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June 13, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, Oregon 97308-1088

Re: UE 416 – In the Matter of Portland General Electric, Request for a General Rate Revision

Dear Sir or Madam:

Please accept for filing the following documents for filing on behalf of Walmart Inc.:

1. Testimony and Exhibits of Steve W. Chriss; and
2. Testimony and Exhibits of Alex J. Kronauer.

If you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia
Justina A. Caviglia

JAC:rs
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

**IN THE MATTER OF)
)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
)
REQUEST FOR A GENERAL RATE REVISION;)
AND 2024 ANNUAL POWER COST UPDATE)**

DIRECT TESTIMONY AND EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

JUNE 13, 2023

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Walmart/101: Witness Qualifications Statement

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 72716-0550. I am employed by Walmart Inc.¹ as Director, Energy and Strategy
5 Analysis.

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

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

8 **Q. IS WALMART SPONSORING THE TESTIMONY OF ANOTHER WITNESS IN THIS DOCKET?**

9 A. Yes. Walmart is sponsoring the testimony of Alex J. Kronauer in Walmart/200.

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

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

¹ Effective February 1, 2018, Wal-Mart Stores, Inc. changed its corporate legal name to Walmart Inc.

1 Energy Regulatory Analysis, in June 2011. I was promoted to my current position in
2 October, 2016 and the position was re-titled in October, 2018. My Witness
3 Qualifications Statement is attached as Walmart/101.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE COMMISSION?**

5 A. Yes. I submitted testimony in Docket Nos. UX 29, UE 179, UE 180, UM 1129, and UG
6 173 on behalf of Staff, and in Docket Nos. UE 217, UE 262, UE 263, UE 264, UE 267,
7 UE 319, UE 335, UE 374, UE 394, and UM 1953 on behalf of Walmart.

8 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
9 **REGULATORY COMMISSIONS?**

10 A. Yes. I have submitted testimony in over 250 proceedings before 42 other utility
11 regulatory commissions. I have also submitted testimony before legislative
12 committees in Missouri, Kansas, North Carolina, and South Carolina. My testimony
13 has addressed topics including, but not limited to, cost of service and rate design,
14 return on equity, revenue requirements, ratemaking policy, large customer
15 renewable programs, qualifying facility rates, telecommunications deregulation,
16 resource certification, energy efficiency/demand side management, fuel cost
17 adjustment mechanisms, decoupling, and the collection of cash earnings on
18 construction work in progress.

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

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

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

1 A. As shown on Walmart’s website, Walmart operates 45 retail units and employs over
2 12,000 associates in the Oregon. In fiscal year ending 2023, Walmart purchased \$1
3 billion worth of goods and services from Oregon-based suppliers, supporting over
4 18,000 supplier jobs.²

5 **Q. PLEASE BRIEFLY DESCRIBE WALMART’S OPERATIONS WITHIN THE COMPANY’S**
6 **SERVICE TERRITORY.**

7 A. Walmart has 16 stores and related facilities that take electric service from Portland
8 General Electric Company (“PGE” or “Company”), primarily on the Company’s
9 Schedule 85, Large Nonresidential Standard Service (201 kW – 4,000 kW) (“Schedule
10 85”) rate schedule. Walmart also has several accounts on the Company’s Schedule
11 83, Large Nonresidential Standard Service (31 kW – 200 kW) (“Schedule 83”) rate
12 schedule

13

14 **Purpose of Testimony and Summary of Recommendations**

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

16 A. The purpose of my testimony is to respond to PGE’s rate case filing and to provide
17 recommendations to assist the Commission in its thorough and careful consideration
18 of the customer impact of the Company’s proposed rate increase.

² <https://corporate.walmart.com/about/oregon>

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

4 A. Yes. Electricity is a significant operating cost for retailers such as Walmart. When
5 electric rates increase, the increased cost to retailers can put pressure on consumer
6 prices and on the other expenses required by a business to operate. The Commission
7 should thoroughly and carefully consider the impact on customers in examining the
8 requested revenue requirement and ROE, in addition to all other facets of this case,
9 to ensure that any increase in the Company's rates is the minimum amount necessary
10 to provide safe, adequate, and reliable service, while also providing PGE the
11 opportunity to recover its reasonable and prudent costs and earn a reasonable return
12 on its investment.

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

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

- 15 1) Walmart does not oppose the Company's proposal to allocate generation
16 capacity cost using a four coincident peak ("4CP") allocator.
- 17 2) Walmart does not oppose the Company's proposal to allocate transmission
18 costs using a twelve coincident peak ("12CP") allocator.
- 19 3) Walmart does not take a position on the other facets of the Company's
20 proposed cost of service model at this time. However, to the extent that
21 alternative cost of service models or modifications to the Company's cost of

1 service model are proposed by other parties, Walmart reserves the right to
2 address such changes in accord with the Commission's procedures in this
3 docket.

4 4) For the purposes of this docket, Walmart does not oppose the Company's
5 proposed rate spread methodology.

6 5) For the purposes of this docket, Walmart does not oppose the Company's
7 proposal to recover 35 percent of generation costs through the generation
8 demand charge for Schedules 83 and 85.

9 6) The Commission should require PGE to clarify that, for customers taking
10 service under the Plug-In Electric Vehicle (EV) Time of Day option of Schedule
11 38, those services be allowed to exceed 200 kW. Walmart proposes the
12 following revision to the tariff language:

13 This optional schedule is applicable to Large Nonresidential
14 Customers: 1) Served at Secondary Demand Voltage whose Demand
15 has not exceeded 200 kW more than six times in the preceding 13
16 months and has not exceeded 4,000 kW more than once in the
17 preceding 13 months, or with seven months or less of service has not
18 had a Demand exceeding 4,000 kW; ~~or 2) who were receiving service~~
19 on Schedule 38 as of December 31, 2015; or 3) for customers taking
20 service on the separately metered Plug-In Electric Vehicle (EV) Time of

1 Day option, whose Demand has not exceeded 4,000 kW more than
2 once in the preceding 13 months.

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

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

7

8 **Cost of Service**

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

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

14 **Q. WHAT IS YOUR GENERAL UNDERSTANDING OF THE COMPANY'S PROPOSED COST**
15 **OF SERVICE STUDY?**

16 A. My understanding is that the Company proposes a cost of service study based on the
17 Company's marginal generation, transmission, distribution, customer, and street
18 lighting costs. See PGE/1200/Macfarlane-Keene/1/9-11.

19 **Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF GENERATION AND**
20 **TRANSMISSION CAPACITY COST ALLOCATION?**

1 A. Generation capacity cost allocation is the process of allocating to each customer class
2 the fixed costs of a utility's generation assets. Likewise, transmission cost allocation
3 is the process of allocating to each customer class the fixed costs of a utility's
4 transmission assets. Fixed costs are defined as costs that do not vary with the level of
5 output and must be paid even if there is no output.³

6 **Q. DO A UTILITY'S FIXED GENERATION OR TRANSMISSION CAPACITY COSTS CHANGE**
7 **WITH CHANGES IN THE AMOUNT OF ELECTRICITY GENERATED?**

8 A. No. The utility's fixed production capacity costs do not change with changes in the
9 amount of electricity generated. For example, if a baseload unit is not dispatched and
10 produces no energy, the fixed costs are not avoided by the utility or customers.
11 Generation units can be built and operated for different reasons, such as lower fuel
12 costs, peaking needs, or reliability, but the way in which a generation unit is operated
13 does not change the fact that the fixed costs are, in fact, fixed, and should be treated
14 as such in the generation capacity cost allocation.

15 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED METHODOLOGY**
16 **TO ALLOCATE GENERATION CAPACITY COSTS TO THE CUSTOMER CLASSES?**

17 A. My understanding is that the Company proposes to multiply the real levelized annual
18 capacity cost from the marginal cost of service study by the projected test-period
19 peak-hour load, which, per the Company's testimony is projected to occur in August.

³ Pindyck, Robert S. and Daniel L. Rubinfeld, Microeconomics, 5th ed., 2001, page 206.

1 The Company then proposes to allocate that generation capacity cost to customer
2 classes using a 4CP allocator based on the Company's January, July, August, and
3 December peaks. *See* PGE/1300/Macfarlane-Pleasant/5/8-12.

4 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED METHODOLOGY**
5 **TO ALLOCATE TRANSMISSION COSTS AMONG THE CUSTOMER CLASSES?**

6 A. My understanding is that the Company proposes to allocate transmission costs to the
7 customer classes on the basis of each classes' 12CP times the marginal unit cost of
8 transmission. *Id*/6/7-9.

9 **Q. DOES WALMART OPPOSE THE COMPANY'S PROPOSED GENERATION CAPACITY**
10 **COST AND TRANSMISSION COST ALLOCATIONS?**

11 A. No. The use of coincident peak allocators for generation capacity and transmission
12 costs properly reflects that these costs are incurred in order to meet customer
13 demands on the system.

14 **Q. DOES WALMART TAKE A POSITION ON THE OTHER FACETS OF THE COMPANY'S**
15 **PROPOSED COST OF SERVICE MODEL AT THIS TIME?**

16 A. No. However, to the extent that alternate cost of service models or modifications to
17 the Company's model are proposed by other parties, Walmart reserves the right to
18 address any such proposals or changes in accord with the Commission's procedures
19 in this docket.

20

1 **Rate Spread**

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

4 A. The Company does not represent this relationship through a metric per se, but instead
5 employs the customer impact offset (“CIO”) in the rate design process to assign
6 receipt or payment of a subsidy to a particular customer class. A positive CIO value
7 means that the rate class is paying rates in excess of the costs incurred to serve that
8 class, while a negative CIO means that the rate class is paying rates less than the costs
9 incurred to serve that class. As such, those rate classes with a positive CIO are
10 subsidizing the classes with a negative CIO.

