

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION OF	)	
OHIO POWER COMPANY FOR AUTHORITY TO	)	CASE NO. 16-1852-EL-SSO
ESTABLISH A STANDARD SERVICE OFFER	)	
PURSUANT TO §4928.143, OHIO REV. CODE,	)	
IN THE FORM OF AN ELECTRIC SECURITY PLAN	)	
IN THE MATTER OF THE APPLICATION OF	)	
OHIO POWER COMPANY FOR APPROVAL OF	)	CASE NO. 16-1853-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.**

**MAY 2, 2017**

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**Exhibit SWC-1:** Witness Qualifications Statement

**Exhibit SWC-2:** Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2014 to Present

1    **Introduction**

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

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

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

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

9        **Q.     IS WALMART SPONSORING ANOTHER WITNESS IN THIS DOCKET?**

10       A.     Yes. Walmart is also sponsoring the testimony of Chris W. Hendrix, Director of  
11              Markets and Compliance.

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

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

1 Energy Regulatory Analysis, in June 2011. I was promoted to my current position in  
2 October, 2016. My Witness Qualifications Statement is attached as Exhibit SWC-1.

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

5 A. Yes. I submitted testimony in Docket Nos. 10-2586-EL-SSO, 11-346-EL-SSO, 12-426-  
6 EL-SSO, 13-2385-EL-SSO, 14-841-EL-SSO, 14-1297-EL-SSO, and 14-1693-EL-RDR.

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

9 A. Yes. I have submitted testimony in over 150 proceedings before 37 other utility  
10 regulatory commissions. I have also submitted testimony before several Missouri  
11 House and Senate Committees and the Kansas House Standing Committee on  
12 Utilities and Telecommunications. My testimony has addressed topics including, but  
13 not limited to, cost of service and rate design, return on equity ("ROE"), revenue  
14 requirements, ratemaking policy, large customer renewable programs, qualifying  
15 facility rates, telecommunications deregulation, resource certification, energy  
16 efficiency/demand side management, fuel cost adjustment mechanisms, decoupling,  
17 and the collection of cash earnings on construction work in progress ("CWIP").

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

19 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 173 retail units and 5 distribution centers and employs 50,481  
3             associates in Ohio. In fiscal year ending 2017, Walmart purchased \$15.6 billion  
4             worth of goods and services from Ohio-based suppliers, supporting 118,981 supplier  
5             jobs.<sup>1</sup>

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

8       A.     Walmart has 56 stores, four distribution centers, and related facilities that take  
9             electric service from Ohio Power Company ("OPC" or "Company").

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

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

13       A.     The purpose of my testimony is to address aspects of OPC's amended electric  
14             security plan filing and to provide recommendations to assist the Commission in  
15             thoroughly and carefully considering the customer impact of the Company's  
16             proposals.

17       **Q.     PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE COMMISSION.**

18       A.     Walmart's recommendations to the Commission are as follows:

- 19             1)     The Commission should consider ways to simplify the rate structure,  
20                     including requiring OPC to file a base rate case to roll costs, both current and

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

1 proposed, to be recovered by numerous riders into the Company's base  
2 rates.

3 2) The Commission should reject OPC's proposal to include revenues related to  
4 the expiration of the theoretical accumulated depreciation reserve in the  
5 Distribution Investment Rider ("DIR").

6 3) The Commission should reject the Company's proposed annually-adjusted  
7 indexed ROE mechanism ("AIRM"). Should the Commission approve the  
8 Company's proposed AIRM or some modification thereto, it should consider  
9 the extent to which the implementation of the mechanism reduces OPC's risk  
10 and should be reflected in the ROE approved in this docket.

11 4) In setting the ROE for OPC, the Commission should consider the following:

- 12 a. the impact of the resulting rates, particularly increases in the DIR, on  
13 customers;
- 14 b. the Company's reduced exposure to risk from regulatory lag because of  
15 the proposed DIR and the other proposed and existing riders; and
- 16 c. ROEs approved by other commissions since 2014.

