

**GOVERNMENT OF PUERTO RICO  
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU**

**NEPR**

**Received:**

**Sep 2, 2025**

**6:35 PM**

**IN RE:** PUERTO RICO ELECTRIC  
POWER AUTHORITY RATE REVIEW

**CASE NO:** NEPR-AP-2023-0003

**SUBJECT:** Walmart's Motion to Submit  
Answer Testimony and Exhibits of Steve W.  
Chriss

**MOTION TO SUBMIT ANSWER TESTIMONY  
AND EXHIBITS OF STEVE W. CHRISS**

**TO THE HONORABLE ENERGY BUREAU:**

**COMES NOW**, Wal-Mart Puerto Rico, Inc. ("Wal-Mart") through its undersigned counsel of records and respectfully states and requests the following:

1. On August 21<sup>st</sup>, 2025, the Hearing Examiner in the instant case issued a Resolution and Order establishing the deadline for intervening parties to submit answering testimony (the "August 21<sup>st</sup> R&O").
2. Consistent with the August 21<sup>st</sup> R&O, Wal-Mart hereby submits for the record its answering testimony by Steve W. Chriss, Senior Director, Utility Partnerships for Walmart Inc, on behalf of Wal-Mart, as **Exhibit 1.0** of this motion. Mr. Chriss's testimony addresses issues related to revenue requirement, cost of service, revenue allocation, rate design, and electric vehicle rates, and incorporates a Spanish-language summary to satisfy the accessibility requirements established in the Hearing Examiner's Resolution and Order dated May 9, 2025.

**WHEREFORE**, Walmart respectfully requests that the Energy Bureau take notice of and grant Walmart's Motion to Submit Answer Testimony and Exhibits of Steve W. Chriss

Respectfully submitted, on September 2, 2025, in San Juan, Puerto Rico.

**Motion to Submit Answer Testimony and Exhibits of Steve W. Chriss**

**September 2, 2025**

**Page 2**

**WE HEREBY CERTIFY** that this motion was filed using the Energy Bureau's electronic filing system and that electronic copies of this motion will be notified to the Hearing Examiner. Scott Hempling, via [shempling@scotthemplinglaw.com](mailto:shempling@scotthemplinglaw.com); and to the attorneys of the parties of record. To wit, to LUMA through Margarita Mercado - [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); Carolyn Clarkin - [carolyn.clarkin@us.dlapiper.com](mailto:carolyn.clarkin@us.dlapiper.com); and Andrea Chambers - [andrea.chambers@us.dlapiper.com](mailto:andrea.chambers@us.dlapiper.com); the Puerto Rico Electric Power Authority through Mirelis Valle-Cancel - [mvalle@gmlex.net](mailto:mvalle@gmlex.net); Juan González- [jgonzalez@gmlex.net](mailto:jgonzalez@gmlex.net); and Alexis G. Rivera Medina - [arivera@gmlex.net](mailto:arivera@gmlex.net); and to Genera PR, LLC, through Jorge Fernández-Reboredo - [jfr@sbqblaw.com](mailto:jfr@sbqblaw.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); and [legal@genera-pr.com](mailto:legal@genera-pr.com).

A courtesy copy of this motion will also be notified to the following:

jmartinez@gmlex.net; nzayas@gmlex.net; Gerard.Gil@ankura.com;  
Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; katuska.bolanos-  
lugo@us.dlapiper.com; Yahaira.delarosa@us.dlapiper.com; mvazquez@vvlawpr.com;  
gvilanova@vvlawpr.com; ratecase@genera-pr.com; hriviera@jrsp.pr.gov;  
gerardo\_cosme@solartekpr.net; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com;  
Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidhouse.com;  
Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com;  
Intisarul.Islam@weil.com; kara.smith@weil.com; rafael.ortiz.mendoza@gmail.com;  
rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law;  
lgnq2021@gmail.com; jan.albinolopez@us.dlapiper.com; Rachel.Albanese@us.dlapiper.com;  
varoon.sachdev@whitecase.com; javrua@sesapr.org; Brett.ingerman@us.dlapiper.com;  
brett.solberg@us.dlapiper.com; agraitfe@agraitlawpr.com; jpouroman@outlook.com;  
epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com;  
Robert.berezin@weil.com; Gabriel.morgan@weil.com; corey.brady@weil.com;  
lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com;  
ccolumbres@whitecase.com; isaac.glassman@whitecase.com; tmacwright@whitecase.com;  
jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com;  
hburgos@cabprlaw.com; dperez@cabprlaw.com; howard.hawkins@cwt.com;  
mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com;  
zack.schrieber@cwt.com; thomas.curtin@cwt.com; escalera@reichardescalera.com;  
riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com;  
erickay@quinnemanuel.com; dmonserrate@msglawpr.com; fgierbolini@msglawpr.com;  
rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com;  
David.herman@dechert.com; Isaac.Stevens@dechert.com; James.Moser@dechert.com;  
Kayla.Yoon@dechert.com; Julia@londoneconomics.com; Brian@londoneconomics.com;  
luke@londoneconomics.com; juan@londoneconomics.com; mmcgill@gibsondunn.com;  
LSheffer@gibsondunn.com; jnieves@cstlawpr.com; arrivera@nuenergypr.com;  
apc@mcpvpr.com; ramonluisnieves@rlnlegal.com;

**Motion to Submit Answer Testimony and Exhibits of Steve W. Chriss**

**September 2, 2025**

**Page 3**

PREB Consultants:

rsmithla@aol.com;                      guy@maxetaenergy.com;                      jorge@maxetaenergy.com;  
rafael@maxetaenergy.com;                      dawn.bisdorf@gmail.com;                      msdady@gmail.com;  
mcranston29@gmail.com;                      ahopkins@synapse-energy.com;                      clane@synapse-energy.com;  
kbailey@acciongroup.com;                      zachary.ming@ethree.com;                      PREBconsultants@acciongroup.com;  
carl.pechman@keylogic.com;                      bernard.neenan@keylogic.com;                      tara.hamilton@ethree.com;  
aryeh.goldparker@ethree.com;                      roger@maxetaenergy.com;                      Shadi@acciongroup.com

**McCONNELL VALDÉS LLC**

*Counsel for Wal-Mart Puerto Rico, Inc.*  
PO Box 364225

San Juan, Puerto Rico 00936-4225

270 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918

[www.mcvpr.com](http://www.mcvpr.com)

*s/Carlos J. Fernández Lugo*

Carlos J. Fernández Lugo

PR Supreme Court ID No.11033

[cfl@mcvpr.com](mailto:cfl@mcvpr.com)

(787) 250-5669

*s/André J. Palerm Colón*

André J. Palerm Colón

PR Supreme Court ID No. 21196

[apc@mcvpr.com](mailto:apc@mcvpr.com)

(787) 250-5636

# **EXHIBIT 1.0**

**GOVERNMENT OF PUERTO RICO  
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU**

**In re: : CASE NO. NEPR-AP-2023-0003  
PUERTO RICO ELECTRIC POWER :  
AUTHORITY RATE REVIEW :**

**ANSWER TESTIMONY AND EXHIBITS OF  
STEVE W. CHRISS  
SENIOR DIRECTOR, UTILITY PARTNERSHIPS, WALMART INC.  
SEPTEMBER 2, 2025**

## Contents

Introduction.....	1
Purpose of Testimony and Summary of Recommendations.....	4
Revenue Requirement.....	10
Cost of Service and Revenue Allocation .....	15
<i>Production Plant Cost Allocation</i> .....	16
Figure 1. PREPA FY2026 monthly coincident peaks. See LUMA Schedule K-1. ....	19
<i>Remaining Cost Allocation Proposals</i> .....	20
Revenue Allocation .....	20
Table 1. PREPA Proposed Revenue Allocations for FY2026, FY2027, and FY2028.....	23
General Service Transmission Rate Design .....	24
Table 2. Percent of Proposed GST Base Revenue Recovered Through Customer, Demand, and Energy Charges.....	29
Schedule P-2 Request – Combining Customer Classes .....	30
CILT and SUBA Riders Rate Design .....	32
Customer Experience Budget .....	34
Public EV Charging.....	35

## Exhibits

**Exhibit 1.01:** Witness Qualifications Statement

**Exhibit 1.02:** Derivation of Percentage Revenue Recovery by Function, General Service at Transmission Voltage

**Summary of the Prepared Answer Testimony of  
Steve W. Chriss  
On Behalf of  
Wal-Mart Puerto Rico, Inc.**

Steve W. Chriss is the Senior Director, Utility Partnerships for Walmart Inc. Mr. Chriss appears on behalf of Wal-Mart Puerto Rico, Inc. ("WMTPR"). Mr. Chriss's testimony addresses issues related to revenue requirement, cost of service, revenue allocation, rate design, and electric vehicle rates.

