

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Authority to Establish a)	
Standard Service Offer Pursuant to R.C.)	Case No. 23-0023-EL-SSO
4928.143, in the Form of an Electric Security Plan)	

In the Matter of the Application of Ohio Power)	
Company for Approval of Certain Accounting)	
Authority)	Case No. 23-0024-EL-AAM

DIRECT TESTIMONY AND EXHIBITS OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

JUNE 9, 2023

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Exhibits

Exhibit AJK-1 – Alex J. Kronauer Witness Qualifications Statement

Exhibit AJK-2 – Calculations of Various Weighted Average Costs of Capital Using Proposed and Historic ROEs

Exhibit AJK-3 – DIR Capital Cost Impact under AEP Ohio Proposed and Historic Weighted Average Costs of Capital

Exhibit AJK-4 – Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

1 **I. Introduction**

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

3 A. My name is Alex J. Kronauer. My business address is 2608 SE J St., Bentonville, AR
4 72716. I am employed by Walmart Inc. ("Walmart") as a Senior Manager, Energy
5 Services.

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

6 A. I am testifying on behalf of Walmart.

7 **Q. IS WALMART SPONSORING ADDITIONAL TESTIMONY IN THIS CASE?**

8 A. Yes. Walmart is also sponsoring the testimony of Steve W. Chriss, Director, Energy
9 Services.

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

11 A. In 2011, I earned a Master of Business Administration at the McCombs School of
12 Business at The University of Texas at Austin with a concentration in Finance and
13 Investment Management. From 2011 to 2012, I was a Senior Financial Analyst at TXU
14 Energy, a Texas-based power supplier. My duties included load forecasting and
15 analysis. From 2012 to 2019, I was a Financial Analyst and later a Senior Financial
16 Analyst at CyrusOne, a data center provider in Dallas. I was involved in several power-
17 related areas, including demand response, power procurement, and power expense
18 forecasting. I joined the Walmart Energy Department in July 2019 as a Senior
19 Manager. Since joining Walmart, I have joined the Pacific Gas & Electric Cost
20 Allocation Mechanism Group and the Arizona Independent Scheduling Administrator

1 Association ("AZISA"), a trade association that supports open transmission access to
2 support retail electric competition in Arizona, and I have earned the Certified Rate of
3 Return Analyst ("CRR") designation. My Witness Qualification Statement is attached
4 as Walmart Exhibit 1.1.

5 **Q. DO YOU HOLD ANY CERTIFICATIONS THAT ARE RELEVANT TO THE ISSUES BEFORE**
6 **THE COMMISSION IN THIS PROCEEDING?**

7 A. Yes, I am a member of the Society of Utility and Regulatory Financial Analysts
8 ("SURFA"). In 2022, I was awarded the CRR professional designation by SURFA. The
9 CRR designation is based on education, experience, and the successful completion
10 of a comprehensive written examination.

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

13 A. Yes, I submitted testimony in Case Nos. 20-1651-EL-AIR, 20-1652-EL-AAM, and 20-
14 1653-EL-ATA.

15 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
16 **REGULATORY COMMISSIONS?**

17 A. Yes, I have submitted testimony with state regulatory commissions in 17 states as set
18 forth in Walmart Exhibit AJK-1.

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

20 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. As stated on Walmart's website, Walmart operates 170 retail units, 6 distribution
3 centers, two market fulfillment centers, and employs over 55,000 associates in Ohio.
4 In fiscal year ending 2023, Walmart purchased \$8.0 billion worth of goods and services
5 from suppliers, supporting over 112,000 additional jobs.¹

6 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE SERVICE**
7 **TERRITORY OF OHIO POWER COMPANY ("AEP OHIO" OR "COMPANY").**

8 A. Walmart is a large customer of AEP Ohio, with 56 stores, seven distribution centers,
9 and related facilities that take electric service from the Company, primarily on the
10 General Service ("Schedule GS") rate schedule.

11
12 **II. Purpose of Testimony and Summary of Recommendations**

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

14 A. The purpose of my testimony is to address aspects of AEP Ohio's Fifth Electric Security
15 Plan ("ESP V") filing and to provide recommendations to assist the Commission in
16 thoroughly and carefully considering the customer impact of the Company's proposed
17 rate increase.

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

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

¹ <https://corporate.walmart.com/about/ohio>

- 1 1. The Commission should consider ways to simplify the rate structure, including
2 requiring AEP Ohio to file a base rate case to move costs, both current and
3 proposed, from the numerous riders proposed by the Company into base rates.
- 4 2. The Commission should reject the Company's proposed increase in return on
5 equity ("ROE") and instead award an ROE no higher than 9.70 percent, the
6 Company's currently authorized ROE, in light of the following factors:
 - 7 a. The impact of the resulting rates on customers, particularly increases in
8 the Distribution Investment Rider ("DIR");
 - 9 b. The Company's reduced exposure to risk from regulatory lag because of
10 the proposed DIR and the other proposed and existing riders;
 - 11 c. Recent ROEs approved by the Commission; and
 - 12 d. ROEs approved by other commissions since 2019.
- 13 3. The Commission should reject the Company's request to increase its ROE to
14 account for purported flotation costs.

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

17 A. No. The fact that an issue is not addressed herein or in related filings should not be
18 construed as an endorsement of any filed position.

1 **III. Rate Structure Complexity**

2 **Q. WHAT IS YOUR UNDERSTANDING OF AEP OHIO'S ESP V PROPOSAL?**

3 A. AEP Ohio proposes that ESP V cover the period of June 1, 2024, through May 31, 2030.
4 See Application, page 2. The Company makes its ESP V filing pursuant to Ohio Rev.
5 Code § 4928.143, and in addition to proposals concerning the terms of the Company's
6 standard service offer ("SSO"), ESP V contains numerous provisions that the Company
7 claims address "provisions regarding its distribution service." *Id.*, page 3. While I am
8 not an attorney, my understanding is that Ohio Rev. Code § 4928.143 provides for a
9 broad array of utility costs to be considered as part of an ESP proposal.

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

11 A. Yes. The Company's ESP V filing proposes to recover a broad array of utility costs by
12 continuing a number of existing riders and through numerous newly proposed riders
13 as detailed below:

- 14 • DIR
- 15 • Enhanced Service Reliability Rider ("ESRR")
- 16 • Smart City Rider ("SCR")
- 17 • Economic Development Rider ("EDR")
- 18 • Bad Debt Rider ("BDR")

19 The Company also proposes modifying the tariffs applicable to:

- 20 • DIR
- 21 • ESRR

1 • SCR

2 • Interruptible Power – Discretionary Expanded Schedule ("RIDER IRP-E")

3 • Interruptible Power – Discretionary Legacy Schedule ("RIDER IRP-L")

4 The Company also proposes adding the following tariffs:

5 • Residential Plug-in Electric Vehicle ("Schedule RS-PEV")

6 • Public Transit & School Bus Plug-in Electric Vehicle ("Schedule BUS-PEV")

7 • Residential Senior Citizen tariff ("Schedule RS-SC")

8 • Customer Experience Rider ("CER")

9 • Energy Efficiency Rider ("EE Rider")

10 • Government Aggregation Standby Rider ("GASR")

11 • Ohio First Rider ("OFR")

12 • Rural Access Rider ("RAR")

13 And finally, the Company also proposes these new riders:

14 • CER

15 • EE Rider

16 • RAR

17 • GASR

18 • OFR

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

20 A. Yes. AEP Ohio already operates under an extraordinarily complex set of rates. Rather
21 than reducing potential customer confusion, the ESP V proposal makes an already

1 complex process even more complex. For example, in order for a commercial
2 shopping customer to conduct a bill analysis under the ESP V proposal, the customer
3 must not only evaluate the Company's base rates but also up to 28 riders, some of
4 which change quarterly. See Direct Testimony of Curtis M. Heitkamp, Exhibit CMH-5,
5 page 5. Rather than approving additional riders that further complicate the process,
6 the Commission should consider ways to simplify the rate structure, such as by
7 requiring AEP Ohio to file a base rate case to roll into base rate the costs proposed to
8 be recovered through riders.

9
10 **IV. Return on Equity and Cost of Capital**

11 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S CURRENTLY APPROVED ROE?**

12 A. My understanding is that the Company's currently authorized ROE is 9.70 percent.²

13 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED ROE AND**
14 **WEIGHTED AVERAGE COST OF CAPITAL ("WACC") IN THIS CASE?**

15 A. My understanding is that the Company proposes an ROE of 10.65 percent based on a
16 range of 9.8 percent to 11.3 percent without adjusting for flotation costs, and 9.9
17 percent to 11.4 percent after adjusting for the impact of common equity flotation
18 costs. See Direct Testimony of Adrien M. McKenzie, page 3, lines 18 to 20. The
19 Company proposes a cost of long-term debt of 4.40 percent and a capital structure of

² *In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates*, Case Nos. 20-0585-EL-AIR, *et al.*, Opinion and Order (issued Nov. 17, 2021), page 17, ¶ 48-E.