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

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

**Rate Structure Complexity**

**Q. WHAT IS YOUR GENERAL UNDERSTANDING OF OPC'S ESP PROPOSAL?**

A. My general understanding of OPC's ESP proposal is that as of June 1, 2017 and continuing through May 31, 2024, rates for customers who do not take supply from competitive suppliers, the Company's standard service offer, or the generation portion of rates, will be based on the proposals in the Company's filing pursuant to §§ 4928.141 and 4928.143 of the Ohio Revised Code. While I am not an attorney, my understanding is that § 4928.143 provides for a broad array of utility costs to be considered as part of an ESP proposal.

**Q. DOES OPC'S PROPOSED ESP COVER A BROAD ARRAY OF UTILITY COSTS?**

A. Yes. The Company's ESP filing demonstrates the breadth of utility costs considered in an ESP. By way of example, OPC's exhibit listing of proposed rider changes identifies thirty (30) separate riders. Of those thirty total riders, the Company proposes no changes, but maintenance of the following riders:

- Universal Service Fund Rider;
- Bad Debt Rider;
- kWh Tax Rider;
- Residential Distribution Credit Rider;
- Pilot Throughput Balancing Adjustment Rider;
- Deferred Asset Phase-In Rider;
- Generation Energy Rider;

- Generation Capacity Rider;
- Electronic Transfer Rider;
- Pilot Demand Response Rider;
- Enhanced Service Reliability Rider ("ESRR")<sup>2</sup>;
- gridSMART Phase 1 Rider;
- gridSMART Phase 2 Rider;
- Retail Stability Rider;
- DIR<sup>3</sup>;
- Storm Damage Recovery Rider ("SDRR");
- Alternative Energy Rider; and
- Phase-In Recovery Rider.

The Company proposes changes to the following riders:

- Interruptible Power Rider;
- Auction Cost Reconciliation Rider;
- Basic Transmission Cost Rider;
- Energy Efficiency/Peak Demand Reduction Rider; and
- Economic Development Cost Recovery Rider.

And, finally, the Company proposes the creation of the following new riders:

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<sup>2</sup> OPC proposes to increase the expenditures recovered by the ESRR. See Direct Testimony of Selwyn J. Dias, page 14, lines 14-16.

<sup>3</sup> OPC proposes to increase the distribution capital investment recovered through the DIR for 2018 through 2024. *Id.* at lines 10-13.



- County Fair Transmission Supplement;
- Automaker Credit Rider;
- Competition Incentive Rider;
- SSO Credit Rider;
- Renewable Generation Rider ("RGR");
- Submetering Rider; and
- Distribution Technology Rider ("DTR"). See Exhibit DRG-1.

**Q. DO YOU HAVE A GENERAL COMMENT ABOUT THE COMPANY'S ESP PROPOSAL?**

A. Yes. OPC already operates under an extraordinarily complex set of rates. Rather than reducing potential customer confusion, the ESP proposal makes an already complex process even more complex. For example, in order for a commercial shopping customer to conduct a bill analysis under the ESP proposal, the customer must evaluate not only the Company's base rates, but also up to 25 riders some of which change quarterly. A commercial standard service offer ("SSO") customer would add five additional riders that it must consider. See Exhibit DRG-8, page 4. Rather than approving additional riders that only serve to further complicate the process, the Commission should consider ways to simplify the rate structure. One such solution for simplifying the rate structure could include requiring OPC to file a base rate case to roll the multiple costs currently and proposed to be recovered through its numerous riders into the Company's base rates.

**Distribution Investment Rider**

**Q. WHAT IS YOUR UNDERSTANDING OF OPC'S PROPOSED MODIFICATIONS TO THE DIR?**

A. My understanding is that OPC proposes to modify the DIR to increase distribution capital investment for 2018 through 2024 to an average annual amount of \$225 million. However, the Company also states that they may invest more capital than the average annual \$225 million investment if they believe it is necessary to maintain current distribution reliability levels. See Direct Testimony of Selwyn J. Dias, page 14, line 6 to page 15, line 14.

**Q. DOES THE COMPANY PROPOSE ANY OTHER CHANGES TO THE DIR?**

A. Yes. The Company proposes to include an additional \$38.7 million of revenue requirement in the DIR to reflect the expiration of the theoretical accumulated depreciation reserve that was included in the Company's last base rate case settlement. See Direct Testimony of Andrea E. Moore, page 15, lines 6-10 and Joint Stipulation and Recommendation, Case Nos. 11-351-EL-AIR, *et al.*, pages 7-8.

