

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company for an Increase)	Case No. 20-0585-EL-AIR
in Electric Distribution Rates.)	
In the Matter of the Application of)	
Ohio Power Company for Tariff)	Case No. 20-0586-EL-ATA
Approval.)	
In the Matter of the Application of)	
Ohio Power Company for Approval to)	Case No. 20-0587-EL-AAM
Change Accounting Methods.)	

OBJECTIONS TO THE CORRECTED STAFF REPORT OF WALMART INC.

Now comes Walmart Inc. ("Walmart"), by its attorneys, and pursuant to Section 4909.19(C) of the Ohio Revised Code and Rule 4901-1-28 of the Ohio Administrative Code, files its Objections to the November 18, 2020, Staff Report, as superseded and replaced in its entirety by the corrected Staff Report filed on November 25, 2020 ("Staff Report"), filed with the Public Utilities Commission of Ohio ("Commission" or "PUCO") in response to the Application for an Increase in Electric Distribution Rates filed by Ohio Power Company ("OPCo" or "Company") on June 8, 2020 ("Application") and states as follows:

I. INTRODUCTION

On April 29, 2020, OPCo filed a notice of intent to file an Application with the Commission, and subsequently filed its Application on June 8, 2020. As required by statute, Commission Staff ("Staff") examined the Application and then issued the Staff Report on November 18, 2020, which was later corrected, superseded, and replaced by the Staff Report filed on November 25, 2020. Among other things, the Staff Report made the following recommendations and/or proposed revisions to the Company's Application:

- Revenue Requirement: Staff proposes an increase in OPCo's distribution base revenues in the range of \$237.2 million to \$257.7 million as compared to the Company's requested distribution base revenue increase of \$402.1 million.¹ After removing the revenue impact changes in riders resulting from rolling these amounts into base rates, Staff's recommendation results in a net *decrease* in the Company's overall revenue recovery in the range of \$122.6 million to \$102.1 million as compared to the net increase of \$42.3 million proposed by the Company.² Prior to any adjustment for rider changes, Staff's recommended distribution base revenue increase represents an increase in base revenues of approximately 37.1 percent.³ As adjusted, Staff's recommendations would result in an overall decrease in rates of approximately 9.1 percent.⁴
- Return on Equity ("ROE"): Staff's analysis produces a cost of equity range of 8.62 percent to 9.62 percent, to which Staff makes an upward adjustment to allow for issuance and other costs.⁵ After the adjustment, Staff's recommended ROE range is 8.76 percent to 9.78 percent.⁶ Applied to Staff's assumed capital structure of 45.57 percent debt and 54.43 percent equity, Staff recommends a weighted average cost of capital in the range of 7.15 percent to 7.70 percent.⁷ The Company's requested ROE in this proceeding is 10.15 percent.⁸

¹ See Staff Report, p. 38.

² See *id.*

³ See *id.*, p. 39, Table 6: Base Revenue Distribution and Increase Staff Proposed.

⁴ See *id.*, p. 39, Table 8: Total Revenue Distribution and Increase Staff Proposed.

⁵ See *id.*, p. 26.

⁶ See *id.*

⁷ See Staff Report, p. 24.

⁸ See Application, p. 5.

- ROE Inclusion Costs: As stated above, Staff made an upward adjustment for certain costs by applying an adjustment factor of 1.01677 to its ROE range. As set forth in Schedule D-1.2 to the Staff Report, this adjustment factor includes what Staff has labeled as "Generic Issuance Cost," which is listed as 3.50 percent.⁹
- Consolidation of Tariffs: The Company in its Application and related filings is seeking to consolidate rate zones under Ohio Power Company and Columbus Southern Power in order to provide a more simplified rate schedule for customers.¹⁰ This consolidation will include combining various general service ("GS") customers into five GS rate schedules: (i) GS – Unmetered Service Provision, (ii) GS – Secondary, (iii) GS – Primary, (iv) GS – Transmission, and (v) Recreational Lighting Provision. As proposed, Walmart would likely take service under the proposed GS – Secondary rate schedule. Staff does not appear to oppose the Company's consolidation of rate schedules in concept, but it does make certain recommendations to the Company's proposed rate design for the consolidated rates.
- Proposed Changes to Rate Design: Under the proposed GS – Secondary and GS – Primary rate schedules, both the Company and Staff introduce an energy charge for the first 4,500 kWh.¹¹ This is inconsistent with and a departure from the rate schedules under which these customers currently receive service.

⁹ See Staff Report, p. 134, Schedule D-1.2: Equity Issuance Cost Adjustment.

¹⁰ See *id.*, p. 41.