11 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S PROPOSED RATESPREAD?**

12 A. My understanding is that the Company proposes to reallocate the initial transmission,
13 ancillary service, and distribution cost allocations that comprise the transmission and
14 distribution demand charges between Schedules 89 and 90 and to equalize the
15 distribution charges for Schedules 15, 91, and 95 through the CIO. *See*
16 *PGE/1300/Macfarlane-Pleasant/11/2*. An examination of the Company’s proposed
17 CIO shows that the mechanism is only used for Schedules 15, 91, and 95, with all other
18 schedules set at their respective costs of service. *See PGE/1303/Macfarlane-*
19 *Pleasant/11*.

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

1 A. For the purposes of this docket, Walmart does not oppose the Company's proposed
2 revenue allocation methodology.

3

4 **Schedule 83 and Schedule 85 Generation Rate Design**

5 **Q. WHAT IS YOUR UNDERSTANDING OF THE CURRENT STRUCTURE OF THE**
6 **GENERATION CHARGES FOR SCHEDULES 83 AND 85?**

7 A. My understanding of the current structure of the Schedules 83 and 85 is that
8 generation costs, including fixed costs, are recovered through a combination of on-
9 peak and off-peak \$/kWh energy charges, with the differential between those charges
10 set at 1.5 cents/kWh, and an on-peak generation demand charge. See P.U.C. Oregon
11 No. E-18, Nineteenth Revision of Sheet No. 83-1 and Sixteenth Revision of Sheet No.
12 85-1.

13 **Q. WHAT IS YOUR UNDERSTANDING OF THE TERMS OF THE THIRD STIPULATION IN**
14 **DOCKET UE 335 REGARDING GENERATION DEMAND CHARGES FOR SCHEDULES 83**
15 **AND 85?**

16 A. The third stipulation in UE 335, to which Walmart was a party, stated:

17 "PGE will evaluate a \$/kW on-peak generation demand charge for Schedules
18 83 and 85 in its next general rate case and address in testimony whether it
19 intends to include such demand charges or why it doesn't support such
20 demand charges." See Docket UE 335/Stipulating Parties/401/5, filed
21 September 14, 2018.

1 **Q. DOES PGE PROPOSE CHANGES TO THE GENERATION RATE STRUCTURE FOR**
2 **SCHEDULES 83 AND 85?**

3 A. Yes. The Company states that fixed generation costs comprise approximately 42
4 percent of total generation costs. Current Schedule 83 and 85 generation demand
5 charges 25 percent of generation costs through the demand charge. The Company
6 proposes in this docket to increase that percentage to 35 percent. See
7 PGE/1300/Macfarlane-Pleasant/4/1-6.

8 **Q. WHY DOES PGE PROPOSE TO MOVE ONLY TO 35 PERCENT?**

9 A. The Company states that the proposed change to 35 percent is to better align fixed
10 cost recovery while employing gradualism. *Id*/4/6-8.

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

12 A. For the purposes of this docket, Walmart does not oppose the Company's proposal to
13 recover 35 percent of generation costs through the generation demand charge for
14 Schedules 83 and 85.

15

16 **Schedule 38 Plug-In Electric Vehicle (EV) Time of Day Option**

17 **Q. DOES WALMART HAVE EXPERIENCE IN THE ELECTRIC VEHICLE ("EV") CHARGING**
18 **SPACE?**

19 A. Yes, Walmart has substantial experience with offering EV charging to its customers
20 and is actively growing its presence in the EV charging space. Specifically, Walmart
21 currently hosts more than 1,200 public Direct Current Fast Chargers ("DCFC") at 285

1 different locations and across 43 states. As announced recently, Walmart intends to
2 build its own EV fast-charging network at thousands of Walmart and Sam's Club
3 locations across the U.S. over the next few years.⁴ Walmart retail sites are ideally
4 situated for EV charging stations because of their large parking lots, easy public access,
5 and multi-site locations.

6 **Q. WHY HAS WALMART DECIDED TO PARTICIPATE IN THE PUBLIC EV CHARGING**
7 **SPACE?**

8 A. As part of its renewable energy and carbon reduction efforts, Walmart is committed
9 to supporting EV adoption by providing EV charging stations in thousands of locations
10 that not only serve EV customers who reside and/or work nearby but also advances
11 the nationwide EV infrastructure as a whole. Furthermore, Walmart is proud to offer
12 EV charging as a convenience to its customers who currently own EVs and for future
13 EV owners. Building an EV charging infrastructure that serves local communities, both
14 large and small, as well as corridors located within states and throughout the country,
15 is critical as vehicle owners consider their options when purchasing a new vehicle.

16 **Q. WHAT FACTORS DOES WALMART CONSIDER WHEN INSTALLING OR SITING EV**
17 **CHARGING INFRASTRUCTURE?**

18 A. As a general rule, Walmart seeks to site EV charger locations to provide value to
19 Walmart and its customers. Walmart seeks to balance the risks and costs of installing

⁴ <https://corporate.walmart.com/newsroom/2023/04/06/leading-the-charge-walmart-announces-plan-to-expand-electric-vehicle-charging-network>

1 and maintaining EV charging infrastructure by participating in various EV-specific
2 programs offered by states or utility companies, such as rebate programs and "make
3 ready" programs. Additionally, the economics of a particular EV charging station is
4 informed, in part, by the tariff under which the electricity is provided from the utility
5 to the owner of the EV charger.

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S SCHEDULE 38?**

7 A. My understanding is that a large non-residential customer that chooses to deploy EV
8 charging can do so either as an integrated service with their other facilities or as a
9 separately metered service billed under the time-of-use option and rate structures
10 provided through Schedule 38. Generally, this is a term of service that will serve to
11 enable EV charging deployment and support EV adoption, as the rate schedule is well
12 structured for the unique operational and financial challenges faced by public EV
13 charging. However, Walmart seeks to clarify the applicability provision of the
14 schedule, as it is not clear the amount of charging service that could be deployed at a
15 service per the schedule.

16 **Q. PLEASE EXPLAIN.**

17 A. The existing and proposed Schedule 38 applicability language states:

18 "This optional schedule is applicable to Large Nonresidential Customers: 1)
19 Served at Secondary Demand Voltage whose Demand has not exceeded 200
20 kW more than six times in the preceding 13 months and has not exceeded
21 4,000 kW more than once in the preceding 13 months, or with seven months

1 or less of service has not had a Demand exceeding 4,000 kW; or 2) who were
2 receiving service on Schedule 38 as of December 31, 2015.” See P.U.C. Oregon
3 No. E-18, Eighteenth Revision of Sheet No. 38-1 and PGE/1301/Macfarlane-
4 Pleasant/75.

5 As such, it appears that the service is limited to 200 kW, with some extremely limited
6 nominal ability to exceed a monthly peak demand of 200 kW.

7 **Q. WOULD THIS LANGUAGE LIMIT THE AMOUNT OF DIRECT CURRENT FAST CHARGING**
8 **THAT COULD BE DEPLOYED AT A LOCATION?**

9 A. Yes. Many direct current fast chargers (“DCFC”) are large enough that installing two
10 chargers would exceed 200 kW. To wit, the 200 kW service provision would preclude
11 use of the schedule by a DCFC charging deployment compliant with the Federal
12 National Electric Vehicle Infrastructure program, which requires a minimum of four
13 chargers each capable of 150 kW of simultaneous operation.⁵

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

15 A. In order to support EV charger deployment and support EV adoption within PGE’s
16 territory, the Commission should require PGE to clarify that, for customers taking
17 service under the Plug-In Electric Vehicle (EV) Time of Day option of Schedule 38,
18 those services be allowed to exceed 200 kW. Walmart proposes the following revision
19 to the tariff language:

⁵ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

1 This optional schedule is applicable to Large Nonresidential Customers: 1)
2 Served at Secondary Demand Voltage whose Demand has not exceeded 200
3 kW more than six times in the preceding 13 months and has not exceeded
4 4,000 kW more than once in the preceding 13 months, or with seven months
5 or less of service has not had a Demand exceeding 4,000 kW; ~~or~~ 2) who were
6 receiving service on Schedule 38 as of December 31, 2015; or 3) for customers
7 taking service on the separately metered Plug-In Electric Vehicle (EV) Time of
8 Day option, whose Demand has not exceeded 4,000 kW more than once in the
9 preceding 13 months.

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

11 A. Yes.

Steve W. Chriss

Walmart Inc.

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

EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

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

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

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

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

EDUCATION

2001

Louisiana State University

M.S., Agricultural Economics

1997-1998

University of Florida

Graduate Coursework, Agricultural Education
and Communication

1997

Texas A&M University

B.S., Agricultural Development

B.S., Horticulture

PRESENT MEMBERSHIPS

Arkansas Advanced Energy Foundation, Board

Clean Energy Buyers Alliance, Advisory Board

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

South Carolina Electricity Market Reforms Measures Study Committee

The Ray, Advisory Council

PAST MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Southwest Power Pool, Corporate Governance Committee

TESTIMONY BEFORE REGULATORY COMMISSIONS

2023

Arizona Docket No. E-04204A-22-0251: In the Matter of the Application of UNS Electric, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of UNS Electric, Inc. Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

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

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

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

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

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

Arizona Docket No. E-01933A-22-0107: In the Matter of the Application of Tucson Electric Power Company for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of Tucson Electric Power Company Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

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

2022

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

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

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

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

Nevada Docket No. 22-06014: In the Matter of the Application by Sierra Pacific Power Company d/b/a NV Energy, Filed Pursuant to NRS 704.110(3) and NRS 704.110(4), Addressing its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers.

