Michigan Department of Attorney General. Issues: cost of service, revenue distribution, rate design.

62. Expert Testimony. Docket No. 2019.09.058. (2020). Before the Public Service Commission of the State of Montana. *In the Matter of NorthWestern Energy's Annual PCCAM Filing and Application for Approval of Tariff Changes*. On the Behalf of the Montana Consumer Counsel. Issues: purchase power expenses, cost sharing, PCAAM power cost.

63. Expert Testimony. Formal Case No. 1156. (2020). Before the Public Service Commission of the District of Columbia. *In the matter of Potomac Electric Power Company for authority to implement a multiyear rate plan for electric distribution service in the district of*

Columbia. Direct, Rebuttal, Surrebuttal, Supplemental, and Second Supplemental. On Behalf of the Office of the People's Counsel. Issues: revenue distribution, rate design, customer charge, performance metric policies, performance metric incentives.

64. Expert Testimony. Case No. U-20561. (2019). Before the Michigan Public Service Commission. *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*. On Behalf of the Michigan Department of Attorney General. Issues: Cost of service, allocation of production plant, allocation of sub-transmission plant, revenue distribution.

65. Expert Testimony. Cause No. 45253. (2019). Before the Indiana Utility Regulatory Commission. *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 Customers Classes*. On Behalf of the Indiana Office of Utility Consumer Counsel. Issues: Decoupling, revenue decoupling mechanism and design, commission policy, benchmarking analysis.

66. Expert Testimony. Docket 19-019-U. (2019). Before the Arkansas Public Service Commission. *In the Matter of the Petition of Entergy Arkansas, LLC for Approval of a Build-Own-Transfer Arrangement for a Renewable Resource and for all other Related Approvals.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues*:* Solar investment, risk assessment, proposed rider.

67. Expert Testimony. Docket No. 16-036-FR. (2019). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: rate design, reliability, and formula rate plan.

68. Expert Testimony. Docket No. 19-019-U. (2019). Before the Arkansas Public Service Commission. *In the Matter of the Petition of Entergy Arkansas, LLC for Approval of a Build-Own-Transfer Arrangement for a Renewable Resource and for all other Related Approvals*. On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: Solar project approval, ratepayer risk, cost allocation.

69. Expert Testimony. Docket No. 17-010-FR. (2019). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Centerpoint Energy Resources Corp. D/B/A Centerpoint Energy Arkansas Gas Pursuant to APSC Docket No. 15-098-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: retail rates, leak analysis, revenue deficiency, investments.

70. Expert Testimony. Case No. U-20471. (2019). Before the Michigan Public Service Commission. *In the matter of the Application of DTE Electric Company for approval of its Integrated Resource Plan pursuant to MCL 460.6t, and for other relief.* On Behalf of the Michigan Department of Attorney General. Issues: load forecasting, least-cost system planning.

71. Expert Report. Docket No. 18-004422. (2019). Before the State of Florida Division of Administrative Hearings. *Peoples Gas System vs. South Sumter Gas Company, LLC and the City of Leesburg.* On Behalf of the City of Leesburg. Issues: retail rates, customer growth, sales trends and forecasts, policy, cost of service, socio-economic trends and forecasts.

72. Expert Testimony. Docket Nos. GO18101112 and EO18101113. (2019). Before the New Jersey Board of Public Utilities. *In the Matter of the Public Service Electric and Gas Company for Approval of its Clean Energy Future-Energy Efficiency ("CEF-EE") Program on a Regulated Basis.* On behalf of the Division of Rate Counsel. Issues: economic impact, cost benefit analysis, decoupling mechanisms.

73. Expert Testimony. Docket Nos. EO18060629 and GO18060630. (2019). Before the New Jersey Board of Public Utilities. *In the Matter of the Public Service Electric and Gas Company for Approval of the Second Energy Strong Program (Energy Strong II)*. On behalf of the Division of Rate Counsel. Issues: economic impact, cost benefit analysis, infrastructure replacement, cost recovery tracker mechanisms.

74. Expert Report. Docket No. 2011-AD-2. (2019). On Behalf of the Mississippi Public Service Commission. *Order Establishing Docket to Investigate the Development and Implementation of Net Metering Programs and Standards.* On Behalf of the Mississippi Public Utilities Staff. Issues: Net-metering, distributed generation.

75. Expert Testimony. Docket No. D2018.2.12. (2018). Before the Public Service Commission of the State of Montana. *In the Matter of NorthWestern Energy's 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.* On Behalf of the Montana Consumer Counsel. Issues: Net-metering, cost of service, revenue distribution, rate design.

76. Expert Testimony. Docket No. 19-SEPE-054-MER. (2018). Before the Kansas Corporation Commission. *In the Matter of the Joint Application of Sunflower Electric Power Corporation and Mid-Kansas Electric Company, Inc. for an Order Approving the Merger of Mid-Kansas Electric Company, Inc. into Sunflower Electric Power Corporation*. On the Behalf of the Kansas Electric Power Cooperative, Inc. Issues: merger impacts, rates, tariffs.

77. Expert Testimony. Docket No. 18-046-FR. (2018). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Oklahoma Gas and Electric Company Pursuant to APSC Docket No. 16-052-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: formula rate plan, plant investment and expenses benchmarking analysis, reliability.

78. Expert Testimony. Docket No. 16-036-FR. (2018). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: rate design, reliability, and formula rate plan.

79. Expert Testimony. Docket No. 2017-AD-0112. (2018). Before the Mississippi Public Service Commission. *In Re: Encouraging Stipulation of Matters in Connection with the Kemper County IGCC Project.* On Behalf of the Mississippi Public Utilities Staff. Issues: cost of service and rate design.

80. Expert Affidavit. Docket No. 87011-E. (2018). Before the 16th Judicial District Court Parish of St. Martin State of Louisiana. *Bayou Bridge Pipeline, LLC versus 38.00 Acres, More or Less, Located in St. Martin Parish; Barry Scott Carline, et al.* Issues: economic impacts.

81. Expert Testimony. Docket No. QO18080843. (2018). Before the New Jersey Board of Public Utilities. *In the Matter of the Petition of Nautilus Offshore Wind, LLC for the Approval of the State Waters Wind Project and Authorizing Offshore Wind Renewable Energy Certificates.* On behalf of the Division of Rate Counsel. Issues: regulatory policy and cost-benefit analyses.

82. Expert Testimony. Docket No. ER18010029 and GR18010030. (2018). Before the New Jersey Board of Public Utilities. *In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 16 Electric and B.P.U.N.J No. 16 Gas, and for Changes in Depreciation Rates, Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief.* On behalf of the Division of Rate Counsel. Issues: rate proposal, revenue decoupling, regulatory policy, cost benchmarking.

83. Expert Testimony. Docket No. T-34695. (2018). Before the Louisiana Public Service Commission. *In re: Application for a rate increase on service originating at Grand isle and termination at St. James for Crude Petroleum as currently outlined in LPSC Tariff No. 75.2*. On Behalf of Energy XXI GOM, LLC. Issues: cost of service, rate design, and alternative regulation.

84. Expert Testimony. Docket No. 17-071-U. (2018). Before the Arkansas Public Service Commission*. In the Matter of the Application of Black Hills Energy Arkansas, Inc. for Approval of a General Change in Rates and Tariffs*. On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: cost of service, rate design, billing determinates.

85. Expert Testimony. Docket No. 17-010-FR. (2018). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filing of CenterPoint Energy Resources Corp. D/B/A CenterPoint Energy Arkansas Gas Pursuant to APSC Docket No. 15-098-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: cost of service, rate design, alternative regulation, formula rate plan.

86. Expert Testimony. Case No. PU-17-398. (2018). Before the North Dakota Public Service Commission. *In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in North Dakota*. On Behalf of the North Dakota Service Commission Advocacy Staff. Issues: cost of service, marginal cost of service, and rate design.

87. Expert Testimony. Docket No. 20170179-GU. (2018). Before the Florida Public Service Commission. *In re: Petition for rate increase and approval of depreciation study by Florida City Gas.* On Behalf of the Citizens of the State of Florida. Issues: policy issues concerning long-term gas capacity procurement.

88. Expert Testimony. Docket No. 18-KCPE-095-MER. (2018). Before the Kansas Corporation Commission. *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 Merger of Westar, Inc. and Great Plains Energy Incorporated.* On the Behalf of the Kansas Electric Power Cooperative, Inc. Issues: merger/acquisition policy, financial risk,

and ring-fencing.

89. Expert Testimony. Docket No. GR17070776. (2018). Before the New Jersey Board of Public Utilities. In the Matter of the Petition of Public Service Electric and Gas Company for Approval of the Next Phase of the Gas System Modernization Program and Associated Cost Recovery Mechanism ("GSMP II"). On behalf of the Division of Rate Counsel. Issues: economic impact, infrastructure replacement program rider, pipeline replacement, leak rate comparisons and cost benefit analysis.

90. Expert Affidavit. Case No. 18-489. (2018). Before the Civil District Court for the Parish of Orleans, State of Louisiana. *Bayou Bridge Pipeline, LLC versus The White Castle Lumber and Shingle Company Limited and Jeanerette Lumber & Shingle CO. L.L.C.* Issues: economic impact of crude oil pipeline development.

91. Expert Testimony. Docket No. 16-036-FR. (2017). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U*. On behalf of the Office of the Arkansas Attorney General Leslie Rutledge. Issue: cost of service, rate design, alternative regulation, formula rate plan.

92. Expert Testimony. Docket No. 2017-AD-0112. (2017). Before the Mississippi Public Service Commission. *In re: Encouraging Stipulation of Matters in Connection with the Kemper County IGCC Project*. On Behalf of the Mississippi Public Utilities Staff. Issues: financial analysis, rates and cost trends, economic impacts of proposal.

93. Expert Testimony. Case No. 2017-00179. (2017). Before the Public Service Commission, Commonwealth of Kentucky. *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 a Regulatory Asset or Liability Related to the Big Sandy 1 Operation Rider; and (5) An Order Granting All Other Required Approvals and Relief.* On Behalf of the Office of the Kentucky Attorney General. Issues: rate design, revenue allocation, economic development.

94. Expert Testimony. Docket No. 17-010-FR. (2017). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filing of CenterPoint Energy Resources Corp. D/B/A CenterPoint Energy Arkansas Gas Pursuant to APSC Docket No. 15-098-U.* On Behalf of the Arkansas Attorney General Leslie Rutledge. Issues: cost of service, rate design, alternative regulation, formula rate plan.

95. Expert Testimony. Formal Case No. 1142. (2017). Before the Public Service Commission of the District of Columbia. *In the Matter of the Merger of AltaGas Ltd. and WGL Holdings, Inc.* On Behalf of the Office of the People's Counsel. Issues: merger/acquisition policy, financial risk, ring-fencing, and reliability.

96. Expert Testimony. D.P.U. 17-05. (2017). Before the Massachusetts Department of Public Utilities. *Petition of NSTAR Electric Company and Western Massachusetts Electric Company each d/b/a Eversource Energy for Approval of an Increase in Base Distribution Rates for Electric Service Pursuant to G.L. c. 164, § 94 and 220 C.M.R. § 5.00*. On Behalf of the Massachusetts Office of the Attorney General Office of Ratepayer Advocacy. Issues: performance-based ratemaking, multi-factor productivity estimation.

97. Deposition and Testimony. (2017) Before the Nebraska Section 70, Article 13 Arbitration

Panel. *Northeast Nebraska Public Power District, City of South Sioux City Nebraska; City of Wayne, Nebraska; City of Valentine, Nebraska; City of Beatrice, Nebraska; City of Scribner, Nebraska; Village of Walthill, Nebraska, vs. Nebraska Public Power District.* On the Behalf of Baird Holm LLP for the Plaintiffs. Issues: rate discounts; cost of service; utility regulation, economic harm.

98. Expert Testimony. Docket No. 16-052-U. (2017). Before the Arkansas Public Service Commission. *In the Matter of the Application of the Oklahoma Gas and Electric Company for Approval of a General Change in Rates, Charges and Tariffs.* On the Behalf of the Office of Arkansas Attorney General Leslie Rutledge. Issues: cost of service, rate design, alternative regulation, formula rate plan.

99. Expert Testimony. Docket No. 16-KCPE-593-ACQ. (2016). Before the Kansas Corporation Commission. *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, Inc. by Great Plains Energy Incorporated.* On the Behalf of the Kansas Electric Power Cooperative, Inc. Issues: merger/acquisition policy, financial risk, and ring-fencing.

100. Expert Testimony. Formal Case No. 1139. (2016). Before the Public Service Commission of the District of Columbia. *In the Matter of the Application of Potomac Electric Power Company for Authority to Increase Existing Retail Rates and Charges for Electric Distribution Service.* On the Behalf of the Office of the People's Counsel for the District of Columbia. Issues: cost of service, rate design, alternative regulation.

101. Expert Affidavit. Docket No. CP15-558-000 (2016). Before the United States of America Federal Energy Regulatory Commission. *PennEast Pipeline Company, LLC*. Affidavit and Reply Affidavit. On the Behalf of the New Jersey Division of Rate Counsel. Issues: pipeline capacity, peak day requirements.

102. Expert Testimony. Docket No. RPU-2016-0002. (2016). Before the Iowa Utilities Board. *In re: Iowa American Water Company application for revision of rates.* On behalf of the Citizens of the State of Florida. Issue: revenue stabilization mechanism, revenue decoupling.

103. Expert Testimony. Docket No. 15-015-U. (2016). Before the Arkansas Public Service Commission. *In the Matter of the Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U*. On behalf of the Office of the Arkansas Attorney General Leslie Rutledge. Issue: formula rate plan evaluation.

104. Expert Testimony. Docket Nos. 160021-EI, 160061-EI, 160062-EI, and 160088-EI. (2016). Before the Florida Public Service Commission. *In re: Petition for rate increase by Florida Power & Light Company (consolidated).* On behalf of the Citizens of the State of Florida. Issue: load forecasting.

105. Expert Testimony. Docket Nos. 160021-EI, 160061-EI, 160062-EI, and 160088-EI. (2016). Before the Florida Public Service Commission. *In re: Petition for rate increase by Florida Power & Light Company (consolidated).* On behalf of the Citizens of the State of Florida. Issue: off-system sales incentives.

106. Expert Testimony. Project No. 5-103. (2016). United States of America Federal Energy Regulatory Commission. *Confederated Salish and Kootenai Tribes Energy Keepers, Incorporated*. On behalf of the Flathead, Mission, and Jocko Valley Irrigation Districts and

the Flathead Joint Board of Control of the Flathead, Mission, and Jocko Valley Irrigation Districts.

107. Expert Testimony. Docket No. 15-098-U. (2016). Before the Arkansas Public Service Commission. *In the Matter of the Application of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Arkansas Gas for a General Change or Modification in its Rates, Charges and Tariffs.* On behalf of the Office of the Arkansas Attorney General. Issues: formula rate plan, cost of service and rate design.

108. Expert Testimony. BPU Docket No. GM15101196. (2016). *In the Matter of the Merger of Southern Company and AGL Resources, Inc*. On behalf of the New Jersey Division of Rate Counsel. Issues: merger standards of review, customer dividend contributions, synergy savings and costs to achieve, ratemaking treatment of merger-related costs.

109. Expert Testimony. Docket No. 15-078-U. (2015). Before the Arkansas Public Service Commission. *In the Matter of the Joint Application of SourceGas Inc., SourceGas LLC, SourceGas Holdings LLC and Black Hills Utility Holdings, Inc. for all Necessary Authorizations and Approvals for Black Hills Utility Holdings, Inc. to Acquire SourceGas Holdings LLC.* On behalf of the Office of the Arkansas Attorney General. Issues: public policy and regulatory policy associated with the acquisition.

110. Expert Testimony. Docket No. 15-031-U. (2015). Before the Arkansas Public Service Commission. *In the Matter of the Application of SourceGas Arkansas Inc. for an Order Approving the Acquisition of Certain Storage Facilities and the Recovery of Investments and Expenses Associated Therewith.* On behalf of the Office of the Arkansas Attorney General. Issues: cost-benefit analysis, transmission cost analysis, and a due diligence analysis.

111. Expert Testimony. Docket No. 15-015-U. (2015). Before the Arkansas Public Service Commission. *In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.* On behalf of the Office of the Arkansas Attorney General. Issues: economic development riders and production plant cost allocation.

112. Expert Testimony. Docket No. 7970. (2015). Before the Vermont Public Service Board. *Petition of Vermont Gas Systems, Inc., for a certificate of public good pursuant to 30 V.S.A.§ 248, authorizing the construction of the "Addison Natural Gas Project" consisting of approximately 43 miles of new natural gas transmission pipeline in Chittenden and Addison Counties, approximately 5 miles of new distribution mainlines in Addison County, together with three new gate stations in Williston, New Haven, and Middlebury, Vermont*. On behalf of AARP-Vermont. Issues: net economic benefits of proposed natural gas transmission project.

113. Expert Testimony. File No. ER-2014-0370 (2015). Before the Public Service Commission of the State of Missouri. *In the Matter of Kansas City Power & Light Company for Authority Implement A General Rate Increase for Electric Service*. On behalf of the Missouri Office of the People's Counsel. Issues: customer charges, rate design, revenue distribution, class cost of service, and policy and ratemaking considerations in connection with electric vehicle charging stations.

114. Expert Testimony. File No. ER-2014-0351 (2015). Before the Public Service Commission of the State of Missouri. *In the Matter of The Empire District Electric Company for Authority*

To File Tariffs Increasing Rates for Electric Service Provided to Customers In the Company's Missouri Service Area. On behalf of the Missouri Office of the People's Counsel. Issues: customer charges, rate design, revenue distribution, and class cost of service.