Mr. Chriss presents the recommendations of WMTPR, which are summarized as follows:

The Bureau should treat the Constrained Budgets for LUMA and Genera as the starting point in this case and make adjustments upward or downward from those points based on the costs and benefits of the various proposals in this case.

For the purposes of this case, WMTPR does not oppose the use of the Company's proposed 12 coincident peak ("12CP") demand allocator for demand-classified costs. To the extent that the Bureau rejects the energy classification and allocation of production plant costs as proposed by the Company, WMTPR does not oppose the use of the proposed 12CP demand allocator to allocate all production plant costs.

For the purposes of this case, WMTPR does not take a position on the Company's remaining cost allocation proposals at this time. However, to the extent that alternative cost of service methodologies or modifications to the Company's methodology, including alternative production cost allocation methodologies, are proposed by other parties, WMTPR reserves the right to address any such changes in accordance with the Bureau's procedures in this case.

At the Company's proposed revenue requirement increase, WMTPR does not oppose the Company's proposed revenue allocation. If the Bureau approves a revenue requirement lower than that proposed by the Company, it should use the reduction to make some movement of classes towards cost-based rates while ensuring all classes benefit from the revenue requirement reduction.

For the purposes of this case, given the level of rate increase proposed by the Company, WMTPR does not oppose the continuation of the current General Service at Transmission Voltage ("GST") rate structure. However, if Advanced Metering Infrastructure ("AMI") is fully deployed prior to the Company's next rate review and customers have access to their interval data, the Bureau should require the Company to file one or more alternative rate designs in the next review to determine an outcome that best matches the principles of rate design and meets the needs of customers and

the Company.

For the purposes of this case, given the level of rate increase proposed by the Company, at the Company's proposed revenue requirement, WMTPR does not oppose the Company's proposed charges for GST. If the Bureau approves a lower revenue requirement for GST than that proposed by the Company, WMTPR recommends reducing the charges on an equal percentage basis equivalent to the percent reduction in revenue requirement for the class.

WMTPR believes combination of GST and GST-TOU could be an option after customers have access to interval data through AMI metering and pending a comprehensive investigation into GST rates as recommended above. However, given how the statement in Company testimony is written, the Bureau should clarify for the record in this case that General Service at Primary Voltage ("GSP"), GSP-TOU, GST, and GST-TOU should not all be combined together.

WMTPR does not oppose the Company's proposed Contribution in Lieu of Taxes Adjustment Rider ("CILT") and SUBA-HH and SUBA-NHH (together "SUBA") rate design changes for the GSP and GST rate schedules. WMTPR takes no position on whether this change is appropriate for other rate schedules, and applying this change to GSP and GST would not impact customers on other rate schedules.

The Bureau should approve the Company's proposal to add five full time equivalent employees ("FTE") to its Customer Programs function.

The Bureau should require the Company to work with interested stakeholders to develop a new Electric Vehicle ("EV") rate specifically for public-facing Direct Current Fast Charging ("DCFC") EV chargers as part of its EV Implementation Support plan for FY 2026-2028.



**Resumen del Testimonio de Contestación de  
Steve W. Chriss  
en representación de  
Wal-Mart Puerto Rico, Inc.**

Steve W. Chriss es el Director Senior de Alianzas con Utilidades (“Utility Partnerships”) de Walmart Inc. El Sr. Chriss comparece en representación de Wal-Mart Puerto Rico, Inc. (en adelante, “WMTPR”). El testimonio del Sr. Chriss aborda asuntos relacionados con el requerimiento de ingresos (“revenue requirement”), el costo del servicio (“cost of service”), la asignación de ingresos (“revenue allocation”), el diseño tarifario (“rate design”) y las tarifas para vehículos eléctricos.

El Sr. Chriss presenta las recomendaciones de WMTPR, que se resumen a continuación:

El Negociado debe tratar los Presupuestos Restringidos (“Constrained Budgets”) de LUMA y Genera como el punto de partida en este caso y realizar ajustes al alza o a la baja a partir de esos puntos con base en los costos y beneficios de las distintas propuestas en este caso.

Para propósitos de este caso, WMTPR no se opone al uso del asignador de demanda (“demand allocator”) de 12 picos coincidentes (“coincident peak”) (en adelante, “12CP”) propuesto por la Compañía para los costos clasificados como de demanda. En la medida en que el Negociado rechace la clasificación por energía y la asignación de los costos de planta de producción según propuesto por la Compañía, WMTPR no se opone al uso del asignador de demanda 12CP propuesto para asignar todos los costos de planta de producción.

Para los fines de este caso, WMTPR no asume una posición sobre las propuestas restantes de asignación de costos de la Compañía en este momento. No obstante, en la medida en que otras partes propongan metodologías alternativas de costo del servicio o modificaciones a la metodología de la Compañía, incluidas metodologías alternativas de asignación de costos de producción, WMTPR se reserva el derecho de abordar cualquiera de dichos cambios conforme a los procedimientos del Negociado en este caso.

Respecto al aumento propuesto por la Compañía del requerimiento de ingresos, WMTPR no se opone a la asignación de ingresos propuesta por la Compañía. Si el Negociado aprueba un requerimiento de ingresos menor al propuesto por la Compañía, debe utilizar la reducción para acercar algunas clases a tarifas basadas en costos, asegurando a la vez que todas las clases se beneficien de la

reducción del requerimiento de ingresos.

Para los fines de este caso, dado el nivel de aumento tarifario propuesto por la Compañía, WMTPR no se opone a la continuación de la estructura tarifaria actual de Servicio General a Voltaje de Transmisión (en adelante, “GST”). Sin embargo, si la Infraestructura Avanzada de Medición (en adelante, “AMI”) se despliega por completo antes de la próxima revisión tarifaria de la Compañía y los clientes tienen acceso a sus datos de intervalos, el Negociado debe exigir a la Compañía que presente uno o más diseños tarifarios alternos en la próxima revisión a fin de determinar un resultado que se ajuste mejor a los principios del diseño tarifario y satisfaga las necesidades de los clientes y de la Compañía.

Para los fines de este caso, dado el nivel de aumento tarifario propuesto por la Compañía, bajo el requerimiento de ingresos propuesto por la Compañía, WMTPR no se opone a los cargos propuestos por la Compañía para GST. Si el Negociado aprueba para GST un requerimiento de ingresos menor al propuesto por la Compañía, WMTPR recomienda reducir los cargos en un porcentaje igual al porcentaje de reducción del requerimiento de ingresos para la clase.

WMTPR considera que la combinación de GST y GST-TOU podría ser una opción una vez los clientes tengan acceso a los datos de intervalos mediante medición AMI y sujeto a una investigación integral de las tarifas GST como se recomendó anteriormente. Sin embargo, dado cómo está redactada la declaración en el testimonio de la Compañía, el Negociado debe aclarar para el récord en este caso que Servicio General a Voltaje Primario (en adelante, “GSP”), GSP-TOU, GST y GST-TOU no deben combinarse todos entre sí.

WMTPR no se opone a los cambios propuestos por la Compañía al Ajustador por Contribución en Lugar de Impuestos (en adelante, “CILT”) y a SUBA-HH y SUBA-NHH (conjuntamente, “SUBA”) en el diseño tarifario de las tarifas GSP y GST. WMTPR no toma posición sobre si este cambio es apropiado para otras tarifas, y la aplicación de este cambio a GSP y GST no impactaría a los clientes bajo otras tarifas.

El Negociado debe aprobar la propuesta de la Compañía de añadir cinco empleados equivalentes a tiempo completo (en adelante, “FTE”) a su función de Programas para Clientes.

El Negociado debe exigir que la Compañía trabaje con las partes interesadas para desarrollar una nueva tarifa de Vehículos Eléctricos (en adelante, “VE”) específicamente para cargadores de VE de Carga Rápida en Corriente Directa (en adelante, “DCFC”) de acceso público, como parte de su plan de Apoyo a la

Implementación de VE para los años fiscales 2026–2028.

1   **Introduction**

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

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

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

8       A.     I am testifying on behalf of Wal-Mart Puerto Rico, Inc. ("WMTPR")

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

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

23            2023. My Witness Qualifications Statement is attached as Exhibit WMTPR  
24            1.01.

