

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)	
SERVICE COMPANY LLC PURSUANT TO IND.)	
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)	
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)	
RATES AND CHARGES FOR ELECTRIC UTILITY)	
SERVICE THROUGH A PHASE IN OF RATES; (2))	CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)	
AND CHARGES, GENERAL RULES AND)	
REGULATIONS, AND RIDERS; (3) APPROVAL)	
OF REVISED COMMON AND ELECTRIC)	
DEPRECIATION RATES APPLICABLE TO ITS)	
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)	
OF NECESSARY AND APPROPRIATE)	
ACCOUNTING RELIEF; AND (5) APPROVAL OF)	
A NEW SERVICE STRUCTURE FOR)	
INDUSTRIAL RATES.)	

WALMART INC.'S
NOTICE OF SUBSTITUTION OF WITNESS

Walmart Inc. ("Walmart"), by counsel, hereby provides notice that it is substituting Steve W. Chriss as its witness in this cause in place of Gregory W. Tillman. Mr. Chriss is adopting the Direct Testimony and Exhibits that were prefiled by Walmart on behalf of Mr. Tillman.

In the interest of administrative convenience, attached hereto are: (1) a redline version of Mr. Chriss's Direct Testimony and Exhibits reflecting changes specific to witness identification from the previously prefiled version of Mr. Tillman's Direct Testimony and Exhibits; and (2) a clean copy of Mr. Chriss's Direct Testimony and Exhibits. There are no substantive revisions to the testimony or case-in-chief previously submitted by Walmart on behalf of Mr. Tillman.

Walmart will offer as evidence the clean version of Mr. Chriss's Direct Testimony and Exhibits at the evidentiary hearing.

Respectfully submitted,

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Dated: June 11, 2019

CERTIFICATE OF SERVICE

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Cause No. 45159

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VERIFIED DIRECT TESTIMONY AND EXHIBITS OF

~~GREGORY W. TILLMAN~~ STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Filed: ~~February 13, 2019~~ June 11, 2019

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Exhibits

- Exhibit [GWTSWC-1](#) – Witness Qualifications Statement
- Exhibit [GWTSWC-2](#) – Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE Increase
- Exhibit [GWTSWC-3](#) – Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present
- Exhibit [GWTSWC-4](#) – Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE vs 9.69%
- Exhibit [GWTSWC-5](#) – Comparison of Off-Peak Service Characteristics - 2015 Rate Case to Current Case
- Exhibit [GWTSWC-6](#) – Summary of Rate 726/826 Class Load Profile Data – 2015 Rate Case and Current Case
- Exhibit [GWTSWC-7](#) – Walmart Estimated Billing Quantities
- Exhibit [GWTSWC-8](#) – Calculation of Company and Walmart Current Rate Revenue
- Exhibit [GWTSWC-9](#) – Calculation of Company and Walmart Rate Design
- Exhibit [GWTSWC-10](#) – Calculation of Company and Walmart Proposed Rate Revenues
- Exhibit [GWTSWC-11](#) – Northern Indiana Public Service Company LLC's Response to Walmart Inc.'s Set No. 1, Walmart Data Request 1-011

1 **Introduction**

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

3 A. My name is ~~Gregory W. Tillman~~ Steve W. Chriss. My business address is 2001 SE
4 10th St., Bentonville, AR 72716-5530. I am employed by Walmart Inc. as ~~Senior~~
5 ~~Manager, Energy Regulatory Analysis~~ Director, Energy Services.

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

7 A. I am testifying on behalf of Walmart Inc. ("Walmart").

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

9 A. ~~I earned a Bachelor of Science in Electrical Engineering from the University of Tulsa~~
10 ~~in 1987. Prior to joining Walmart in 2015, I had over 22 years of experience in the~~
11 ~~regulated and deregulated energy industry including roles in regulatory, pricing,~~
12 ~~billing, and metering information. In 1990, after serving on active duty as a Signal~~
13 ~~Officer in the United States Army, I joined Public Service Company of Oklahoma~~
14 ~~("PSO"). From 1990 through 1997, I was employed in various positions at PSO,~~
15 ~~including in the Information Services, Business Planning, Rates and Regulatory, and~~
16 ~~Ventures departments. During my tenure with the Rates and Regulatory~~
17 ~~Department, I served as the Supervisor of Power Billing and Data Collection. In this~~
18 ~~position, I managed the billing for large industrial and commercial customers and led~~
19 ~~the implementation of PSO's real-time pricing program. I also managed the~~
20 ~~implementation of real-time pricing for the three remaining utilities in the Central~~

1 ~~and South West Corporation — Southwestern Electric Power Company, Central~~
2 ~~Power and Light, and West Texas Utilities. In 1997, I joined the Retail Energy~~
3 ~~Department of the Williams Energy Company as the Manager of Systems for the~~
4 ~~retail gas and electric data and billing. I also managed the customer billing function~~
5 ~~at Williams Thermogas as well as the billing and accounting systems support~~
6 ~~functions at Williams Communications. From 2000 to 2002, I served as the Vice~~
7 ~~President of Energy Solutions for Automated Energy. In 2008, following several~~
8 ~~assignments as a consultant and project manager in various industries, I joined~~
9 ~~Oklahoma Gas & Electric Company ("OG&E") as a Senior Pricing Analyst. I was~~
10 ~~promoted to Manager of Pricing in January 2010 and became the Product~~
11 ~~Development Pricing Leader in 2013. While at OG&E, I was instrumental in~~
12 ~~developing and managing OG&E's pricing strategy and products, including the design~~
13 ~~and implementation of OG&E's SmartHours™ rate. I have been in my current~~
14 ~~position with Walmart since November 2015. In 2001, I completed a Master of~~
15 ~~Science in Agricultural Economics at Louisiana State University. From 2001 to 2003, I~~
16 ~~was an Analyst and later a Senior Analyst at the Houston office of Econ One~~
17 ~~Research, Inc., a Los Angeles-based consulting firm. My duties included research~~
18 ~~and analysis on domestic and international energy and regulatory issues. From 2003~~
19 ~~to 2007, I was an Economist and later a Senior Utility Analyst at the Public Utility~~
20 ~~Commission of Oregon in Salem, Oregon. My duties included appearing as a witness~~

1 [for PUC Staff in electric, natural gas, and telecommunications dockets. I joined the](#)
2 [energy department at Walmart in July 2007 as Manager, State Rate Proceedings. I](#)
3 [was promoted to Senior Manager, Energy Regulatory Analysis, in June 2011. I was](#)
4 [promoted to my current position in October 2016, and the position was re-titled in](#)
5 [October 2018.](#) My Witness Qualification^s Statement is included herein as Exhibit
6 ~~GWTSWC~~-1.

7 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE INDIANA UTILITY**
8 **REGULATORY COMMISSION ("IURC" OR "COMMISSION")?**

9 A. Yes. I submitted testimony in Cause Nos. ~~44967, 45029, and 45145~~[43374, 43580,](#)
10 [44688.](#)

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

13 A. Yes. ~~I have testified in 34 other proceedings before the Arizona Corporation~~
14 ~~Commission, the Arkansas Public Service Commission, the Connecticut Public~~
15 ~~Utilities Regulatory Authority, the Iowa Utilities Board, the Kentucky Public Service~~
16 ~~Commission, the Michigan Public Service Commission, the Public Utility Commission~~
17 ~~of Nevada, the New Jersey Board of Public Utilities, the Oklahoma Corporation~~
18 ~~Commission, the Pennsylvania Public Utility Commission, the Rhode Island Public~~
19 ~~Utilities Commission, the South Carolina Public Service Commission, The Public~~
20 ~~Utilities Commission of Texas, the Commonwealth of Virginia State Corporation~~

1 ~~Commission, the Public Service Commission of West Virginia, and the Wisconsin~~
2 ~~Public Service Commission. My testimony addressed the topics of revenue~~
3 ~~requirement, rate design, revenue allocation, pricing, customer impacts, tariffs, and~~
4 ~~terms and conditions of service.~~ I have submitted testimony in over 190 proceedings
5 before 38 other utility regulatory commissions. I have also submitted testimony
6 before several Missouri and Kansas House and Senate Committees. My testimony
7 has addressed topics including, but not limited to, cost of service and rate design,
8 return on equity ("ROE"), revenue requirements, ratemaking policy, large customer
9 renewable programs, qualifying facility rates, telecommunications deregulation,
10 resource certification, energy efficiency/demand side management, fuel cost
11 adjustment mechanisms, decoupling, and the collection of cash earnings on
12 construction work in progress. See Exhibit ~~GWT~~SWC-1.

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

14 A. The purpose of my testimony is to respond to issues related to the Northern Indiana
15 Public Service Company ("NIPSCO" or "Company") rate case filing.

16 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

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

18 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN INDIANA.**

19 A. As shown on Walmart's website, there are 128 retail units and 10 distribution
20 centers in Indiana employing 41,789 associates. During fiscal year ending January

1 2018, Walmart spent \$1.2 billion with 933 Indiana suppliers supporting an additional
2 42,530 jobs.¹

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

5 A. Walmart has 14 retail units and related facilities that take electric service from
6 NIPSCO. Primarily, Walmart takes service under the Company's Off-Peak Service
7 ("OPS") Rate.

8

9 ***Summary of Recommendations***

10 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE COMMISSION.**

11 A. My recommendations to the Commission are as follows:

12 1) The Commission should thoroughly and carefully consider the financial impact of
13 a rate increase on customers, paying particular attention to the Company's
14 requested revenue requirement and Return on Equity ("ROE"). Such
15 consideration ensures that any increase in the Company's rates reflects the
16 minimum amount necessary to compensate the Company for adequate and

¹ <https://corporate.walmart.com/our-story/our-locations#/united-states/indiana>

1 reliable service, while also providing NIPSCO an opportunity to earn a reasonable
2 return.

3 2) The Commission should closely examine the Company's proposed revenue
4 requirement increase and the associated ROE, especially when viewed in light of:
5 (1) the customer impact of the resulting revenue requirement increase as
6 discussed above; (2) the use of a forecast test year; and, (3) recent rate case
7 ROEs approved by commissions nationwide.

8 3) The Commission should reject NIPSCO's proposed Cost of Service Study ("COSS")
9 because it contains errors that lead to rates that are not just and reasonable.
10 The proposed COSS reflects energy consumption and billing demand
11 determinant data that is not aligned with the class load profile for the OPS class
12 and possibly other classes. The errors in the OPS class affect the COSS results
13 and rates for all classes. Only through an accurate, verified COSS can the
14 Commission establish just and reasonable rates for all customers served by
15 NIPSCO.

16 4) The Commission must ensure that any policy established through its order in this
17 case is based on accurate and complete evidence. Failure to fully understand
18 the impact of these structural changes while establishing a significant policy does
19 not balance the interests of the utility with the interests of all its customers.
20 Additionally, in the context of this rate case, the Commission must also consider

1 the balance of interests between the Company's five largest industrial customers
2 and the remaining customers.

3 5) The Commission should allocate the authorized revenue increase in a manner
4 that targets and reduces the subsidy burden for all subsidizing classes.
5 Generally, this can be done by ordering an increase to subsidizing classes that is
6 lower than the system average increase coupled with an increase to subsidized
7 classes that is above the system average without causing an unduly burdensome
8 rate increase on any class.

9 6) For the purposes of this docket and assuming accurate billing determinants are
10 used to set prices, Walmart does not oppose the Company's approach to rate
11 design for the OPS class. Again, Walmart reserves its right to address the rate
12 design further when our concerns with the COSS are addressed.

13 7) The Commission should reject Rate 831 because it results in: (1) an unjust shift in
14 cost responsibility from the Company's five largest industrial customers to the
15 remaining customers; (2) the establishment of customer access to the wholesale
16 market which fails to properly assign transition costs to the departing load; and,
17 (3) eligibility requirements that appear to be unduly discriminatory.

18 8) If the Commission determines that immediate action is required to address the
19 concerns expressed by the Company regarding further reduction in firm loads by
20 industrial customers, the Commission should establish a solution, such as that

1 outlined in my testimony, that addresses the immediate concerns while
2 addressing the proposed burden on the remaining customers during the
3 transition to a more permanent solution.

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

6 A. No. The fact that an issue is not addressed herein or in related filings should not be
7 construed as an endorsement of any filed position.

8 ***NIPSCO Proposed Revenue Increase***

9 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ELECTRIC**
10 **REVENUE REQUIREMENT INCREASE?**

11 A. My understanding is that NIPSCO has requested a gross revenue increase from base
12 rates of approximately \$111.4 million. See Direct Testimony of Jennifer Shikany,
13 p. 89, line 16.

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

17 A. Yes. The Commission should balance the interests of the Company with the
18 interests of its customers. To that end, the Commission should thoroughly and
19 carefully consider the financial impact of a rate increase on customers, paying
20 particular attention to the Company's requested revenue requirement and ROE.

1 Such consideration ensures that any increase in the Company's rates reflects the
2 minimum amount necessary to compensate the Company for adequate and reliable
3 service, while also providing NIPSCO an opportunity to earn a reasonable return.

4 ***Return on Equity***

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

6 A. NIPSCO is proposing a ROE of 10.80 percent, based on a range of 10.55 percent to
7 11.05 percent. See Direct Testimony of Vincent V. Rea, p. 5, lines 10-11. This is a
8 proposed increase in the Company's ROE of 82.5 basis points above the currently
9 authorized ROE of 9.975 percent. See Direct Testimony of Michael Hooper, p. 10,
10 line 11.

11 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT OF THE COMPANY'S PROPOSED**
12 **INCREASE IN ROE?**

13 A. The revenue requirement increase due to the proposed 82.5 basis point increase to
14 the authorized ROE is \$22.1 million, or 19.9 percent of the requested base rate
15 revenue increase. See Exhibit ~~GWT~~SWC-2.

16 **Q. ARE YOU CONCERNED THAT THE COMPANY'S PROPOSED ROE IS EXCESSIVE?**

17 A. Yes. I am concerned that the Company's proposed ROE is excessive, especially in
18 light of: (1) the customer impact of the resulting revenue requirement increase as
19 discussed above; (2) the use of a forecast test year; and, (3) recent rate case ROEs
20 approved by commissions nationwide.

1 **Q. GENERALLY, DOES THE USE OF A FORECAST TEST YEAR DECREASE THE COMPANY'S**
2 **BUSINESS RISK?**

3 A. Yes. The use of a forecast test year allows the Company to include the most current
4 information in the rates being charged to customers at the time those rates will be
5 in effect, which reduces the Company's exposure to regulatory lag in cost recovery
6 when compared to the use of a historical test year in setting rates.

7 **National Utility Industry ROE Trends**

8 **Q. IS THE COMPANY'S PROPOSED ROE HIGHER THAN ROES APPROVED BY OTHER**
9 **UTILITY REGULATORY COMMISSIONS?**

10 A. Yes. The ROE proposed by the Company is higher than the average ROE approved by
11 other utility regulatory commissions nationwide in 2016, 2017, 2018, and thus far in
12 2019. See Exhibit ~~GWT~~SWC-3.

13 **Q. WHAT IS YOUR UNDERSTANDING OF THE ROES AWARDED IN RECENT RATE CASES?**

14 A. According to data from SNL Financial², a financial news and reporting company,
15 there have been 111 reported electric utility rate case ROEs authorized by state
16 regulatory commissions for investor-owned electric utilities in 2016, 2017, 2018, and
17 thus far in 2019. *Id.* The average of the reported ROEs in those cases is 9.61

² Regulatory Research Associates is part of SNL Financial.

1 percent. The range of reported authorized ROEs for the same period is 8.40 percent
2 to 11.95 percent, and the median authorized ROE is 9.60 percent. *Id.*

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

7 A. In the group reported by SNL Financial, the average ROE for vertically integrated
8 utilities authorized from 2016 through present is 9.76 percent. Authorized ROEs for
9 vertically integrated utilities over this time period have been relatively stable. *Id.*

10 **Q. PLEASE EXPLAIN.**

11 A. The average ROE authorized for vertically integrated utilities in 2016 was 9.77
12 percent; in 2017 it was 9.80 percent; and since the beginning of 2018 it is 9.69
13 percent. *Id.* As such, the Company's proposed midpoint of 10.80 percent ROE is
14 counter to broader electric industry trends. As shown in Figure 1, the Company's
15 proposed ROE of 10.80 percent would be higher than all ROEs authorized in the U.S.
16 since the beginning of 2016 except the 11.95 percent awarded by the Regulatory
17 Commission of Alaska in 2017.

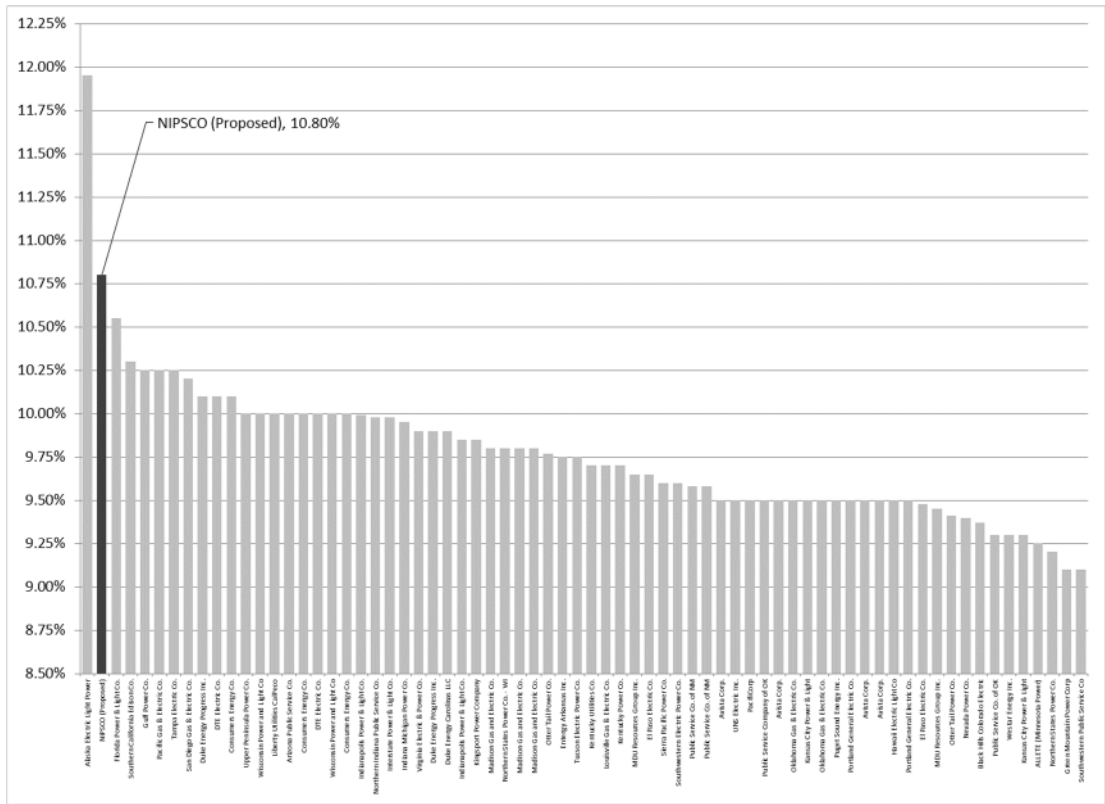


Figure 1. NIPSCO Proposed ROE Versus Authorized ROEs for Vertically Integrated Utilities, 2016 through Present. Source: Exhibit GWF-SWC-3.

1 Q. IS WALMART RECOMMENDING THAT THE COMMISSION BE BOUND BY ROES
 2 AUTHORIZED BY OTHER STATE REGULATORY AGENCIES?

3 A. No. Decisions of other state regulatory commissions are not binding on the
 4 Commission. Additionally, each commission considers the specific circumstances in
 5 each case in its determination of the proper ROE. Walmart is providing this
 6 information to illustrate a nationwide electric utility customer's perspective on
 7 industry trends in authorized ROE. In addition to using recent authorized ROEs as a
 8 general gauge of reasonableness for the various cost of equity analyses presented in

1 this case, the Commission should consider how an ROE authorized in this case
2 impacts customers relative to other jurisdictions.

3 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT IF THE COMMISSION WERE TO**
4 **AWARD AN ROE OF 9.69 PERCENT, THE AVERAGE ROE AWARDED FOR VERTICALLY**
5 **INTEGRATED UTILITIES SINCE THE BEGINNING OF 2018?**

6 A. Authorizing the Company an ROE of 9.69 percent instead of the requested 10.80
7 percent on the original cost rate base would result in a reduction to the requested
8 base revenue requirement increase, inclusive of taxes, of about \$29.3 million. This
9 represents 26.3 percent of the Company's requested base revenue requirement
10 increase. See Exhibit ~~GWT~~SWC-4.

11 **Conclusion**

12 **Q. GENERALLY, WHAT IS YOUR RECOMMENDATION TO THE COMMISSION**
13 **REGARDING THE COMPANY'S PROPOSED REVENUE REQUIREMENT INCREASE AND**
14 **THE ASSOCIATED ROE?**

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

1 ***Cost of Service***

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

4 A. Walmart advocates that rates be set by regulatory agencies based on the utility's
5 cost of service for each rate class. A regulatory policy that supports the fair-cost-
6 apportionment objective of rate-making ensures that rates reflect cost causation,
7 which sends proper price signals to customers and minimizes price distortions.

8 **Q. HOW IS COST CAUSATION DETERMINED IN THE RATE-MAKING PROCESS?**

9 A. In cost of service regulation, the Commission must determine the revenue
10 requirement that the Company is authorized to recover based on prudent costs
11 including a reasonable return on the investment required to provide service. The
12 utility's COSS is an analytic tool commonly used to determine the total cost and
13 equitable assignment of cost responsibility to customers. This is accomplished by
14 identifying, functionalizing, classifying, and allocating the approved costs to
15 customer classes in the manner that customers cause those costs to be incurred.

16 **Q. DOES WALMART HAVE SERIOUS CONCERNS WITH THE UTILITY'S PROPOSED COSS?**

17 A. Yes. Walmart is extremely concerned with the Company's COSS. Based on our
18 analysis of the proposed COSS for the OPS class, Walmart is concerned with the
19 accuracy of the proposed COSS in assigning the overall costs to the customer classes
20 and establishing the cost-basis for the proposed rates. Specifically, Walmart became

1 concerned with certain changes in the characteristics of the OPS class in comparison
2 to Company's COSS filed in Cause No. 44688, NIPSCO's most recent rate case filed in
3 2015 ("2015 Rate Case"). These concerns led to the identification of discrepancies
4 between the OPS class's load characteristics and billing determinants used in the
5 Company's COSS.