**Q. DOES THE COMPANY PROVIDE ESTIMATES OF THE DIR RATES FOR 2018 THROUGH 2024?**

A. Yes, as shown in Table 1 below. While the Company describes the rate increases as "modest," an examination of the Company's estimates show that customers face significant increases due to the DIR proposals. Direct Testimony of Selwyn J. Dias, page 14, line 13.

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**Table 1. Ohio Power Company Estimates of DIR Rates, 2018 to 2024.**

Year	Revenue Cap	Base Revenue Requirement	Rate	Year-Over-Year Increase
2017			28.98750%	-
2018	\$226,000,000	\$633,702,536	35.66342%	6.7%
2019	\$312,000,000	\$633,702,536	49.23446%	13.6%
2020	\$343,000,000	\$633,702,536	54.12634%	4.9%
2021	\$373,000,000	\$633,702,536	58.86042%	4.7%
2022	\$401,000,000	\$633,702,536	63.27890%	4.4%
2023	\$427,000,000	\$633,702,536	67.38177%	4.1%
2024	\$444,000,000	\$633,702,536	70.06442%	2.7%
<b>Average</b>				<b>5.8%</b>
Sources: WP DRG-2 and Ohio Power Company, P.U.C.O. No. 20, 18 <sup>th</sup> Revised Sheet No. 489-1, Distribution Investment Rider. 2017 rate is actual rate as of April 29 <sup>th</sup> , 2017.				

2

3 **Q. DOES WALMART HAVE CONCERNS WITH THE COMPANY'S PROPOSED**  
4 **MODIFICATIONS TO THE DIR?**

5 A. Yes. Under the revenue caps proposed by the Company, and with the proposed  
6 inclusion of revenues related to the expiration of the theoretical accumulated  
7 depreciation reserve, the DIR rate could potentially double over the term of the ESP  
8 and collect an amount equal to 70 percent of the Company's base rates by 2024. As  
9 shown in Table 1, the results in a potential average annual base rate increase to  
10 OPC's customers of 5.8 percent, with no base rate case review.

11 **Q. DOES THE DIR PROVIDE A REDUCTION IN REGULATORY LAG FOR OPC?**

12 A. Yes, because the increases would occur without a base rate case and the riders  
13 "provide a mechanism to quickly and efficiently recover costs." Direct Testimony of  
14 Selwyn J. Dias, page 20, lines 8-9. As such, a large portion of OPC's revenues that  
15 would ostensibly otherwise be collected through base rates are protected from the

1 regulatory lag that occurs between when the costs are incurred and a subsequent  
2 base rate case.

3 **Q. HAS OPC MADE AN ADJUSTMENT TO ITS PROPOSED ROE TO ACCOUNT FOR THE**  
4 **REDUCTION IN RISK OF REGULATORY LAG?**

5 A. It does not appear to have done so. As I discuss below, this creates a concern that  
6 the Company's proposed ROE in this case is excessive.

7 **Q. DOES WALMART HAVE A CONCERN WITH THE INCLUSION OF REVENUES RELATED**  
8 **TO THE THEORETICAL ACCUMULATED DEPRECIATION RESERVE EXPIRATION?**

9 A. Yes. My understanding is that the DIR exists to recover incremental costs related to  
10 distribution system safety and reliability. As such, the DIR should not be used as a  
11 vehicle to make the Company whole for unrelated revenue changes due to the  
12 expiration of provisions of a base rate case settlement. To the extent the Company  
13 is concerned that the non-collection of these revenues impacts its earnings, the  
14 Company can file a base rate case to recover the revenues.

15 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

16 A. The Commission should reject OPC's proposal to include revenues related to the  
17 expiration of the theoretical accumulated depreciation reserve in the DIR.

1    **Return on Equity**

2        **Q.    WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ROE IN THIS**  
3        **DOCKET?**

4        A.    My understanding is that the Company is proposing an ROE of 10.41 percent and an  
5        overall weighted average cost of capital ("WACC") of 8.23 percent. See Direct  
6        Testimony of Matthew D. Kyle, page 5, lines 19-21. The Company's proposed WACC  
7        would be applied to the ESRR, gridSMART Phase II Rider, the Submetering Rider, the  
8        DIR, the DTR, and the RGR. *Id.*, page 8, lines 12-18.