54.43 percent equity and 45.57 percent long-term debt for a proposed overall WACC of 7.80 percent. See Direct Testimony of Christine M. Minton, page 7, Figure CMM-1.

Q. DOES THE COMPANY IDENTIFY THE RIDERS FOR WHICH IT PROPOSES TO EARN A RETURN?

A. Yes, the Company proposes to earn a return of 10.65 percent for riders with a capital component, which include the DIR, CER and RAR. Direct Testimony of Christine M. Minton, page 7, lines 1 to 3.

Q. IS WALMART CONCERNED ABOUT THE REASONABLENESS OF THE COMPANY'S PROPOSED ROE?

A. Yes, especially when viewed in light of:

1. The impact of the resulting rates on customers, particularly increases in the DIR;
2. The Company's reduced exposure to risk from regulatory lag because of the proposed DIR and the other proposed and existing riders;
3. ROEs approved by the Commission; and
4. ROEs approved by other commissions since 2019.

A. Customer Impact

Q. DOES THE ROE APPLICABLE TO THE DIR, CER, AND RAR IMPACT THE LEVELS OF COSTS RECOVERED THROUGH THESE RIDERS?

A. Yes. The higher the ROE, the higher the revenue requirement for each of these riders. By contrast, a lower ROE reduces the revenue requirement for each of these riders. This is directionally true for the DIR, CER, and RAR.

1 **Q. WHICH OF THESE RIDERS FOR WHICH AEP OHIO PROPOSES TO EARN A RETURN HAS**
2 **THE LARGEST IMPACT ON CUSTOMERS?**

3 A. The DIR.

4 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S REQUESTED REVENUE**
5 **REQUIREMENT FOR ITS PROPOSED DIR IN THIS CASE?**

6 A. My understanding is that the Company requests to continue the DIR (it would be set
7 at \$0 if new DIR rates are not approved in this proceeding) and to recover \$2.7 billion
8 from customers during the term of ESP V. *See* Direct Testimony of Curtis M. Heitkamp,
9 Exhibit CMH-2, page 1.

10 **Q. USING THE DIR AS AN ILLUSTRATIVE EXAMPLE, HAVE YOU CALCULATED AN**
11 **ESTIMATE OF THE DIFFERENCE IN OPERATING INCOME RELATED TO DIR CAPITAL**
12 **INVESTMENT FROM THE DIFFERENCE BETWEEN THE CURRENTLY AUTHORIZED ROE**
13 **OF 9.70 PERCENT AND THE 10.65 PERCENT ROE PROPOSED BY THE COMPANY IN**
14 **THIS CASE?**

15 A. Yes. Holding DIR capital expenditures constant and using the Company's proposed
16 cost of debt and capital structure, the difference in operating income due to the
17 difference between the currently authorized ROE of 9.70 percent and the Company's
18 proposed 10.65 percent ROE is approximately \$78.4 million throughout the term of
19 the ESP V, or slightly more than \$13 million per year solely attributed to the
20 Company's proposed increased return. *See* Exhibit AJK-2 and Exhibit AJK-3. While I
21 have not performed similar calculations for the CER and RAR, similar calculations for
22 these riders would be directionally consistent with the DIR.

B. Regulatory Lag Reduction

Q. DOES THE COMPANY'S PROPOSAL TO RECOVER COSTS THROUGH RIDERS SUCH AS THE DIR, IN ADDITION TO THE OTHER RIDERS IN THE COMPANY'S PROPOSED ESP V, REDUCE THE COMPANY'S EXPOSURE TO RISK BY PROVIDING A REDUCTION IN REGULATORY LAG?

A. Yes, because in the absence of these various riders, the Company would need to seek recovery of these investments and other costs through base rates, and there would necessarily be a lag between when the Company incurs those costs and when the Company obtains Commission approval to recover them through base rates. By contrast, riders allow the Company to recover its costs more expeditiously and in closer proximity to when the costs were incurred. Thus, the use of riders (as opposed to base rate recovery) is a risk-reducing mechanism that should be reflected when setting the ROE.

Q. HAS AEP OHIO MADE AN ADJUSTMENT TO ITS PROPOSED ROE TO ACCOUNT FOR THE REDUCTION IN RISK OF REGULATORY LAG?

A. It does not appear to have done so. Rather, the Company appears to have done just the opposite, seeking approval to increase the 9.70 percent ROE agreed to in its last base rate case by 95 basis points in this ESP V. This creates a concern that the Company's proposed ROE in this case is excessive, especially when compared to historically awarded ROEs both from this Commission and other commissions across the country as I discuss below.

C. Recent ROEs Approved by the Commission

Q. IS THE COMPANY'S PROPOSED ROE SIGNIFICANTLY HIGHER THAN THE ROES APPROVED BY THE COMMISSION IN 2019, 2020, 2021, 2022, AND SO FAR IN 2023?

A. Yes. During 2019, 2020, 2021, 2022, and so far in 2023, the Commission has issued orders with a stated ROE in three dockets, with an average authorized ROE of 9.73 percent. *See* Exhibit AJK-4.

Q. IN WHICH DOCKETS DID THE COMMISSION ISSUE ORDERS WITH STATED ROES?

A. The Commission issued orders with stated ROEs in the following dockets:

- Docket No. 20-0585-EL-AIR, the Company's previous general rate case, in which the Commission approved an ROE of 9.70 percent.³
- Docket No. 21-0887-EL-AIR, the Duke Energy Ohio general rate case, in which the Commission approved an ROE of 9.50 percent.⁴
- Docket No. 20-1651-EL-AIR, the Dayton Power and Light Company d/b/a AES Ohio rate case, in which the Commission approved an ROE of 10.00 percent.⁵

³ *In the Matter of the Application of Ohio Power Company for an Increase in Electric Distribution Rates*, Case Nos. 20-0585-EL-AIR, *et al.*, Opinion and Order (issued Nov. 17, 2021), page 17, ¶ 48-E.

⁴ *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates*, Case Nos. 21-0887-EL-AIR, *et al.*, Opinion and Order (issued Dec. 14, 2022), page 60, ¶ 132.

⁵ *In the Matter of the Application of The Dayton Power and Light to Increase its Rates for Electric Distribution*, Case Nos. 20-1651-EL-AIR, *et al.*, Opinion and Order (issued Dec. 14, 2022), page 27, ¶ 75.

D. National Utility Industry ROEs and Weighted Equity Cost Trends

Q. HOW DOES THE COMPANY'S PROPOSED ROE COMPARE TO ELECTRIC ROES APPROVED BY OTHER UTILITY REGULATORY COMMISSIONS IN 2019, 2020, 2021, 2022, AND SO FAR IN 2023?

A. According to data from S&P Global Market Intelligence ("S&P Global"), a financial news and reporting company, the average of the 146 reported electric utility rate case ROEs authorized by commissions for investor-owned utilities in 2019, 2020, 2021, 2022, and so far in 2023, is 9.48 percent. See Exhibit AJK-4. The average electric ROE by year was:

TABLE 1
Average Electric ROE for from 2019-2023⁶

<u>Year</u>	<u>Average ROE</u>
2019	9.64 percent
2020	9.39 percent
2021	9.38 percent
2022	9.45 percent
2023 (to date)	9.75 percent

The range of reported authorized ROEs for the period is 7.36 percent to 10.60 percent, and the median authorized ROE is 9.50 percent. *Id.* Based on these numbers, the Company's requested ROE, if awarded, would be the highest ROE awarded to any utility in the entire United States over the course of the last nearly five years. As such,

⁶ See Exhibit AJK-4.

the Company's proposed 10.65 percent ROE is counter to broader electric industry trends.

Q. SEVERAL OF THE REPORTED AUTHORIZED ROEs ARE FOR VERTICALLY INTEGRATED UTILITIES. WHAT IS THE AVERAGE AUTHORIZED ROE IN THE REPORTED GROUP FOR DISTRIBUTION-ONLY UTILITIES?

A. S&P Global reports that the average electric ROE for distribution-only utilities authorized over the same period is 9.14 percent. *Id.* The average electric ROE by year was:

TABLE 2
Average Electric ROE for Distribution-Only Utilities from 2019-2023⁷

<u>Year</u>	<u>Average ROE</u>
2019	9.37 percent
2020	9.10 percent
2021	8.99 percent
2022	9.11 percent
2023 (to date)	9.70 percent

In fact, as shown in Figure 1, below, the Company's proposed 10.65 percent ROE, if approved, would be the highest approved electric ROE, by a significant margin, for a distribution-only utility at any time from 2019 to present.

