

BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION SEEKING	)	
APPROVAL OF OHIO POWER COMPANY'S	)	
PROPOSAL TO ENTER INTO AN AFFILIATE	)	
POWER PURCHASE AGREEMENT	)	CASE NO. 14-1693-EL-RDR
FOR INCLUSION IN THE POWER PURCHASE	)	
AGREEMENT RIDER	)	

IN THE MATTER OF THE APPLICATION OF	)	
OHIO POWER COMPANY FOR APPROVAL OF	)	CASE NO. 14-1694-EL-AAM
CERTAIN ACCOUNTING AUTHORITY	)	

DIRECT TESTIMONY AND EXHIBITS OF STEVE W. CHRISS

ON BEHALF OF

WAL-MART STORES EAST, LP,

AND

SAM'S EAST, INC.

Filed: September 11, 2015

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**Introduction**

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

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

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

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

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

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

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

3       A.     Yes. I submitted testimony in Case Nos. 10-2586-EL-SSO, 11-346-EL-SSO, 12-426-EL-  
4       SSO, 13-2385-EL-SSO, 14-481-EL-SSO, and 14-1297-EL-SSO.

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

7       A.     Yes. I have submitted testimony in over 120 proceedings before 34 other utility  
8       regulatory commissions and before the Missouri House Committee on Utilities, the  
9       Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs  
10      Committee, and the Kansas House Standing Committee on Utilities and  
11      Telecommunications. My testimony has addressed topics including, but not limited  
12      to, cost of service and rate design, revenue requirement, ratemaking policy,  
13      qualifying facility rates, telecommunications deregulation, resource certification,  
14      energy efficiency/demand side management, fuel cost adjustment mechanisms,  
15      decoupling, and the collection of cash earnings on construction work in progress  
16      ("CWIP").

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

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

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

2       A.     Walmart operates 175 retail units and employs 49,326 associates in Ohio. In fiscal  
3             year ending 2015, Walmart purchased \$14.5 billion worth of goods and services  
4             from Ohio-based suppliers, supporting 96,675 supplier jobs.<sup>1</sup>

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

7       A.     Walmart has approximately 57 stores, four distribution centers, and several related  
8             facilities that take service from Ohio Power Company ("OPC" or "the Company").  
9

10    **Purpose of Testimony and Summary of Recommendations**

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

12    A.     The purpose of my testimony is to respond to the application of OPC to include the  
13             Company's Ohio Valley Electric Corporation ("OVEC") share and proposed Affiliate  
14             Purchase Power Agreement ("PPA") in the Company's placeholder PPA rider ("PPA  
15             rider") authorized by the Commission in Case No. 13-2385-EL-SSO.

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

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

- 18           1)     Assuming a determination in this case would not be stayed pending the  
19                   appeals process, the Commission, if it approves some amount of recovery of  
20                   the Company's proposed PPA units through the PPA rider, should make that  
21                   recovery subject to refund until the appeals process is complete.

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

- 1           2)     The Commission should reject the Company's proposal to engage in the  
2                 affiliate PPA and include those costs, and the costs of the Company's OVEC  
3                 share, in the PPA rider.
- 4           3)     If the Commission approves some amount of recovery of the Company's  
5                 proposed PPA units through the PPA rider, it should set the ROE for the PPA  
6                 at a level similar to vertically integrated utilities and commensurate with the  
7                 risk reduction afforded by any approved regulatory protections.
- 8           4)     The Commission should reject the Company's proposed index + adder  
9                 formula rate mechanism. If the Commission determines a formula rate  
10                mechanism is appropriate for any approved PPA, it should set the  
11                mechanism such that the range of results will reasonably reflect the risk  
12                reduction afforded by any approved regulatory protections.

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

15

16   **Relationship of the Instant Case to 13-2385-EL-SSO Appeals**

17       **Q.     IS IT YOUR UNDERSTANDING THAT THE COMMISSION'S AUTHORIZATION OF THE**  
18       **PLACEHOLDER PPA IS SUBJECT TO LEGAL CHALLENGE AT THIS TIME?**

19       **A.**     Yes. From my examination of the case documents in Case No. 13-2385-EL-SSO, it  
20           appears that both the Industrial Energy Users of Ohio and the Office of the Ohio  
21           Consumers' Counsel have filed appeals with the Supreme Court of Ohio.

1       **Q.     DO YOU HAVE A CONCERN THAT SENATE BILL 221 APPEARS TO IMPLICATE THE USE**  
2       **OF THE PPA RIDER AS PROPOSED BY THE COMPANY?**

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

4               Ensure effective competition in the provision of retail electric service by  
5               avoiding anticompetitive subsidies flowing from a noncompetitive retail  
6               electric service to a competitive retail electric service or to a product or  
7               service other than retail electric service, and vice versa, including by  
8               prohibiting the recovery of any generation-related costs through  
9               distribution or transmission rates.

10              The provision of market price mitigation through the use of the AEP Generation  
11              Resources ("AEPGR") and OVEC generation assets as proposed by the Company is a  
12              generation-related service and, on its face, would appear to be prohibited by the  
13              statute. My understanding is that this and related issues are part of the appeals in  
14              Case No. 13-2385-EL-SSO.

15       **Q.     SHOULD THE COMMISSION CONSIDER THE APPEALS PROCESS IN ITS TREATMENT**  
16       **OF THE COMPANY'S PROPOSED PPA RIDER IN THIS CASE?**

17       **A.     Yes. Assuming a determination in this case would not be stayed pending the appeals**  
18               process, the Commission, if it approves some amount of recovery of the Company's  
19               proposed PPA units through the PPA rider, should make that recovery subject to  
20               refund until the appeals process is complete.

21  
22    **OPC'S PPA Proposal**

23       **Q.     WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PPA PROPOSAL?**

24       **A.     My understanding is that the Company proposes to enter in to a PPA with AEPGR for**  
25               the output of the Cardinal, Conesville, Stuart, and Zimmer generation units.

1 Additionally, the Company proposes to include its share of the output of the OVEC  
2 units in the PPA rider. See Direct Testimony of Pablo A. Vegas, page 11, line 22 to  
3 page 12, line 6. The Company proposes that the PPA be for delivery through the  
4 entire commercial operational life of the PPA units, including "any post-retirement  
5 period necessary to fulfill all asset retirement obligations and complete any other  
6 removal projects." See Exhibit KDP-1, page 1.

7 **Q. HOW DOES THE COMPANY PROPOSE TO CALCULATE THE REVENUE REQUIREMENT**  
8 **OF THE PPA RIDER?**

9 A. The Company proposes to calculate the revenue requirement as the difference  
10 between the costs of the PPA units and OVEC units and the PJM market revenues  
11 that the Company would receive for selling the energy, capacity, and ancillary  
12 services from the plants. See Exhibit WAA-1.