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

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

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

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

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

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

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

2021

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

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

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

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

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

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

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

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

New Mexico Case No. 20-00222-UT: In the Matter of the Joint Application of Avangrid, Inc., Avangrid Networks, Inc., NM Green Holdings, Inc., Public Service Company of New Mexico and PNM Resources, Inc. For Approval of the Merger of NM Green Holdings, Inc. with PNM Resources, Inc.; Approval of a General

Diversification Plan; and All Other Authorizations and Approvals Requires to Consummate and Implement this Transaction.

2020

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2019

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Georgia Docket No. 42310: In Re: Georgia Power Company's 2019 Integrated Resource Plan and Application for Certification of Capacity From Plant Scherer Unit 3 and Plant Goat Rock Units 9-12 and Application for

Decertification of Plant Hammond Units 1-4, Plant McIntosh Unit 1, Plant Langdale Units 5-6, Plant Riverview Units 1-2, and Plant Estatoah Unit 1.

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

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

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

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

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

2018

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2015

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2014

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2013

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2011

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2010

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

2008

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

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

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

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

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

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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

TESTIMONY BEFORE LEGISLATIVE BODIES

2020

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

2019

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

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

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

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

2018

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

2017

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

2016

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

2014

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

2012

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

2011

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

AFFIDAVITS

2015

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

2011

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

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

**IN THE MATTER OF)
)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
)
REQUEST FOR A GENERAL RATE REVISION;)
AND 2024 ANNUAL POWER COST UPDATE)**

DIRECT TESTIMONY AND EXHIBITS OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

JUNE 13, 2023

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Exhibits

Walmart/201: Witness Qualifications Statement

Walmart/202: Impact of PGE's Proposed Return on Equity vs. PGE's Currently Approved Return On Equity

Walmart/203: Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

Walmart/204: Calculation of Revenue Requirement Impact of PGE's Proposed ROE vs. Average ROE Awarded to Vertically Integrated Utilities from 2019-Present

1 **I. Introduction**

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

3 A. My name is Alex J. Kronauer. My business address is 2608 SE J St., Bentonville, AR
4 72716. I am employed by Walmart Inc. ("Walmart") as a Senior Manager, Energy
5 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. IS WALMART SPONSORING THE TESTIMONY OF ANOTHER WITNESS IN THIS DOCKET?**

9 A. Yes. Walmart is sponsoring the testimony of Steve W. Chriss in Walmart/100.

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

11 A. In 2011, I earned a Master of Business Administration at the McCombs School of
12 Business at The University of Texas at Austin with a concentration in Finance and
13 Investment Management. From 2011 to 2012, I was a Senior Financial Analyst at TXU
14 Energy, a Texas-based power supplier. My duties included load forecasting and
15 analysis. From 2012 to 2019, I was a Financial Analyst and later a Senior Financial
16 Analyst at CyrusOne, a data center provider in Dallas. I was involved in several power-
17 related areas, including demand response, power procurement, and power expense
18 forecasting. I joined the Walmart Energy Department in July 2019 as a Senior
19 Manager. Since joining Walmart, I have joined the Pacific Gas & Electric Cost
20 Allocation Mechanism Group, I have joined the Arizona Independent Scheduling
21 Administrator Association ("AZISA"), a trade association that supports open

1 transmission access to support retail electric competition in Arizona, and I have
2 earned the Certified Rate of Return Analyst ("CRRA") designation. My Witness
3 Qualifications Statement is attached as Attachment AJK-1.

4 **Q. DO YOU HOLD ANY CERTIFICATIONS THAT ARE RELEVANT TO THE ISSUES BEFORE**
5 **THE PUBLIC UTILITY COMMISSION OF OREGON ("COMMISSION") IN THIS**
6 **PROCEEDING?**

7 A. Yes, I am a member of the Society of Utility and Regulatory Financial Analysts
8 ("SURFA"). In 2022, I was awarded the CRRA professional designation by SURFA. The
9 CRRA designation is based on education, experience, and the successful completion
10 of a comprehensive written examination.

11 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE COMMISSION?**

12 A. Yes. I submitted testimony in Docket No. UE 399.

13 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
14 **REGULATORY COMMISSIONS?**

15 A. Yes, I have submitted testimony with state regulatory commissions in 17 states as set
16 forth in Exhibit AJK-1.

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

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

19

20 **II. Purpose of Testimony and Summary of Recommendations**

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

1 A. The purpose of my testimony is to respond to the Return on Equity ("ROE")
2 component of PGE's rate case filing and to provide recommendations to assist the
3 Commission in its thorough and careful consideration of the customer impact of the
4 Company's proposed rate increase.

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

8 A. Yes. Electricity is a significant operating cost for retailers such as Walmart. When
9 electric rates increase, the increased cost to retailers can put pressure on consumer
10 prices and on the other expenses required by a business to operate. The Commission
11 should thoroughly and carefully consider the impact on customers in examining the
12 requested revenue requirement and ROE, in addition to all other facets of this docket,
13 to ensure that any increase in the Company's rates is the minimum amount necessary
14 to provide safe, adequate, and reliable service, while also providing PGE the
15 opportunity to recover its reasonable and prudent costs and earn a reasonable return
16 on its investment.

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

18 A. My recommendation is that the Commission should closely examine the Company's
19 proposed increase in ROE in light of:

20 1. The customer impact of the resulting revenue requirement increase from the
21 Company's currently approved ROE;

- 1 2. The use of a forecasted test year, which reduces regulatory lag by allowing the
2 utility to include the most current information in its rates at the time they will be
3 in effect;
- 4 3. Recent rate case ROEs approved by the Commission; and
- 5 4. Recent rate case ROEs approved by other state regulatory commissions.

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

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

10

11 **III. Revenue Requirement and Cost of Capital**

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

14 A. My understanding is that the Company proposes a net annual revenue requirement
15 increase in this docket of approximately \$338 million using a forecasted test year
16 ending December 31, 2024. See PGE/100/Pope-Sims/12/2-3 and PGE/200/Batzler-
17 Ferchland/3/2-3.

18 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ROE AND**
19 **WEIGHTED AVERAGE COST OF CAPITAL ("WACC") IN THIS DOCKET?**

20 A. My understanding is that the Company proposes an ROE of 9.80 percent, based on a
21 range of 9.70 percent to 10.40 percent. See PGE/1000/Liddle-Villadsen/23/1-4. The

1 Company proposes a cost of long-term debt of 4.32 percent, and a capital structure
2 of 50.00 percent equity and 50.00 percent long-term debt for a proposed overall
3 WACC of 7.06 percent. See PGE/1000/Liddle-Villadsen/76/2-5.

4 **Q. IS WALMART CONCERNED ABOUT THE REASONABLENESS OF THE COMPANY'S**
5 **PROPOSED ROE?**

6 A. Yes, especially when viewed in light of:

- 7 1. The customer impact of the resulting revenue requirement increase from the
8 Company's currently approved ROE;
9 2. Recent rate case ROEs approved by the Commission; and
10 3. Recent rate case ROEs approved by other state regulatory commissions.

11

12 **A. *Customer Impact***

13 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S CURRENTLY APPROVED ROE?**

14 A. My understanding is that the Company's currently authorized ROE is 9.50 percent.¹

15 **Q. HAVE YOU CALCULATED AN ESTIMATE OF THE IMPACT TO CUSTOMERS OF THE**
16 **DIFFERENCE BETWEEN THE CURRENTLY AUTHORIZED ROE OF 9.50 PERCENT AND**
17 **THE 9.80 PERCENT ROE PROPOSED BY THE COMPANY?**

18 A. Yes. Holding the rate base constant and using the Company's proposed cost of debt
19 and capital structure, the revenue requirement impact of the difference between the

¹ See *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision, Docket UE 394, Order (issued April 25, 2022), Appendix A, page 1.*

1 currently authorized ROE of 9.50 percent and the Company's proposed 9.80 percent
2 ROE is approximately \$12.9 million, or 3.8 percent of the proposed revenue
3 requirement increase. See Exhibit AJK-2.

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

5 **Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN THE ROEs**
6 **APPROVED BY THE COMMISSION FROM 2019, 2020, 2021, 2022, AND SO FAR IN**
7 **2023?**

8 A. Yes. During 2019, 2020, 2021, 2022, and so far in 2023, the Commission has issued
9 orders with stated ROEs in three dockets, each with an average approved ROE of 9.50
10 percent. See Exhibit AJK-3.

11 **Q. IN WHICH DOCKETS DID THE COMMISSION ISSUE ORDERS WITH STATED ROEs?**

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

- 13 • Docket UE 374, the PacifiCorp general rate case that completed in 2020, in which
14 the Commission approved an ROE of 9.50 percent.²
- 15 • Docket D-UE-394, the Company' previous general rate case that completed in
16 2022, in which the Commission approved an ROE of 9.50 percent.³
- 17 • Docket D-UE-399, the PacifiCorp general rate case that completed in 2022, in

² See *In the Matter of the PACIFICORP, dba Pacific Power, Request for a General Rate Revision, Docket UE 374, Order 20-473, issued December 19, 2020, page 31.*

³ See *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision, Docket UE 394, Order (issued April 25, 2022), Appendix A, page 1.*

1 which the Commission approved an ROE of 9.50 percent.⁴

2 As such, the Company's proposed 9.80 percent ROE is counter to recent Commission
3 actions regarding ROE.

4
5 **C. National Utility Industry ROE and Weighted Equity Cost Trends**

6 **Q. HOW DOES THE COMPANY'S PROPOSED ROE COMPARE TO ELECTRIC ROEs**
7 **APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS IN 2019, 2020, 2021,**
8 **2022, AND SO FAR IN 2023?**

9 A. According to data from S&P Global Market Intelligence ("S&P Global"), a financial
10 news and reporting company, the average of the 150 reported electric utility rate case
11 ROEs authorized by commissions for investor-owned utilities in 2019, 2020, 2021,
12 2022, and so far in 2023, is 9.47 percent. *See* Exhibit AJK-3. Specifically, the average
13 approved ROE was 9.64 percent in 2019, 9.39 percent in 2020, 9.38 percent in 2021,
14 9.45 percent in 2022, and 9.64 percent so far in 2023. *See id.* The range of reported
15 authorized ROEs for the period is 7.36 percent to 10.60 percent, and the median
16 authorized ROE is 9.50 percent. *See id.* As such, the Company's proposed 9.80 percent
17 ROE is counter to broader electric industry trends.