6 **Off-Peak Service Customer Characteristics**

7 **Q. ACCORDING TO THE COSS, HOW HAVE THE AVERAGE LOAD CHARACTERISTICS OF**
8 **CUSTOMERS IN THE OFF-PEAK SERVICE CLASS CHANGED SINCE THE 2015 RATE**
9 **CASE?**

10 A. The customer and demand data within the cost of service studies indicate that the
11 average customer's contribution to certain allocators show dramatic changes
12 between the 2015 Rate Case and this case. See Exhibit ~~GWT~~SWC-5.

- 13 • The Customer allocator shows an increase in the class customer count
14 from 143 customers to 184 customers.
- 15 • The 4 Coincident Peak ("4CP") allocator used to allocate generation
16 demand costs shows that the average customer contribution to the
17 4CP increased from 846 kW in the 2015 Rate Case to 999 kW in the
18 2018 case — an 18 percent increase.
- 19 • The Non-coincident Peak ("NCP") allocator shows that the average
20 customer contribution to the class NCP has increased from 838 kW to
21 1,039 kW since the 2015 Rate Case — a 24 percent increase.
- 22 • In stark contrast to the 4CP and NCP **increases** in the demand
23 allocators described above, the COSS shows a **decrease** in the average
24 allocators described above, the COSS shows a **decrease** in the average
25 allocators described above, the COSS shows a **decrease** in the average
26 allocators described above, the COSS shows a **decrease** in the average

1 billing demand contribution from 10,786 kW to 10,070 kW annually
2 — a 7 percent decrease.

- 3
4 • There is a similar decrease in the average energy sales per customer.
5 The kWh consumption decreased from 6.1 million kWh to 5.7 million
6 kWh per customer — a 7 percent decrease.

7 **Q. WERE THESE CHANGES IN THE OFF-PEAK SERVICE CLASS CHARACTERISTICS**
8 **ADDRESSED IN THE COMPANY'S DIRECT TESTIMONY?**

9 A. To my knowledge, the Company did not address the nature or source of these
10 changes in Direct Testimony.

11 **Q. WHAT CAUSED THE MOST CONCERN WITH THE VALIDITY OF THE COSS?**

12 A. The substantial directional difference in the average customer NCP between the
13 2015 Rate Case and this case compared to the difference in the average demand
14 billing determinants between cases.

15 **Q. WHY DO YOU CONSIDER THE DIRECTIONAL DIFFERENCE IN NCP AND DEMAND**
16 **BILLING DETERMINANTS A STRONG INDICATOR OF INVALID COSS RESULTS?**

17 A. Quite frankly, there is a very low probability that the average customer contribution
18 to the class NCP can **increase** by 24 percent while at the same time the kW billing
19 demand determinants can **decrease** by 7 percent. My experience, as well as basic
20 logic, indicates that if the average customer contribution to NCP increases, then the
21 highly correlated individual customer billing demands would also increase. In fact,
22 while in theory it may be possible for a directional difference of limited magnitude
23 to occur, in my experience, I have never seen such a contemporaneous unrelated

1 change in NCP and billing demand determinants such as that represented in the
2 Company's COSS.

3 **Q. DID YOU REQUEST FURTHER INSIGHT INTO THESE DIFFERENCES?**

4 A. Yes. In the Company's response to Walmart Data Requests, NIPSCO provided data
5 that allowed further insight into the development of the CP, NCP, and billing
6 determinants used in the Company's COSS. Namely, the Company provided load
7 profile data for the OPS class as well as actual billing information for customers
8 within the class.

9 **Q. BASED ON YOUR REVIEW OF THE OFF-PEAK SERVICE CLASS DATA PROVIDED BY**
10 **THE COMPANY, IS WALMART CONCERNED WITH THE CUSTOMER COUNT, CP, AND**
11 **NCP VALUES FOR THE OFF-PEAK SERVICE CLASS USED IN THE COMPANY'S COST OF**
12 **SERVICE?**

13 A. No. Walmart is not concerned with the customer count, CP, and NCP values used in
14 the Company's COSS for the OPS class. My review of the data led me to conclude
15 that the load profile, thus the CP and NCP values represented by the load profile, is
16 reasonable.³ The customer counts used in the COSS are also supported by customer

³ While the CP and NCP data did not match exactly between the COSS and the data request response, it is understood that minor differences were to be expected, based on the Company's response.

1 billing information provided by the Company in response to Walmart Data Requests
2 1-001, 1-002, 1-003, 1-004, and 1-005.

3 **Q. ARE THE BILLING DETERMINANTS USED IN THE COSS AND RATE DESIGN FOR THE**
4 **OFF-PEAK SERVICE CLASS CONSISTENT WITH THE CLASS'S LOAD PROFILE PROVIDED**
5 **BY NIPSCO?**

6 A. No. The Load Profile Data provided by the Company shows the OPS class kWh sales
7 and kW billing demands used in the COSS and rate design are not aligned with the
8 class's load profile used in the COSS.

9 **Q. PLEASE EXPLAIN.**

10 A. My analysis of the OPS class's load profile showed the class's total kWh consumption
11 represented in the load profile is 1,239,103,603 kWh. See Exhibit ~~GWT~~SWC-6. The
12 value used in the COSS for kWh sales is 1,042,183,440 kWh. See Direct Testimony of
13 J. Stephen Gaske, Attachment 18-E (Revised), p. 3. The kWh sales in the COSS
14 represents an understatement of class kWh sales of about 197 million kWh when
15 compared to the load profile — a shortfall of nearly 17 percent. Further, load
16 diversity⁴ requires the sum of the 12 monthly NCPs to be less than or equal to the

⁴ Load Diversity describes the relationship of the maximum aggregate demand of the system (class NCP) and the sum of the individual demands (customer maximum demand) for the customer loads included in the class or system. A Load Diversity factor greater than 1 indicates that the maximum demands for the customers do

1 annual kW demand billing determinants; however, the sum of the 12 monthly NCPs
2 in the Company's provided class load profile is 1,921,855 kW. See Exhibit ~~GWT~~SWC-
3 6. This is nearly 70,000 kW greater than the Company's reported billing demand
4 determinant quantity of 1,852,987 kW. See Exhibit ~~GWT~~SWC-5.

5 **Q. ARE YOU CONCERNED WITH THESE SIGNIFICANT DIFFERENCES IN THE CLASS LOAD**
6 **PROFILE AND THE ENERGY AND DEMAND BILLING QUANTITIES USED FOR THE OFF-**
7 **PEAK SERVICE CLASS?**

8 A. Yes. With respect to the COSS, the class load profiles are the foundation for
9 understanding each class's contribution to the utility's operations. The class load
10 profiles are the basic building blocks of a fair allocation of system costs to the
11 various classes. Matching of the load profile, which guides how costs are
12 apportioned to customers, to the kW and kWh billing quantities, which in turn drive
13 how revenue is collected from customers, is a fundamental requirement for
14 establishing just and reasonable rates. While slight differences may exist,
15 differences of this magnitude lead to significant errors in class cost allocation and
16 revenue recovery.

not occur at the same time. If all customers' maximum demand (*i.e.*, billing demand) occurs simultaneously then the Load Diversity factor equals 1 and the class NCP is necessarily equal to the sum of the customers' maximum demands. A Load Diversity factor cannot be less than 1.

1 Q. HOW DO UNDERSTATED KWH AND KW BILLING DETERMINANTS IMPACT THE COSS
2 AND RATE DESIGN?

3 A. The understated kWh and kW billing quantities lead to:

4 1) Failure of allocators that rely on these values to reflect the actual
5 relationship between the rate classes and, as a result, assign total costs
6 incorrectly to the various classes;

7 2) Cost allocation errors create an improper analysis of existing and
8 proposed class revenues and rates of return leading to misinformed
9 revenue allocation decisions;

10 3) The use of billing quantities that understate sales quantities in rate
11 design leads to overstated component prices; and,

12 4) Inflated prices applied to the actual sales quantities result in excess
13 revenue.

14 **Inaccurate Cost Allocation**

15 Q. HAVE YOU ESTIMATED BILLING DETERMINANTS THAT MORE ACCURATELY REFLECT
16 THE LOAD PROFILE FOR THE OFF-PEAK SERVICE CLASS?

17 A. Yes. I estimated billing determinants by applying the billing determinant
18 relationships from the COSS filed in the 2015 Rate Case to the OPS class load profile.

19 Specifically, I estimated the kWh sales for the class using the relationship between

20 the class load profile energy and the kWh sales in the 2015 Rate Case. I used the

21 diversity factor (= Billing Demand/NCP) from the 2015 Rate Case to estimate the

22 Billing Demand. See Exhibit ~~GWT~~SWC-7.

1 **Q. BASED ON THESE ESTIMATES, BY HOW MUCH ARE THE OFF-PEAK SERVICE CLASS**
2 **KWH SALES AND KW DEMAND BILLING DETERMINANTS UNDERSTATED?**

3 A. As shown in Table 1 below, the company has understated the current rate revenue
4 billing determinants by slightly more than 19 percent. *Id.*

Table 1: Estimated Understatement of Company Billing Determinants

Determinant	Company Value	Walmart Estimate	Difference	Percent Difference
kWh Sales	1,023,539,449	1,270,152,968	246,613,519	19.4%
kW Billing Demand	1,849,045	2,293,129	44,084	19.4%

5 **Q. DOES A DIFFERENCE OF THIS MAGNITUDE IMPACT THE ALLOCATORS USED IN THE**
6 **COSS?**

7 A. Yes. For example, the energy allocator for the OPS class within the Company's filed
8 COSS is 8.6 percent (= 1,042,183,440 kWh/12,096,308,562 kWh). See Direct
9 Testimony of J. Stephen Gaske, Attachment 18-E (Revised), p. 3. Using the Walmart
10 estimates for kWh sales the energy allocator is 10.3 percent (= 1,270,152,968
11 kWh/12,324,278,090 kWh).

12 **Misinformed Revenue Allocation**

13 **Q. DO CHANGES IN THE OFF-PEAK SERVICE CLASS RATE OF RETURN BETWEEN THE**
14 **2015 RATE CASE AND THIS RATE CASE INDICATE A POSSIBLE PROBLEM IN THE**
15 **CLASS COST OF SERVICE?**

16 A. Yes. There is a significant difference in the calculated class rate of return between
17 the 2015 Rate Case and this case relative to the overall system rate of return. At the

1 Company's proposed rates in the 2015 Rate Case, the class rate of return was 8.86
2 percent or an Index Rate of Return ("IRR") of 1.30. See Cause No. 44688, Direct
3 Testimony of J. Stephen Gaske, Attachment 17-C, p. 8. According to the Company's
4 filed COSS in this case, the rate of return at current rates for the OPS class is 3.41
5 percent, or an IRR of 0.68. See Direct Testimony of J. Stephen Gaske, Attachment
6 18-C (Revised), p. 2.

7 **Q. WHAT IS THE PURPOSE OF THE CLASS IRR?**

8 A. IRR is used to represent the accuracy of the class revenues in reflecting the
9 underlying costs of service to each class. An IRR greater than one (1.0) means that
10 the rate class is paying rates in excess of the costs incurred to serve that class, and
11 an IRR less than one (1.0) means that the rate class is paying rates less than the costs
12 incurred to serve that class. As such, when rates are set such that a class does not
13 have an IRR equal to one (1.0) there are inter-class subsidies, as those rate classes
14 with an IRR greater than one (1.0) shoulder some of the revenue responsibility
15 burden for the classes with an IRR less than one (1.0).

16 **Q. BASED ON YOUR EXPERIENCE, DO CHANGES IN IRR OF THIS MAGNITUDE, FROM**
17 **1.30 TO 0.68, TYPICALLY OCCUR BETWEEN RATE CASES FILED THREE YEARS APART?**

18 A. No. In my experience, this magnitude of a change in a class's rate of return relative
19 to the overall rate of return is uncommon, especially in established classes like the
20 Company's OPS class. Again, if this type of change occurs within a class, one would

1 expect that the causes of such a significant change would merit further discussion in
2 the filed case. NIPSCO did not provide any such explanation.

3 **Q. HAVE YOU CALCULATED THE DIFFERENCE IN THE CURRENT RATE REVENUE FROM**
4 **THE COMPANY'S PROPOSED COSS AND THE CURRENT RATE REVENUE BASED ON**
5 **YOUR ESTIMATED BILLING DETERMINANTS?**

6 A. Yes. Using my estimated billing determinants for the class, the current rate revenue
7 for the OPS class is \$20.4 million higher than the current rate revenue included in
8 the Company's filed COSS. See Exhibit ~~GWT~~SWC-8.

9 **Q. WOULD THE \$20.4 MILLION UNDERSTATEMENT IN CLASS REVENUE IMPACT THE**
10 **IRR AT CURRENT RATES IN THE COSS?**

11 A. Yes. The combination of the understated revenue and the likely changes to cost
12 allocation results in miscalculation of the class and system rates of return. The
13 magnitude of the difference in class rates of return and the resulting IRR is
14 dependent on the magnitude of the changes in the allocators and revenue amounts.

15 **Q. IS IT POSSIBLE FOR THE COMMISSION TO UNDERSTAND THE CURRENT SUBSIDY**
16 **LEVELS BASED ON THE COMPANY'S FILED COSS?**

17 A. No. The use of inaccurate energy sales and billing demand determinant data leads
18 to errors in cost allocation, current rate revenue, and the calculation of the rate of
19 return. These inaccuracies will lead to the calculation of erroneous subsidy
20 amounts. Without accurate information on the underlying subsidies, the

1 Commission is unable to identify the scope of inter-class subsidies and address them
2 appropriately when making revenue allocation decisions.

3 **Q. WHAT IS REVENUE ALLOCATION?**

4 A. Revenue allocation is the assignment of the revenue responsibility to each customer
5 class. A revenue allocation that assigns revenue to each class at the class's cost of
6 service is said to be free of inter-class subsidies.

7 **Q. ARE THERE INSTANCES IN WHICH THE COMMISSION WOULD ASSIGN A DIFFERENT
8 REVENUE AMOUNT TO INDIVIDUAL CLASSES THAN IS CALLED FOR WITHIN THE
9 COSS, RESULTING IN INTER-CLASS SUBSIDIES?**

10 A. Yes. At times, a regulator may find it necessary to approve a level of revenue
11 requirement to a particular class that differs from the cost responsibility amount
12 determined in the COSS. This is often driven by the need to ensure that customers
13 are not seriously adversely impacted by major changes to the level of rates. Other
14 reasons can include perceived differences in COSS results and reality, relative risks
15 assigned to classes, social goals associated with the role of the prices in a particular
16 jurisdiction, and response to the state of the economy within or external to the
17 regulatory jurisdiction. The Commission may exercise its discretion based on one or
18 more of these concerns to adjust revenue allocation to support policy or advance
19 the public interest; however, these adjustments often result in rates that are not
20 cost-based and, as a result, not just, reasonable, and equitable.

1 **Q. WHAT IS THE COMMISSION'S ULTIMATE GOAL WHEN ALLOCATING REVENUE?**

2 A. To the extent possible, the Commission should eliminate inter-class subsidies
3 through a revenue allocation that reflects the cost of service. If this is not possible in
4 the immediate case, the Commission should establish a clear path to the elimination
5 or reduction of undesired subsidies, continually moving each class closer to their
6 respective cost of service until undesired subsidies are eliminated and price signals,
7 and thus system efficiency, are improved.

8 **Q. GIVEN THE INACCURACIES IN THE COMPANY'S IRR CALCULATIONS CONTAINED IN**
9 **ITS COST OF SERVICE, IS THE ELIMINATION OR TARGETED REDUCTION OF**
10 **SUBSIDIES AN ATTAINABLE GOAL?**

11 A. No. The Commission requires an accurate COSS to understand and effectively
12 address inter-class subsidies. If the Commission does not understand the current
13 subsidy levels it is unlikely that the revenue increase can be allocated to classes in
14 such a way to create meaningful reductions in existing subsidy levels.

15 **Inflated Component Prices**

16 **Q. HOW ARE PRICES DETERMINED IN THE RATE DESIGN PROCESS?**

17 A. Prices are set to recover a class's revenue requirement as accurately as possible.
18 This is accomplished by determining the expected billing quantities for the class,
19 assigning prices that roughly reflect the underlying costs, and fine-tuning the

1 component prices to ensure an accurate collection of the revenue requirement
2 when the rates are approved and implemented.

3 **Q. IF RATE DESIGN INCLUDES UNDERSTATED BILLING DETERMINANTS, WHAT IS THE**
4 **IMPACT ON THE RESULTING PRICES?**

5 A. Since the revenue requirement target is fixed, the understated billing quantities
6 used in rate design will necessarily result in overstated prices. For example, if the
7 revenue requirement is \$100 and the billing quantity is 10 units then a price of \$10
8 (= \$100/10) results in the proper recovery of revenue. If the billing quantity used in
9 price calculation is understated at only 8 units, the price of \$12.50 (= \$100/8 units),
10 which is \$2.50 higher than the price needed to collect \$100 based on the actual sales
11 of 10 units.

12 **Q. ARE THE BILLING QUANTITIES USED IN THE COMPANY'S RATE DESIGN REFLECTIVE**
13 **OF THE SALES EXPECTED WHEN THE APPROVED RATES GO INTO AFFECT?**

14 A. No. Assuming that the class load profile represents the class's contribution to total
15 system requirements, the billing quantities used in price calculation should reflect
16 the previously discussed energy sales and demand billing determinants as estimated
17 and presented in my testimony. See Exhibit [GWTSWC-7](#)

1 Q. USING THE WALMART ESTIMATED BILLING QUANTITIES AND TARGETING THE
2 COMPANY'S PROPOSED RATE REVENUE REQUIREMENT BY REDUCING ONLY THE
3 ENERGY PRICE, WHAT IS THE DIFFERENCE FOR THE ENERGY PORTION OF THE
4 RATE?

5 A. Targeting the class proposed rate revenue requirement of \$101.6 million by
6 adjusting the energy charge results in a reduction to the energy price from the
7 Company's proposed 4.925 cents per kWh to 3.105 cents per kWh. See Exhibit
8 [GWTSWC-9](#).

9 **Excess Revenue**

10 Q. HOW WILL THE INFLATED PRICE AFFECT THE COMPANY'S ACTUAL REVENUE WHEN
11 THE NEW RATES ARE IMPLEMENTED?

12 A. Using the inflated prices will create revenue levels above the design targets. The
13 Company's expected sales to the OPS class, represented by the load profile and its
14 corresponding billing quantities, exceed the billing quantities used to calculate
15 prices. The resulting inflated prices will be applied to higher billing quantities than
16 those used in rate design, leading to actual revenues that exceed target revenues.

17 Q. CONTINUING THE EARLIER EXAMPLE, WHAT IS THE RESULTING EXCESS REVENUE
18 COLLECTED BY THE COMPANY?

19 A. In that example, the price is inflated by \$2.50 using the understated billing quantity.
20 If the actual sales are, in fact, 10 units, then the resulting revenue is \$125 (= 10 x

1 \$12.50) – \$25 higher than the revenue requirement for which the price was
2 designed.

3 **Q. HAVE YOU ESTIMATED THE EXCESS REVENUE USING THE COMPANY'S PROPOSED**
4 **PRICES IF THE ACTUAL SALES ARE ADJUSTED TO REFLECT WALMART'S ESTIMATED**
5 **BILLING QUANTITIES?**

6 A. Yes. The excess revenues are about \$23.1 million using Walmart's estimated billing
7 quantities. See Exhibit ~~GWT~~SWC-10

8 **Q. ARE YOU AWARE OF ISSUES WITH OTHER RATE CLASSES SIMILAR TO THOSE YOU**
9 **HAVE IDENTIFIED IN THE OFF-PEAK SERVICE CLASS?**

10 A. No. My review was limited to the OPS class, however, the total system load profile
11 provided by the Company shows a total energy that is far greater than the total kWh
12 sales or billing quantity reported in the Company's COSS.⁵ While I do not know its
13 source, the difference indicates possible issues exist in other classes of the
14 Company's COSS.

⁵ The Company's system load profile shows total kWh of 17.5 billion kWh. The Company's total kWh sales in the COSS is 12.1 billion kWh.

1 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION REGARDING THE**
2 **PROPOSED COSS?**

3 A. The Commission should reject NIPSCO's proposed COSS because it contains errors
4 that lead to rates that are not just and reasonable. The proposed COSS reflects
5 energy consumption and billing demand determinant data that is not aligned with
6 the class load profile for the OPS class, and possibly other classes. The errors in the
7 OPS class affect the COSS results and rates for all classes. Only through an accurate
8 verified COSS can the Commission establish just and reasonable rates for all
9 customers served by NIPSCO.

10 **Q. GIVEN THE NATURE OF THIS CASE, SHOULD THE COMMISSION TAKE ADDITIONAL**
11 **PRECAUTIONS WITH RESPECT TO THE ACCURACY AND APPLICABILITY OF THE COSS**
12 **RESULTS THAN MIGHT BE REQUIRED IN A TYPICAL RATE CASE?**

13 A. The accuracy of the COSS is always critical to establishing just and reasonable rates.
14 In this specific case the Company proposes a significant structural change in its
15 operations and the underlying costs of service to a small group of its five largest
16 customers. The Company claims that this is a policy case dealing with a changing
17 marketplace. See Direct Testimony of Paul S. Kelly, p. 2, lines 9-11.

18 The Commission must ensure that any policy established through its order in this
19 case is based on accurate and complete evidence. Failure to fully understand the
20 impact of these structural changes while establishing a significant policy prevents a

1 balancing of the interests of the utility with the interests of all its customers.
2 Additionally, in the context of this rate case, the Commission must also consider the
3 balance of interests between the five largest industrial customers and the remaining
4 customers.

5 ***Revenue Allocation***

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROCESS USED TO ARRIVE AT THE**
7 **COMPANY'S PROPOSED REVENUE ALLOCATION?**

8 A. According to Company witness Michael Hooper, the Company began with its fully
9 allocated cost of service, designed rates for the newly proposed Rate 831 at cost,
10 and then, due to the percentage increases being excessive for the residential rate
11 class, proposed an equal percentage increase of 11.76 percent to all classes except
12 Rate 831. See Direct Testimony of Michael Hooper, p. 21, lines 3-13.

13 **Q. WHAT IS THE COMPANY'S PROPOSED IRR FOR EACH RATE CLASS AT PRESENT**
14 **RATES AND THE COMPANY'S PROPOSED REVENUE ALLOCATION?**

15 A. The present and proposed IRR for each class is shown in Table 2.⁶ See Direct
16 Testimony of J. Stephen Gaske, Attachment 18-C (Revised), pp. 1-3, 7-9.