¹¹ See Staff Report, p. 45 and p. 46, Table 16: Schedule GS – Secondary and Table 17: Schedule GS – Primary.

II. OBJECTIONS

A. Staff's Recommended ROE Should Reflect Recent National ROE Trends.

Walmart objects to Staff's upward adjustment in its proposed ROE range of 8.76 percent to 9.78 percent to account for issuance costs. Not only does the upward adjustment unnecessarily inflate the ROE needed by the Company to attract capital, but it is inconsistent with national ROE awards that have considered the issue of issuance costs. Except for the inclusion of issuance costs, Walmart does not generally oppose the ROE range proposed by Staff and supports Staff's rejection of the Company's proposed ROE of 10.15 percent. According to data from SNL Financial, a part of Regulatory Research Associates, the national average ROE awarded by regulatory authorities from 2017 to 2020 is 9.57 percent.¹² During this same time frame, the national average ROE for distribution-only utilities and rate cases limited to distribution-only rates is even lower at 9.31 percent.¹³ Walmart supports an ROE no higher than the national average of 9.31 percent awarded to distribution-only utilities, which is within the range proposed by Staff.

B. The Company's and Staff's Use of an Energy Charge for Distribution-Related Costs Violates Sound Ratemaking Principles.

In general, Walmart supports the Company's efforts to consolidate rate schedules and simplify customer bills; however, Walmart opposes certain rate design elements for the proposed GS – Secondary and GS – Primary rate schedules. In particular, Walmart objects to Staff's support for the Company's proposal to bill the first 4,500 kWh of usage to customers who take service under the GS – Secondary and GS – Primary rate schedules through an energy charge; *i.e.*, on a \$/kWh basis.

¹² See Appendix A, Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present.

¹³ See *id.*

As summarized in Table 16 to the Staff Report, customers who currently receive distribution service under the rate schedule(s) for rate classes that the Company proposes to consolidate into the GS – Secondary and GS – Primary rate schedules are presently being billed for distribution system costs only through a customer charge and a demand charge.¹⁴ There is no energy charge for these customers. It is appropriate -- and consistent with cost-causation principles and sound rate-design -- to bill distribution system costs through a demand charge; costs incurred to invest in, operate, and maintain the Company's distribution system do not vary with the amount of energy that is consumed by customers. Misaligning the collection of fixed costs through a variable rate as proposed by the Company and supported by Staff is not only poor rate design, but can result in intraclass subsidies due to higher load factor customers paying for a disproportionate share of demand-related costs when compared to lower load factor customers within the class.

CONCLUSION

Walmart reserves the right to supplement or modify these Objections in the event that Staff makes additional findings, conclusions, or recommendations with respect to the Staff Report. Walmart also reserves the right to respond to objections or other issues (either in support or opposition) raised by other parties in the proceeding.

¹⁴ See Staff Report, p. 46, Table 16: Schedule GS – Secondary.