⁴ *See* Docket No. UE 374, *In the Matter of the PACIFICORP, dba Pacific Power, Request for a General Rate Revision, Order 22-491, issued December 16, 2022, Appendix C, page 4.*

1 **Q. SEVERAL OF THE REPORTED AUTHORIZED ROEs ARE FOR DISTRIBUTION-ONLY**
2 **UTILITIES. WHAT IS THE AVERAGE AUTHORIZED ROE IN THE REPORTED GROUP FOR**
3 **VERTICALLY INTEGRATED UTILITIES?**

4 A. In the group reported by S&P Global, the average electric ROE for vertically integrated
5 utilities authorized over the same time period is 9.61 percent. *See id.* Specifically, the
6 average electric ROE authorized for vertically integrated utilities in 2019 was 9.73
7 percent, 9.55 percent in 2020, 9.54 percent in 2021, 9.60 percent in 2022, and 9.70
8 percent so far in 2023. *See id.* In fact, as shown in Figure 1, the Company's proposed
9 9.80 percent ROE, if approved, would be in the top third of authorized ROEs for a
10 vertically integrated utility from 2019 to present (out of 106).

11

1 **Q. WHAT IS THE DIFFERENCE IN REVENUE REQUIREMENT BETWEEN THE COMPANY'S**
2 **PROPOSED 9.80 PERCENT ROE AND THE 9.61 PERCENT AVERAGE AUTHORIZED ROE**
3 **FOR VERTICALLY INTEGRATED ELECTRIC UTILITIES FROM 2019 TO PRESENT?**

4 A. For the Company's proposed 9.80 percent ROE, holding the rate base constant and
5 using the Company's proposed cost of debt and capital structure, the revenue
6 requirement impact of the difference between the average authorized ROE for
7 vertically integrated utilities of 9.61 percent and the Company's proposed 9.80
8 percent ROE is approximately \$8.0 million, or 2.4 percent of the proposed revenue
9 requirement increase. *See Exhibit AJK-4.*

10 **Q. IS WALMART RECOMMENDING THAT THE COMMISSION SHOULD BE BOUND BY**
11 **ROEs AUTHORIZED BY OTHER STATE REGULATORY AGENCIES?**

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

17

1 **D. Conclusion**

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

4 A. My recommendation is that the Commission should closely examine the Company's
5 proposed increase in ROE in light of:

6 1. The customer impact of the resulting revenue requirement increase from the
7 Company's currently approved ROE;

8 2. The use of a forecasted test year, which reduces regulatory lag by allowing the
9 utility to include the most current information in its rates at the time they will be
10 in effect;

11 3. Recent rate case ROEs approved by the Commission; and

12 4. Recent rate case ROEs approved by other state regulatory commissions.

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

14 A. Yes.

Alex J. Kronauer

Senior Manager, Energy Services

Walmart Stores, Inc.

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

Business Phone: (312) 231-6667

INDUSTRY EXPERIENCE

August 2019 – Present

Walmart Inc., Bentonville, AR

Senior Manager, Energy Services

Feb 2023 - Present

Member, Cost Allocation Mechanism Group, Pacific Gas & Electric

September 2022 - Present

Arizona Independent Scheduling Administrator Association (AZISA)

Member, End Use Customers

May 2014 – July 2019

CyrusOne, Dallas, TX

Senior Financial Analyst

November 2012 – April 2014

CyrusOne, Dallas, TX

Financial Analyst

July 2011 – October 2012

TXU Energy (now Vistra Corporation), Irving, TX

Senior Financial Analyst

EDUCATION

2011 University of Texas at Austin, McCombs School of Business

MBA

2005 Colby College

B.A., Economics

INDUSTRY TRAINING

Earned the CRRA (Certified Rate of Return Analyst) designation, May 2022

Passed the Chartered Financial Analyst (CFA) level I exam

TESTIMONY BEFORE REGULATORY COMMISSIONS

2023

Maryland Public Service Commission Docket No. 9695: In the Matter of the Application of The Potomac Edison Company for Adjustments to its Retail Rates for the Distribution of Electric Energy

Public Utilities Commission of Ohio Case No. 23-0023-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, Case No. 23-0024-EL-AAM: In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority.

Illinois Commerce Commission Docket No. 22-0486, Commonwealth Edison Company Order Requiring Commonwealth Edison Company to file an Initial Multi-Year Integrated Grid Plan and Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the Public Utilities Act and Docket No. 23-0055, Commonwealth Edison Company Petition for Approval of a Multi-Year Rate Plan under Section 16-108.18 of the Public Utilities Act.

Illinois Commerce Commission Docket No. 22-0487, Ameren Illinois Company d/b/a Ameren Illinois Order Requiring Ameren Illinois Company to file an Initial Multi-Year Integrated Grid Plan and Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the Public Utilities Act and Docket No. 23-0082, Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18

Colorado Public Utilities Commission Docket No. 22AL-0530E: In the Matter of Advice Letter No. 1906 — Electric of Public Service Company of Colorado to Revise its Colorado PUC No. 8 — Electric Tariff To Revise Jurisdictional Base Rate Revenues, Implement New Base Rates for all Electric Rate Schedules, and Make Other Proposed Tariff Changes Effective December 31, 2022

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

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

Public Service Commission of the State of North Dakota Case No. PU-22-194, Montana-Dakota Utilities Co. 2022 Electric Rate Increase Application

Indiana Utility Regulatory Commission Cause No. 45772: Petition Of Northern Indiana Public Service Company LLC Pursuant To Ind. Code §§ 8-1-2-42.7, 8-1-2-61, And, 8-1-2.5-6 For (1) Authority To Modify Its Retail Rates And Charges For Electric Utility Service Through A Phase In Of Rates; (2) Approval Of New Schedules Of Rates And Charges, General Rules And Regulations, And Riders (Both Existing And New); (3) Approval Of A New Rider For Variable Nonlabor O&M Expenses Associated With Coal-fired Generation; (4) Modification Of The Fuel Cost Adjustment To Pass Back 100% Of Off-System Sales Revenues Net Of Expenses; (5) Approval Of Revised Common And Electric Depreciation Rates Applicable To Its Electric Plant In Service; (6) Approval Of Necessary And Appropriate Accounting Relief, Including But Not Limited To Approval Of (A) Certain Deferral Mechanisms For Pension And Other Postretirement

Benefits Expenses; (B) Approval Of Regulatory Accounting For Actual Costs Of Removal Associated With Coal Units Following The Retirement Of Michigan City Unit 12, And (C) A Modification Of Joint Venture Accounting Authority To Combine Reserve Accounts For Purposes Of Passing Back Joint Venture Cash, (7) Approval Of Alternative Regulatory Plans For The (A) Modification Of Its Industrial Service Structure, And (B) Implementation Of A Low Income Program; And (8) Review And Determination Of NIPSCO's Earnings Bank For Purposes Of Ind. Code § 8-1-2-42.3.

2022

Public Service Commission of the State of Montana Docket No. 2022.07.078: In the Matter of Northwestern Energy's Application for Authority to Increase Retail Electric and Natural Gas Utility Service Rates and for Approval of Electric and Natural Gas Service Schedules and Rules and Allocated Cost of Service and Rate Design

Public Utilities Regulatory Authority of Connecticut Docket No. 22-08-08: Application of the United Illuminating Company to Amend its Rate Schedules

Public Service Commission of the State of Wyoming Docket No. 20003-214-ER-22 (Record No. 17072): In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy for a General Rate Increase of \$15,366,026 per Annum and Authority to Revise its Power Cost Adjustment Mechanism

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

New York Public Service Commission Case No. 22-E-0317: 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. 22-G-0318: 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. 22-E-0319: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Rochester Gas And Electric Corporation For Electric Service.

New York Public Service Commission Case No. 22-G-0320: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Rochester Gas And Electric Corporation For Gas Service.

Public Service Commission of Wisconsin Docket No. 6690-UR-127, Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Public Service Commission of Wisconsin Docket No. 5-UR-110, Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas and Steam Rates.

Public Utilities Commission of Texas Docket No. 53601/SOAH Docket No. 473-22-2695: Application of Oncor Electric Delivery Company LLC for Authority to Change Rates.

Maryland Public Service Commission Docket No. 9681: In the Matter of the Application of Delmarva Power & Light Company for Electric Multi-Year Plan

California Public Utilities Commission Docket No. A.22-04-008: Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism (U39M).

California Public Utilities Commission Docket No. A.22-04-009: Application of Southern California Edison Company (U 338-E) for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism.

California Public Utilities Commission Docket No. A.22-04-012: Application of San Diego Gas & Electric Company (U 902M) for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism.