9        **Q.    IS WALMART CONCERNED THAT THE PROPOSED ROE OF 10.41 PERCENT IS**  
10       **EXCESSIVE?**

11       A.    Yes, as the Company proposes to continue and expand the use of the DIR and other  
12       riders to reduce its regulatory lag on a significant amount of its revenues that would  
13       otherwise be collected through base rates. Additionally, the proposed ROE of 10.41  
14       is significantly higher than 10.0 percent and 10.3 percent, the ROEs awarded to  
15       Columbus Southern Power and OPC, respectively, in the Company's last base rate  
16       case. See December 14, 2011 Opinion and Order in Case Nos. 11-351-EL-AIR, *et al.*,  
17       page 12.<sup>4</sup> In comparing these figures, the Commission should note that costs  
18       recovered through base rates are subject to *more* risk than costs recovered through  
19       riders in this case due specifically to the increase in regulatory lag inherent in

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<sup>4</sup> The November 23, 2011, Stipulation allows for an ROE of 10.2 percent for the merged Columbus Southern Power and OPC. See Joint Stipulation and Recommendation, Case Nos. 11-351-EL-AIR, *et al.*, page 5.

1 recovery through base rates. Despite the lower risk of regulatory lag when costs are  
2 recovered through riders the Company has nonetheless proposed a higher ROE in  
3 this case.

4 **Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN THE ROES**  
5 **APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS IN 2014, 2015, 2016,**  
6 **AND SO FAR IN 2017?**

7 A. Yes. According to data from SNL Financial, a financial news and reporting company,  
8 the average of the 100 reported electric utility rate case ROEs authorized by  
9 commissions to investor-owned utilities in 2014, 2015, 2016, and so far in 2017, is  
10 9.65 percent. The range of reported authorized ROEs for the period is 8.64 percent  
11 to 10.55 percent, and the median authorized ROE is 9.65 percent. The average and  
12 median values are significantly below the Company's proposed ROE of 10.41  
13 percent. See Exhibit SWC-2.

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

16 A. Yes. The average reported ROE for distribution only utilities or for rate cases that  
17 only dealt with distribution rates is 9.37 percent. *Id.* This is 104 basis points lower  
18 than OPC's proposed ROE.

1       **Q.     DOES THE COMPANY PROPOSE ANY MECHANISMS TO ADJUST ITS ROE AND WACC**  
2       **DURING THE ESP TERM?**

3       A.     Yes. The Company proposes an AIRM to recalculate the ROE and WACC each year of  
4       the ESP term. *See* Direct Testimony of Matthew D. Kyle, page 6, lines 9-19.

5       **Q.     WHAT IS YOUR UNDERSTANDING OF HOW THE AIRM WOULD WORK?**

6       A.     My understanding is that Company proposes an adjustment mechanism that tracks  
7       the year-over-year changes in the year-end Moody's Baa Utility Bond Index and  
8       applies those changes to the Company's ROE, subject to a cap of 12.5 percent and a  
9       floor of 10.2 percent. So a 10 basis point change in the Moody's index would result  
10      in a corresponding 10 basis point change to the ROE. *Id.*, page 7, lines 11-22.

11      **Q.     DOES WALMART HAVE CONCERNS WITH THE COMPANY'S PROPOSED FORMULA?**

12      A.     Yes. While a few states use annual formula rate reviews in the retail ratemaking  
13      process, the formula proposed by the Company is, in my experience, not widely  
14      accepted as a retail ratemaking mechanism. To my knowledge, the only significant  
15      use of an indexed ROE-setting methodology at the retail ratemaking level is in Illinois  
16      and California, but there are differences that warrant Commission attention.

17      **Q.     PLEASE EXPLAIN.**

18      A.     In Illinois, the methodology was imposed upon the Illinois Commerce Commission by  
19      the legislature, not through commission approval of a fully litigated proposal.  
20      Additionally, the Illinois structure contains a provision that sets a deadband of 50  
21      basis points above or below the baseline within which there are no rate changes.

