

FILE

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company for Authority to)	
Establish a Standard Service Offer Pursuant)	Case No. 11-346-EL-SSO
to Section 4928.143, Revised Code, in the)	Case No. 11-348-EL-SSO
Form of an Electric Security Plan.)	
)	
In the Matter of the Application of)	
Columbus Southern Power Company and)	Case No. 11-349-EL-AAM
Ohio Power Company for Approval of)	Case No. 11-350-EL-AAM
Certain Accounting Authority.)	

DIRECT TESTIMONY OF

STEVE W. CHRISS

ON BEHALF OF

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

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Dated: May 4, 2012

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

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

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

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

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

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

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

3 A. Yes. I previously submitted testimony in the instant docket on July 25,
4 2011. I have also testified in case 10-2586-EL-SSO.

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

7 A. Yes. I have submitted testimony in over 60 proceedings before 30 other
8 utility regulatory commissions. My testimony has addressed topics
9 including cost of service and rate design, ratemaking policy, qualifying
10 facility rates, telecommunications deregulation, resource certification,
11 energy efficiency/demand side management, fuel cost adjustment
12 mechanisms, decoupling, and the collection of cash earnings on
13 construction work in progress.

14 **Q. HAVE YOU PREPARED EXHIBITS?**

15 A. Yes, I have prepared Exhibit SWC-1, consisting of eight pages.

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

17 A. The purpose of my testimony is to address issues related to the standard
18 service offer ("SSO") through an electric security plan ("ESP") proposed in
19 the application of Columbus Southern Power Company and Ohio Power
20 Company ("AEP Ohio" or "the Company"). Specifically, I respond to the
21 testimonies of William A. Allen, Renee V. Hawkins, Philip J. Nelson, and
22 David M. Roush.

1 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

2 **A. My recommendations are as follows:**

- 3 1. Generally, it is appropriate for any generation-related riders to be
4 bypassable by customers who take competitive supply service. The
5 price paid to the supplier by customers taking competitive supply
6 includes the cost of power and the cost of procurement for that power,
7 compliance costs, and other underlying operating costs. Charging
8 competitively supplied customers for any part of AEP-Ohio's
9 generation-related costs misaligns cost causation and cost
10 responsibility, results in inequitable rates as those customers will pay a
11 cost for which they will receive no benefit, and can result in double
12 payment of costs, such as compliance costs, that are incurred by AEP-
13 Ohio to serve their SSO customers and likewise incurred by
14 competitive suppliers to serve their respective customers. Additionally,
15 this cost misalignment moves generation rates for the Company's SSO
16 customers and competitively supplied customers away from the
17 respective cost of service for each, and does not provide for rates that
18 reflect cost causation, send proper price signals, and minimize price
19 distortions.
- 20 2. If the Commission approves a Generation Resource Rider ("GRR"), it
21 should determine that the rider be bypassable by customers who take
22 competitive supply service.

1 3. If the Commission approves a Retail Stability Rider ("RSR"):

2 a. The ROE used to calculate the revenue requirement should be
3 no higher than 10.2 percent.

4 b. The annual revenue requirement should be based on the actual
5 revenue gap for each Plan Year ("PY") given the approved
6 target revenue, not on the average of the three PYs.

7 The fact that an issue is not addressed should not be construed as an
8 endorsement of any filed position.

9 **Q. WHAT IS YOUR GENERAL UNDERSTANDING OF AEP-OHIO'S ESP**
10 **PROPOSAL?**

11 A. My general understanding of AEP-Ohio's ESP proposal is that as of June
12 1, 2012, through May 31, 2015, for customers who do not take supply
13 from competitive suppliers, the Company's SSO, or the generation portion
14 of rates, will be based on the proposals in the Company's filing pursuant to
15 §§ 4928.141 and 4928.143 of the Ohio Revised Code. While I am not an
16 attorney, my understanding is that § 4928.143 provides for a broad array
17 of utility costs to be considered as part of an ESP proposal.