115. Expert Testimony. D.P.U. 14-130 (2015). Before the Massachusetts Department of Public Utilities. *Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval by the Department of Public Utilities of the Company's 2015 Gas System Enhancement Program Plan, pursuant to G.L. c. 164, § 145, and for rates effective May 1, 2015.* On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

116. Expert Testimony. D.P.U. 14-131 (2015). Before the Massachusetts Department of Public Utilities. *Petition of The Berkshire Gas Company for approval by the Department of Public Utilities of the Company's Gas System Enhancement Program Plan for 2015, pursuant to G.L. c. 164, § 145, and for rates effective May 1, 2015*. On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

117. Expert Testimony. D.P.U. 14-132 (2015). Before the Massachusetts Department of Public Utilities. *Petition of Boston Gas Company and Colonial Gas Company d/b/a National Grid for approval by the Department of Public Utilities of the Companies' Gas System Enhancement Program for 2015, pursuant to G.L. c. 164, § 145, and for rates effective May 1, 2015*. On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

118. Expert Testimony. D.P.U. 14-133 (2015). Before the Massachusetts Department of Public Utilities. *Petition of Liberty Utilities for approval by the Department of Public Utilities of the Company's Gas System Enhancement Program Plan for 2015, pursuant to G.L. c. 164, § 145, and for rates effective May 1, 2015*. On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

119. Expert Testimony. D.P.U. 14-134 (2015). Before the Massachusetts Department of Public Utilities. *Petition of Bay State Gas Company d/b/a Columbia Gas of Massachusetts for approval by the Department of Public Utilities of the Company's Gas System Enhancement Program Plan for 2015, pursuant to G.L. c. 164, § 145, and for rates to be effective May 1, 2015*. On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

120. Expert Testimony. D.P.U. 14-135 (2015). Before the Massachusetts Department of Public Utilities. *Petition of NSTAR Gas Company for approval by the Department of Public Utilities of the Company's Gas System Enhancement Program Plan for 2015, pursuant to G.L. c. 164, § 145, and for rates to be effective May 1, 2015*. On behalf of the Attorney General's Office. Issues: ratepayer protections, cost allocations, rate design, performance metrics.

121. Expert Report. Docket No. X-33192 (2015). Before the Louisiana Public Service Commission. *Examination of the Comprehensive Costs and Benefits of Net Metering in Louisiana.* On behalf of the Louisiana Public Service Commission. Issues: cost-benefit, cost of service, rate impact.

122. Expert Testimony. F.C. 1119 (2014). Before the District of Columbia Public Service Commission. *In the Matter of the Merger of Exelon Corporation, Pepco Holdings, Inc.,*

Potomac Electric Power Company, Exelon Energy Delivery Company, LLC, and new Special Purpose Entity, LLC. On behalf of the Office of the People's Counsel. Issues: economic impact analysis, reliability, consumer investment fund, regulatory oversight, impacts to competitive electricity markets.

123. Expert Report. Civil Action 1:08-cv-0046 (2014). Before the U.S. District Court for the Southern District of Ohio. *Anthony Williams, et al., v. Duke Energy International, Inc., et al.* On behalf of Markovits, Stock & DeMarco, Attorneys & Counselors at Law. Issues: public utility regulation, electric power markets, economic harm.

124. Expert Testimony. D.P.U. 14-64 (2014). Before the Massachusetts Department of Public Utilities. *NSTAR Gas Company/HOPCO Gas Services Agreement. On behalf of the Office of the Public Advocate*. Issues: certain ratemaking features associated with the proposed Gas Service Agreement.

125. Expert Testimony. Docket Nos. 14-0224 and 14-0225 (2014). Before the Illinois Commerce Commission. *In the Matter of the Peoples Gas Light and Coke Company and North Shore Gas Company Proposed General Increase in Rates for Gas Service (consolidated)*. On behalf of the People of the State of Illinois. Issues: test year expenses, cost benchmarking analysis, pipeline replacement, and leak rate comparisons.

126. Expert Testimony. Docket 8191 (2014). Before the Vermont Public Service Board. *In Re: Petition of Green Mountain Power Corporation for Approval of a Successor Alternative Regulation Plan.* On the behalf of AARP-Vermont. Issues: Alternative Regulation.

127. Expert Testimony. Docket No. 2013-00168 (2014). Before the Maine Public Utilities Commission. *In the Matter of the Request for Approval of an Alternative Rate Plan (ARP 2014) Pertaining to Central Maine Power Company*. On behalf of the Office of the Public Advocate. Issues: class cost of service study, marginal cost of service study, revenue distribution and rate design.

128. Expert Testimony. D.P.U. 13-90 (2013). Before the Massachusetts Department of Public Utilities. *Petition of Fitchburg Gas and Electric Light Company (Electric Division) d/b/a Unitil to the Department of Public Utilities for approval of the rates and charges and increase in base distribution rates for electric service.* On behalf of the Office of the Ratepayer Advocate. Issues: capital cost adjustment mechanism and performance-based regulation.

129. Expert Testimony. BPU Docket Nos. EO13020155 and GO13020156. (2013). Before the State of New Jersey Board of Public Utilities. *I/M/O The Petition of Public Service Electric & Gas Company for the Approval of the Energy Strong Program.* On behalf of the Division of Rate Counsel. Issues: economic impact, infrastructure replacement program rider, pipeline replacement, leak rate comparisons and cost benefit analysis.

130. Expert Testimony. D.P.U. 13-75 (2013). Before the Massachusetts Department of Public Utilities. *Investigation by the Department of Public Utilities on its Own Motion as to the Propriety of the Rates and Charges by Bay State Gas Company d/b/a Columbia Gas of Massachusetts set forth in Tariffs M.D.P.U. Nos. 140 through 173, and Approval of an Increase in Base Distribution Rates for Gas Service Pursuant to G.L. c. 164, § 94 and 220 C.M.R. § 5.00 et seq., filed with the Department on April 16, 2013, to be effective May 1, 2013*. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Target infrastructure replacement program rider, pipeline replacement, and leak

rate comparisons; environmental benefits analysis; O&M offset; and cost benchmarking analysis.

131. Expert Testimony. Docket No. 13-115 (2013). Before the Delaware Public Service Commission. *In the Matter of the Application of Delmarva Power & Light Company FOR an Increase in Electric Base Rates and Miscellaneous Tariff Changes* (Filed March 22, 2013). On the Behalf of Division of the Public Advocate. Issues: pro forma infrastructure proposal, class cost of service study, revenue distribution, and rate design.

132. Expert Testimony. Formal Case No. 1103 (2013). Before the Public Service Commission of the District of Columbia. *In the Matter of the Application of the Potomac Electric Power Company for Authority to Increase Existing Retail Rates and Charges for Electric Distribution Service*. On the Behalf of the Office of the People's Counsel of the District of Columbia. Issues: Pro forma adjustment for reliability investments.

133. Expert Testimony. Case No. 9326 (2013). Before the Public Service Commission of Maryland. *In the Matter of the Application of Baltimore Gas and Electric Company for Adjustments to its Electric and Gas Base Rates*. On the Behalf of the Maryland Office of the People's Counsel. Issues: Electric Reliability Investment ("ERI") initiatives, pro forma gas infrastructure proposal, tracker mechanisms, class cost of service study, revenue distribution, and rate design

134. Rulemaking Testimony. (2013). Before the Louisiana Tax Commission. Examination of Louisiana Assessors' Association Well Diameter Analysis, economic development policies regarding midstream assets and industrial development.

135. Expert Testimony. Case No. 9317 (2013). Before the Public Service Commission of Maryland. *In the Matter of the Application of Delmarva Power & Light Company for Adjustments to its Retail Rates for the Distribution of Electric Energy*. Direct, and Surrebuttal. On the Behalf of the Maryland Office of the People's Counsel. Issues: Grid Resiliency Charge, tracker mechanisms, pipeline replacement, class cost of service study, revenue distribution, and rate design.

136. Expert Testimony. Case No. 9311 (2013). Before the Public Service Commission of Maryland. *In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates for the Distribution of Electric Energy*. Direct, and Surrebuttal. On the Behalf of the Maryland Office of the People's Counsel. Issues: Grid Resiliency Charge, tracker mechanisms, pipeline replacement, class cost of service study, revenue distribution, and rate design.

137. Expert Testimony. Docket No. 12AL-1268G (2013). Before the Public Utilities Commission of the State of Colorado. *In the Matter of the Tariff Sheets Filed by Public Service Company of Colorado with Advice No. 830 – Gas. Answer*. On the Behalf of the Colorado Office of Consumer Counsel. Issues: Pipeline System Integrity Adjustment, tracker mechanisms, pipeline replacement and leak rate comparisons.

138. Expert Testimony. BPU Docket No. EO12080721 (2013). Before the New Jersey Board of Public Utilities. *In the Matter of the Public Service Electric & Gas Company for Approval of an Extension of Solar Generation Program*. On the Behalf of the New Jersey Division of Rate Counsel. Direct, Rebuttal, Surrebuttal. Issues: solar energy market design, solar energy market conditions, solar energy program design and net economic benefits.

139. Expert Testimony. BPU Docket No. EO12080726 (2013). Before the New Jersey Board

of Public Utilities. *In the Matter of the Petition of Public Service Electric & Gas Company for Approval of a Solar Loan III Program.* On the Behalf of the New Jersey Division of Rate Counsel. Direct, Rebuttal and Surrebuttal. Issues: solar energy market design, solar energy market conditions, solar energy program design.

140. Expert Testimony. BPU Docket No. EO11050314V. (2012). Before the New Jersey Board of Public Utilities. *In the Matter of the Petition of Fishermen's Atlantic City Windfarm, LLC for the Approval of the State Waters Project and Authorizing Offshore Wind Renewable Energy Certificates*. On the Behalf of the New Jersey Division of Rate Counsel. December 17, 2012. Issues: approval of offshore wind project and ratepayer financial support for the proposed project.

141. Expert Testimony. D.P.U. 12-25. (2012). Before the Massachusetts Department of Public Utilities. *In the Matter of Bay State Gas Company d/b/a/ Columbia Gas Company of Massachusetts Request for Increase in Rates*. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Target infrastructure replacement program rider, pipeline replacement and leak rate comparisons.

142. Expert Testimony. Docket Nos. UE-120436, et.al. (consolidated). (2012). Before the Washington Utilities and Transportation Commission. *Washington Utilities and Transportation Commission v. Avista Corporation D/B/A Avista Utilities*. On the Behalf of the Washington Attorney General, Office of the Public Counsel. Issues: Revenue Decoupling, lost revenues, tracker mechanisms, attrition adjustments.

143. Expert Testimony. Case No. 9286. (2012) Before the Public Service Commission of Maryland. *In Re: Potomac Electric Power Company ("Pepco") General Rate Case*. On the Behalf of the Maryland Office of the People's Counsel. Issues: Capital tracker mechanisms/reliability investment mechanisms, reliability issues, regulatory lag, class cost of service, revenue distribution, rate design.

144. Expert Testimony. Case No 9285. (2012) Before the Public Service Commission of Maryland. *In Re: the Delmarva Power and Light Company General Rate Case*. On the Behalf of the Maryland Office of the People's Counsel. Issues: Capital tracker mechanisms/reliability investment mechanisms, reliability issues, regulatory lag, class cost of service, revenue distribution, rate design.

145. Expert Testimony. Docket Nos. UE-110876 and UG-110877 (consolidated). (2012). Before the Washington Utilities and Transportation Commission. *Washington Utilities and Transportation Commission v. Avista Corporation D/B/A Avista Utilities*. On the Behalf of the Washington Attorney General, Office of the Public Counsel. Issues: Revenue Decoupling, lost revenues, tracker mechanisms.

146. Expert Testimony. BPU Docket No. EO11050314V. (2012). Before the New Jersey Board of Public Utilities. *In the Matter of the Petition of Fishermen's Atlantic City Windfarm, LLC for the Approval of the State Waters Project and Authorizing Offshore Wind Renewable Energy Certificates*. On the Behalf of the New Jersey Division of Rate Counsel. February 3, 2012. Issues: approval of offshore wind project and ratepayer financial support for the proposed project.

147. Expert Testimony. Docket No. NG 0067. (2012). Before the Public Service Commission of Nebraska. *In the Matter of the Application of SourceGas Distribution, LLC Approval of a General Rate Increase*. On the Behalf of the Public Advocate. January 31, 2012.

Issues: Revenue Decoupling, Customer Adjustments, Weather Normalization Adjustments, Class Cost of Service Study, Rate Design.

148. Expert Testimony. Docket No. G-04204A-11-0158. (2011). Before the Arizona Corporation Commission. On the Behalf of the Arizona Corporation Commission Staff. *In the Matter of the Application of UNS Gas, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of Its Arizona Properties*. Issues: Revenue Decoupling; Class Cost of Service Modeling; Revenue Distribution; Rate Design.

149. Expert Testimony. Formal Case Number 1087. (2011). Before the Public Service Commission of the District of Columbia. On the Behalf of the Office of the People's Counsel of the District of Columbia. *In the Matter of the Application of Potomac Electric Power Company for Authority to Increase Existing Retail Rates and Charges for Electric Distribution Service*. Issues: Regulatory lag, ratemaking principles, reliability-related capital expenditure tracker proposals.

150. Expert Affidavit. Case No. 11-1364. (2011). *The State of Louisiana, the Louisiana Department of Environmental Quality, and the Louisiana Public Service Commission v. United States Environmental Protection Agency and Lisa P. Jackson.* Before the United States Court of Appeals for the District of Columbia Circuit. On the behalf of the State of Louisiana, the Louisiana Department of Environmental Quality, and the Louisiana Public Service Commission. Issues: Impacts of environmental costs on electric utilities, compliance requirements, investment cost of mitigation equipment, multi-area dispatch modeling and plant retirements.

151. Expert Affidavit. Docket No. EPA-HQ-OAR-2009-0491. (2011). Before the U.S. Environmental Protection Agency. *Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals*. On the Behalf of the Louisiana Public Service Commission. Issues: Impacts of environmental costs on electric utilities, compliance requirements, investment cost of mitigation equipment, multi-area dispatch modeling and plant retirements.

152. Expert Testimony. Case No. 9296. (2011). Before the Maryland Public Service Commission. *On the Behalf of the Maryland Office of People's Counsel. In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges and Revise its Terms and Conditions for Gas Service*. Issues: Infrastructure Cost Recovery Rider; Class Cost of Service Modeling; Revenue Distribution; Rate Design.

153. Expert Testimony. Docket No. G-01551A-10-0458. (2011). Before the Arizona Corporation Commission. On the Behalf of the Arizona Corporation Commission Staff. *In the Matter of the Application of Southwest Gas Corporation for the Establishment of Just and Reasonable Rates and Charges Designed to Realize A Reasonable Rate of Return on the Fair Value of its Properties throughout Arizona*. Issues: Revenue Decoupling; Class Cost of Service Modeling; Revenue Distribution; Rate Design.

154. Expert Testimony. Docket No. 11-0280 and 11-0281. (2011). Before the Illinois Commerce Commission. On the Behalf of the Illinois Attorney General, the Citizens Utility Board, and the City of Chicago, Illinois. *In re: Peoples Gas Light and Coke Company and North Shore Natural Gas Company*. Issues: Revenue Decoupling and Rate Design. (Direct and Rebuttal)

155. Expert Testimony. D.P.U. 11-01. (2011). Before the Massachusetts Department of Public Utilities. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. *Petition of the Fitchburg Electric and Gas Company (Electric Division) for Approval of A General Increase in Electric Distribution Rates and Approval of a Revenue Decoupling Mechanism*. Issues: Capital Cost Rider, Revenue Decoupling.

156. Expert Testimony. D.P.U. 11-02. (2011). Before the Massachusetts Department of Public Utilities. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. *Petition of the Fitchburg Electric and Gas Company (Gas Division) for Approval of A General Increase in Electric Distribution Rates and Approval of a Revenue Decoupling Mechanism*. Issues: Pipeline Replacement Rider, Revenue Decoupling.

157. Expert Affidavit. Docket No. EL-11-13 (2011). Before the Federal Energy Regulatory Commission. Petition for Preliminary Ruling, Atlantic Grid Operations. On the Behalf of the New Jersey Division of Rate Counsel. Issues: Offshore wind generation development, offshore wind transmission development, ratemaking treatment of development costs, transmission development incentives.

158. Expert Opinion. Case No. CI06-195. (2011). Before the District Court of Jefferson County, Nebraska. On the Behalf of the City of Fairbury, Nebraska and Michael Beachler. In re: Endicott Clay Products Co. vs. City of Fairbury, Nebraska and Michael Beachler. Issues: rate design and ratemaking, time of use and time differentiated rate structures, empirical analysis of demand and usage trends for tariff eligibility requirements.

159. Expert Testimony. D.P.U. 10-114. (2010). Before the Massachusetts Department of Public Utilities. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Petition of the New England Gas Company for Approval of A General Increase in Electric Distribution Rates and Approval of a Revenue Decoupling Mechanism. Issues: infrastructure replacement rider.

160. Expert Testimony. D.P.U. 10-70. (2010). Before the Massachusetts Department of Public Utilities. Petition of the Western Massachusetts Electric Company for Approval of A General Increase in Electric Distribution Rates and Approval of a Revenue Decoupling Mechanism. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Revenue decoupling; infrastructure replacement rider; performance-based regulation; inflation adjustment mechanisms; and rate design.