25       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**  
26               **PUERTO RICO ENERGY BUREAU (“BUREAU”)?**

27       A.     No.

28       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**  
29               **STATE REGULATORY COMMISSIONS?**

30       A.     Yes. I have submitted testimony in over 290 proceedings before 43 other  
31               utility regulatory commissions. I have also submitted testimony before  
32               legislative committees in six states. My testimony has addressed topics  
33               including, but not limited to, cost of service and rate design, return on equity,  
34               revenue requirements, ratemaking policy, net metering, community solar,  
35               large customer renewable programs, qualifying facility rates,  
36               telecommunications deregulation, resource certification, energy  
37               efficiency/demand side management, fuel cost adjustment mechanisms,  
38               decoupling, and the collection of cash earnings on construction work in  
39               progress.

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

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

42 **Q. PLEASE BRIEFLY DESCRIBE WMTPR'S OPERATIONS WITHIN THE**  
43 **SERVICE TERRITORY OF PUERTO RICO ELECTRIC POWER**  
44 **AUTHORITY, COMPOSED OF LUMA ENERGY SERVCO, LLC, LUMA**  
45 **ENERGY LLC (COLLECTIVELY "LUMA"), GENERA PR LLC**  
46 **("GENERA"), AND PREPA (IN TOTAL "PREPA" OR "COMPANY").<sup>1</sup>**

47 A. WMTPR has 25 retail units, one supply chain facility, and related facilities  
48 served by PREPA.<sup>2</sup> Walmart purchases more than 130 million kWh  
49 annually from the Company, pursuant to the Company's General Service at  
50 Transmission Voltage ("GST") and General Service at Primary Voltage  
51 ("GSP") schedules.

52  
53 **Purpose of Testimony and Summary of Recommendations**

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

55 A. The purpose of my testimony is to respond to PREPA's Rate Review  
56 Petition, along with supporting testimony and exhibits, and to provide  
57 recommendations to assist the Bureau in its thorough and careful  
58 consideration of the Company's proposals as set forth in its Petition.

59 **Q. DID PREPA FILE A REVISED REVENUE REQUIREMENT IN THIS**  
60 **CASE?**

---

<sup>1</sup> LUMA is the service utility of record and from whom WMTPR receives bills. For the purposes of this testimony, PREPA will serve as a catch-all unless a specific reference to LUMA, PREPA, or Genera PR LLC is warranted.

<sup>2</sup> <https://corporate.walmart.com/about/location-facts/united-states/puerto-rico>

61 A. Yes. On August 28<sup>th</sup>, 2025, PREPA filed a motion submitting a revised  
62 revenue requirement. See Motion Submitting Revised Revenue  
63 Requirement, August 28<sup>th</sup>, 2025. As discussed later in this testimony, the  
64 Company proposes significant increases in revenue requirement from their  
65 initial filing; however, the Company, through this filing, does not update any  
66 other facets of this case. As such, the Bureau should note that WMTPR's  
67 recommendations regarding cost allocation, revenue allocation, and rate  
68 design are based on the Company's initial filing and could potentially be  
69 impacted to the extent that the revenue requirement change has follow-on  
70 effects not presently accounted for in the record.

71 **Q. SHOULD THE BUREAU CONSIDER THE OVERALL IMPACT OF THE**  
72 **COMPANY'S APPLICATION ON CUSTOMERS?**

73 A. Yes. Electricity is a significant operating cost for retailers such as WMTPR  
74 and a significant expense for our customers. When electric rates increase,  
75 the increased cost to retailers can put pressure on consumer prices and on  
76 the other expenses required by businesses to operate. The Commission  
77 should thoroughly and carefully consider the impact on customers in  
78 examining the requested revenue requirement, in addition to all other facets  
79 of this case, to ensure that any increase in the Company's rates is the  
80 minimum amount necessary to provide safe, adequate, and reliable service,  
81 while also providing PREPA with the opportunity to recover its reasonable  
82 and prudent costs and for LUMA and Genera to earn their respective



83           incentive fees.

84       **Q.     PLEASE SUMMARIZE WMTPR'S RECOMMENDATIONS TO THE**  
85       **BUREAU.**

86       A.     WMTPR's recommendations to the Bureau are as follows:

87           1) The Bureau should treat the Constrained Budgets for LUMA and Genera  
88           as the starting point in this case and make adjustments upward or  
89           downward from those points based on the costs and benefits of the  
90           various proposals in this case.

91           2) For the purposes of this case, WMTPR does not oppose the use of the  
92           Company's proposed 12 coincident peak ("12CP") demand allocator for  
93           demand-classified costs. To the extent that the Bureau rejects the  
94           energy classification and allocation of production plant costs as  
95           proposed by the Company, WMTPR does not oppose the use of the  
96           proposed 12CP demand allocator to allocate all production plant costs.

97           3) For the purposes of this case, WMTPR does not take a position on the  
98           Company's remaining cost allocation proposals at this time. However,  
99           to the extent that alternative cost of service methodologies or  
100          modifications to the Company's methodology, including alternative  
101          production cost allocation methodologies, are proposed by other parties,  
102          WMTPR reserves the right to address any such changes in accordance  
103          with the Bureau's procedures in this case.

104          4) At the Company's proposed revenue requirement increase, WMTPR  
105          does not oppose the Company's proposed revenue allocation.

- 106 5) If the Bureau approves a revenue requirement lower than that proposed  
107 by the Company, it should use the reduction to make some movement  
108 of classes towards cost-based rates while ensuring all classes benefit  
109 from the revenue requirement reduction.
- 110 6) For the purposes of this case, given the level of rate increase proposed  
111 by the Company, WMTPR does not oppose the continuation of the  
112 current GST rate structure. However, if Advanced Metering  
113 Infrastructure (“AMI”) is fully deployed prior to the Company’s next rate  
114 review and customers have access to their interval data, the Bureau  
115 should require the Company to file one or more alternative rate designs  
116 in the next review to determine an outcome that best matches the  
117 principles of rate design and meets the needs of customers and the  
118 Company.
- 119 7) For the purposes of this case, given the level of rate increase proposed  
120 by the Company, at the Company’s proposed revenue requirement,  
121 WMTPR does not oppose the Company’s proposed charges for GST. If  
122 the Bureau approves a lower revenue requirement for GST than that  
123 proposed by the Company, WMTPR recommends reducing the charges  
124 on an equal percentage basis equivalent to the percent reduction in  
125 revenue requirement for the class.
- 126 8) WMTPR believes combination of GST and GST-TOU could be an option  
127 after customers have access to interval data through AMI metering and

pending a comprehensive investigation into GST rates as recommended above. However, given how the statement in Company testimony is written, the Bureau should clarify for the record in this case that GSP, GSP-TOU, GST, and GST-TOU should not all be combined together.

9) WMTPR does not oppose the Company's proposed Contribution in Lieu of Taxes Adjustment Rider ("CILT") and SUBA-HH and SUBA-NHH (together "SUBA") rate design changes for the GSP and GST rate schedules. WMTPR takes no position on whether this change is appropriate for other rate schedules, and applying this change to GSP and GST would not impact customers on other rate schedules.

10)The Bureau should approve the Company's proposal to add five full time equivalent ("FTE") to its Customer Programs function.

11)The Bureau should require the Company to work with interested stakeholders to develop a new Electric Vehicle ("EV") rate specifically for public-facing Direct Current Fast Charging ("DCFC") EV chargers as part of its EV Implementation Support plan for FY 2026-2028.

**Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION INDICATE WMTPR'S SUPPORT?**

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

**Revenue Requirement**

**Q. WHAT IS YOUR UNDERSTANDING OF THE RATES TO BE SET IN THIS PROCEEDING?**

A. My understanding is this proceeding shall set permanent rates for FY2026 and projected rates for FY2027 and FY2028. Rates are intended to reflect known and projected costs, including the costs to carry out actions required by the existing Integrated Resource Plan and the Integrated Resource Plan to be filed in Case No. NEPR-AP-2023-0004. See Resolution and Order, February 12, 2025 ("February 12<sup>th</sup> Order"), page 2 to page 3.

**Q. WHAT IS YOUR UNDERSTANDING OF THE UNDERLYING COSTS TO BE ANALYZED TO SET RATES?**

A. My understanding is that the costs to be analyzed to set rates are comprised of separate filings from LUMA, Genera, and PREPA.