Washington Utilities and Transportation Commission Docket Nos. UE220066 and UG-220067 for Puget Sound Energy: General Rate Case to Update Electric Base Rate to Recover Increased Electric Revenue Requirements and General Rate Case to Update Natural Gas Base Rate to Recover Increase Natural Gas Revenue Requirements.

Oregon Public Utility Commission Case No. UE-399: In the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision.

New York Public Service Commission Case No. 22-00217/22-E-0064: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Consolidated Edison Company Of New York, Inc. For Electric Service.

New York Public Service Commission Case No. 22-00218/22-G-0065: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Consolidated Edison Company Of New York, Inc. For Gas Service.

2021

Maryland Public Service Commission Docket No. 9670: In the Matter of the Application of Delmarva Power & Light Company for Adjustments to its Retail Rates

Colorado Public Utilities Commission Docket No. 21AL-0317E: In the Matter of Advice Letter No. 1857 — Electric Filed By Public Service Company of Colorado to Revise its Colorado PUC No. 8 — Electric To Revise Jurisdictional Base Rate Revenues, Implement New Base Rates

for all Electric Rate Schedules, and Make Other Proposed Tariff Changes Effective August 2, 2021

Public Utility Commission of Texas Docket No. 52195/SOAH Docket No. 473-21-2606:
Application of El Paso Electric Company to Change Rates

Public Utility Commission of Texas Docket No. 52397/SOAH Docket No. 473-21-3114:
Application of Southwestern Electric Power Company to Implement a Net Interim Fuel Surcharge

Public Utilities Commission of Ohio Case No. 20-1651-EL-AIR: In the Matter of the Application of The Dayton Power and Light Company to Increase its Rates for Electric Distribution, Case No. 20-1652-EL-AAM: In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority, and Case No. 20-1653-EL-ATA: In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.

Public Utility Commission of Texas Docket No. 51802/SOAH Docket No. 473-21-0478:
Application of Southwestern Public Service Company for Authority to Changes Rates.

Pennsylvania Public Utility Commission Docket No. R-2021-3024601: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division.

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

Colorado Public Utilities Commission Docket No. 20AL-0432E: In the Matter of Advice No. 1835-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 – Electric Tariff to Eliminate the Currently Effective General Rate Schedule Adjustments to Place into Effect Revised Base Rates and other Phase II Tariff Proposals to Become Effective November 19 2020.

Public Utility Commission of Texas Docket No. 51547: Joint Report and Application of Texas-New Mexico Power Company, NM Green Holdings, Inc., and Avangrid, Inc. for Regulatory Approvals Under PURA §§ 14.101, 39.262 AND 39.915.

2020

New York Public Service Public Service Commission Case No. 20-E-0380: Proceeding on motion of the Commission as to the rates, charges, rules, and regulations of Niagara Mohawk Power Corporation d/b/a National Grid for electric service.

Maryland Public Service Commission Docket No. 9645: In the matter of the application of Baltimore Gas and Electric Company for an electric and gas multi-year plan.

Washington Utilities and Transportation Commission Docket UE-191024: In the matter of PacifiCorp for adjustments to its retail rates for electric energy.

Maryland Public Service Commission Docket No. 9630: In the matter of the application of Delmarva Power & Light Company for adjustments to its retail rates for the distribution of electric energy.

Arkansas Public Service Commission Docket No. 20-027-U. Issue: Demand Response participation.

2019

Arkansas Public Service Commission Docket No. 16-027. Issue: Net Metering Implementation.

KEY ACCOMPLISHMENTS

Created and maintained a Rate Monitor tool to assist Walmart's financial planning and analysis (FP&A) team with budgeting and forecasting. Scanned state PSC websites for potential rate changes and quantified rate change impacts by location by month from general rate cases, fuel adjustments, riders, and other items.

Analyzed, pitched, and secured executive approval for CyrusOne's first green energy commitment through a municipal utility. December 2018.

Implemented demand response program utilizing CyrusOne's backup generators, resulting in \$2.5mm of savings over 4 years (2015-2019). Demonstrated and ensured regulatory compliance.

Researched utility tariffs and coordinated with power utilities, contractors, and CyrusOne's commissioning teams to save over \$11mm over 3 years by minimizing utility ratchets and peak demand charges.

Impact of PGE's Proposed Return on Equity vs. PGE's Currently Approved Return On Equity
--

Line No.	Source	Capital Component	Ratio	Cost Rate	Weighted Cost Rate
1	PGE 1000/Liddle-Villadsen/2/Table 1, AJK-3	Long-Term Debt	50.00%	4.32%	2.16%
2		Equity with Currently Approved ROE	50.00%	9.50%	4.75%
3		WACC with Currently Approved ROE	100%		6.91%
4	PGE 201/2	Rate Base		\$	6,290,494,000
5	3 x 4	Return on Rate Base, Currently Approved ROE		\$	434,578,778
6	PGE 1000/Liddle-Villadsen/2/Table 1	Long-Term Debt	50.00%	4.32%	2.16%
7		Equity with Proposed ROE	50.00%	9.80%	4.90%
8		WACC with Proposed ROE	100%		7.06%
9	PGE 201/2	Rate Base		\$	6,290,494,000
10	8 x 9	Proposed Return on Rate Base		\$	444,014,519
11	10 - 5	Difference in Return on Rate Base		\$	9,435,741
12	PGE/201/3	Gross Up Factor			1.3694
13	11 X 12	Difference in Revenue Requirement		\$	12,921,304
14	PGE 201/1	Proposed Revenue Deficiency		\$	337,807,000
15	13 / 14	Difference as Percent of Proposed Revenue Deficiency			3.8%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company	Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(8) - (5)	(10)	(11)	(12)	(13)	(14) (8) X (13)
Michigan	Consumers Energy Co.	CMS	U-20134	10.75%	1/9/2019	V	10.00%	(75)	Y	Settled	N/A	N/A	N/A	
West Virginia	Appalachian Power Co.	AEP	18-0646-E-42T	10.22%	2/27/2019	V	9.75%	(47)	Y	Settled	7.28%	50.16%	4.89%	
New Jersey	Atlantic City Electric Co.	EXC	ER18080925	10.10%	3/13/2019	D	9.60%	(50)	Y	Settled	7.08%	49.94%	4.79%	
New York	Orange & Rockland Utilities Inc.	ED	18-E-0067	9.75%	3/14/2019	D	9.00%	(75)	N	Settled	6.97%	48.00%	4.32%	
Oklahoma	Public Service Company of OK	AEP	PUD201800097	10.30%	3/14/2019	V	9.40%	(90)	Y	Settled	6.97%	N/A	N/A	
Maryland	Potomac Edison Co.	FE	9490	10.80%	3/22/2019	D	9.65%	(115)	N	Fully Litigated	7.15%	52.82%	5.10%	
Kentucky	Kentucky Utilities Co.	PPL	2018-00294	10.42%	4/30/2019	V	9.73%	(69)	N	Settled	N/A	N/A	N/A	
Kentucky	Louisville Gas & Electric Co.	PPL	2018-00295	10.42%	4/30/2019	V	9.73%	(69)	N	Settled	N/A	N/A	N/A	
South Carolina	Duke Energy Carolinas LLC	DUL	2018-319-E	10.50%	5/1/2019	V	9.50%	(100)	N	Fully Litigated	7.16%	53.00%	5.04%	
Michigan	DTE Electric Co.	DTE	U-20162	10.50%	5/2/2019	V	10.00%	(50)	N	Fully Litigated	5.48%	37.94%	3.79%	
South Carolina	Duke Energy Progress LLC	DUK	2018-318-E	10.50%	5/8/2019	V	9.50%	(100)	Y	Fully Litigated	6.99%	53.00%	5.04%	
South Dakota	Otter Tail Power Co.	OTTR	EL18-021	10.30%	5/14/2019	V	8.75%	(155)	Y	Fully Litigated	7.09%	52.92%	4.63%	
Hawaii	Maui Electric Company Ltd	HE	2017-0150	10.60%	5/16/2019	V	9.50%	(110)	N	Settled	7.43%	57.02%	5.42%	
Michigan	Upper Peninsula Power Co.		U-20276	10.50%	5/23/2019	V	9.90%	(60)	N	Settled	6.91%	N/A	N/A	
Maryland	Potomac Electric Power Co.	EXC	9602	10.30%	8/12/2019	D	9.60%	(70)	Y	Fully Litigated	7.45%	50.46%	4.84%	
Vermont	Green Mountain Power Corp.		19-1932-TF	9.16%	8/29/2019	V	9.06%	(10)	N	Fully Litigated	6.85%	49.46%	4.48%	
Wisconsin	Northern States Power Co - WI	XEL	4220-UR-124	N/A Ω	9/4/2019	V	10.00%	N/A	N	Settled	7.74%	52.52%	5.25%	
Massachusetts	Massachusetts Electric Co.	NG	DPU-18-150	10.50%	9/30/2019	D	9.60%	(90)	N	Fully Litigated	7.56%	53.49%	5.14%	
Montana	Northwestern Corp.	NWE	D2018.2.12	10.65%	10/29/2019	V	9.65%	(100)	Y	Settled	6.92%	49.38%	4.77%	
Wisconsin	Wisconsin Electric Power Co.	WEC	05-UR-109	10.35%	10/31/2019	V	10.00%	(35)	Y	Settled	7.49%	54.46%	5.45%	
Wisconsin	Wisconsin Public Service Corp.	WEC	6690-UR-126	10.35%	10/31/2019	V	10.00%	(35)	Y	Settled	7.22%	51.96%	5.20%	
Louisiana	Entergy New Orleans LLC	ETR	UD-18-07	10.50%	11/7/2019	V	9.35%	(115)	Y	Fully Litigated	7.09%	50.00%	4.68%	
Idaho	Avista Corp.	AVA	AVU-E-19-04	9.90%	11/29/2019	V	9.50%	(40)	Y	Settled	7.35%	50.00%	4.75%	
Illinois	Commonwealth Edison Co.	EXC	19-0387	8.91%	12/4/2019	D	8.91%	-	Y	Fully Litigated	6.51%	47.97%	4.27%	
Indiana	Northern Indiana Public Service Co.	NI	45159	10.80%	12/4/2019	V	9.75%	(105)	N	Settled	6.52%	47.86%	4.67%	
Illinois	Ameren Illinois	AEE	19-0436	8.91%	12/16/2019	D	8.91%	-	Y	Fully Litigated	6.71%	50.00%	4.46%	
Georgia	Georgia Power Co.	SO	42516	10.90%	12/17/2019	V	10.50%	(40)	Y	Fully Litigated	N/A	56.00%	5.88%	
Maryland	Baltimore Gas and Electric Co.	EXC	9610	10.30%	12/17/2019	D	9.70%	(60)	Y	Settled	6.94%	N/A	N/A	
California	Pacific Gas & Electric Co.	PCG	A-19-04-015	12.00%	12/19/2019	V	10.25%	(175)	N	Fully Litigated	7.81%	52.00%	5.33%	
California	San Diego Gas & Electric Co.	SRE	A-19-04-017	12.38%	12/19/2019	V	10.20%	(218)	Y	Fully Litigated	7.55%	52.00%	5.30%	
California	Southern California Edison Co.	EIX	A-19-04-014	11.45%	12/19/2019	V	10.30%	(115)	Y	Fully Litigated	7.68%	52.00%	5.36%	
Arkansas	Southwestern Electric Power Co.	AEP	19-008-U	10.50%	12/20/2019	V	9.45%	(105)	Y	Settled	4.93%	33.71%	3.19%	
Nevada	Sierra Pacific Power Co.	BRK.A	19-06002	10.21%	12/24/2019	V	9.50%	(71)	N	Settled	6.75%	50.92%	4.84%	
Iowa	Interstate Power & Light Co.	LNT	RPU-2019-0001	10.25% ¥	1/8/2020	V	10.02% ¥	(23)	Y	Settled	7.23%	51.00%	5.11%	
New York	Consolidated Edison Co. of NY	ED	19-E-0065	9.75%	1/16/2020	D	8.80%	(95)	N	Settled	6.61%	48.00%	4.22%	
New Jersey	Rockland Electric Company	ED	ER19050552	9.60%	1/22/2020	D	9.50%	(10)	N	Settled	7.11%	48.32%	4.59%	
Michigan	Indiana Michigan Power Co.	AEP	U-20359	10.50%	1/23/2020	V	9.86%	(64)	Y	Settled	6.08%	46.56%	4.59%	
California	PacifiCorp	BRK.A	A-18-04-002	10.60%	2/6/2020	V	10.00%	(60)	N	Fully Litigated	N/A	51.96%	5.20%	
Colorado	Public Service Company of Colorado	XEL	19AL-0268E	10.20%	2/11/2020	V	9.30%	(90)	N	Fully Litigated	6.97%	55.61%	5.17%	
Texas	Centerpoint Energy	CNP	49421	10.40%	2/14/2020	D	9.40%	(100)	Y	Settled	6.51%	42.50%	4.00%	
Maine	Central Maine Power Co.	IBE	2018-00194	10.00%	2/19/2020	D	8.25%	(175)	N	Fully Litigated	6.30%	50.00%	4.13%	
North Carolina	Virginia Electric & Power Co.	D	E-22 Sub 562	10.75%	2/24/2020	V	9.75%	(100)	Y	Settled	7.20%	52.00%	5.07%	
Texas	AEP Texas Inc.	AEP	49494	10.50%	2/27/2020	D	9.40%	(110)	Y	Settled	6.45%	42.50%	4.00%	
Indiana	Indiana Michigan Power Co.	AEP	45235	10.50%	3/11/2020	V	9.70%	(80)	Y	Fully Litigated	5.61%	37.55%	3.64%	