Respectfully submitted,

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Dated: December 18, 2020

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(11)	(12)	(13)	(14)
								(8) - (5)				(8) x (13)
Wyoming	MDU Resources Group Inc.	MDU	2004-117-ER-16	10.10%	1/18/2017	V	9.45%	(65)	Settled	7.25%	50.99%	4.82%
New York	Consolidated Edison Co. of NY	ED	16-E-0060	9.75%	1/24/2017	D	9.00%	(75)	Settled	6.82%	48.00%	4.32%
Michigan	DTE Electric Co.	DTE	U-18014	10.50%	1/31/2017	V	10.10%	(40)	Fully Litigated	5.55%	37.49%	3.79%
Maryland	Delmarva Power & Light Co.	EXC	9424	10.60%	2/15/2017	D	9.60%	(100)	Fully Litigated	6.74%	49.10%	4.71%
New Jersey	Rockland Electric Company	ED	ER-16050428	10.20%	2/22/2017	D	9.60%	(60)	Settled	7.47%	49.70%	4.77%
Arizona	Tucson Electric Power Co.	FTS	E-01933A-15-0322	10.35%	2/24/2017	V	9.75%	(60)	Settled	7.04%	50.03%	4.88%
Michigan	Consumers Energy Co.	CMS	U-17990	10.70%	2/28/2017	V	10.10%	(60)	Fully Litigated	5.94%	40.75%	4.12%
Minnesota	Otter Tail Power Co.	OTTR	E-017/GR-15-1033	10.05%	3/2/2017	V	9.41%	(64)	Fully Litigated	7.51%	52.50%	4.94%
Oklahoma	Oklahoma Gas & Electric Co.	OGE	PUD 201500273	10.25%	3/20/2017	V	9.50%	(75)	Fully Litigated	7.69%	53.31%	5.06%
Florida	Gulf Power Co.	NEE	160186-EI	11.00%	4/4/2017	V	10.25%	(75)	Settled	N/A	N/A	N/A
New Hampshire	Liberty Utilities Granite St	AQN	DE-16-383	10.30%	4/12/2017	D	9.40%	(90)	Settled	7.64%	50.00%	4.70%
New Hampshire	Unitil Energy Systems Inc.	UTL	DE-16-384	10.30%	4/20/2017	D	9.50%	(80)	Settled	8.34%	50.97%	4.84%
Missouri	Kansas City Power & Light	EVRG	ER-2016-0285	9.90%	5/3/2017	V	9.50%	(40)	Fully Litigated	7.43%	49.20%	4.67%
Minnesota	Northern States Power Co.	XEL	E-022/GR-15-826	10.00%	5/11/2017	V	9.20%	(80)	Settled	7.08%	52.50%	4.83%
Arkansas	Oklahoma Gas & Electric Co.	OGE	16-052-U	10.25%	5/18/2017	V	9.50%	(75)	Settled	5.42%	36.38%	3.46%
Delaware	Delmarva Power & Light Co.	EXC	16-0649	10.60%	5/23/2017	D	9.70%	(90)	Settled	N/A	N/A	N/A
North Dakota	MDU Resources Group Inc.	MDU	PU-16-666	10.00%	6/16/2017	V	9.65%	(35)	Settled	7.36%	51.40%	4.96%
Kentucky	Kentucky Utilities Co.	PPL	2016-00370	10.23%	6/22/2017	V	9.70%	(53)	Settled	N/A	N/A	N/A
Kentucky	Louisville Gas & Electric Co.	PPL	2016-00371	10.23%	6/22/2017	V	9.70%	(53)	Settled	N/A	N/A	N/A
District of Columbia	Potomac Electric Power Co.	EXC	FC-1139	10.60%	7/24/2017	D	9.50%	(110)	Fully Litigated	7.46%	49.14%	4.67%
Arizona	Arizona Public Service Co.	PNW	E-01345A-16-0036	10.50%	8/15/2017	V	10.00%	(50)	Settled	7.85%	55.80%	5.58%
New Jersey	Atlantic City Electric Co.	EXC	ER-17030308	10.10%	9/22/2017	D	9.60%	(50)	Settled	7.60%	50.47%	4.85%
Texas	Oncor Electric Delivery Co.	SRE	46957	10.25%	9/28/2017	D	9.80%	(45)	Settled	7.44%	42.50%	4.17%
Maryland	Potomac Electric Power Co.	EXC	9443	10.10%	10/20/2017	D	9.50%	(60)	Fully Litigated	7.43%	50.15%	4.76%
California	Pacific Gas & Electric Co.	PCG	Advice No. 5148-E	10.25%	10/26/2017	V	10.25%	-	Settled	7.69%	52.00%	5.33%