161. Expert Testimony. G.U.D. Nos. 998 & 9992. (2010). Before the Texas Railroad Commission. In the Matter of the Rate Case Petition of Texas Gas Services, Inc. On the Behalf of the City of El Paso, Texas. Issues: Cost of service, revenue distribution, rate design, and weather normalization.

162. Expert Testimony. B.P.U Docket No. GR10030225. (2010). Before the New Jersey Board of Public Utilities. In the Matter of the Petition of New Jersey Natural Gas Company for Approval of Regional Greenhouse Gas Initiative Programs and Associated Cost Recovery Mechanisms Pursuant to N.J.S.A. 48:3-98.1. On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues: solar energy proposals, solar securitization issues, solar energy policy issues.

163. Expert Testimony. D.P.U. 10-55. (2010). Before the Massachusetts Department of Public Utilities. Investigation Into the Propriety of Proposed Tariff Changes for Boston Gas Company, Essex Gas Company, and Colonial Gas Company. (d./b./a. National Grid). On

the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Revenue decoupling; pipeline-replacement rider; performance-based regulation; partial productivity factor estimates, inflation adjustment mechanisms; and rate design.

164. Expert Testimony. Cause No.43839. (2010). Before the Indiana Utility Regulatory Commission. In the Matter of Southern Indiana Gas and Electric Company d/b/a/ Vectren Energy Delivery of Indiana, Inc. (Vectren South-Electric). On the behalf of the Indiana Office of Utility Consumer Counselor (OUCC). Issues: revenue decoupling, variable production cost riders, gains on off-system sales, transmission cost riders.

165. Congressional Testimony. Before the United States Congress. (2010). U.S. House of Representatives, Committee on Natural Resources. Hearing on the Consolidated Land, Energy, and Aquatic Resources Act. June 30, 2010.

166. Expert Testimony. Before the City Counsel of El Paso, Texas; Public Utility Regulatory Board. (2010). On the Behalf of the City of El Paso. In Re: Rate Application of Texas Gas Services, Inc. Issues: class cost of service study (minimum system and zero intercept analysis), rate design proposals, weather normalization adjustment, and its cost of service adjustment clause, conservation adjustment clause proposals, and other cost tracker policy issues.

167. Expert Testimony. Docket 09-00183. (2010). Before the Tennessee Regulatory Authority. In the Matter of the Petition of Chattanooga Gas Company for a General Rate Increase, Implementation of the EnergySMART Conservation Programs, and Implementation of a Revenue Decoupling Mechanism. On the Behalf of Tennessee Attorney General, Consumer Advocate & Protection Division. Issues: revenue decoupling and energy efficiency program review and cost effectiveness analysis.

168. Expert Testimony and Exhibits. Docket No. 10-240. (2010). Before the Louisiana Office of Conservation. In Re: Cadeville Gas Storage, LLC. On the Behalf of Cardinal Gas Storage, LLC. Issues: alternative uses and relative economic benefits of conversion of depleted hydrocarbon reservoir for natural gas storage purposes.

169. Expert Testimony. Docket No. 09505-EI. (2010). Before the Florida Public Service Commission. In Re: Review of Replacement Fuel Costs Associated with the February 26, 2008 outage on Florida Power & Light's Electrical System. On the Behalf of the Florida Office of Public Counsel for the Citizens of the State of Florida. Issues: Replacement costs for power outage, regulatory policy/generation development incentives, renewable and energy efficiency incentives.

170. Expert Report, Recommendation, and Proposed Rule: Docket Number R-29380-A, ex parte, (2009). Before the Louisiana Public Service Commission. In re: Environmental Adjustment Clause and Environmental Certification for Electric Power Generation Resources. On the behalf of the Louisiana Public Service Commission Staff. Report and Recommendation. Issues: environmental regulation and cost recovery; allowance allocations and air credit markets cost recovery treatment; other generation planning issues.

171. Expert Testimony. Docket 09-00104. (2009). Before the Tennessee Regulatory Authority. In the Matter of the Petition of Piedmont Natural Gas Company, Inc. to Implement a Margin Decoupling Tracker Rider and Related Energy Efficiency and Conservation Programs. On the Behalf of the Tennessee Attorney General, Consumer Advocate & Protection Division.

Issues: revenue decoupling, energy efficiency program review, weather normalization.

172. Expert Testimony. Docket Number NG-0060. (2009). Before the Nebraska Public Service Commission. In the Matter of SourceGas Distribution, LLC Approval for a General Rate Increase. On the Behalf of the Nebraska Public Advocate. October 29, 2009. Issues: revenue decoupling, inflation trackers, infrastructure replacement riders, customer adjustment rider, weather normalization rider, weather normalization adjustments, estimation of normal weather for ratemaking purposes.

173. Expert Report and Deposition. Before the 23rd Judicial District Court, Parish of Assumption, State of Louisiana. On the Behalf of Dow Hydrocarbons and Resources, Inc. September 1, 2009. (Deposition, November 23-24, 2009). Issues: replacement and repair costs for underground salt cavern hydrocarbon storage.

174. Expert Testimony. D.P.U. 09-39. Before the Massachusetts Department of Public Utilities. (2009). Investigation Into the Propriety of Proposed Tariff Changes for Massachusetts Electric Company and Nantucket Electric Company (d./b./a. National Grid). On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Revenue decoupling; infrastructure rider; performance-based regulation; inflation adjustment mechanisms; revenue distribution; and rate design.

175. Expert Testimony. D.P.U. 09-30. Before the Massachusetts Department of Public Utilities. (2009). In the Matter of Bay State Gas Company Request for Increase in Rates. On the Behalf of the Office of the Attorney General, Office of Ratepayer Advocacy. Issues: Revenue decoupling; target infrastructure replacement program rider; revenue distribution; and rate design.

176. Expert Testimony. Docket EO09030249. (2009). Before the New Jersey Board of Public Utilities. In the Matter of the Petition of Public Service Electric and Gas Company for Approval of a Solar Loan II Program and An Associated Cost Recovery Mechanism. On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues: solar energy market design, renewable portfolio standards, solar energy, and renewable financing/loan program design.

177. Expert Testimony. Docket EO0920097. (2009). Before the New Jersey Board of Public Utilities. In the Matter of the Verified Petition of Rockland Electric Company for Approval of an SREC-Based Financing Program and An Associated Cost Recovery Mechanism. On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues: solar energy market design; renewable energy portfolio standards; solar energy.

178. Expert Rebuttal Report. Civil Action No.: 2:07-CV-2165. (2009). Before the U.S. District Court, Western Division of Louisiana, Lake Charles Division. Prepared on the Behalf of the Transcontinental Pipeline Corporation. Issues: expropriation and industrial use of property.

179. Expert Testimony. Docket EO06100744. (2008). Before the New Jersey Board of Public Utilities. In the Matter of the Renewable Portfolio Standard – Amendments to the Minimum filing Requirements for Energy Efficiency, Renewable Energy, and Conservation Programs and For Electric Distribution Company Submittals of Filings in connection with Solar Financing (Atlantic City Electric Company). On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues: Solar energy market design; renewable energy portfolio standards; solar energy. (Rebuttal and Surrebuttal)

180. Expert Testimony. Docket EO08090840. (2008). Before the New Jersey Board of Public Utilities. In the Matter of the Renewable Portfolio Standard – Amendments to the Minimum filing Requirements for Energy Efficiency, Renewable Energy, and Conservation Programs and For Electric Distribution Company Submittals of Filings in connection with Solar Financing (Jersey Central Power & Light Company). On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues: Solar energy market design; renewable energy portfolio standards; solar energy. (Rebuttal and Surrebuttal)

181. Expert Testimony. Docket UG-080546. (2008). Before the Washington Utilities and Transportation Commission. On the Behalf of the Washington Attorney General (Public Counsel Section). Issues: Rate Design, Cost of Service, Revenue Decoupling, Weather Normalization.

182. Congressional Testimony. (2008). Senate Republican Conference: Panel on Offshore Drilling in the Restricted Areas of the Outer Continental Shelf. September 18, 2008.

183. Expert Testimony. Appeal Number 2007-125 and 2007-299. (2008). Before the Louisiana Tax Commission. On the Behalf of Jefferson Island Storage and Hub, LLC (AGL Resources). Issues: Valuation Methodologies, Underground Storage Valuation, LTC Guidelines and Policies, Public Purpose of Natural Gas Storage. July 15, 2008 and August 20, 2008.

184. Expert Testimony. Docket Number 07-057-13. (2008). Before the Utah Public Service Commission. In the Matter of the Application of Questar Gas Company to File a General Rate Case. On the Behalf of the Utah Committee of Consumer Services. Issues: Cost of Service, Rate Design. August 18, 2008 (Direct, Rebuttal, Surrebuttal).

185. Rulemaking Testimony. (2008). Before the Louisiana Tax Commission. Examination of Replacement Cost Tables, Depreciation and Useful Lives for Oil and Gas Properties. Chapter 9 (Oil and Gas Properties) Section. August 5, 2008.

186. Legislative Testimony. (2008). Examination of Proposal to Change Offshore Natural Gas Severance Taxes (HB 326 and Amendments). Joint Finance and Appropriations Committee of the Alabama Legislature. March 13, 2008.

187. Public Testimony. (2007). Issues in Environmental Regulation. Testimony before Gubernatorial Transition Committee on Environmental Regulation (Governor-Elect Bobby Jindal). December 17, 2007.

188. Public Testimony. (2007). Trends and Issues in Alternative Energy: Opportunities for Louisiana. Testimony before Gubernatorial Transition Committee on Natural Resources (Governor-Elect Bobby Jindal). December 13, 2007.

189. Expert Report and Recommendation: Docket Number S-30336 (2007). Before the Louisiana Public Service Commission. In re: Entergy Gulf States, Inc. Application for Approval of Advanced Metering Pilot Program. Issues: pilot program for demand response programs and advanced metering systems.

190. Expert Testimony. Docket EO07040278 (2007). Before the New Jersey Board of Public Utilities. In the Matter of the Petition of Public Service Electric & Gas Company for Approval of a Solar Energy Program and An Associated Cost Recovery Mechanism. On the Behalf of the Department of the Public Advocate, Division of Rate Counsel. Issues:

renewable energy market development, solar energy development, SREC markets, rate impact analysis, cost recovery issues.

191. Expert Testimony: Docket Number 05-057-T01 (2007). Before the Utah Public Service Commission. In the Matter of: Joint Application of Questar Gas Company, the Division of Public Utilities, and Utah Clean Energy for Approval of the Conservation Enabling Tariff Adjustment Options and Accounting Orders. On the behalf of the Utah Committee of Consumer Services. Issues: Revenue Decoupling, Demand-side Management; Energy Efficiency policies. (Direct, Rebuttal, and Surrebuttal Testimony)

192. Expert Testimony (Non-sworn rulemaking testimony) Docket Number RR-2008, (2007). Before the Louisiana Tax Commission. In re: Commission Consideration of Amendment and/or Adoption of Tax Commission Real/Personal Property Rules and Regulations. Issues: Louisiana oil and natural gas production trends, appropriate cost measures for wells and subsurface property, economic lives and production decline curve trends.

193. Expert Report, Recommendation, and Proposed Rule: Docket Number R-29213 & 29213-A, ex parte, (2007). Before the Louisiana Public Service Commission. In re: In re: Investigation to determine if it is appropriate for LPSC jurisdictional electric utilities to provide and install time-based meters and communication devices for each of their customers which enable such customers to participate in time-based pricing rate schedules and other demand response programs. On the behalf of the Louisiana Public Service Commission Staff. Report and Recommendation. Issues: demand response programs, advanced meter systems, cost recovery issues, energy efficiency issues, regulatory issues.

194. Expert Report, Recommendation, and Proposed Rule: Docket Number R-29712, ex parte, (2007) Before the Louisiana Public Service Commission. In re: Investigation into the ratemaking and generation planning implications of nuclear construction in Louisiana. On the behalf of the Louisiana Public Service Commission Staff. Report and Recommendation. Issues: nuclear cost power plant development, generation planning issues, and cost recovery issues.

195. Expert Testimony, Case Number U-14893, (2006). Before the Michigan Public Service Commission. In the Matter of SEMCO Energy Gas Company for Authority to Redesign and Increase Its Rates for the Sale and Transportation of Natural Gas In its MPSC Division and for Other Relief. On the behalf of the Michigan Attorney General. Issues: Rate Design, revenue decoupling, financial analysis, demand-side management program and energy efficiency policy. (Direct and Rebuttal Testimony).

196. Expert Report, Recommendation, and Proposed Rule: Docket Number R-29380, ex parte, (2006). Before the Louisiana Public Service Commission. In re: An Investigation Into the Ratemaking and Generation Planning Implications of the U.S. EPA Clean Air Interstate Rule. On the behalf of the Louisiana Public Service Commission Staff. Report and Recommendation. Issues: environmental regulation and cost recovery; allowance allocations and air credit markets; ratepayer impacts of new environmental regulations.

197. Expert Affidavit Before the Louisiana Tax Commission (2006). On behalf of ANR Pipeline, Tennessee Gas Transmission and Southern Natural Gas Company. Issues: Competitive nature of interstate and intrastate transportation services.

198. Expert Affidavit Before the 19th Judicial District Court (2006). Suit Number 491, 453

Section 26. On behalf of Transcontinental Pipeline Corporation, et.al. Issues: Competitive nature of interstate and intrastate transportation services.

199. Expert Testimony: Docket Number 05-057-T01 (2006). Before the Utah Public Service Commission. In the Matter of: Joint Application of Questar Gas Company, the Division of Public Utilities, and Utah Clean Energy for Approval of the Conservation Enabling Tariff Adjustment Options and Accounting Orders. On the behalf of the Utah Committee of Consumer Services. Issues: Revenue Decoupling, Demand-side Management; Energy Efficiency policies. (Rebuttal and Supplemental Rebuttal Testimony)

200. Legislative Testimony (2006). Senate Committee on Natural Resources. Senate Bill 655 Regarding Remediation of Oil and Gas Sites, Legacy Lawsuits, and the Deterioration of State Drilling.

201. Expert Report: Rulemaking Docket (2005). Before the New Jersey Bureau of Public Utilities. In re: Proposed Rulemaking Changes Associated with New Jersey's Renewable Portfolio Standard. Expert Report. The Economic Impacts of New Jersey's Proposed Renewable Portfolio Standard. On behalf of the New Jersey Office of Ratepayer Advocate. Issues: Renewable Portfolio Standards, rate impacts, economic impacts, technology cost forecasts.

202. Expert Testimony: Docket Number 2005-191-E. (2005). Before the South Carolina Public Service Commission. On behalf of NewSouth Energy LLC. In re: General Investigation Examining the Development of RFP Rules for Electric Utilities. Issues: Competitive bidding; merchant development. (Direct and Rebuttal Testimony).

203. Expert Testimony: Docket No. 05-UA-323. (2005). Before the Mississippi Public Service Commission. On the behalf of Calpine Corporation. In re: Entergy Mississippi's Proposed Acquisition of the Attala Generation Facility. Issues: Asset acquisition; merchant power development; competitive bidding.

204. Expert Testimony: Docket Number 050045-EI and 050188-EI. (2005). Before the Florida Public Service Commission. On the behalf of the Citizens of the State of Florida. In re: Petition for Rate Increase by Florida Power & Light Company. Issues: Load forecasting; O&M forecasting and benchmarking; incentive returns/regulation.

205. Expert Testimony (non-sworn, rulemaking): Comments on Decreased Drilling Activities in Louisiana and the Role of Incentives. (2005). Louisiana Mineral Board Monthly Docket and Lease Sale. July 13, 2005

206. Legislative Testimony (2005). Background and Impact of LNG Facilities on Louisiana. Joint Meeting of Senate and House Natural Resources Committee. Louisiana Legislature. May 19, 2005.

207. Public Testimony. Docket No. U-21453. (2005). Technical Conference before the Louisiana Public Service Commission on an Investigation for a Limited Industrial Retail Choice Plan.

208. Expert Testimony: Docket No. 2003-K-1876. (2005). On Behalf of Columbia Gas Transmission. Expert Testimony on the Competitive Market Structure for Gas Transportation Service in Ohio. Before the Ohio Board of Tax Appeals.

209. Expert Report and Testimony: Docket No. 99-4490-J, *Lafayette City-Parish Consolidated Government, et. al. v. Entergy Gulf States Utilities, Inc. et. al*. (2005, 2006). On behalf of

the City of Lafayette, Louisiana and the Lafayette Utilities Services. Expert Rebuttal Report of the Harborfront Consulting Group Valuation Analysis of the LUS Expropriation. Filed before 15th Judicial District Court, Lafayette, Louisiana.

210. Expert Testimony: ANR Pipeline Company v. Louisiana Tax Commission (2005), Number 468,417 Section 22, 19th Judicial District Court, Parish of East Baton Rouge, State of Louisiana Consolidated with Docket Numbers: 480,159; 489,776;480,160; 480,161; 480,162; 480,163; 480,373; 489,776; 489,777; 489,778;489,779; 489,780; 489,803; 491,530; 491,744; 491,745; 491,746; 491,912;503,466; 503,468; 503,469; 503,470; 515,414; 515,415; and 515,416. In re: Market structure issues and competitive implications of tax differentials and valuation methods in natural gas transportation markets for interstate and intrastate pipelines.

211. Expert Report and Recommendation: Docket No. U-27159. (2004). On Behalf of the Louisiana Public Service Commission Staff. Expert Report on Overcharges Assessed by Network Operator Services, Inc. Before the Louisiana Public Service Commission.