⁷ See Exhibit AJK-4.

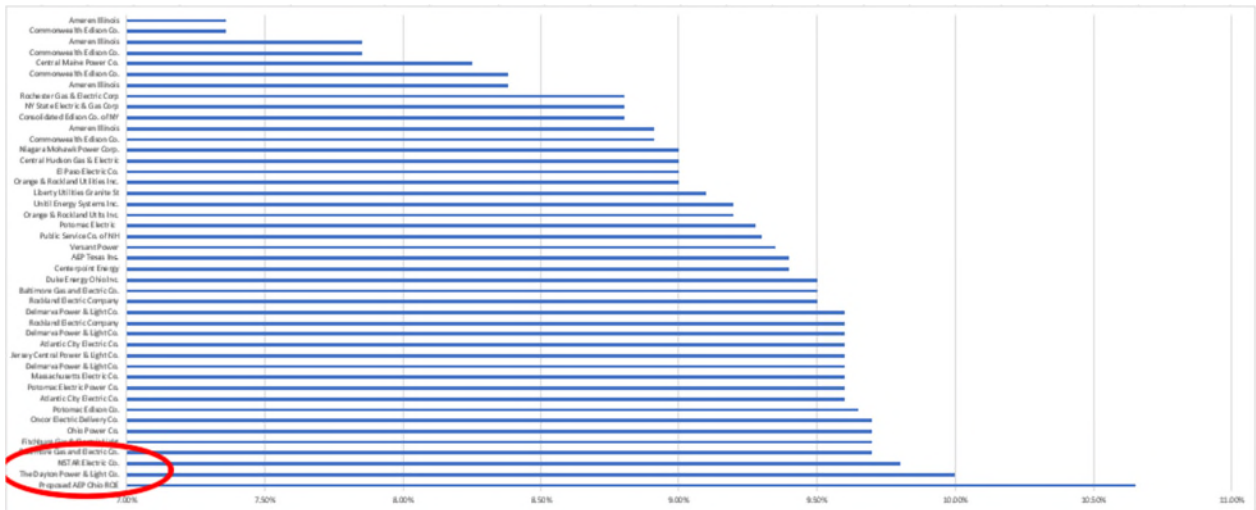


Figure 1. AEP Ohio Proposed 10.65 Percent ROE Versus Authorized ROEs for Distribution-only Utilities, 2019 through Present. Source: Exhibit AJK-4.

Q. AGAIN USING THE DIR AS AN EXAMPLE, HAVE YOU CALCULATED AN ESTIMATE OF THE IMPACT TO CUSTOMERS OF THE DIFFERENCE BETWEEN THE 9.14 PERCENT AVERAGE AUTHORIZED ROE FOR DISTRIBUTION-ONLY ELECTRIC UTILITIES FROM 2019 TO PRESENT AND COMPANY'S PROPOSED 10.65 PERCENT ROE?

A. Yes. Holding DIR capital expenditures constant and using the Company's proposed cost of debt and capital structure, the difference in operating income due to the difference between the distribution-only average authorized ROE of 9.14 percent and the Company's proposed 10.65 percent ROE is approximately \$124.5 million throughout the term of the ESP V. See Exhibit AJK-2 and Exhibit AJK-3. While I have not performed similar calculations for the CER and RAR, similar calculations for these riders would be directionally consistent with the DIR.

1 **Q. IS WALMART RECOMMENDING THAT THE COMMISSION BE BOUND BY ROEs**
2 **AUTHORIZED BY OTHER STATE REGULATORY AGENCIES?**

3 A. No, decisions of other state regulatory commissions are not binding on the
4 Commission. Each state regulatory commission considers the specific circumstances
5 in each case in its determination of the proper ROE. Walmart does, however, believe
6 that recent decisions from other state regulatory commissions provide context for the
7 ROE requested by AEP Ohio in this case while also illustrating a national customer's
8 perspective on industry trends in authorized ROE.

9
10 ***E. Recommendation***

11 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION IN REGARDS TO**
12 **THE COMPANY'S PROPOSED ROE?**

13 A. The Commission should reject the Company's proposed increase in ROE and instead
14 award an ROE of no higher than 9.70 percent, which is the Company's currently
15 authorized ROE, in light of the following factors:

- 16 1. The impact of the resulting rates on customers, particularly increases in the DIR;
17 2. The Company's reduced exposure to risk from regulatory lag because of the
18 proposed DIR and the other proposed and existing riders;
19 3. Recent ROEs approved by the Commission; and
20 4. ROEs approved by other commissions since 2019.

V. AEP Ohio's Proposed Flotation Cost Recovery

Q. WHAT ARE FLOTATION COSTS?

A. Flotation costs are costs associated with the sale of new issuances of securities. These costs include tangible costs, including issuance, and intangible costs like market pressure and market break. See David C. Parcell, *The Cost of Capital – A Practitioner's Guide*, page 187 to page 189 (2010 Edition).

Q. PLEASE DESCRIBE THE COMPANY'S PROPOSED FLOTATION COST RECOVERY IN THIS CASE.

A. My understanding is that the Company is proposing a ten-basis point increase in the Company's proposed cost of equity to account for flotation costs. See Direct Testimony of Adrien M. McKenzie, Exhibit AMM-2, page 1.

Q. DOES THE COMPANY INCUR FLOTATION COSTS?

A. No, as the Company is not publicly traded, it does not incur flotation costs. Only its corporate parent, American Electric Power, could incur potential flotation costs.

Q. IF AEP OHIO IS NOT PUBLICLY TRADED, HOW DOES IT JUSTIFY ITS REQUEST FOR A FLOTATION ADJUSTMENT COST?

A. The Company calculates a proxy group average flotation cost percentage to the proxy group's dividend yield. See *id.*, page 51, line 12 to line 20. Thus, it appears that AEP Ohio is relying on purported flotation costs incurred by the proxy group.

1 **Q. DOES THE COMPANY MENTION ANY SPECIFIC CURRENT OR PROPOSED EQUITY**
2 **RAISES FROM EITHER AEP OHIO OR AMERICAN ELECTRIC POWER RELATED TO THE**
3 **COMPANY'S PROPOSED ESP V?**

4 A. No, it does not. There is nothing to suggest that AEP Ohio (or its parent) will actually
5 incur flotation costs during the ESP V period. As such, there is nothing known and
6 measurable to justify the Company's flotation cost ask.

7 **Q. DOES THE COMPANY HAVE OTHER CHOICES ASIDE FROM RAISING EQUITY TO**
8 **COVER ITS FLOTATION COSTS ASSOCIATED WITH POTENTIAL FUTURE EQUITY**
9 **RAISES?**

10 A. Yes, it does. For example, the Company could utilize retained earnings from either
11 AEP Ohio or its parent company, American Electric Power, through an equity infusion
12 into AEP Ohio Company.

13 **Q. WHAT IS WALMART'S RECOMMENDATION ON THE PROPOSED FLOTATION COST**
14 **ADJUSTMENT?**

15 A. Walmart generally opposes the inclusion of a flotation cost adjustment; however, to
16 the extent the Commission would ever entertain an upward adjustment in the ROE
17 based on the concept of flotation costs, it should only occur in situations where there
18 are known and measurable costs incurred (or expect to be incurred) by the utility for
19 such equity raises. Here, the Company offers no evidence of actual or projected costs
20 incurred to justify their request for an increase in the ROE. Accordingly, and for the
21 purposes of this docket, Walmart recommends rejecting the Company's request for
22 recovery of equity flotation costs.