California	San Diego Gas & Electric Co.	SRE	Advice No. 3120-E	10.20%	10/26/2017	V	10.20%	-	Settled	7.55%	52.00%	5.30%
California	Southern California Edison Co.	EIX	Advice No. 3665-E	10.30%	10/26/2017	V	10.30%	-	Settled	7.61%	48.00%	4.94%
Florida	Tampa Electric Co.	EMA	20170210-EI	N/A ^Ω	11/6/2017	V	10.25%	N/A	Settled	N/A	N/A	N/A
Alaska	Alaska Electric Light Power	AVA	U-16-086	13.80%	11/15/2017	V	11.95%	(185)	Settled	8.91%	58.18%	6.95%
Massachusetts	NSTAR Electric Co.	ES	17-05	10.50%	11/30/2017	D	10.00%	(50)	Fully Litigated	7.33%	53.34%	5.33%
Massachusetts	Western Massachusetts Electric	ES	17-05	10.50%	11/30/2017	D	10.00%	(50)	Fully Litigated	7.26%	54.51%	5.45%
Washington	Puget Sound Energy Inc.		UE-170033	9.80%	12/5/2017	V	9.50%	(30)	Settled	7.60%	48.50%	4.61%
Illinois	Ameren Illinois	AEE	17-0197	8.40%	12/6/2017	D	8.40%	-	Fully Litigated	7.04%	50.00%	4.20%
Illinois	Commonwealth Edison Co.	EXC	17-0196	8.40%	12/6/2017	D	8.40%	-	Fully Litigated	6.47%	45.89%	3.85%
Wisconsin	Northern States Power Co. - WI	XEL	4220-UR-123	10.00%	12/7/2017	V	9.80%	(20)	Fully Litigated	7.56%	51.45%	5.04%
Texas	El Paso Electric Co.	EE	46831	10.50%	12/14/2017	V	9.65%	(85)	Settled	7.73%	48.35%	4.67%
Texas	Southwestern Electric Power Co.	AEP	46449	10.00%	12/14/2017	V	9.60%	(40)	Fully Litigated	7.18%	48.46%	4.65%
Oregon	Portland General Electric Co.	POR	UE 319	9.75%	12/18/2017	V	9.50%	(25)	Settled	7.35%	50.00%	4.75%
New Mexico	Public Service Co. of NM	PNM	16-00276-UT	10.13%	12/20/2017	V	9.58%	(55)	Settled	7.23%	49.61%	4.75%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(11)	(12)	(13)	(14) (8) x (13)
Vermont	Green Mountain Power Corp		17-3112-INV	9.50%	12/21/2017	V	9.10%	(40)	Settled	6.87%	48.60%	4.42%
Idaho	Avista Corp.	AVA	AVU-E-17-01	9.90%	12/28/2017	V	9.50%	(40)	Settled	7.61%	50.00%	4.75%
Nevada	Nevada Power Co.	BRK.A	17-06003	10.10%	12/29/2017	V	9.50%	(60)	Fully Litigated	8.00%	49.99%	4.75%
Kentucky	Kentucky Power Co.	AEP	2017-00179	10.31%	1/18/2018	V	9.70%	(61)	Settled	6.44%	41.68%	4.04%
Oklahoma	Public Service Co. of OK	AEP	PUD 201700151	10.00%	1/31/2018	V	9.30%	(70)	Fully Litigated	6.88%	48.51%	4.51%
Iowa	Interstate Power & Light Co.	LNT	RPV-2017-0001	10.57%	2/2/2018	V	9.98%	(59)	Settled	7.49%	49.02%	4.89%
North Carolina	Duke Energy Progress Inc.	DUK	E-2, Sub 1142	10.75%	2/23/2018	V	9.90%	(85)	Settled	7.09%	52.00%	5.15%
Minnesota	ALLETE (Minnesota Power)	ALE	E-015/GR-16-664	10.15%	3/12/2018	V	9.25%	(90)	Fully Litigated	7.06%	53.81%	4.98%
New York	Niagara Mohawk Power Corp.	NG	17-E-0238	9.79%	3/15/2018	D	9.00%	(79)	Settled	6.53%	48.00%	4.32%
Michigan	Consumers Energy Co.	CMS	U-18322	10.50%	3/29/2018	V	10.00%	(50)	Fully Litigated	5.89%	40.89%	4.09%
Michigan	Indiana Michigan Power Co.	AEP	U-18370	10.60%	4/12/2018	V	9.90%	(70)	Fully Litigated	5.76%	36.38%	3.60%
Kentucky	Duke Energy Kentucky Inc.	DUK	2017-00321	10.30%	4/13/2018	V	9.73%	(57)	Fully Litigated	6.83%	49.25%	4.79%