**Q. WHAT IS YOUR UNDERSTANDING OF THE GENERAL RESPONSIBILITIES OF EACH ENTITY?**

A. My understanding is that LUMA is responsible for the operation of the transmission and distribution systems, Genera is responsible for the operation of thermal generation, and PREPA is responsible for operation of the hydroelectric and irrigation assets, regulatory compliance, federal grant administration, and oversight of the system's long-term transformation. See PREPA Exhibit 32, page 4, line 11 to line 14, and page 7, line 4 to line 6.

**Q. DOES THE FEBRUARY 12<sup>TH</sup> ORDER REQUIRE LUMA AND GENERA**

**TO FILE TWO PROPOSED BUDGETS?**

A. Yes. LUMA and GENERA are required to file two proposed budgets. The first is the “Optimal Budget,” defined in the Order as having no tradeoffs among activities and every activity receives the necessary costs. The second is the “Constrained Budget,” defined as one where tradeoffs are unavoidable with a revenue requirement that must give LUMA and Genera reasonable opportunities to achieve the metrics that trigger their respective incentive fees. See February 12<sup>th</sup> Order, page 5.

**Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S INITALLY PROPOSED REVENUE REQUIREMENTS BASED ON THE CONSTRAINED CASE?**

A. My understanding is that the Company initially proposed revenue requirements, inclusive of CILT and subsidies, are \$5.1 billion for FY2026, \$5.2 billion for FY2027, and \$5.3 billion for FY2028. See Schedule B-1.1 (Constrained). The proposed revenue requirements are the sum of LUMA’s Constrained Budget, Genera’s Optimal Budget, and PREPA’s budget. See LUMA Exhibit 1.0, page 39, line 707 to line 709. The underlying operating expenses for each fiscal year are \$4.8 billion for FY2026, \$4.9 billion for FY2027, and \$5.0 billion for FY2028. See Schedule B-1.1 (Constrained).

**Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED CHANGES TO THE UNDERLYING OPERATING EXPENSES FILED BY THE COMPANY ON AUGUST 28<sup>TH</sup>?**

194       A.     My understanding is the revised operating expenses are \$5.0 billion for  
195             FY2026, \$5.1 billion for FY2027, and \$5.1 billion for FY2028. See PC-of-  
196             LUMA-FIN-2 Attachment 1.

**Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED REVENUE REQUIREMENT INCREASES INITALLY USED TO SET BASE RATES?**

A. My understanding, per the Company's revenue summary schedules, is that the Company proposes a total revenue requirement increase to be recovered through base rates in FY2026 of \$1.43 billion, or approximately 36 percent above current revenues. See LUMA 2026 Schedule L-1, L-2. For FY2027, the proposed total revenue requirement increase is \$1.64 billion, or approximately 42 percent above current revenues. See LUMA 2027 Schedule L-1, L-2. Finally, for FY2028, the proposed total revenue requirement increase is \$1.66 billion, or approximately 43 percent above current revenues. See LUMA 2028 Schedule L-1, L-2.

**Q. HAS THE COMPANY FILED AN UPDATED SCHEDULE L TO REFLECT THE CHANGES IN THE REQUESTED REVENUE REQUIREMENTS?**

A. No. As such, it is unclear what the follow-on effects of the proposed changes are.

**Q. DOES WMTPR HAVE A CONCERN WITH THE COMPANY'S PROPOSED REVENUE REQUIREMENT INCREASE?**

A. Yes. It is clear that there is much the Company needs to do to improve the quality and resilience of its service. Increased investment is necessary to achieve those improvements; however, the level of the proposed increase to customer bills and impact on affordability is significant, particularly considering that LUMA's proposed starting point is their Constrained



219 Budget scenario, which has a lower proposed cost to customers than their  
220 Optimal Budget.

221 **Q. SHOULD THE STARTING POINT FOR BOTH LUMA AND GENERA BE**  
222 **THE CONSTRAINED BUDGET SCENARIO?**

223 A. Yes, and the Bureau should make adjustments upward or downward from  
224 those points based on the costs and benefits of the various proposals in this  
225 case. Based on Genera's testimony, starting with Constrained Budgets for  
226 both LUMA and Genera would reduce the initial proposed revenue  
227 requirement for FY2026 by approximately \$170 million, FY2027 by  
228 approximately \$200 million, and FY2028 by approximately \$187 million.  
229 See Genera Exhibit 22, page 7.

230  
231 **Cost of Service and Revenue Allocation**

232 **Q. GENERALLY, WHAT IS WMTPR'S POSITION ON SETTING RATES**  
233 **BASED ON THE UTILITY'S COST OF SERVICE?**

234 A. WMTPR advocates that rates be set based on the utility's cost of service for  
235 each rate class. This produces equitable rates that reflect cost causation,  
236 sends proper price signals, and minimizes price distortions.

237 ***Production Plant Cost Allocation***

238 **Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF**  
239 **PRODUCTION PLANT FIXED COST ALLOCATION?**

240 A. Production plant cost allocation is the process of allocating to each  
241 customer class the fixed costs of a utility's generation assets. Fixed costs  
242 are defined as costs that do not vary with the level of output and must be  
243 paid even if there is no output.<sup>3</sup>

244 **Q. DO A UTILITY'S FIXED PRODUCTION PLANT COSTS CHANGE WITH**  
245 **CHANGES IN THE AMOUNT OF ELECTRICITY GENERATED?**

246 A. No. The utility's fixed production plant costs do not change with changes in  
247 the amount of electricity generated. For example, if a generating unit is not  
248 dispatched and produces no energy, the fixed costs are not avoided by the  
249 utility or customers. Generation units can be built and operated for different  
250 reasons, such as lower fuel costs, or reliability, but the way in which a  
251 generation unit is operated does not change the fact that the fixed costs are,  
252 in fact, fixed, and should be treated as such in the production capacity cost  
253 allocation.

254 **Q. IS IT YOUR UNDERSTANDING THAT PRODUCTION PLANT CAPACITY**  
255 **IS SIZED TO MEET THE MAXIMUM DEMAND IMPOSED ON THE**  
256 **SYSTEM BY THE COMPANY'S CUSTOMERS?**

---

<sup>3</sup> Pindyck, Robert S. and Daniel L. Rubinfeld, "Microeconomics", 5<sup>th</sup> ed., 2001, page 206.

257 A. Yes. It is my understanding that the timing and size of a utility's production  
258 plant capacity additions are generally made to meet the maximum demand  
259 placed on the utility's system by all customer classes, also known as its  
260 coincident peak ("CP"). All of a utility's generation units are needed to meet  
261 that demand, and removing any of the units from that stack will limit the  
262 utility's ability to do so.

263 **Q. WHY IS IT IMPORTANT FOR THE ALLOCATION OF PRODUCTION**  
264 **PLANT COST TO RECOGNIZE THAT PRODUCTION CAPACITY IS**  
265 **DESIGNED TO MEET SYSTEM PEAK?**

266 A. Basing the allocation of production plant fixed costs on the utility's system  
267 peak ensures that the resulting rates reflect cost causation and minimizes  
268 cost responsibility shifts between rate classes. Allocation of fixed  
269 production plant costs on a variable, or energy, basis can introduce shifts in  
270 cost responsibility from lower load factor classes to higher load factor  
271 classes. Under an energy allocator, two customer classes can have the  
272 same contribution to system peak demand in the test year and cause the  
273 Company to incur the same amount of fixed cost to meet that demand, but  
274 because one class uses more kWh than the other, that class will pay more  
275 of the demand cost than the class that uses fewer kWh. Additionally, use  
276 of an energy allocator implies that the generation plant to which that  
277 allocator is applied has no fixed cost, which is plainly not the case.

278 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED**

**PRODUCTION PLANT ALLOCATION METHODOLOGY?**

A. My understanding is that while the Company recognizes production plant capacity costs are demand-related, it appears they propose to classify some portion of those costs as energy-related. See LUMA Exhibit 20.00, page 7, line 220 and page 8, line 237 to line 249. Once classified, the Company proposes to allocate demand-classified costs using a 12CP allocator and allocate energy-classified costs using energy consumption by customer class. *Id.*, page 12, line 325 to page 13, line 331.

**Q. DOES WMTPR HAVE CONCERNS WITH THIS METHODOLOGY?**

A. Yes, primarily based on using an energy allocator to allocate production plant costs, given the fixed nature of production plant costs and that those costs are incurred to meet system demands as discussed above.