212. Expert Testimony: Docket Number 2004-178-E. (2004). Before the South Carolina Public Service Commission. On behalf of Columbia Energy LLC. In re: Rate Increase Request of South Carolina Electric and Gas. (Direct and Surrebuttal Testimony)

213. Expert Testimony: Docket Number 040001-EI. (2004). Before the Florida Public Service Commission. On behalf of Power Manufacturing Systems LLC, Thomas K. Churbuck, and the Florida Industrial Power Users Group. In re: Fuel Adjustment Proceedings; Request for Approval of New Purchase Power Agreements. Company examined: Florida Power & Light Company.

214. Expert Affidavit: Docket Number 27363. (2004). Before the Public Utilities Commission of Texas. Joint Affidavit on Behalf of the Cities of Texas and the Staff of the Public Utilities Commission of Texas Regarding Certified Issues. In Re: Application of Valor Telecommunications, L.P. For Authority to Establish Extended Local Calling Service (ELCS) Surcharges For Recovery of ELCS Surcharge.

215. Expert Report and Testimony. Docket 1997-4665-PV, 1998-4206-PV, 1999-7380-PV, 2000-5958-PV, 2001-6039-PV, 2002-64680-PV, 2003-6231-PV. (2003) Before the Kansas Board of Tax Appeals. (2003). In the Matter of the Appeals of CIG Field Services Company from orders of the Division of Property Valuation. On the Behalf of CIG Field Services. Issues: the competitive nature of natural gas gathering in Kansas.

216. Expert Report and Testimony: Docket Number U-22407. Before the Louisiana Public Service Commission (2002). On the Behalf of the Louisiana Public Service Commission Staff. Company examined: Louisiana Gas Services, Inc. Issues: Purchased Gas Acquisition audit, fuel procurement and planning practices.

217. Expert Testimony: Docket Number 000824-EI. Before the Florida Public Service Commission. (2002). On the Behalf of the Citizens of the State of Florida. Company examined: Florida Power Corporation. Issues: Load Forecasts and Billing Determinants for the Projected Test Year.

218. Public Testimony: Louisiana Board of Commerce and Industry (2001). Testimony on the Economic Impacts of Merchant Power Generation.

219. Expert Testimony: Docket Number 24468. (2001). On the Behalf of the Texas Office of

Public Utility Counsel. Public Utility Commission of Texas Staff's Petition to Determine Readiness for Retail Competition in the Portion of Texas Within the Southwest Power Pool. Company examined: AEP-SWEPCO.

220. Expert Report. (2001) On Behalf of David Liou and Pacific Richland Products, Inc. to Review Cogeneration Issues Associated with Dupont Dow Elastomers, L.L.C. (DDE) and the Dow Chemical Company (Dow).

221. Expert Testimony: Docket Number 01-1049, Docket Number 01-3001. (2001) On behalf the Nevada Office of Attorney General, Bureau of Consumer Protection. Petition of Central Telephone Company-Nevada D/b/a Sprint of Nevada and Sprint Communications L.P. for Review and Approval of Proposed Revised Performance Measures and Review and Approval of Performance Measurement Incentive Plans. Before the Public Utilities Commission of Nevada.

222. Expert Affidavit: Multiple Dockets (2001). Before the Louisiana Tax Commission. On the Behalf of Louisiana Interstate Pipeline Companies. Testimony on the Competitive Nature of Natural Gas Transportation Services in Louisiana.

223. Expert Affidavit before the Federal District Court, Middle District of Louisiana (2001). Issues: Competitive Nature of the Natural Gas Transportation Market in Louisiana. On behalf of a Consortium of Interstate Natural Gas Transportation Companies.

224. Public Testimony: Louisiana Board of Commerce and Industry (2001). Testimony on the Economic and Ratepayer Benefits of Merchant Power Generation and Issues Associated with Tax Incentives on Merchant Power Generation and Transmission.

225. Expert Testimony: Docket Number 01-1048 (2001). Before the Public Utilities Commission of Nevada. On the Behalf of the Nevada Office of the Attorney General, Bureau of Consumer Protection. Company analyzed: Nevada Bell Telephone Company. Issues: Statistical Issues Associated with Performance Incentive Plans.

226. Expert Testimony: Docket 22351 (2001). Before the Public Utility Commission of Texas. On the Behalf of the City of Amarillo. Company analyzed: Southwestern Public Service Company. Issues: Unbundled cost of service, affiliate transactions, load forecasting.

227. Expert Testimony: Docket 991779-EI (2000). Before the Florida Public Service Commission. On the Behalf of the Citizens of the State of Florida. Companies analyzed: Florida Power & Light Company; Florida Power Corporation; Tampa Electric Company; and Gulf Power Company. Issues: Competitive Nature of Wholesale Markets, Regional Power Markets, and Regulatory Treatment of Incentive Returns on Gains from Economic Energy Sales.

228. Expert Testimony: Docket 990001-EI (1999). Before the Florida Public Service Commission. On the Behalf of the Citizens of the State of Florida. Companies analyzed: Florida Power & Light Company; Florida Power Corporation; Tampa Electric Company; and Gulf Power Company. Issues: Regulatory Treatment of Incentive Returns on Gains from Economic Energy Sales.

229. Expert Testimony: Docket 950495-WS (1996). Before the Florida Public Service Commission. On the Behalf of the Citizens of the State of Florida. Company analyzed: Southern States Utilities, Inc. Issues: Revenue Repression Adjustment, Residential and Commercial Demand for Water Service.

230. Legislative Testimony. Louisiana House of Representatives, Special Subcommittee on Utility Deregulation. (1997). On Behalf of the Louisiana Public Service Commission Staff. Issue: Electric Restructuring.

231. Expert Testimony: Docket 940448-EG -- 940551-EG (1994). Before the Florida Public Service Commission. On the Behalf of the Legal Environmental Assistance Foundation. Companies analyzed: Florida Power & Light Company; Florida Power Corporation; Tampa Electric Company; and Gulf Power Company. Issues: Comparison of Forecasted Cost-Effective Conservation Potentials for Florida.

232. Expert Testimony: Docket 920260-TL, (1993). Before the Florida Public Service Commission. On the Behalf of the Florida Public Service Commission Staff. Company analyzed: BellSouth Communications, Inc. Issues: Telephone Demand Forecasts and Empirical Estimates of the Price Elasticity of Demand for Telecommunication Services.

233. Expert Testimony: Docket 920188-TL, (1992). Before the Florida Public Service Commission. On the Behalf of the Florida Public Service Commission Staff. Company analyzed: GTE-Florida. Issues: Telephone Demand Forecasts and Empirical Estimates of the Price Elasticity of Demand for Telecommunication Services.

REFEREE AND EDITORIAL APPOINTMENTS

Contributor, 2014-2018, *Wall Street Journal*, *Journal Reports*, Energy

Editorial Board Member, 2015-2017, *Utilities Policy*

Referee, 2014-Current, *Utilities Policy*

Referee, 2010-Current, *Economics of Energy & Environmental Policy*

Referee, 1995-Current*, Energy Journal*

Contributing Editor, 2000-2005, *Oil, Gas and Energy Quarterly*

Referee, 2005, *Energy Policy*

Referee, 2004, *Southern Economic Journal*

Referee, 2002, *Resource & Energy Economics*

Committee Member, IAEE/USAEE Student Paper Scholarship Award Committee, 2003

PROPOSAL TECHNICAL REVIEWER

California Energy Commission, Public Interest Energy Research (PIER) Program (1999).

PROFESSIONAL ASSOCIATIONS

American Economic Association, American Statistical Association, Southern Economic Association, Western Economic Association, International Association of Energy Economists ("IAEE"), United States Association of Energy Economics ("USAEE"), the National Association for Business Economics ("NABE"), and the Energy Bar Association (National and Louisiana Chapter; current Board member of LA chapter).

HONORS AND AWARDS

Baton Rouge Business Report, Selected as one of the "Capital Region 500" (2023).

National Association of Regulatory Utility Commissioners (NARUC). Best Paper Award for papers published in the *Journal of Applied Regulation* (2004).

Baton Rouge Business Report, Selected as "Top 40 Under 40" (2003).

Omicron Delta Epsilon (1992-Current).

Interstate Oil and Gas Compact Commission (IOGCC) "Best Practice" Award for Research on the Economic Impact of Oil and Gas Activities on State Leases for the Louisiana Department of Natural Resources (2003).

Distinguished Research Award, Academy of Legal, Ethical and Regulatory Issues, Allied Academics (2002).

Florida Public Service Commission, Staff Excellence Award for Assistance in the Analysis of Local Exchange Competition Legislation (1995).

TEACHING EXPERIENCE

Energy and the Environment (Survey Course)

Principles of Microeconomic Theory

Principles of Macroeconomic Theory

Lecturer, Environmental Management and Permitting. Lecture in Natural Gas Industry, LNG and Markets.

Lecturer, Electric Power Industry Environmental Issues, Field Course on Energy and the Environment. (Dept. of Environmental Studies).

Lecturer, Electric Power Industry Trends, Principles Course in Power Engineering (Dept. of Electric Engineering).

Lecturer, LSU Honors College, Senior Course on "Society and the Coast."

Continuing Education. Electric Power Industry Restructuring for Energy Professionals.

"The Gulf Coast Energy Situation: Outlook for Production and Consumption." Educational Course and Lecture Prepared for the Foundation for American Communications and the Society for Professional Journalists, New Orleans, LA, December 2, 2004

"The Impact of Hurricane Katrina on Louisiana's Energy Infrastructure and National Energy Markets." Educational Course and Lecture Prepared for the Foundation for American Communications and the Society for Professional Journalists, Houston, TX, September 13, 2005.

"Forecasting for Regulators: Current Issues and Trends in the Use of Forecasts, Statistical, and Empirical Analyses in Energy Regulation." Instructional Course for State Regulatory Commission Staff. Institute of Public Utilities, Kellogg Center, Michigan State University. July 8-9, 2010.

"Regulatory and Ratemaking Issues with Cost and Revenue Trackers." Michigan State University, Institute of Public Utilities. Advanced Regulatory Studies Program. September 29, 2010.

"Demand Modeling and Forecasting for Regulators." Michigan State University, Institute of Public Utilities. Advanced Regulatory Studies Program. September 30, 2010.

"Demand Modeling and Forecasting for Regulators." Michigan State University, Institute of Public Utilities, Forecasting Workshop, Charleston, SC. March 7-9, 2011.

"Regulatory and Cost Recovery Approaches for Smart Grid Applications." Michigan State University, Institute of Public Utilities, Smart Grid Workshop for Regulators. Charleston, SC. March 7-11, 2011.

"Regulatory and Ratemaking Issues Associated with Cost and Expense Adjustment Mechanisms." Michigan State University, Institute of Public Utilities, Advanced Regulatory Studies Program. Lansing, Michigan. September 28, 2011.

"Utility Incentives, Decoupling, and Renewable Energy Programs." Michigan State University, Institute of Public Utilities, Advanced Regulatory Studies Program. Lansing, Michigan. September 29, 2011.

"Regulatory and Cost Recovery Approaches for Smart Grid Applications." Michigan State University, Institute of Public Utilities, Smart Grid Workshop for Regulators. Charleston, SC. March 6-8, 2012.

"Traditional and Incentive Ratemaking Workshop." New Mexico Public Utilities Commission Staff. Santa Fe, NM October 18, 2012.

"Traditional and Incentive Ratemaking Workshop." New Jersey Board of Public Utilities Staff. Newark, NJ. March 1, 2013.

"Natural Gas Issues and Recent Market Trends." Michigan State University Institute of Public Utilities, GridSchool Regulatory Studies Program, East Lansing, Mich., March 29, 2017.

"Gas Supply Planning and Procurement: Regulatory Overview and issues." Michigan State University Institute of Public Utilities, Basic Regulatory Studies Program, East Lansing, Mich., Aug 17, 2017.

"Natural Gas Supply Issues and Challenges." Michigan State University Institute of Public Utilities, Basic Regulatory Studies Program, East Lansing, Mich., Aug 17, 2017.

"Incentives, Risk and Changes in the Nature of Regulation." Michigan State University Institute of Public Utilities, Basic Regulatory Studies Program, East Lansing, Mich., Aug 18, 2017.

"Traditional and Alternative Forms of Regulation: Background and Overview." Michigan State University Institute of Public Utilities, Advanced Regulatory Studies Program, East Lansing, Mich., October 2, 2017.

"Traditional and Alternative Forms of Regulation: Utility and policy motivations for risk and change." Michigan State University Institute of Public Utilities, Advanced Regulatory Studies Program, East Lansing, Mich., October 2, 2017.

"Traditional and Alternative Forms of Regulation: Incentives and Formula Based Methods." Michigan State University Institute of Public Utilities, Advanced Regulatory Studies Program, East Lansing, Mich., October 2, 2017.

THESIS/DISSERTATIONS COMMITTEES

Active:
1 Thesis Committee Memberships (Environmental Studies)
2 Ph.D. Dissertation Committee (Economics)
Completed:
8 Thesis Committee Memberships (Environmental Studies, Geography)
4 Doctoral Committee Memberships (Information Systems & Decision Sciences, Agricultural and Resource Economics, Economics, Education and Workforce Development).
2 Doctoral Examination Committee Membership (Information Systems & Decision Sciences, Education and Workforce Development)
1 Senior Honors Thesis (Journalism, Loyola University)

LSU SERVICE AND COMMITTEE MEMBERSHIPS

Committee Member, Energy Education Curriculum Committee. E.J. Ourso College of Business. LSU (2016-Current).

Chairman, LSU Energy Initiative/LSU Energy Council (2014-Current).

Co-Director & Steering Committee Member, LSU Coastal Marine Institute (2009-2014).

CES Promotion Committee, Division of Radiation Safety (2006).

Search Committee Chair (2006), Research Associate 4 Position.

Search Committee Member (2005), Research Associate 4 Position.

Search Committee Member (2005), CES Communications Manager.

LSU Graduate Research Faculty, Associate Member (1997-2004); Full Member (2004-2010); Affiliate Member with Full Directional Rights (2011-2014); Full Member (2014-current).

LSU Faculty Senate (2003-2006).

Conference Coordinator. (2005-Current) Center for Energy Studies Conference on Alternative Energy.

LSU CES/SCE Public Art Selection Committee (2003-2005).

Conference Coordinator. Center for Energy Studies Annual Energy Conference/Summit. (2003-Current).

Conference Coordinator. Center for Energy Studies Seminar Series on Electric Utility Restructuring and Wholesale Competition. (1996-2003).

Co-Chairman, Review Committee, Louisiana Port Construction and Development Priority Program Rules and Regulations, On Behalf of the LSU Ports and Waterways Institute. (1997).

LSU Main Campus Cogeneration/Turbine Project, (1999-2000).

LSU InterCollege Environmental Cooperative. (1999-2001).

LSU Faculty Senate Committee on Public Relations (1997-1999).

LSU Faculty Senate Committee on Student Retention and Recruitment (1999-2003).

PROFESSIONAL SERVICE

Board Member (2018). Energy Bar Association, Louisiana Chapter.

Program Committee Member (2017). Gulf Coast Power Association Conference. New Orleans.

Program Committee Member (2016). Gulf Coast Power Association Conference. New Orleans.

Program Committee Member (2015). Gulf Coast Power Association Workshop/Special Briefing. "Gulf Coast Disaster Readiness: A Past, Present and Future Look at Power and Industry Readiness in MISO South."

Advisor (2008). National Association of Regulatory Utility Commissioners. Study Committee on the Impact of Executive Drilling Moratoria on Federal Lands.

Steering Committee Member, Louisiana Representative (2008-Current). Southeast Agriculture & Forestry Energy Resources Alliance. Southern Policies Growth Board.

Advisor (2007-Current). National Association of State Utility Consumer Advocates ("NASUCA"), Natural Gas Committee.

Program Committee Chairman (2007-2008). U.S. Association of Energy Economics ("USAEE") Annual Conference, New Orleans, LA

Finance Committee Chairman (2007-2008). USAEE Annual Conference, New Orleans, LA

Committee Member (2006), International Association for Energy Economics Nominating Committee.

Founding President (2005-2007) Louisiana Chapter, USAEE.

Secretary (2001) Houston Chapter, USAEE.

Advisor, Louisiana LNG Buyers/Developers Summit, Office of the Governor/Louisiana Department of Economic Development/Louisiana Department of Natural Resources, and Greater New Orleans, Inc. (2004).