Connecticut	Connecticut Light and Power	ES	17-10-46	10.50%	4/18/2018	D	9.25%	(125)	Settled	7.09%	53.00%	4.90%
Michigan	DTE Electric Co.	DTE	U-18255	10.50%	4/18/2018	V	10.00%	(50)	Fully Litigated	5.34%	36.84%	3.68%
Washington	Avista Corp.	AVA	UE-170485	9.90%	4/26/2018	V	9.50%	(40)	Fully Litigated	7.50%	48.50%	4.61%
Indiana	Indiana Michigan Power Co.	AEP	44967	10.60%	5/30/2018	V	9.95%	(65)	Settled	5.51%	35.73%	3.56%
Maryland	Potomac Electric Power Co.	EXC	9472	10.10%	5/31/2018	D	9.50%	(60)	Settled	7.03%	50.44%	4.79%
New York	Central Hudson Gas & Electric	FTS	17-E-0459	9.50%	6/14/2018	D	8.80%	(70)	Settled	6.44%	48.00%	4.22%
Hawaii	Hawaiian Electric Co.	HE	2016-0328	10.60%	6/22/2018	V	9.50%	(110)	Settled	7.57%	57.10%	5.42%
North Carolina	Duke Energy Carolinas LLC	DUK	E-7, Sub 1146	10.75% †	6/22/2018	V	9.90%	(85)	Settled	7.35%	52.00%	5.15%
Maine	Versant Power		2017-00198	9.50%	6/28/2018	D	9.35%	(15)	Fully Litigated	7.18%	49.00%	4.58%
Hawaii	Hawaii Electric Light Co	HE	2015-0170	10.60%	6/29/2018	V	9.50%	(110)	Settled	7.80%	56.69%	5.39%
District of Columbia	Potomac Electric Power Co.	EXC	FC-1150	10.10%	8/8/2018	D	9.53%	(57)	Settled	7.45%	50.44%	4.81%
Delaware	Delmarva Power & Light Co.	EXC	17-0977	10.10%	8/21/2018	D	9.70%	(40)	Settled	6.78%	50.52%	4.90%
Rhode Island	Narragansett Electric Co.	NG	4770 (electric)	10.10%	8/24/2018	D	9.28%	(82)	Settled	6.97%	50.95%	4.73%
New Mexico	Southwestern Public Service Co	XEL	17-00255-UT	10.25%	9/5/2018	V	9.10%	(115)	Fully Litigated	7.24%	53.97%	4.91%
Wisconsin	Wisconsin Power and Light Co	LNT	6680-UR-121 (Elec)	10.00%	9/14/2018	V	10.00%	-	Settled	7.08%	52.00%	5.20%
Wisconsin	Madison Gas and Electric Co.	MGEE	3270-UR-122 (Elec)	9.80%	9/20/2018	V	9.80%	-	Settled	7.10%	56.06%	5.49%
North Dakota	Otter Tail Power Co.	OTTR	PU-17-398	10.30%	9/26/2018	V	9.77%	(53)	Settled	7.64%	52.50%	5.13%
Ohio	Dayton Power and Light Co.	AES	15-1830-EL-AIR	10.50%	9/26/2018	D	9.999% *	(50)	Settled	7.27%	47.52%	4.75%
Kansas	Westar Energy Inc.	EVRG	18-WSEE-328-RTS	9.85%	9/27/2018	V	9.30%	(55)	Settled	7.06%	51.24%	4.77%
Pennsylvania	UGI Utilities Inc.	UGI	R-2017-2640058	11.25%	10/4/2018	D	9.85%	(140)	Fully Litigated	7.48%	54.02%	5.32%
New Jersey	Public Service Electric Gas	PEG	ER18010029	10.30%	10/29/2018	D	9.60%	(70)	Settled	6.99%	54.00%	5.18%
Indiana	Indianapolis Power & Light Co.	AES	45029	10.32%	10/31/2018	V	9.99%	(33)	Settled	6.59%	39.67%	3.96%
Illinois	Ameren Illinois	AEE	18-0807	8.69%	11/1/2018	D	8.69%	-	Fully Litigated	6.99%	50.00%	4.35%
Illinois	Commonwealth Edison Co.	EXC	18-0808	8.69%	12/4/2018	D	8.69%	-	Fully Litigated	6.52%	47.11%	4.09%
Kansas	Kansas City Power & Light	EVRG	18-KCPE-480-RTS	9.85%	12/13/2018	V	9.30%	(55)	Settled	7.07%	49.09%	4.57%
Oregon	Portland General Electric Co.	POR	UE-335	9.50%	12/14/2018	V	9.50%	-	Settled	7.30%	50.00%	4.75%
Ohio	Duke Energy Ohio Inc.	DUK	17-0032-EL-AIR	10.40%	12/19/2018	D	9.84%	(56)	Settled	7.54%	50.75%	4.99%