13 **Q. WHAT GENERATION COSTS DOES THE COMPANY PROPOSE BE INCLUDED IN THE**  
14 **PPA?**

15 A. The Company proposes to include the following costs in the PPA:

- 16 1) Fuel and operations and maintenance costs, including, "without  
17 limitation," fuel, fuel handling, storage, transportation, transloading,  
18 hedging, and sales, and consumables, chemicals, emissions costs,  
19 operations and maintenance costs, administrative and general costs,  
20 accretion expense, and overheads;
- 21 2) Depreciation and amortization expense, including remaining net book  
22 value if a unit is retired;



1           3)           Cost of capital, with the return of equity set based on the Moody's Long-  
2                   term Baa corporate bond index plus 650 basis points, within a band of 8.9  
3                   percent to 15.9 percent, applied to the net book value of the PPA units,  
4                   which would include CWIP;

5           4)           Tax reimbursement; and

6           5)           "Other miscellaneous," which includes recovery of forecasted retirement  
7                   costs. See Exhibit KDP-1, page 2 to page 4.

8       **Q.     WHAT IS THE COMPANY'S PROPOSED INITIAL ROE PER THEIR PROPOSED**  
9       **FORMULA?**

10      A.     The Company's proposed initial ROE per their proposed formula is 11.24 percent.  
11           See Direct Testimony of Renee V. Hawkins, page 7, line 2.

12      **Q.     WHAT RECONCILIATION PERIOD DOES THE COMPANY PROPOSE FOR THE PPA**  
13      **RIDER?**

14      A.     The Company proposes to forecast PPA rider costs on an annual basis but reconcile  
15           the recovery balance on a quarterly basis. See Direct Testimony of William A. Allen,  
16           page 9, line 10 to line 13.

17      **Q.     DOES THE COMPANY'S FILING PROVIDE ILLUSTRATIVE PPA RIDER RATES?**

18      A.     Only for the first year, and that the initial rate would be \$1.75/MWh. Id., page 13,  
19           line 12.

**General Concerns with the Company's Proposal**

**Q. DO YOU HAVE CONCERNS WITH THE COMPANY'S PROPOSAL?**

A. Yes, I have several concerns. First, it is simply not appropriate to require captive distribution customers of the regulated retail utility to financially assist an unregulated affiliate that operates in the competitive wholesale generation market. This concern is exacerbated by the nature of the proposal itself, as the Company proposes to treat customers as if they took service in a traditional vertically integrated utility paradigm, with customers essentially bearing the current and future financial, regulatory, and operational risks of the AEPGR units and OVEC plants. Yet, unlike a traditional vertically integrated utility paradigm, it is not clear that the regulatory protection sought by the Company would come with the same requisite regulatory oversight. Further, the Company's proposed ROE of 11.24 percent for the purchased power agreements is far higher than regulated ROEs recently awarded by commissions nationwide and does not reflect risk reduction inherent in the "known revenue stream commensurate with the actual costs" provided by the PPA rider. See Direct Testimony of Pablo A. Vegas, page 11, line 10 to line 11.

In total, the Commission should not approve a proposal that would provide regulatory protection for generation plant assets at a cost that exceeds what ratepayers would otherwise pay for the plant if it were it owned by a vertically integrated utility and with less Commission oversight of those assets. The Company has presented its proposal as an "insurance policy" for customers to hedge against

price spikes caused by market volatility, but ultimately the PPA rider appears to be structured as an "insurance policy" to protect the Company's and AEPGR's interests from the competitive generation markets. Id. page 7, line 3 to line 4.

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

A. The Company proposes that the Commission have the ability to review and approve the PPA rider rates in a manner similar to the review of the Fuel Adjustment Clause Mechanism. See Direct Testimony of William A. Allen, page 10, line 3 to line 5. However, the breadth of costs the Company proposes to include, including costs not directly related to the output of the plants such as CWIP and retirement costs, suggests that the proposed review may be insufficient, given what the Company is asking of its captive distribution customers. It is not clear whether the scope of any related Commission determinations as to prudence and cost recovery would be limited, or if the Commission would have the authority to direct or review the planning and costs incurred by AEPGR or OVEC in their management of the plants. This authority is important given the potential for operational decisions and expenditures necessary to comply with federal regulations, as customers, not shareholders, would be exposed to recovery of potentially significant costs over which the Commission would appear to have little oversight or decision making authority.

1       **Q.     DO YOU HAVE ANY ADDITIONAL CONCERNS REGARDING THE COMPANY'S**  
2       **PROPOSAL?**

3       A.     Yes. The Company's proposal and the existing PPA rider are essentially a mechanism  
4       that inappropriately transfers the risk exposure of AEPGR's plant ownership and  
5       OPC's ownership share of OVEC to customers. Regardless of prices in the energy or  
6       capacity markets or the performance, efficiency, or economics of the generation  
7       assets relative to their competitors in the market, the PPA rider will provide OPC and  
8       its affiliates with revenue assurance for their cost exposure for generation assets  
9       proposed to be included in the PPA. Those generation assets, which operate in the  
10      wholesale market, will be given cost recovery assurance not afforded to all other  
11      generators in the market. Additionally, as I will discuss in more detail below, the  
12      Company's proposal will provide the assets with a return on equity not  
13      commensurate with essentially vertically integrated regulatory treatment of the  
14      assets and the associated reduction of risk provided by the proposed regulatory  
15      protections.

16               Additionally, while the plants' output is not being offered specifically as  
17      generation service to customers, the Company is proposing to charge or credit  
18      *distribution* customers for the costs of a generation-related service, which is the use  
19      of the generation assets as a hedge against generation market price volatility. As  
20      such, although the Commission ruled in Case No. 13-2385-EL-SSO that the PPA rider  
21      is not bypassable, from a cost of service perspective it is not appropriate to assess  
22      the PPA rider charge or credit to competitively supplied customers, since the price

1           paid to the supplier by such customers already includes the cost of power and the  
2           cost of procurement for that power, compliance costs, and other underlying  
3           operating costs, such as risk management and hedge costs.

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

5           A.     The Commission should reject the Company's proposal to engage in the affiliate PPA  
6           and include those costs, and the costs of the Company's OVEC share, in the PPA  
7           rider.

8  
9           **Proposed PPA Capital Structure and Return on Equity**

10          **Q.     IS THE COMPANY'S PROPOSED ROE FOR THE PURCHASED POWER AGREEMENT**  
11          **HIGHER THAN THOSE APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS?**

12          A.     Yes. The proposed ROE of 11.24 percent is higher than the ROEs approved by other  
13          utility regulatory commissions in 2012, 2013, 2014, and so far in 2015. Additionally,  
14          the proposed ROE is significantly higher than 10.0 percent and 10.3 percent, the  
15          ROEs awarded to Columbus Southern Power and Ohio Power, respectively, in the  
16          Company's last base rate case, and those ROEs are themselves higher than the  
17          average of more recently authorized ROEs nationally, particularly for wires-only  
18          utilities. See December 14, 2011 Opinion and Order in Case Nos. 11-351-EL-AIR and  
19          11-352-EL-AIR, page 12.