Table of Exhibits

Results of I&M's Allocated Cost of Service Study – Current RROR

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service Secondary (GS-SEC)	General Service Primary (GS-PRI)	General Service Substation (GS-SUB)	General Service Transmission (GS-TRAN)	Large General Service Secondary (LGS-SEC)	Large General Service Primary (LGS-PRI)	Large General Service Substation (LGS-SUB)	Large General Service Transmission (LGS-TRAN)
1	**Rate Base**										
2	Electric Plant in Service	$ 8,122,400,787	$3,863,706,928	$951,628,336	$18,097,987	$ 45,051	$ 815,262	$1,610,360,997	$108,945,691	$ -	$ 242,058
3	Accumulated Depreciation and Amortization	(3,074,933,906)	(1,410,917,036)	(355,783,370)	(7,269,311)	(18,652)	(384,997)	(621,646,055)	(43,662,215)	-	(114,475)
4	Net Plant in Service	$ 5,047,466,882	$2,452,789,892	$595,844,966	$10,828,676	$ 26,399	$ 430,265	$ 988,714,942	$ 65,283,476	$ -	$ 127,583
5	Working Capital	$ 189,720,191	$ 79,839,529	$ 21,147,298	$ 452,720	$ 1,236	$ 26,253	$ 39,562,722	$ 2,844,334	$ -	$ 6,829
6	Total Rate Base Offsets	186,519,044	86,657,132	21,160,665	441,777	1,118	25,238	37,127,405	2,648,525	-	7,438
7	**Total Rate Base**	**$ 5,423,706,117**	**$2,619,286,553**	**$638,152,929**	**$11,723,174**	**$ 28,752**	**$ 481,756**	**$1,065,405,069**	**$ 70,776,335**	**$ -**	**$ 141,850**
8	**Operating Income**										
9	**Operating Revenues**										
10	Firm Sales of Electricity	$ 1,233,024,597	$ 539,225,575	$153,091,563	$ 3,111,738	$ 15,158	$ 158,869	$ 246,220,545	$ 16,229,002	$ -	$ 29,757
11	Interruptible	95,716,524	33,274,073	9,810,317	227,053	738	14,082	21,003,584	1,562,717	-	2,627
12	Sales for Resale	47,581,224	16,424,567	4,861,319	112,508	368	6,963	10,455,290	777,784	-	1,271
13	Other Operating Revenues	165,093,436	73,844,506	18,667,738	412,726	1,444	20,713	33,355,773	2,452,049	-	5,162
14	Gain on Sale of Emission Allowance	1,618,627	558,662	165,364	3,827	13	237	355,679	26,459	-	43
15	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 663,327,383**	**$186,596,300**	**$ 3,867,852**	**$ 17,721**	**$ 200,863**	**$ 311,390,871**	**$ 21,048,012**	**$ -**	**$ 38,860**
16	**Operating Expenses**										
17	O&M Expenses	$ 802,688,016	$ 338,693,577	$ 88,101,174	$ 1,894,576	$ 5,370	$ 110,687	$ 165,567,953	$ 11,998,163	$ -	$ 27,890
18	Depreciation and Amortization Expense	362,792,895	169,053,615	42,084,600	838,508	2,118	42,946	72,598,139	5,041,101	-	12,748
19	Regulatory Debits and Credits	1,310,661	559,723	148,175	3,433	9	226	274,800	20,548	-	67
20	Taxes Other than Income	64,923,421	31,378,236	7,611,283	141,212	351	6,049	12,708,269	850,812	-	1,790
21	Other O&M Expenses	8,707,212	3,808,737	1,077,198	21,971	105	1,132	1,741,502	115,353	-	219
22	Total State Income Tax	9,308,205	3,275,882	1,689,498	34,462	450	1,238	1,758,411	70,337	-	(414)
23	Total Federal Income Tax	34,139,615	11,374,484	6,412,084	135,572	1,816	5,265	6,477,486	254,565	-	(1,559)
24	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 558,144,254**	**$147,124,010**	**$ 3,069,734**	**$ 10,218**	**$ 167,543**	**$ 261,126,559**	**$ 18,350,881**	**$ -**	**$ 40,740**
25	**Net Operating Income**	**$ 259,164,384**	**$ 105,183,129**	**$ 39,472,290**	**$ 798,118**	**$ 7,503**	**$ 33,320**	**$ 50,264,311**	**$ 2,697,131**	**$ -**	**$ (1,880)**
26	**Rate of Return on Rate Base ("ROR")**	**4.78%**	**4.02%**	**6.19%**	**6.81%**	**26.10%**	**6.92%**	**4.72%**	**3.81%**	**-**	**-1.33%**
27	**Relative Rate of Return ("RROR")**	**1.00**	**0.84**	**1.29**	**1.42**	**5.46**	**1.45**	**0.99**	**0.80**	**-**	**-0.28**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1.

Results of I&M's Allocated Cost of Service Study – Current RROR

Line No.	Account Description	Total IM-Indiana	Industrial Power				Municipal and School Service	Water and Sewage Service			Electric Heating General	Irrigation Service	Outdoor Lighting	Street Lighting
			Secondary (IP-SEC)	Primary (IP-PRI)	Substation (IP-SUB)	Transmission (IP-TRAN)	(MS)	Secondary (WSS-SEC)	Primary (WSS-PRI)	Substation (WSS-SUB)	(EHG)	(IS)	(OL)	(SL)
1	**Rate Base**													
2	Electric Plant in Service	$ 8,122,400,787	$222,026,658	$772,546,724	$235,636,380	$169,788,490	$ 18,467,962	$35,513,270	$22,079,322	$4,151,915	$ 4,271,199	$1,370,001	$42,747,130	$39,959,427
3	Accumulated Depreciation and Amortization	(3,074,933,906)	(86,026,664)	(311,345,778)	(103,514,217)	(80,205,028)	(7,051,048)	(13,518,806)	(8,884,087)	(1,820,496)	(1,600,154)	(371,443)	(10,708,954)	(10,091,118)
4	Net Plant in Service	$ 5,047,466,882	$135,999,993	$461,200,945	$132,122,163	$ 89,583,462	$ 11,416,914	$21,994,464	$13,195,235	$2,331,420	$ 2,671,045	$ 998,557	$32,038,175	$29,868,309
5	Working Capital	$ 189,720,191	$ 5,837,561	$ 22,008,105	$ 7,714,756	$ 6,807,644	$ 416,083	$ 926,131	$ 629,827	$ 131,300	$ 90,888	$ 19,208	$ 594,544	$ 663,223
6	Total Rate Base Offsets	186,519,044	5,163,972	19,104,362	6,379,772	5,335,197	417,098	806,352	545,161	111,793	93,810	17,434	337,565	137,232
7	**Total Rate Base**	**$ 5,423,706,117**	**$147,001,526**	**$502,313,412**	**$146,216,691**	**$101,726,302**	**$ 12,250,095**	**$23,726,947**	**$14,370,222**	**$2,574,513**	**$ 2,855,743**	**$1,035,199**	**$32,970,285**	**$30,668,764**
8	**Operating Income**													
9	**Operating Revenues**													
10	Firm Sales of Electricity	$ 1,233,024,597	$ 38,042,002	$131,643,102	$ 44,099,292	$ 37,565,510	$ 2,611,543	$ 5,636,554	$ 3,462,931	$ 636,864	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
11	Interruptible	95,716,524	3,478,196	13,875,411	5,401,008	5,065,833	186,405	564,155	399,310	88,155	37,375	7,206	292,039	426,240
12	Sales for Resale	47,581,224	1,739,466	6,944,632	2,705,840	2,543,090	92,100	282,563	199,907	44,090	18,404	3,646	149,394	218,026
13	Other Operating Revenues	165,093,436	4,610,937	17,495,403	8,410,076	3,604,218	363,053	714,249	497,397	147,595	83,839	9,668	190,133	206,757
14	Gain on Sale of Emission Allowance	1,618,627	59,180	236,273	92,061	86,527	3,133	9,614	6,801	1,500	626	124	5,085	7,421
15	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 47,929,780**	**$170,194,821**	**$ 60,708,277**	**$ 48,865,178**	**$ 3,256,234**	**$ 7,207,134**	**$ 4,566,346**	**$ 918,205**	**$ 706,227**	**$ 176,855**	**$ 6,414,336**	**$ 5,603,155**
16	**Operating Expenses**													
17	O&M Expenses	$ 802,688,016	$ 24,737,290	$ 94,453,385	$ 33,914,516	$ 29,876,105	$ 1,710,800	$ 3,937,468	$ 2,705,666	$ 574,354	$ 371,844	$ 72,606	$ 2,021,771	$ 1,912,821
18	Depreciation and Amortization Expense	362,792,895	10,038,059	35,913,237	11,514,800	8,963,588	826,707	1,587,097	1,025,182	202,509	188,693	49,050	1,473,341	1,336,857
19	Regulatory Debits and Credits	1,310,661	38,277	147,803	55,167	47,111	3,057	5,826	4,206	968	669	42	217	335
20	Taxes Other than Income	64,923,421	1,750,988	6,031,485	1,790,404	1,264,978	146,192	281,814	172,479	31,549	34,021	11,693	374,259	335,557
21	Other O&M Expenses	8,707,212	267,817	930,167	312,371	265,995	18,520	39,748	24,560	4,557	4,018	1,080	39,567	32,593
22	Total State Income Tax	9,308,205	394,327	1,066,695	477,074	276,732	14,094	42,926	15,707	2,121	2,293	1,396	104,181	80,797
23	Total Federal Income Tax	34,139,615	1,495,970	4,049,850	1,927,471	1,117,611	50,261	155,023	55,696	8,667	7,568	3,727	351,217	256,840
24	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 38,722,727**	**$142,592,622**	**$ 49,991,803**	**$ 41,812,120**	**$ 2,769,633**	**$ 6,049,903**	**$ 4,003,497**	**$ 824,726**	**$ 609,107**	**$ 139,594**	**$ 4,364,553**	**$ 3,955,799**
25	**Net Operating Income**	**$ 259,164,384**	**$ 9,207,053**	**$ 27,602,199**	**$ 10,716,474**	**$ 7,053,058**	**$ 486,601**	**$ 1,157,231**	**$ 562,849**	**$ 93,478**	**$ 97,119**	**$ 37,261**	**$ 2,049,783**	**$ 1,647,355**
26	**Rate of Return on Rate Base ("ROR")**	**4.78%**	**6.26%**	**5.50%**	**7.33%**	**6.93%**	**3.97%**	**4.88%**	**3.92%**	**3.63%**	**3.40%**	**3.60%**	**6.22%**	**5.37%**
27	**Relative Rate of Return ("RROR")**	**1.00**	**1.31**	**1.15**	**1.53**	**1.45**	**0.83**	**1.02**	**0.82**	**0.76**	**0.71**	**0.75**	**1.30**	**1.12**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1.

Results of I&M's Allocated Cost of Service Study – Required Increase at Equalized Rates

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service Secondary (GS-SEC)	General Service Primary (GS-PRI)	General Service Substation (GS-SUB)	General Service Transmission (GS-TRAN)	Large General Service Secondary (LGS-SEC)	Large General Service Primary (LGS-PRI)	Large General Service Substation (LGS-SUB)	Large General Service Transmission (LGS-TRAN)
1	**Required Income Under Company's Proposed ROR**										
2	Total Rate Base	$ 5,423,706,117	$ 2,619,286,553	$ 638,152,929	$11,723,174	$ 28,752	$ 481,756	$ 1,065,405,069	$ 70,776,335	$ -	$ 141,850
3	Proposed Rate of Return	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%
4	**Required Operating Income @ 6.47% ROR**	**$ 351,025,434**	**$ 169,521,759**	**$ 41,301,631**	**$ 758,731**	**$ 1,861**	**$ 31,180**	**$ 68,953,640**	**$ 4,580,686**	**$ -**	**$ 9,181**
5	**Operating Expenses**										
6	O&M Expenses	$ 802,688,016	$ 338,693,577	$ 88,101,174	$ 1,894,576	$ 5,370	$ 110,687	$ 165,567,953	$ 11,998,163	$ -	$ 27,890
7	Depreciation and Amortization Expense	362,792,895	169,053,615	42,084,600	838,508	2,118	42,946	72,598,139	5,041,101	-	12,748
8	Regulatory Debits and Credits	1,310,661	559,723	148,175	3,433	9	226	274,800	20,548	-	67
9	Taxes Other than Income	64,923,421	31,378,236	7,611,283	141,212	351	6,049	12,708,269	850,812	-	1,790
10	Other O&M Expenses	8,707,212	3,808,737	1,077,198	21,971	105	1,132	1,741,502	115,353	-	219
11	Total State Income Tax	9,308,205	3,275,882	1,689,498	34,462	450	1,238	1,758,411	70,337	-	(414)
12	Total Federal Income Tax	34,139,615	11,374,484	6,412,084	135,572	1,816	5,265	6,477,486	254,565	-	(1,559)
13	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 558,144,254**	**$ 147,124,010**	**$ 3,069,734**	**$ 10,218**	**$ 167,543**	**$ 261,126,559**	**$ 18,350,881**	**$ -**	**$ 40,740**
14	**Total Revenue Requirement**	**$ 1,634,895,458**	**$ 727,666,012**	**$ 188,425,641**	**$ 3,828,465**	**$ 12,079**	**$ 198,723**	**$ 330,080,199**	**$ 22,931,567**	**$ -**	**$ 49,921**
15	**Operating Revenues**										
16	Firm Sales of Electricity	$ 1,233,024,597	$ 539,225,575	$ 153,091,563	$ 3,111,738	$ 15,158	$ 158,869	$ 246,220,545	$ 16,229,002	$ -	$ 29,757
17	Interruptible	95,716,524	33,274,073	9,810,317	227,053	738	14,082	21,003,584	1,562,717	-	2,627
18	Sales for Resale	47,581,224	16,424,567	4,861,319	112,508	368	6,963	10,455,290	777,784	-	1,271
19	Other Operating Revenues	165,093,436	73,844,506	18,667,738	412,726	1,444	20,713	33,355,773	2,452,049	-	5,162
20	Gain on Sale of Emission Allowance	1,618,627	558,662	165,364	3,827	13	237	355,679	26,459	-	43
21	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 663,327,383**	**$ 186,596,300**	**$ 3,867,852**	**$ 17,721**	**$ 200,863**	**$ 311,390,871**	**$ 21,048,012**	**$ -**	**$ 38,860**
22	**Revenue Deficiency/(Surplus)**	**$ 91,861,050**	**$ 64,338,630**	**$ 1,829,341**	**$ (39,387)**	**$ (5,642)**	**$ (2,140)**	**$ 18,689,328**	**$ 1,883,555**	**$ -**	**$ 11,061**
23	**Required Rate Increase (Decrease)**	**7.45%**	**11.93%**	**1.19%**	**-1.27%**	**-37.22%**	**-1.35%**	**7.59%**	**11.61%**	**-**	**37.17%**
24	**Relative Rate Increase**	**1.00**	**1.60**	**0.16**	**-0.17**	**-5.00**	**-0.18**	**1.02**	**1.56**	**-**	**4.99**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1.

Results of I&M's Allocated Cost of Service Study – Required Increase at Equalized Rates

Line No.	Account Description	Total IM-Indiana	Industrial Power Secondary (IP-SEC)	Industrial Power Primary (IP-PRI)	Industrial Power Substation (IP-SUB)	Industrial Power Transmission (IP-TRAN)	Municipal and School Service (MS)	Water and Sewage Service Secondary (WSS-SEC)	Water and Sewage Service Primary (WSS-PRI)	Water and Sewage Service Substation (WSS-SUB)	Electric Heating General (EHG)	Irrigation Service (IS)	Outdoor Lighting (OL)	Street Lighting (SL)
1	**Required Income Under Company's Proposed ROR**													
2	Total Rate Base	$ 5,423,706,117	$ 147,001,526	$ 502,313,412	$ 146,216,691	$ 101,726,302	$ 12,250,095	$23,726,947	$14,370,222	$ 2,574,513	$ 2,855,743	$ 1,035,199	$32,970,285	$30,668,764
3	Proposed Rate of Return	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%
4	**Required Operating Income @ 6.47% ROR**	**$ 351,025,434**	**$ 9,514,025**	**$ 32,510,018**	**$ 9,463,230**	**$ 6,583,786**	**$ 792,833**	**$ 1,535,622**	**$ 930,049**	**$ 166,624**	**$ 184,825**	**$ 66,999**	**$ 2,133,856**	**$ 1,984,900**
5	**Operating Expenses**													
6	O&M Expenses	$ 802,688,016	$ 24,737,290	$ 94,453,385	$ 33,914,516	$ 29,876,105	$ 1,710,800	$ 3,937,468	$ 2,705,666	$ 574,354	$ 371,844	$ 72,606	$ 2,021,771	$ 1,912,821
7	Depreciation and Amortization Expense	362,792,895	10,038,059	35,913,237	11,514,800	8,963,588	826,707	1,587,097	1,025,182	202,509	188,693	49,050	1,473,341	1,336,857
8	Regulatory Debits and Credits	1,310,661	38,277	147,803	55,167	47,111	3,057	5,826	4,206	968	669	42	217	335
9	Taxes Other than Income	64,923,421	1,750,988	6,031,485	1,790,404	1,264,978	146,192	281,814	172,479	31,549	34,021	11,693	374,259	335,557
10	Other O&M Expenses	8,707,212	267,817	930,167	312,371	265,995	18,520	39,748	24,560	4,557	4,018	1,080	39,567	32,593
11	Total State Income Tax	9,308,205	394,327	1,066,695	477,074	276,732	14,094	42,926	15,707	2,121	2,293	1,396	104,181	80,797
12	Total Federal Income Tax	34,139,615	1,495,970	4,049,850	1,927,471	1,117,611	50,261	155,023	55,696	8,667	7,568	3,727	351,217	256,840
13	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 38,722,727**	**$ 142,592,622**	**$ 49,991,803**	**$ 41,812,120**	**$ 2,769,633**	**$ 6,049,903**	**$ 4,003,497**	**$ 824,726**	**$ 609,107**	**$ 139,594**	**$ 4,364,553**	**$ 3,955,799**
14	**Total Revenue Requirement**	**$ 1,634,895,458**	**$ 48,236,752**	**$ 175,102,640**	**$ 59,455,033**	**$ 48,395,906**	**$ 3,562,466**	**$ 7,585,525**	**$ 4,933,546**	**$ 991,350**	**$ 793,933**	**$ 206,593**	**$ 6,498,409**	**$ 5,940,700**
15	**Operating Revenues**													
16	Firm Sales of Electricity	$ 1,233,024,597	$ 38,042,002	$ 131,643,102	$ 44,099,292	$ 37,565,510	$ 2,611,543	$ 5,636,554	$ 3,462,931	$ 636,864	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
17	Interruptible	95,716,524	3,478,196	13,875,411	5,401,008	5,065,833	186,405	564,155	399,310	88,155	37,375	7,206	292,039	426,240
18	Sales for Resale	47,581,224	1,739,466	6,944,632	2,705,840	2,543,090	92,100	282,563	199,907	44,090	18,404	3,646	149,394	218,026
19	Other Operating Revenues	165,093,436	4,610,937	17,495,403	8,410,076	3,604,218	363,053	714,249	497,397	147,595	83,839	9,668	190,133	206,757
20	Gain on Sale of Emission Allowance	1,618,627	59,180	236,273	92,061	86,527	3,133	9,614	6,801	1,500	626	124	5,085	7,421
21	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 47,929,780**	**$ 170,194,821**	**$ 60,708,277**	**$ 48,865,178**	**$ 3,256,234**	**$ 7,207,134**	**$ 4,566,346**	**$ 918,205**	**$ 706,227**	**$ 176,855**	**$ 6,414,336**	**$ 5,603,155**
22	**Revenue Deficiency/(Surplus)**	**$ 91,861,050**	**$ 306,971**	**$ 4,907,819**	**$ (1,253,244)**	**$ (469,272)**	**$ 306,232**	**$ 378,391**	**$ 367,200**	**$ 73,145**	**$ 87,706**	**$ 29,738**	**$ 84,073**	**$ 337,545**
23	**Required Rate Increase (Decrease)**	**7.45%**	**0.81%**	**3.73%**	**-2.84%**	**-1.25%**	**11.73%**	**6.71%**	**10.60%**	**11.49%**	**15.50%**	**19.04%**	**1.46%**	**7.11%**
24	**Relative Rate Increase**	**1.00**	**0.11**	**0.50**	**-0.38**	**-0.17**	**1.57**	**0.90**	**1.42**	**1.54**	**2.08**	**2.56**	**0.20**	**0.95**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1.