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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(11)	(12)	(13)	(14) (8) x (13)
Texas	Texas-New Mexico Power Co.	PNM	48401	10.50%	12/20/2018	D	9.65%	(85)	Settled	7.89%	45.00%	4.34%
Vermont	Green Mountain Power Corp.		18-0974-TF	9.30%	12/21/2018	D	9.30%	-	Fully Litigated	5.26%	49.85%	4.64%
Michigan	Consumers Energy Co.	CMS	U-20134	10.75%	1/9/2019	V	10.00%	(75)	Settled	N/A	N/A	N/A
West Virginia	Appalachian Power Co.	AEP	18-0646-E-42T	10.22%	2/27/2019	V	9.75%	(47)	Settled	7.28%	50.16%	4.89%
New Jersey	Atlantic City Electric Co.	EXC	ER18080925	10.10%	3/13/2019	D	9.60%	(50)	Settled	7.08%	49.94%	4.79%
New York	Orange & Rockland Utilities Inc.	ED	18-E-0067	9.75%	3/14/2019	D	9.00%	(75)	Settled	6.97%	48.00%	4.32%
Oklahoma	Public Service Company of OK	AEP	PUD201800097	10.30%	3/14/2019	V	9.40%	(90)	Settled	6.97%	N/A	N/A
Maryland	Potomac Edison Co.	FE	9490	10.80%	3/22/2019	D	9.65%	(115)	Fully Litigated	7.15%	52.82%	5.10%
Kentucky	Kentucky Utilities Co.	PPL	2018-00294	10.42%	4/30/2019	V	9.73%	(69)	Settled	N/A	N/A	N/A
Kentucky	Louisville Gas & Electric Co.	PPL	2018-00295	10.42%	4/30/2019	V	9.73%	(69)	Settled	N/A	N/A	N/A
South Carolina	Duke Energy Carolinas LLC	DUL	2018-319-E	10.50%	5/1/2019	V	9.50%	(100)	Fully Litigated	7.16%	53.00%	5.04%
Michigan	DTE Electric Co.	DTE	U-20162	10.50%	5/2/2019	V	10.00%	(50)	Fully Litigated	5.48%	37.94%	3.79%
South Carolina	Duke Energy Progress LLC	DUK	2018-318-E	10.50%	5/8/2019	V	9.50%	(100)	Fully Litigated	6.99%	53.00%	5.04%
South Dakota	Otter Tail Power Co.	OTTR	EL18-021	10.30%	5/14/2019	V	8.75%	(155)	Fully Litigated	7.09%	52.92%	4.63%
Hawaii	Maui Electric Company Ltd	HE	2017-0150	10.60%	5/16/2019	V	9.50%	(110)	Settled	7.43%	57.02%	5.42%
Michigan	Upper Peninsula Power Co.		U-20276	10.50%	5/23/2019	V	9.90%	(60)	Settled	6.91%	N/A	N/A
Maryland	Potomac Electric Power Co.	EXC	9602	10.30%	8/12/2019	D	9.60%	(70)	Fully Litigated	7.45%	50.46%	4.84%
Vermont	Green Mountain Power Corp.		19-1932-TF	9.16%	8/29/2019	V	9.06%	(10)	Fully Litigated	6.85%	49.46%	4.48%
Wisconsin	Northern States Power Co - WI	XEL	4220-UR-124	N/A	9/4/2019	V	10.00%	N/A	Settled	7.74%	52.52%	5.25%
Massachusetts	Massachusetts Electric Co.	NG	DPU-18-150	10.50%	9/30/2019	D	9.60%	(90)	Fully Litigated	7.56%	53.49%	5.14%
Montana	Northwestern Corp.	NWE	D2018.2.12	10.65%	10/29/2019	V	9.65%	(100)	Settled	6.92%	49.38%	4.77%
Wisconsin	Wisconsin Electric Power Co.	WEC	05-UR-109	10.35%	10/31/2019	V	10.00%	(35)	Settled	7.49%	54.46%	5.45%
Wisconsin	Wisconsin Public Service Corp.	WEC	6690-UR-126	10.35%	10/31/2019	V	10.00%	(35)	Settled	7.22%	51.96%	5.20%
Louisiana	Entergy New Orleans LLC	ETR	UD-18-07	10.50%	11/7/2019	V	9.35%	(115)	Fully Litigated	7.09%	50.00%	4.68%
Idaho	Avista Corp.	AVA	AVU-E-19-04	9.90%	11/29/2019	V	9.50%	(40)	Settled	7.35%	50.00%	4.75%
Illinois	Commonwealth Edison Co.	EXC	19-0387	8.91%	12/4/2019	D	8.91%	-	Fully Litigated	6.51%	47.97%	4.27%
Indiana	Northern Indiana Public Service Co.	NI	45159	10.80%	12/4/2019	V	9.75%	(105)	Settled	6.52%	47.86%	4.67%
Illinois	Ameren Illinois	AEE	19-0436	8.91%	12/16/2019	D	8.91%	-	Fully Litigated	6.71%	50.00%	4.46%
Georgia	Georgia Power Co.	SO	42516	10.90%	12/17/2019	V	10.50%	(40)	Fully Litigated	N/A	56.00%	5.88%
Maryland	Baltimore Gas and Electric Co.	EXC	9610	10.30%	12/17/2019	D	9.70%	(60)	Settled	6.94%	N/A	N/A
California	Pacific Gas & Electric Co.	PCG	A-19-04-015	12.00%	12/19/2019	V	10.25%	(175)	Fully Litigated	7.81%	52.00%	5.33%
California	San Diego Gas & Electric Co.	SRE	A-19-04-017	12.38%	12/19/2019	V	10.20%	(218)	Fully Litigated	7.55%	52.00%	5.30%