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

2 A. Yes.

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Power Company for Authority to Establish a)	
Standard Service Offer Pursuant to R.C.)	Case No. 23-0023-EL-SSO
4928.143, in the Form of an Electric Security Plan)	

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Company for Approval of Certain Accounting)	
Authority)	Case No. 23-0024-EL-AAM

EXHIBITS OF

ALEX J. KRONAUER

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EXHIBIT AJK-1 OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

Alex J. Kronauer

Senior Manager, Energy Services
Walmart Stores, Inc.
Business Address: 2608 SE J Street, Bentonville, Arkansas 72716
Business Phone: (312) 231-6667

INDUSTRY EXPERIENCE

August 2019 – Present
Walmart Inc., Bentonville, AR
Senior Manager, Energy Services

Feb 2023 - Present
Member, Cost Allocation Mechanism Group, Pacific Gas & Electric

September 2022 - Present
Arizona Independent Scheduling Administrator Association (AZISA)
Member, End Use Customers

May 2014 – July 2019
CyrusOne, Dallas, TX
Senior Financial Analyst

November 2012 – April 2014
CyrusOne, Dallas, TX
Financial Analyst

July 2011 – October 2012
TXU Energy (now Vistra Corporation), Irving, TX
Senior Financial Analyst

EDUCATION

2011	University of Texas at Austin, McCombs School of Business	MBA
2005	Colby College	B.A., Economics

INDUSTRY TRAINING

Earned the CRRA (Certified Rate of Return Analyst) designation, May 2022

Passed the Chartered Financial Analyst (CFA) level I exam

TESTIMONY BEFORE REGULATORY COMMISSIONS

2023

Illinois Commerce Commission Docket No. 22-0486, Commonwealth Edison Company Order Requiring Commonwealth Edison Company to file an Initial Multi-Year Integrated Grid Plan and

Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the Public Utilities Act and Docket No. 23-0055, Commonwealth Edison Company Petition for Approval of a Multi-Year Rate Plan under Section 16-108.18 of the Public Utilities Act.

Illinois Commerce Commission Docket No. 22-0487, Ameren Illinois Company d/b/a Ameren Illinois Order Requiring Ameren Illinois Company to file an Initial Multi-Year Integrated Grid Plan and Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the Public Utilities Act and Docket No. 23-0082, Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18

Colorado Public Utilities Commission Docket No. 22AL-0530E: In the Matter of Advice Letter No. 1906 — Electric of Public Service Company of Colorado to Revise its Colorado PUC No. 8 — Electric Tariff To Revise Jurisdictional Base Rate Revenues, Implement New Base Rates for all Electric Rate Schedules, and Make Other Proposed Tariff Changes Effective December 31, 2022

Illinois Commerce Commission Docket No. 23-0067, Ameren Illinois Company d/b/a Ameren Illinois Proposed General Increase in Rates and Revisions to other Terms and Conditions of Service. (Tariff filed January 6, 2023)

Illinois Commerce Commission Docket No. 23-0066, Northern Illinois Gas Company d/b/a Nicor Gas Company Proposed General Increase in Rates and Revisions to other Terms and Conditions of Service. (Tariff filed January 3, 2023)

Public Service Commission of the State of North Dakota Case No. PU-22-194, Montana-Dakota Utilities Co. 2022 Electric Rate Increase Application

Indiana Utility Regulatory Commission Cause No. 45772: Petition Of Northern Indiana Public Service Company LLC Pursuant To Ind. Code §§ 8-1-2-42.7, 8-1-2-61, And, 8-1-2.5-6 For (1) Authority To Modify Its Retail Rates And Charges For Electric Utility Service Through A Phase In Of Rates; (2) Approval Of New Schedules Of Rates And Charges, General Rules And Regulations, And Riders (Both Existing And New); (3) Approval Of A New Rider For Variable Nonlabor O&M Expenses Associated With Coal-fired Generation; (4) Modification Of The Fuel Cost Adjustment To Pass Back 100% Of Off-System Sales Revenues Net Of Expenses; (5) Approval Of Revised Common And Electric Depreciation Rates Applicable To Its Electric Plant In Service; (6) Approval Of Necessary And Appropriate Accounting Relief, Including But Not Limited To Approval Of (A) Certain Deferral Mechanisms For Pension And Other Postretirement Benefits Expenses; (B) Approval Of Regulatory Accounting For Actual Costs Of Removal Associated With Coal Units Following The Retirement Of Michigan City Unit 12, And (C) A Modification Of Joint Venture Accounting Authority To Combine Reserve Accounts For Purposes Of Passing Back Joint Venture Cash, (7) Approval Of Alternative Regulatory Plans For The (A) Modification Of Its Industrial Service Structure, And (B) Implementation Of A Low Income Program; And (8) Review And Determination Of NIPSCO's Earnings Bank For Purposes Of Ind. Code § 8-1-2-42.3.

2022

Public Service Commission of the State of Montana Docket No. 2022.07.078: In the Matter of Northwestern Energy's Application for Authority to Increase Retail Electric and Natural Gas Utility Service Rates and for Approval of Electric and Natural Gas Service Schedules and Rules and Allocated Cost of Service and Rate Design

Public Utilities Regulatory Authority of Connecticut Docket No. 22-08-08: Application of the United Illuminating Company to Amend its Rate Schedules

Public Service Commission of the State of Wyoming Docket No. 20003-214-ER-22 (Record No. 17072): In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy for a General Rate Increase of \$15,366,026 per Annum and Authority to Revise its Power Cost Adjustment Mechanism

Public Utility Commission of Texas Docket No. 53719/SOAH Docket No. 473-22-04394: Application of Entergy Texas, Inc. for Authority to Change Rates.

New York Public Service Commission Case No. 22-E-0317: 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. 22-G-0318: 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. 22-E-0319: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Rochester Gas And Electric Corporation For Electric Service.

New York Public Service Commission Case No. 22-G-0320: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Rochester Gas And Electric Corporation For Gas Service.

Public Service Commission of Wisconsin Docket No. 6690-UR-127, Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Public Service Commission of Wisconsin Docket No. 5-UR-110, Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas and Steam Rates.

Public Utilities Commission of Texas Docket No. 53601/SOAH Docket No. 473-22-2695: Application of Oncor Electric Delivery Company LLC for Authority to Change Rates.

Maryland Public Service Commission Docket No. 9681: In the Matter of the Application of Delmarva Power & Light Company for Electric Multi-Year Plan

California Public Utilities Commission Docket No. A.22-04-008: Application of Pacific Gas and Electric Company for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism (U39M).

California Public Utilities Commission Docket No. A.22-04-009: Application of Southern California Edison Company (U 338-E) for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism.

California Public Utilities Commission Docket No. A.22-04-012: Application of San Diego Gas & Electric Company (U 902M) for Authority to Establish Its Authorized Cost of Capital for Utility Operations for 2023 and to Reset the Cost of Capital Adjustment Mechanism.

Washington Utilities and Transportation Commission Docket Nos. UE220066 and UG-220067 for Puget Sound Energy: General Rate Case to Update Electric Base Rate to Recover Increased Electric Revenue Requirements and General Rate Case to Update Natural Gas Base Rate to Recover Increase Natural Gas Revenue Requirements.

Oregon Public Utility Commission Case No. UE-399: In the Matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision.

New York Public Service Commission Case No. 22-00217/22-E-0064: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Consolidated Edison Company Of New York, Inc. For Electric Service.

New York Public Service Commission Case No. 22-00218/22-G-0065: Proceeding On Motion Of The Commission As To The Rates, Charges, Rules, And Regulations Of Consolidated Edison Company Of New York, Inc. For Gas Service.

2021

Maryland Public Service Commission Docket No. 9670: In the Matter of the Application of Delmarva Power & Light Company for Adjustments to its Retail Rates

Colorado Public Utilities Commission Docket No. 21AL-0317E: In the Matter of Advice Letter No. 1857 — Electric Filed By Public Service Company of Colorado to Revise its Colorado PUC No. 8 — Electric To Revise Jurisdictional Base Rate Revenues, Implement New Base Rates for all Electric Rate Schedules, and Make Other Proposed Tariff Changes Effective August 2, 2021

Public Utility Commission of Texas Docket No. 52195/SOAH Docket No. 473-21-2606: Application of El Paso Electric Company to Change Rates

Public Utility Commission of Texas Docket No. 52397/SOAH Docket No. 473-21-3114: Application of Southwestern Electric Power Company to Implement a Net Interim Fuel Surcharge

Public Utilities Commission of Ohio Case No. 20-1651-EL-AIR: In the Matter of the Application of The Dayton Power and Light Company to Increase its Rates for Electric Distribution, Case No. 20-1652-EL-AAM: In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority, and Case No. 20-1653-EL-ATA: In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.

Public Utility Commission of Texas Docket No. 51802/SOAH Docket No. 473-21-0478: Application of Southwestern Public Service Company for Authority to Changes Rates.

Pennsylvania Public Utility Commission Docket No. R-2021-3024601: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division.

New Mexico Public Regulation Commission Case No. 20-00238-UT: In the Matter of Southwestern Public Service Company's Application for: (1) Revision of its Retail Rates under Advice Notice No. 292; (2) Authorization and Approval to Abandon its Plant X Unit 3 Generating Station; and (3) other Associated Relief.

Colorado Public Utilities Commission Docket No. 20AL-0432E: In the Matter of Advice No. 1835-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8 – Electric Tariff to Eliminate the Currently Effective General Rate Schedule Adjustments to Place into Effect Revised Base Rates and other Phase II Tariff Proposals to Become Effective November 19 2020.