**Q. IS THE ALLOCATION OF DEMAND-CLASSIFIED PRODUCTION PLANT COSTS ON A COINCIDENT PEAK BASIS A STANDARD PRACTICE IN THE INDUSTRY?**

A. Yes. The 12CP allocator proposed by the Company is one of a family of peak demand methods described in the Electric Utility Cost Allocation Manual published by the National Association of Regulatory Utility Commissioners in January, 1992 ("NARUC Manual"). The manual states that the 12CP allocator can be used if the monthly peaks "lie within a narrow range."<sup>4</sup> Similarly, the multiple coincident peak method can examine all 12

---

<sup>4</sup> NARUC Manual, page 46.

monthly coincident peaks to determine which months drive system peaks for the utility, with a typical threshold for inclusion of coincident peaks within 10 percent of the system peak. *Id.*

**Q. HAVE YOU EXAMINED THE COMPANY'S MONTHLY PEAK DEMANDS?**

A. Yes, as shown in Figure 1 below. Seven of the 12 monthly peaks are within 10 percent of the system peak and the remainder are within 20 percent of the system peak. In my experience I would describe the peaks as falling within the general definition of a narrow range.

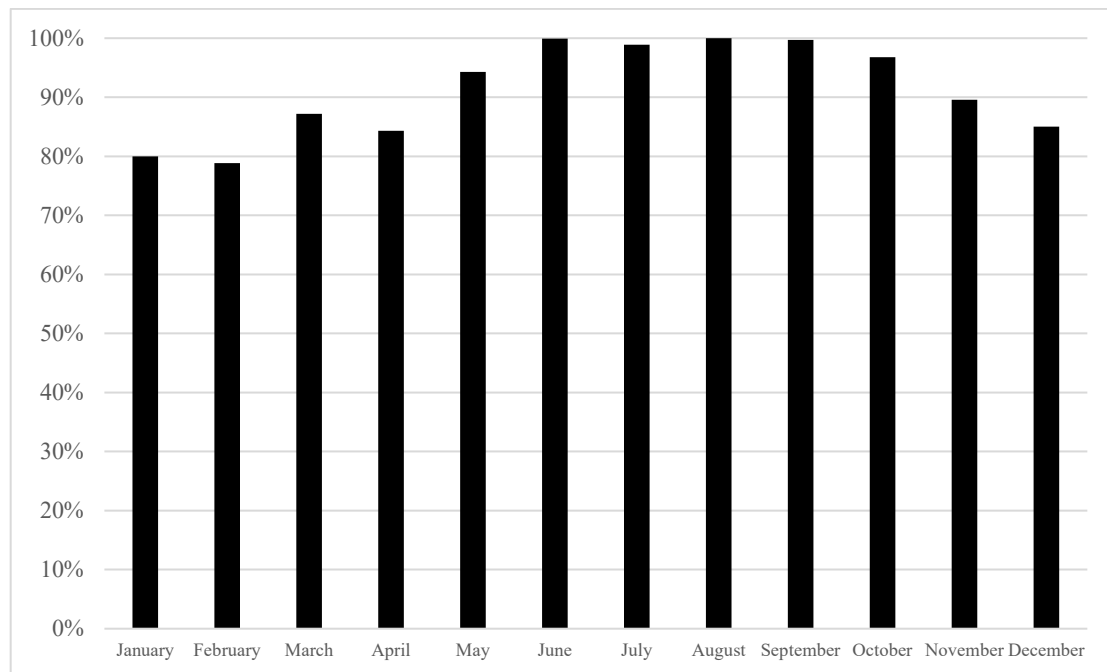


Figure 1. PREPA FY2026 monthly coincident peaks. See LUMA Schedule K-1.

**Q. DOES WMTPR OPPOSE THE COMPANY'S PROPOSED 12CP DEMAND ALLOCATOR FOR ALLOCATION OF DEMAND-CLASSIFIED**

**PRODUCTION COSTS?**

A. No. For the purposes of this case, WMTPR does not oppose the use of the Company's proposed 12CP demand allocator for demand-classified costs. To the extent that the Bureau rejects the energy classification and allocation of production plant costs as proposed by the Company, WMTPR does not oppose the use of the proposed 12CP demand allocator to allocate all production plant costs.

***Remaining Cost Allocation Proposals***

**Q. DOES WMTPR TAKE A POSITION ON THE REMAINING COST ALLOCATION PROPOSALS AT THIS TIME?**

A. For the purposes of this case, WMTPR does not take a position on the Company's remaining cost allocation proposals, at this time. However, to the extent that alternative cost of service methodologies or modifications to the Company's methodology, including alternative production cost allocation methodologies, are proposed by other parties, WMTPR reserves the right to address any such changes in accordance with the Bureau's procedures in this case.

**Revenue Allocation**

**Q. WHAT IS REVENUE ALLOCATION?**

A. Revenue allocation is the assignment of the revenue responsibility to each

337 customer class. A revenue allocation that assigns revenue to each class at  
 338 its cost of service is free of inter-class subsidies. In contrast, where revenue  
 339 is allocated to a class at a level above its cost of service, that rate class is  
 340 subsidizing any rate class that is allocated revenue below its cost of service.

341 **Q. ARE THERE INSTANCES IN WHICH THE BUREAU WOULD ASSIGN**  
 342 **DIFFERENT REVENUE TO INDIVIDUAL CLASSES THAN IS CALLED**  
 343 **FOR WITHIN THE COSS, RESULTING IN INTER-CLASS SUBSIDIES?**

344 A. Yes. At times, the regulator may find it necessary to approve a level of  
 345 revenue requirement to a particular class which differs from the cost  
 346 responsibility amount determined in the cost-of-service study. This is often  
 347 driven by the need to ensure that customers are not seriously adversely  
 348 impacted by major changes to the level of rates. Other reasons can include  
 349 perceived differences in cost of service study results and reality, relative  
 350 risks assigned to classes, social goals associated with the role of the prices  
 351 in a particular jurisdiction, and response to the state of the economy within  
 352 or external to the regulatory jurisdiction. The Bureau may exercise its  
 353 discretion based on one or more of these concerns to adjust revenue  
 354 allocation to support policy or advance the public interest.

355 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S REVENUE**  
 356 **ALLOCATION METHODOLOGY?**

357 A. My understanding is the Company proposes to balance three goals: (1)  
 358 given the size of the increase, no class should receive a rate decrease; (2)



359 low-income residential customer increases should be capped at a maximum  
360 of 30 percent; and (3) no class should receive an increase greater than two  
361 times the overall utility percentage increase. See LUMA Exhibit 20.00, page  
362 19, line 450 to page 20, line 454.

**Q. WHAT ALLOCATION DOES THE COMPANY PROPOSE FOR THE THREE FYs?**

**A.** The Company proposes the allocations as shown in Table 1 below.

**Table 1. PREPA Proposed Revenue Allocations for FY2026, FY2027, and FY2028.**

	FY2026		FY2027		FY2028	
<b>Class</b>	<b>Cost-Based</b>	<b>Proposed</b>	<b>Cost-Based</b>	<b>Proposed</b>	<b>Cost-Based</b>	<b>Proposed</b>
GRS	57.04%	43.1%	68.19%	49.62%	73.68%	58.15%
LRS, RH3, RFR	55.26%	18.52%	65.03%	21.14%	68.96%	26.29%
GSS, USSL, CATV	28.97%	36.55%	34.23%	46.30%	33.63%	43.82%
GSP, TOU-P	31.67%	41.91%	34.34%	48.44%	35.25%	43.81%
GST, TOU-T, LIS, PPBB	6.79%	20.23%	6.22%	20.75%	1.38%	18.96%
PLG, LP-13	16.78%	35.89%	26.86%	38.73%	28.32%	33.89%
GAS	168.76%	39.42%	189.35%	47.16%	196.19%	44.47%
<b>TOTAL</b>	<b>36.40%</b>	<b>36.40%</b>	<b>42.02%</b>	<b>42.02%</b>	<b>42.91%</b>	<b>42.91%</b>

Source: LUMA Exhibit 20.00, Table 4, Table 5, and Table 6

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU AT THE COMPANY'S PROPOSED REVENUE REQUIREMENT INCREASE?**

**A.** At the Company's proposed revenue requirement increase, WMTPR does not oppose the Company's proposed revenue allocation.

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU IF IT**

**APPROVES A LOWER REVENUE REQUIREMENT THAN THAT  
PROPOSED BY THE COMPANY?**

A. If the Bureau approves a revenue requirement lower than that proposed by the Company, it should use the reduction to make some movement of classes towards cost-based rates while ensuring all classes benefit from the revenue requirement reduction.