1       **Q.   WHAT IS YOUR UNDERSTANDING OF THE RETURNS ON EQUITY APPROVED FOR**  
2       **ELECTRIC UTILITIES BY COMMISSIONS NATIONWIDE IN 2012, 2013, 2014, AND SO**  
3       **FAR IN 2015?**

4       A.   According to data from SNL Financial<sup>2</sup>, a financial news and reporting company, the  
5       average of the 133 reported electric utility rate case ROEs authorized by  
6       commissions to investor-owned electric utilities in 2012, 2013, 2014, and so far in  
7       2015 is 9.86 percent. The range of reported authorized ROEs for the period is 8.72  
8       percent to 10.95 percent, and the median authorized ROE is 9.80 percent. The  
9       Company's proposed initial ROE exceeds the average authorized ROE for the period  
10      by 138 basis points. See Exhibit SWC-2, page 5.

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

13      A.   Yes. The average reported ROE for distribution only utilities or for rate cases that  
14      only dealt with distribution rates was 9.52 percent. Id.

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

17      A.   Yes. The average authorized ROE for distribution only utilities in 2012 was 9.75  
18      percent, in 2013 was 9.37 percent, in 2014 was 9.49 percent, and so far in 2015 is  
19      9.25 percent. It should be noted that the 2012, 2013, and 2014 values include  
20      authorized ROEs for Commonwealth Edison and Ameren Illinois that are set by a

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

1 statutory formula, so excluding those values result in an average authorized ROE in  
2 2012 of 9.75 percent, in 2013 of 9.56 percent, and in 2014 of 9.53 percent. Id.

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

5 A. In the group reported by SNL Financial, the average authorized ROE for vertically  
6 integrated utilities from 2012 to present is 9.99 percent. Id. However, there is a  
7 declining trend for vertically integrated utilities from 2012 to present.

8 **Q. PLEASE EXPLAIN.**

9 A. The average authorized ROE for vertically integrated utilities in 2012 was 10.1  
10 percent, in 2013 it was 9.97 percent, in 2014 it was 9.92 percent, and so far in 2015  
11 it is 9.69 percent. Id.

12 **Q. IN LIGHT OF THIS, DO YOU BELIEVE THE COMPANY'S PROPOSED ROE OF 11.24**  
13 **PERCENT AS APPLIED TO THE PURCHASED POWER AGREEMENT IS REASONABLE?**

14 A. No. It is not reasonable.

15 **Q. IS IT YOUR UNDERSTANDING THAT THE ROE APPLIED TO THE PPA COULD CHANGE**  
16 **FROM YEAR TO YEAR?**

17 A. Yes. The Company proposes to set the ROE using a formula rate mechanism based  
18 on the Moody's Long-term Baa corporate bond index plus 650 basis points ("index +  
19 adder methodology"), within a band of 8.9 percent to 15.9 percent. See Direct  
20 Testimony of Renee V. Hawkins, page 6, line 16 to page 17, line 8.

1       **Q.     DO YOU HAVE CONCERNS WITH THE COMPANY'S PROPOSED FORMULA?**

2       A.     Yes. While a few states use annual formula rate reviews in the retail ratemaking  
3             process, the formula proposed by the Company is, in my experience, not widely  
4             accepted as a retail ratemaking mechanism. To my knowledge, the only significant  
5             usage of the index + adder methodology at the retail ratemaking level is in Illinois,  
6             but the methodology was imposed upon the Illinois Commerce Commission by the  
7             legislature, not through commission approval of a fully litigated proposal. See 220  
8             ILCS 5/16-108.5(c)(3)(B).

9       **Q.     DOES THE ILLINOIS INDEX + ADDER METHODOLOGY HAVE SIGNIFICANT**  
10       **DIFFERENCES FROM THE FORMULA PROPOSED BY THE COMPANY?**

11      A.     Yes. The first difference is that the Illinois methodology uses an average of the  
12             monthly average yields of the 30-year U.S. Treasury bonds for the applicable  
13             calendar year, not the Moody's index as proposed by the Company. Id.

14      **Q.     IS THE MOODY'S INDEX SIGNIFICANTLY HIGHER THAN THE 30-YEAR U.S. TREASURY**  
15      **BOND INDEX?**

16      A.     Yes. An examination of the values for both indices, as they would have been  
17             applied, for 2010 through 2014 shows that, on average, the Moody's index value is  
18             5.22 percent and the 30-year U.S. Treasury bond value is 3.57 percent, a difference  
19             of 165 basis points. See Exhibit SWC-3.

20      **Q.     IS THE COMPANY'S PROPOSED ADDER ALSO HIGHER THAN THE ILLINIOS ADDER?**

21      A.     Yes. The Company's proposed adder is 650 basis points and the Illinois adder is 580  
22             basis points. It is worth noting that the Company does not provide an explanation



for the amount of their adder, other than that it is what OPC and AEPGR developed.

See Direct Testimony of Renee V. Hawkins, page 6, line 16 to line 17.

**Q. DO THE ROES PRODUCED BY EACH FORMULA DIFFER SIGNIFICANTLY?**

**A.** Yes. As shown in Figure 1, the ROEs derived by the Company's proposed formula are significantly higher than those produced by the Illinois formula.