California	Southern California Edison Co.	EIX	A-19-04-014	11.45%	12/19/2019	V	10.30%	(115)	Fully Litigated	7.68%	52.00%	5.36%
Arkansas	Southwestern Electric Power Co.	AEP	19-008-U	10.50%	12/20/2019	V	9.45%	(105)	Settled	4.93%	33.71%	3.19%
Nevada	Sierra Pacific Power Co.	BRK.A	19-06002	10.21%	12/24/2019	V	9.50%	(71)	Settled	6.75%	50.92%	4.84%
Iowa	Interstate Power & Light Co.	LNT	RPU-2019-0001	10.25%	1/8/2020	V	10.02%	(23)	Settled	7.23%	51.00%	5.11%
New York	Consolidated Edison Co. of NY	ED	19-E-0065	9.75%	1/16/2020	D	8.80%	(95)	Settled	6.61%	48.00%	4.22%
New Jersey	Rockland Electric Company	ED	ER19050552	9.60%	1/22/2020	D	9.50%	(10)	Settled	7.11%	48.32%	4.59%
Michigan	Indiana Michigan Power Co.	AEP	U-20359	10.50%	1/23/2020	V	9.86%	(64)	Settled	6.08%	46.56%	4.59%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(11)	(12)	(13)	(14) (8) x (13)
California	PacifiCorp	BRK.A	A-18-04-002	10.60%	2/6/2020	V	10.00%	(60)	Fully Litigated	N/A	51.96%	5.20%
Colorado	Public Service Company of Colorado	XEL	19AL-0268E	10.20%	2/11/2020	V	9.30%	(90)	Fully Litigated	6.97%	55.61%	5.17%
Texas	Centerpoint Energy	CNP	49421	10.40%	2/14/2020	D	9.40%	(100)	Settled	6.51%	42.50%	4.00%
Maine	Central Maine Power Co.	IBE	2018-00194	10.00%	2/19/2020	D	8.25%	(175)	Fully Litigated	6.30%	50.00%	4.13%
North Carolina	Virginia Electric & Power Co.	D	E-22 Sub 562	10.75%	2/24/2020	V	9.75%	(100)	Settled	7.20%	52.00%	5.07%
Texas	AEP Texas Inc.	AEP	49494	10.50%	2/27/2020	D	9.40%	(110)	Settled	6.45%	42.50%	4.00%
Indiana	Indiana Michigan Power Co.	AEP	45235	10.50%	3/11/2020	V	9.70%	(80)	Fully Litigated	5.61%	37.55%	3.64%
Washington	Avista Corp.	AVA	UE-190334	9.90%	3/25/2020	V	9.40%	(50)	Settled	7.21%	48.50%	4.56%
Massachusetts	Fitchburg Gas & Electric Light	UTL	DPU 19-130	10.50%	4/17/2020	D	9.70%	(80)	Settled	7.99%	52.45%	5.09%
Kentucky	Duke Energy Kentucky Inc.	DUK	2019-00271	9.80%	4/27/2020	V	9.25%	(55)	Fully Litigated	6.41%	48.23%	4.46%
Michigan	DTE Electric Co.	DTE	U-20561	10.50%	5/8/2020	V	9.90%	(60)	Fully Litigated	5.46%	38.32%	3.79%
New Mexico	Southwestern Public Service Co	XEL	19-00170-UT	10.10%	5/20/2020	V	9.45%	(65)	Settled	7.19%	54.77%	5.18%
Indiana	Duke Energy Indiana, LLC	DUK	45253	10.40%	6/29/2020	V	9.70%	(70)	Fully Litigated	5.71%	40.98%	3.98%
New Hampshire	Liberty Utilities Granite St	AQN	DE-19-064	10.00%	6/30/2020	D	9.10%	(90)	Settled	7.60%	52.00%	4.73%
Washington	Puget Sound Energy Inc.		UE-190529	9.50%	7/8/2020	V	9.40%	(10)	Fully Litigated	7.39%	48.50%	4.56%
Maryland	Delmarva Power & Light Co.	EXC	9630	10.30%	7/14/2020	D	9.60%	(70)	Fully Litigated	6.84%	50.53%	4.85%
Hawaii	Hawaii Electric Light Co	HE	2018-0368	10.50%	7/28/2020	V	9.50%	(100)	Settled	7.52%	56.83%	5.40%
California	Liberty Utilities (CalPeco Electric)	AQN	A-18-12-001	10.30%	8/27/2020	V	10.00%	(30)	Fully Litigated	7.63%	52.50%	5.25%
Vermont	Green Mountain Power Corp.		20-1407-TF	8.20%	8/27/2020	V	8.20%	-	Fully Litigated	6.43%	49.87%	4.09%
Hawaii	Hawaiian Electric Co.	HE	2019-0085	10.50%	10/22/2020	V	9.50%	(100)	Settled	7.37%	56.83%	5.40%
New Jersey	Jersey Central Power & Light Co.	FE	ER20020146	10.15%	10/28/2020	D	9.60%	(55)	Settled	7.40%	51.44%	4.94%
New York	Rochester Gas & Electric Corp.	IBE	C-19-E-0380	9.50%	11/19/2020	D	8.80%	(70)	Settled	6.62%	48.00%	4.22%
New York	NY State Electric & Gas Corp.	IBE	C-19-E-0378	9.50%	11/19/2020	D	8.80%	(70)	Settled	6.10%	48.00%	4.22%
Wisconsin	Madison Gas and Electric Co.	MGEE	D-3270-UR-123 (Elec)	9.80%	11/24/2020	V	9.80%	-	Settled	6.95%	55.00%	5.39%
Illinois	Ameren Illinois	AEE	D-20-0381	8.38%	12/9/2020	D	8.38%	-	Fully Litigated	6.39%	50.00%	4.19%
Illinois	Commonwealth Edison Co.	EXC	D-20-0393	8.38%	12/9/2020	D	8.38%	-	Fully Litigated	6.28%	48.16%	4.04%

