

**BEFORE**

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

**Case No. 14-1297-EL-SSO**

## DIRECT TESTIMONY AND EXHIBITS OF STEVE W. CHRISS

**ON BEHALF OF**

**WAL-MART STORES, INC. AND SAM'S EAST, INC.**

Dated: December 22, 2014

1    **Introduction**

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

3        A.     My name is Steve W. Chriss. My business address is 2001 SE 10th St.,  
4               Bentonville, AR 72716-0550. I am employed by Wal-Mart Stores, Inc. as Senior  
5               Manager, Energy Regulatory Analysis.

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

7        A.     I am testifying on behalf of Wal-Mart Stores East, LP and Sam's East, Inc.  
8               ("Walmart").

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

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

21

1       **Q.     HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE PUBLIC UTILITIES**  
2       **COMMISSION OF OHIO ("THE COMMISSION")?**

3       A.     Yes. I testified in Case Nos. 10-2586-EL-SSO, 11-346-EL-SSO, 12-426-EL-SSO, 13-  
4       2385-EL-SSO, and 14-841-EL-SSO.

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

8       A.     Yes. I have submitted testimony in over 110 proceedings before 34 other utility  
9       regulatory commissions and before the Missouri House Committee on Utilities, the  
10       Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs  
11       Committee, and the Kansas House Standing Committee on Utilities and  
12       Telecommunications. My testimony has addressed topics including, but not limited  
13       to, cost of service and rate design, ratemaking policy, qualifying facility rates,  
14       telecommunications deregulation, resource certification, energy efficiency/demand  
15       side management, fuel cost adjustment mechanisms, decoupling, and the collection  
16       of cash earnings on construction work in progress.

17  
18       **Q.     ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

19       A.     Yes. I am sponsoring Exhibit SWC-1, consisting of twelve pages, and Exhibit SWC-2,  
20       consisting of three pages.

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

2       A.     The purpose of my testimony is to address issues related to the standard service  
3             offer ("SSO") through an electric security plan ("ESP") proposed in the Application of  
4             Ohio Edison Company ("OE"), The Cleveland Electric Illuminating Company ("CEI"),  
5             and The Toledo Edison Company ("TE") (collectively "the Companies").  
6

7       **Q.     PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN OHIO.**

8       A.     Walmart operates 175 retail units and employs 46,974 associates in Ohio. In fiscal  
9             year ending 2014, Walmart purchased \$13.4 billion worth of goods and services  
10            from Ohio-based suppliers, supporting 94,519 supplier jobs.<sup>1</sup>  
11

12       **Q.     PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE COMPANIES'**  
13             **SERVICE TERRITORIES.**

14       A.     Walmart has approximately 38 stores and related facilities that take electric  
15             distribution service from OE, approximately 23 stores and related facilities that take  
16             electric distribution service from CEI, and approximately 8 stores and related  
17             facilities that take electric distribution service from TE, primarily on each company's  
18             General Service - Secondary ("GS") rate schedules.

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<sup>1</sup> <http://corporate.walmart.com/our-story/locations/united-states#/united-states/ohio>

**Summary of Recommendations**

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

A. My recommendations to the Commission are as follows:

1) The Commission should consider ways to simplify the rate structure, including requiring the Companies to file a base rate case at the conclusion of the proposed ESP term. This would allow the Commission to examine the inclusion of multiple costs currently recovered by numerous riders into the Companies' base rates.

2) The Commission should reject the proposed Economic Stability Program and Retail Rate Stability Rider ("RRS").

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

A. Absolutely not. The fact that an issue is not addressed herein or in related filings should not be construed as an endorsement of any filed position.

**Q. WHAT IS YOUR GENERAL UNDERSTANDING OF THE COMPANIES' ESP PROPOSAL?**

A. My general understanding of the Companies' ESP proposal is that from June 1, 2016, through May 31, 2019, for customers who do not take supply from competitive suppliers, the Companies' SSO, or the generation portion of rates, will be based on the proposals in the Companies' filing pursuant to §§ 4928.141 and 4928.143 of the

Ohio Revised Code. While I am not an attorney, my understanding is that § 4928.143 provides for a broad array of utility costs to be considered as part of an ESP proposal.