I&M's Estimates System Load Factor for 2024 Test Year

Item	Calculation
Monthly Coincident Peak (kW)	
January	1,995,394
Febuary	2,025,653
March	1,809,179
April	1,636,227
May	2,315,486
June	2,439,103
July	2,468,532
August	2,426,679
September	2,046,736
October	1,823,970
November	1,831,383
December	1,715,033
12 CP Average (Jan-Dec)	**2,044,448**
6 CP Average (Dec/Jan/Feb/Jun/Jul/Aug)	**2,178,399**
Loss-Adjusted Energy at Generation (kWh)	13,393,396,768
Annual Hours	8,784
Average Hourly Demand (kW)	**1,524,749**
12 CP Load Factor	**74.58%**
6 CP Load Factor	**69.99%**

Note: 2024 is a Leap Year.

Source: Direct Testimony of Michael S. Small, WP-MSS-10; and Company's Response to Data Request OUCC 6-08.

Analysis of I&M Generation Unit Capacity Factors, 2022

Witness: Dismukes
Cause No. 45933
Exhibit DED-3

Station Name	Plant Type	Nameplate Capacity (MW)	2022 Net Generation (MWh)	Capacity Factor	Allocation		Plant in Service		
					Energy	Demand	Energy	Demand	Total
Donald C Cook Plant	Nuclear	2285	16,623,325	83.05%	83.05%	16.95%	$ 3,413,445,667	$ 696,777,561	$4,110,223,228
Rockport Unit 2 I&M	Steam	650	1,710,559	30.04%	30.04%	69.96%	99,625,144	232,000,699	331,625,843
Rockport Unit 1 I&M	Steam	660	1,250,366	21.63%	21.63%	78.37%	201,089,334	728,732,888	929,822,222
Subtotals:							**$ 3,714,160,145**	**$ 1,657,511,148**	**$5,371,671,293**
					Production Plant Classification:		**69.14%**	**30.86%**	**100.00%**

Source: FERC Form 1.

Analysis of I&M Generation Unit Costs to PJM Estimated CONE Price

Witness: Dismukes
Cause No. 45933
Exhibit DED-4

Station Name	Plant Type	Estimated Service Life	Nameplate Capacity (MW)	Total Plant in Service	Fixed Cost ($/year)	Variable Costs ($)	Levelized Cost ($/kW-year)	PJM Default Gross CONE Combustion Turbine ($/MW-day)	PJM Default Gross CONE Combustion Turbine ($/kW-year)	Allocation Energy	Allocation Demand	Plant in Service Energy	Plant in Service Demand	Plant in Service Total
Donald C Cook Plant	Nuclear	59.0	2285	4,110,223,228	69,664,800	329,100,788	175	294.00	107.31	38.51%	61.49%	1,582,822,334	2,527,400,894	4,110,223,228
Rockport Unit 2 I&M	Steam	39.0	650	331,625,843	8,503,227	154,332,175	251	294.00	107.31	57.16%	42.84%	189,571,967	142,053,876	331,625,843
Rockport Unit 1 I&M	Steam	44.0	660	929,822,222	21,132,323	72,289,017	142	294.00	107.31	24.19%	75.81%	224,905,264	704,916,958	929,822,222
Subtotals:												**$1,997,299,565**	**$3,374,371,728**	**$5,371,671,293**
									Production Plant Classification:			**37.18%**	**62.82%**	**100.00%**

Source: FERC Form 1.

I&M's Historic Monthly Peak Demands, 2018-2022

Witness: Dismukes
Cause No. 45933
Exhibit DED-5

Month	2018	2019	2020	2021	2022
January	3,723	3,770	3,339	3,136	3,355
February	3,538	3,674	3,346	3,367	3,204
March	3,317	3,486	3,127	3,094	3,001
April	3,264	3,159	2,614	2,821	2,786
May	4,103	3,226	3,578	3,380	3,477
June	4,369	3,873	3,593	3,708	3,850
July	4,221	4,191	3,970	3,717	3,821
August	4,257	3,941	3,808	4,012	3,758
September	4,286	4,040	3,346	3,642	3,479
October	3,608	3,702	2,783	2,949	2,787
November	3,360	3,409	2,936	3,027	3,063
December	3,407	3,445	2,979	3,078	3,200
1 CP	**4,369**	**4,191**	**3,970**	**4,012**	**3,850**
6 CP	**3,919**	**3,816**	**3,506**	**3,503**	**3,531**
12 CP	**3,788**	**3,660**	**3,285**	**3,328**	**3,315**

Source: FERC Form 1.

Results of FERC Tests, 2018-2022

FERC Tests	2018	2019	2020	2021	2022
1) On and Off Peak Test					
6 CP Data:					
Annual Maximum Demand (MW)	4,369	4,191	3,970	4,012	3,850
Average 6 CP Peak Demand (MW)	3,919	3,816	3,506	3,503	3,531
Average 6 CP Off-Peak Demand (MW)	3,656	3,504	3,064	3,152	3,099
Test:					
6 CP to Annual Maximum Demand	90%	91%	88%	87%	92%
Off-Peak 6 CP to Annual Maximum Demand	84%	84%	77%	79%	80%
Difference between On-Peak and Off-Peak	6.0%	7.4%	11.1%	8.7%	11.2%
Difference Less than 19%?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
2) Low to Annual Peak Test					
Data:					
Lowest Monthly Peak Demand (MW)	3,264	3,159	2,614	2,821	2,786
Annual Maximum Demand (MW)	4,369	4,191	3,970	4,012	3,850
Test:					
Lowest to Annual Maximum Demand	74.7%	75.4%	65.8%	70.3%	72.4%
Lowest Monthly Peak at least 66% of Max?	**Yes**	**Yes**	**No**	**Yes**	**Yes**
3) Average to Annual Peak Test					
Data:					
Average 12 CP Peak Demand (MW)	3,788	3,660	3,285	3,328	3,315
Annual Maximum Demand (MW)	4,369	4,191	3,970	4,012	3,850
Test:					
12 CP to Annual Maximum Demand	86.7%	87.3%	82.7%	82.9%	86.1%
12 CP is at least 81% of Max?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

Source: FERC Form 1.

Estimated Results of FERC Tests, 2024

FERC Test Calculation	2024 Test Year
1) On and Off Peak Test: tested against the following Peak methods	
4CP:	
Peaks/Annual Max	95%
Off-Peak/Annual Max	77%
Difference (12 CP at maximum 19%)	18.3%
Is 12 CP a better fit than 4CP ?	**Yes**
6CP:	
Peaks/Annual Max	88%
Off-Peak/Annual Max	77%
Difference (12 CP at maximum 19%)	10.9%
Is 12 CP a better fit than 6CP ?	**Yes**
2) Ratio - Low to Annual Max:	
Difference (12 CP minimum 66%)	66.3%
12 CP a good fit?	**Yes**
3) Ratio - Average to Annual Max:	
Difference (12 CP minimum 81%)	82.8%
12 CP a good fit?	**Yes**

Source: Company's Response to OUCC 6-08, Attachment 1.

Results of Alternative Proposed Allocated Cost of Service Study – RROR at Current Rates

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service Secondary (GS-SEC)	General Service Primary (GS-PRI)	General Service Substation (GS-SUB)	General Service Transmission (GS-TRAN)	Large General Service Secondary (LGS-SEC)	Large General Service Primary (LGS-PRI)	Large General Service Substation (LGS-SUB)	Large General Service Transmission (LGS-TRAN)
1	**Rate Base**										
2	Electric Plant in Service	$ 8,122,400,787	$3,557,768,788	$929,432,633	$17,567,739	$ 53,113	$ 739,597	$1,659,054,670	$112,213,751	$ -	$ 127,212
3	Accumulated Depreciation and Amortization	(3,074,933,906)	(1,261,949,959)	(342,800,099)	(6,961,454)	(21,853)	(345,489)	(644,044,360)	(45,162,034)	-	(60,023)
4	Net Plant in Service	$ 5,047,466,882	$2,295,818,828	$586,632,534	$10,606,285	$ 31,260	$ 394,108	$1,015,010,310	$ 67,051,718	$ -	$ 67,188
5	Working Capital	$ 189,720,191	$ 72,778,973	$ 20,433,193	$ 435,875	$ 1,354	$ 24,260	$ 40,564,808	$ 2,911,270	$ -	$ 4,315
6	Total Rate Base Offsets	186,519,044	76,862,253	20,182,422	418,691	1,287	22,487	38,525,048	2,741,905	-	3,942
7	**Total Rate Base**	**$ 5,423,706,117**	**$2,445,460,055**	**$627,248,150**	**$11,460,851**	**$ 33,901**	**$ 440,855**	**$1,094,100,165**	**$ 72,704,892**	**$ -**	**$ 75,445**
8	**Operating Income**										
9	**Operating Revenues**										
10	Firm Sales of Electricity	$ 1,233,024,597	$ 539,225,575	$153,091,563	$ 3,111,738	$ 15,158	$ 158,869	$ 246,220,545	$ 16,229,002	$ -	$ 29,757
11	Interruptible	95,716,524	33,072,889	9,789,397	226,560	741	14,024	21,031,793	1,564,601	-	2,555
12	Sales for Resale	47,581,224	16,422,770	4,861,132	112,503	368	6,962	10,455,542	777,801	-	1,270
13	Other Operating Revenues	165,093,436	69,095,181	19,249,322	425,637	1,878	20,672	34,669,972	2,541,714	-	2,754
14	Gain on Sale of Emission Allowance	1,618,627	558,662	165,364	3,827	13	237	355,679	26,459	-	43
15	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 658,375,077**	**$187,156,778**	**$ 3,880,265**	**$ 18,158**	**$ 200,764**	**$ 312,733,530**	**$ 21,139,577**	**$ -**	**$ 36,380**
16	**Operating Expenses**										
17	O&M Expenses	$ 802,688,016	$ 312,189,743	$ 85,510,941	$ 1,833,405	$ 5,846	$ 103,314	$ 169,384,044	$ 12,253,225	$ -	$ 18,391
18	Depreciation and Amortization Expense	362,792,895	152,475,724	40,628,272	803,986	2,470	38,535	75,083,830	5,207,527	-	6,696
19	Regulatory Debits and Credits	1,310,661	468,957	138,736	3,211	11	200	287,527	21,398	-	35
20	Taxes Other than Income	64,923,421	29,147,246	7,460,433	137,596	413	5,511	13,069,993	875,107	-	945
21	Other O&M Expenses	8,707,212	3,784,612	1,074,728	21,913	105	1,125	1,744,908	115,581	-	210
22	Total State Income Tax	9,308,205	5,589,197	1,956,826	40,742	422	1,932	1,450,197	49,808	-	387
23	Total Federal Income Tax	34,139,615	20,487,481	7,464,244	160,292	1,706	7,998	5,262,751	173,657	-	1,598
24	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 524,142,961**	**$144,234,180**	**$ 3,001,146**	**$ 10,973**	**$ 158,616**	**$ 266,283,250**	**$ 18,696,302**	**$ -**	**$ 28,262**
25	**Net Operating Income**	**$ 259,164,384**	**$ 134,232,116**	**$ 42,922,599**	**$ 879,119**	**$ 7,185**	**$ 42,149**	**$ 46,450,280**	**$ 2,443,275**	**$ -**	**$ 8,118**
26	**Rate of Return on Rate Base ("ROR")**	**4.78%**	**5.49%**	**6.84%**	**7.67%**	**21.19%**	**9.56%**	**4.25%**	**3.36%**	**-**	**10.76%**
27	**Relative Rate of Return ("RROR")**	**1.00**	**1.15**	**1.43**	**1.61**	**4.44**	**2.00**	**0.89**	**0.70**	**-**	**2.25**

Results of Alternative Proposed Allocated Cost of Service Study – RROR at Current Rates

Line No.	Account Description	Total IM-Indiana	IP Secondary (IP-SEC)	IP Primary (IP-PRI)	IP Substation (IP-SUB)	IP Transmission (IP-TRAN)	(MS)	WSS Secondary (WSS-SEC)	WSS Primary (WSS-PRI)	WSS Substation (WSS-SUB)	(EHG)	(IS)	Outdoor Lighting (OL)	Street Lighting (SL)
1	**Rate Base**													
2	Electric Plant in Service	$ 8,122,400,787	$249,063,082	$884,966,783	$288,090,562	$227,602,510	$17,487,859	$40,132,820	$25,054,178	$4,649,457	$3,892,254	$1,570,846	$51,001,903	$51,931,030
3	Accumulated Depreciation and Amortization	(3,074,933,906)	(99,244,421)	(367,436,283)	(129,189,459)	(109,457,003)	(6,514,844)	(15,880,051)	(10,417,866)	(2,087,338)	(1,405,784)	(465,002)	(15,068,871)	(16,421,711)
4	Net Plant in Service	$ 5,047,466,882	$149,818,662	$517,530,500	$158,901,104	$118,145,507	$10,973,015	$24,252,769	$14,636,312	$2,562,119	$2,486,469	$1,105,844	$35,933,033	$35,509,318
5	Working Capital	$ 189,720,191	$ 6,466,454	$ 24,727,925	$ 8,937,774	$ 8,244,068	$ 387,992	$ 1,043,125	$ 706,393	$ 145,063	$ 81,228	$ 23,450	$ 816,643	$ 986,027
6	Total Rate Base Offsets	186,519,044	6,036,112	22,869,773	8,075,659	7,321,620	378,466	968,015	650,891	130,746	80,465	23,343	643,733	582,187
7	**Total Rate Base**	**$ 5,423,706,117**	**$162,321,228**	**$565,128,199**	**$175,914,537**	**$133,711,194**	**$11,739,472**	**$26,263,909**	**$15,993,596**	**$2,837,928**	**$2,648,163**	**$1,152,637**	**$37,393,409**	**$37,077,532**
8	**Operating Income**													
9	**Operating Revenues**													
10	Firm Sales of Electricity	$ 1,233,024,597	$ 38,042,002	$131,643,102	$ 44,099,292	$ 37,565,510	$ 2,611,543	$ 5,636,554	$ 3,462,931	$ 636,864	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
11	Interruptible	95,716,524	3,496,130	13,953,265	5,435,892	5,107,052	185,589	567,518	401,514	88,554	37,097	7,326	298,457	435,570
12	Sales for Resale	47,581,224	1,739,626	6,945,327	2,706,151	2,543,458	92,093	282,593	199,927	44,093	18,401	3,647	149,451	218,109
13	Other Operating Revenues	165,093,436	5,007,996	18,665,497	9,167,195	4,032,955	372,941	738,330	507,283	144,856	82,151	14,589	173,334	179,176
14	Gain on Sale of Emission Allowance	1,618,627	59,180	236,273	92,061	86,527	3,133	9,614	6,801	1,500	626	124	5,085	7,421
15	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 48,344,933**	**$171,443,464**	**$ 61,500,592**	**$ 49,335,502**	**$ 3,265,299**	**$ 7,234,609**	**$ 4,578,457**	**$ 915,868**	**$ 704,258**	**$ 181,897**	**$ 6,404,013**	**$ 5,584,987**
16	**Operating Expenses**													
17	O&M Expenses	$ 802,688,016	$ 27,095,813	$104,606,904	$ 38,499,890	$ 35,222,402	$ 1,607,803	$ 4,371,989	$ 2,989,536	$ 624,996	$ 335,993	$ 88,706	$ 2,841,340	$ 3,103,733
18	Depreciation and Amortization Expense	362,792,895	11,509,285	42,162,429	14,372,793	12,224,720	766,724	1,850,460	1,196,320	232,335	167,010	59,440	1,960,333	2,044,005
19	Regulatory Debits and Credits	1,310,661	46,368	182,927	70,905	65,708	2,689	7,344	5,201	1,148	544	96	3,113	4,544
20	Taxes Other than Income	64,923,421	1,947,876	6,844,449	2,172,236	1,681,003	139,344	314,935	193,741	35,053	31,308	13,179	432,732	420,321
21	Other O&M Expenses	8,707,212	269,967	939,479	316,551	270,918	18,424	40,150	24,823	4,605	3,985	1,095	40,330	33,703
22	Total State Income Tax	9,308,205	187,461	154,861	74,306	(210,781)	24,202	2,878	(10,687)	(2,765)	5,609	71	26,192	(32,654)
23	Total Federal Income Tax	34,139,615	681,072	458,385	340,879	(802,406)	90,054	(2,689)	(48,240)	(10,570)	20,627	(1,495)	44,137	(189,866)
24	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 41,737,842**	**$155,349,434**	**$ 55,847,560**	**$ 48,451,564**	**$ 2,649,240**	**$ 6,585,067**	**$ 4,350,695**	**$ 884,801**	**$ 565,076**	**$ 161,092**	**$ 5,348,178**	**$ 5,383,786**
25	**Net Operating Income**	**$ 259,164,384**	**$ 6,607,092**	**$ 16,094,030**	**$ 5,653,032**	**$ 883,938**	**$ 616,059**	**$ 649,542**	**$ 227,762**	**$ 31,067**	**$ 139,182**	**$ 20,805**	**$ 1,055,835**	**$ 201,201**
26	**Rate of Return on Rate Base ("ROR")**	**4.78%**	**4.07%**	**2.85%**	**3.21%**	**0.66%**	**5.25%**	**2.47%**	**1.42%**	**1.09%**	**5.26%**	**1.81%**	**2.82%**	**0.54%**
27	**Relative Rate of Return ("RROR")**	**1.00**	**0.85**	**0.60**	**0.67**	**0.14**	**1.10**	**0.52**	**0.30**	**0.23**	**1.10**	**0.38**	**0.59**	**0.11**