**General Service Transmission Rate Design**

**Q. IS IT YOUR UNDERSTANDING THAT THE COMPANY HAS PROPOSED  
GST RATES FOR ALL THREE TEST YEARS?**

A. Yes. See LUMA Exhibit 20, page 21, line 485.

**Q. WHAT GENERAL PRINCIPLES DID THE COMPANY EMPLOY IN THE  
DESIGN OF RATES?**

A. The Company states that it attempted to create rates that adhere to the Bonbright principles:

- Simple, understandable, acceptable to the public, and feasible to apply and interpret;
- Effective at yielding authorized revenues;
- Revenue and cash flow stability from year to year;
- Stable, with minimum unexpected changes;
- Cost-based and fair to customers;
- Avoid “undue” discrimination;

393 • Promote the efficient use of energy.<sup>5</sup> *Id.*, page 21, line 492 to page 22,  
394 line 510.

395 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S GENERAL**  
396 **RATE DESIGN OBJECTIVES?**

397 A. Generally the Company seeks to rebalance the proportions of revenues  
398 collected through the customer, demand, and energy charges. *Id.*, line 515  
399 to line 516. For commercial and industrial customers., the Company  
400 attempts to balance the increases in demand and energy charges with  
401 preserving a price signal that lowers the realized cost of energy for high load  
402 factor customers. *Id.*, line 538 to line 540.

403 **Q. WHAT IS YOUR UNDERSTANDING OF THE CURRENT RATE DESIGN**  
404 **FOR GST?**

405 A. My understanding is that GST is currently designed as follows:  
406 • A \$/month customer charge, currently \$450/month;  
407 • An hours-use energy charge structure:  
408 ○ A \$/kWh energy charge applied to the first 300 kWh per kW of  
409 maximum measured demand for the billing month, currently  
410 \$0.0365/kWh; and  
411 ○ A reduced \$/kWh energy charge applied to each additional kWh of  
412 energy use above the first 300 kWh/kW block, currently

---

<sup>5</sup> James C. Bonbright, *Principles of Public Utility Rates*, Columbia University Press (1961).

- 413                   \$0.0325/kWh;
- 414                   • A \$/kVA monthly demand charge applied to the maximum 15 minute
- 415                   measured demand measured in a billing month, converted in to kVA,
- 416                   currently \$7.70/kVA; and
- 417                   • A \$/kVA excess demand charge applied to any amount of billed demand
- 418                   in excess of the contracted load, currently \$9.60/kVA. See LUMA
- 419                   Schedule O-2, page 13.
- 420

**Q. IN YOUR OPINION, IS THE HOURS-USE ENERGY CHARGE STRUCTURE THE MOST SIMPLE AND UNDERSTANDABLE MANNER IN WHICH TO COMMUNICATE ENERGY AND DEMAND PRICE SIGNALS?**

A. No. The hours-use structure is not the simplest manner as it requires the analyst to have more than a surface level understanding of the rate structure in order to understand the interplay of the energy rates and load factor, as well as which demand readings to use for the calculations.

**Q. PLEASE EXPLAIN.**

A. To calculate the kWh applicable to each block, the analyst needs to multiply the maximum measured demand, in kW, by 300. Usage at or below the maximum measured demand multiplied by 300 is charged the first block rate. Any remaining usage is charged the second block rate. However, the demand charges are not billed using the kW demand reading used for blocking – instead the rates are charged on the maximum measured demand converted to kVA. While LUMA deserves credit for providing all the inputs for these calculations on the bill, though not a showing of the calculation itself, this rate structure does not meet the simple and understandable principle of rates noted above.

**Q. DOES THIS RATE STRUCTURE INCENTIVIZE THE EFFICIENT USE OF ENERGY?**

A. Not necessarily. The structure does incentivize higher monthly load factor,

i.e. more kWh consumption per kW of demand, by employing a lower cost for usage over 300 kWh/kW, or a monthly load factor of about 41 percent.<sup>6</sup> This can be achieved by either decreasing demand while holding energy steady, or increasing energy while holding demand steady; however, the structure is agnostic to when the additional energy is used – a customer could increase their load factor through additional usage during system peak hours. Additionally, the marginal cost of energy at monthly load factors above 300 kWh/kW is lower than the marginal cost of energy below that level – energy efficiency or distributed generation deployed by a high load factor customer will have lower value than that deployed by a low load factor customer.

**Q. DOES THE COMPANY PROPOSE ANY CHANGES TO THE STRUCTURE OF GST IN THIS CASE?**

A. No, the Company proposes to continue the structure for the schedule. *Id.*

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU FOR THE GST RATE STRUCTURE?**

A. For the purposes of this case, given the level of rate increase proposed by the Company, WMTPR does not oppose the continuation of the current GST rate structure. However, if AMI is fully deployed prior to the Company's next rate review and customers have access to their interval data, the Bureau should require the Company to file one or more alternative rate

---

<sup>6</sup> 300 hours / 720 hours in a 30 day month = 41.6 percent

designs to determine an outcome that best matches the principles of rate design and meets the needs of customers and the Company.

**Q. WHY IS CUSTOMER ACCESS TO THEIR INTERVAL DATA IMPORTANT TO WMTPR AS PART OF A REGULATORY RATE REVIEW?**

A. In my experience, customers are at a distinct disadvantage without their interval data as part of a rate review, particularly if new or changes to time-of-use periods are being explored, because they have no way to accurately calculate the actual impacts to their bills from any changes made in the proceeding.

**Q. DOES THE COMPANY PROPOSE CHANGES IN THE PROPORTION OF REVENUES RECOVERED THROUGH THE CUSTOMER, DEMAND, AND ENERGY CHARGES?**

A. Yes. As shown in Table 2, the Company shifts the GST rate design through 2028 to recover fewer base revenues, on a percentage basis, through the energy and demand charges and more through the customer charge.

**Table 2. Percent of Proposed GST Base Revenue Recovered Through Customer, Demand, and Energy Charges.**

	Present	FY2026	FY2027	FY2028
Customer Charge	2%	5%	7%	14%
Demand Charges	37%	32%	30%	29%
Energy Charges	61%	63%	63%	57%

Source: WMTPR Exhibit 1.02

**Q. DOES THE COMPANY PROVIDE A FUNCTIONAL COST STUDY FOR**



**GST TO SUPPORT THESE MOVEMENTS?**

A. No. The Company does provide that type of study for Schedules GRS and GSS. See LUMA Schedule K-1.

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU ON THE COMPANY'S PROPOSED CHARGES FOR GST?**

A. For the purposes of this case, given the level of rate increase proposed by the Company, at the Company's proposed revenue requirement, WMTPR does not oppose the Company's proposed charges for GST. If the Bureau approves a lower revenue requirement for GST than that proposed by the Company, WMTPR recommends reducing the charges on an equal percentage basis equivalent to the percent reduction in revenue requirement.

**Schedule P-2 Request – Combining Customer Classes**

**Q. DOES THE COMPANY IDENTIFY ANY POTENTIAL CANDIDATES FOR COMBINATION OF CUSTOMER CLASSES?**

A. Yes. The Company states "...the obvious candidates for combining customer classes are the General Service at Primary Distribution Voltage ("GSP"), GSP-TOU and General Service at Transmission Voltage ("GST"), GST-TOU rates." The rationale is based on having the "same service characteristics" but different tariff structures. See LUMA Exhibit 20.00, page 28, line 659 to page 29, line 663. This statement could be read to state that

503 GSP and its time-of-use counterpart GSP-TOU could be combined.  
504 Similarly and separately, GST, and its time-of-use counterpart GST-TOU  
505 could be combined. However, this is not clear.

**Q. DOES WMTPR HAVE ANY CONCERNS WITH THE COMPANY'S IDENTIFICATION OF CANDIDATES?**

A. Yes, if the Company intends to combine primary and transmission service schedules, given that that primary and transmission rate schedules have distinctly different service characteristics and costs allocated to them in the cost of service study (transmission customers have no primary or secondary costs allocated to them because they do not use those parts of the system). Otherwise, WMTPR believes combination could be an option after customers have access to interval data through AMI metering and pending a comprehensive investigation into GST rates as recommended above. However, given how the statement in Company testimony is written, the Bureau should clarify for the record that GSP, GSP-TOU, GST, and GST-TOU should not all be combined together.