**Q. DOES THE COMPANIES' PROPOSED ESP COVER A BROAD ARRAY OF UTILITY COSTS?**

**A.** Yes. An examination of the Companies' ESP filing demonstrates the breadth of the array. For example, the Companies propose changes to the following existing riders:

- Alternative Energy Resource (AER);
- Generation Cost Reconciliation (GCR);
- Advanced Metering Infrastructure / Modern Grid (AMI);
- Non-Distribution Uncollectable (NDU);
- Generation Service (GEN);
- Demand Side Management / Energy Efficiency (DSE);
- Economic Development (EDR section (d));
- Non-Market Based Service (NMB); and
- Residential Generation Credit (RGC).

The Companies propose the following new riders:

- Government Directives Recovery Rider (GDR); and
- Retail Rate Stability Rider (RRS).

1 The Companies also propose to eliminate six rate schedules, riders, or sections of  
2 rate schedules or riders, and propose no change to over 30 existing rate schedules or  
3 riders. See Application, Attachment 2.  
4

5 **Q. DO YOU HAVE A GENERAL COMMENT ABOUT THE COMPANIES' ESP PROPOSAL?**

6 A. Yes. The ESP proposal continues what is already an extraordinarily complex set of  
7 rates. For instance, a commercial GS customer that takes service from OE, per the  
8 Companies' proposal, would be required to examine approximately 30 rate  
9 schedules or riders for applicability to their electric service. See Application,  
10 Attachment 3, Sheet 80. The Commission should consider ways to simplify the rate  
11 structure, including requiring the Companies to file a base rate case at the  
12 conclusion of the proposed ESP term. This would allow the Commission to examine  
13 the inclusion of multiple costs currently recovered by numerous riders into the  
14 Companies' base rates.  
15

16 **Economic Stability Program and Rider RRS**

17 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANIES' PROPOSED ECONOMIC**  
18 **STABILITY PROGRAM?**

19 A. My understanding is that the Companies propose the Economic Stability Program as  
20 a means to provide financial assistance to their unregulated affiliate FirstEnergy  
21 Solutions Corp. ("FES") through a Federal Energy Regulatory Commission ("FERC")-

1 jurisdictional power purchase agreement for the output of the Davis-Besse Nuclear  
2 Power Station ("Davis-Besse"), the W.H. Sammis Plant ("Sammis"), and the FES share  
3 of the output of the Ohio Valley Electric Corporation ("OVEC"). See Direct Testimony  
4 of Jay A. Ruberto, page 3, line 3 to line 8. The Companies propose that the purchase  
5 power agreement be for delivery between June 1, 2016, and May 31, 2031, or 15  
6 years. Id., page 3, line 15 to line 16.

7  
8 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANIES' PROPOSED RIDER RRS?**

9 A. My understanding is that the Companies propose Rider RRS as a non-bypassable  
10 mechanism to charge or credit all OE, TE, and CEI distribution customers for the  
11 Companies' proposed Economic Stability Program. See Direct Testimony of Joanne  
12 M. Savage, page 2, line 20 to line 21.

13  
14 **Q. HOW DO THE COMPANIES PROPOSE TO CALCULATE THE REVENUE REQUIREMENT**  
15 **OF RIDER RRS?**

16 A. The Companies propose to calculate the revenue requirement as the difference  
17 between the projected costs for the plants, including a return on and of invested  
18 capital, associated expenses and taxes for the upcoming year and the projected PJM  
19 market revenues that the Companies would receive for selling the energy, capacity,  
20 and ancillary services from the plants. The Companies also propose to include an



annual reconciliation from the prior period in the RRS revenue requirement. Id.,  
page 3, line 7 to line 15.