Results of Alternative Proposed Allocated Cost of Service Study – Required Increase at Equalized Rates

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service Secondary (GS-SEC)	General Service Primary (GS-PRI)	General Service Substation (GS-SUB)	General Service Transmission (GS-TRAN)	Large General Service Secondary (LGS-SEC)	Large General Service Primary (LGS-PRI)	Large General Service Substation (LGS-SUB)	Large General Service Transmission (LGS-TRAN)
1	**Required Income Under Company's Proposed ROR**										
2	Total Rate Base	$ 5,423,706,117	$ 2,445,460,055	$ 627,248,150	$11,460,851	$ 33,901	$ 440,855	$ 1,094,100,165	$ 72,704,892	$ -	$ 75,445
3	Proposed Rate of Return	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%
4	**Required Operating Income @ 6.47% ROR**	**$ 351,025,434**	**$ 158,271,606**	**$ 40,595,867**	**$ 741,753**	**$ 2,194**	**$ 28,532**	**$ 70,810,803**	**$ 4,705,503**	**$ -**	**$ 4,883**
5	**Operating Expenses**										
6	O&M Expenses	$ 802,688,016	$ 312,189,743	$ 85,510,941	$ 1,833,405	$ 5,846	$ 103,314	$ 169,384,044	$ 12,253,225	$ -	$ 18,391
7	Depreciation and Amortization Expense	362,792,895	152,475,724	40,628,272	803,986	2,470	38,535	75,083,830	5,207,527	-	6,696
8	Regulatory Debits and Credits	1,310,661	468,957	138,736	3,211	11	200	287,527	21,398	-	35
9	Taxes Other than Income	64,923,421	29,147,246	7,460,433	137,596	413	5,511	13,069,993	875,107	-	945
10	Other O&M Expenses	8,707,212	3,784,612	1,074,728	21,913	105	1,125	1,744,908	115,581	-	210
11	Total State Income Tax	9,308,205	5,589,197	1,956,826	40,742	422	1,932	1,450,197	49,808	-	387
12	Total Federal Income Tax	34,139,615	20,487,481	7,464,244	160,292	1,706	7,998	5,262,751	173,657	-	1,598
13	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 524,142,961**	**$ 144,234,180**	**$ 3,001,146**	**$ 10,973**	**$ 158,616**	**$ 266,283,250**	**$ 18,696,302**	**$ -**	**$ 28,262**
14	**Total Revenue Requirement**	**$ 1,634,895,458**	**$ 682,414,567**	**$ 184,830,047**	**$ 3,742,899**	**$ 13,167**	**$ 187,148**	**$ 337,094,053**	**$ 23,401,805**	**$ -**	**$ 33,145**
15	**Operating Revenues**										
16	Firm Sales of Electricity	$ 1,233,024,597	$ 539,225,575	$ 153,091,563	$ 3,111,738	$ 15,158	$ 158,869	$ 246,220,545	$ 16,229,002	$ -	$ 29,757
17	Interruptible	95,716,524	33,072,889	9,789,397	226,560	741	14,024	21,031,793	1,564,601	-	2,555
18	Sales for Resale	47,581,224	16,422,770	4,861,132	112,503	368	6,962	10,455,542	777,801	-	1,270
19	Other Operating Revenues	165,093,436	69,095,181	19,249,322	425,637	1,878	20,672	34,669,972	2,541,714	-	2,754
20	Gain on Sale of Emission Allowance	1,618,627	558,662	165,364	3,827	13	237	355,679	26,459	-	43
21	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 658,375,077**	**$ 187,156,778**	**$ 3,880,265**	**$ 18,158**	**$ 200,764**	**$ 312,733,530**	**$ 21,139,577**	**$ -**	**$ 36,380**
22	**Revenue Deficiency/(Surplus)**	**$ 91,861,050**	**$ 24,039,490**	**$ (2,326,731)**	**$ (137,366)**	**$ (4,991)**	**$ (13,616)**	**$ 24,360,523**	**$ 2,262,228**	**$ -**	**$ (3,235)**
23	**Required Rate Increase (Decrease)**	**7.45%**	**4.46%**	**-1.52%**	**-4.41%**	**-32.92%**	**-8.57%**	**9.89%**	**13.94%**	**-**	**-10.87%**
24	**Relative Rate Increase**	**1.00**	**0.60**	**-0.20**	**-0.59**	**-4.42**	**-1.15**	**1.33**	**1.87**	**-**	**-1.46**

Results of Alternative Proposed Allocated Cost of Service Study – Required Increase at Equalized Rates

Line No.	Account Description	Total IM-Indiana	IP Secondary (IP-SEC)	IP Primary (IP-PRI)	IP Substation (IP-SUB)	IP Transmission (IP-TRAN)	(MS)	WSS Secondary (WSS-SEC)	WSS Primary (WSS-PRI)	WSS Substation (WSS-SUB)	(EHG)	(IS)	Outdoor Lighting (OL)	Street Lighting (SL)
1	**Required Income Under Company's Proposed ROR**													
2	Total Rate Base	$ 5,423,706,117	$ 162,321,228	$ 565,128,199	$ 175,914,537	$ 133,711,194	$11,739,472	$26,263,909	$15,993,596	$ 2,837,928	$ 2,648,163	$ 1,152,637	$37,393,409	$37,077,532
3	Proposed Rate of Return	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%	6.47%
4	**Required Operating Income @ 6.47% ROR**	**$ 351,025,434**	**$ 10,505,525**	**$ 36,575,428**	**$ 11,385,292**	**$ 8,653,867**	**$ 759,786**	**$ 1,699,816**	**$ 1,035,115**	**$ 183,672**	**$ 171,391**	**$ 74,599**	**$ 2,420,123**	**$ 2,399,680**
5	**Operating Expenses**													
6	O&M Expenses	$ 802,688,016	$ 27,095,813	$ 104,606,904	$ 38,499,890	$ 35,222,402	$ 1,607,803	$ 4,371,989	$ 2,989,536	$ 624,996	$ 335,993	$ 88,706	$ 2,841,340	$ 3,103,733
7	Depreciation and Amortization Expense	362,792,895	11,509,285	42,162,429	14,372,793	12,224,720	766,724	1,850,460	1,196,320	232,335	167,010	59,440	1,960,333	2,044,005
8	Regulatory Debits and Credits	1,310,661	46,368	182,927	70,905	65,708	2,689	7,344	5,201	1,148	544	96	3,113	4,544
9	Taxes Other than Income	64,923,421	1,947,876	6,844,449	2,172,236	1,681,003	139,344	314,935	193,741	35,053	31,308	13,179	432,732	420,321
10	Other O&M Expenses	8,707,212	269,967	939,479	316,551	270,918	18,424	40,150	24,823	4,605	3,985	1,095	40,330	33,703
11	Total State Income Tax	9,308,205	187,461	154,861	74,306	(210,781)	24,202	2,878	(10,687)	(2,765)	5,609	71	26,192	(32,654)
12	Total Federal Income Tax	34,139,615	681,072	458,385	340,879	(802,406)	90,054	(2,689)	(48,240)	(10,570)	20,627	(1,495)	44,137	(189,866)
13	**Total Operating Expenses**	**$ 1,283,870,024**	**$ 41,737,842**	**$ 155,349,434**	**$ 55,847,560**	**$ 48,451,564**	**$ 2,649,240**	**$ 6,585,067**	**$ 4,350,695**	**$ 884,801**	**$ 565,076**	**$ 161,092**	**$ 5,348,178**	**$ 5,383,786**
14	**Total Revenue Requirement**	**$ 1,634,895,458**	**$ 52,243,367**	**$ 191,924,862**	**$ 67,232,852**	**$ 57,105,431**	**$ 3,409,025**	**$ 8,284,882**	**$ 5,385,810**	**$ 1,068,473**	**$ 736,467**	**$ 235,691**	**$ 7,768,301**	**$ 7,783,466**
15	**Operating Revenues**													
16	Firm Sales of Electricity	$ 1,233,024,597	$ 38,042,002	$ 131,643,102	$ 44,099,292	$ 37,565,510	$ 2,611,543	$ 5,636,554	$ 3,462,931	$ 636,864	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
17	Interruptible	95,716,524	3,496,130	13,953,265	5,435,892	5,107,052	185,589	567,518	401,514	88,554	37,097	7,326	298,457	435,570
18	Sales for Resale	47,581,224	1,739,626	6,945,327	2,706,151	2,543,458	92,093	282,593	199,927	44,093	18,401	3,647	149,451	218,109
19	Other Operating Revenues	165,093,436	5,007,996	18,665,497	9,167,195	4,032,955	372,941	738,330	507,283	144,856	82,151	14,589	173,334	179,176
20	Gain on Sale of Emission Allowance	1,618,627	59,180	236,273	92,061	86,527	3,133	9,614	6,801	1,500	626	124	5,085	7,421
21	**Total Operating Revenues**	**$ 1,543,034,408**	**$ 48,344,933**	**$ 171,443,464**	**$ 61,500,592**	**$ 49,335,502**	**$ 3,265,299**	**$ 7,234,609**	**$ 4,578,457**	**$ 915,868**	**$ 704,258**	**$ 181,897**	**$ 6,404,013**	**$ 5,584,987**
22	**Revenue Deficiency/(Surplus)**	**$ 91,861,050**	**$ 3,898,433**	**$ 20,481,398**	**$ 5,732,260**	**$ 7,769,929**	**$ 143,726**	**$ 1,050,274**	**$ 807,353**	**$ 152,606**	**$ 32,208**	**$ 53,794**	**$ 1,364,289**	**$ 2,198,479**
23	**Required Rate Increase (Decrease)**	**7.45%**	**10.25%**	**15.56%**	**13.00%**	**20.68%**	**5.50%**	**18.63%**	**23.31%**	**23.96%**	**5.69%**	**34.44%**	**23.61%**	**46.34%**
24	**Relative Rate Increase**	**1.00**	**1.38**	**2.09**	**1.74**	**2.78**	**0.74**	**2.50**	**3.13**	**3.22**	**0.76**	**4.62**	**3.17**	**6.22**

I&M Proposed Revenue Distribution

Witness: Dismukes
Cause No. 45933
Exhibit DED-9

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service (GS)	Large General Service (LGS)	Industrial Power (IP)	Municipal and School Service (MS)	Water and Sewage Service (WSS)	Electric Heating General (EHG)	Irrigation Service (IS)	Outdoor Lighting (OL)	Street Lighting (SL)
1	**Allocated Cost of Service Study Results**											
2	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
3	Operating Income	$ 259,164,384	$ 105,183,129	$ 40,311,231	$ 52,959,562	$ 54,578,784	$ 486,601	$ 1,813,559	$ 97,119	$ 37,261	$ 2,049,783	$ 1,647,355
4	Rate Base	$ 5,423,706,117	$ 2,619,286,553	$ 650,386,610	$ 1,136,323,254	$ 897,257,932	$ 12,250,095	$ 40,671,682	$ 2,855,743	$ 1,035,199	$ 32,970,285	$ 30,668,764
5	Rate of Return	4.78%	4.02%	6.20%	4.66%	6.08%	3.97%	4.46%	3.40%	3.60%	6.22%	5.37%
6	Relative Rate of Return		0.84	1.30	0.98	1.27	0.83	0.93	0.71	0.75	1.30	1.12
7	**Proposed Revenue Increase**											
8	Proposed Rate of Return	6.47%										
9	Current Operating Revenues	$ 1,605,903,942										
10	Proposed Operating Revenue Increase	115,863,258										
11	Proposed Revenue Requirement	$ 1,721,767,200										
12	**Proposed Revenue Allocation at Full Cost of Service**											
13	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
14	Current Rider Revenue	372,879,345	151,306,714	53,983,111	79,422,806	83,693,639	810,126	3,230,293	180,757	27,053	23,064	201,782
15	Incremental Revenues at Full Cost of Service	122,836,597	86,033,616	2,383,120	27,524,849	4,669,870	409,493	1,094,814	117,280	39,766	112,424	451,365
16	Rider Revenue Change ($)	1,264,520	8,211,254	(1,188,020)	(1,700,786)	(4,190,715)	76,305	(11,201)	11,845	(13,522)	26,902	42,457
17	Percent Increase at Proposed ROR	7.73%	13.65%	0.57%	7.55%	0.14%	14.20%	8.36%	17.29%	14.32%	2.40%	9.98%
18	**Step One Increase**											
19	**Maximum Increase of 9.35 percent**	$ 65,434,148	$ 64,564,769	$ -	$ -	$ -	$ 319,926	$ -	$ 69,820	$ 17,135	$ -	$ 462,497
20	Remaining Revenue Deficiency	50,429,110										
21	**Step Two Increase**											
22	**Minimum Increase of 3.20 percent**	$ 17,638,551	$ -	$ 6,731,534	$ -	$ 10,721,393	$ -	$ -	$ -	$ -	$ 185,624	$ -
23	Remaining Revenue Deficiency	32,790,559										
24	**Step Three Increase**											
25	Defined Increase to WSS	$ 1,027,900	$ -	$ -	$ -	$ -	$ -	$ 1,027,900	$ -	$ -	$ -	$ -
26	Remaining Increase to LGS Customer Class	31,762,658	-	-	31,762,658	-	-	-	-	-	-	-
27	**Total Proposed Revenue Increase**	**$ 115,863,258**	**$ 64,564,769**	**$ 6,731,534**	**$ 31,762,658**	**$ 10,721,393**	**$ 319,926**	**$ 1,027,900**	**$ 69,820**	**$ 17,135**	**$ 185,624**	**$ 462,497**
28	**Summary**											
29	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
30	Current Rider Revenues	372,879,345	151,306,714	53,983,111	79,422,806	83,693,639	810,126	3,230,293	180,757	27,053	23,064	201,782
31	Base Rate Change ($)	114,598,737	56,353,515	7,919,554	33,463,444	14,912,108	243,621	1,039,101	57,975	30,657	158,722	420,040
32	Rider Revenue Change ($)	1,264,520	8,211,254	(1,188,020)	(1,700,786)	(4,190,715)	76,305	(11,201)	11,845	(13,522)	26,902	42,457
33	**Proposed Revenue**	**$ 1,721,767,200**	**$ 755,097,058**	**$ 217,091,972**	**$ 373,664,769**	**$ 345,764,938**	**$ 3,741,595**	**$ 13,994,543**	**$ 816,560**	**$ 200,400**	**$ 5,986,374**	**$ 5,408,991**
34	**Proposed Revenue Change (%)**	**7.21%**	**9.35%**	**3.20%**	**9.29%**	**3.20%**	**9.35%**	**7.93%**	**9.35%**	**9.35%**	**3.20%**	**9.35%**
35	**Relative Proposed Rate Increase**	**1.00**	**1.30**	**0.44**	**1.29**	**0.44**	**1.30**	**1.10**	**1.30**	**1.30**	**0.44**	**1.30**

Source: Direct Testimony of Jennifer L. Fischer, Attachment JLF-2.