Public Utility Commission of Texas Docket No. 51547: Joint Report and Application of Texas-New Mexico Power Company, NM Green Holdings, Inc., and Avangrid, Inc. for Regulatory Approvals Under PURA §§ 14.101, 39.262 AND 39.915.

2020

New York Public Service Public Service Commission Case No. 20-E-0380: Proceeding on motion of the Commission as to the rates, charges, rules, and regulations of Niagara Mohawk Power Corporation d/b/a National Grid for electric service.

Maryland Public Service Commission Docket No. 9645: In the matter of the application of Baltimore Gas and Electric Company for an electric and gas multi-year plan.

Washington Utilities and Transportation Commission Docket UE-191024: In the matter of PacifiCorp for adjustments to its retail rates for electric energy.

Maryland Public Service Commission Docket No. 9630: In the matter of the application of Delmarva Power & Light Company for adjustments to its retail rates for the distribution of electric energy.

Arkansas Public Service Commission Docket No. 20-027-U. Issue: Demand Response participation.

2019

Arkansas Public Service Commission Docket No. 16-027. Issue: Net Metering Implementation.

KEY ACCOMPLISHMENTS

Created and maintained a Rate Monitor tool to assist Walmart's financial planning and analysis (FP&A) team with budgeting and forecasting. Scanned state PSC websites for potential rate changes and quantified rate change impacts by location by month from general rate cases, fuel adjustments, riders, and other items.

Analyzed, pitched, and secured executive approval for CyrusOne's first green energy commitment through a municipal utility. December 2018.

Implemented demand response program utilizing CyrusOne's backup generators, resulting in \$2.5mm of savings over 4 years (2015-2019). Demonstrated and ensured regulatory compliance.

Researched utility tariffs and coordinated with power utilities, contractors, and CyrusOne's commissioning teams to save over \$11mm over 3 years by minimizing utility ratchets and peak demand charges.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Authority to Establish a)	
Standard Service Offer Pursuant to R.C.)	Case No. 23-0023-EL-SSO
4928.143, in the Form of an Electric Security Plan)	

In the Matter of the Application of Ohio Power)	
Company for Approval of Certain Accounting)	
Authority)	Case No. 23-0024-EL-AAM

EXHIBIT AJK-2 OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

Calculations of Various Weighted Average Costs of Capital Using Proposed and Historic ROEs
--

	Ratio	Cost Rate	Weighted Cost Rate
1 Long-Term Debt	45.57%	4.40%	2.01%
2 Equity with Proposed ROE	54.43%	10.65%	5.80%
3 Total			7.80%

	Ratio	Cost Rate	Weighted Cost Rate
4 Long-Term Debt	45.57%	4.40%	2.01%
5 Equity with Current ROE	54.43%	9.70%	5.28%
6 Total			7.28%

	Ratio	Cost Rate	Weighted Cost Rate
7 Long-Term Debt	45.57%	4.40%	2.01%
8 Equity with Dist. Avg. ROE	54.43%	9.14%	4.98%
9 Total			6.98%

Source: CMM-1, AJK-4

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Authority to Establish a)	
Standard Service Offer Pursuant to R.C.)	Case No. 23-0023-EL-SSO
4928.143, in the Form of an Electric Security Plan)	

In the Matter of the Application of Ohio Power)	
Company for Approval of Certain Accounting)	
Authority)	Case No. 23-0024-EL-AAM

EXHIBIT AJK-3 OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

DIR Capital Cost Impact under AEP Ohio Proposed and Historic Weighted Average Costs of Capital
--

DIR WACC Analysis

Line Item	Source	2024	2025	2026	2027	2028	2029	2030	Total
1 Year DIR Capital	RJF-9	\$ 328,363,000	\$ 576,202,000	\$ 612,527,000	\$ 645,319,000	\$ 666,051,000	\$ 723,627,000	\$ 310,556,000	
2 Cumulative DIR Capital		\$ 328,363,000	\$ 904,565,000	\$ 1,517,092,000	\$ 2,162,411,000	\$ 2,828,462,000	\$ 3,552,089,000	\$ 3,862,645,000	
								\$ 301,358,735	
3 WACC with Proposed ROE	AJK-2, Line 3	7.80%	7.80%	7.80%	7.80%	7.80%	7.80%	7.80%	7.80%
4 Net Operating Income for DIR Capital at Proposed R	2 x 3	\$ 25,618,471	\$ 70,573,031	\$ 118,361,621	\$ 168,708,603	\$ 220,673,070	\$ 277,129,544	\$ 301,358,735	\$ 1,182,423,074
5 WACC with Current ROE	AJK-2, Line 6	7.28%	7.28%	7.28%	7.28%	7.28%	7.28%	7.28%	7.28%
6 Net Operating Income for DIR Capital at Current ROI	2 x 5	\$ 23,920,555	\$ 65,895,661	\$ 110,516,966	\$ 157,527,100	\$ 206,047,517	\$ 258,762,224	\$ 281,385,577	\$ 1,104,055,600
7 Proposed vs. Current ROE Impact	4 - 6	\$ 1,697,916	\$ 4,677,370	\$ 7,844,655	\$ 11,181,503	\$ 14,625,553	\$ 18,367,319	\$ 19,973,158	\$ 78,367,474
8 WACC with Dist Avg ROE	AJK-2, Line 9	6.98%	6.98%	6.98%	6.98%	6.98%	6.98%	6.98%	6.98%
9 Net Operating Income for DIR Capital at Dist. Avg. R	2 x 8	\$ 22,920,094	\$ 63,139,619	\$ 105,894,669	\$ 150,938,636	\$ 197,429,719	\$ 247,939,669	\$ 269,616,815	\$ 1,057,879,221
10 Proposed vs. Dist. Avg. ROE Impact	4 - 9	\$ 2,698,377	\$ 7,433,411	\$ 12,466,953	\$ 17,769,967	\$ 23,243,351	\$ 29,189,875	\$ 31,741,919	\$ 124,543,853

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

**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)**

Case No. 23-0023-EL-SSO

**In the Matter of the Application of Ohio Power)
Company for Approval of Certain Accounting)
Authority)**

Case No. 23-0024-EL-AAM

EXHIBIT AJK-4 OF

ALEX J. KRONAUER

ON BEHALF OF

WALMART INC.