⁶ These are the Company's proposed values and are not adjusted to reflect the inconsistencies within the COSS discussed within my testimony.

Table 2: Present and Proposed Index Rate of Return

CLASS (Rate Class)	Present		Proposed	
	Return (%)	IRR	Return (%)	IRR
Residential (811)	2.59	0.52	3.37	0.48
C&GS Heat Pump (820)	4.23	0.84	6.28	0.89
GS Small (821)	6.61	1.32	10.48	1.49
Comml SH (822)	7.41	1.48	11.93	1.70
GS Medium (823)	7.40	1.48	12.12	1.73
GS Large (824)	7.77	1.55	13.01	1.85
Metal Mining (825)	6.61	1.32	11.29	1.61
Off-Peak Serv. (826)	3.41	0.68	5.13	0.73
Ind. Pwr Serv. – Large (831)	9.76	1.95	7.02	1.00
Ind. Pwr Serv. – Small (830)	1.96	0.39	7.52	1.07
Muni. Power (841)	5.39	1.08	8.34	1.19
Int WW Pumping (842)	50.01	9.99	88.18	12.56
Railroad (844)	6.74	1.35	10.47	1.49
Street Lighting (850)	2.26	0.45	3.07	0.44
Traffic Lighting (855)	9.48	1.89	15.91	2.27
Dusk-to-Dawn (860)	0.68	0.14	1.70	0.24
Total	4.98	1.00	7.02	1.00

1 **Q. DOES THE COMPANY'S PROPOSED REVENUE ALLOCATION MOVE RATE CLASSES**
 2 **CLOSER TO THEIR RESPECTIVE COSTS OF SERVICE?**

3 A. No. Most classes are moved away from their respective cost of service. The
 4 Company is proposing to increase the subsidy burden on all subsidizing classes (*i.e.*,
 5 those that have an IRR above 1.0) except the newly created Rate 831 class. As such,
 6 the Company's proposed revenue allocation is counter to the goal of eliminating or
 7 establishing a targeted reduction of subsidies for all classes.

1 **Q. IS WALMART CONCERNED WITH THE COMPANY'S REVENUE ALLOCATION**
2 **METHODOLOGY?**

3 A. Yes. Walmart is concerned that the Company's revenue allocation methodology
4 does not reduce the existing subsidies for all classes. Instead, the Company
5 proposes to eliminate the subsidy on the large industrial class and transfer that
6 subsidy burden to other classes.

7 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION FOR REVENUE**
8 **ALLOCATION?**

9 A. The Commission should allocate the authorized revenue in a manner that targets
10 and reduces the subsidy burden for all subsidizing classes. Generally, this can be
11 done by ordering an increase to subsidizing classes that is lower than the system
12 average increase coupled with an increase to subsidized classes that is above the
13 system average without causing an unduly burdensome rate increase on any class.

14 **Q. HAVE YOU PREPARED A PROPOSED ALLOCATION THAT WOULD PROVIDE A**
15 **TARGETED SUBSIDY REDUCTION FOR ALL CLASSES?**

16 A. No. Due to the COSS concerns discussed earlier, rendering the Company's COSS to
17 be unusable, Walmart is not proposing a specific revenue allocation at this time.
18 However, Walmart may revisit its cost of service recommendation when our
19 concerns with the COSS are addressed and a more accurate assessment of the
20 existing and proposed subsidy burden is available.

1 ***Rate Design***

2 **Q. WHAT IS THE COMPANY'S APPROACH TO RATE DESIGN FOR THE OFF-PEAK**
3 **SERVICE RATE?**

4 A. According to Company witness Gaske, the general approach used was to increase
5 demand charges, or the first block of demand charges, to reflect the average
6 percentage increase in margin in this proceeding. The remainder of the increase
7 was assigned to energy charges. See Direct Testimony of J. Stephen Gaske, p. 53,
8 lines 8-14.

9 **Q. IS WALMART OPPOSED TO THE APPROACH USED BY THE COMPANY IN SETTING**
10 **RATES FOR THE OFF-PEAK SERVICE CLASS?**

11 A. For the purposes of this docket and assuming accurate billing determinants are used
12 to set prices, Walmart does not oppose the Company's approach to rate design for
13 the OPS class. Again, Walmart reserves its right to address the rate design further
14 when our concerns with the COSS are addressed.

15 ***Rate 831***

16 **Q. IS THE COMPANY PROPOSING TO MODIFY ITS INDUSTRIAL RATE STRUCTURE?**

17 A. Yes. The Company is proposing Rate 831 Market Sensitive Industrial Service
18 Structure ("Rate 831"), a new rate structure targeted to the Company's five largest
19 industrial customers. The remaining industrial customers will be migrated to the
20 newly established Rate 830.

1 **Q. WHAT IS THE COMPANY'S STATED REASONS FOR ITS PROPOSAL TO ESTABLISH**
2 **RATE 831?**

3 A. The Company cites recent losses in load and concerns regarding the potential loss of
4 additional firm loads. The result of further reductions in the load requirement of
5 these customers will, according to the Company, result in decreased revenue and
6 operating margins and shifts in costs to the remaining customer classes. See Direct
7 Testimony of Paul S. Kelly, p. 4, line 11 through p. 5, line 9.

8 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED RATE 831?**

9 A. It is my understanding that the Company has proposed Rate 831 to allow its largest,
10 most sophisticated customers access to market-based rates to serve some portion of
11 their capacity and energy requirements. The rate is described by Company witness
12 Paul S. Kelly. See *id.* at 7, line 8 through p. 10, line 10.

13 **Q. WILL THE PROPOED RATE 831 CREATE A SHIFT OF COSTS TO THE REMAINING**
14 **CUSTOMER CLASSES?**

15 A. As proposed, Rate 831 will create a shift of fixed production costs currently allocated
16 and recovered from the five largest industrial customers to the remainder of the
17 Company's customers. *Id.* at 13, line 16 through p. 14, line 1.

18 **Q. IS WALMART CONCERNED WITH THE COMPANY'S PROPOSED RATE 831?**

19 A. Yes. Walmart is concerned that Rate 831 results in: (1) an unjust shift in cost
20 responsibility from the Company's five largest industrial customers to the remaining

1 customers; (2) the establishment of customer access to the wholesale market which
2 fails to properly assign transition costs to the departing load; and (3) eligibility
3 requirements that appear to be unduly discriminatory.

4 **Q. HOW MUCH OF THE COST ASSOCIATED WITH SERVING THESE FIVE CUSTOMERS IS**
5 **BEING SHIFTED TO OTHER CUSTOMERS?**

6 A. According the Company's response to Data Requests issued by the Office of Utility
7 Consumer Counselor ("OUCC"), and reviewed by Walmart, the shift due to the
8 proposed Rate 831 is approximately \$40.2 million. See NIPSCO's Response to OUCC
9 Data Request 5-010, Attachment A. However, there are other cost shifts being
10 proposed including additional shifts of \$38.5 million and \$5.8 million. *Id.* This brings
11 the total proposed impact on the non-participating customers to approximately
12 \$84.5 million.

13 **Q. GENERALLY, WHICH UTILITY FUNCTION DOES THE COST BEING SHIFTED FROM**
14 **RATE 831 CUSTOMERS ONTO THE REMAINING CUSTOMERS REPRESENT?**

15 A. Generally, these costs represent the production function of the utility's service. The
16 cost shift is the result of reducing the production plant allocator to match the firm
17 level of capacity elected by the five largest industrial customers eligible for Rate 831.
18 Under NIPSCO's proposal, the cost of the remainder of the production capacity
19 currently allocated to those five customers will be allocated to the remaining
20 customer classes.

1 **Q. HOW MUCH FIRM CAPACITY DOES THE COMPANY EXPECT THESE FIVE CUSTOMERS**
2 **TO ELECT UNDER RATE 831?**

3 A. The Company has designed rates to reflect firm service to these customers of
4 approximately 184.6 MW. *See* Direct Testimony of Paul S. Kelly, p. 14, line 8. The
5 Company has also proposed to true rates up to reflect the actual firm service
6 commitments taken by the Rate 831 participants. *Id.* at 15, lines 1-5.

7 **Q. HOW MUCH OF THE COMPANY'S CURRENT CAPACITY IS REQUIRED TO SERVE THE**
8 **REMAINING FIRM SERVICE CUSTOMERS THAT WILL NOT PARTICIPATE IN RATE**
9 **831?**

10 A. According to information received in response to Walmart Data Request 1-011, the
11 Company states that the total capacity requirement is 3,150 MW. However, NIPSCO
12 has not performed the analysis to identify the capacity required to serve the Rate
13 831 participants or non-participants. *See* Exhibit ~~GWT~~SWC-11

14 **Q. DOES THE IMPLEMENTATION OF RATE 831 CHANGE THE CAPACITY REQUIREMENT**
15 **TO SERVE CUSTOMERS NOT SERVED UNDER THE PROPOSED RATE 831?**

16 A. No. Regardless of the firm service election of the five largest customers that will
17 participate in Rate 831, the capacity requirement to serve the remaining customers
18 will remain unchanged.

1 **Q. DOES THE IMPLEMENTATION OF RATE 831 IMPACT THE CAPACITY REQUIREMENT**
2 **OF THE FIVE LARGEST INDUSTRIAL CUSTOMERS?**

3 A. According to the Company's response to Walmart Data Request 01-011, the capacity
4 requirement will not be affected by the firm service election of the five largest
5 industrial customers expected to participate in Rate 831. *Id.*

6 **Q. GIVEN THE CONSISTENCY IN CAPACITY REQUIREMENTS FOR BOTH PARTICIPANTS**
7 **AND NON-PARTICIPANTS, SHOULD PRODUCTION CAPACITY COSTS BE ALLOCATED**
8 **DIFFERENTLY UNDER THE PROPOSED STRUCTURE OF RATE 831?**

9 A. No. Since the capacity requirements are unaffected by the implementation of Rate
10 831, all customers should continue to be held responsible for the same production
11 capacity costs under the proposed Rate 831. No change to the allocation
12 methodology should occur.

13 **Q. IS THE COMPANY'S PROPOSED SHIFT OF COST RESPONSIBILITY FROM RATE 831**
14 **PARTICIPANTS TO NON-PARTICIPANTS A COST-BASED PROPOSAL?**

15 A. No. The proposed shift in costs from the five largest industrial customers under Rate
16 831 and the remaining customers is not cost based and therefore is not just and
17 reasonable.

1 **Q. DOES THE PROPOSED RATE 831 PROVIDE, IN ESSENCE, WHOLESALE ELECTRIC**
2 **MARKET ACCESS TO THE PARTICIPATING CUSTOMERS?**

3 A. According the Company's description, it appears the proposed Rate 831 is, in its
4 essence, establishing access to the wholesale market to the five largest industrial
5 customers through the Company's status as a market participant. See Direct
6 Testimony of Andrew S. Campbell, p. 9, line 10 through p. 25, line 9.

7 **Q. DOES THE COMPANY'S PROPOSED TRANSITION TO WHOLESALE MARKET ACCESS**
8 **FOR THESE CUSTOMERS PROPERLY ADDRESS THE IMPACT OF THE DEPARTING**
9 **LOAD?**

10 A. No. The Company's proposal does not account for the impact of the departing load
11 on customers that continue to receive full requirements service from the utility. For
12 example, in California, state law requires customers that take service through third-
13 party energy providers to pay a power charge indifference adjustment ("PCIA"). The
14 PCIA or *exit fee* ensures that remaining customers are not left with the responsibility
15 to pay transition costs that should be the responsibility of the departing customers.

16 **Q. ARE THERE OTHER IMPLICATIONS OF THE TRANSITION TO MARKET ACCESS THAT**
17 **THE COMMISSION SHOULD TAKE INTO CONSIDERATION?**

18 A. Absolutely. The Company is proposing that the Commission establish access to the
19 wholesale market in Indiana to only a select few customers that it describes as
20 NIPSCO's largest, most sophisticated customers. If it establishes such a program for

1 only a few large customers, the Commission is precluding other large, sophisticated
2 customers from participating in the wholesale market.

3 **Q. ARE OTHER CUSTOMERS IN THE STATE OF INDIANA SUFFICIENTLY LARGE AND**
4 **SOPHISTICATED TO PARTICIPATE IN THE WHOLESALE MARKET?**

5 A. Yes. Walmart is one such customer. In fact, Texas Retail Energy, a Walmart owned
6 entity is a registered market participant in wholesale markets across the nation and
7 is a participant in the Midcontinent Independent System Operator, Inc. ("MISO")
8 Energy and Operating Reserve Market ("MISO Market").

9 **Q. AS A POLICY MATTER, SHOULD THE COMMISSION CONSIDER THE FAIRNESS OF**
10 **ESTABLISHING A PROGRAM THAT PROVIDES ACCESS TO ONLY A FEW CUSTOMERS**
11 **BASED ON THE NIPSCO'S PROPOSED ELIGIBILITY REQUIREMENTS?**

12 A. While I am not an attorney, the proposed program appears to be unduly
13 discriminatory and should be carefully scrutinized as the Commission considers
14 approval of Rate 831.

15 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION REGARDING THE**
16 **COMPANY'S PROPOSED RATE 831?**

17 A. The Commission should reject Rate 831 because it results in: (1) an unjust shift in
18 cost responsibility from the Company's five largest industrial customers to the
19 remaining customers; (2) the establishment of customer access to the wholesale

1 market which fails to properly assign transition costs to the departing load; and,
2 (3) eligibility requirements that appear to be unduly discriminatory.

3 **Q. IF THE COMMISSION DETERMINES THAT THE THREAT OF REDUCED INDUSTRIAL**
4 **LOAD WARRANTS IMMEDIATE ACTION, WHAT IS WALMART'S**
5 **RECOMMENDATION?**

6 A. If the Commission determines that immediate action is required to address the
7 concerns expressed by the Company regarding further reduction in firm loads by
8 industrial customers, the Commission should establish a solution that addresses the
9 immediate concerns while addressing the proposed burden on the remaining
10 customers during the transition to a more permanent solution.

11 **Q. DOES WALMART HAVE A CONCEPTUAL ALTERNATIVE TO THE COMPANY'S**
12 **PROPOSAL?**

13 A. Yes. Walmart proposes that the Commission:

- 14 1. Establish a cost of service and rate design that reflect full requirement
15 service to all customers including those eligible for Rate 831.
- 16 2. Assign a firm capacity level to each customer eligible for Rate 831 for
17 which the customer is responsible for the cost as a full requirements
18 customer.
- 19 3. To the extent that the customer is willing to relinquish its rights to the
20 firm capacity, allow the Company to make an off-system sale of the
21 customer's assigned and relinquished capacity and credit 100 percent of
22 the proceeds of the sale to the Customer.
- 23 4. When the Company fully retires current production assets (*e.g.*, the
24 proposed retirement of the Schafer coal fired generating units by
25 December 31, 2023, and Michigan City Unit 12 by December 31, 2028)

1 reduce the assigned firm capacity to the participating customers as well
2 as the cost assignment associated with that capacity.

3 5. To the extent that the Commission, in its discretion, desires to provide
4 additional relief to one or more industrial customers, the Commission
5 should establish an industrial subsidy rider, determine the appropriate
6 amount of relief for each customer, and establish just and reasonable
7 allocation of the subsidy to the remaining customers.

8 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

9 A. Yes.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBITS OF

~~GREGORY W. TILLMAN~~ STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
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AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT ~~GWT~~SWC-1 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Gregory W. TillmanSteve W. Chriss

~~Senior Manager, Energy Regulatory Analysis~~

~~Walmart Inc.~~

~~Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-5530~~

~~Business Phone: (479) 204-7993~~

EXPERIENCE

November 2015 — Present

~~Walmart Inc., Bentonville, AR~~

~~Senior Manager, Energy Regulatory Analysis~~

November 2008 — November 2015

~~Oklahoma Gas & Electric, Oklahoma City, OK~~

~~Product Development Pricing Leader~~

~~Manager, Pricing~~

~~Senior Pricing Analyst~~

May 2006 — November 2008

~~LSG Solutions, Oklahoma City, OK~~

~~Project Manager, International Registration Plan/Interstate Fuel Tax Agreement Systems Development~~

August 2002 — May 2006

~~OnPeak Utility Solutions, Oklahoma City, OK~~

~~Owner/Consultant~~

May 2000 — August 2002

~~Automated Energy, Inc., Oklahoma City, OK~~

~~Vice President, Utility Solutions~~

November 1997 — May 2000

~~Williams Energy, Tulsa, OK~~

~~Sr. Manager Accounting Services~~

~~Process Manager, Customer Billing and Accounting~~

~~Retail Systems Manager, Billing and Electricity~~

May 1990 — November 1997

~~Public Service Company of Oklahoma, Tulsa, OK~~

~~Manager, Software Development and Support~~

~~Supervisor, Data Translation and Power Billing~~

~~Administrator, Disaster Recovery and Research and Development~~

~~Programmer/Analyst~~

June 1987 — May 1990

~~United States Army, Signal Command, Ft. Monmouth, NJ~~

~~Project Officer, Joint Tactical Information Distribution System~~

EDUCATION

1991-1994 ~~_____~~ **The University of Tulsa** ~~_____~~ Graduate Coursework, M.B.A.
1987 ~~_____~~ **The University of Tulsa** ~~_____~~ B.S., Electrical Engineering

TESTIMONY BEFORE REGULATORY COMMISSIONS

2019

~~Oklahoma Corporation Commission Cause No. PUD-201800097: In the Matter of the Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in Its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma and to Approve a Performanced [sic] Base Rate Proposal.~~

~~Kentucky Public Service Commission, Case No. 2018-00294, Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates~~

~~Kentucky Public Service Commission, Case No. 2018-00295, Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates~~

~~Indiana Utility Regulatory Commission, Cause No. 45145, Petition of Duke Energy Indiana, Llc: For approval of a Solar Services Program Tariff, Rider No. 26, and approval of Alternative Regulatory Plan ("ARP") and Declination of Jurisdiction to the extent required under Ind. Code 8-1-2.5-1, et. Seq.~~

2018

~~Michigan Public Service Commission Case No. U-20162. In the matter of the Application of DTE-ELECTRIC COMPANY for authority to increase its rates for its rate schedules and rules governing the generation and distribution of electricity and for other relief.~~

~~Public Service Commission of West Virginia Case No. 18-0646-E-42T. Appalachian Power Company and Wheeling Power Company, Rule 42T Application to increase electric rates and charges.~~

~~Michigan Public Service Commission Case No. U-20134. In the matter of the Application of CONSUMERS ENERGY COMPANY for authority to increase its rates for its rate schedules and rules governing the generation and distribution of electricity and for other relief.~~

~~New Jersey Board of Public Utilities Docket Nos. ER18010029 and GR18010030, 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.~~

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

~~Commonwealth of Virginia State Corporation Commission, Case No. PUR-2018-00048, Application of Appalachian Power Company for the Determination of the Fair Rate of Return on Common Equity Pursuant to Va. Code § 56-585.1:1.C.~~

~~Pennsylvania Public Utility Commission, Docket No. R-2018-3000164, Pennsylvania Public Utility Commission v. PECO Energy Company — Electric Division.~~

~~Pennsylvania Public Utility Commission, Docket No. R-2018-3000124, Pennsylvania Public Utility Commission v. Duquesne Light Company.~~

~~Public Utility Commission of Nevada, Docket No. 18-02010 Application of Nevada Power Company D/B/A Nv Energy Filed Under Advice Letter No. 485 To Revise Tariff No. 1-B To Establish The 2017 Tax Rate Reduction Rider; Docket No. 18-02011 Application of Application Of Sierra Pacific Power Company D/B/A Nv Energy Filed Under Advice Letter No. 605-E To Revise Electric Tariff No. 1 To Establish The 2017 Tax Rate Reduction Rider; and, Docket No. 18-02012 Application Of Sierra Pacific Power Company D/B/A Nv Energy Filed Under Advice Letter No. 326-G To Revise Gas Tariff No. 1 To Establish The 2017 Tax Rate Reduction Rider.~~

~~Indiana Utility Regulatory Commission, Cause No. 45029, Petition of Indianapolis Power & Light Company ("IPL") for (1) Authority to Increase Rates and Charges for Electric Utility Service, (2) Approval of Revised Depreciation Rates, Accounting Relief, Including Update of the Major Storm Damage Restoration Reserve Account, Approval of a Vegetation Management Reserve Account, Inclusion in Basic Rates and Charges of the Costs of Certain Previously Approved Projects, Including the Eagle Valley Combined Cycle Gas Turbine, the National Pollution Discharge Elimination System and Coal Combustion Residuals Compliance Projects, Rate Adjustment Mechanism Proposals, Cost Deferrals, Amortizations, and (3) Approval of New Schedules of Rates, Rules and Regulations for Service.~~

~~Oklahoma Corporation Commission Cause No. PUD 201700496: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma~~

~~Public Utility Commission of Texas Docket No. 47527, in the matter of the Application of Southwestern Public Service for Authority to Change Rates.~~

~~The Rhode Island Public Utilities Commission Docket No. 4770: In re: The Narragansett Electric Company d/b/a National Grid Electric and Gas Distribution Rate Filing.~~

~~Connecticut Public Utilities Regulatory Authority Docket No. 17-10-46: Application of the Connecticut Light and Power Company D/B/A Eversource Energy to Amend its Rate Schedules.~~

2017

~~Indiana Utility Regulatory Commission Cause No. 44967-NONE: Petition of Indiana Michigan Power Company, an Indiana corporation, for (1) authority to increase its rates and charges for electric utility service through a phase in rate adjustment; (2) approval of: revised depreciation rates; accounting relief; inclusion in basic rates and charges of qualified pollution control property, clean energy projects and cost of bringing I&M's system to its present state of efficiency; rate adjustment mechanism proposals; cost deferrals; major storm damage restoration reserve and distribution vegetation management program reserve; and amortizations; and (3) for approval of new schedules of rates, rules and regulations.~~

~~Public Service Commission of Wisconsin Docket No. 4220-UR-123: Application of Northern States Power Company, a Wisconsin Corporation for Authority to Adjust Electric and Natural Gas Rates~~

~~Michigan Public Service Commission Case No. U-18255. In the matter of the Application of DTE ELECTRIC COMPANY for authority to increase its rates for its rate schedules and rules governing the generation and distribution of electricity and for other relief.~~

~~Michigan Public Service Commission Case No. U-18322: In the matter of the Application of CONSUMERS ENERGY COMPANY for authority to increase its rates for its rate schedules and rules governing the generation and distribution of electricity and for other relief.~~