**Q. WHAT ROE DID THE COMPANIES AGREE TO WITH FES FOR THE PURCHASED  
POWER AGREEMENTS?**

A. The Companies agreed to an ROE of 11.15 percent with FES. See Direct Testimony of  
Steve Staub, page 2, line 14.

**Q. WHAT REVENUE ALLOCATION AND RATE DESIGN DO THE COMPANIES PROPOSE  
FOR RIDER RRS?**

A. The Companies propose to allocate revenue on a demand basis, using the average of  
the four monthly coincident peaks, including distribution losses, for the months of  
June through September of the prior year. The allocated revenue is then proposed  
to be charged on an energy basis, using projected kWh sales for the revenue  
requirement recovery period. See Direct Testimony of Joanne M. Savage, page 4,  
line 13 to line 20.

**Q. WHY DO THE COMPANIES PROPOSE THE ECONOMIC STABILITY PROGRAM AND  
RIDER RRS?**

A. The Companies state that the proposed Economic Stability Program and Rider RRS  
would provide "a mitigation mechanism for price increases and volatility that retail

1 consumers are expected to experience over the next fifteen years." See Direct  
2 Testimony of Steven A. Strah, page 4, line 18 to line 19.

3  
4 **Q. DOES THE COMPANIES' FILING PROVIDE ILLUSTRATIVE RRS RATES?**

5 A. Yes. The Companies' analysis shows projected annual revenue requirements of  
6 \$167.2 million, \$194.9 million, and \$103.2 million for the three-year period of the  
7 proposed ESP. It is not until after the period of the proposed ESP that the  
8 Companies project benefits to accrue to customers. Customers are projected to pay  
9 approximately \$465 million before they have the chance to see those projected  
10 benefits. See Direct Testimony of Joanne M. Savage, Attachment JMS-2.

11  
12 **Q. DO YOU HAVE CONCERNS WITH THE PROPOSED ECONOMIC STABILITY PROGRAM**  
13 **AND RIDER RRS?**

14 A. Yes, I have several concerns. First, it is simply not appropriate to require captive  
15 customers of the regulated retail utility to financially assist an unregulated affiliate  
16 that operates in the competitive wholesale market. This concern is exacerbated by  
17 the nature of the proposal itself, as the Companies propose to treat customers as if  
18 they took service in a traditional vertically integrated utility paradigm, with  
19 customers essentially bearing the financial, regulatory, and operational risks of the  
20 Davis-Besse, Sammis, and OVEC plants. Yet, unlike a traditional vertically integrated  
21 utility paradigm, it is not clear that the regulatory protection sought by the

1 Companies would come with the same requisite regulatory oversight. Further, the  
2 Companies' proposed ROE of 11.15 percent for the purchased power agreements is  
3 far higher than regulated ROEs recently awarded by commissions nationwide. The  
4 Commission should not approve a proposal that would provide regulatory  
5 protection for generation plant assets at a cost that exceeds what ratepayers would  
6 pay for the plant were it owned by a vertically integrated utility and with less  
7 Commission oversight of those assets.

8  
9 **Q. PLEASE EXPLAIN YOUR CONCERN REGARDING REGULATORY OVERSIGHT.**

10 A. While the Companies propose a Staff audit process including a review "for  
11 mathematical errors" and the reasonableness of the actual costs proposed to be  
12 included in Rider RRS, it is not clear whether this process would be open to all  
13 intervenors, whether the scope of any related Commission determinations as to  
14 prudence and cost recovery would be limited, or if the Commission would have the  
15 authority to direct or review the planning and costs incurred by FES in its  
16 management of the plants. See Direct Testimony of Eileen M. Mikkelsen, page 14,  
17 line 21 to page 15, line 22. This authority is important given the potential for  
18 expenditures necessary to comply with federal regulations, particularly for the  
19 Sammis and OVEC coal plants, as customers would be exposed to recovery of  
20 potentially significant costs over which the Commission would appear to have little  
21 oversight.