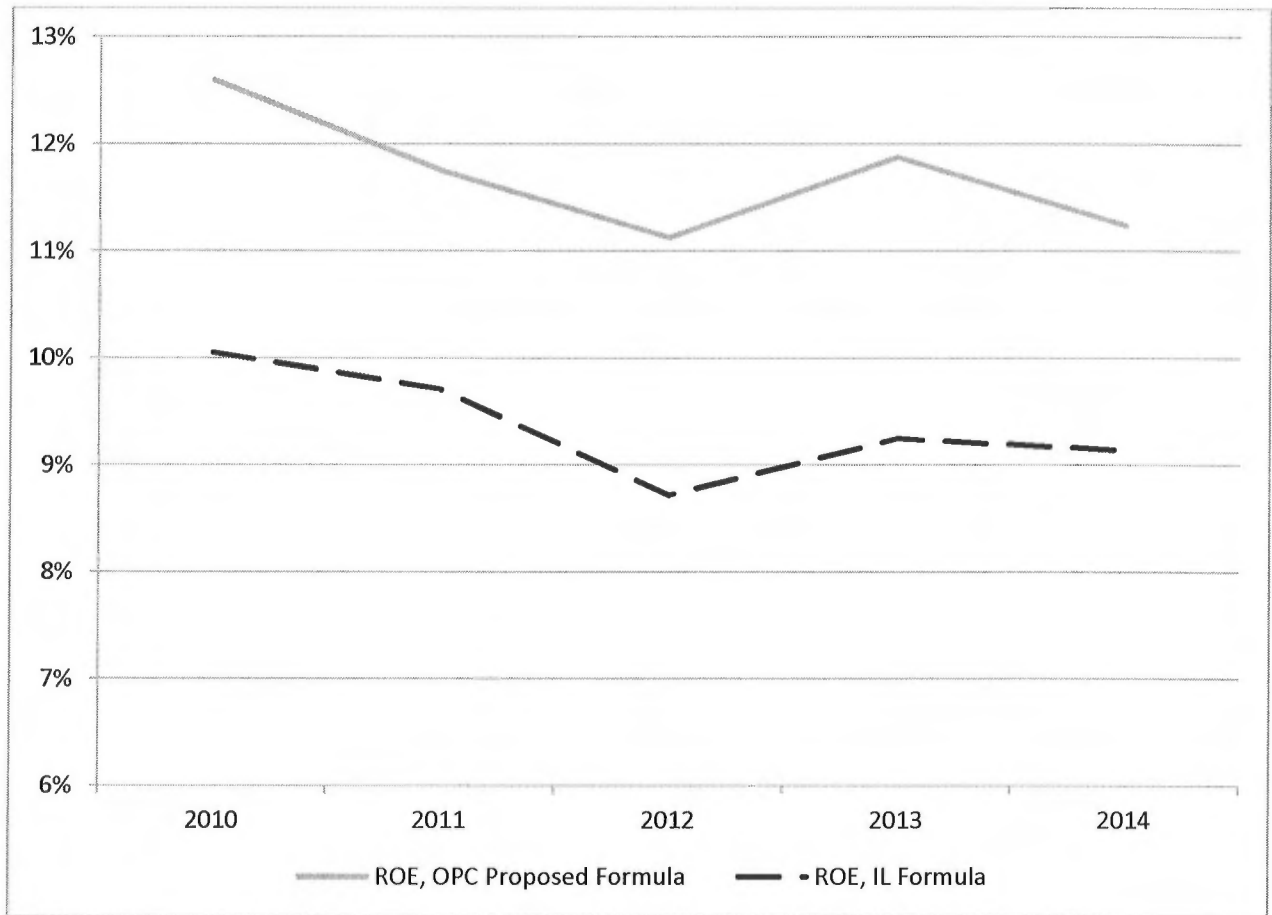


Figure 1. ROEs Produced by the OPC Proposed Formula vs. ROEs Produced by the Illinois Statutory Formula.

On average, the Company's proposed formula produces ROEs 235 basis points higher than the Illinois statutory formula. See Exhibit SWC-3. It should be noted that the Illinois utilities to whom the formula is applied are distribution-only utilities and not vertically integrated.

1       **Q.     DO THE COMPANY'S PROPOSED CAP AND FLOOR PROVIDE ANY BENEFIT TO**  
2       **CUSTOMERS?**

3       A.     No. Applying the Company's proposed index + adder mechanism to historical  
4       Moody's data back to 1929 shows that the cap would only have been triggered 18 of  
5       the 96 years, and most recently in 1990, and the floor would never have been  
6       triggered. To wit, only 6 of the 96 years produced a ROE below 10 percent, with a  
7       minimum ROE of 9.6 percent in 1945. See Exhibit SWC-4.

8       **Q.     WHAT IS THE AVERAGE ROE FROM 1919 TO PRESENT THAT RESULTS FROM AN**  
9       **APPLICATION OF THE COMPANY'S PROPOSED INDEX + ADDER MECHANISM WITH**  
10       **THE FLOOR AND CAP IN PLACE?**

11       A.     13.13 percent. Id. Figure 2 charts the annual ROEs produced by the Company's  
12       proposed mechanism with the floor and cap in place.

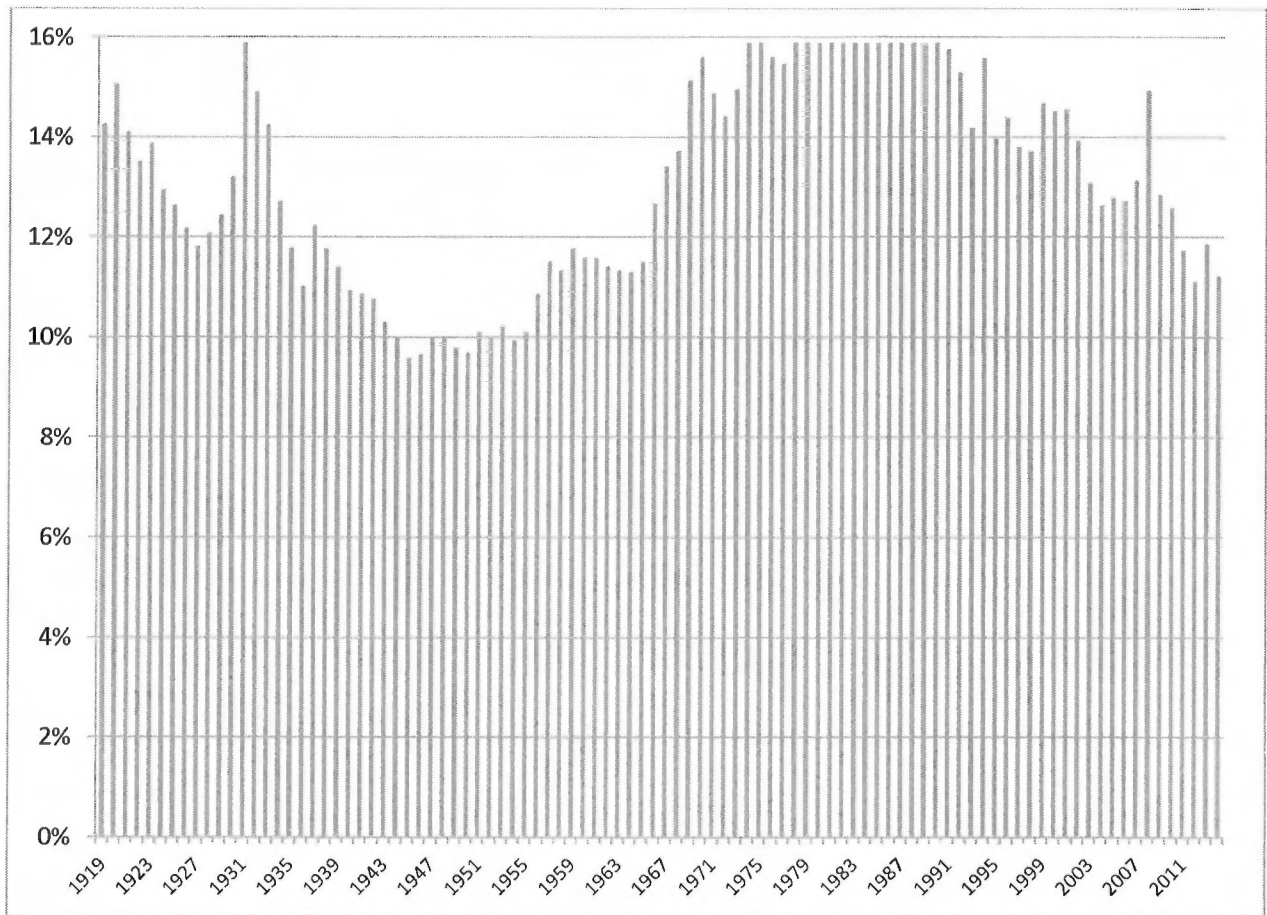


Figure 2. Annual ROEs Produced by the Company's Proposed Index + Adder Mechanism, 1929 to 2014.