~~Iowa Utilities Board Docket No. RPU-2017-0001: In re: Interstate Power and Light Company.~~

~~Public Service Commission of Kentucky Case No. 2017-00179: In the Matter of the Electronic Application of Kentucky Power Company for (1) A General Adjustment of its Rates for Electric Service; (2) An Order Approving its 2017 Environmental Compliance Plan; (3) An Order Approving its Tariffs and Riders; (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) An Order Granting all other Required Approvals and Relief.~~

~~Public Service Commission of Kentucky Case No. 2016-00370: In the Matter of the Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates and for Certificates of Public Convenience and Necessity.~~

~~Public Service Commission of Kentucky Case No. 2016-00371: In the Matter of the Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates and for Certificates of Public Convenience and Necessity.~~

2016

~~Arizona Corporation Commission Docket No. E-01345A-16-0036: In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of the Utility Property of the Company for Ratemaking Purposes, to Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.~~

~~Public Service Commission of South Carolina Docket No. 2016-227-E: IN RE: Application of Duke Energy Progress, LLC for Authority to Adjust and Increase Its Electric Rates and Charges~~

~~Arkansas Public Service Commission Docket No. 16-027-R: In The Matter of Net Metering and The Implementation of Act 827 of 2015.~~

~~Public Utility Commission of Texas Docket No. 45524, in the matter of the Application of Southwestern Public Service for Authority to Change Rates~~

~~Public Service Commission of Wisconsin Docket No. 4220-UR-122: Application of Northern States Power Company, a Wisconsin Corporation for Authority to Adjust Electric and Natural Gas Rates~~

~~Michigan Public Service Commission Case No. U-18014. 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.~~

~~Arizona Corporation Commission Docket No. E-01933A-15-0322: In the Matter of the Application of Tucson Electric Power Company For the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of Tucson Electric Power Company Devoted to its Operations Throughout the State of Arizona, and for Related Approvals.~~

2015

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

2012

~~Arkansas Public Service Commission Docket No. 12-067-U: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order Approving a Temporary Surcharge to Recover the Costs of a Renewable Wind Generation Facility~~

2011

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

2010

~~Arkansas Public Service Commission Docket No. 10-067-U: In the Matter of the Application of Oklahoma Gas and Electric Company for Approval of a General Change in Rates and Tariffs~~

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

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

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

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

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001 Louisiana State University M.S., Agricultural Economics

1997-1998 University of Florida Graduate Coursework, Agricultural Education and Communication

1997 Texas A&M University B.S., Agricultural Development

B.S., Horticulture

MEMBERSHIPS

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

[Renewable Energy Buyers Alliance, Advisory Board](#)

TESTIMONY BEFORE REGULATORY COMMISSIONS

2019

[Texas Docket No. 49421: Application of Centerpoint Energy Houston Electric, LLC for Authority to Change Rates.](#)

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

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

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

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

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

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

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

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

2018

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[Texas Docket No. 46449: Application of Southwestern Electric Power Company for Authority to Change Rates.](#)

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

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

[Florida Docket No. 160186-Ei: In Re: Petition for Increase in Rates by Gulf Power Company.](#)

2016

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

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

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

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

[Pennsylvania Public Utility Commission Docket No. R-2016-2537359: Pennsylvania Public Utility Commission v. West Penn Power Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2016-2537352: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2016-2537355: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2016-2537349: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.](#)

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

[Florida Docket No. 160021-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.](#)

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

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

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

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

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

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

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

2015

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

[Public Utility Commission of Texas Docket No. 44941: Application of El Paso Electric Company to Change Rates.](#)

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

[Rhode Island Public Utilities Commission Docket No. 4568: In Re: National Grid's Rate Design Plan.](#)

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

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

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

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

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

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

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

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

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

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

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

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

[Public Utility Commission of Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.](#)

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

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

[Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; \(2\) an Order Approving its 2014 Environmental](#)

[Compliance Plan; \(3\) an Order Approving its Tariffs and Riders; and \(4\) an Order Granting All Other Required Approvals and Relief.](#)

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

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

2014

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

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

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

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

[Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.](#)

[Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.](#)

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

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

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

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

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

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

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

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

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

[Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.](#)

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

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

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

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

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

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

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

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

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

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

2013

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

[Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.](#)

[Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.](#)

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

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

[Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.](#)

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

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

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

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

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

[Florida Public Service Commission Docket No. 130040-EI: Petition for Rate Increase by Tampa Electric Company.](#)

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

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

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

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

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

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

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

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

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

2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2011

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2010

[Public Utilities Commission of Ohio Docket No. 10-2586-EL-SSO: In the Matter of the Application of Duke](#)

[Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.](#)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

2008

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

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

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

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

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

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

2007

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

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

[2006](#)

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

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

[Public Utility Commission of Oregon Docket No. UM 1129 Phase II: Investigation Related to Electric Utility Purchases From Qualifying Facilities.](#)

[2005](#)

[Public Utility Commission of Oregon Docket No. UM 1129 Phase I Compliance: Investigation Related to Electric Utility Purchases From Qualifying Facilities.](#)

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

[2004](#)

[Public Utility Commission of Oregon Docket No. UM 1129 Phase I: Investigation Related to Electric Utility Purchases From Qualifying Facilities.](#)

TESTIMONY BEFORE LEGISLATIVE BODIES

[2019](#)

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

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

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

[Regarding Kansas Senate Bill 69: Written testimony submitted to the Kansas Committee on Utilities, February 19, 2019.](#)

[2018](#)

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

[2017](#)

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

[2016](#)

[Regarding Missouri House Bill 1726: Testimony before the Missouri House Energy and Environment Committee, April 26, 2016.](#)

2014

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

2012

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

2011

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

AFFIDAVITS

2015

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

2011

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

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

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

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

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

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

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

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

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

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

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

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

[Panelist, Meeting Corporate Clean Energy Requirements in Virginia, Renewable Energy Buyers Alliance Summit, Oakland, California, October 15, 2018.](#)

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

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

[Panelist, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.](#)

[Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.](#)

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

[Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.](#)

[Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.](#)

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

[Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.](#)

[Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.](#)

[Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.](#)

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

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

[Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.](#)

[Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.](#)

[Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.](#)

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

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

[Presenter, Advancing Renewables in the Midwest, Columbia, Missouri, April 24, 2017.](#)

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

[Panelist, Private Sector Demand for Renewable Power, Vanderbilt Law School, Nashville, Tennessee, April 4, 2017.](#)

[Panelist, Expanding Solar Market Opportunities, 2017 Solar Power Colorado, Denver, Colorado, March 15, 2017.](#)

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

[Panelist, The Business Case for Clean Energy, Minnesota Conservative Energy Forum, St. Paul, Minnesota, October 26, 2016.](#)

[Panelist, M-RETS Stakeholder Summit, Minneapolis, Minnesota, October 5, 2016.](#)

[Panelist, 40th Governor's Conference on Energy & the Environment, Kentucky Energy and Environment Cabinet, Lexington, Kentucky, September 21, 2016.](#)

[Panelist, Trends in Customer Expectations, Wisconsin Public Utility Institute, Madison, Wisconsin, September 6, 2016.](#)

[Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.](#)

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

[Panelist, Customer Panel, Virginia State Bar 29th National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.](#)

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

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

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

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

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

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

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

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT ~~GWT~~SWC-2 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE Increase

(1)	Petitioner's Exh No. 4, Att. 4-A-S2	NIPSCO Requested Rate of Return on Total Company Capitalization		7.02%
		1) Calculate Rate of Return Using ROE = 9.975%		
		Capital Component	Percentage of Total	Cost
				Weighted Cost
(2)	=9.975%	Common Equity	47.86%	9.98%
(3)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Long-Term Debt	35.94%	4.97%
(4)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Customer Deposits	1.19%	4.91%
(5)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Deferred Income Taxes	21.16%	0.00%
(6)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post-Retirement Liability	1.09%	0.00%
(7)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Prepaid Pension Asset	-7.27%	0.00%
(8)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post 1970 ITC	0.03%	8.30%
(9)	(2)+(3)+(4)+(5)+(6)+(7)+(8)	Rate of Return (ROE = 9.975%)		6.62%
		2) Calculate Revenue Requirement Impact at the Propose ROE		
(10)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Original Cost Rate Base (\$000)		\$ 4,113,446
(11)	= (9)	Rate of Return (ROE = 9.975%)		6.62%
(12)	(10) x (11)	Income Requirement (ROE = 9.975%)		\$ 272,310
(13)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	IPL Proposed Income Requirement (\$000)		\$ 288,764
(14)	(13) - (12)	Difference in Income Requirement (\$000)		\$ 16,454
(15)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Conversion Factor		0.7431
(16)	(14) x (15)	Difference in Revenue Requirement (\$000)		\$ 22,142
(17)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Requested Revenue Requirement Increase (\$000)		\$ 111,386
(18)	(16) / (17)	Percent of Increase from ROE Increase		19.9%

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
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OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT ~~GWT~~SWC-3 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Washington	Avista Corp.	UE-150204	1/6/2016	V	9.50%
Arkansas	Entergy Arkansas Inc.	15-015-U	2/13/2016	V	9.75%
Indiana	Indianapolis Power & Light Co.	44576	3/16/2016	V	9.85%
Massachusetts	Fitchburg Gas & Electric Light	15-80	4/29/2016	D	9.80%
Maryland	Baltimore Gas and Electric Co.	9406	6/3/2016	D	9.75%
New Mexico	El Paso Electric Co.	15-00127-UT	6/8/2016	V	9.48%
New York	NY State Electric & Gas Corp.	15-E-0283	6/15/2016	D	9.00%
New York	Rochester Gas & Electric Corp.	15-E-0285	6/15/2016	D	9.00%
Indiana	Northern Indiana Public Service Co.	44688	7/18/2016	V	9.98%
Tennessee	Kingsport Power Company	16-00001	8/9/2016	V	9.85%
Arizona	UNS Electric Inc.	E-04204A-15-0142	8/18/2016	V	9.50%
New Jersey	Atlantic City Electric Co.	ER-16030252	8/24/2016	D	9.75%
Washington	PacifiCorp	UE-152253	9/1/2016	V	9.50%
Michigan	Upper Peninsula Power Co.	U-17895	9/8/2016	V	10.00%
New Mexico	Public Service Co. of NM	15-00127-UT	9/28/2016	V	9.58%
Massachusetts	Massachusetts Electric Co.	15-155	9/30/2016	D	9.90%
Wisconsin	Madison Gas and Electric Co.	3270-UR-121	11/9/2016	V	9.80%
Oklahoma	Public Service Company of OK	PUD 201500208	11/10/2016	V	9.50%
Maryland	Potomac Electric Power Co.	9418	11/15/2016	D	9.55%
Wisconsin	Wisconsin Power and Light Co	6680-UR-120	11/18/2016	V	10.00%
Florida	Florida Power & Light Co.	160021-EI	11/29/2016	V	10.55%
California	Liberty Utilities CalPeco	A15-05-008	12/1/2016	V	10.00%
Illinois	Ameren Illinois	16-0262	12/6/2016	D	8.64%
Illinois	Commonwealth Edison Co.	16-0259	12/6/2016	D	8.64%
South Carolina	Duke Energy Progress Inc.	2016-227-E	12/7/2016	V	10.10%
New Jersey	Jersey Central Power & Light Co.	ER-16040383	12/12/2016	D	9.60%
Connecticut	United Illuminating Co.	16-06-04	12/14/2016	D	9.10%
Colorado	Black Hills Colorado Electric	16AL-0326E	12/19/2016	V	9.37%
Maine	Emera Maine	2015-00360	12/19/2016	D	9.00%
North Carolina	Virginia Electric & Power Co.	E-22 Sub 532	12/22/2016	V	9.90%
Nevada	Sierra Pacific Power Co.	16-06006	12/22/2016	V	9.60%
Idaho	Avista Corp.	AVU-E-16-03	12/28/2016	V	9.50%
Wyoming	MDU Resources Group Inc.	2004-117-ER-16	1/18/2017	V	9.45%
New York	Consolidated Edison Co. of NY	16-E-0060	1/24/2017	D	9.00%
Michigan	DTE Electric Co.	U-18014	1/31/2017	V	10.10%
Maryland	Delmarva Power & Light Co.	9424	2/15/2017	D	9.60%
New Jersey	Rockland Electric Company	ER-16050428	2/22/2017	D	9.60%
Arizona	Tucson Electric Power Co.	E-01933A-15-0322	2/24/2017	V	9.75%
Michigan	Consumers Energy Co.	U-17990	2/28/2017	V	10.10%
Minnesota	Otter Tail Power Co.	E-017/GR-15-1033	3/2/2017	V	9.41%
Oklahoma	Oklahoma Gas & Electric Co.	PUD 201500273	3/20/2017	V	9.50%
Florida	Gulf Power Co.	160186-EI	4/4/2017	V	10.25%
New Hampshire	Liberty Utilities Granite St	DE-16-383	4/12/2017	D	9.40%
New Hampshire	Unitil Energy Systems Inc.	DE-16-384	4/20/2017	D	9.50%
Missouri	Kansas City Power & Light	ER-2016-0285	5/3/2017	V	9.50%
Minnesota	Northern States Power Co.	E-022/GR-15-826	5/11/2017	V	9.20%
Arkansas	Oklahoma Gas & Electric Co.	16-052-U	5/18/2017	V	9.50%
Delaware	Delmarva Power & Light Co.	16-0649	5/23/2017	D	9.70%
North Dakota	MDU Resources Group Inc.	PU-16-666	6/16/2017	V	9.65%
Kentucky	Kentucky Utilities Co.	2016-00370	6/22/2017	V	9.70%
Kentucky	Louisville Gas & Electric Co.	2016-00371	6/22/2017	V	9.70%
District of Columbia	Potomac Electric Power Co.	FC-1139	7/24/2017	D	9.50%
Arizona	Arizona Public Service Co.	E-01345A-16-0036	8/15/2017	V	10.00%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
New Jersey	Atlantic City Electric Co.	D-ER-17030308	9/22/2017	D	9.60%
Texas	Oncor Electric Delivery Co.	45957	9/28/2017	D	9.80%
Maryland	Potomac Electric Power Co.	9443	10/20/2017	D	9.50%
California	Pacific Gas & Electric Co.	Advice No. 5148-E	10/26/2017	V	10.25%
California	San Diego Gas & Electric Co.	Advice No. 3120-E	10/26/2017	V	10.20%
California	Southern California Edison Co.	Advice No. 3665-E	10/26/2017	V	10.30%
Florida	Tampa Electric Co.	20170210-EI	11/6/2017	V	10.25%
Alaska	Alaska Electric Light Power	U-16-086	11/15/2017	V	11.95%
Massachusetts	NSTAR Electric Co.	17-05	11/30/2017	D	10.00%
Massachusetts	Western Massachusetts Electric	17-05	11/30/2017	D	10.00%
Washington	Puget Sound Energy Inc.	UE-170033	12/5/2017	V	9.50%
Illinois	Ameren Illinois	17-0197	12/6/2017	D	8.40%
Illinois	Commonwealth Edison Co.	17-0196	12/6/2017	D	8.40%
Wisconsin	Northern States Power Co. - WI	D-4220-UR-123	12/7/2017	V	9.80%
Texas	El Paso Electric Co.	46831	12/14/2017	V	9.65%
Texas	Southwestern Electric Power Co.	46449	12/14/2017	V	9.60%
Oregon	Portland General Electric Co.	UE 319	12/18/2017	V	9.50%
New Mexico	Public Service Co. of NM	16-00276-UT	12/20/2017	V	9.58%
Idaho	Avista Corp.	AVU-E-17-01	12/28/2017	V	9.50%
Nevada	Nevada Power Co.	17-06003	12/29/2017	V	9.40%
Vermont	Green Mountain Power Corp	17-3112-INV	12/21/2017	V	9.10%
Kentucky	Kentucky Power Co.	C-2017-00179	1/18/2018	V	9.70%
Oklahoma	Public Service Co. of OK	Ca-PUD201700151	1/31/2018	V	9.30%
Iowa	Interstate Power & Light Co.	D-RPU-2017-0001	2/2/2018	V	9.98%
North Carolina	Duke Energy Progress Inc.	D-E-2, Sub 1142	2/23/2018	V	9.90%
Minnesota	ALLETE (Minnesota Power)	D-E-015/GR-16-664	3/12/2018	V	9.25%
New York	Niagara Mohawk Power Corp.	C-17-E-0238	3/15/2018	D	9.00%
Michigan	Consumers Energy Co.	C-U-18322	3/29/2018	V	10.00%
Connecticut	Connecticut Light and Power	D-17-10-46	4/18/2018	D	9.25%
Michigan	DTE Electric Co.	C-U-18255	4/18/2018	V	10.00%
Washington	Avista Corp.	D-UE-170485	4/26/2018	V	9.50%
Indiana	Indiana Michigan Power Co.	Ca-44967	5/30/2018	V	9.95%
Maryland	Potomac Electric Power Co.	C-9472	5/31/2018	D	9.50%
New York	Central Hudson Gas & Electric	C-17-E-0459	6/14/2018	D	8.80%
North Carolina	Duke Energy Carolinas LLC	D-E-7, Sub 1146	6/22/2018	V	9.90%
Maine	Emera Maine	D-2017-00198	6/28/2018	D	9.35%
Hawaii	Hawaii Electric Light Co	D-2015-0170	6/29/2018	V	9.50%
District of Columbia	Potomac Electric Power Co.	FC-1150	8/8/2018	D	9.53%
Delaware	Delmarva Power & Light Co.	D-17-0977	8/21/2018	D	9.70%
Rhode Island	Narragansett Electric Co.	D-4770 (electric)	8/24/2018	D	9.28%
New Mexico	Southwestern Public Service Co	C-17-00255-UT	9/5/2018	V	9.10%
Wisconsin	Wisconsin Power and Light Co	D-6680-UR-121 (Elec)	9/14/2018	V	10.00%
Wisconsin	Madison Gas and Electric Co.	D-3270-UR-122 (Elec)	9/20/2018	V	9.80%
North Dakota	Otter Tail Power Co.	C-PU-17-398	9/26/2018	V	9.77%
Ohio	Dayton Power and Light Co.	C-15-1830-EL-AIR	9/26/2018	D	9.999% *
Kansas	Westar Energy Inc.	D-18-WSEE-328-RTS	9/27/2018	V	9.30%
Pennsylvania	UGI Utilities Inc.	D-R-2017-2640058	10/4/2018	D	9.85%
New Jersey	Public Service Electric Gas	D-ER18010029	10/29/2018	D	9.60%
Indiana	Indianapolis Power & Light Co.	Ca-45029	10/31/2018	V	9.99%
Illinois	Ameren Illinois	D-18-0807	11/1/2018	D	8.69%
Illinois	Commonwealth Edison Co.	D-18-0808	12/4/2018	D	8.69%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Kansas	Kansas City Power & Light	D-18-KCPE-480-RTS	12/13/2018	V	9.30%
Oregon	Portland General Electric Co.	D-UE-335	12/14/2018	V	9.50%
Ohio	Duke Energy Ohio Inc.	C-17-0032-EL-AIR	12/19/2018	D	9.84%
Texas	Texas-New Mexico Power Co.	D-48401	12/20/2018	D	9.65%
Wisconsin	Madison Gas and Electric Co.	D-3270-UR-122 (Elec)	12/20/2018	V	9.80%
Vermont	Green Mountain Power Corp.	C-18-0974-TF	12/21/2018	D	9.30%
Michigan	Consumers Energy Co.	C-U-20134	1/9/2019	V	10.00%
Entire Period					
# of Decisions		111			
Average (All Utilities)					9.61%
Average (Distribution Only)					9.38%
Average (Vertically Integrated Only)					9.76%
Median					9.60%
Minimum					8.40%
Maximum					11.95%
2016					
# of Decisions		32			
Average (All Utilities)					9.60%
Average (Distribution Only)					9.31%
Average (Distribution Only, exc. IL FRP)					9.45%
Average (Vertically Integrated Only)					9.77%
2017					
# of Decisions		42			
Average (All Utilities)					9.68%
Average (Distribution Only)					9.43%
Average (Distribution Only, exc. IL FRP)					9.61%
Average (Vertically Integrated Only)					9.80%
2018 & 2019					
# of Decisions		37			
Average (All Utilities)					9.56%
Average (Distribution Only)					9.38%
Average (Distribution Only, exc. IL FRP)					9.47%
Average (Vertically Integrated Only)					9.69%

Source: SNL Financial LC, January 3, 2019

* Due to Rounding, the ROE Award is reported as 10.00 on the SNL Website.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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EXHIBIT ~~GWT~~SWC-4 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE vs 9.69%

(1)	Petitioner's Exh No. 4, Att. 4-A-S2	NIPSCO Requested Rate of Return on Total Company Capitalization		7.02%
		1) Calculate Rate of Return Using ROE = 9.69%		
		Capital Component	Percentage of Total	Cost
				Weighted Cost
(2)	=9.975%	Common Equity	47.86%	9.69%
(3)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Long-Term Debt	35.94%	4.97%
(4)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Customer Deposits	1.19%	4.91%
(5)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Deferred Income Taxes	21.16%	0.00%
(6)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post-Retirement Liability	1.09%	0.00%
(7)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Prepaid Pension Asset	-7.27%	0.00%
(8)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post 1970 ITC	0.03%	8.30%
(9)	(2)+(3)+(4)+(5)+(6)+(7)+(8)	Rate of Return (ROE = 9.975%)		6.49%
		2) Calculate Revenue Requirement Impact at the Propose ROE		
(10)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Original Cost Rate Base (\$000)		\$ 4,113,446
(11)	= (9)	Rate of Return (ROE = 9.7%)		6.49%
(12)	(10) x (11)	Income Requirement (ROE = 9.7%)		\$ 266,963
(13)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	NIPSCO Proposed Income Requirement (\$000)		\$ 288,764
(14)	(13) - (12)	Difference in Income Requirement (\$000)		\$ 21,801
(15)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Conversion Factor		0.7431
(16)	(14) x (15)	Difference in Revenue Requirement (\$000)		\$ 29,338
(17)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Requested Revenue Requirement Increase (\$000)		\$ 111,386
(18)	(16) / (17)	Percent of Increase from ROE Increase		26.3%

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EXHIBIT ~~GWT~~SWC-5 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Comparison of Off-Peak Service Characteristics - 2015 Rate Case to Current Case