1       **Q.     IS THE COMPANIES' PROPOSED ROE FOR THE PURCHASED POWER AGREEMENTS**  
2       **HIGHER THAN THOSE APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS?**

3       A.     Yes. The proposed ROE of 11.15 percent is higher than the ROEs approved by other  
4       utility regulatory commissions in 2012, 2013, and so far in 2014. The proposed ROE  
5       is also significantly higher than the Companies' last approved distribution ROE of  
6       10.5 percent, and that ROE is in itself also significantly higher than the average of  
7       more recently authorized ROEs nationally. See Direct Testimony of Steve Staub,  
8       page 5, line 13.

9  
10      **Q.     WHAT IS YOUR UNDERSTANDING OF THE RETURNS ON EQUITY APPROVED FOR**  
11      **ELECTRIC UTILITIES BY COMMISSIONS NATIONWIDE IN 2012, 2013, AND SO FAR IN**  
12      **2014?**

13      A.     According to data from SNL Financial<sup>2</sup>, a financial news and reporting company, the  
14      average of the 119 reported electric utility rate case ROEs authorized by  
15      commissions to investor-owned electric utilities in 2012, 2013, and so far in 2014, is  
16      9.89 percent. The range of reported authorized ROEs for the period is 8.72 percent  
17      to 10.95 percent, and the median authorized ROE is 9.84 percent. The Companies'  
18      proposed ROE exceeds the average authorized ROE for the period by 126 basis  
19      points. See Exhibit SWC-2, page 3.

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<sup>2</sup> Regulatory Research Associates is part of SNL Financial.

1       **Q.     IS THE AVERAGE REPORTED ROE EVEN LOWER FOR DISTRIBUTION ONLY UTILITIES**  
2       **OR IN CASES WHERE ONLY DISTRIBUTION RATES WERE AT ISSUE?**

3       A.     Yes. The average reported ROE for distribution only utilities or for rate cases that  
4       only dealt with distribution rates was 9.56 percent. Id. This is almost 100 basis  
5       points lower than the Companies' last approved distribution ROE of 10.5 percent.  
6

7       **Q.     IS THERE AN OVERALL DECLINING TREND IN AUTHORIZED ROES FOR DISTRIBUTION**  
8       **ONLY UTILITIES FROM 2012 TO PRESENT?**

9       A.     Yes. The average authorized ROE for distribution only utilities in 2012 was 9.75  
10      percent, in 2013 was 9.37 percent, and so far in 2014 is 9.51 percent. It should be  
11      noted that the 2012 and 2013 values include authorized ROEs for Commonwealth  
12      Edison and Ameren Illinois that are set by a statutory formula, so excluding those  
13      values results in an average authorized ROE in 2012 of 9.8 percent and in 2013 of  
14      9.56 percent. Id.  
15

16      **Q.     WHAT IS THE AVERAGE AUTHORIZED ROE IN THE REPORTED GROUP FOR THE**  
17      **VERTICALLY INTEGRATED UTILITIES?**

18      A.     In the group reported by SNL Financial, the average authorized ROE for vertically  
19      integrated utilities from 2012 to present is 10.02 percent. Id. However, there is a  
20      declining trend for vertically integrated utilities from 2012 to present.

1       **Q.     PLEASE EXPLAIN.**

2       A.     The average authorized ROE for vertically integrated utilities in 2012 it was 10.1  
3             percent, in 2013 it was 9.97 percent, and so far in 2014 it is 9.91 percent.

4  
5       **Q.     IN LIGHT OF THIS, DO YOU BELIEVE THE COMPANIES' PROPOSED ROE OF 11.15**  
6             **PERCENT AS APPLIED TO THE PURCHASED POWER AGREEMENTS WITH FES IS**  
7             **REASONABLE?**

8       A.     No. It is not reasonable.

9  
10      **Q.     DO YOU HAVE AN ADDITIONAL POLICY CONCERN REGARDING THE PROPOSED**  
11            **ECONOMIC STABILITY PROGRAM AND RIDER RRS?**

12      A.     Yes. The proposed program and Rider RRS is essentially a mechanism that  
13             inappropriately transfers the risk exposure of FES's plant ownership and ownership  
14             share of OVEC to customers. Regardless of prices in the energy or capacity market  
15             or the performance, efficiency, or the economics of the FES and OVEC generation  
16             assets relative to the broader base of generation in the market, the Rider RRS will  
17             provide FES with revenue assurance for some, if not all, of its cost exposure for its  
18             Davis-Besse and Sammis ownership and operational costs and FES's share of OVEC.  
19             The FES and OVEC generation assets, which operate in the wholesale market, will be  
20             given cost recovery assurance not afforded to all other generators in the market.