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
								(8) - (5)					(8) x (13)
Michigan	Consumers Energy Co.	CMS	U-20134	10.75%	1/9/2019	V	10.00%	(75)	Y	Settled	N/A	N/A	N/A
West Virginia	Appalachian Power Co.	AEP	18-0646-E-42T	10.22%	2/27/2019	V	9.75%	(47)	Y	Settled	7.28%	50.16%	4.89%
New Jersey	Atlantic City Electric Co.	EXC	ER18080925	10.10%	3/13/2019	D	9.60%	(50)	N	Settled	7.08%	49.94%	4.79%
New York	Orange & Rockland Utilities Inc.	ED	18-E-0067	9.75%	3/14/2019	D	9.00%	(75)	Y	Settled	6.97%	48.00%	4.32%
Oklahoma	Public Service Company of OK	AEP	PUD201800097	10.30%	3/14/2019	V	9.40%	(90)	Y	Settled	6.97%	N/A	N/A
Maryland	Potomac Edison Co.	FE	9490	10.80%	3/22/2019	D	9.65%	(115)	N	Fully Litigated	7.15%	52.82%	5.10%
Kentucky	Kentucky Utilities Co.	PPL	2018-00294	10.42%	4/30/2019	V	9.73%	(69)	N	Settled	N/A	N/A	N/A
Kentucky	Louisville Gas & Electric Co.	PPL	2018-00295	10.42%	4/30/2019	V	9.73%	(69)	N	Settled	N/A	N/A	N/A
South Carolina	Duke Energy Carolinas LLC	DUL	2018-319-E	10.50%	5/1/2019	V	9.50%	(100)	N	Fully Litigated	7.16%	53.00%	5.04%
Michigan	DTE Electric Co.	DTE	U-20162	10.50%	5/2/2019	V	10.00%	(50)	Y	Fully Litigated	5.48%	37.94%	3.79%
South Carolina	Duke Energy Progress LLC	DUK	2018-318-E	10.50%	5/8/2019	V	9.50%	(100)	Y	Fully Litigated	6.99%	53.00%	5.04%
South Dakota	Otter Tail Power Co.	OTTR	EL18-021	10.30%	5/14/2019	V	8.75%	(155)	N	Fully Litigated	7.09%	52.92%	4.63%
Hawaii	Maui Electric Company Ltd	HE	2017-0150	10.60%	5/16/2019	V	9.50%	(110)	N	Settled	7.43%	57.02%	5.42%
Michigan	Upper Peninsula Power Co.		U-20276	10.50%	5/23/2019	V	9.90%	(60)	N	Settled	6.91%	N/A	N/A
Maryland	Potomac Electric Power Co.	EXC	9602	10.30%	8/12/2019	D	9.60%	(70)	N	Fully Litigated	7.45%	50.46%	4.84%
Vermont	Green Mountain Power Corp.		19-1932-TF	9.16%	8/29/2019	V	9.06%	(10)	N	Fully Litigated	6.85%	49.46%	4.48%
Wisconsin	Northern States Power Co - WI	XEL	4220-UR-124	N/A Ω	9/4/2019	V	10.00%	N/A	Y	Settled	7.74%	52.52%	5.25%
Massachusetts	Massachusetts Electric Co.	NG	DPU-18-150	10.50%	9/30/2019	D	9.60%	(90)	N	Fully Litigated	7.56%	53.49%	5.14%
Montana	Northwestern Corp.	NWE	D2018.2.12	10.65%	10/29/2019	V	9.65%	(100)	N	Settled	6.92%	49.38%	4.77%
Wisconsin	Wisconsin Electric Power Co.	WEC	05-UR-109	10.35%	10/31/2019	V	10.00%	(35)	Y	Settled	7.49%	54.46%	5.45%
Wisconsin	Wisconsin Public Service Corp.	WEC	6690-UR-126	10.35%	10/31/2019	V	10.00%	(35)	Y	Settled	7.22%	51.96%	5.20%
Louisiana	Entergy New Orleans LLC	ETR	UD-18-07	10.50%	11/7/2019	V	9.35%	(115)	Y	Fully Litigated	7.09%	50.00%	4.68%
Idaho	Avista Corp.	AVA	AVU-E-19-04	9.90%	11/29/2019	V	9.50%	(40)	N	Settled	7.35%	50.00%	4.75%
Illinois	Commonwealth Edison Co.	EXC	19-0387	8.91%	12/4/2019	D	8.91%	-	N	Fully Litigated	6.51%	47.97%	4.27%
Indiana	Northern Indiana Public Service Co.	NI	45159	10.80%	12/4/2019	V	9.75%	(105)	N	Settled	6.52%	47.86%	4.67%
Illinois	Ameren Illinois	AEE	19-0436	8.91%	12/16/2019	D	8.91%	-	Y	Fully Litigated	6.71%	50.00%	4.46%
Georgia	Georgia Power Co.	SO	42516	10.90%	12/17/2019	V	10.50%	(40)	Y	Fully Litigated	N/A	56.00%	5.88%
Maryland	Baltimore Gas and Electric Co.	EXC	9610	10.30%	12/17/2019	D	9.70%	(60)	N	Settled	6.94%	N/A	N/A
California	Pacific Gas & Electric Co.	PCG	A-19-04-015	12.00%	12/19/2019	V	10.25%	(175)	N	Fully Litigated	7.81%	52.00%	5.33%
California	San Diego Gas & Electric Co.	SRE	A-19-04-017	12.38%	12/19/2019	V	10.20%	(218)	Y	Fully Litigated	7.55%	52.00%	5.30%
California	Southern California Edison Co.	EIX	A-19-04-014	11.45%	12/19/2019	V	10.30%	(115)	N	Fully Litigated	7.68%	52.00%	5.36%
Arkansas	Southwestern Electric Power Co.	AEP	19-008-U	10.50%	12/20/2019	V	9.45%	(105)	Y	Settled	4.93%	33.71%	3.19%
Nevada	Sierra Pacific Power Co.	BRK.A	19-06002	10.21%	12/24/2019	V	9.50%	(71)	N	Settled	6.75%	50.92%	4.84%
Iowa	Interstate Power & Light Co.	LNT	RPU-2019-0001	10.25% ¥	1/8/2020	V	10.02% ¥	(23)	Y	Settled	7.23%	51.00%	5.11%
New York	Consolidated Edison Co. of NY	ED	19-E-0065	9.75%	1/16/2020	D	8.80%	(95)	Y	Settled	6.61%	48.00%	4.22%
New Jersey	Rockland Electric Company	ED	ER19050552	9.60%	1/22/2020	D	9.50%	(10)	Y	Settled	7.11%	48.32%	4.59%
Michigan	Indiana Michigan Power Co.	AEP	U-20359	10.50%	1/23/2020	V	9.86%	(64)	Y	Settled	6.08%	46.56%	4.59%
California	PacificCorp	BRK.A	A-18-04-002	10.60%	2/6/2020	V	10.00%	(60)	N	Fully Litigated	N/A	51.96%	5.20%
Colorado	Public Service Company of Colorado	XEL	19AL-0268E	10.20%	2/11/2020	V	9.30%	(90)	Y	Fully Litigated	6.97%	55.61%	5.17%
Texas	Centerpoint Energy	CNP	49421	10.40%	2/14/2020	D	9.40%	(100)	N	Settled	6.51%	42.50%	4.00%
Maine	Central Maine Power Co.	IBE	2018-00194	10.00%	2/19/2020	D	8.25%	(175)	N	Fully Litigated	6.30%	50.00%	4.13%
North Carolina	Virginia Electric & Power Co.	D	E-22 Sub 562	10.75%	2/24/2020	V	9.75%	(100)	Y	Settled	7.20%	52.00%	5.07%

Walmart, Inc.
Exhibit AJK-4
Ohio Case Nos. 23-0023-EL-SSO and 23-0024-EL-AAM
Page 2 of 5