	2015 Rate Case	Current Case	Difference	Percent
(1) Customer Count	143	184	41	29%
(2) Total 4CP	120,952 kW	183,833 kW		
(3) Average Customer 4CP	846 kW	999 kW	153	18%
(4) Total NCP	119,884 kW	191,238 kW		
(5) Average Customer NCP	838 kW	1,039 kW	201	24%
(6) kW Billing Determinants	1,542,427 kW	1,852,987 kW		
(7) Average kW Billing Determinants	10,786 kW	10,071 kW	(716)	-7%
(8) kWh Sales	871,580,555 kWh	1,042,183,440 kWh		
(9) Average kWh Sales	6,094,969 kWh	5,664,040 kWh	(430,928)	-7%

Sources:

Cause No. 44688, NIPSCO Class Cost of Service Study, Allocation Factors
 Cause No. 45159, NIPSCO Class Cost of Service Study, Allocation Factors

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EXHIBIT ~~GWT~~SWC-6 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Summary of Rate 726/826 Class Load Profile Data – 2015 Rate Case and Current Case

2015 Rate Case						2018 Rate Case					
	CP Date	CP Time	CP (kW)	NCP (kW)	Total kWh	CP Date	CP Time	CP (kW)	NCP (kW)	Total kWh	
1	1/7/15	1900	99,822	100,729	69,827,040	1/5/17	1900	134,265	137,291	94,961,124	
2	2/20/15	1100	100,250	101,912	64,369,064	2/10/17	900	145,162	154,277	94,639,359	
3	3/5/15	1100	98,625	101,368	70,792,190	3/13/17	1000	138,026	146,418	97,596,676	
4	4/4/14	1000	94,850	101,505	67,158,868	4/7/17	800	135,194	158,183	99,057,766	
5	5/27/14	1600	103,906	109,534	71,089,889	5/18/17	1400	148,911	151,280	96,773,964	
6	6/30/14	1600	114,268	115,116	73,185,944	6/12/17	1500	173,130	178,021	109,982,634	
7	7/22/14	1600	118,135	118,700	76,572,415	7/6/17	1500	171,731	177,946	114,835,546	
8	8/25/14	1200	117,442	117,442	78,385,652	8/21/17	1600	170,095	172,541	111,484,082	
9	9/5/14	1400	116,488	117,135	72,594,225	9/21/17	1400	189,378	189,861	115,075,961	
10	10/3/14	1000	98,562	106,497	70,983,264	10/9/17	1500	155,445	160,163	107,171,948	
11	11/20/14	1800	100,079	102,498	67,231,730	11/10/17	1000	146,960	152,744	101,478,451	
12	12/1/14	1900	97,747	100,261	68,084,161	12/8/17	1000	138,611	143,130	96,046,092	
4 CP			118,700					176,084			
Total				1,292,697	850,274,442				1,921,855	1,239,103,603	

Source:

Walmart Request 1-001 Attachment A

STATE OF INDIANA

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EXHIBIT ~~GWT~~SWC-7 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Walmart Estimated Billing Quantities

	2015 Rate Case	Walmart Estimate
(1) Customer Count	143	184
(2) Total NCP	119,884 kW	191,238 kW
(3) Sum of Monthly NCP	1,292,697 kW	1,921,855 kW
(4) kW Billing Determinants	1,542,427 kW	2,293,129 kW
(5) Diversity Factor	1.19 kW	1.19 kW
(6) kWh Sales	871,580,555 kWh	1,270,152,968 kWh
(7) Load Profile kWh	850,274,442 kWh	1,239,103,603 kWh
(8) Ratio of kWh Sales to Load Profile kWh	0.98	0.98

Sources:

Cause No. 44688, NIPSCO Class Cost of Service Study, Allocation Factors
Exhibit ~~GWT~~SWC-6

STATE OF INDIANA

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EXHIBIT ~~GWT~~SWC-8 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Current Rate Revenue Using Walmart Billing Quantities

		Company Calculation			Walmart Calculation		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 26.30	\$ 11,039,662	441,600	\$ 26.30	\$ 11,614,080
(3)	Next 500 kW	566,503	\$ 25.30	\$ 14,332,526	702,560	\$ 25.30	\$ 17,774,768
(4)	Next 1,300 kW	499,968	\$ 24.30	\$ 12,149,222	620,045	\$ 24.30	\$ 15,067,094
(5)	Over 2,000 kW	362,815	\$ 23.80	\$ 8,634,997	528,924	\$ 23.80	\$ 12,588,391
(6)		1,849,045		\$ 46,156,407	2,293,129		\$ 57,044,333
	Billed kWh						
(7)		777,840,216	0.038622	\$ 30,041,745	965,254,500	0.038622	\$ 37,280,059
(8)		245,699,232	0.038610	\$ 9,486,447	304,898,467	0.038610	\$ 11,772,130
(9)		1,023,539,449		\$ 39,528,192	1,270,152,967		\$ 49,052,189
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 85,024,674			\$ 105,436,597
(12)	Total Riders			\$ 10,249,111			\$ 10,249,111
(12)	Total Other Adjustments			\$ (5,032,824)			\$ (5,032,824)
(12)	Total Revenue			\$ 90,240,961			\$ 110,652,884

Difference \$ 20,411,923

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EXHIBIT ~~GWT~~SWC-9 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Company and Walmart Rate Design

		Company Rate Design			Walmart Rate Design		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 28.99	\$ 12,168,813	441,600	\$ 28.99	\$ 12,801,984
(3)	Next 500 kW	566,503	\$ 27.89	\$ 15,799,769	701,065	\$ 27.89	\$ 19,552,703
(4)	Next 1,300 kW	499,968	\$ 26.78	\$ 13,389,143	618,726	\$ 26.78	\$ 16,569,482
(5)	Over 2,000 kW	366,757	\$ 26.23	\$ 9,620,036	531,738	\$ 26.23	\$ 13,947,488
(6)		1,852,987		\$ 50,977,761	2,293,129		\$ 62,871,657
(8)	Billed kWh	1,042,183,440	\$ 0.04925	\$ 51,327,534	1,270,152,967	0.03105	\$ 39,433,639
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 101,645,370			\$ 101,645,370
(12)	Difference						\$ -

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EXHIBIT ~~GWT~~SWC-10 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Company and Walmart Proposed Rate Revenues

		Company Rate Design			Walmart Rate Design		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 28.99	\$ 12,168,813	441,600	\$ 28.99	\$ 12,801,984
(3)	Next 500 kW	566,503	\$ 27.89	\$ 15,799,769	701,065	\$ 27.89	\$ 19,552,703
(4)	Next 1,300 kW	499,968	\$ 26.78	\$ 13,389,143	618,726	\$ 26.78	\$ 16,569,482
(5)	Over 2,000 kW	366,757	\$ 26.23	\$ 9,620,036	531,738	\$ 26.23	\$ 13,947,488
(6)		1,852,987		\$ 50,977,761	2,293,129		\$ 62,871,657
(8)	Billed kWh	1,042,183,440	\$ 0.04925	\$ 51,327,534	1,270,152,967	0.04925	\$ 62,555,034
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 101,645,370			\$ 124,766,765
(12)	Difference						\$ 23,121,395

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EXHIBIT ~~GWT~~SWC-11 OF

~~GREGORY W. TILLMAN~~STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Cause No. 45159
Northern Indiana Public Service Company LLC's
Objections and Responses to
Walmart Inc.'s Set No. 1

Walmart Request 1-011:

Please refer to the Direct Testimony of Paul S. Kelly at page 8, lines 3 – 8. With respect to the expectation that five large industrial will take 184 MW of firm service, please provide the following data.

- a. What is NIPSCO's current capacity requirement?
- b. What is NIPSCO's current capacity requirement associated with the five large industrial customers?
- c. If the five large industrial customers take 184 MW of firm service, what is the expected change in NIPSCO's capacity requirement?
- d. What is the current capacity requirement for all remaining customers that are not expected to take service under Rate 831?
- e. If the five large industrial customers take 184 MW of firm service, what is the expected change to the capacity requirement for all remaining customers that are not expected to take service under Rate 831?

Objections:

NIPSCO objects to this Request on the grounds and to the extent that this Request solicits an analysis, calculation or compilation which has not already been performed and which NIPSCO objects to performing.

Response:

Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

- a) NIPSCO's current Planning Reserve Margin Requirements or PRMR for MISO's planning year 2018-2019 is 3,150 MWs.
- b) NIPSCO currently does not perform an individual capacity requirement study to determine individual customer's respective PRMR, nor has an analysis been performed on those five large industrial customers.
- c) Please see response b. However, it should be noted that an individual industrial customer's firm service election will not affect their capacity requirement.

Cause No. 45159
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- d) Please see response b & c.
- e) Please see response b & c.

VERIFICATION

I, ~~Gregory W. Tillman~~Steve W. Chriss, ~~Senior Manager~~Director, ~~Energy Regulatory~~
~~Analysis~~Energy Services for Walmart Inc., affirm under penalties for perjury that the foregoing
Direct Testimony and Exhibits are true to the best of my knowledge, information, and belief.

~~Gregory W. Tillman~~Steve W. Chriss

Date

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

VERIFIED DIRECT TESTIMONY AND EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Filed: June 11, 2019

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Exhibits

- Exhibit SWC-1 – Witness Qualifications Statement
- Exhibit SWC-2 – Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE Increase
- Exhibit SWC-3 – Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present
- Exhibit SWC-4 – Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE vs 9.69%
- Exhibit SWC-5 – Comparison of Off-Peak Service Characteristics - 2015 Rate Case to Current Case
- Exhibit SWC-6 – Summary of Rate 726/826 Class Load Profile Data – 2015 Rate Case and Current Case
- Exhibit SWC-7 – Walmart Estimated Billing Quantities
- Exhibit SWC-8 – Calculation of Company and Walmart Current Rate Revenue
- Exhibit SWC-9 – Calculation of Company and Walmart Rate Design
- Exhibit SWC-10— Calculation of Company and Walmart Proposed Rate Revenues
- Exhibit SWC-11— Northern Indiana Public Service Company LLC's Response to Walmart Inc.'s Set No. 1, Walmart Data Request 1-011

1 ***Introduction***

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

3 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville,
4 AR 72716-5530. I am employed by Walmart Inc. as Director, Energy Services.

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

6 A. I am testifying on behalf of Walmart Inc. ("Walmart").

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

8 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State
9 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the
10 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My
11 duties included research and analysis on domestic and international energy and
12 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility
13 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties
14 included appearing as a witness for PUC Staff in electric, natural gas, and
15 telecommunications dockets. I joined the energy department at Walmart in July
16 2007 as Manager, State Rate Proceedings. I was promoted to Senior Manager,
17 Energy Regulatory Analysis, in June 2011. I was promoted to my current position in
18 October 2016, and the position was re-titled in October 2018. My Witness
19 Qualifications Statement is included herein as Exhibit SWC-1.

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE INDIANA UTILITY**
2 **REGULATORY COMMISSION ("IURC" OR "COMMISSION")?**

3 A. Yes. I submitted testimony in Cause Nos. 43374, 43580, 44688.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
5 **REGULATORY COMMISSIONS?**

6 A. Yes. I have submitted testimony in over 190 proceedings before 38 other utility
7 regulatory commissions. I have also submitted testimony before several Missouri
8 and Kansas House and Senate Committees. My testimony has addressed topics
9 including, but not limited to, cost of service and rate design, return on equity
10 ("ROE"), revenue requirements, ratemaking policy, large customer renewable
11 programs, qualifying facility rates, telecommunications deregulation, resource
12 certification, energy efficiency/demand side management, fuel cost adjustment
13 mechanisms, decoupling, and the collection of cash earnings on construction work in
14 progress. See Exhibit SWC-1.

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

16 A. The purpose of my testimony is to respond to issues related to the Northern Indiana
17 Public Service Company ("NIPSCO" or "Company") rate case filing.

18 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

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

1 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN INDIANA.**

2 A. As shown on Walmart's website, there are 128 retail units and 10 distribution
3 centers in Indiana employing 41,789 associates. During fiscal year ending January
4 2018, Walmart spent \$1.2 billion with 933 Indiana suppliers supporting an additional
5 42,530 jobs.¹

6 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN NIPSCO'S SERVICE**
7 **TERRITORY.**

8 A. Walmart has 14 retail units and related facilities that take electric service from
9 NIPSCO. Primarily, Walmart takes service under the Company's Off-Peak Service
10 ("OPS") Rate.

11

12 ***Summary of Recommendations***

13 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE COMMISSION.**

14 A. My recommendations to the Commission are as follows:

15 1) The Commission should thoroughly and carefully consider the financial impact of
16 a rate increase on customers, paying particular attention to the Company's
17 requested revenue requirement and Return on Equity ("ROE"). Such

¹ <https://corporate.walmart.com/our-story/our-locations#/united-states/indiana>

1 consideration ensures that any increase in the Company's rates reflects the
2 minimum amount necessary to compensate the Company for adequate and
3 reliable service, while also providing NIPSCO an opportunity to earn a reasonable
4 return.

5 2) The Commission should closely examine the Company's proposed revenue
6 requirement increase and the associated ROE, especially when viewed in light of:
7 (1) the customer impact of the resulting revenue requirement increase as
8 discussed above; (2) the use of a forecast test year; and, (3) recent rate case
9 ROEs approved by commissions nationwide.

10 3) The Commission should reject NIPSCO's proposed Cost of Service Study ("COSS")
11 because it contains errors that lead to rates that are not just and reasonable.
12 The proposed COSS reflects energy consumption and billing demand
13 determinant data that is not aligned with the class load profile for the OPS class
14 and possibly other classes. The errors in the OPS class affect the COSS results
15 and rates for all classes. Only through an accurate, verified COSS can the
16 Commission establish just and reasonable rates for all customers served by
17 NIPSCO.

18 4) The Commission must ensure that any policy established through its order in this
19 case is based on accurate and complete evidence. Failure to fully understand
20 the impact of these structural changes while establishing a significant policy does

1 not balance the interests of the utility with the interests of all its customers.
2 Additionally, in the context of this rate case, the Commission must also consider
3 the balance of interests between the Company's five largest industrial customers
4 and the remaining customers.

5 5) The Commission should allocate the authorized revenue increase in a manner
6 that targets and reduces the subsidy burden for all subsidizing classes.
7 Generally, this can be done by ordering an increase to subsidizing classes that is
8 lower than the system average increase coupled with an increase to subsidized
9 classes that is above the system average without causing an unduly burdensome
10 rate increase on any class.

11 6) For the purposes of this docket and assuming accurate billing determinants are
12 used to set prices, Walmart does not oppose the Company's approach to rate
13 design for the OPS class. Again, Walmart reserves its right to address the rate
14 design further when our concerns with the COSS are addressed.

15 7) The Commission should reject Rate 831 because it results in: (1) an unjust shift in
16 cost responsibility from the Company's five largest industrial customers to the
17 remaining customers; (2) the establishment of customer access to the wholesale
18 market which fails to properly assign transition costs to the departing load; and,
19 (3) eligibility requirements that appear to be unduly discriminatory.

1 8) If the Commission determines that immediate action is required to address the
2 concerns expressed by the Company regarding further reduction in firm loads by
3 industrial customers, the Commission should establish a solution, such as that
4 outlined in my testimony, that addresses the immediate concerns while
5 addressing the proposed burden on the remaining customers during the
6 transition to a more permanent solution.

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

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

11 ***NIPSCO Proposed Revenue Increase***

12 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ELECTRIC**
13 **REVENUE REQUIREMENT INCREASE?**

14 A. My understanding is that NIPSCO has requested a gross revenue increase from base
15 rates of approximately \$111.4 million. See Direct Testimony of Jennifer Shikany,
16 p. 89, line 16.

1 **Q. SHOULD THE COMMISSION GENERALLY CONSIDER THE IMPACT OF THE PROPOSED**
2 **RATE INCREASE ON CUSTOMERS IN SETTING THE REVENUE REQUIREMENT AND**
3 **ROE FOR THE COMPANY?**

4 A. Yes. The Commission should balance the interests of the Company with the
5 interests of its customers. To that end, the Commission should thoroughly and
6 carefully consider the financial impact of a rate increase on customers, paying
7 particular attention to the Company's requested revenue requirement and ROE.
8 Such consideration ensures that any increase in the Company's rates reflects the
9 minimum amount necessary to compensate the Company for adequate and reliable
10 service, while also providing NIPSCO an opportunity to earn a reasonable return.

11 ***Return on Equity***

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

13 A. NIPSCO is proposing a ROE of 10.80 percent, based on a range of 10.55 percent to
14 11.05 percent. See Direct Testimony of Vincent V. Rea, p. 5, lines 10-11. This is a
15 proposed increase in the Company's ROE of 82.5 basis points above the currently
16 authorized ROE of 9.975 percent. See Direct Testimony of Michael Hooper, p. 10,
17 line 11.

1 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT OF THE COMPANY'S PROPOSED**
2 **INCREASE IN ROE?**

3 A. The revenue requirement increase due to the proposed 82.5 basis point increase to
4 the authorized ROE is \$22.1 million, or 19.9 percent of the requested base rate
5 revenue increase. *See* Exhibit SWC-2.

6 **Q. ARE YOU CONCERNED THAT THE COMPANY'S PROPOSED ROE IS EXCESSIVE?**

7 A. Yes. I am concerned that the Company's proposed ROE is excessive, especially in
8 light of: (1) the customer impact of the resulting revenue requirement increase as
9 discussed above; (2) the use of a forecast test year; and, (3) recent rate case ROEs
10 approved by commissions nationwide.

11 **Q. GENERALLY, DOES THE USE OF A FORECAST TEST YEAR DECREASE THE COMPANY'S**
12 **BUSINESS RISK?**

13 A. Yes. The use of a forecast test year allows the Company to include the most current
14 information in the rates being charged to customers at the time those rates will be
15 in effect, which reduces the Company's exposure to regulatory lag in cost recovery
16 when compared to the use of a historical test year in setting rates.

1 **National Utility Industry ROE Trends**

2 **Q. IS THE COMPANY'S PROPOSED ROE HIGHER THAN ROES APPROVED BY OTHER**
3 **UTILITY REGULATORY COMMISSIONS?**

4 A. Yes. The ROE proposed by the Company is higher than the average ROE approved by
5 other utility regulatory commissions nationwide in 2016, 2017, 2018, and thus far in
6 2019. *See* Exhibit SWC-3.

7 **Q. WHAT IS YOUR UNDERSTANDING OF THE ROES AWARDED IN RECENT RATE CASES?**

8 A. According to data from SNL Financial², a financial news and reporting company,
9 there have been 111 reported electric utility rate case ROEs authorized by state
10 regulatory commissions for investor-owned electric utilities in 2016, 2017, 2018, and
11 thus far in 2019. *Id.* The average of the reported ROEs in those cases is 9.61
12 percent. The range of reported authorized ROEs for the same period is 8.40 percent
13 to 11.95 percent, and the median authorized ROE is 9.60 percent. *Id.*

² Regulatory Research Associates is part of SNL Financial.

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

5 A. In the group reported by SNL Financial, the average ROE for vertically integrated
6 utilities authorized from 2016 through present is 9.76 percent. Authorized ROEs for
7 vertically integrated utilities over this time period have been relatively stable. *Id.*

8 **Q. PLEASE EXPLAIN.**

9 A. The average ROE authorized for vertically integrated utilities in 2016 was 9.77
10 percent; in 2017 it was 9.80 percent; and since the beginning of 2018 it is 9.69
11 percent. *Id.* As such, the Company's proposed midpoint of 10.80 percent ROE is
12 counter to broader electric industry trends. As shown in Figure 1, the Company's
13 proposed ROE of 10.80 percent would be higher than all ROEs authorized in the U.S.
14 since the beginning of 2016 except the 11.95 percent awarded by the Regulatory
15 Commission of Alaska in 2017.

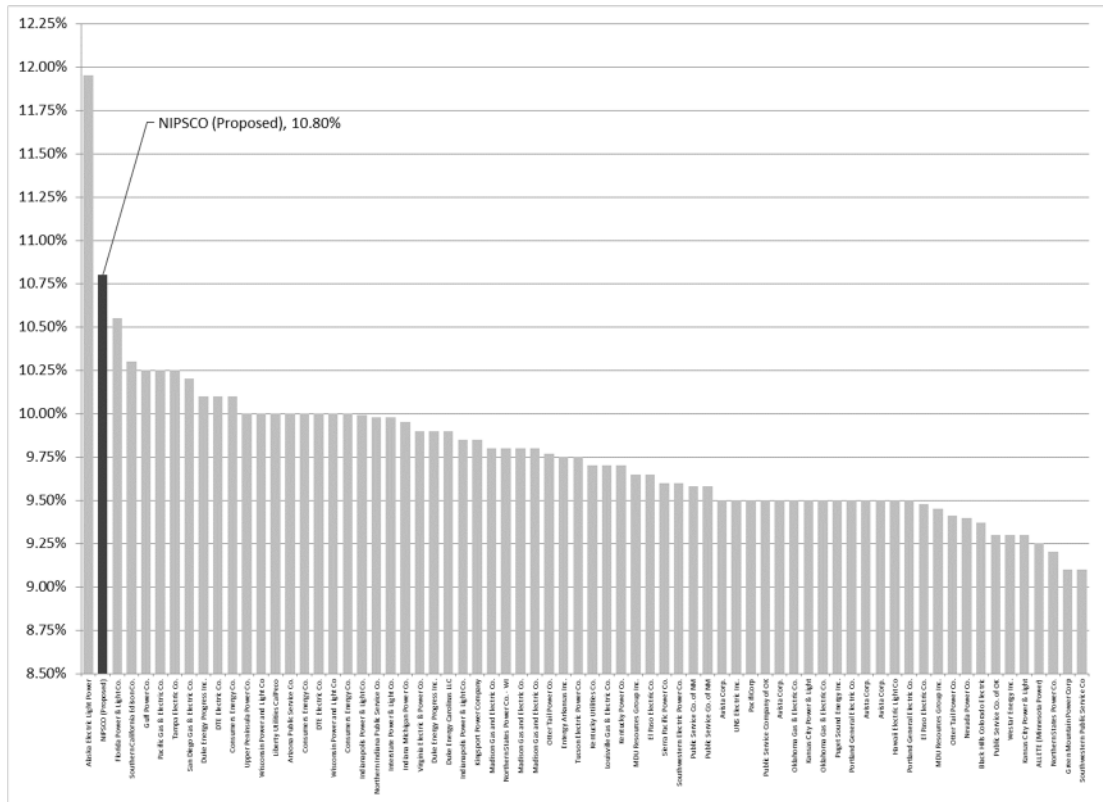


Figure 1. NIPSCO Proposed ROE Versus Authorized ROEs for Vertically Integrated Utilities, 2016 through Present. Source: Exhibit SWC-3.