1 This concern grows with the potential for environmental regulations increasing the  
2 costs related to the Sammis and OVEC generation assets, which are coal-fired units.  
3

4 **Q. WHAT OTHER CONCERNS DO YOU HAVE WITH THE PROPOSED ECONOMIC**  
5 **STABILITY PROGRAM AND RIDER RRS?**

6 A. While the plants' output is not being offered specifically as generation service to  
7 customers, the Companies are proposing to charge or credit customers for the costs  
8 of a generation-related service, which is the use of the generation assets as a hedge  
9 against generation market price volatility. As such, it is not appropriate to assess the  
10 Rider RRS charge or credit to competitive supplied customers, since the price paid to  
11 the supplier by such customers already includes the cost of power and the cost of  
12 procurement for that power, compliance costs, and other underlying operating  
13 costs, such as risk management and hedge costs.  
14

15 **Q. DO YOU HAVE A CONCERN THAT SENATE BILL 221 APPEARS TO IMPLICATE THE**  
16 **PROPOSED RIDER RRS?**

17 A. Yes. While I am not an attorney, Section 4928.02(H) states:

18 Ensure effective competition in the provision of retail electric service by  
19 avoiding anticompetitive subsidies flowing from a noncompetitive retail  
20 electric service to a competitive retail electric service or to a product or  
21 service other than retail electric service, and vice versa, including by  
22 prohibiting the recovery of any generation-related costs through  
23 distribution or transmission rates.

1 The provision of market price mitigation through the use of the FES and OVEC  
2 generation assets as proposed by the Companies is a generation-related service and,  
3 on its face, would appear to be prohibited by the statute.<sup>3</sup>  
4

5 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION?**

6 A. The Commission should reject the proposed Economic Stability Program and Rider  
7 RRS.  
8

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

10 A. Yes.

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<sup>3</sup> Walmart reserves the right to brief legal issues at the appropriate time in this proceeding.



**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**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 )**

**Case No. 14-1297-EL-SSO**

**EXHIBITS OF STEVE W. CHRISS**

**ON BEHALF OF**

**WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

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<b>Edison Company for Authority to Provide</b>	)	<b>Case No. 14-1297-EL-SSO</b>
<b>For a Standard Service Offer Pursuant to R.C.</b>	)	
<b>4928.143 in the Form of an Electric Security</b>	)	
<b>Plan</b>	)	

**EXHIBIT SWC-1 OF STEVE W. CHRISS**

**ON BEHALF OF**

**WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

## Steve W. Chriss

Senior Manager, Energy Regulatory Analysis

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### EXPERIENCE

July 2007 – Present

Wal-Mart Stores, Inc., Bentonville, AR

Senior Manager, Energy Regulatory Analysis (June 2011 – Present)

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

### TESTIMONY BEFORE REGULATORY COMMISSIONS

2014

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.

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

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

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

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

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

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

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

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

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

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

#### 2013

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2011*

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

*2010*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

*2008*

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

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval

of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

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

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

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

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

*2007*

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

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

*2006*

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

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

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

*2005*

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

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

*2004*

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

**TESTIMONY BEFORE LEGISLATIVE BODIES**

**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**

**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**

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.