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
								(8) - (5)					(8) X (13)
Washington	Avista Corp.	AVA	UE-190334	9.90%	3/25/2020	V	9.40%	(50)	Y	Settled	7.21%	48.50%	4.56%
Massachusetts	Fitchburg Gas & Electric Light	UTL	DPU 19-130	10.50%	4/17/2020	D	9.70%	(80)	N	Settled	7.99%	52.45%	5.09%
Kentucky	Duke Energy Kentucky Inc.	DUK	2019-00271	9.80%	4/27/2020	V	9.25%	(55)	Y	Fully Litigated	6.41%	48.23%	4.46%
Michigan	DTE Electric Co.	DTE	U-20561	10.50%	5/8/2020	V	9.90%	(60)	N	Fully Litigated	5.46%	38.32%	3.79%
New Mexico	Southwestern Public Service Co	XEL	19-00170-UT	10.10%	5/20/2020	V	9.45%	(65)	N	Settled	7.19%	54.77%	5.18%
Indiana	Duke Energy Indiana, LLC	DUK	45253	10.40%	6/29/2020	V	9.70%	(70)	Y	Fully Litigated	5.71%	40.98%	3.98%
New Hampshire	Liberty Utilities Granite St	AQN	DE-19-064	10.00%	6/30/2020	D	9.10%	(90)	N	Settled	7.60%	52.00%	4.73%
Missouri	Empire District Electric Co.	AQN	ER-2019-0374	9.95%	7/1/2020	V	9.25%	(70)	N	Settled	6.77%	46.00%	4.26%
Washington	Puget Sound Energy Inc.		UE-190529	9.50%	7/8/2020	V	9.40%	(10)	N	Fully Litigated	7.39%	48.50%	4.56%
Maryland	Delmarva Power & Light Co.	EXC	9630	10.30%	7/14/2020	D	9.60%	(70)	Y	Fully Litigated	6.84%	50.53%	4.85%
Hawaii	Hawaii Electric Light Co	HE	2018-0368	10.50%	7/28/2020	V	9.50%	(100)	N	Settled	7.52%	56.83%	5.40%
California	Liberty Utilities (CalPeco Electric)	AQN	A-18-12-001	10.30%	8/27/2020	V	10.00%	(30)	N	Fully Litigated	7.63%	52.50%	5.25%
Vermont	Green Mountain Power Corp.		20-1407-TF	8.20%	8/27/2020	V	8.20%	-	N	Fully Litigated	6.43%	49.87%	4.09%
Texas	Southwestern Public Service Co	XEL	49831	10.10%	8/27/2020	V	9.45%	(65)	N	Settled	7.13%	54.62%	5.16%
Hawaii	Hawaiian Electric Co.	HE	2019-0085	10.50%	10/22/2020	V	9.50%	(100)	N	Settled	7.37%	56.83%	5.40%
New Jersey	Jersey Central Power & Light Co.	FE	ER20020146	10.15%	10/28/2020	D	9.60%	(55)	N	Settled	7.40%	51.44%	4.94%
New York	NY State Electric & Gas Corp	IBE	19-E-0378	9.50%	11/19/2020	D	8.80%	(70)	N	Settled	6.10%	48.00%	4.22%
New York	Rochester Gas & Electric Corp	IBE	19-E-0380	9.50%	11/19/2020	D	8.80%	(70)	N	Settled	6.62%	48.00%	4.22%
Virginia	Appalachian Power Co.	AEP	PUR-2020-00015	9.90%	11/24/2020	V	9.20%	(70)	Y	Fully Litigated	N/A	N/A	N/A
Wisconsin	Madison Gas and Electric Co.	MGEE	3270-UR-123 (Elec)	9.80%	11/24/2020	V	9.80%	-	Y	Settled	6.95%	55.00%	5.39%
Illinois	Ameren Illinois	AEE	20-0381	8.38%	12/9/2020	D	8.38%	-	Y	Fully Litigated	6.39%	50.00%	4.19%
Illinois	Commonwealth Edison Co.	EXC	20-0393	8.38%	12/9/2020	D	8.38%	-	Y	Fully Litigated	6.28%	48.16%	4.04%
Nevada	Nevada Power Co.	BRK.A	20-06003	10.08%	12/10/2020	V	9.40%	(68)	N	Settled	7.14%	N/A	N/A
Washington	PacifiCorp	BRK.A	UE-191024	10.20%	12/14/2020	V	9.50%	(70)	N	Settled	7.17%	49.10%	4.66%
New Hampshire	Public Service Co. of NH	ES	DE-19-057	10.40%	12/15/2020	D	9.30%	(110)	N	Settled	6.87%	54.40%	5.06%
Maryland	Baltimore Gas and Electric Co.	EXC	9645	10.10%	12/16/2020	D	9.50%	(60)	Y	Fully Litigated	6.75%	52.00%	4.94%
Michigan	Consumers Energy Co.	CMS	U-20697	10.50%	12/17/2020	V	9.90%	(60)	Y	Fully Litigated	5.67%	N/A	N/A
Oregon	PacifiCorp	BRK.A	UE 374	9.80%	12/18/2020	V	9.50%	(30)	N	Fully Litigated	7.14%	50.00%	4.75%
Arizona	Tucson Electric Power Co.	FTS	E-1933A-19-0028	10.00%	12/22/2020	V	9.15%	(85)	N	Fully Litigated	7.04%	53.08%	4.86%
Wisconsin	Wisconsin Power and Light Co	LNT	6680-UR-122 (Elec)	N/A	12/23/2020	V	10.00%	N/A	Y	Fully Litigated	7.26%	52.53%	5.25%
Utah	PacifiCorp	BRK.A	20-035-04	9.80%	12/30/2020	V	9.65%	(15)	N	Fully Litigated	7.34%	52.50%	5.07%
Kentucky	Kentucky Power Co.	AEP	C-2020-00174	10.00%	1/13/2021	V	9.30%	(70)	Y	Fully Litigated	6.19%	43.25%	4.02%
North Carolina	Duke Energy Carolinas LLC	DUK	D-E-7, Sub 1214	10.50% μ	3/31/2021	V	9.60%	(90)	Y	Settled	7.04%	52.00%	4.99%
North Carolina	Duke Energy Progress LLC	DUK	D-E-2, Sub 1219	10.50% μ	4/16/2021	V	9.60%	(90)	Y	Settled	6.92%	52.00%	4.99%
Florida	Duke Energy Florida LLC	DUK	D-20210016-EI	9.85%	5/4/2021	V	9.85%	-	Y	Settled	N/A	N/A	N/A
Wyoming	PacifiCorp	BRK.A	20000-578-ER-20	9.80%	5/18/2021	V	9.50%	(30)	N	Fully Litigated	7.19%	51.00%	4.85%
District of Columbia	Potomac Electric	EXC	FC-1156	9.70%	6/4/2021	D	9.28%	(42)	Y	Fully Litigated	7.17%	50.68%	4.70%
Maryland	Potomac Electric Power Co.	EXC	C-9655	10.20%	6/23/2021	V	9.55%	(65)	Y	Fully Litigated	7.21%	50.50%	4.82%
New Mexico	El Paso Electric Co.		C-20-00104-UT	10.30%	6/28/2021	D	9.00%	(130)	N	Fully Litigated	7.18%	49.21%	4.43%
Kentucky	Kentucky Utilities Co.	PPL	C-2020-00349	10.00%	6/30/2021	V	9.43%	(57)	N	Settled	N/A	N/A	N/A
Kentucky	Louisville Gas & Electric Co.	PPL	C-2020-00350 (elec.)	10.00%	6/30/2021	V	9.43%	(57)	N	Settled	N/A	N/A	N/A
New Jersey	Atlantic City Electric Co.	EXC	D-ER20120746	10.30%	7/14/2021	D	9.60%	(70)	Y	Settled	6.99%	50.21%	4.82%
South Carolina	Dominion Energy South Carolina	D	D-2020-125-E	10.25%	7/21/2021	V	9.50%	(75)	Y	Settled	N/A	51.62%	4.90%
Delaware	Delmarva Power & Light Co.	EXC	D-20-0149	10.30%	8/5/2021	D	9.60%	(70)	Y	Fully Litigated	6.80%	N/A	N/A