1 **Q. IS WALMART RECOMMENDING THAT THE COMMISSION BE BOUND BY ROES**
 2 **AUTHORIZED BY OTHER STATE REGULATORY AGENCIES?**

3 **A.** No. Decisions of other state regulatory commissions are not binding on the
 4 Commission. Additionally, each commission considers the specific circumstances in
 5 each case in its determination of the proper ROE. Walmart is providing this
 6 information to illustrate a nationwide electric utility customer's perspective on
 7 industry trends in authorized ROE. In addition to using recent authorized ROEs as a
 8 general gauge of reasonableness for the various cost of equity analyses presented in

1 this case, the Commission should consider how an ROE authorized in this case
2 impacts customers relative to other jurisdictions.

3 **Q. WHAT IS THE REVENUE REQUIREMENT IMPACT IF THE COMMISSION WERE TO**
4 **AWARD AN ROE OF 9.69 PERCENT, THE AVERAGE ROE AWARDED FOR VERTICALLY**
5 **INTEGRATED UTILITIES SINCE THE BEGINNING OF 2018?**

6 A. Authorizing the Company an ROE of 9.69 percent instead of the requested 10.80
7 percent on the original cost rate base would result in a reduction to the requested
8 base revenue requirement increase, inclusive of taxes, of about \$29.3 million. This
9 represents 26.3 percent of the Company's requested base revenue requirement
10 increase. *See Exhibit SWC-4.*

11 **Conclusion**

12 **Q. GENERALLY, WHAT IS YOUR RECOMMENDATION TO THE COMMISSION**
13 **REGARDING THE COMPANY'S PROPOSED REVENUE REQUIREMENT INCREASE AND**
14 **THE ASSOCIATED ROE?**

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

1 ***Cost of Service***

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

4 A. Walmart advocates that rates be set by regulatory agencies based on the utility's
5 cost of service for each rate class. A regulatory policy that supports the fair-cost-
6 apportionment objective of rate-making ensures that rates reflect cost causation,
7 which sends proper price signals to customers and minimizes price distortions.

8 **Q. HOW IS COST CAUSATION DETERMINED IN THE RATE-MAKING PROCESS?**

9 A. In cost of service regulation, the Commission must determine the revenue
10 requirement that the Company is authorized to recover based on prudent costs
11 including a reasonable return on the investment required to provide service. The
12 utility's COSS is an analytic tool commonly used to determine the total cost and
13 equitable assignment of cost responsibility to customers. This is accomplished by
14 identifying, functionalizing, classifying, and allocating the approved costs to
15 customer classes in the manner that customers cause those costs to be incurred.

16 **Q. DOES WALMART HAVE SERIOUS CONCERNS WITH THE UTILITY'S PROPOSED COSS?**

17 A. Yes. Walmart is extremely concerned with the Company's COSS. Based on our
18 analysis of the proposed COSS for the OPS class, Walmart is concerned with the
19 accuracy of the proposed COSS in assigning the overall costs to the customer classes
20 and establishing the cost-basis for the proposed rates. Specifically, Walmart became

1 concerned with certain changes in the characteristics of the OPS class in comparison
2 to Company's COSS filed in Cause No. 44688, NIPSCO's most recent rate case filed in
3 2015 ("2015 Rate Case"). These concerns led to the identification of discrepancies
4 between the OPS class's load characteristics and billing determinants used in the
5 Company's COSS.

6 **Off-Peak Service Customer Characteristics**

7 **Q. ACCORDING TO THE COSS, HOW HAVE THE AVERAGE LOAD CHARACTERISTICS OF**
8 **CUSTOMERS IN THE OFF-PEAK SERVICE CLASS CHANGED SINCE THE 2015 RATE**
9 **CASE?**

10 A. The customer and demand data within the cost of service studies indicate that the
11 average customer's contribution to certain allocators show dramatic changes
12 between the 2015 Rate Case and this case. See Exhibit SWC-5.

- 13 • The Customer allocator shows an increase in the class customer count
14 from 143 customers to 184 customers.
- 15
- 16 • The 4 Coincident Peak ("4CP") allocator used to allocate generation
17 demand costs shows that the average customer contribution to the
18 4CP increased from 846 kW in the 2015 Rate Case to 999 kW in the
19 2018 case — an 18 percent increase.
- 20
- 21 • The Non-coincident Peak ("NCP") allocator shows that the average
22 customer contribution to the class NCP has increased from 838 kW to
23 1,039 kW since the 2015 Rate Case — a 24 percent increase.
- 24
- 25 • In stark contrast to the 4CP and NCP **increases** in the demand
26 allocators described above, the COSS shows a **decrease** in the average

1 billing demand contribution from 10,786 kW to 10,070 kW annually
2 — a 7 percent decrease.

- 3
4 • There is a similar decrease in the average energy sales per customer.
5 The kWh consumption decreased from 6.1 million kWh to 5.7 million
6 kWh per customer — a 7 percent decrease.

7 **Q. WERE THESE CHANGES IN THE OFF-PEAK SERVICE CLASS CHARACTERISTICS**
8 **ADDRESSED IN THE COMPANY'S DIRECT TESTIMONY?**

9 A. To my knowledge, the Company did not address the nature or source of these
10 changes in Direct Testimony.

11 **Q. WHAT CAUSED THE MOST CONCERN WITH THE VALIDITY OF THE COSS?**

12 A. The substantial directional difference in the average customer NCP between the
13 2015 Rate Case and this case compared to the difference in the average demand
14 billing determinants between cases.

15 **Q. WHY DO YOU CONSIDER THE DIRECTIONAL DIFFERENCE IN NCP AND DEMAND**
16 **BILLING DETERMINANTS A STRONG INDICATOR OF INVALID COSS RESULTS?**

17 A. Quite frankly, there is a very low probability that the average customer contribution
18 to the class NCP can **increase** by 24 percent while at the same time the kW billing
19 demand determinants can **decrease** by 7 percent. My experience, as well as basic
20 logic, indicates that if the average customer contribution to NCP increases, then the
21 highly correlated individual customer billing demands would also increase. In fact,
22 while in theory it may be possible for a directional difference of limited magnitude
23 to occur, in my experience, I have never seen such a contemporaneous unrelated

1 change in NCP and billing demand determinants such as that represented in the
2 Company's COSS.

3 **Q. DID YOU REQUEST FURTHER INSIGHT INTO THESE DIFFERENCES?**

4 A. Yes. In the Company's response to Walmart Data Requests, NIPSCO provided data
5 that allowed further insight into the development of the CP, NCP, and billing
6 determinants used in the Company's COSS. Namely, the Company provided load
7 profile data for the OPS class as well as actual billing information for customers
8 within the class.

9 **Q. BASED ON YOUR REVIEW OF THE OFF-PEAK SERVICE CLASS DATA PROVIDED BY**
10 **THE COMPANY, IS WALMART CONCERNED WITH THE CUSTOMER COUNT, CP, AND**
11 **NCP VALUES FOR THE OFF-PEAK SERVICE CLASS USED IN THE COMPANY'S COST OF**
12 **SERVICE?**

13 A. No. Walmart is not concerned with the customer count, CP, and NCP values used in
14 the Company's COSS for the OPS class. My review of the data led me to conclude
15 that the load profile, thus the CP and NCP values represented by the load profile, is
16 reasonable.³ The customer counts used in the COSS are also supported by customer

³ While the CP and NCP data did not match exactly between the COSS and the data request response, it is understood that minor differences were to be expected, based on the Company's response.

1 billing information provided by the Company in response to Walmart Data Requests
2 1-001, 1-002, 1-003, 1-004, and 1-005.

3 **Q. ARE THE BILLING DETERMINANTS USED IN THE COSS AND RATE DESIGN FOR THE**
4 **OFF-PEAK SERVICE CLASS CONSISTENT WITH THE CLASS'S LOAD PROFILE PROVIDED**
5 **BY NIPSCO?**

6 A. No. The Load Profile Data provided by the Company shows the OPS class kWh sales
7 and kW billing demands used in the COSS and rate design are not aligned with the
8 class's load profile used in the COSS.

9 **Q. PLEASE EXPLAIN.**

10 A. My analysis of the OPS class's load profile showed the class's total kWh consumption
11 represented in the load profile is 1,239,103,603 kWh. See Exhibit SWC-6. The value
12 used in the COSS for kWh sales is 1,042,183,440 kWh. See Direct Testimony of J.
13 Stephen Gaske, Attachment 18-E (Revised), p. 3. The kWh sales in the COSS
14 represents an understatement of class kWh sales of about 197 million kWh when
15 compared to the load profile — a shortfall of nearly 17 percent. Further, load
16 diversity⁴ requires the sum of the 12 monthly NCPs to be less than or equal to the

⁴ Load Diversity describes the relationship of the maximum aggregate demand of the system (class NCP) and the sum of the individual demands (customer maximum demand) for the customer loads included in the class or system. A Load Diversity factor greater than 1 indicates that the maximum demands for the customers do

1 annual kW demand billing determinants; however, the sum of the 12 monthly NCPs
2 in the Company's provided class load profile is 1,921,855 kW. See Exhibit SWC-6.
3 This is nearly 70,000 kW greater than the Company's reported billing demand
4 determinant quantity of 1,852,987 kW. See Exhibit SWC-5.

5 **Q. ARE YOU CONCERNED WITH THESE SIGNIFICANT DIFFERENCES IN THE CLASS LOAD**
6 **PROFILE AND THE ENERGY AND DEMAND BILLING QUANTITIES USED FOR THE OFF-**
7 **PEAK SERVICE CLASS?**

8 A. Yes. With respect to the COSS, the class load profiles are the foundation for
9 understanding each class's contribution to the utility's operations. The class load
10 profiles are the basic building blocks of a fair allocation of system costs to the
11 various classes. Matching of the load profile, which guides how costs are
12 apportioned to customers, to the kW and kWh billing quantities, which in turn drive
13 how revenue is collected from customers, is a fundamental requirement for
14 establishing just and reasonable rates. While slight differences may exist,
15 differences of this magnitude lead to significant errors in class cost allocation and
16 revenue recovery.

not occur at the same time. If all customers' maximum demand (*i.e.*, billing demand) occurs simultaneously then the Load Diversity factor equals 1 and the class NCP is necessarily equal to the sum of the customers' maximum demands. A Load Diversity factor cannot be less than 1.

1 **Q. HOW DO UNDERSTATED KWH AND KW BILLING DETERMINANTS IMPACT THE COSS**
2 **AND RATE DESIGN?**

3 A. The understated kWh and kW billing quantities lead to:

4 1) Failure of allocators that rely on these values to reflect the actual
5 relationship between the rate classes and, as a result, assign total costs
6 incorrectly to the various classes;

7 2) Cost allocation errors create an improper analysis of existing and
8 proposed class revenues and rates of return leading to misinformed
9 revenue allocation decisions;

10 3) The use of billing quantities that understate sales quantities in rate
11 design leads to overstated component prices; and,

12 4) Inflated prices applied to the actual sales quantities result in excess
13 revenue.

14 **Inaccurate Cost Allocation**

15 **Q. HAVE YOU ESTIMATED BILLING DETERMINANTS THAT MORE ACCURATELY REFLECT**
16 **THE LOAD PROFILE FOR THE OFF-PEAK SERVICE CLASS?**

17 A. Yes. I estimated billing determinants by applying the billing determinant
18 relationships from the COSS filed in the 2015 Rate Case to the OPS class load profile.

19 Specifically, I estimated the kWh sales for the class using the relationship between

20 the class load profile energy and the kWh sales in the 2015 Rate Case. I used the

21 diversity factor (= Billing Demand/NCP) from the 2015 Rate Case to estimate the

22 Billing Demand. See Exhibit SWC-7.

1 **Q. BASED ON THESE ESTIMATES, BY HOW MUCH ARE THE OFF-PEAK SERVICE CLASS**
2 **KWH SALES AND KW DEMAND BILLING DETERMINANTS UNDERSTATED?**

3 A. As shown in Table 1 below, the company has understated the current rate revenue
4 billing determinants by slightly more than 19 percent. *Id.*

Table 1: Estimated Understatement of Company Billing Determinants

Determinant	Company Value	Walmart Estimate	Difference	Percent Difference
kWh Sales	1,023,539,449	1,270,152,968	246,613,519	19.4%
kW Billing Demand	1,849,045	2,293,129	44,084	19.4%

5 **Q. DOES A DIFFERENCE OF THIS MAGNITUDE IMPACT THE ALLOCATORS USED IN THE**
6 **COSS?**

7 A. Yes. For example, the energy allocator for the OPS class within the Company's filed
8 COSS is 8.6 percent (= 1,042,183,440 kWh/12,096,308,562 kWh). See Direct
9 Testimony of J. Stephen Gaske, Attachment 18-E (Revised), p. 3. Using the Walmart
10 estimates for kWh sales the energy allocator is 10.3 percent (= 1,270,152,968
11 kWh/12,324,278,090 kWh).

12 **Misinformed Revenue Allocation**

13 **Q. DO CHANGES IN THE OFF-PEAK SERVICE CLASS RATE OF RETURN BETWEEN THE**
14 **2015 RATE CASE AND THIS RATE CASE INDICATE A POSSIBLE PROBLEM IN THE**
15 **CLASS COST OF SERVICE?**

16 A. Yes. There is a significant difference in the calculated class rate of return between
17 the 2015 Rate Case and this case relative to the overall system rate of return. At the

1 Company's proposed rates in the 2015 Rate Case, the class rate of return was 8.86
2 percent or an Index Rate of Return ("IRR") of 1.30. See Cause No. 44688, Direct
3 Testimony of J. Stephen Gaske, Attachment 17-C, p. 8. According to the Company's
4 filed COSS in this case, the rate of return at current rates for the OPS class is 3.41
5 percent, or an IRR of 0.68. See Direct Testimony of J. Stephen Gaske, Attachment
6 18-C (Revised), p. 2.

7 **Q. WHAT IS THE PURPOSE OF THE CLASS IRR?**

8 A. IRR is used to represent the accuracy of the class revenues in reflecting the
9 underlying costs of service to each class. An IRR greater than one (1.0) means that
10 the rate class is paying rates in excess of the costs incurred to serve that class, and
11 an IRR less than one (1.0) means that the rate class is paying rates less than the costs
12 incurred to serve that class. As such, when rates are set such that a class does not
13 have an IRR equal to one (1.0) there are inter-class subsidies, as those rate classes
14 with an IRR greater than one (1.0) shoulder some of the revenue responsibility
15 burden for the classes with an IRR less than one (1.0).

16 **Q. BASED ON YOUR EXPERIENCE, DO CHANGES IN IRR OF THIS MAGNITUDE, FROM**
17 **1.30 TO 0.68, TYPICALLY OCCUR BETWEEN RATE CASES FILED THREE YEARS APART?**

18 A. No. In my experience, this magnitude of a change in a class's rate of return relative
19 to the overall rate of return is uncommon, especially in established classes like the
20 Company's OPS class. Again, if this type of change occurs within a class, one would

1 expect that the causes of such a significant change would merit further discussion in
2 the filed case. NIPSCO did not provide any such explanation.

3 **Q. HAVE YOU CALCULATED THE DIFFERENCE IN THE CURRENT RATE REVENUE FROM**
4 **THE COMPANY'S PROPOSED COSS AND THE CURRENT RATE REVENUE BASED ON**
5 **YOUR ESTIMATED BILLING DETERMINANTS?**

6 A. Yes. Using my estimated billing determinants for the class, the current rate revenue
7 for the OPS class is \$20.4 million higher than the current rate revenue included in
8 the Company's filed COSS. See Exhibit SWC-8.

9 **Q. WOULD THE \$20.4 MILLION UNDERSTATEMENT IN CLASS REVENUE IMPACT THE**
10 **IRR AT CURRENT RATES IN THE COSS?**

11 A. Yes. The combination of the understated revenue and the likely changes to cost
12 allocation results in miscalculation of the class and system rates of return. The
13 magnitude of the difference in class rates of return and the resulting IRR is
14 dependent on the magnitude of the changes in the allocators and revenue amounts.

15 **Q. IS IT POSSIBLE FOR THE COMMISSION TO UNDERSTAND THE CURRENT SUBSIDY**
16 **LEVELS BASED ON THE COMPANY'S FILED COSS?**

17 A. No. The use of inaccurate energy sales and billing demand determinant data leads
18 to errors in cost allocation, current rate revenue, and the calculation of the rate of
19 return. These inaccuracies will lead to the calculation of erroneous subsidy
20 amounts. Without accurate information on the underlying subsidies, the

1 Commission is unable to identify the scope of inter-class subsidies and address them
2 appropriately when making revenue allocation decisions.

3 **Q. WHAT IS REVENUE ALLOCATION?**

4 A. Revenue allocation is the assignment of the revenue responsibility to each customer
5 class. A revenue allocation that assigns revenue to each class at the class's cost of
6 service is said to be free of inter-class subsidies.

7 **Q. ARE THERE INSTANCES IN WHICH THE COMMISSION WOULD ASSIGN A DIFFERENT**
8 **REVENUE AMOUNT TO INDIVIDUAL CLASSES THAN IS CALLED FOR WITHIN THE**
9 **COSS, RESULTING IN INTER-CLASS SUBSIDIES?**

10 A. Yes. At times, a regulator may find it necessary to approve a level of revenue
11 requirement to a particular class that differs from the cost responsibility amount
12 determined in the COSS. This is often driven by the need to ensure that customers
13 are not seriously adversely impacted by major changes to the level of rates. Other
14 reasons can include perceived differences in COSS results and reality, relative risks
15 assigned to classes, social goals associated with the role of the prices in a particular
16 jurisdiction, and response to the state of the economy within or external to the
17 regulatory jurisdiction. The Commission may exercise its discretion based on one or
18 more of these concerns to adjust revenue allocation to support policy or advance
19 the public interest; however, these adjustments often result in rates that are not
20 cost-based and, as a result, not just, reasonable, and equitable.

1 **Q. WHAT IS THE COMMISSION'S ULTIMATE GOAL WHEN ALLOCATING REVENUE?**

2 A. To the extent possible, the Commission should eliminate inter-class subsidies
3 through a revenue allocation that reflects the cost of service. If this is not possible in
4 the immediate case, the Commission should establish a clear path to the elimination
5 or reduction of undesired subsidies, continually moving each class closer to their
6 respective cost of service until undesired subsidies are eliminated and price signals,
7 and thus system efficiency, are improved.

8 **Q. GIVEN THE INACCURACIES IN THE COMPANY'S IRR CALCULATIONS CONTAINED IN**
9 **ITS COST OF SERVICE, IS THE ELIMINATION OR TARGETED REDUCTION OF**
10 **SUBSIDIES AN ATTAINABLE GOAL?**

11 A. No. The Commission requires an accurate COSS to understand and effectively
12 address inter-class subsidies. If the Commission does not understand the current
13 subsidy levels it is unlikely that the revenue increase can be allocated to classes in
14 such a way to create meaningful reductions in existing subsidy levels.

15 **Inflated Component Prices**

16 **Q. HOW ARE PRICES DETERMINED IN THE RATE DESIGN PROCESS?**

17 A. Prices are set to recover a class's revenue requirement as accurately as possible.
18 This is accomplished by determining the expected billing quantities for the class,
19 assigning prices that roughly reflect the underlying costs, and fine-tuning the

1 component prices to ensure an accurate collection of the revenue requirement
2 when the rates are approved and implemented.

3 **Q. IF RATE DESIGN INCLUDES UNDERSTATED BILLING DETERMINANTS, WHAT IS THE**
4 **IMPACT ON THE RESULTING PRICES?**

5 A. Since the revenue requirement target is fixed, the understated billing quantities
6 used in rate design will necessarily result in overstated prices. For example, if the
7 revenue requirement is \$100 and the billing quantity is 10 units then a price of \$10
8 (= \$100/10) results in the proper recovery of revenue. If the billing quantity used in
9 price calculation is understated at only 8 units, the price of \$12.50 (= \$100/8 units),
10 which is \$2.50 higher than the price needed to collect \$100 based on the actual sales
11 of 10 units.

12 **Q. ARE THE BILLING QUANTITIES USED IN THE COMPANY'S RATE DESIGN REFLECTIVE**
13 **OF THE SALES EXPECTED WHEN THE APPROVED RATES GO INTO AFFECT?**

14 A. No. Assuming that the class load profile represents the class's contribution to total
15 system requirements, the billing quantities used in price calculation should reflect
16 the previously discussed energy sales and demand billing determinants as estimated
17 and presented in my testimony. See Exhibit SWC-7

1 **Q. USING THE WALMART ESTIMATED BILLING QUANTITIES AND TARGETING THE**
2 **COMPANY'S PROPOSED RATE REVENUE REQUIREMENT BY REDUCING ONLY THE**
3 **ENERGY PRICE, WHAT IS THE DIFFERENCE FOR THE ENERGY PORTION OF THE**
4 **RATE?**

5 A. Targeting the class proposed rate revenue requirement of \$101.6 million by
6 adjusting the energy charge results in a reduction to the energy price from the
7 Company's proposed 4.925 cents per kWh to 3.105 cents per kWh. See Exhibit SWC-
8 9.

9 **Excess Revenue**

10 **Q. HOW WILL THE INFLATED PRICE AFFECT THE COMPANY'S ACTUAL REVENUE WHEN**
11 **THE NEW RATES ARE IMPLEMENTED?**

12 A. Using the inflated prices will create revenue levels above the design targets. The
13 Company's expected sales to the OPS class, represented by the load profile and its
14 corresponding billing quantities, exceed the billing quantities used to calculate
15 prices. The resulting inflated prices will be applied to higher billing quantities than
16 those used in rate design, leading to actual revenues that exceed target revenues.

17 **Q. CONTINUING THE EARLIER EXAMPLE, WHAT IS THE RESULTING EXCESS REVENUE**
18 **COLLECTED BY THE COMPANY?**

19 A. In that example, the price is inflated by \$2.50 using the understated billing quantity.
20 If the actual sales are, in fact, 10 units, then the resulting revenue is \$125 (= 10 x

1 \$12.50) – \$25 higher than the revenue requirement for which the price was
2 designed.

3 **Q. HAVE YOU ESTIMATED THE EXCESS REVENUE USING THE COMPANY'S PROPOSED**
4 **PRICES IF THE ACTUAL SALES ARE ADJUSTED TO REFLECT WALMART'S ESTIMATED**
5 **BILLING QUANTITIES?**

6 A. Yes. The excess revenues are about \$23.1 million using Walmart's estimated billing
7 quantities. See Exhibit SWC-10

8 **Q. ARE YOU AWARE OF ISSUES WITH OTHER RATE CLASSES SIMILAR TO THOSE YOU**
9 **HAVE IDENTIFIED IN THE OFF-PEAK SERVICE CLASS?**

10 A. No. My review was limited to the OPS class, however, the total system load profile
11 provided by the Company shows a total energy that is far greater than the total kWh
12 sales or billing quantity reported in the Company's COSS.⁵ While I do not know its
13 source, the difference indicates possible issues exist in other classes of the
14 Company's COSS.