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**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 )**

**Case No. 14-1297-EL-SSO**

**EXHIBIT SWC-2 OF STEVE W. CHRISS**

**ON BEHALF OF**

**WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2012 to Present

State	Docket	Utility	Distribution		Decision Date
			Only	Authorized ROE	
SC	2011-271-E	Duke Energy Carolinas LLC		10.50%	1/25/2012
NC	E-7, Sub 989	Duke Energy Carolinas LLC		10.50%	1/27/2012
MI	16801	Indiana-Michigan Power Co.		10.20%	2/15/2012
OR	UE 233	Idaho Power Co.		9.90%	2/23/2012
FL	110138	Gulf Power Co.		10.25%	2/27/2012
ND	PU-10-657	Northern States Power Co.		10.40%	2/29/2012
MN	10-971	Northern States Power Co.		10.37%	3/29/2012
HI	2009-0164	Hawaii Electric Light Co.		10.00%	4/4/2012
CO	11AL-947E	Public Service Company of Colorado		10.00%	4/26/2012
HI	2009-0163	Maui Electric Company Ltd		10.00%	5/2/2012
WA	UE-111048	Puget Sound Energy Inc.		9.80%	5/7/2012
AZ	E-01345A-11-0224	Arizona Public Service Co.		10.00%	5/15/2012
IL	11-0721	Commonwealth Edison Co.	Yes	10.05%	5/29/2012
MI	16794	Consumers Energy Co.		10.30%	6/7/2012
NY	11-E-0408	Orange & Rockland Utilities Inc.	Yes	9.40%	6/14/2012
WI	6680-UR-118	Wisconsin Power and Light Co.		10.40%	6/15/2012
WY	20003-114-ER-11	Cheyenne Light Fuel Power Co.		9.60%	6/18/2012
SD	EL11-019	Northern States Power Co.		9.25%	6/19/2012
MI	16830	Wisconsin Electric Power Co.		10.10%	6/26/2012
HI	2009-0080	Hawaiian Electric Co.		10.00%	6/29/2012
OK	PUD 201100087	Oklahoma Gas and Electric Co.		10.20%	7/9/2012
WY	20000-405-ER-11	Rocky Mountain Power		9.80%	7/16/2012
MD	9285	Delmarva Power & Light Co.	Yes	9.81%	7/20/2012
MD	9286	Potomac Edison Power Co.	Yes	9.31%	7/20/2012
TX	39896	Entergy Texas Inc.		9.80%	9/13/2012
IL	12-0001	Ameren Illinois	Yes	10.05%	9/19/2012
UT	11-035-200	Rocky Mountain Power		9.80%	9/19/2012
DC	1087	Potomac Edison Power Co.	Yes	9.50%	9/26/2012
NJ	ER-11080469	Atlantic City Electric Co.	Yes	9.75%	10/23/2012
WI	6690-UR-121	Wisconsin Public Service Corp.		10.30%	10/24/2012
WI	3270-UR-118	Madison Gas and Electric Co.		10.30%	11/9/2012
WI	05-UR-106	Wisconsin Electric Power Co.		10.40%	11/28/2012
CA	A12-02-014	California Pacific Electric Co.		9.88%	11/29/2012
DE	D-11-528	Delmarva Power & Light Co.	Yes	9.75%	11/29/2012
IL	12-0293	Ameren Illinois	Yes	9.71%	12/5/2012
PA	E-2012-2290597	PPL Electric Utilities Corp	Yes	10.40%	12/5/2012
MO	ER-2012-0166	Union Electric Co.		9.80%	12/12/2012
FL	120015	Florida Power & Light		10.50%	12/13/2012
KS	12-KCPE-764-RTS	Kansas City Power & Light		9.50%	12/13/2012
WI	4220-UR-118	Northern States Power Co.		10.40%	12/14/2012
IL	12-0321	Commonwealth Edison Co.	Yes	9.71%	12/19/2012
SC	2012-218-E	South Carolina Electric & Gas		10.25%	12/19/2012
CA	A12-04-018	Pacific Gas & Electric		10.40%	12/20/2012
CA	A12-04-016	San Diego Gas & Electric		10.30%	12/20/2012
CA	A12-04-015	Southern California Edison		10.45%	12/20/2012
KY	2012-00221	Kentucky Utilities		10.25%	12/20/2012
KY	2012-00222	Louisville Gas & Electric		10.25%	12/20/2012
OR	UE 246	PacifiCorp		9.80%	12/20/2012
RI	4323	Narragansett Electric Co.	Yes	9.50%	12/20/2012
NC	E-22, Sub 479	Virginia Electric & Power Co.		10.20%	12/21/2012
WA	UE-120436	Avista Corp.		9.80%	12/26/2012
MO	ER-2012-0174	Kansas City Power & Light		9.70%	1/9/2013
MO	ER-2012-0175	KCP&L Greater Missouri Op Co.		9.70%	1/9/2013
IN	44075	Indiana-Michigan Power Co.		10.20%	2/13/2013
MD	9299	Baltimore Gas and Electric Co.	Yes	9.75%	2/22/2013
LA	U-32220	Southwestern Electric Power Co.		10.00%	2/27/2013
NY	12-E-0201	Niagara Mohawk Power Corp.	Yes	9.30%	3/14/2013



## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2012 to Present

State	Docket	Utility	Distribution		Decision Date
			Only	Authorized ROE	
ID	AVU-E-12-08	Avista Corp.		9.80%	3/27/2013
OH	12-1682-EL-AIR	Duke Energy Ohio Inc.	Yes	9.84%	5/1/2013
MI	U-17087	Consumers Energy Co.		10.30%	5/15/2013
NC	E-2, Sub 1023	Duke Energy Progress Inc.		10.20%	5/30/2013
HI	2011-0092	Maui Electric Company Ltd		9.00%	5/31/2013
AZ	E-01933A-12-0291	Tucson Electric Power Co.		10.00%	6/11/2013
NJ	ER-12121071	Atlantic City Electric Co.	Yes	9.75%	6/21/2013
WA	UE-130137	Puget Sound Energy Inc.		9.80%	6/25/2013
MD	9311	Potomac Edison Power Co.	Yes	9.36%	7/12/2013
MN	E-002/GR-12-961	Northern States Power Co.		9.83%	8/8/2013
CT	13-01-19	United Illuminating	Yes	9.15%	8/14/2013
SC	2013-59-E	Duke Energy Carolinas LLC		10.20%	9/11/2013
FL	130040-EI	Tampa Electric Co.		10.25%	9/11/2013
NC	E-7, Sub 1026	Duke Energy Carolinas LLC		10.20%	9/24/2013
TX	40443	Southwestern Electric Power Co.		9.65%	10/3/2013
WI	6690-UR-122	Wisconsin Public Service Corp.		10.20%	11/6/2013
KS	13-WSEE-629-RTS	Westar Energy Inc.		10.00%	11/21/2013
VA	PUE-2013-00020	Virginia Electric & Power Co.		10.00%	11/26/2013
FL	130140-EI	Gulf Power Co.		10.25%	12/3/2013
WA	UE-130043	PacifiCorp		9.50%	12/4/2013
WI	4220-UR-119	Northern States Power Co.		10.20%	12/5/2013
IL	13-0301	Ameren Illinois	Yes	8.72%	12/9/2013
OR	UE 262	Portland General Electric Co.		9.75%	12/9/2013
MD	9326	Baltimore Gas and Electric Co.	Yes	9.75%	12/13/2013
LA	U-32707	Entergy Gulf States Louisiana LLC		9.95%	12/16/2013
LA	U-32708	Entergy Louisiana LLC		9.95%	12/16/2013
NV	13-06002	Sierra Pacific Power Co.		10.12%	12/16/2013
AZ	E-04204A-12-0504	UNS Electric Inc.		9.50%	12/17/2013
GA	36989	Georgia Power Co.		10.95%	12/17/2013
IL	13-0318	Commonwealth Edison Co.	Yes	8.72%	12/18/2013
OR	UE 263	PacifiCorp		9.80%	12/18/2013
MI	U-17274	Upper Peninsula Power Co.		10.15%	12/19/2013
NY	13-E-0030	Consolidated Edison Co. of NY	Yes	9.20%	2/20/2014
ND	PU-12-813	Northern States Power Co.		9.75%	2/26/2014
NH	DE-13-063	Liberty Utilities Granite State	Yes	9.55%	3/17/2014
NM	12-00350-UT	Southwestern Public Service		9.96%	3/26/2014
DC	1103-2013-E	Potomac Edison Power Co.	Yes	9.40%	3/26/2014
DE	13-115	Delmarva Power & Light Co.	Yes	9.70%	4/2/2014
TX	41791	Entergy Texas Inc.		9.80%	5/16/2014
MA	13-90	Fitchburg Gas & Electric Light	Yes	9.70%	5/30/2014
WI	6680-UR-119	Wisconsin Power and Light Co.		10.40%	6/6/2014
ME	2013-00443	Emera Maine	Yes	9.55%	6/30/2014
MD	9336	Potomac Electric Power Co.	Yes	9.62%	7/2/2014
CNO	UD-13-01	Entergy Louisiana LLC (New Orleans)		9.95%	7/10/2014
NJ	ER-13111135	Rockland Electric Company	Yes	9.75%	7/23/2014
ME	2013-00168	Central Maine Power Co.	Yes	9.45%	7/29/2014
WY	20003-132-ER-13	Cheyenne Light Fuel Power Co.		9.90%	7/31/2014
AR	13-028-U <sup>1</sup>	Entergy Arkansas Inc.		9.50%	8/15/2014