18 **Q. HAS THE COMPANY PROPOSED THAT ALL GENERATION-RELATED**
19 **RIDERS TO BE BYPASSABLE?**

20 A. No.

1 **Q. IS IT GENERALLY APPROPRIATE FOR GENERATION-RELATED**
2 **RIDERS TO BE BYPASSABLE BY CUSTOMERS TAKING SUPPLY**
3 **FROM A COMPETITIVE SUPPLIER?**

4 A. Yes. The price paid to the supplier by customers taking competitive
5 supply includes the cost of power and the cost of procurement for that
6 power, compliance costs, and other underlying operating costs. Charging
7 competitively supplied customers for any part of AEP-Ohio's generation-
8 related costs misaligns cost causation and cost responsibility, results in
9 inequitable rates as those customers will pay a cost for which they will
10 receive no benefit, and can result in double payment of costs, such as
11 compliance costs, that are incurred by AEP-Ohio to serve their SSO
12 customers and likewise incurred by competitive suppliers to serve their
13 respective customers. Additionally, this cost misalignment moves
14 generation rates for the Company's SSO customers and competitively
15 supplied customers away from the respective cost of service for each, and
16 does not provide for rates that reflect cost causation, send proper price
17 signals, and minimize price distortions.

18 **Q. GENERALLY, WHAT IS WALMART'S POSITION ON SETTING RATES**
19 **BASED ON THE UTILITY'S COST OF SERVICE?**

20 A. Walmart advocates that rates be set based on the cost of service. This
21 produces equitable rates that reflect cost causation principles, send proper
22 price signals, and minimize price distortions.

Generation Resource Rider ("GRR")

Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED GRR?

A. My understanding is that the Company has proposed the GRR as a method to recover their costs related to new generation resources that the Company owns or operates dedicated to serving their Ohio customers. See Direct Testimony of Philip J. Nelson, page 20, line 9 to line 11.

Q. HAS THE COMPANY PROPOSED THAT THE GRR BE NON-BYPASSABLE?

A. Yes. *Id.*

Q. SHOULD THE COMMISSION APPROVE THE COMPANY'S REQUEST TO MAKE THE GRR NON-BYPASSABLE?

A. No. As I stated earlier in my testimony, it is not appropriate to charge customers taking competitive generation supply for generation-related costs incurred for serving the Company's SSO customers, as it misaligns cost causation and cost responsibility principles and results in inequitable rates as those customers will pay a cost for which they will receive no benefit. Competitively supplied customers will not receive power from the plants the Company owns and operates that are dedicated to its Ohio retail load and as such should not be required to pay any portion of those plants' cost.

1 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THE**
2 **COMPANY'S PROPOSED GRR?**

3 A. If the Commission approves a GRR, it should determine that the rider be
4 bypassable by customers who take competitive supply service.

5
6 ***Retail Stability Rider ("RSR")***

7 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED**
8 **RSR?**

9 A. My understanding is that the Company has proposed the RSR in order to
10 recoup what they state are lost revenues due to the difference in their
11 proposed cost of service-based capacity price and the lower capacity price
12 they have proposed as part of their overall ESP proposal. The Company
13 proposes to terminate the RSR at the end of May, 2015, when they will no
14 longer provide capacity as an FRR entity. See Direct Testimony of
15 William A. Allen, page 13, line 4 to line 15.

16 **Q. DOES WALMART TAKE A POSITION AT THIS TIME AS TO THE**
17 **EXISTENCE OF THE REVENUE GAP TO BE ADDRESSED BY THE**
18 **RSR?**

19 A. No. My understanding is that the cost of capacity is currently being
20 litigated in Case No. 10-2929-EL-UNC. Walmart is not a party to that
21 docket and does not take a position on those issues. My testimony will

1 instead address issues related to the implementation of the proposed RSR
2 should the Commission determine that the rider is needed.

3 **Q. DO YOU HAVE CONCERNS WITH THE PROPOSED RSR?**

4 A. Yes. I have two concerns with the RSR:

5 1) The proposed ROE used for calculating the rider is not justified and should
6 be lower; and

7 2) The structure of the proposed annual revenue requirements of the rider
8 should be modified to reflect actual, not average, annual revenue gaps.

9 **Q. WHAT ROE DOES THE COMPANY PROPOSE TO USE TO**
10 **CALCULATE THE RSR REVENUE REQUIREMENT?**

11 A. The Company proposes to use a ROE of 10.5 percent which results in a
12 target non-fuel generation revenue requirement of \$929 million. See
13 Direct Testimony of William A. Allen, page 14, line 7 to line 10 and Exhibit
14 WAA-6.

15 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S REASON TO**
16 **USE A ROE OF 10.5 FOR THE RSR?**

17 A. My understanding is that the Company believes that a ROE of 10.5 would
18 produce a level of revenues that would provide financial stability for AEP
19 Ohio. *Id.* However, this statement does not appear to be directly
20 supported by any analysis.