**Q. ARE YOU CONCERNED THAT THE COMPANY'S PROPOSED INDEX + ADDER MECHANISM WILL PRODUCE UNREASONABLE RESULTS OVER THE LIFETIME OF THE PROPOSED PPA?**

**A.** Yes, based on the historical performance, with the caveat that past performance is not a perfect predictor of future results.

**Q. WHAT ARE YOUR RECOMMENDATIONS TO THE COMMISSION ON THIS ISSUE?**

**A.** First, if the Commission approves some amount of recovery of the Company's proposed PPA units through the PPA rider, it should set the ROE for the PPA at a level similar to vertically integrated utilities and commensurate with the risk

1 reduction afforded by any approved regulatory protections. Second, the  
2 Commission should reject the Company's proposed index + adder formula rate  
3 mechanism. If the Commission determines a formula rate mechanism is appropriate  
4 for any approved PPA, it should set the mechanism such that the range of results will  
5 reasonably reflect the risk reduction afforded by any approved regulatory  
6 protections.

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

8 **A. Yes.**

**BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE APPLICATION SEEKING</b>	<b>)</b>	
<b>APPROVAL OF OHIO POWER COMPANY'S</b>	<b>)</b>	
<b>PROPOSAL TO ENTER INTO AN AFFILIATE</b>	<b>)</b>	
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<b>FOR INCLUSION IN THE POWER PURCHASE</b>	<b>)</b>	
<b>AGREEMENT RIDER</b>	<b>)</b>	

<b>IN THE MATTER OF THE APPLICATION OF</b>	<b>)</b>	
<b>OHIO POWER COMPANY FOR APPROVAL OF</b>	<b>)</b>	<b>CASE NO. 14-1694-EL-AAM</b>
<b>CERTAIN ACCOUNTING AUTHORITY</b>	<b>)</b>	

**EXHIBITS OF STEVE W. CHRISS**

**ON BEHALF OF**

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

**BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE APPLICATION SEEKING</b>	<b>)</b>	
<b>APPROVAL OF OHIO POWER COMPANY'S</b>	<b>)</b>	
<b>PROPOSAL TO ENTER INTO AN AFFILIATE</b>	<b>)</b>	
<b>POWER PURCHASE AGREEMENT</b>	<b>)</b>	<b>CASE NO. 14-1693-EL-RDR</b>
<b>FOR INCLUSION IN THE POWER PURCHASE</b>	<b>)</b>	
<b>AGREEMENT RIDER</b>	<b>)</b>	

<b>IN THE MATTER OF THE APPLICATION OF</b>	<b>)</b>	
<b>OHIO POWER COMPANY FOR APPROVAL OF</b>	<b>)</b>	<b>CASE NO. 14-1694-EL-AAM</b>
<b>CERTAIN ACCOUNTING AUTHORITY</b>	<b>)</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

Wal-Mart Stores, Inc.

Business Address: 2001 SE 10<sup>th</sup> Street, Bentonville, AR, 72716-0550

Business Phone: (479) 204-1594

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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

2015

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

Arkansas 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 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 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.

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

Kansas 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.

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.

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 14-1693-EL-RDR and 14-1694-EL-AAM**

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.

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 14-1693-EL-RDR and 14-1694-EL-AAM**

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

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

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

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

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

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

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

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

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

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

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

**2012**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **2011**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 14-1693-EL-RDR and 14-1694-EL-AAM**

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**

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**AFFIDAVITS**

**2015**

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**ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

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.

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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.

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**BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE APPLICATION SEEKING</b>	<b>)</b>	
<b>APPROVAL OF OHIO POWER COMPANY'S</b>	<b>)</b>	
<b>PROPOSAL TO ENTER INTO AN AFFILIATE</b>	<b>)</b>	
<b>POWER PURCHASE AGREEMENT</b>	<b>)</b>	<b>CASE NO. 14-1693-EL-RDR</b>
<b>FOR INCLUSION IN THE POWER PURCHASE</b>	<b>)</b>	
<b>AGREEMENT RIDER</b>	<b>)</b>	

<b>IN THE MATTER OF THE APPLICATION OF</b>	<b>)</b>	
<b>OHIO POWER COMPANY FOR APPROVAL OF</b>	<b>)</b>	<b>CASE NO. 14-1694-EL-AAM</b>
<b>CERTAIN ACCOUNTING AUTHORITY</b>	<b>)</b>	

**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	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
South Carolina	Duke Energy Carolinas LLC	2011-271-E	1/25/2012	V	10.50%
North Carolina	Duke Energy Carolinas LLC	E-7, Sub 989	1/27/2012	V	10.50%
Michigan	Indiana Michigan Power Co.	U-16801	2/15/2012	V	10.20%
Oregon	Idaho Power Co.	UE-233	2/23/2012	V	9.90%
Florida	Gulf Power Co.	110138-EI	2/27/2012	V	10.25%
North Dakota	Northern States Power Co.	PU-10-657	2/29/2012	V	10.40%
Minnesota	Northern States Power Co.	E-002/GR-10-971	3/29/2012	V	10.37%
Hawaii	Hawaii Electric Light Co	2009-0164	4/4/2012	V	10.00%
Colorado	Public Service Co. of CO	11AL-947E	4/26/2012	V	10.00%
Hawaii	Maui Electric Company Ltd	2009-0163	5/2/2012	V	10.00%
Washington	Puget Sound Energy Inc.	UE-111048	5/7/2012	V	9.80%
Arizona	Arizona Public Service Co.	E-01345A-11-0224	5/15/2012	V	10.00%
Illinois	Commonwealth Edison Co.	11-0721	5/29/2012	D	10.05%
Michigan	Consumers Energy Co.	U-16794	6/7/2012	V	10.30%
New York	Orange & Rockland Utlts Inc.	11-E-0408	6/14/2012	D	9.40%
Wisconsin	Wisconsin Power and Light Co	6680-UR-118	6/15/2012	V	10.40%
Wyoming	Cheyenne Light Fuel Power Co.	20003-114-ER-11	6/18/2012	V	9.60%
South Dakota	Northern States Power Co.	EL11-019	6/19/2012	V	9.25%
Michigan	Wisconsin Electric Power Co.	U-16830	6/26/2012	V	10.10%
Hawaii	Hawaiian Electric Co.	2010-0080	6/29/2012	V	10.00%
Oklahoma	Oklahoma Gas and Electric Co.	PUD201100087	7/9/2012	V	10.20%
Wyoming	PacifiCorp	20000-405-ER-11	7/16/2012	V	9.80%
Maryland	Potomac Electric Power Co.	9286	7/20/2012	D	9.31%
Maryland	Delmarva Power & Light Co.	9285	7/20/2012	D	9.81%
Texas	Entergy Texas Inc.	39896	9/13/2012	V	9.80%
Illinois	Ameren Illinois	12-0001	9/19/2012	D	10.05%
Utah	PacifiCorp	11-035-200	9/19/2012	V	9.80%
District of Columbia	Potomac Electric Power Co.	1087	9/26/2012	D	9.50%
New Jersey	Atlantic City Electric Co.	ER-11080469	10/23/2012	D	9.75%
Wisconsin	Wisconsin Public Service Corp.	6690-UR-121	10/24/2012	V	10.30%
Wisconsin	Madison Gas and Electric Co.	3270-UR-118	11/9/2012	V	10.30%
Wisconsin	Wisconsin Electric Power Co.	05-UR-106	11/28/2012	V	10.40%
Delaware	Delmarva Power & Light Co.	11-528	11/29/2012	D	9.75%
California	Liberty Utilities LLC	12-02-014	11/29/2012	V	9.88%
Illinois	Ameren Illinois	12-0293	12/5/2012	D	9.71%
Pennsylvania	PPL Electric Utilities Corp.	R-2012-2290597	12/5/2012	D	10.40%
Missouri	Union Electric Co.	ER-2012-0166	12/12/2012	V	9.80%
Kansas	Kansas City Power & Light	12-KCPE-764-RTS	12/13/2012	V	9.50%
Florida	Florida Power & Light Co.	120015-EI	12/13/2012	V	10.50%
Wisconsin	Northern States Power Co.	4220-UR-118	12/14/2012	V	10.40%
Illinois	Commonwealth Edison Co.	12-0321	12/19/2012	D	9.71%
South Carolina	South Carolina Electric & Gas	2012-218-E	12/19/2012	V	10.25%
Rhode Island	Narragansett Electric Co.	4323	12/20/2012	D	9.50%