1 See 220 ILCS 5/16-108.5(c)(3)(B). No such deadband exists in OPC's proposal. In  
2 California, the California Public Utilities Commission requires that the utilities file  
3 complete cost of capital applications every three years, thus, ROE changes and  
4 related rate increases cannot proceed unabated for the length of time contemplated  
5 by the Company in this case. See *Decision Establishing a Multi-Year Cost of Capital*  
6 *Mechanism for the Major Electric Utilities*, CPUC Decision 08-05-035, May 29, 2008,  
7 page 6. The California mechanism, similar to the Illinois structure, also implements a  
8 deadband of 100 basis points above or below the baseline within which there are no  
9 rate changes. See *Phase 2 Decision on the Cost of Capital Adjustment Mechanism*  
10 *and Correction of Phase 1 Decision Typographical Errors*, CPUC Decision D13-03-015,  
11 March 21, 2013, page 2.

12 **Q. ARE YOU CONCERNED THAT THE PROPOSED AIRM IS NOT BASED ON THE**  
13 **COMPANY'S COST OF SERVICE?**

14 A. Yes. The proposed AIRM contains no contemplation of the Company's cost of  
15 service, including their cost of capital, performance, or financial position. The AIRM  
16 merely proposes to reset ROE and rates based on the outcome of a year-over-year  
17 index calculation, regardless of whether the reset is cost-based. Additionally,  
18 because the AIRM is not based on anything that is within control of the Company, it  
19 provides no incentive for the utility to improve or maintain its performance.



1       **Q.     ARE YOU CONCERNED THAT THE PROPOSED AIRM IS ASYMMETRICAL AND**  
2       **STRUCTURED TO BENEFIT THE COMPANY FAR MORE THAN CUSTOMERS?**

3       A.     Yes. Using the Company's proposed ROE of 10.41 percent and its Proposed AIRM  
4       with a cap of 12.5 percent and a floor of 10.2 percent, the Company only has 21  
5       basis points of downside exposure but 209 basis points of upside potential. As a  
6       result, it is very likely that the mechanism will only serve to increase customer rates  
7       over the term of the ESP, which is unlikely to occur if the Commission orders a single  
8       ROE for the term.

9       **Q.     HAS THE COMPANY PROPOSED AN ADJUSTMENT OR REDUCTION IN ITS ROE TO**  
10       **ACCOUNT FOR THE REDUCED RISK OF REGULATORY LAG PROVIDED BY THE**  
11       **PROPOSED AIRM?**

12       A.     No. My understanding is that the Company has proposed its ROE with the proposed  
13       AIRM in place.

14       **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION REGARDING THE**  
15       **COMPANY'S PROPOSED AIRM?**

16       A.     The Commission should reject the Company's proposed AIRM. Should the  
17       Commission approve the Company's proposed AIRM or some modification thereto,  
18       it should consider the extent to which the implementation of the mechanism further  
19       reduces OPC's risk and should be reflected in the ROE approved in this docket.

1       **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION REGARDING THE**  
2       **COMPANY'S PROPOSED ROE?**

3       A.     In setting the ROE for OPC, the Commission should consider the impact of the  
4       resulting rates, particularly increases in the DIR, on customers, the Company's  
5       reduced exposure to risk from regulatory lag through the proposed DIR and the  
6       other proposed and existing riders, and the ROEs approved by other commissions in  
7       2014, 2015, 2016, and so far in 2017.

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

9       A.     Yes.

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**ON BEHALF OF**

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

**ON BEHALF OF**

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

# Steve W. Chriss

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

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

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

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

June 2003 – July 2007

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

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

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

January 2003 - May 2003

**North Harris College**, Houston, TX

**Adjunct Instructor, Microeconomics**

June 2001 - March 2003

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

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

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

## EDUCATION

2001 **Louisiana State University**

M.S., Agricultural Economics

1997-1998 **University of Florida**

Graduate Coursework, Agricultural Education and Communication

1997 **Texas A&M University**

B.S., Agricultural Development

B.S., Horticulture

## TESTIMONY BEFORE REGULATORY COMMISSIONS

2017

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

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

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

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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

2015

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

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

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

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

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

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

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

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

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

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

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

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

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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

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

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

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

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

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

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

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

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

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

**2014**

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

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

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

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



**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *2013*

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

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

Florida Public Service Commission Docket No. 130140-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.

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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

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

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

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

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

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

Florida Public Service Commission Docket No. 130040-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.