1 **Q. HAS THE COMPANY PROPOSED A ROE IN THIS DOCKET TO BE**
2 **USED FOR OTHER CALCULATION PURPOSES?**

3 A. Yes. The Company has proposed a ROE to be used to calculate the
4 weighted average cost of capital to be applied to non-FAC riders including
5 in their proposed ESP. See Direct Testimony of Renee V. Hawkins, page
6 4, line 1 to line 4.

7 **Q. WHAT ROE HAS THE COMPANY PROPOSED?**

8 A. The Company has proposed a ROE of 10.2 percent, which they represent
9 as the cost of equity to which the Company agreed in Case No. 11-351-
10 EL-AIR and Case No. 11-352-EL-AIR and approved by the Commission in
11 its Order in those dockets.¹ *Id.*, page 4, line 22 to page 5, line 1.

12 **Q. WOULD IT BE MORE APPROPRIATE FOR THE RSR TO USE THE**
13 **SAME COMMISSION-APPROVED ROE AS THE OTHER RIDERS?**

14 A. Yes. Without clear justification for a higher ROE than that previously and
15 recently approved by the Commission, if the Commission approves a
16 RSR, the ROE used to calculate the revenue requirement should be no
17 higher than 10.2 percent, the ROE previously approved by the
18 Commission.

¹ The Commission's order in Case Nos. 11-351-EL-AIR and 11-352-EL-AIR indicates that the approved ROE for Columbus Southern Power is 10.0 percent and for Ohio Power is 10.3 percent. See Opinion and Order, December 14, 2011, page 12.

1 **Q. IS IT EASY TO DETERMINE THE STRUCTURE OF THE PROPOSED**
2 **ANNUAL RSR REVENUE REQUIREMENTS?**

3 A. Not exactly. AEP Ohio has two witnesses present information regarding
4 the proposed annual RSR revenue requirements and it appears the
5 information provided by each does not match. Company witness Allen
6 presents a three-year look in his exhibit. From his exhibit it appears that,
7 using an annual target revenue of \$929 million, for PY 2012/2013, the
8 revenue requirement is estimated to be \$44.1 million, for PY 2013/2014
9 the revenue requirement is estimated to be \$102.9 million, and for PY
10 2014/2015 the revenue requirement is estimated to be \$137.2 million.
11 See Exhibit WAA-6. However, Company witness Roush calculates his
12 illustrative RSR using an annual revenue requirement of \$94.7 million, the
13 average of witness Allen's three PYs instead of calculating the RSR
14 separately for each year. See Exhibit DMR-3.

15 **Q. IS THIS A CONCERN?**

16 A. Yes. AEP Ohio's RSR calculation methodology front loads a portion of
17 their revenue gaps from PYs 2013/2014 and 2014/2015 into the first year
18 of the ESP. This is not an equitable result, as it fails to reflect the actual
19 revenue gap and would charge customers early for revenue gap revenues
20 that may not materialize in the later PYs.

1 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS**
2 **ISSUE?**

3 A. If the Commission approves a RSR, the annual revenue requirement
4 should be based on the actual revenue gap for each PY given the
5 approved target revenue, not on the average of the three PY.

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

7 A. Yes.

Steve W. Chriss

Senior Manager, Energy Regulatory Analysis

Wal-Mart Stores, Inc.

Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550

Business Phone: (479) 204-1594

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

2012

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.

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO,
EL-349-EL-AAM, and 11-350-EL-AAM

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

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO,
EL-349-EL-AAM, and 11-350-EL-AAM

Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

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

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

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

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

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

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

2010

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

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

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

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

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

Washington Utilities and Transportation Commission Docket No. 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."

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO,
EL-349-EL-AAM, and 11-350-EL-AAM

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.

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO,
EL-349-EL-AAM, and 11-350-EL-AAM

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.

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO,
EL-349-EL-AAM, and 11-350-EL-AAM

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.

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Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
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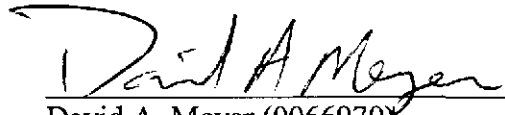
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Direct Testimony of Steve W. Chriss was served by sending a true and correct copy via electronic mail to all parties on this 4th day of May, 2012.


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