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

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Oregon	PacifiCorp	UE-246	12/20/2012	V	9.80%
Kentucky	Kentucky Utilities Co.	2012-00221	12/20/2012	V	10.25%
Kentucky	Louisville Gas & Electric Co.	2012-00222	12/20/2012	V	10.25%
California	San Diego Gas & Electric Co.	12-04-016	12/20/2012	V	10.30%
California	Pacific Gas and Electric Co.	12-04-018	12/20/2012	V	10.40%
California	Southern California Edison Co.	12-04-015	12/20/2012	V	10.45%
North Carolina	Virginia Electric & Power Co.	E-22, Sub 479	12/21/2012	V	10.20%
Washington	Avista Corp.	UE-120436	12/26/2012	V	9.80%
Missouri	Kansas City Power & Light	ER-2012-0174	1/9/2013	V	9.70%
Missouri	KCP&L Greater Missouri Op Co	ER-2012-0175	1/9/2013	V	9.70%
Indiana	Indiana Michigan Power Co.	44075	2/13/2013	V	10.20%
Maryland	Baltimore Gas and Electric Co.	9299	2/22/2013	D	9.75%
Louisiana	Southwestern Electric Power Co	U-32220	2/27/2013	V	10.00%
New York	Niagara Mohawk Power Corp.	12-E-0201	3/14/2013	D	9.30%
Idaho	Avista Corp.	AVU-E-12-08	3/27/2013	V	9.80%
Ohio	Duke Energy Ohio Inc.	12-1682-EL-AIR	5/1/2013	D	9.84%
Michigan	Consumers Energy Co.	U-17087	5/15/2013	V	10.30%
North Carolina	Duke Energy Progress Inc.	E-2, Sub 1023	5/30/2013	V	10.20%
Hawaii	Maui Electric Company Ltd	2011-0092	5/31/2013	V	9.00%
Arizona	Tucson Electric Power Co.	E-01933A-12-0291	6/11/2013	V	10.00%
New Jersey	Atlantic City Electric Co.	ER-12121071	6/21/2013	D	9.75%
Washington	Puget Sound Energy Inc.	UE-130137	6/25/2013	V	9.80%
Maryland	Potomac Electric Power Co.	9311	7/12/2013	D	9.36%
Minnesota	Northern States Power Co.	E-002/GR-12-961	8/8/2013	V	9.83%
Connecticut	United Illuminating Co.	13-01-19	8/14/2013	D	9.15%
South Carolina	Duke Energy Carolinas LLC	2013-59-E	9/11/2013	V	10.20%
Florida	Tampa Electric Co.	130040-EI	9/11/2013	V	10.25%
North Carolina	Duke Energy Carolinas LLC	E-7, Sub 1026	9/24/2013	V	10.20%
Texas	Southwestern Electric Power Co	40443	10/3/2013	V	9.65%
Wisconsin	Wisconsin Public Service Corp.	6690-UR-122	11/6/2013	V	10.20%
Kansas	Westar Energy Inc.	13-WSEE-629-RTS	11/21/2013	V	10.00%
Virginia	Virginia Electric & Power Co.	PUE-2013-00020	11/26/2013	V	10.00%
Florida	Gulf Power Co.	130140-EI	12/3/2013	V	10.25%
Washington	PacifiCorp	UE-130043	12/4/2013	V	9.50%
Wisconsin	Northern States Power Co.	4220-UR-119	12/5/2013	V	10.20%
Illinois	Ameren Illinois	13-0301	12/9/2013	D	8.72%
Oregon	Portland General Electric Co.	UE-262	12/9/2013	V	9.75%
Maryland	Baltimore Gas and Electric Co.	9326	12/13/2013	D	9.75%
Louisiana	Entergy Gulf States LA LLC	U-32707	12/16/2013	V	9.95%
Louisiana	Entergy Louisiana LLC	U-32708	12/16/2013	V	9.95%
Nevada	Sierra Pacific Power Co.	13-06002	12/16/2013	V	10.12%