NJ	ER-14030245	Atlantic City Electric Co.	Yes	9.75%	8/20/2014
VT	8190	Green Mountain Power Corp.		9.60%	8/25/2014
UT	13-035-184	PacifiCorp		9.80%	8/29/2014
FL	140025-EI	Florida Public Utilities Co.		10.25%	9/15/2014
NV	14-05004	NV Energy South		9.80%	10/9/2014
IL	14-0066	MidAmercian Energy Co.		9.56%	11/6/2014
WI	6690-UR-123	Wisconsin Public Service Corp.		10.20%	11/6/2014
WI	05-UR-107	Wisconsin Electric Power Co.		10.20%	11/14/2014
WI	3270-UR-120	Madison Gas and Electric Co.		10.20%	11/26/2014
VA	PUE-2014-00026	Appachian Power Co.		9.70%	11/26/2014
OR	UE 283	Portland General Electric		9.68%	12/4/2014
IL	14-0317	Ameren Illinois	Yes	9.25%	12/10/2014
IL	14-0312	Commonwealth Edison Co.	Yes	9.25%	12/10/2014
WI	4220-UR-120	Northern States Power Co.		10.20%	12/12/2014

<sup>1</sup> The Arkansas Public Service Commission originally approved a 9.3% ROE, but increased it to 9.5% on rehearing. See Order No. 35, Arkansas Docket 13-028-U.

#### Entire Period

# of Decisions	119
Average (All Utilities)	9.89%
Average (Distribution Only)	9.56%
Average (Vertically Integrated Only)	10.02%
Median	9.84%
Minimum	8.72%
Maximum	10.95%

#### 2012

# of Decisions	51
Average (All Utilities)	10.02%
Average (Distribution Only)	9.75%
Average (Distribution Only, exc. IL FRP)	9.75%
Average (Vertically Integrated Only)	10.10%

#### 2013

# of Decisions	38
Average (All Utilities)	9.83%
Average (Distribution Only)	9.37%
Average (Distribution Only, exc. IL FRP)	9.56%
Average (Vertically Integrated Only)	9.97%

#### 2014

# of Decisions	30
Average (All Utilities)	9.75%
Average (Distribution Only)	9.51%
Average (Distribution Only, exc. IL FRP)	9.57%
Average (Vertically Integrated Only)	9.91%

Source: SNL Financial LC, December 16, 2014

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Direct Testimony and Exhibits of Steve W. Chriss, submitted on behalf of Wal-Mart Stores East, LP and Sam's East, Inc., was served by electronic mail, upon the following Parties of Record on this 22<sup>nd</sup> day of December, 2014.

/s/ Lisa M. Hawrot

Lisa M. Hawrot (Ohio Bar ID 0080098)

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Summary: Testimony Direct Testimony and Exhibits of Steve W. Chriss electronically filed by Derrick P Williamson on behalf of Wal-Mart Stores East, LP and Sam's East, Inc.