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(10)	(11)	(12)	(13)	(14) (8) x (13)
Texas	AEP Texas Inc.	AEP	49494	10.50%	2/27/2020	D	9.40%	(110)	Y	Settled	6.45%	42.50%	4.00%
Indiana	Indiana Michigan Power Co.	AEP	45235	10.50%	3/11/2020	V	9.70%	(80)	Y	Fully Litigated	5.61%	37.55%	3.64%
Washington	Avista Corp.	AVA	UE-190334	9.90%	3/25/2020	V	9.40%	(50)	N	Settled	7.21%	48.50%	4.56%
Massachusetts	Fitchburg Gas & Electric Light	UTL	DPU 19-130	10.50%	4/17/2020	D	9.70%	(80)	N	Settled	7.99%	52.45%	5.09%
Kentucky	Duke Energy Kentucky Inc.	DUK	2019-00271	9.80%	4/27/2020	V	9.25%	(55)	Y	Fully Litigated	6.41%	48.23%	4.46%
Michigan	DTE Electric Co.	DTE	U-20561	10.50%	5/8/2020	V	9.90%	(60)	Y	Fully Litigated	5.46%	38.32%	3.79%
New Mexico	Southwestern Public Service Co	XEL	19-00170-UT	10.10%	5/20/2020	V	9.45%	(65)	Y	Settled	7.19%	54.77%	5.18%
Indiana	Duke Energy Indiana, LLC	DUK	45253	10.40%	6/29/2020	V	9.70%	(70)	Y	Fully Litigated	5.71%	40.98%	3.98%
New Hampshire	Liberty Utilities Granite St	AQN	DE-19-064	10.00%	6/30/2020	D	9.10%	(90)	N	Settled	7.60%	52.00%	4.73%
Missouri	Empire District Electric Co.	AQN	ER-2019-0374	9.95%	7/1/2020	V	9.25%	(70)	N	Settled	6.77%	46.00%	4.26%
Washington	Puget Sound Energy Inc.		UE-190529	9.50%	7/8/2020	V	9.40%	(10)	N	Fully Litigated	7.39%	48.50%	4.56%
Maryland	Delmarva Power & Light Co.	EXC	9630	10.30%	7/14/2020	D	9.60%	(70)	N	Fully Litigated	6.84%	50.53%	4.85%
Hawaii	Hawaii Electric Light Co	HE	2018-0368	10.50%	7/28/2020	V	9.50%	(100)	N	Settled	7.52%	56.83%	5.40%
California	Liberty Utilities (CalPeco Electric)	AQN	A-18-12-001	10.30%	8/27/2020	V	10.00%	(30)	N	Fully Litigated	7.63%	52.50%	5.25%
Vermont	Green Mountain Power Corp.		20-1407-TF	8.20%	8/27/2020	V	8.20%	-	N	Fully Litigated	6.43%	49.87%	4.09%
Texas	Southwestern Public Service Co	XEL	49831	10.10%	8/27/2020	V	9.45%	(65)	Y	Settled	7.13%	54.62%	5.16%
Hawaii	Hawaiian Electric Co.	HE	2019-0085	10.50%	10/22/2020	V	9.50%	(100)	N	Settled	7.37%	56.83%	5.40%
New Jersey	Jersey Central Power & Light Co.	FE	ER20020146	10.15%	10/28/2020	D	9.60%	(55)	N	Settled	7.40%	51.44%	4.94%
New York	NY State Electric & Gas Corp	IBE	19-E-0378	9.50%	11/19/2020	D	8.80%	(70)	N	Settled	6.10%	48.00%	4.22%
New York	Rochester Gas & Electric Corp	IBE	19-E-0380	9.50%	11/19/2020	D	8.80%	(70)	N	Settled	6.62%	48.00%	4.22%
Virginia	Appalachian Power Co.	AEP	PUR-2020-00015	9.90%	11/24/2020	V	9.20%	(70)	Y	Fully Litigated	N/A	N/A	N/A
Wisconsin	Madison Gas and Electric Co.	MGE	3270-UR-123 (Elec)	9.80%	11/24/2020	V	9.80%	-	N	Settled	6.95%	55.00%	5.39%
Illinois	Ameren Illinois	AEE	20-0381	8.38%	12/9/2020	D	8.38%	-	Y	Fully Litigated	6.39%	50.00%	4.19%
Illinois	Commonwealth Edison Co.	EXC	20-0393	8.38%	12/9/2020	D	8.38%	-	N	Fully Litigated	6.28%	48.16%	4.04%
Nevada	Nevada Power Co.	BRK.A	20-06003	10.08%	12/10/2020	V	9.40%	(68)	N	Settled	7.14%	N/A	N/A
Washington	PacifiCorp	BRK.A	UE-191024	10.20%	12/14/2020	V	9.50%	(70)	N	Settled	7.17%	49.10%	4.66%
New Hampshire	Public Service Co. of NH	ES	DE-19-057	10.40%	12/15/2020	D	9.30%	(110)	Y	Settled	6.87%	54.40%	5.06%
Maryland	Baltimore Gas and Electric Co.	EXC	9645	10.10%	12/16/2020	D	9.50%	(60)	N	Fully Litigated	6.75%	52.00%	4.94%
Michigan	Consumers Energy Co.	CMS	U-20697	10.50%	12/17/2020	V	9.90%	(60)	Y	Fully Litigated	5.67%	N/A	N/A
Oregon	PacifiCorp	BRK.A	UE 374	9.80%	12/18/2020	V	9.50%	(30)	N	Fully Litigated	7.14%	50.00%	4.75%
Arizona	Tucson Electric Power Co.	FTS	E-1933A-19-0028	10.00%	12/22/2020	V	9.15%	(85)	N	Fully Litigated	7.04%	53.08%	4.86%
Wisconsin	Wisconsin Power and Light Co	LNT	6680-UR-122 (Elec)	N/A	12/23/2020	V	10.00%	N/A	Y	Fully Litigated	7.26%	52.53%	5.25%
Utah	PacifiCorp	BRK.A	20-035-04	9.80%	12/30/2020	V	9.65%	(15)	N	Fully Litigated	7.34%	52.50%	5.07%
Kentucky	Kentucky Power Co.	AEP	C-2020-00174	10.00%	1/13/2021	V	9.30%	(70)	Y	Fully Litigated	6.19%	43.25%	4.02%
North Carolina	Duke Energy Carolinas LLC	DUK	D-E-7, Sub 1214	10.50% μ	3/31/2021	V	9.60%	(90)	Y	Settled	7.04%	52.00%	4.99%
North Carolina	Duke Energy Progress LLC	DUK	D-E-2, Sub 1219	10.50% μ	4/16/2021	V	9.60%	(90)	Y	Settled	6.92%	52.00%	4.99%
Florida	Duke Energy Florida LLC	DUK	D-20210016-EI	9.85%	5/4/2021	V	9.85%	-	Y	Settled	N/A	N/A	N/A
Wyoming	PacifiCorp	BRK.A	20000-578-ER-20	9.80%	5/18/2021	V	9.50%	(30)	N	Fully Litigated	7.19%	51.00%	4.85%
District of Columbia	Potomac Electric	EXC	FC-1156	9.70%	6/4/2021	D	9.28%	(42)	N	Fully Litigated	7.17%	50.68%	4.70%
Maryland	Potomac Electric Power Co.	EXC	C-9655	10.20%	6/23/2021	V	9.55%	(65)	N	Fully Litigated	7.21%	50.50%	4.82%
New Mexico	El Paso Electric Co.		C-20-00104-UT	10.30%	6/28/2021	D	9.00%	(130)	N	Fully Litigated	7.18%	49.21%	4.43%
Kentucky	Kentucky Utilities Co.	PPL	C-2020-00349	10.00%	6/30/2021	V	9.43%	(57)	N	Settled	N/A	N/A	N/A

Walmart, Inc.
Exhibit AJK-4
Ohio Case Nos. 23-0023-EL-SSO and 23-0024-EL-AAM
Page 3 of 5