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

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Arizona	UNS Electric Inc.	E-04204A-12-0504	12/17/2013	V	9.50%
Georgia	Georgia Power Co.	36989	12/17/2013	V	10.95%
Illinois	Commonwealth Edison Co.	13-0318	12/18/2013	D	8.72%
Oregon	PacifiCorp	UE-263	12/18/2013	V	9.80%
Michigan	Upper Peninsula Power Co.	U-17274	12/19/2013	V	10.15%
New York	Consolidated Edison Co. of NY	13-E-0030	2/20/2014	D	9.20%
North Dakota	Northern States Power Co.	PU-12-813	2/26/2014	V	9.75%
New Hampshire	Liberty Utilities Granite St	DE-13-063	3/17/2014	D	9.55%
District of Columbia	Potomac Electric Power Co.	1103-2013-E	3/26/2014	D	9.40%
New Mexico	Southwestern Public Service Co	12-00350-UT	3/26/2014	V	9.96%
Delaware	Delmarva Power & Light Co.	13-115	4/2/2014	D	9.70%
Texas	Entergy Texas Inc.	41791	5/16/2014	V	9.80%
Massachusetts	Fitchburg Gas & Electric Light	13-90	5/30/2014	D	9.70%
Wisconsin	Wisconsin Power and Light Co	6680-UR-119	6/6/2014	V	10.40%
Maine	Emera Maine	2013-00443	6/30/2014	D	9.55%
Maryland	Potomac Electric Power Co.	9336	7/2/2014	D	9.62%
Louisiana	Entergy Louisiana LLC (New Orleans)	UD-13-01	7/10/2014	V	9.95%
New Jersey	Rockland Electric Company	ER-13111135	7/23/2014	D	9.75%
Maine	Central Maine Power Co.	2013-00168	7/29/2014	D	9.45%
Wyoming	Cheyenne Light Fuel Power Co.	20003-132-ER-13	7/31/2014	V	9.90%
Arkansas	Entergy Arkansas Inc.	13-028-U <sup>1</sup>	8/15/2014	V	9.50%
New Jersey	Atlantic City Electric Co.	ER-14030245	8/20/2014	D	9.75%
Vermont	Green Mountain Power Corp	8190, 8191	8/25/2014	V	9.60%
Utah	PacifiCorp	13-035-184	8/29/2014	V	9.80%
Florida	Florida Public Utilities Co.	140025-EI	9/15/2014	V	10.25%
Nevada	Nevada Power Co.	14-05004	10/9/2014	V	9.80%
Illinois	MidAmerican Energy Co.	14-0066	11/6/2014	V	9.56%
Wisconsin	Wisconsin Public Service Corp.	6690-UR-123	11/6/2014	V	10.20%
Wisconsin	Wisconsin Electric Power Co.	05-UR-107	11/14/2014	V	10.20%
Virginia	Appalachian Power Co.	PUE-2014-00026	11/26/2014	V	9.70%
Wisconsin	Madison Gas and Electric Co.	3270-UR-120	11/26/2014	V	10.20%
Oregon	Portland General Electric Co.	UE-283	12/4/2014	V	9.68%
Illinois	Commonwealth Edison Co.	14-0312	12/10/2014	D	9.25%
Illinois	Ameren Illinois	14-0317	12/10/2014	D	9.25%
Mississippi	Entergy Mississippi Inc.	2014-UN-0132	12/11/2014	V	10.07%
Wisconsin	Northern States Power Co.	4220-UR-120	12/12/2014	V	10.20%
Connecticut	Connecticut Light & Power Co.	14-05-06	12/17/2014	D	9.17%
Colorado	Black Hills Colorado Electric	14AL-0393E	12/18/2014	V	9.83%
Wyoming	PacifiCorp	20000-446-ER-14	1/23/2015	V	9.50%
Colorado	Public Service Co. of CO	14AL-0660E	2/24/2015	V	9.83%
New Jersey	Jersey Central Power & Light Co.	ER-12111052	3/18/2015	D	9.75%
Washington	PacifiCorp	UE-140762	3/25/2015	V	9.50%
Minnesota	Northern States Power Co.	E-002/GR-13-868	3/26/2015	V	9.72%

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

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Michigan	Wisconsin Public Service Corp.	U-17669	4/23/2015	V	10.20%
Missouri	Union Electric Co.	ER-2014-0258	4/29/2015	V	9.53%
West Virginia	Appalachian Power Co.	14-1152-E-42-T	5/26/2015	V	9.75%
New York	Central Hudson Gas & Electric	14-E-0318	6/17/2015	D	9.00%
New York	Consolidated Edison Co. of NY	15-E-0050	6/17/2015	D	9.00%
Missouri	Kansas City Power & Light	ER-2014-0370	9/2/2015	V	9.50%

<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.

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

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
<b>Entire Period</b>					
		133			
					9.86%
					9.52%
					9.99%
					9.80%
					8.72%
					10.95%
<b>2012</b>					
		51			
					10.02%
					9.75%
					9.75%
					10.10%
<b>2013</b>					
		38			
					9.83%
					9.37%
					9.56%
					9.97%
<b>2014</b>					
		33			
					9.75%
					9.49%
					9.53%
					9.92%
<b>2015</b>					
		11			
					9.57%
					9.25%
					9.69%

Source: SNL Financial LC, September 9, 2015



**BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE APPLICATION SEEKING</b>	<b>)</b>	
<b>APPROVAL OF OHIO POWER COMPANY'S</b>	<b>)</b>	
<b>PROPOSAL TO ENTER INTO AN AFFILIATE</b>	<b>)</b>	
<b>POWER PURCHASE AGREEMENT</b>	<b>)</b>	<b>CASE NO. 14-1693-EL-RDR</b>
<b>FOR INCLUSION IN THE POWER PURCHASE</b>	<b>)</b>	
<b>AGREEMENT RIDER</b>	<b>)</b>	

<b>IN THE MATTER OF THE APPLICATION OF</b>	<b>)</b>	
<b>OHIO POWER COMPANY FOR APPROVAL OF</b>	<b>)</b>	<b>CASE NO. 14-1694-EL-AAM</b>
<b>CERTAIN ACCOUNTING AUTHORITY</b>	<b>)</b>	

**EXHIBIT SWC-3 OF STEVE W. CHRISS**

**ON BEHALF OF**

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

**Comparison of Returns on Equity Produced by OPC's Proposed Mechanism and the Illinois Statutory Mechanism**

	Moody's BAA Corporate Index, December (1)	ROE, OPC Proposed Formula (2) (1) + 6.5%	Average of 30-Year U.S. Treasury (3)	ROE, IL Formula (4) (3) + 5.8%	Difference Between Moody's and 30-Year U.S. Treasury (5) (1) - (3)	Difference Between OPC ROE and IL ROE (6) (2) - (4)
2010	6.10%	12.60%	4.25%	10.05%	1.85%	2.55%
2011	5.25%	11.75%	3.91%	9.71%	1.34%	2.04%
2012	4.63%	11.13%	2.92%	8.72%	1.71%	2.41%
2013	5.38%	11.88%	3.45%	9.25%	1.93%	2.63%
2014	4.74%	11.24%	3.34%	9.14%	1.40%	2.10%
<b>Average</b>	<b>5.22%</b>	<b>11.72%</b>	<b>3.57%</b>	<b>9.37%</b>	<b>1.65%</b>	<b>2.35%</b>

Sources:

(1) Federal Reserve Bank of St. Louis, Series BAA

(3) Federal Reserve Bank of St. Louis, Series DGS30

**BEFORE THE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE APPLICATION SEEKING</b>	<b>)</b>	
<b>APPROVAL OF OHIO POWER COMPANY'S</b>	<b>)</b>	
<b>PROPOSAL TO ENTER INTO AN AFFILIATE</b>	<b>)</b>	
<b>POWER PURCHASE AGREEMENT</b>	<b>)</b>	<b>CASE NO. 14-1693-EL-RDR</b>
<b>FOR INCLUSION IN THE POWER PURCHASE</b>	<b>)</b>	
<b>AGREEMENT RIDER</b>	<b>)</b>	

<b>IN THE MATTER OF THE APPLICATION OF</b>	<b>)</b>	
<b>OHIO POWER COMPANY FOR APPROVAL OF</b>	<b>)</b>	<b>CASE NO. 14-1694-EL-AAM</b>
<b>CERTAIN ACCOUNTING AUTHORITY</b>	<b>)</b>	

**EXHIBIT SWC-4 OF STEVE W. CHRISS**

**ON BEHALF OF**

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

Title: Moody's Seasoned Baa Corporate Bond Yield©  
 Series ID: BAA  
 Source: Board of Governors of the Federal Reserve System (US)  
 Release: H.15 Selected Interest Rates  
 Seasonal Adjustment: Not Seasonally Adjusted  
 Frequency: Monthly  
 Units: Percent  
 Date Range: 1919-01-01 to 2015-07-01  
 Last Updated: 2015-08-06 2:21 PM CDT  
 Notes: Averages of daily data. Copyright, 2014, Moody's Investor Services.  
 Reprinted with permission. Moody's tries to include bonds with  
 remaining maturities as close as possible to 30 years. Moody's drops  
 bonds if the remaining life falls below 20 years, if the bond is  
 susceptible to redemption, or if the rating changes.