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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.

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-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 Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

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

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

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

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

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

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

*2010*

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

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

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

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

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

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

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

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

**Wal-Mart Stores East, LP and Sam's East, Inc.**  
**Exhibit SWC-1**  
**Ohio Case Nos. 16-1852-EL-SSO and 16-1853-EL-AAM**

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**

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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**

*2017*

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

*2016*

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

*2014*

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

*2012*

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

*2011*

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

**AFFIDAVITS**

*2015*

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

*2011*

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

**ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

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

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

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

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

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

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

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

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

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

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

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

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

Panelist, Customer Panel, Virginia State Bar 29<sup>th</sup> National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19<sup>th</sup> Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

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Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION OF	)	
OHIO POWER COMPANY FOR AUTHORITY TO	)	CASE NO. 16-1852-EL-SSO
ESTABLISH A STANDARD SERVICE OFFER	)	
PURSUANT TO §4928.143, OHIO REV. CODE,	)	
IN THE FORM OF AN ELECTRIC SECURITY PLAN	)	
IN THE MATTER OF THE APPLICATION OF	)	
OHIO POWER COMPANY FOR APPROVAL OF	)	CASE NO. 16-1853-EL-AAM
CERTAIN ACCOUNTING AUTHORITY	)	

**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, 2014 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
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%
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%
Kansas	Kansas City Power & Light	15-KCPE-116-RTS	9/10/2015	V	9.30%
New York	Orange & Rockland Utlts Inc.	14-E-0493	10/15/2015	D	9.00%
Michigan	Consumers Energy Co.	U-17735	11/19/2015	V	10.30%
Wisconsin	Wisconsin Public Service Corp.	6690-UR-124	11/19/2015	V	10.00%
Wisconsin	Northern States Power Co.	4220-UR-121	12/3/2015	V	10.00%
Illinois	Ameren Illinois	15-0305	12/9/2015	D	9.14%
Illinois	Commonwealth Edison Co.	15-0287	12/9/2015	D	9.14%

## Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2014 to Present

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
Michigan	DTE Electric Co.	U-17767	12/11/2015	V	10.30%
Oregon	Portland General Electric Co.	UE 294	12/15/2015	V	9.60%
Texas	Southwestern Public Service Co	43695	12/17/2015	V	9.70%
Idaho	Avista Corp.	AVU-E-15-05	12/18/2015	V	9.50%
Wyoming	PacifiCorp	20000-469-ER-15	12/30/2015	V	9.50%
Washington	Avista Corp.	UE-150204	1/6/2016	V	9.50%
Arkansas	Entergy Arkansas Inc.	15-015-U	2/13/2016	V	9.75%
Indiana	Indianapolis Power & Light Co.	44576	3/16/2016	V	9.85%
Massachusetts	Fitchburg Gas & Electric Light	15-80	4/29/2016	D	9.80%
Maryland	Baltimore Gas and Electric Co.	9406	6/3/2016	D	9.75%
New Mexico	El Paso Electric Co.	15-00127-UT	6/8/2016	V	9.48%
New York	NY State Electric & Gas Corp.	15-E-0283	6/15/2016	D	9.00%
New York	Rochester Gas & Electric Corp.	15-E-0285	6/15/2016	D	9.00%
Indiana	Northern Indiana Public Service Co.	44688	7/18/2016	V	9.98%
Tennessee	Kingsport Power Company	16-00001	8/9/2016	V	9.85%
Arizona	UNS Electric Inc.	E-04204A-15-0142	8/18/2016	V	9.50%
New Jersey	Atlantic City Electric Co.	ER-16030252	8/24/2016	D	9.75%
Washington	PacifiCorp	UE-152253	9/1/2016	V	9.50%
Michigan	Upper Peninsula Power Co.	U-17895	9/8/2016	V	10.00%
New Mexico	Public Service Co. of NM	15-00127-UT	9/28/2016	V	9.58%
Massachusetts	Massachusetts Electric Co.	15-155	9/30/2016	D	9.90%
Wisconsin	Madison Gas and Electric Co.	3270-UR-121	11/9/2016	V	9.80%
Oklahoma	Public Service Company of OK	PUD 201500208	11/10/2016	V	9.50%
Maryland	Potomac Electric Power Co.	9418	11/15/2016	D	9.55%
Wisconsin	Wisconsin Power and Light Co	6680-UR-120	11/18/2016	V	10.00%
Florida	Florida Power & Light Co.	160021-EI	11/29/2016	V	10.55%
California	Liberty Utilities CalPeco	A15-05-008	12/1/2016	V	10.00%
Illinois	Ameren Illinois	16-0262	12/6/2016	D	8.64%
Illinois	Commonwealth Edison Co.	16-0259	12/6/2016	D	8.64%
South Carolina	Duke Energy Progress Inc.	2016-227-E	12/7/2016	V	10.10%
New Jersey	Jersey Central Power & Light Co.	ER-16040383	12/12/2016	D	9.60%
Connecticut	United Illuminating Co.	16-06-04	12/14/2016	D	9.10%
Colorado	Black Hills Colorado Electric	16AL-0326E	12/19/2016	V	9.37%
Maine	Emera Maine	2015-00360	12/19/2016	D	9.00%
North Carolina	Virginia Electric & Power Co.	E-22 Sub 532	12/22/2016	V	9.90%
Nevada	Sierra Pacific Power Co.	16-06006	12/22/2016	V	9.60%
Idaho	Avista Corp.	AVU-E-16-03	12/28/2016	V	9.50%
Wyoming	MDU Resources Group Inc.	2004-117-ER-16	1/18/2017	V	9.45%
New York	Consolidated Edison Co. of NY	16-E-0060	1/24/2017	D	9.00%
Michigan	DTE Electric Co.	U-18014	1/31/2017	V	10.10%
Maryland	Delmarva Power & Light Co.	9424	2/15/2017	D	9.60%
New Jersey	Rockland Electric Company	ER-16050428	2/22/2017	D	9.60%
Arizona	Tucson Electric Power Co.	E-01933A-15-0322	2/24/2017	V	9.75%
Michigan	Consumers Energy Co.	U-17990	2/28/2017	V	10.10%
Minnesota	Otter Tail Power Co.	E-017/GR-15-1033	3/2/2017	V	9.41%
Oklahoma	Oklahoma Gas & Electric Co.	PUD 201500273	3/20/2017	V	9.50%
Florida	Gulf Power Co.	160186-EI	4/4/2017	V	10.25%
New Hampshire	Liberty Utilities Granite St	DE-16-383	4/12/2017	D	9.40%
New Hampshire	Unitil Energy Systems Inc.	DE-16-384	4/20/2017	D	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, 2014 to Present**

State	Utility	Docket	Decision Date	Vertically Integrated (V)/Distribution (D)	Return on Equity (%)
<b>Entire Period</b>					
		<b>100</b>			
	# of Decisions				
	Average (All Utilities)				9.65%
	Average (Distribution Only)				9.37%
	Average (Vertically Integrated Only)				9.81%
	Median				9.65%
	Minimum				8.64%
	Maximum				10.55%
<b>2014</b>					
	# of Decisions	<b>33</b>			
	Average (All Utilities)				9.75%
	Average (Distribution Only)				9.49%
	Average (Distribution Only, exc. IL FRP)				9.53%
	Average (Vertically Integrated Only)				9.92%
<b>2015</b>					
	# of Decisions	<b>23</b>			
	Average (All Utilities)				9.60%
	Average (Distribution Only)				9.17%
	Average (Distribution Only, exc. IL FRP)				9.19%
	Average (Vertically Integrated Only)				9.75%
<b>2016</b>					
	# of Decisions	<b>32</b>			
	Average (All Utilities)				9.60%
	Average (Distribution Only)				9.31%
	Average (Distribution Only, exc. IL FRP)				9.45%
	Average (Vertically Integrated Only)				9.77%
<b>2017</b>					
	# of Decisions	<b>12</b>			
	Average (All Utilities)				9.64%
	Average (Distribution Only)				9.42%
	Average (Distribution Only, exc. IL FRP)				9.42%
	Average (Vertically Integrated Only)				9.79%

Source: SNL Financial LC, April 28, 2017

## 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 2<sup>nd</sup> day of May, 2017.

/s/Carrie M. Harris

Carrie M. Harris (Ohio Bar ID 96138)

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**in**

**Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM**

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.