Entire Period

# of Decisions		143										
Average	(All Utilities)			10.19%			9.57%	(63)		7.02%	49.44%	4.72%
Average	(Distribution Only)			9.93%			9.31%	(62)		7.02%	49.53%	4.61%
Average	(Vertically Integrated Only)			10.34%			9.71%	(63)		7.01%	49.39%	4.79%
Median	(All Utilities)			10.30%			9.60%			7.10%	50.00%	4.76%
Maximum	(All Utilities)			13.80%			11.95%			8.91%	58.18%	6.95%
Minimum	(All Utilities)			8.20%			8.20%			4.93%	33.71%	3.19%
Settled				10.26%			9.64%	(63)		7.14%	49.84%	4.79%
Fully Litigated				10.09%			9.46%	(63)		6.83%	48.91%	4.62%

2017

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2017 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(11)	(12)	(13)	(14) (8) x (13)
# of Decisions				42								
Average	(All Utilities)			10.22%			9.68%	(54)		7.30%	49.44%	4.77%
Average	(Distribution Only)			10.04%			9.43%	(61)		7.31%	49.52%	4.66%
Average	(Distribution Only, exc. IL FRP)			10.32%			9.60%	(72)		7.41%	49.81%	4.78%
Average	(Vertically Integrated Only)			10.31%			9.80%	(50)		7.29%	49.40%	4.83%
2018												
# of Decisions				38								
Average	(All Utilities)			10.14%			9.55%	(59)		6.92%	48.99%	4.67%
Average	(Distribution Only)			9.96%			9.38%	(58)		6.96%	49.91%	4.68%
Average	(Distribution Only, exc. IL FRP)			10.14%			9.47%	(66)		6.99%	50.11%	4.75%
Average	(Vertically Integrated Only)			10.27%			9.68%	(60)		6.89%	48.32%	4.67%
2019												
# of Decisions				33								
Average	(All Utilities)			10.43%			9.64%	(79)		7.02%	50.33%	4.85%
Average	(Distribution Only)			9.95%			9.37%	(58)		7.05%	50.38%	4.70%
Average	(Distribution Only, exc. IL FRP)			10.29%			9.53%	(77)		7.19%	50.94%	4.84%
Average	(Vertically Integrated Only)			10.59%			9.73%	(86)		7.01%	50.32%	4.90%
2020												
# of Decisions				30								
Average	(All Utilities)			9.98%			9.35%	(63)		6.78%	49.23%	4.60%
Average	(Distribution Only)			9.77%			9.05%	(71)		6.78%	48.61%	4.40%
Average	(Distribution Only, exc. IL FRP)			9.89%			9.07%	(83)		6.86%	47.99%	4.35%
Average	(Vertically Integrated Only)			10.14%			9.57%	(56)		6.77%	49.71%	4.75%

Source: S&P Global Market Intelligence

Last Updated: 12/15/2020

* Due to Rounding, the ROE Award is reported as 10.00 on the S&P Global Website.

‡ S&P incorrectly reports this value as 9.9%

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

¥ Weighted to include ratemaking-principles rate base and ROE

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objections to the Corrected Staff Report of Walmart Inc. was served by electronic mail, upon the following Parties of Record on this 18th day of December, 2020.

/s/ Carrie H. Grundmann

Carrie H. Grundmann (Ohio Bar ID 96138)

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in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Objection Objections to the Corrected Staff Report of Walmart Inc. electronically filed by Carrie H Grundmann on behalf of Walmart Inc.