Date	Value	Month	With 650 BP Adder	Apply Cap	Average of Capped
1919-12-01	7.77	12	14.27%	14.27%	13.13%
1920-12-01	8.56	12	15.06%	15.06%	
1921-12-01	7.61	12	14.11%	14.11%	
1922-12-01	7.02	12	13.52%	13.52%	
1923-12-01	7.38	12	13.88%	13.88%	
1924-12-01	6.46	12	12.96%	12.96%	
1925-12-01	6.15	12	12.65%	12.65%	
1926-12-01	5.68	12	12.18%	12.18%	
1927-12-01	5.32	12	11.82%	11.82%	
1928-12-01	5.60	12	12.10%	12.10%	
1929-12-01	5.95	12	12.45%	12.45%	13.13%
1930-12-01	6.71	12	13.21%	13.21%	
1931-12-01	10.42	12	16.92%	15.90%	
1932-12-01	8.42	12	14.92%	14.92%	
1933-12-01	7.75	12	14.25%	14.25%	
1934-12-01	6.23	12	12.73%	12.73%	
1935-12-01	5.30	12	11.80%	11.80%	
1936-12-01	4.53	12	11.03%	11.03%	
1937-12-01	5.73	12	12.23%	12.23%	
1938-12-01	5.27	12	11.77%	11.77%	
1939-12-01	4.92	12	11.42%	11.42%	13.13%
1940-12-01	4.45	12	10.95%	10.95%	
1941-12-01	4.38	12	10.88%	10.88%	
1942-12-01	4.28	12	10.78%	10.78%	
1943-12-01	3.82	12	10.32%	10.32%	
1944-12-01	3.49	12	9.99%	9.99%	
1945-12-01	3.10	12	9.60%	9.60%	
1946-12-01	3.17	12	9.67%	9.67%	
1947-12-01	3.52	12	10.02%	10.02%	

## Wal-Mart Stores East, LP and Sam's East, Inc.

Exhibit SWC-4

Ohio Case Nos. 14-1693-EL-RDR and 14-1694-EL-AAM

Page 2 of 3

1948-12-01	3.53	12	10.03%	10.03%
1949-12-01	3.31	12	9.81%	9.81%
1950-12-01	3.20	12	9.70%	9.70%
1951-12-01	3.61	12	10.11%	10.11%
1952-12-01	3.51	12	10.01%	10.01%
1953-12-01	3.74	12	10.24%	10.24%
1954-12-01	3.45	12	9.95%	9.95%
1955-12-01	3.62	12	10.12%	10.12%
1956-12-01	4.37	12	10.87%	10.87%
1957-12-01	5.03	12	11.53%	11.53%
1958-12-01	4.85	12	11.35%	11.35%
1959-12-01	5.28	12	11.78%	11.78%
1960-12-01	5.10	12	11.60%	11.60%
1961-12-01	5.10	12	11.60%	11.60%
1962-12-01	4.92	12	11.42%	11.42%
1963-12-01	4.85	12	11.35%	11.35%
1964-12-01	4.81	12	11.31%	11.31%
1965-12-01	5.02	12	11.52%	11.52%
1966-12-01	6.18	12	12.68%	12.68%
1967-12-01	6.93	12	13.43%	13.43%
1968-12-01	7.23	12	13.73%	13.73%
1969-12-01	8.65	12	15.15%	15.15%
1970-12-01	9.12	12	15.62%	15.62%
1971-12-01	8.38	12	14.88%	14.88%
1972-12-01	7.93	12	14.43%	14.43%
1973-12-01	8.48	12	14.98%	14.98%
1974-12-01	10.63	12	17.13%	15.90%
1975-12-01	10.56	12	17.06%	15.90%
1976-12-01	9.12	12	15.62%	15.62%
1977-12-01	8.99	12	15.49%	15.49%
1978-12-01	9.94	12	16.44%	15.90%
1979-12-01	12.06	12	18.56%	15.90%
1980-12-01	15.14	12	21.64%	15.90%
1981-12-01	16.55	12	23.05%	15.90%
1982-12-01	14.14	12	20.64%	15.90%
1983-12-01	13.75	12	20.25%	15.90%
1984-12-01	13.40	12	19.90%	15.90%
1985-12-01	11.58	12	18.08%	15.90%
1986-12-01	9.97	12	16.47%	15.90%
1987-12-01	11.29	12	17.79%	15.90%
1988-12-01	10.65	12	17.15%	15.90%
1989-12-01	9.82	12	16.32%	15.90%
1990-12-01	10.43	12	16.93%	15.90%
1991-12-01	9.26	12	15.76%	15.76%
1992-12-01	8.81	12	15.31%	15.31%
1993-12-01	7.69	12	14.19%	14.19%

**Wal-Mart Stores East, LP and Sam's East, Inc.**

**Exhibit SWC-4**

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1994-12-01	9.10	12	15.60%	15.60%
1995-12-01	7.49	12	13.99%	13.99%
1996-12-01	7.89	12	14.39%	14.39%
1997-12-01	7.32	12	13.82%	13.82%
1998-12-01	7.23	12	13.73%	13.73%
1999-12-01	8.19	12	14.69%	14.69%
2000-12-01	8.02	12	14.52%	14.52%
2001-12-01	8.05	12	14.55%	14.55%
2002-12-01	7.45	12	13.95%	13.95%
2003-12-01	6.60	12	13.10%	13.10%
2004-12-01	6.15	12	12.65%	12.65%
2005-12-01	6.32	12	12.82%	12.82%
2006-12-01	6.22	12	12.72%	12.72%
2007-12-01	6.65	12	13.15%	13.15%
2008-12-01	8.43	12	14.93%	14.93%
2009-12-01	6.37	12	12.87%	12.87%
2010-12-01	6.10	12	12.60%	12.60%
2011-12-01	5.25	12	11.75%	11.75%
2012-12-01	4.63	12	11.13%	11.13%
2013-12-01	5.38	12	11.88%	11.88%
2014-12-01	4.74	12	11.24%	11.24%

## 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 11<sup>th</sup> day of September, 2015.

**/s/ Lisa M. Hawrot**

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Lisa M. Hawrot (Ohio Bar ID 0080098)

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Summary: 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.