⁵ The Company's system load profile shows total kWh of 17.5 billion kWh. The Company's total kWh sales in the COSS is 12.1 billion kWh.

1 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION REGARDING THE**
2 **PROPOSED COSS?**

3 A. The Commission should reject NIPSCO's proposed COSS because it contains errors
4 that lead to rates that are not just and reasonable. The proposed COSS reflects
5 energy consumption and billing demand determinant data that is not aligned with
6 the class load profile for the OPS class, and possibly other classes. The errors in the
7 OPS class affect the COSS results and rates for all classes. Only through an accurate
8 verified COSS can the Commission establish just and reasonable rates for all
9 customers served by NIPSCO.

10 **Q. GIVEN THE NATURE OF THIS CASE, SHOULD THE COMMISSION TAKE ADDITIONAL**
11 **PRECAUTIONS WITH RESPECT TO THE ACCURACY AND APPLICABILITY OF THE COSS**
12 **RESULTS THAN MIGHT BE REQUIRED IN A TYPICAL RATE CASE?**

13 A. The accuracy of the COSS is always critical to establishing just and reasonable rates.
14 In this specific case the Company proposes a significant structural change in its
15 operations and the underlying costs of service to a small group of its five largest
16 customers. The Company claims that this is a policy case dealing with a changing
17 marketplace. See Direct Testimony of Paul S. Kelly, p. 2, lines 9-11.

18 The Commission must ensure that any policy established through its order in this
19 case is based on accurate and complete evidence. Failure to fully understand the
20 impact of these structural changes while establishing a significant policy prevents a

1 balancing of the interests of the utility with the interests of all its customers.
2 Additionally, in the context of this rate case, the Commission must also consider the
3 balance of interests between the five largest industrial customers and the remaining
4 customers.

5 ***Revenue Allocation***

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROCESS USED TO ARRIVE AT THE**
7 **COMPANY'S PROPOSED REVENUE ALLOCATION?**

8 A. According to Company witness Michael Hooper, the Company began with its fully
9 allocated cost of service, designed rates for the newly proposed Rate 831 at cost,
10 and then, due to the percentage increases being excessive for the residential rate
11 class, proposed an equal percentage increase of 11.76 percent to all classes except
12 Rate 831. See Direct Testimony of Michael Hooper, p. 21, lines 3-13.

13 **Q. WHAT IS THE COMPANY'S PROPOSED IRR FOR EACH RATE CLASS AT PRESENT**
14 **RATES AND THE COMPANY'S PROPOSED REVENUE ALLOCATION?**

15 A. The present and proposed IRR for each class is shown in Table 2.⁶ See Direct
16 Testimony of J. Stephen Gaske, Attachment 18-C (Revised), pp. 1-3, 7-9.

⁶ These are the Company's proposed values and are not adjusted to reflect the inconsistencies within the COSS discussed within my testimony.

Table 2: Present and Proposed Index Rate of Return

CLASS (Rate Class)	Present		Proposed	
	Return (%)	IRR	Return (%)	IRR
Residential (811)	2.59	0.52	3.37	0.48
C&GS Heat Pump (820)	4.23	0.84	6.28	0.89
GS Small (821)	6.61	1.32	10.48	1.49
Comml SH (822)	7.41	1.48	11.93	1.70
GS Medium (823)	7.40	1.48	12.12	1.73
GS Large (824)	7.77	1.55	13.01	1.85
Metal Mining (825)	6.61	1.32	11.29	1.61
Off-Peak Serv. (826)	3.41	0.68	5.13	0.73
Ind. Pwr Serv. – Large (831)	9.76	1.95	7.02	1.00
Ind. Pwr Serv. – Small (830)	1.96	0.39	7.52	1.07
Muni. Power (841)	5.39	1.08	8.34	1.19
Int WW Pumping (842)	50.01	9.99	88.18	12.56
Railroad (844)	6.74	1.35	10.47	1.49
Street Lighting (850)	2.26	0.45	3.07	0.44
Traffic Lighting (855)	9.48	1.89	15.91	2.27
Dusk-to-Dawn (860)	0.68	0.14	1.70	0.24
Total	4.98	1.00	7.02	1.00

1 **Q. DOES THE COMPANY'S PROPOSED REVENUE ALLOCATION MOVE RATE CLASSES**
2 **CLOSER TO THEIR RESPECTIVE COSTS OF SERVICE?**

3 A. No. Most classes are moved away from their respective cost of service. The
4 Company is proposing to increase the subsidy burden on all subsidizing classes (*i.e.*,
5 those that have an IRR above 1.0) except the newly created Rate 831 class. As such,
6 the Company's proposed revenue allocation is counter to the goal of eliminating or
7 establishing a targeted reduction of subsidies for all classes.

1 **Q. IS WALMART CONCERNED WITH THE COMPANY'S REVENUE ALLOCATION**
2 **METHODOLOGY?**

3 A. Yes. Walmart is concerned that the Company's revenue allocation methodology
4 does not reduce the existing subsidies for all classes. Instead, the Company
5 proposes to eliminate the subsidy on the large industrial class and transfer that
6 subsidy burden to other classes.

7 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION FOR REVENUE**
8 **ALLOCATION?**

9 A. The Commission should allocate the authorized revenue in a manner that targets
10 and reduces the subsidy burden for all subsidizing classes. Generally, this can be
11 done by ordering an increase to subsidizing classes that is lower than the system
12 average increase coupled with an increase to subsidized classes that is above the
13 system average without causing an unduly burdensome rate increase on any class.

14 **Q. HAVE YOU PREPARED A PROPOSED ALLOCATION THAT WOULD PROVIDE A**
15 **TARGETED SUBSIDY REDUCTION FOR ALL CLASSES?**

16 A. No. Due to the COSS concerns discussed earlier, rendering the Company's COSS to
17 be unusable, Walmart is not proposing a specific revenue allocation at this time.
18 However, Walmart may revisit its cost of service recommendation when our
19 concerns with the COSS are addressed and a more accurate assessment of the
20 existing and proposed subsidy burden is available.

1 **Rate Design**

2 **Q. WHAT IS THE COMPANY'S APPROACH TO RATE DESIGN FOR THE OFF-PEAK**
3 **SERVICE RATE?**

4 A. According to Company witness Gaske, the general approach used was to increase
5 demand charges, or the first block of demand charges, to reflect the average
6 percentage increase in margin in this proceeding. The remainder of the increase
7 was assigned to energy charges. See Direct Testimony of J. Stephen Gaske, p. 53,
8 lines 8-14.

9 **Q. IS WALMART OPPOSED TO THE APPROACH USED BY THE COMPANY IN SETTING**
10 **RATES FOR THE OFF-PEAK SERVICE CLASS?**

11 A. For the purposes of this docket and assuming accurate billing determinants are used
12 to set prices, Walmart does not oppose the Company's approach to rate design for
13 the OPS class. Again, Walmart reserves its right to address the rate design further
14 when our concerns with the COSS are addressed.

15 **Rate 831**

16 **Q. IS THE COMPANY PROPOSING TO MODIFY ITS INDUSTRIAL RATE STRUCTURE?**

17 A. Yes. The Company is proposing Rate 831 Market Sensitive Industrial Service
18 Structure ("Rate 831"), a new rate structure targeted to the Company's five largest
19 industrial customers. The remaining industrial customers will be migrated to the
20 newly established Rate 830.

1 **Q. WHAT IS THE COMPANY'S STATED REASONS FOR ITS PROPOSAL TO ESTABLISH**
2 **RATE 831?**

3 A. The Company cites recent losses in load and concerns regarding the potential loss of
4 additional firm loads. The result of further reductions in the load requirement of
5 these customers will, according to the Company, result in decreased revenue and
6 operating margins and shifts in costs to the remaining customer classes. See Direct
7 Testimony of Paul S. Kelly, p. 4, line 11 through p. 5, line 9.

8 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED RATE 831?**

9 A. It is my understanding that the Company has proposed Rate 831 to allow its largest,
10 most sophisticated customers access to market-based rates to serve some portion of
11 their capacity and energy requirements. The rate is described by Company witness
12 Paul S. Kelly. See *id.* at 7, line 8 through p. 10, line 10.

13 **Q. WILL THE PROPOED RATE 831 CREATE A SHIFT OF COSTS TO THE REMAINING**
14 **CUSTOMER CLASSES?**

15 A. As proposed, Rate 831 will create a shift of fixed production costs currently allocated
16 and recovered from the five largest industrial customers to the remainder of the
17 Company's customers. *Id.* at 13, line 16 through p. 14, line 1.

18 **Q. IS WALMART CONCERNED WITH THE COMPANY'S PROPOSED RATE 831?**

19 A. Yes. Walmart is concerned that Rate 831 results in: (1) an unjust shift in cost
20 responsibility from the Company's five largest industrial customers to the remaining

1 customers; (2) the establishment of customer access to the wholesale market which
2 fails to properly assign transition costs to the departing load; and (3) eligibility
3 requirements that appear to be unduly discriminatory.

4 **Q. HOW MUCH OF THE COST ASSOCIATED WITH SERVING THESE FIVE CUSTOMERS IS**
5 **BEING SHIFTED TO OTHER CUSTOMERS?**

6 A. According the Company's response to Data Requests issued by the Office of Utility
7 Consumer Counselor ("OUCC"), and reviewed by Walmart, the shift due to the
8 proposed Rate 831 is approximately \$40.2 million. See NIPSCO's Response to OUCC
9 Data Request 5-010, Attachment A. However, there are other cost shifts being
10 proposed including additional shifts of \$38.5 million and \$5.8 million. *Id.* This brings
11 the total proposed impact on the non-participating customers to approximately
12 \$84.5 million.

13 **Q. GENERALLY, WHICH UTILITY FUNCTION DOES THE COST BEING SHIFTED FROM**
14 **RATE 831 CUSTOMERS ONTO THE REMAINING CUSTOMERS REPRESENT?**

15 A. Generally, these costs represent the production function of the utility's service. The
16 cost shift is the result of reducing the production plant allocator to match the firm
17 level of capacity elected by the five largest industrial customers eligible for Rate 831.
18 Under NIPSCO's proposal, the cost of the remainder of the production capacity
19 currently allocated to those five customers will be allocated to the remaining
20 customer classes.

1 **Q. HOW MUCH FIRM CAPACITY DOES THE COMPANY EXPECT THESE FIVE CUSTOMERS**
2 **TO ELECT UNDER RATE 831?**

3 A. The Company has designed rates to reflect firm service to these customers of
4 approximately 184.6 MW. *See* Direct Testimony of Paul S. Kelly, p. 14, line 8. The
5 Company has also proposed to true rates up to reflect the actual firm service
6 commitments taken by the Rate 831 participants. *Id.* at 15, lines 1-5.

7 **Q. HOW MUCH OF THE COMPANY'S CURRENT CAPACITY IS REQUIRED TO SERVE THE**
8 **REMAINING FIRM SERVICE CUSTOMERS THAT WILL NOT PARTICIPATE IN RATE**
9 **831?**

10 A. According to information received in response to Walmart Data Request 1-011, the
11 Company states that the total capacity requirement is 3,150 MW. However, NIPSCO
12 has not performed the analysis to identify the capacity required to serve the Rate
13 831 participants or non-participants. *See* Exhibit SWC-11

14 **Q. DOES THE IMPLEMENTATION OF RATE 831 CHANGE THE CAPACITY REQUIREMENT**
15 **TO SERVE CUSTOMERS NOT SERVED UNDER THE PROPOSED RATE 831?**

16 A. No. Regardless of the firm service election of the five largest customers that will
17 participate in Rate 831, the capacity requirement to serve the remaining customers
18 will remain unchanged.

1 **Q. DOES THE IMPLEMENTATION OF RATE 831 IMPACT THE CAPACITY REQUIREMENT**
2 **OF THE FIVE LARGEST INDUSTRIAL CUSTOMERS?**

3 A. According to the Company's response to Walmart Data Request 01-011, the capacity
4 requirement will not be affected by the firm service election of the five largest
5 industrial customers expected to participate in Rate 831. *Id.*

6 **Q. GIVEN THE CONSISTENCY IN CAPACITY REQUIREMENTS FOR BOTH PARTICIPANTS**
7 **AND NON-PARTICIPANTS, SHOULD PRODUCTION CAPACITY COSTS BE ALLOCATED**
8 **DIFFERENTLY UNDER THE PROPOSED STRUCTURE OF RATE 831?**

9 A. No. Since the capacity requirements are unaffected by the implementation of Rate
10 831, all customers should continue to be held responsible for the same production
11 capacity costs under the proposed Rate 831. No change to the allocation
12 methodology should occur.

13 **Q. IS THE COMPANY'S PROPOSED SHIFT OF COST RESPONSIBILITY FROM RATE 831**
14 **PARTICIPANTS TO NON-PARTICIPANTS A COST-BASED PROPOSAL?**

15 A. No. The proposed shift in costs from the five largest industrial customers under Rate
16 831 and the remaining customers is not cost based and therefore is not just and
17 reasonable.

1 **Q. DOES THE PROPOSED RATE 831 PROVIDE, IN ESSENCE, WHOLESALE ELECTRIC**
2 **MARKET ACCESS TO THE PARTICIPATING CUSTOMERS?**

3 A. According the Company's description, it appears the proposed Rate 831 is, in its
4 essence, establishing access to the wholesale market to the five largest industrial
5 customers through the Company's status as a market participant. See Direct
6 Testimony of Andrew S. Campbell, p. 9, line 10 through p. 25, line 9.

7 **Q. DOES THE COMPANY'S PROPOSED TRANSITION TO WHOLESALE MARKET ACCESS**
8 **FOR THESE CUSTOMERS PROPERLY ADDRESS THE IMPACT OF THE DEPARTING**
9 **LOAD?**

10 A. No. The Company's proposal does not account for the impact of the departing load
11 on customers that continue to receive full requirements service from the utility. For
12 example, in California, state law requires customers that take service through third-
13 party energy providers to pay a power charge indifference adjustment ("PCIA"). The
14 PCIA or *exit fee* ensures that remaining customers are not left with the responsibility
15 to pay transition costs that should be the responsibility of the departing customers.

16 **Q. ARE THERE OTHER IMPLICATIONS OF THE TRANSITION TO MARKET ACCESS THAT**
17 **THE COMMISSION SHOULD TAKE INTO CONSIDERATION?**

18 A. Absolutely. The Company is proposing that the Commission establish access to the
19 wholesale market in Indiana to only a select few customers that it describes as
20 NIPSCO's largest, most sophisticated customers. If it establishes such a program for

1 only a few large customers, the Commission is precluding other large, sophisticated
2 customers from participating in the wholesale market.

3 **Q. ARE OTHER CUSTOMERS IN THE STATE OF INDIANA SUFFICIENTLY LARGE AND**
4 **SOPHISTICATED TO PARTICIPATE IN THE WHOLESALE MARKET?**

5 A. Yes. Walmart is one such customer. In fact, Texas Retail Energy, a Walmart owned
6 entity is a registered market participant in wholesale markets across the nation and
7 is a participant in the Midcontinent Independent System Operator, Inc. ("MISO")
8 Energy and Operating Reserve Market ("MISO Market").

9 **Q. AS A POLICY MATTER, SHOULD THE COMMISSION CONSIDER THE FAIRNESS OF**
10 **ESTABLISHING A PROGRAM THAT PROVIDES ACCESS TO ONLY A FEW CUSTOMERS**
11 **BASED ON THE NIPSCO'S PROPOSED ELIGIBILITY REQUIREMENTS?**

12 A. While I am not an attorney, the proposed program appears to be unduly
13 discriminatory and should be carefully scrutinized as the Commission considers
14 approval of Rate 831.

15 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION REGARDING THE**
16 **COMPANY'S PROPOSED RATE 831?**

17 A. The Commission should reject Rate 831 because it results in: (1) an unjust shift in
18 cost responsibility from the Company's five largest industrial customers to the
19 remaining customers; (2) the establishment of customer access to the wholesale

1 market which fails to properly assign transition costs to the departing load; and,
2 (3) eligibility requirements that appear to be unduly discriminatory.

3 **Q. IF THE COMMISSION DETERMINES THAT THE THREAT OF REDUCED INDUSTRIAL**
4 **LOAD WARRANTS IMMEDIATE ACTION, WHAT IS WALMART'S**
5 **RECOMMENDATION?**

6 A. If the Commission determines that immediate action is required to address the
7 concerns expressed by the Company regarding further reduction in firm loads by
8 industrial customers, the Commission should establish a solution that addresses the
9 immediate concerns while addressing the proposed burden on the remaining
10 customers during the transition to a more permanent solution.

11 **Q. DOES WALMART HAVE A CONCEPTUAL ALTERNATIVE TO THE COMPANY'S**
12 **PROPOSAL?**

13 A. Yes. Walmart proposes that the Commission:

- 14 1. Establish a cost of service and rate design that reflect full requirement
15 service to all customers including those eligible for Rate 831.
- 16 2. Assign a firm capacity level to each customer eligible for Rate 831 for
17 which the customer is responsible for the cost as a full requirements
18 customer.
- 19 3. To the extent that the customer is willing to relinquish its rights to the
20 firm capacity, allow the Company to make an off-system sale of the
21 customer's assigned and relinquished capacity and credit 100 percent of
22 the proceeds of the sale to the Customer.
- 23 4. When the Company fully retires current production assets (*e.g.*, the
24 proposed retirement of the Schafer coal fired generating units by
25 December 31, 2023, and Michigan City Unit 12 by December 31, 2028)

1 reduce the assigned firm capacity to the participating customers as well
2 as the cost assignment associated with that capacity.

3 5. To the extent that the Commission, in its discretion, desires to provide
4 additional relief to one or more industrial customers, the Commission
5 should establish an industrial subsidy rider, determine the appropriate
6 amount of relief for each customer, and establish just and reasonable
7 allocation of the subsidy to the remaining customers.

8 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

9 A. Yes.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

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OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT SWC-1 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Steve W. Chriss

Walmart Inc.

Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

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

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

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

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001

Louisiana State University

M.S., Agricultural Economics

1997-1998

University of Florida

Graduate Coursework, Agricultural Education and Communication

1997

Texas A&M University

B.S., Agricultural Development

B.S., Horticulture

MEMBERSHIPS

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Renewable Energy Buyers Alliance, Advisory Board

TESTIMONY BEFORE REGULATORY COMMISSIONS

2019

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

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

Nevada Docket No. 18-11016: Re: Application of Sierra Pacific Power Company d/b/a NV Energy, Filed Under Advice No. 614-E, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible

Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

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

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

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

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

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

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

2018

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2015

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2014

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2013

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2011

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

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

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

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

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

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

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

reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

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

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

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

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

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

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

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

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

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

2010

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

2008

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

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

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

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

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

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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

TESTIMONY BEFORE LEGISLATIVE BODIES

2019

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

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

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

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

2018

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

2017

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

2016

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

2014

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

2012

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

2011

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

AFFIDAVITS

2015

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

2011

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

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT SWC-2 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE Increase

(1)	Petitioner's Exh No. 4, Att. 4-A-S2	NIPSCO Requested Rate of Return on Total Company Capitalization		7.02%
		1) Calculate Rate of Return Using ROE = 9.975%		
		Capital Component	Percentage of Total	Cost
				Weighted Cost
(2)	=9.975%	Common Equity	47.86%	9.98%
(3)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Long-Term Debt	35.94%	4.97%
(4)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Customer Deposits	1.19%	4.91%
(5)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Deferred Income Taxes	21.16%	0.00%
(6)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post-Retirement Liability	1.09%	0.00%
(7)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Prepaid Pension Asset	-7.27%	0.00%
(8)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post 1970 ITC	0.03%	8.30%
(9)	(2)+(3)+(4)+(5)+(6)+(7)+(8)	Rate of Return (ROE = 9.975%)		6.62%
		2) Calculate Revenue Requirement Impact at the Propose ROE		
(10)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Original Cost Rate Base (\$000)		\$ 4,113,446
(11)	= (9)	Rate of Return (ROE = 9.975%)		6.62%
(12)	(10) x (11)	Income Requirement (ROE = 9.975%)		\$ 272,310
(13)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	IPL Proposed Income Requirement (\$000)		\$ 288,764
(14)	(13) - (12)	Difference in Income Requirement (\$000)		\$ 16,454
(15)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Conversion Factor		0.7431
(16)	(14) x (15)	Difference in Revenue Requirement (\$000)		\$ 22,142
(17)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Requested Revenue Requirement Increase (\$000)		\$ 111,386
(18)	(16) / (17)	Percent of Increase from ROE Increase		19.9%