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
								(8) - (5)					(8) X (13)
North Dakota	Northern States Power Co.	XEL	C-PU-20-441	10.20%	8/18/2021	V	9.50%	(70)	N	Settled	6.97%	52.50%	4.99%
Vermont	Green Mountain Power Corp.		21-1963-TF	8.57%	8/31/2021	V	8.57%	-	N	Fully Litigated	6.67%	50.42%	4.32%
Idaho	Avista Corp.	AVA	C-AVU-E-21-01	9.90%	9/1/2021	V	9.40%	(50)	Y	Settled	7.05%	50.00%	4.70%
Washington	Avista Corp.	AVA	D-UE-200900	9.90%	9/27/2021	V	9.40%	(50)	Y	Settled	7.12%	48.50%	4.56%
Florida	Tampa Electric Co.	EMA	D-20210034-EI	10.75%	10/21/2021	V	9.95%	(80)	N	Settled	6.26%	45.07%	4.48%
Florida	Florida Power & Light Co.	NEE	D-20210015-EI	11.50%	10/26/2021	V	10.60%	(90)	Y	Settled	N/A	N/A	N/A
Maine	Versant Power		D-2020-00316	9.35%	10/28/2021	D	9.35%	-	N	NA	6.57%	49.00%	4.58%
Arizona	Arizona Public Service Co.	PNW	D-E-01345A-19-0236	10.00%	11/2/2021	V	8.70%	(130)	Y	Settled	6.62%	54.67%	4.76%
Minnesota	Otter Tail Power Co.	OTTR	D-E-017/GR-20-719	10.20%	11/4/2021	V	9.48%	(72)	Y	Fully Litigated	7.18%	52.50%	4.98%
Ohio	Ohio Power Co.	AEP	C-20-0585-EL-AIR	10.15%	11/17/2021	D	9.70%	(45)	Y	Settled	7.28%	43.43%	4.21%
New York	Central Hudson Gas & Electric	FTS	C-20-E-0428	9.10%	11/18/2021	D	9.00%	(10)	N	Settled	6.48%	50.00%	4.50%
Texas	Southwestern Electric Power Co	AEP	D-51415	10.35%	11/18/2021	V	9.25%	(110)	Y	Fully Litigated	6.69%	49.37%	4.57%
Virginia	Virginia Electric & Power Co.	D	C-PUR-2021-00058	10.80%	11/18/2021	V	9.35%	(145)	Y	Settled	6.92%	51.92%	4.85%
Wisconsin	Madison Gas and Electric Co.	MGEE	D-3270-UR-124 (Elec)	9.80%	11/23/2021	V	9.80%	-	Y	Settled	7.18%	55.00%	5.39%
Wisconsin	Northern States Power Co.	XEL	D-4220-UR-125 (Elec)	10.00%	11/18/2021	V	10.00%	-	N	Settled	7.31%	52.50%	5.25%
Wisconsin	Wisconsin Power and Light Co	LNT	D-6680-UR-123 (Elec)	10.00%	11/18/2021	V	10.00%	-	Y	Settled	7.48%	52.50%	5.25%
Illinois	Commonwealth Edison Co.	EXC	D-21-0367	7.36%	12/1/2021	D	7.36%	-	Y	Fully Litigated	5.72%	48.70%	3.58%
Illinois	Ameren Illinois	AEE	D-21-0365	7.36%	12/13/2021	D	7.36%	-	Y	Fully Litigated	5.78%	51.00%	3.75%
New Jersey	Rockland Electric Company	ED	D-ER21050823	10.00%	12/15/2021	D	9.60%	(40)	N	Settled	7.08%	48.51%	4.66%
Michigan	Consumers Energy Co.	CMS	C-U-20963	10.50%	12/22/2021	V	9.90%	(60)	Y	Fully Litigated	5.62%	41.84%	4.14%
Oklahoma	Public Service Co. of OK	AEP	Ca-PUD202100055	10.00%	12/28/2021	V	9.40%	(60)	Y	Settled	6.74%	N/A	N/A
New York	Niagara Mohawk Power Corp.	NG.	C-20-E-0380	9.50%	1/20/2022	D	9.00%	(50)	N	Settled	6.08%	48.00%	4.32%
New Mexico	Southwestern Public Service Co	XEL	C-20-00238-UT	10.35%	2/16/2022	V	9.35%	(100)	N	Settled	7.07%	54.72%	5.12%
Indiana	Indiana Michigan Power Co.	AEP	Ca-45576	10.00%	2/23/2022	V	9.70%	(30)	Y	Settled	5.78%	40.70%	3.95%
Colorado	Public Service Co. of CO	XEL	D-21AL-0317E	10.00%	3/16/2022	V	9.30%	(70)	N	Settled	6.82%	55.69%	5.18%
New York	Orange & Rockland Utlts Inc.	ED	C-21-E-0074	9.50%	4/14/2022	D	9.20%	(30)	N	Settled	6.77%	48.00%	4.42%
New Hampshire	Unitil Energy Systems Inc.	UTL	D-DE-21-030	10.00%	5/12/2022	D	9.20%	(80)	N	Settled	7.42%	50.00%	4.60%
Oregon	Portland General Electric Co.	POR	D-UE-394	9.50%	4/25/2022	V	9.50%	-	N	Settled	6.81%	52.00%	4.94%
Arkansas	Southwestern Electric Power Co	AEP	D-21-070-U	10.35%	5/23/2022	V	9.50%	(85)	Y	Fully Litigated	4.74%	44.54%	4.23%
Texas	El Paso Electric Co.		D-52195	10.30%	9/15/2022	V	9.35%	(95)	N	Settled	7.50%	51.00%	4.77%
Vermont	Green Mountain Power Corp.		C-22-0175-TF	8.57%	8/31/2022	V	8.57%	-	N	Fully Litigated	6.30%	49.98%	4.28%
Oklahoma	Oklahoma Gas and Electric Co.	OGGE	Ca-PUD202100164	10.20%	9/8/2022	V	9.50%	(70)	Y	Settled	N/A	53.37%	5.07%
Tennessee	Kingsport Power Company	AEP	D-21-00107	10.20%	10/25/2022	V	9.50%	(70)	Y	Settled	6.02%	48.90%	4.65%
Illinois	Commonwealth Edison Co.	EXC	D-22-0302	7.85%	11/17/2022	D	7.85%	-	Y	Fully Litigated	5.94%	49.45%	3.88%
Michigan	DTE Electric Co.	DTE	C-U-20836	10.25%	11/18/2022	V	9.90%	(35)	N	Fully Litigated	5.42%	39.62%	3.92%
Massachusetts	NSTAR Electric Co.	ES	DPU 22-22	10.50%	11/30/2022	D	9.80%	(70)	N	Fully Litigated	7.06%	53.21%	5.21%
Illinois	Ameren Illinois	AEE	D-22-0297	7.85%	12/1/2022	D	7.85%	-	Y	Fully Litigated	5.90%	50.00%	3.93%
Maryland	Delmarva Power & Light Co.	EXC	C-9681	10.25%	12/14/2022	D	9.60%	(65)	Y	Settled	6.62%	50.50%	4.85%
Ohio	Duke Energy Ohio Inc.	DUK	C-21-0887-EL-AIR	10.30%	12/14/2022	D	9.50%	(80)	Y	Settled	6.86%	50.50%	4.80%
Ohio	The Dayton Power & Light Co.	AES	C-20-1651-EL-AIR	10.50%	12/14/2022	D	10.00%	(50)	N	Fully Litigated	7.43%	53.87%	5.39%
California	Pacific Gas and Electric Co.	PCG	A-22-04-008	11.00%	12/15/2022	V	10.00%	(100)	N	Fully Litigated	7.27%	52.00%	5.20%
California	San Diego Gas & Electric Co.	SRE	A-22-04-012	10.55%	12/15/2022	V	9.95%	(60)	Y	Fully Litigated	7.18%	52.00%	5.17%
California	Southern California Edison Co.	EIX	A-22-04-009	10.53%	12/15/2022	V	10.05%	(48)	Y	Fully Litigated	7.44%	52.00%	5.23%
Oregon	PacifiCorp	BRK.A	D-UE-399	9.80%	12/16/2022	V	9.50%	(30)	N	Settled	7.11%	50.00%	4.75%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company	Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
								(8) - (5)					(8) X (13)	
Georgia	Georgia Power Co.	SO		D-44280	11.00%	12/20/2022	V	10.50%	(50)	Y	Settled	NA	56.00%	5.88%
Wisconsin	Wisconsin Public Service Corp.	WEC		D-6690-UR-127 (Elec)	10.00%	12/22/2022	V	9.80%	(20)	Y	Fully Litigated	N/A	53.00%	5.19%
Washington	Puget Sound Energy Inc.			D-UE-220066	9.90%	12/22/2022	V	9.40%	(50)	N	Settled	7.16%	49.00%	4.61%
Nevada	Sierra Pacific Power Co.	BRK.A		D-22-06014	10.26%	12/27/2022	V	9.56%	(70)	N	Fully Litigated	6.98%	52.40%	5.01%
Wisconsin	Wisconsin Electric Power Co.	WEC		D-5-UR-110 (WEP-Elec)	10.00%	12/29/2022	V	9.80%	(20)	Y	Fully Litigated	N/A	53.00%	5.19%
Oklahoma	Empire District Electric Co.	AQN		Ca-PUD202100163	10.00%	12/29/2022	V	9.30%	(70)	N	Settled	N/A	N/A	N/A
Michigan	Consumers Energy Co.	CMS		C-U-21224	10.25%	1/19/2023	V	9.90%	(35)	Y	Settled	N/A	N/A	N/A
Minnesota	Minnesota Power Entrprs Inc.	ALE		D-E-015/GR-21-335	10.25%	1/23/2023	V	9.65%	(60)	Y	Fully Litigated	7.12%	52.50%	5.07%
Wyoming	Cheyenne Light Fuel Power Co.	BKH		D-20003-214-ER-22	10.30%	1/26/2023	V	9.75%	(55)	Y	Settled	7.48%	52.00%	5.07%
South Carolina	Duke Energy Progress LLC	DUK		D-2022-254-E	10.20%	2/9/2023	V	9.60%	(60)	Y	Settled	6.83%	52.43%	5.03%
Louisiana	Southwestern Electric Power Co	AEP		D-U-35441	10.35%	2/17/2023	V	9.50%	(85)	Y	Settled	N/A	N/A	N/A
Texas	Oncor Electric Delivery Co.	SRE		D-53601	10.30%	3/9/2023	D	9.70%	(60)	Y	Fully Litigated	6.65%	42.50%	4.12%
Michigan	Upper Peninsula Power Co.			C-U-21286	10.80%	3/24/2023	V	9.90%	(90)	N	Settled	N/A	N/A	N/A
California	Liberty Utilities (CalPeco Ele	AQN		A-21-05-017	10.50%	4/27/2023	V	10.00%	(50)	N	Settled	N/A	52.50%	N/A
Maine	Versant Power			D-2022-00255	9.35%	5/31/2023	D	9.35%	-	N	Settled	5.69%	49.00%	4.58%
Minnesota	Northern States Power Co.	XEL		D-E-002/GR-21-630	10.20%	6/1/2023	V	9.25%	(95)	N	NA	NA	52.50%	4.86%
Maine	Central Maine Power Co.	IBE		D-2022-00152	10.20%	6/6/2023	D	9.35%	(85)	N	Withdrawn/Reject	NA	50.00%	4.68%
North Dakota	MDU Resources Group	MDU		C-PU-22-194	10.50%	6/6/2023	V	9.75%	(75)	N	Settled	7.13%	50.81%	4.95%
Entire Period														
# of Decisions				150										
Average	(All Utilities)			10.09%				9.47%	(62)			6.83%	50.15%	4.70%
Average	(Distribution Only)			9.71%				9.15%	(56)			6.77%	49.46%	4.51%
Average	(Vertically Integrated Only)			10.26%				9.61%	(64)			6.87%	50.44%	4.84%
Median	(All Utilities)			10.21%				9.50%				6.98%	50.53%	4.80%
Maximum	(All Utilities)			12.38%				10.60%				7.99%	57.02%	5.88%
Minimum	(All Utilities)			7.36%				7.36%				4.74%	33.71%	3.19%
Oregon				3	9.70%			9.50%	(20)			7.02%	50.67%	4.81%
Applicant Proxy Group					10.10%			9.50%	(60)			6.73%	49.63%	4.70%
Settled					10.19%			9.55%	(63)			6.94%	50.44%	4.80%
Fully Litigated					9.97%			9.37%	(60)			6.71%	49.73%	4.66%
2019														
# of Decisions				33										
Average	(All Utilities)			10.43%				9.64%	(79)			7.02%	50.33%	4.85%
Average	(Distribution Only)			9.95%				9.37%	(58)			7.05%	50.38%	4.70%
Average	(Distribution Only, exc. IL FRP)			10.29%				9.53%	(77)			7.19%	50.94%	4.84%
Average	(Vertically Integrated Only)			10.59%				9.73%	(86)			7.01%	50.32%	4.90%
2020														
# of Decisions				42										
Average	(All Utilities)			10.00%				9.39%	(62)			6.82%	49.77%	4.67%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
								(8) - (5)					(8) X (13)
Average	(Distribution Only)			9.83%			9.10%	(73)			6.79%	49.22%	4.48%
Average	(Distribution Only, exc. IL FRP)			10.07%			9.21%	(86)			6.86%	49.24%	4.54%
Average	(Vertically Integrated Only)			10.10%			9.55%	(56)			6.84%	50.12%	4.78%
2021													
# of Decisions			34										
Average	(All Utilities)			9.93%			9.38%	(55)			6.81%	49.93%	4.64%
Average	(Distribution Only)			9.39%			8.99%	(41)			6.71%	48.97%	4.36%
Average	(Distribution Only, exc. IL FRP)			9.90%			9.39%	(51)			6.94%	48.72%	4.56%
Average	(Vertically Integrated Only)			10.15%			9.54%	(60)			6.87%	50.38%	4.78%
2022													
# of Decisions			29										
Average	(All Utilities)			9.97%			9.45%	(52)			6.65%	50.48%	4.78%
Average	(Distribution Only)			9.58%			9.11%	(47)			6.68%	50.39%	4.60%
Average	(Distribution Only, exc. IL FRP)			10.08%			9.47%	(61)			6.89%	50.58%	4.80%
Average	(Vertically Integrated Only)			10.14%			9.60%	(54)			6.64%	50.52%	4.86%
2023													
# of Decisions			12										
Average	(All Utilities)			10.27%			9.64%	(63)			6.82%	50.47%	4.79%
Average	(Distribution Only)			9.95%			9.47%	(48)			6.17%	47.17%	4.46%
Average	(Distribution Only, exc. IL FRP)			9.95%			9.47%	(48)			6.17%	47.17%	4.46%
Average	(Vertically Integrated Only)			10.37%			9.70%	(67)			7.14%	52.12%	5.00%