Alternative Proposed Revenue Distribution

Witness: Dismukes
Cause No. 45933
Exhibit DED-10

Line No.	Account Description	Total IM-Indiana	Residential Service (RS)	General Service (GS)	Large General Service (LGS)	Industrial Power (IP)	Municipal and School Service (MS)	Water and Sewage Service (WSS)	Electric Heating General (EHG)	Irrigation Service (IS)	Outdoor Lighting (OL)	Street Lighting (SL)
1	**Allocated Cost of Service Study Results**											
2	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
3	Operating Income	$ 259,164,384	$ 134,232,116	$ 43,851,051	$ 48,901,673	$ 29,238,091	$ 616,059	$ 908,371	$ 139,182	$ 20,805	$ 1,055,835	$ 201,201
4	Rate Base	$ 5,423,706,117	$ 2,445,460,055	$ 639,183,757	$1,166,880,502	$1,037,075,158	$ 11,739,472	$ 45,095,432	$ 2,648,163	$1,152,637	$37,393,409	$37,077,532
5	Rate of Return	4.78%	5.49%	6.86%	4.19%	2.82%	5.25%	2.01%	5.26%	1.81%	2.82%	0.54%
6	Relative Rate of Return		1.15	1.44	0.88	0.59	1.10	0.42	1.10	0.38	0.59	0.11
7	**Proposed Revenue Increase**											
8	Proposed Rate of Return	6.47%										
9	Current Operating Revenues	$ 1,605,903,942										
10	Proposed Operating Revenue Increase	115,863,258										
11	Proposed Revenue Requirement	$ 1,721,767,200										
12	**Proposed Revenue Allocation at Full Cost of Service**											
13	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
14	Current Rider Revenue	372,879,345	151,306,714	53,983,111	79,422,806	83,693,639	810,126	3,230,293	180,757	27,053	23,064	201,782
15	Incremental Revenues at Full Cost of Service	122,836,600	32,145,606	(3,319,872)	35,595,616	50,655,839	192,192	2,688,083	43,070	71,933	1,824,327	2,939,806
16	Rider Revenue Change ($)	1,232,546	(3,478,039)	594,009	841,836	3,078,092	96,045	64,475	6,997	(2,574)	13,162	18,543
17	Percent Increase at Proposed ROR	7.73%	4.15%	-1.30%	10.66%	16.04%	8.42%	21.23%	6.70%	37.85%	31.68%	59.81%
18	**Step One Increase**											
19	**Maximum Increase of 8.29 percent**	$ 58,445,430	$ -	$ -	$ 28,343,685	$ 27,775,110	$ 283,656	$ 1,074,935	$ 61,905	$ 15,193	$ 480,882	$ 410,064
20	Remaining Revenue Deficiency	57,417,828										
21	**Step Two Increase**											
22	**Minimum Increase of 3.20 percent**	$ 6,731,534	$ -	$ 6,731,534	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
23	Remaining Revenue Deficiency	50,686,294										
24	**Step Three Increase**											
25	COS for Remaining Classes	$ 28,667,567	$ 28,667,567	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
26	Allocation of Remaining Revenue Deficiency	50,686,294	50,686,294	-	-	-	-	-	-	-	-	-
27	**Total Proposed Revenue Increase**	**$ 115,863,258**	**$ 50,686,294**	**$ 6,731,534**	**$ 28,343,685**	**$ 27,775,110**	**$ 283,656**	**$ 1,074,935**	**$ 61,905**	**$ 15,193**	**$ 480,882**	**$ 410,064**
28	**Summary**											
29	Current Rates	$ 1,233,024,597	$ 539,225,575	$ 156,377,327	$ 262,479,304	$ 251,349,906	$ 2,611,543	$ 9,736,349	$ 565,983	$ 156,212	$ 5,777,686	$ 4,744,712
30	Current Rider Revenues	372,879,345	151,306,714	53,983,111	79,422,806	83,693,639	810,126	3,230,293	180,757	27,053	23,064	201,782
31	Base Rate Change ($)	114,630,712	54,164,333	6,137,525	27,501,849	24,697,018	187,611	1,010,460	54,908	17,767	467,720	391,521
32	Rider Revenue Change ($)	1,232,546	(3,478,039)	594,009	841,836	3,078,092	96,045	64,475	6,997	(2,574)	13,162	18,543
33	**Proposed Revenue**	**$ 1,721,767,200**	**$ 741,218,583**	**$ 217,091,972**	**$ 370,245,795**	**$ 362,818,655**	**$ 3,705,326**	**$ 14,041,577**	**$ 808,645**	**$ 198,457**	**$ 6,281,632**	**$ 5,356,558**
34	**Proposed Revenue Change (%)**	**7.21%**	**7.34%**	**3.20%**	**8.29%**	**8.29%**	**8.29%**	**8.29%**	**8.29%**	**8.29%**	**8.29%**	**8.29%**
35	**Relative Proposed Rate Increase**	**1.00**	**1.02**	**0.44**	**1.15**	**1.15**	**1.15**	**1.15**	**1.15**	**1.15**	**1.15**	**1.15**

Comparison of Current and Proposed Customer Charges

Tariff	Current	Proposed	Increase
Residential Service (RS)	$ 14.79	$ 17.50	18.32%
General Service			
Secondary (GS-SEC)	$ 24.65	$ 29.00	17.65%
Primary (GS-PRI)	$ 177.48	$ 210.00	18.32%
Substation (GS-SUB)	$ 177.48	$ 210.00	18.32%
Transmission (GS-TRAN)	$ 177.48	$ 210.00	18.32%
Large General Service			
Secondary (LGS-SEC)	$ 24.65	$ 29.00	17.65%
Primary (LGS-PRI)	$ 177.48	$ 210.00	18.32%
Substation (LGS-SUB)	$ 177.48	$ 210.00	18.32%
Transmission (LGS-TRAN)	$ 177.48	$ 210.00	18.32%
Industrial Power			
Secondary (IP-SEC)	$ 152.83	$ 180.00	17.78%
Primary (IP-PRI)	$ 231.71	$ 275.00	18.68%
Substation (IP-SUB)	$ 231.71	$ 275.00	18.68%
Transmission (IP-TRAN)	$ 231.71	$ 275.00	18.68%
Municipal and School Service (MS)	$ 19.97	$ 24.00	20.18%
Water and Sewage Service			
Secondary (WSS-SEC)	$ 30.57	$ 36.00	17.76%
Primary (WSS-PRI)	$ 135.08	$ 160.00	18.45%
Substation (WSS-SUB)	$ 135.08	$ 160.00	18.45%
Electric Heating General (EHG)	$ 24.65	$ 29.00	17.65%

Source: Direct Testimony of Jenifer L. Fischer, Attachment JLF-4

Current Customer Charge Revenues to Costs

	Residential Service (RS)	General Service				Large General Service			
		Secondary (GS-SEC)	Primary (GS-PRI)	Substation (GS-SUB)	Transmission (GS-TRAN)	Secondary (LGS-SEC)	Primary (LGS-PRI)	Substation (LGS-SUB)	Transmission (LGS-TRAN)
Current Customer Charge	**$ 14.79**	**$ 24.65**	**$ 177.48**	**$ 177.48**	**$ 177.48**	**$ 24.65**	**$ 177.48**	**$ 177.48**	**$ 177.48**
Customer-Related Costs	$ 61,453,810	$ 9,612,352	$ 18,835	$ 849	$ 376	$ 2,032,444	$ 229,475	$ -	$ 12
Total Number of Customers	419,758	52,561	58	3	3	5,186	102	0	0
Months in Year	12	12	12	12	12	12	12	12	12
Annual Customer Bills	5,037,095	630,731	700	36	35	62,232	1,220	-	3
Monthly Customer-Related Costs	**$ 12.20**	**$ 15.24**	**$ 26.93**	**$ 23.67**	**$ 10.72**	**$ 32.66**	**$ 188.10**	**$ -**	**$ 3.95**
Current Customer Charge as Percent of Monthly Customer-Related Costs	**121.2%**	**161.7%**	**659.2%**	**749.9%**	**1655.4%**	**75.5%**	**94.4%**	**-**	**4497.8%**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1 and MSS-3; and Direct Testimony of Jenifer L. Fischer, Attachment JLF-4.

Current Customer Charge Revenues to Costs

	Industrial Power				Municipal and School Service	Water and Sewage Service			Electric Heating General
	Secondary (IP-SEC)	Primary (IP-PRI)	Substation (IP-SUB)	Transmission (IP-TRAN)	(MS)	Secondary (WSS-SEC)	Primary (WSS-PRI)	Substation (WSS-SUB)	(EHG)
Current Customer Charge	**$ 152.83**	**$ 231.71**	**$ 231.71**	**$ 231.71**	**$ 19.97**	**$ 30.57**	**$ 135.08**	**$ 135.08**	**$ 24.65**
Customer-Related Costs	$ 38,237	$232,869	$ 6,528	$ 3,970	$ 80,693	$ 115,065	$ 4,796	$ 1,566	$ 32,338
Total Number of Customers	63	127	20	12	294	426	15	6	126
Months in Year	12	12	12	12	12	12	12	12	12
Annual Customer Bills	754	1,519	240	144	3,524	5,116	181	66	1,510
Monthly Customer-Related Costs	**$ 50.73**	**$ 153.33**	**$ 27.24**	**$ 27.64**	**$ 22.90**	**$ 22.49**	**$ 26.56**	**$ 23.64**	**$ 21.41**
Current Customer Charge as Percent of Monthly Customer-Related Costs	**301.3%**	**151.1%**	**850.8%**	**838.4%**	**87.2%**	**135.9%**	**508.6%**	**571.3%**	**115.1%**

Source: Direct Testimony of Michael S. Small, Attachment MSS-1 and MSS-3; and Direct Testimony of Jenifer L. Fischer, Attachment JLF-4.

Survey of Regional Customer Charges

Witness: Dismukes
Cause No. 45933
Exhibit DED-13

Company	State	Residential Customer Charge ($/month)	Small Commercial Customer Charge ($/month)
Indiana Michigan Power Co (Current)	**IN**	**$ 14.79**	**$ 24.65**
Indiana Michigan Power Co (Proposed)	**IN**	**$ 17.50**	**$ 29.00**
Ameren Illinois Company	IL	$ 5.57	$ 15.43
Cleveland Electric Illum Co	OH	$ 4.00	$ 7.00
Consumers Energy Co	MI	$ 8.00	$ 20.00
Dayton Power & Light Co	OH	$ 7.00	$ 16.68
DTE Electric Company	MI	$ 8.50	$ 11.25
Duke Energy Indiana, LLC	IN	$ 10.54	$ 10.70
Duke Energy Kentucky	KY	$ 12.60	$ 15.00
Duke Energy Ohio Inc	OH	$ 8.00	$ 23.00
Indianapolis Power & Light Co	IN	$ 16.75	$ 39.40
Indiana Michigan Power Co	MI	$ 7.25	$ 17.65
Kentucky Power Co	KY	$ 17.50	$ 25.00
Kentucky Utilities Co	KY	$ 16.12	$ 41.06
Louisville Gas & Electric Co	KY	$ 13.69	$ 35.28
Northern Indiana Pub Serv Co	IN	$ 14.00	$ 32.50
Ohio Edison Co	OH	$ 4.00	$ 7.00
Ohio Power Co	OH	$ 10.00	$ 9.40
Southern Indiana Gas & Elec Co	IN	$ 10.84	$ 10.84
The Toledo Edison Co	OH	$ 4.00	$ 7.00
Peer Group Average		**$ 9.91**	**$ 19.12**

Notes: All daily rates have been pro-rated to reflect a monthly charge.
For Cleveland Electric Illum Co. the Commercial charge is from the General Service Secondary (GS) tariff.
For Indiana Michigan Power Co. in Michigan, the Commercial charge represents the GS tariff for customers with a demand meter.

Source: Companies' tariffs.

Comparison of I&M and Alternative Recommended ECR, OSS_PJM, and SPR Rates

Witness: Dismukes
Cause No. 45933
Exhibit DED-14

	Company Proposed (From JLF-6)						Alterantive Recommended					
	ECR		OSS_PJM		SPR		ECR		OSS_PJM		SPR	
Tariff Class	($/kWh)	($/kW)	($/kWh)	($/kW)	($/kWh)	($/kW)	($/kWh)	($/kW)	($/kWh)	($/kW)	($/kWh)	($/kW)
Residential Service (RS)	$0.001814		$ 0.033597		$ 0.000239		$0.001692		$ 0.030975		$ 0.000217	
General Service (GS) - up to 4,500 kWh	$0.001509		$ 0.027063		$ 0.000188		$0.001554		$ 0.028045		$ 0.000196	
General Service (GS) - over 4,500 kWh	$0.000233	$0.393	$(0.000426)	$8.475	$(0.000039)	$0.069	$0.000233	$0.407	$(0.000426)	$ 8.778	$(0.000039)	$0.071
Large General Service (LGS)	$0.000233	$0.393	$(0.000426)	$8.475	$(0.000039)	$0.069	$0.000233	$0.407	$(0.000426)	$ 8.778	$(0.000039)	$0.071
Large General Service (LGS) - Time of Day	$0.001509		$ 0.027063		$ 0.000188		$0.001554		$ 0.028045		$ 0.000196	
Industrial Power (IP)	$0.000233	$0.461	$(0.000426)	$9.930	$(0.000039)	$0.081	$0.000233	$0.500	$(0.000426)	$10.767	$(0.000039)	$0.088
Municipal and School Service (MS)	$0.001771		$ 0.032713		$ 0.000231		$0.001808		$ 0.033502		$ 0.000238	
Water and Sewage Service (WSS)	$0.001185		$ 0.020075		$ 0.000129		$0.001209		$ 0.020595		$ 0.000134	
Irrigation Service (IS)	$0.000766		$ 0.011103		$ 0.000048		$0.001280		$ 0.022174		$ 0.000138	
Electric Heating General (EHG)	$0.000233	$0.288	$(0.000426)	$6.205	$(0.000039)	$0.051	$0.000233	$0.280	$(0.000426)	$ 6.040	$(0.000039)	$0.049
Outdoor Lighting (OL)	$0.000300		$ 0.001027		$(0.000025)		$0.000285		$ 0.000687		$(0.000028)	
Street Lighting (SL)	$0.000296		$ 0.001114		$(0.000026)		$0.000277		$ 0.000709		$(0.000029)	

Source: Company's Responses to OUCC 6-08; and Direct Testimony of Jenifer L. Fischer, WP-JLF-2 and WP-JLF-6.

Comparison of I&M and Alternative Recommended TDISC Rates

Witness: Dismukes
Cause No. 45933
Exhibit DED-15

Rate Tariff	Company Proposed Allocation (JLF-6)		Alternative Recommended Allocation	
	Distribution	Transmission	Distribution	Transmission
Residential (RS)	47.277%	44.195%	47.021%	44.031%
OL Total (090 - 120)	0.471%	0.441%	0.495%	0.463%
GS Secondary	12.769%	11.936%	12.618%	11.816%
GS Primary	0.260%	0.243%	0.247%	0.231%
GS Subtransmission	0.000%	0.001%	0.000%	0.001%
GS Transmission	0.000%	0.012%	0.000%	0.012%
LGS Secondary	22.044%	20.607%	21.492%	20.126%
LGS Primary	1.445%	1.351%	1.483%	1.388%
LGS Transmission	0.000%	0.003%	0.000%	0.003%
IP Secondary	3.164%	2.958%	3.311%	3.101%
IP Primary	11.066%	10.345%	11.848%	11.095%
IP Subtransmission	0.000%	3.479%	0.000%	3.356%
IP Transmission	0.000%	2.976%	0.000%	2.932%
SL	0.410%	0.383%	0.407%	0.381%
WSS Secondary	0.497%	0.465%	0.483%	0.452%
WSS Primary	0.306%	0.286%	0.311%	0.291%
WSS Subtransmission	0.000%	0.048%	0.000%	0.054%
IS	0.015%	0.014%	0.014%	0.013%
EHG	0.050%	0.046%	0.049%	0.046%
MS	0.227%	0.212%	0.222%	0.208%
Total	100.0%	100.0%	100.0%	100.0%

Source: Direct Testimony of Jenifer L. Fischer, WP-JLF-6.

I&M Proposed Changes to Service Charges

Witness: Dismukes
Cause No. 45933
Exhibit DED-16

Service Charge	Current Charge	Proposed Charge	Percent Increase	2022 Frequency	2022 Revenues	Proposed Increase	Percent Increase
AMI Opt-out Customer -- Reconnection during Regular Hours	$ 83	$ 100	20.5%	1	$ 83	$ 17	20.5%
AMI Opt-out Customer -- Reconnection after Hours or Saturday	93	131	40.9%	0	-	-	-
AMI Opt-out Customer -- Sunday or Holiday Reconnection	177	267	50.8%	0	-	-	-
AMI Opt-out Customer -- Trip to Leave Notice	41	39	-4.9%	0	-	-	-
Customer Reconnection -- Vault or Manhole	1,341	1,891	41.0%	0	-	-	-
Customer Reconnection -- Regular Hours at Pole	119	162	36.1%	1,413	168,147	60,759	36.1%
Customer Reconnection -- After Hours or Saturday	132	217	64.4%	29	3,828	2,465	64.4%
Customer Reconnection -- Sunday or Holidays	245	429	75.1%	6	1,470	1,104	75.1%
No Power Service Call -- Customer Fault	41	86	109.8%	916	37,556	41,220	109.8%
Meter Test Charge	84	100	19.0%	0	-	-	-
Non-Sufficient Funds Charge	20	20	0.0%	10,613	212,260	-	0.0%
Total Revenue Increase					**$ 423,344**	**$105,565**	**24.9%**

Source: Direct Testimony of Jenifer L. Fischer, WP-JLF-6.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.

David E. Dismukes
Acadian Consulting Group ("ACG") for
Indiana Office of Utility Consumer Counselor

Cause No. 45933
Indiana Michigan Power Company

November 15, 2023
Date

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing ***Indiana Office of Utility Consumer Counselor Public's Exhibit No. 10 Testimony of OUCC Witness David E. Dismukes*** has been served upon the following counsel of record in the captioned proceeding by electronic service on November 15, 2023.

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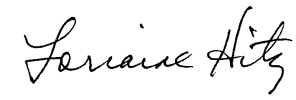

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