**CILT and SUBA Riders Rate Design**

**Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSAL FOR CILT AND SUBA RIDER RATE DESIGNS?**

A. My understanding is that the Company proposes to move from the current energy charge for each rider to recovery through a fixed monthly charge. See LUMA Exhibit 20.00, page 32, line 748 to line 753.

**Q. HOW DOES THE COMPANY PROPOSE TO STRUCTURE THE RATES**

**IN THE ANNUAL FILINGS FOR EACH RIDER?**

A. The Company proposes to first allocate the revenue requirements for the riders to each customer class via gross energy consumption. Once allocated, the Company proposes to set the rates for each class by dividing the revenue requirement for each class by the number of customers in the class. *Id*, page 33, line 755 to line 758.

**Q. WHEN DOES THE COMPANY PROPOSE TO IMPLEMENT THIS CHANGE?**

A. The Company proposes to implement this change for the 2027 test year. *Id*, line 760 to line 762.

**Q. WHY DOES THE COMPANY PROPOSE THIS CHANGE?**

A. The Company appears to propose this change to equalize the amounts paid by customers using different amounts of energy each month and to increase the contribution to CILT and SUBA costs from net metering customers. *Id*, line 764 to line 772.

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU ON THIS ISSUE?**

A. WMTPR does not oppose the Company's proposed CILT and SUBA rate design changes for the GSP and GST rate schedules. WMTPR takes no position on whether this change is appropriate for other rate schedules, and applying this change to GSP and GST would not impact customers on other rate schedules.

**Customer Experience Budget**

**Q. DOES THE COMPANY EMPLOY KEY ACCOUNT REPRESENTATIVES TO WORK WITH THEIR LARGE CUSTOMERS?**

A. Yes. As part of the Company's Optimal Budget proposal, the Company proposes to add five FTE to the Customer Programs function, which includes Key Accounts, Business Transformation, and Utility Transformation functions. The Company proposes these roles to continue developing operational relationships with their largest customers and ensure appropriate support of critical distributed generation and demand programs. See LUMA Exhibit 7.00, page 25, line 505 to line 509.

**Q. DOES WMTPR SUPPORT THIS REQUEST EVEN THOUGH IT IS PART OF THE COMPANY'S PROPOSED OPTIMAL BUDGET?**

A. Yes. A utility key account representative plays a vital role in the customer-utility relationship by providing a single point of contact at the utility for day-to-day operational and technical support, updates on rates and utility programs, support during emergencies such as hurricanes, and a conduit for customer-utility communications on broader strategic opportunities, such as the aforementioned distributed generation and demand programs. For WMTPR, in particular, which generally maintains multiple sites within a utility's service territory, it also ensures a single, consistent message applicable to all of its operations. By reducing administrative delays and avoiding duplicative efforts, a dedicated point of contact and structural

support for that function within the utility enhances both responsiveness and overall service reliability – which benefits our customers, associates, and communities. A top-notch account representative is practically a member of the customer's energy management team and an advocate for the customer within the utility organization.

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU ON THIS ISSUE?**

A. The Bureau should approve the Company's proposal to add five FTE to its Customer Programs function.

**Public EV Charging**

**Q. DOES THE COMPANY CURRENTLY OFFER A RATE SPECIFICALLY FOR PUBLIC DCFC EV CHARGING?**

A. To the best of my knowledge, the Company does not currently offer rates specifically for public DCFC EV charging.

**Q. DOES THE COMPANY APPEAR TO OFFER A PUBLIC EV CHARGING RATE AS PART OF ITS EV IMPLEMENTATION SUPPORT PLAN FOR FY 2026-2028 IN THIS CASE?**

A. No. It does not appear that the Company is proposing to offer, as part of its EV implementation support plan, a rate structure specifically for customers who are interested in owning and operating public EV charging equipment, specifically DCFC. See LUMA Exhibit 7.05.

593 **Q. DOES WMTPR SUPPORT THE NEED FOR PUBLIC EV RATE DESIGN**  
594 **IN PUERTO RICO?**

595 A. Yes, WMTPR supports public EV charging rates that are specifically  
596 designed for public charging at third-party locations.

597 **Q. WHY DOES WMTPR BELIEVE THAT THE COMPANY SHOULD OFFER**  
598 **A RATE FOR THIRD-PARTY OWNED PUBLIC DCFCs?**

599 A. Building out a robust public EV charging network is a key component to  
600 supporting the EV industry as a whole and encouraging EV adoption by  
601 eliminating range anxiety and other challenges that EV drivers face when  
602 needing to charge their vehicle as compared to traditional internal  
603 combustion vehicles. Increasing the number of EV chargers, including  
604 public-facing DCFCs, is needed in the Company's service territory. To  
605 accomplish this, additional initiatives and rate structures are needed to fully  
606 develop a public DCFC network. Specifically, as discussed in more detail  
607 below, an important component to third-party investment in public EV  
608 chargers is the availability of EV-specific rate options for public DCFCs.

609 **Q. DOES WALMART INC. HAVE EXPERIENCE IN THE EV CHARGING**  
610 **SPACE?**

611 A. Yes, Walmart has substantial experience with offering EV charging to its  
612 customers and is actively growing its presence in the EV charging space.  
613 Specifically, Walmart currently hosts more than 1,200 public DCFCs at 285  
614 different locations across 43 states. As announced recently, Walmart

615 intends to build its own EV fast charging network at thousands of Walmart  
 616 and Sam's Club locations across the U.S. over the next few years.<sup>7</sup>  
 617 Walmart retail sites are ideally situated for EV charging stations because of  
 618 their large parking lots, easy public access, and multi-site locations.

619 **Q. ARE WALMART-OWNED AND OPERATED CHARGERS NOW**  
 620 **AVAILABLE TO THE PUBLIC?**

621 A. Yes. Walmart opened its first Walmart-owned and operated charging  
 622 station in McKinney, Texas<sup>8</sup> in March 2023, and since then we have opened  
 623 several more stations in the Dallas area and Oklahoma. The base  
 624 configuration of our charging stations is eight stalls supplied by four 400 kW  
 625 units with two handles each. Depending on the site, additional units may  
 626 be added.

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

629 A. As part of its renewable energy and carbon reduction efforts, Walmart is  
 630 committed to supporting EV adoption by providing EV charging stations in  
 631 thousands of locations that not only serve EV customers who reside and/or  
 632 work nearby but that also advance the nationwide EV infrastructure.  
 633 Further, Walmart is proud to offer EV charging as a convenience to its

---

<sup>7</sup> Vishal Kapadia, *Leading the Charge: Walmart Announces Plan to Expand Electric Vehicle Charging Network*, Walmart (Apr. 6, 2023), <https://corporate.walmart.com/newsroom/2023/04/06/leading-the-charge-walmart-announces-plan-to-expand-electric-vehicle-charging-network>.

<sup>8</sup> <https://www.walmart.com/store/206-mckinney-tx/ev-charging-station>



customers who currently own EVs and for future EV owners. Building an EV charging infrastructure that serves local communities, both large and small, as well as corridors located within states and throughout the country, is critical as vehicle owners consider their options when purchasing a new vehicle.

**Q. ARE ELECTRIC RATES A FACTOR THAT WALMART CONSIDERS WHEN INSTALLING OR SITING EV CHARGING INFRASTRUCTURE AT ITS FACILITIES?**

A. Yes, Walmart seeks to balance the risks and costs of installing and maintaining a particular EV charging station, which is informed, in part, by the tariff under which the electricity is provided from the utility to the owner of the EV charger.

**Q. SHOULD THE BUREAU REQUIRE THE COMPANY TO DEVELOP AN EV CHARGING-SPECIFIC RATE FOR PUBLIC EV CHARGERS?**

A. Yes, it should. In the short term, public EV charging-specific rates are needed to support third-party investment in EV charging equipment. As an investor in EV charging equipment for both the public and for its own private fleet, Walmart understands how EV charging rates can either promote or impede EV charging investment and experience. While the EV industry continues to grow, there will still be a ramp up to sufficient EV adoption to support an extensive public EV charging network. This will create geographical locations where public EV chargers are either not being used

or are used infrequently. For these under-utilized chargers that are being billed by the utility under a more traditional rate tariff with a demand charge, the charger operator may be assessed the maximum demand charge even after only a single use of that charging unit regardless of whether there is any additional charging during that month. This outcome negatively impacts the economics for that unit and may lead to little or no third-party investment in public EV chargers sited in areas of low usage.