Source: S&P Global Market Intelligence

Last Updated: 6/9/23

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

¥ Weighted to include ratemaking-principles rate base and ROE

μ S&P incorrectly reports this value as 9.6%

Calculation of Revenue Requirement Impact of PGE's Proposed ROE vs. Average ROE Awarded to Vertically Integrated Utilities from 2019-Present

Line No.	Source	Capital Component	Ratio	Cost	Weighted Cost
1	<i>PGE 1000/Liddle-Villadsen/2/Table 1, AJK-3</i>	Long-Term Debt	50.00%	4.32%	2.16%
2		Common Equity	50.00%	9.61%	4.81%
3		WACC with National Average Vertically Integrated ROE			6.97%
4	<i>PGE 201/2</i>	Rate Base		\$	6,290,494,000
5	3 x 4	Return on Rate Base at National Average ROE			\$ 438,140,396
6	<i>PGE 1000/Liddle-Villadsen/2/Table 1</i>	Long-Term Debt	50.00%	4.32%	2.16%
7		Common Equity	50.00%	9.80%	4.90%
8		Rate of Return at Requested ROE			7.06%
9	<i>PGE 201/2</i>	Rate Base		\$	6,290,494,000
10	8 x 9	Return on Rate Base with Proposed ROE			\$ 444,014,519
11	10- 5	Difference in Return on Rate Base			\$ 5,874,123
12	<i>PGE/201/3</i>	Gross Up Factor			1.3694
13	11 x 12	Difference in Revenue Requirement			\$ 8,044,024
14	<i>PGE 201/1</i>	Proposed Revenue Deficiency			\$ 337,807,000
15	13 / 14	Difference as a Percent of Proposed Revenue Deficiency			2.4%