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT SWC-3 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Washington	Avista Corp.	UE-150204	1/6/2016	V	9.50%
Arkansas	Entergy Arkansas Inc.	15-015-U	2/13/2016	V	9.75%
Indiana	Indianapolis Power & Light Co.	44576	3/16/2016	V	9.85%
Massachusetts	Fitchburg Gas & Electric Light	15-80	4/29/2016	D	9.80%
Maryland	Baltimore Gas and Electric Co.	9406	6/3/2016	D	9.75%
New Mexico	El Paso Electric Co.	15-00127-UT	6/8/2016	V	9.48%
New York	NY State Electric & Gas Corp.	15-E-0283	6/15/2016	D	9.00%
New York	Rochester Gas & Electric Corp.	15-E-0285	6/15/2016	D	9.00%
Indiana	Northern Indiana Public Service Co.	44688	7/18/2016	V	9.98%
Tennessee	Kingsport Power Company	16-00001	8/9/2016	V	9.85%
Arizona	UNS Electric Inc.	E-04204A-15-0142	8/18/2016	V	9.50%
New Jersey	Atlantic City Electric Co.	ER-16030252	8/24/2016	D	9.75%
Washington	PacifiCorp	UE-152253	9/1/2016	V	9.50%
Michigan	Upper Peninsula Power Co.	U-17895	9/8/2016	V	10.00%
New Mexico	Public Service Co. of NM	15-00127-UT	9/28/2016	V	9.58%
Massachusetts	Massachusetts Electric Co.	15-155	9/30/2016	D	9.90%
Wisconsin	Madison Gas and Electric Co.	3270-UR-121	11/9/2016	V	9.80%
Oklahoma	Public Service Company of OK	PUD 201500208	11/10/2016	V	9.50%
Maryland	Potomac Electric Power Co.	9418	11/15/2016	D	9.55%
Wisconsin	Wisconsin Power and Light Co	6680-UR-120	11/18/2016	V	10.00%
Florida	Florida Power & Light Co.	160021-EI	11/29/2016	V	10.55%
California	Liberty Utilities CalPeco	A15-05-008	12/1/2016	V	10.00%
Illinois	Ameren Illinois	16-0262	12/6/2016	D	8.64%
Illinois	Commonwealth Edison Co.	16-0259	12/6/2016	D	8.64%
South Carolina	Duke Energy Progress Inc.	2016-227-E	12/7/2016	V	10.10%
New Jersey	Jersey Central Power & Light Co.	ER-16040383	12/12/2016	D	9.60%
Connecticut	United Illuminating Co.	16-06-04	12/14/2016	D	9.10%
Colorado	Black Hills Colorado Electric	16AL-0326E	12/19/2016	V	9.37%
Maine	Emera Maine	2015-00360	12/19/2016	D	9.00%
North Carolina	Virginia Electric & Power Co.	E-22 Sub 532	12/22/2016	V	9.90%
Nevada	Sierra Pacific Power Co.	16-06006	12/22/2016	V	9.60%
Idaho	Avista Corp.	AVU-E-16-03	12/28/2016	V	9.50%
Wyoming	MDU Resources Group Inc.	2004-117-ER-16	1/18/2017	V	9.45%
New York	Consolidated Edison Co. of NY	16-E-0060	1/24/2017	D	9.00%
Michigan	DTE Electric Co.	U-18014	1/31/2017	V	10.10%
Maryland	Delmarva Power & Light Co.	9424	2/15/2017	D	9.60%
New Jersey	Rockland Electric Company	ER-16050428	2/22/2017	D	9.60%
Arizona	Tucson Electric Power Co.	E-01933A-15-0322	2/24/2017	V	9.75%
Michigan	Consumers Energy Co.	U-17990	2/28/2017	V	10.10%
Minnesota	Otter Tail Power Co.	E-017/GR-15-1033	3/2/2017	V	9.41%
Oklahoma	Oklahoma Gas & Electric Co.	PUD 201500273	3/20/2017	V	9.50%
Florida	Gulf Power Co.	160186-EI	4/4/2017	V	10.25%
New Hampshire	Liberty Utilities Granite St	DE-16-383	4/12/2017	D	9.40%
New Hampshire	Unitil Energy Systems Inc.	DE-16-384	4/20/2017	D	9.50%
Missouri	Kansas City Power & Light	ER-2016-0285	5/3/2017	V	9.50%
Minnesota	Northern States Power Co.	E-022/GR-15-826	5/11/2017	V	9.20%
Arkansas	Oklahoma Gas & Electric Co.	16-052-U	5/18/2017	V	9.50%
Delaware	Delmarva Power & Light Co.	16-0649	5/23/2017	D	9.70%
North Dakota	MDU Resources Group Inc.	PU-16-666	6/16/2017	V	9.65%
Kentucky	Kentucky Utilities Co.	2016-00370	6/22/2017	V	9.70%
Kentucky	Louisville Gas & Electric Co.	2016-00371	6/22/2017	V	9.70%
District of Columbia	Potomac Electric Power Co.	FC-1139	7/24/2017	D	9.50%
Arizona	Arizona Public Service Co.	E-01345A-16-0036	8/15/2017	V	10.00%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
New Jersey	Atlantic City Electric Co.	D-ER-17030308	9/22/2017	D	9.60%
Texas	Oncor Electric Delivery Co.	45957	9/28/2017	D	9.80%
Maryland	Potomac Electric Power Co.	9443	10/20/2017	D	9.50%
California	Pacific Gas & Electric Co.	Advice No. 5148-E	10/26/2017	V	10.25%
California	San Diego Gas & Electric Co.	Advice No. 3120-E	10/26/2017	V	10.20%
California	Southern California Edison Co.	Advice No. 3665-E	10/26/2017	V	10.30%
Florida	Tampa Electric Co.	20170210-EI	11/6/2017	V	10.25%
Alaska	Alaska Electric Light Power	U-16-086	11/15/2017	V	11.95%
Massachusetts	NSTAR Electric Co.	17-05	11/30/2017	D	10.00%
Massachusetts	Western Massachusetts Electric	17-05	11/30/2017	D	10.00%
Washington	Puget Sound Energy Inc.	UE-170033	12/5/2017	V	9.50%
Illinois	Ameren Illinois	17-0197	12/6/2017	D	8.40%
Illinois	Commonwealth Edison Co.	17-0196	12/6/2017	D	8.40%
Wisconsin	Northern States Power Co. - WI	D-4220-UR-123	12/7/2017	V	9.80%
Texas	El Paso Electric Co.	46831	12/14/2017	V	9.65%
Texas	Southwestern Electric Power Co.	46449	12/14/2017	V	9.60%
Oregon	Portland General Electric Co.	UE 319	12/18/2017	V	9.50%
New Mexico	Public Service Co. of NM	16-00276-UT	12/20/2017	V	9.58%
Idaho	Avista Corp.	AVU-E-17-01	12/28/2017	V	9.50%
Nevada	Nevada Power Co.	17-06003	12/29/2017	V	9.40%
Vermont	Green Mountain Power Corp	17-3112-INV	12/21/2017	V	9.10%
Kentucky	Kentucky Power Co.	C-2017-00179	1/18/2018	V	9.70%
Oklahoma	Public Service Co. of OK	Ca-PUD201700151	1/31/2018	V	9.30%
Iowa	Interstate Power & Light Co.	D-RPU-2017-0001	2/2/2018	V	9.98%
North Carolina	Duke Energy Progress Inc.	D-E-2, Sub 1142	2/23/2018	V	9.90%
Minnesota	ALLETE (Minnesota Power)	D-E-015/GR-16-664	3/12/2018	V	9.25%
New York	Niagara Mohawk Power Corp.	C-17-E-0238	3/15/2018	D	9.00%
Michigan	Consumers Energy Co.	C-U-18322	3/29/2018	V	10.00%
Connecticut	Connecticut Light and Power	D-17-10-46	4/18/2018	D	9.25%
Michigan	DTE Electric Co.	C-U-18255	4/18/2018	V	10.00%
Washington	Avista Corp.	D-UE-170485	4/26/2018	V	9.50%
Indiana	Indiana Michigan Power Co.	Ca-44967	5/30/2018	V	9.95%
Maryland	Potomac Electric Power Co.	C-9472	5/31/2018	D	9.50%
New York	Central Hudson Gas & Electric	C-17-E-0459	6/14/2018	D	8.80%
North Carolina	Duke Energy Carolinas LLC	D-E-7, Sub 1146	6/22/2018	V	9.90%
Maine	Emera Maine	D-2017-00198	6/28/2018	D	9.35%
Hawaii	Hawaii Electric Light Co	D-2015-0170	6/29/2018	V	9.50%
District of Columbia	Potomac Electric Power Co.	FC-1150	8/8/2018	D	9.53%
Delaware	Delmarva Power & Light Co.	D-17-0977	8/21/2018	D	9.70%
Rhode Island	Narragansett Electric Co.	D-4770 (electric)	8/24/2018	D	9.28%
New Mexico	Southwestern Public Service Co	C-17-00255-UT	9/5/2018	V	9.10%
Wisconsin	Wisconsin Power and Light Co	D-6680-UR-121 (Elec)	9/14/2018	V	10.00%
Wisconsin	Madison Gas and Electric Co.	D-3270-UR-122 (Elec)	9/20/2018	V	9.80%
North Dakota	Otter Tail Power Co.	C-PU-17-398	9/26/2018	V	9.77%
Ohio	Dayton Power and Light Co.	C-15-1830-EL-AIR	9/26/2018	D	9.999% *
Kansas	Westar Energy Inc.	D-18-WSEE-328-RTS	9/27/2018	V	9.30%
Pennsylvania	UGI Utilities Inc.	D-R-2017-2640058	10/4/2018	D	9.85%
New Jersey	Public Service Electric Gas	D-ER18010029	10/29/2018	D	9.60%
Indiana	Indianapolis Power & Light Co.	Ca-45029	10/31/2018	V	9.99%
Illinois	Ameren Illinois	D-18-0807	11/1/2018	D	8.69%
Illinois	Commonwealth Edison Co.	D-18-0808	12/4/2018	D	8.69%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2016 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Kansas	Kansas City Power & Light	D-18-KCPE-480-RTS	12/13/2018	V	9.30%
Oregon	Portland General Electric Co.	D-UE-335	12/14/2018	V	9.50%
Ohio	Duke Energy Ohio Inc.	C-17-0032-EL-AIR	12/19/2018	D	9.84%
Texas	Texas-New Mexico Power Co.	D-48401	12/20/2018	D	9.65%
Wisconsin	Madison Gas and Electric Co.	D-3270-UR-122 (Elec)	12/20/2018	V	9.80%
Vermont	Green Mountain Power Corp.	C-18-0974-TF	12/21/2018	D	9.30%
Michigan	Consumers Energy Co.	C-U-20134	1/9/2019	V	10.00%
Entire Period					
# of Decisions		111			
Average (All Utilities)				9.61%	
Average (Distribution Only)				9.38%	
Average (Vertically Integrated Only)				9.76%	
Median				9.60%	
Minimum				8.40%	
Maximum				11.95%	
2016					
# of Decisions		32			
Average (All Utilities)				9.60%	
Average (Distribution Only)				9.31%	
Average (Distribution Only, exc. IL FRP)				9.45%	
Average (Vertically Integrated Only)				9.77%	
2017					
# of Decisions		42			
Average (All Utilities)				9.68%	
Average (Distribution Only)				9.43%	
Average (Distribution Only, exc. IL FRP)				9.61%	
Average (Vertically Integrated Only)				9.80%	
2018 & 2019					
# of Decisions		37			
Average (All Utilities)				9.56%	
Average (Distribution Only)				9.38%	
Average (Distribution Only, exc. IL FRP)				9.47%	
Average (Vertically Integrated Only)				9.69%	

Source: SNL Financial LC, January 3, 2019

* Due to Rounding, the ROE Award is reported as 10.00 on the SNL Website.

STATE OF INDIANA

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EXHIBIT SWC-4 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Revenue Requirement Impact of NIPSCO's Proposed ROE vs 9.69%

(1)	Petitioner's Exh No. 4, Att. 4-A-S2	NIPSCO Requested Rate of Return on Total Company Capitalization		7.02%	
		1) Calculate Rate of Return Using ROE = 9.69%			
		Capital Component	Percentage of Total	Cost	Weighted Cost
(2)	=9.975%	Common Equity	47.86%	9.69%	4.64%
(3)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Long-Term Debt	35.94%	4.97%	1.79%
(4)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Customer Deposits	1.19%	4.91%	0.06%
(5)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Deferred Income Taxes	21.16%	0.00%	0.00%
(6)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post-Retirement Liability	1.09%	0.00%	0.00%
(7)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Prepaid Pension Asset	-7.27%	0.00%	0.00%
(8)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 5	Post 1970 ITC	0.03%	8.30%	0.00%
(9)	(2)+(3)+(4)+(5)+(6)+(7)+(8)	Rate of Return (ROE = 9.975%)			6.49%
		2) Calculate Revenue Requirement Impact at the Propose ROE			
(10)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Original Cost Rate Base (\$000)		\$	4,113,446
(11)	= (9)	Rate of Return (ROE = 9.7%)			6.49%
(12)	(10) x (11)	Income Requirement (ROE = 9.7%)		\$	266,963
(13)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	NIPSCO Proposed Income Requirement (\$000)		\$	288,764
(14)	(13) - (12)	Difference in Income Requirement (\$000)		\$	21,801
(15)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Conversion Factor			0.7431
(16)	(14) x (15)	Difference in Revenue Requirement (\$000)		\$	29,338
(17)	Petitioner's Exh No. 4, Att. 4-A-S2, p. 3	Requested Revenue Requirement Increase (\$000)		\$	111,386
(18)	(16) / (17)	Percent of Increase from ROE Increase			26.3%

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EXHIBIT SWC-5 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Comparison of Off-Peak Service Characteristics - 2015 Rate Case to Current Case

	2015 Rate Case	Current Case	Difference	Percent
(1) Customer Count	143	184	41	29%
(2) Total 4CP	120,952 kW	183,833 kW		
(3) Average Customer 4CP	846 kW	999 kW	153	18%
(4) Total NCP	119,884 kW	191,238 kW		
(5) Average Customer NCP	838 kW	1,039 kW	201	24%
(6) kW Billing Determinants	1,542,427 kW	1,852,987 kW		
(7) Average kW Billing Determinants	10,786 kW	10,071 kW	(716)	-7%
(8) kWh Sales	871,580,555 kWh	1,042,183,440 kWh		
(9) Average kWh Sales	6,094,969 kWh	5,664,040 kWh	(430,928)	-7%

Sources:

Cause No. 44688, NIPSCO Class Cost of Service Study, Allocation Factors
 Cause No. 45159, NIPSCO Class Cost of Service Study, Allocation Factors

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EXHIBIT SWC-6 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Summary of Rate 726/826 Class Load Profile Data – 2015 Rate Case and Current Case

2015 Rate Case						2018 Rate Case					
	CP Date	CP Time	CP (kW)	NCP (kW)	Total kWh	CP Date	CP Time	CP (kW)	NCP (kW)	Total kWh	
1	1/7/15	1900	99,822	100,729	69,827,040	1/5/17	1900	134,265	137,291	94,961,124	
2	2/20/15	1100	100,250	101,912	64,369,064	2/10/17	900	145,162	154,277	94,639,359	
3	3/5/15	1100	98,625	101,368	70,792,190	3/13/17	1000	138,026	146,418	97,596,676	
4	4/4/14	1000	94,850	101,505	67,158,868	4/7/17	800	135,194	158,183	99,057,766	
5	5/27/14	1600	103,906	109,534	71,089,889	5/18/17	1400	148,911	151,280	96,773,964	
6	6/30/14	1600	114,268	115,116	73,185,944	6/12/17	1500	173,130	178,021	109,982,634	
7	7/22/14	1600	118,135	118,700	76,572,415	7/6/17	1500	171,731	177,946	114,835,546	
8	8/25/14	1200	117,442	117,442	78,385,652	8/21/17	1600	170,095	172,541	111,484,082	
9	9/5/14	1400	116,488	117,135	72,594,225	9/21/17	1400	189,378	189,861	115,075,961	
10	10/3/14	1000	98,562	106,497	70,983,264	10/9/17	1500	155,445	160,163	107,171,948	
11	11/20/14	1800	100,079	102,498	67,231,730	11/10/17	1000	146,960	152,744	101,478,451	
12	12/1/14	1900	97,747	100,261	68,084,161	12/8/17	1000	138,611	143,130	96,046,092	
4 CP			118,700					176,084			
Total				1,292,697	850,274,442				1,921,855	1,239,103,603	

Source:

Walmart Request 1-001 Attachment A

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EXHIBIT SWC-7 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Walmart Estimated Billing Quantities

	2015 Rate Case	Walmart Estimate
(1) Customer Count	143	184
(2) Total NCP	119,884 kW	191,238 kW
(3) Sum of Monthly NCP	1,292,697 kW	1,921,855 kW
(4) kW Billing Determinants	1,542,427 kW	2,293,129 kW
(5) Diversity Factor	1.19 kW	1.19 kW
(6) kWh Sales	871,580,555 kWh	1,270,152,968 kWh
(7) Load Profile kWh	850,274,442 kWh	1,239,103,603 kWh
(8) Ratio of kWh Sales to Load Profile kWh	0.98	0.98

Sources:

Cause No. 44688, NIPSCO Class Cost of Service Study, Allocation Factors
Exhibit SWC-6

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EXHIBIT SWC-8 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Current Rate Revenue Using Walmart Billing Quantities

		Company Calculation			Walmart Calculation		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 26.30	\$ 11,039,662	441,600	\$ 26.30	\$ 11,614,080
(3)	Next 500 kW	566,503	\$ 25.30	\$ 14,332,526	702,560	\$ 25.30	\$ 17,774,768
(4)	Next 1,300 kW	499,968	\$ 24.30	\$ 12,149,222	620,045	\$ 24.30	\$ 15,067,094
(5)	Over 2,000 kW	362,815	\$ 23.80	\$ 8,634,997	528,924	\$ 23.80	\$ 12,588,391
(6)		1,849,045		\$ 46,156,407	2,293,129		\$ 57,044,333
	Billed kWh						
(7)		777,840,216	0.038622	\$ 30,041,745	965,254,500	0.038622	\$ 37,280,059
(8)		245,699,232	0.038610	\$ 9,486,447	304,898,467	0.038610	\$ 11,772,130
(9)		1,023,539,449		\$ 39,528,192	1,270,152,967		\$ 49,052,189
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 85,024,674			\$ 105,436,597
(12)	Total Riders			\$ 10,249,111			\$ 10,249,111
(12)	Total Other Adjustments			\$ (5,032,824)			\$ (5,032,824)
(12)	Total Revenue			\$ 90,240,961			\$ 110,652,884

Difference \$ 20,411,923

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EXHIBIT SWC-9 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Company and Walmart Rate Design

		Company Rate Design			Walmart Rate Design		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 28.99	\$ 12,168,813	441,600	\$ 28.99	\$ 12,801,984
(3)	Next 500 kW	566,503	\$ 27.89	\$ 15,799,769	701,065	\$ 27.89	\$ 19,552,703
(4)	Next 1,300 kW	499,968	\$ 26.78	\$ 13,389,143	618,726	\$ 26.78	\$ 16,569,482
(5)	Over 2,000 kW	366,757	\$ 26.23	\$ 9,620,036	531,738	\$ 26.23	\$ 13,947,488
(6)		1,852,987		\$ 50,977,761	2,293,129		\$ 62,871,657
(8)	Billed kWh	1,042,183,440	\$ 0.04925	\$ 51,327,534	1,270,152,967	0.03105	\$ 39,433,639
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 101,645,370			\$ 101,645,370
(12)	Difference						\$ -

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EXHIBIT SWC-10 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Calculation of Company and Walmart Proposed Rate Revenues

		Company Rate Design			Walmart Rate Design		
		kW	Rate	Amount	kW	Rate	Amount
(1)	Billed kW						
(2)	First 200 kW	419,759	\$ 28.99	\$ 12,168,813	441,600	\$ 28.99	\$ 12,801,984
(3)	Next 500 kW	566,503	\$ 27.89	\$ 15,799,769	701,065	\$ 27.89	\$ 19,552,703
(4)	Next 1,300 kW	499,968	\$ 26.78	\$ 13,389,143	618,726	\$ 26.78	\$ 16,569,482
(5)	Over 2,000 kW	366,757	\$ 26.23	\$ 9,620,036	531,738	\$ 26.23	\$ 13,947,488
(6)		1,852,987		\$ 50,977,761	2,293,129		\$ 62,871,657
(8)	Billed kWh	1,042,183,440	\$ 0.04925	\$ 51,327,534	1,270,152,967	0.04925	\$ 62,555,034
(10)	Discounts Billed kW	759,314	\$ (0.72)	\$ (546,706)	759,314	\$ (0.72)	\$ (546,706)
(11)		125,799	\$ (0.90)	\$ (113,219)	125,799	\$ (0.90)	\$ (113,219)
(12)		885,113		\$ (659,925)	885,113		\$ (659,925)
(12)	Off-Peak Service Rate			\$ 101,645,370			\$ 124,766,765
(12)	Difference						\$ 23,121,395

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND.)
CODE §§ 8-1-2-42.7, 8-1-2-61 AND IND. CODE §§ 8-)
1-2.5-6 FOR (1) AUTHORITY TO MODIFY ITS)
RATES AND CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES; (2)) CAUSE NO. 45159
APPROVAL OF NEW SCHEDULES OF RATES)
AND CHARGES, GENERAL RULES AND)
REGULATIONS, AND RIDERS; (3) APPROVAL)
OF REVISED COMMON AND ELECTRIC)
DEPRECIATION RATES APPLICABLE TO ITS)
ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE)
ACCOUNTING RELIEF; AND (5) APPROVAL OF)
A NEW SERVICE STRUCTURE FOR)
INDUSTRIAL RATES.)

EXHIBIT SWC-11 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Cause No. 45159
Northern Indiana Public Service Company LLC's
Objections and Responses to
Walmart Inc.'s Set No. 1

Walmart Request 1-011:

Please refer to the Direct Testimony of Paul S. Kelly at page 8, lines 3 – 8. With respect to the expectation that five large industrial will take 184 MW of firm service, please provide the following data.

- a. What is NIPSCO's current capacity requirement?
- b. What is NIPSCO's current capacity requirement associated with the five large industrial customers?
- c. If the five large industrial customers take 184 MW of firm service, what is the expected change in NIPSCO's capacity requirement?
- d. What is the current capacity requirement for all remaining customers that are not expected to take service under Rate 831?
- e. If the five large industrial customers take 184 MW of firm service, what is the expected change to the capacity requirement for all remaining customers that are not expected to take service under Rate 831?

Objections:

NIPSCO objects to this Request on the grounds and to the extent that this Request solicits an analysis, calculation or compilation which has not already been performed and which NIPSCO objects to performing.

Response:

Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

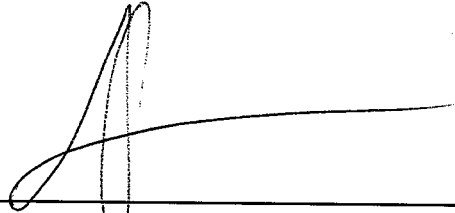
- a) NIPSCO's current Planning Reserve Margin Requirements or PRMR for MISO's planning year 2018-2019 is 3,150 MWs.
- b) NIPSCO currently does not perform an individual capacity requirement study to determine individual customer's respective PRMR, nor has an analysis been performed on those five large industrial customers.
- c) Please see response b. However, it should be noted that an individual industrial customer's firm service election will not affect their capacity requirement.

Cause No. 45159
Northern Indiana Public Service Company LLC's
Objections and Responses to
Walmart Inc.'s Set No. 1

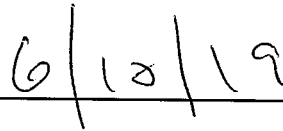
- d) Please see response b & c.
- e) Please see response b & c.

VERIFICATION

I, Steve W. Chriss, Director, Energy Services for Walmart Inc., affirm under penalties for perjury that the foregoing Direct Testimony and Exhibits are true to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read 'Steve W. Chriss', written over a horizontal line.

Steve W. Chriss

A handwritten date '6/12/19' written in black ink over a horizontal line.

Date