**Q. WHAT IS WMTPR'S RECOMMENDATION TO THE BUREAU WITH REGARD TO DEVELOPING AN EV RATE SPECIFICALLY FOR PUBLIC EV CHARGERS?**

A. WMTPR recommends that the Bureau require the Company to work with interested stakeholders to develop a new EV rate specifically for public-facing DCFC EV chargers as part of its EV Implementation Support plan for FY 2026-2028.

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

A. Yes.

# **EXHIBIT 1.01**

# Steve W. Chriss

Walmart Inc.

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

---

## EXPERIENCE

July 2007 – Present

**Walmart Inc.**, Bentonville, AR

**Senior Director, Utility Partnerships** (July 2023 – Present)

**Director, Energy Services** (October 2018 – July 2023)

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

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

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

June 2003 – July 2007

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

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

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

January 2003 - May 2003

**North Harris College**, Houston, TX

**Adjunct Instructor, Microeconomics**

June 2001 - March 2003

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

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

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

## EDUCATION

2001                      **Louisiana State University**

M.S., Agricultural Economics

1997-1998              **University of Florida**

Graduate Coursework, Agricultural Education  
and Communication

1997                      **Texas A&M University**

B.S., Agricultural Development

B.S., Horticulture

## PRESENT MEMBERSHIPS

Arkansas Advanced Energy Foundation, Board

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

The Ray, Advisory Council

## PAST MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Clean Energy Buyers Alliance, Advisory Board

Florida Advisory Council for Climate and Energy

South Carolina Electricity Market Reforms Measures Study Committee

Southwest Power Pool, Corporate Governance Committee

**TESTIMONY BEFORE REGULATORY COMMISSIONS**

2025

Florida Docket No. 20250011-EI: In re: Petition for rate increase by Florida Power & Light Company.

Louisiana Docket No. U-37425: Application of Entergy Louisiana, LLC for Approval of Generation and Transmission Resources Proposed in Connection with Service to a Significant Customer Project in North Louisiana, Including Proposed Rider, and Request for Timely Treatment.

2024

North Dakota Case No. PU-23-324: 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-2024-00024: Application of Appalachian Power Company for a 2024 Biennial Review of its Base Rates, Terms and Conditions Pursuant to §56-585.8 of the Code of Virginia (adopted testimony of Lisa Perry).

Louisiana Docket No. S-37074: Application of Southwestern Electric Power Company for Approval of Revised Renewable Energy Credit (REC) Tariff Submitted in Accordance with Order U-35736.

Arkansas Docket No. 24-032-TF: In the Matter of the Application of Southwestern Electric Power Company for a Proposed Revision to Rate Schedule No. 51, Renewable Energy Credit (REC) Rider.

Nevada Docket No. 24-02026: In the Matter of the Application of Sierra Pacific Power Company D/B/A NV Energy, Filed Pursuant to NRS 704.110(3) and NRS 704.110(4), Addressing General Rates Charged to All Classes of Electric Customers.

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

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

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

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

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

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

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

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

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

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

2023

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

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

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

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

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

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

New Mexico Case No. 22-00270-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 595.

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

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

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

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

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

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

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

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

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

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

2022

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

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

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

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

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

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

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

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

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

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

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

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

*2021*

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

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

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

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

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

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

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

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

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

*2020*

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

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

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

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

Nevada Docket No. 20-05004: Application of Sierra Pacific Power Company d/b/a NV Energy Filed Under Advice Letter No. 629-E to Establish Customer Price Stability Tariff Schedule No. CPST (the "Program") to Assist Certain Qualifying Customers During the COVID-19 Pandemic and Economic Downturn, and to



Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

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

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

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

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

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

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

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

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

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

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

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

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

#### *2019*

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

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

Indiana Cause No. 45253: Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code §§ 8-1-2-42.7 and 8-1-2-61, For (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Step-In of New Rates and Charges Using a Forecasted Test Period; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of a Federal Mandate Certificate Under

Ind. Code § 8-1-8.4-1; (4) Approval of Revised Electric Depreciation Rates Applicable to its Electric Plant in Service; (5) Approval of Necessary and Appropriate Accounting Deferral Relief; and (6) Approval of a Revenue Decoupling Mechanism for Certain Customer Classes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *2018*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2017

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2016*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *2015*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2014*

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for



Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### *2013*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2012*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2011*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2010*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

#### *2008*

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

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

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

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

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



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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

## TESTIMONY BEFORE LEGISLATIVE BODIES

2024

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

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

2023

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

2020

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

2019

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

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

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

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

*2018*

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

*2017*

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

*2016*

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

*2014*

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

*2012*

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

*2011*

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

## **AFFIDAVITS**

*2015*

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

*2011*

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

## **ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

Moderator, Building Infrastructure for a Growing Grid: Challenges and Opportunities, Edison Electric Institute National Key Accounts Workshop, Chicago, Illinois, March 24, 2025.

Panelist, Navigating the (Load) Curves of Transportation Electrification, NRECA PowerXchange, Atlanta, Georgia, March 11, 2025.

Panelist, Does My Power Purchase Agreement Need Sleeves?, NARUC Winter Policy Summit, Washington, D.C., February 23, 2025.

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

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

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

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

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

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

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

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

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

Speaker, Walmart and the Co-ops: The Value of Partnership, Texas Electric Cooperatives 22<sup>nd</sup> 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?, 36<sup>th</sup> National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 29<sup>th</sup> 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 19<sup>th</sup> 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.

# **EXHIBIT 1.02**



Exhibit Walmart 1.02  
DERIVATION OF PERCENTAGE REVENUE RECOVERY BY FUNCTION, GENERAL SERVICE AT TRANSMISSION VOLTAGE

Charge	Billing Determinants	Present Rate	Present Revenue	% of Revenue Recovery	Proposed Rate	Proposed Revenue	% of Revenue Recovery
(1)	(2)	(3)	(4) (2) X (3)	(5) (4) / Total	(6)	(7) (2) X (6)	(8) (7) / Total
<b>2026</b>							
Customer Charge	7,416	##### /month	\$ 3,337,200	2%	##### /month	\$ 14,832,000	5%
Distribution Service							
Contracted Demand	7,054,980	\$ 7.70 /kVA	\$ 54,323,346	35%	\$ 12.00 /kVA	\$ 84,659,760	30%
Excess Demand	347,823	\$ 9.60 /kVA	\$ 3,339,101	2%	\$ 15.00 /kVA	\$ 5,217,345	2%
Electricity Service							
Energy - first 300 kWh/kW	2,200,168,800	##### /kWh	\$ 80,306,161	51%	\$ 0.0705 /kWh	\$ 155,111,900	55%
Energy - all additional	486,491,203	##### /kWh	\$ 15,810,964	10%	\$ 0.0450 /kWh	\$ 21,892,104	8%
<b>Total</b>			<b>\$ 157,116,772</b>	<b>100%</b>		<b>\$ 281,713,110</b>	<b>100%</b>
<b>Total Recovery %</b>							
Customer				2%			5%
Demand				37%			32%
Energy				61%			63%
<b>2027</b>							
Customer Charge	7,404				##### /month	\$ 18,510,000	7%
Distribution Service							
Contracted Demand	7,054,980				\$ 11.50 /kVA	\$ 81,132,270	29%
Excess Demand	347,823				\$ 15.00 /kVA	\$ 5,217,345	2%
Electricity Service							
Energy - first 300 kWh/kW	2,115,984,800				\$ 0.0740 /kWh	\$ 156,582,875	55%
Energy - all additional	508,508,798				\$ 0.0455 /kWh	\$ 23,137,150	8%
<b>Total</b>						<b>\$ 284,579,641</b>	<b>100%</b>
<b>Total Recovery %</b>							
Customer							7%
Demand							30%
Energy							63%
<b>2028</b>							
Customer Charge	7,404				##### /month	\$ 37,020,000	14%
Distribution Service							
Contracted Demand	7,054,980				\$ 11.25 /kVA	\$ 79,368,525	29%
Excess Demand	-				\$ 15.00 /kVA	\$ -	0%
Electricity Service							
Energy - first 300 kWh/kW	2,115,993,600				\$ 0.0642 /kWh	\$ 135,846,789	50%
Energy - all additional	491,217,913				\$ 0.0375 /kWh	\$ 18,420,672	7%
<b>Total</b>						<b>\$ 270,655,986</b>	<b>100%</b>
<b>Total Recovery %</b>							
Customer							14%
Demand							29%
Energy							57%

Sources:  
FY2026 Schedule M-1  
FY2027 Schedule M-1  
FY2028 Schedule M-1