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(10)	(11)	(12)	(13)	(14) (8) x (13)
Kentucky	Louisville Gas & Electric Co.	PPL	C-2020-00350 (elec.)	10.00%	6/30/2021	V	9.43%	(57)	N	Settled	N/A	N/A	N/A
New Jersey	Atlantic City Electric Co.	EXC	D-ER20120746	10.30%	7/14/2021	D	9.60%	(70)	N	Settled	6.99%	50.21%	4.82%
South Carolina	Dominion Energy South Carolina	D	D-2020-125-E	10.25%	7/21/2021	V	9.50%	(75)	Y	Settled	N/A	51.62%	4.90%
Delaware	Delmarva Power & Light Co.	EXC	D-20-0149	10.30%	8/5/2021	D	9.60%	(70)	N	Fully Litigated	6.80%	N/A	N/A
North Dakota	Northern States Power Co.	XEL	C-PU-20-441	10.20%	8/18/2021	V	9.50%	(70)	Y	Settled	6.97%	52.50%	4.99%
Vermont	Green Mountain Power Corp.		21-1963-TF	8.57%	8/31/2021	V	8.57%	-	N	Fully Litigated	6.67%	50.42%	4.32%
Idaho	Avista Corp.	AVA	C-AVU-E-21-01	9.90%	9/1/2021	V	9.40%	(50)	N	Settled	7.05%	50.00%	4.70%
Washington	Avista Corp.	AVA	D-UE-200900	9.90%	9/27/2021	V	9.40%	(50)	N	Settled	7.12%	48.50%	4.56%
Florida	Tampa Electric Co.	EMA	D-20210034-EI	10.75%	10/21/2021	V	9.95%	(80)	N	Settled	6.26%	45.07%	4.48%
Florida	Florida Power & Light Co.	NEE	D-20210015-EI	11.50%	10/26/2021	V	10.60%	(90)	Y	Settled	N/A	N/A	N/A
Maine	Versant Power		D-2020-00316	9.35%	10/28/2021	D	9.35%	-	N	NA	6.57%	49.00%	4.58%
Arizona	Arizona Public Service Co.	PNW	D-E-01345A-19-0236	10.00%	11/2/2021	V	8.70%	(130)	Y	Settled	6.62%	54.67%	4.76%
Minnesota	Otter Tail Power Co.	OTTR	D-E-017/GR-20-719	10.20%	11/4/2021	V	9.48%	(72)	N	Fully Litigated	7.18%	52.50%	4.98%
Ohio	Ohio Power Co.	AEP	C-20-0585-EL-AIR	10.15%	11/17/2021	D	9.70%	(45)	Y	Settled	7.28%	43.43%	4.21%
New York	Central Hudson Gas & Electric	FTS	C-20-E-0428	9.10%	11/18/2021	D	9.00%	(10)	N	Settled	6.48%	50.00%	4.50%
Texas	Southwestern Electric Power Co	AEP	D-51415	10.35%	11/18/2021	V	9.25%	(110)	Y	Fully Litigated	6.69%	49.37%	4.57%
Virginia	Virginia Electric & Power Co.	D	C-PUR-2021-00058	10.80%	11/18/2021	V	9.35%	(145)	Y	Settled	6.92%	51.92%	4.85%
Wisconsin	Madison Gas and Electric Co.	MGEE	D-3270-UR-124 (Elec)	9.80%	11/23/2021	V	9.80%	-	N	Settled	7.18%	55.00%	5.39%
Wisconsin	Northern States Power Co.	XEL	D-4220-UR-125 (Elec)	10.00%	11/18/2021	V	10.00%	-	Y	Settled	7.31%	52.50%	5.25%
Wisconsin	Wisconsin Power and Light Co	LNT	D-6680-UR-123 (Elec)	10.00%	11/18/2021	V	10.00%	-	Y	Settled	7.48%	52.50%	5.25%
Illinois	Commonwealth Edison Co.	EXC	D-21-0367	7.36%	12/1/2021	D	7.36%	-	N	Fully Litigated	5.72%	48.70%	3.58%
Illinois	Ameren Illinois	AEE	D-21-0365	7.36%	12/13/2021	D	7.36%	-	Y	Fully Litigated	5.78%	51.00%	3.75%
New Jersey	Rockland Electric Company	ED	D-ER21050823	10.00%	12/15/2021	D	9.60%	(40)	Y	Settled	7.08%	48.51%	4.66%
Michigan	Consumers Energy Co.	CMS	C-U-20963	10.50%	12/22/2021	V	9.90%	(60)	Y	Fully Litigated	5.62%	41.84%	4.14%
Oklahoma	Public Service Co. of OK	AEP	Ca-PUD202100055	10.00%	12/28/2021	V	9.40%	(60)	Y	Settled	6.74%	N/A	N/A
New York	Niagara Mohawk Power Corp.	NG	C-20-E-0380	9.50%	1/20/2022	D	9.00%	(50)	N	Settled	6.08%	48.00%	4.32%
New Mexico	Southwestern Public Service Co	XEL	C-20-00238-UT	10.35%	2/16/2022	V	9.35%	(100)	Y	Settled	7.07%	54.72%	5.12%
Indiana	Indiana Michigan Power Co.	AEP	Ca-45576	10.00%	2/23/2022	V	9.70%	(30)	Y	Settled	5.78%	40.70%	3.95%
Colorado	Public Service Co. of CO	XEL	D-21AL-0317E	10.00%	3/16/2022	V	9.30%	(70)	Y	Settled	6.82%	55.69%	5.18%
New York	Orange & Rockland Utilts Inc.	ED	C-21-E-0074	9.50%	4/14/2022	D	9.20%	(30)	Y	Settled	6.77%	48.00%	4.42%
New Hampshire	Unitil Energy Systems Inc.	UTL	D-DE-21-030	10.00%	5/12/2022	D	9.20%	(80)	N	Settled	7.42%	50.00%	4.60%
Oregon	Portland General Electric Co.	POR	D-UE-394	9.50%	4/25/2022	V	9.50%	-	Y	Settled	6.81%	52.00%	4.94%
Arkansas	Southwestern Electric Power Co	AEP	D-21-070-U	10.35%	5/23/2022	V	9.50%	(85)	Y	Fully Litigated	4.74%	44.54%	4.23%
Texas	El Paso Electric Co.		D-52195	10.30%	9/15/2022	V	9.35%	(95)	N	Settled	7.50%	51.00%	4.77%
Vermont	Green Mountain Power Corp.		C-22-0175-TF	8.57%	8/31/2022	V	8.57%	-	N	Fully Litigated	6.30%	49.98%	4.28%
Oklahoma	Oklahoma Gas and Electric Co.	OGE	Ca-PUD202100164	10.20%	9/8/2022	V	9.50%	(70)	N	Settled	N/A	53.37%	5.07%
Tennessee	Kingsport Power Company	AEP	D-21-00107	10.20%	10/25/2022	V	9.50%	(70)	Y	Settled	6.02%	48.90%	4.65%
Illinois	Commonwealth Edison Co.	EXC	D-22-0302	7.85%	11/17/2022	D	7.85%	-	N	Fully Litigated	5.94%	49.45%	3.88%
Michigan	DTE Electric Co.	DTE	C-U-20836	10.25%	11/18/2022	V	9.90%	(35)	Y	Fully Litigated	5.42%	39.62%	3.92%
Massachusetts	NSTAR Electric Co.	ES	DPU 22-22	10.50%	11/30/2022	D	9.80%	(70)	Y	Fully Litigated	7.06%	53.21%	5.21%
Illinois	Ameren Illinois	AEE	D-22-0297	7.85%	12/1/2022	D	7.85%	-	Y	Fully Litigated	5.90%	50.00%	3.93%
Maryland	Delmarva Power & Light Co.	EXC	C-9681	10.25%	12/14/2022	D	9.60%	(65)	N	Settled	6.62%	50.50%	4.85%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
								(8) - (5)					(8) x (13)
Ohio	Duke Energy Ohio Inc.	DUK	C-21-0887-EL-AIR	10.30%	12/14/2022	D	9.50%	(80)	Y	Settled	6.86%	50.50%	4.80%
Ohio	The Dayton Power & Light Co.	AES	C-20-1651-EL-AIR	10.50%	12/14/2022	D	10.00%	(50)	N	Fully Litigated	7.43%	53.87%	5.39%
California	Pacific Gas and Electric Co.	PCG	A-22-04-008	11.00%	12/15/2022	V	10.00%	(100)	N	Fully Litigated	7.27%	52.00%	5.20%
California	San Diego Gas & Electric Co.	SRE	A-22-04-012	10.55%	12/15/2022	V	9.95%	(60)	Y	Fully Litigated	7.18%	52.00%	5.17%
California	Southern California Edison Co.	EIX	A-22-04-009	10.53%	12/15/2022	V	10.05%	(48)	N	Fully Litigated	7.44%	52.00%	5.23%
Oregon	PacifiCorp	BRK.A	D-UE-399	9.80%	12/16/2022	V	9.50%	(30)	N	Settled	7.11%	50.00%	4.75%
Georgia	Georgia Power Co.	SO	D-44280	11.00%	12/20/2022	V	10.50%	(50)	Y	Settled	NA	56.00%	5.88%
Wisconsin	Wisconsin Public Service Corp.	WEC	D-6690-UR-127 (Elec)	10.00%	12/22/2022	V	9.80%	(20)	Y	Fully Litigated	N/A	53.00%	5.19%
Washington	Puget Sound Energy Inc.		D-UE-220066	9.90%	12/22/2022	V	9.40%	(50)	N	Settled	7.16%	49.00%	4.61%
Nevada	Sierra Pacific Power Co.	BRK.A	D-22-06014	10.26%	12/27/2022	V	9.56%	(70)	N	Fully Litigated	6.98%	52.40%	5.01%
Wisconsin	Wisconsin Electric Power Co.	WEC	D-5-UR-110 (WEP-Elec)	10.00%	12/29/2022	V	9.80%	(20)	Y	Fully Litigated	N/A	53.00%	5.19%
Oklahoma	Empire District Electric Co.	AQN	Ca-PUD202100163	10.00%	12/29/2022	V	9.30%	(70)	N	Settled	N/A	N/A	N/A
Michigan	Consumers Energy Co.	CMS	C-U-21224	10.25%	1/19/2023	V	9.90%	(35)	Y	Settled	N/A	N/A	N/A
Minnesota	Minnesota Power Entrprs Inc.	ALE	D-E-015/GR-21-335	10.25%	1/23/2023	V	9.65%	(60)	N	Fully Litigated	7.12%	52.50%	5.07%
Wyoming	Cheyenne Light Fuel Power Co.	BKH	D-20003-214-ER-22	10.30%	1/26/2023	V	9.75%	(55)	Y	Settled	7.48%	52.00%	5.07%
South Carolina	Duke Energy Progress LLC	DUK	D-2022-254-E	10.20%	2/9/2023	V	9.60%	(60)	Y	Settled	6.83%	52.43%	5.03%
Louisiana	Southwestern Electric Power Co	AEP	D-U-35441	10.35%	2/17/2023	V	9.50%	(85)	Y	Settled	N/A	N/A	N/A
Texas	Oncor Electric Delivery Co.	SRE	D-53601	10.30%	3/9/2023	D	9.70%	(60)	Y	Fully Litigated	6.65%	42.50%	4.12%
Michigan	Upper Peninsula Power Co.		C-U-21286	10.80%	3/24/2023	V	9.90%	(90)	N	Settled	N/A	N/A	N/A
California	Liberty Utilities (CalPeco Ele	AQN	A-21-05-017	10.50%	4/27/2023	V	10.00%	(50)	N	Settled	N/A	52.50%	N/A

Entire Period

# of Decisions		146											
Average	(All Utilities)		10.09%				9.48%	(62)			6.84%	50.15%	4.70%
Average	(Distribution Only)		9.71%				9.14%	(57)			6.79%	49.46%	4.51%
Average	(Vertically Integrated Only)		10.26%				9.62%	(64)			6.87%	50.41%	4.84%
Median	(All Utilities)		10.22%				9.50%				6.98%	50.53%	4.80%
Maximum	(All Utilities)		12.38%				10.60%				7.99%	57.02%	5.88%
Minimum	(All Utilities)		7.36%				7.36%				4.74%	33.71%	3.19%
Ohio		3	10.32%				9.73%	(58)			7.19%	49.27%	4.80%
Applicant Proxy Group			10.18%				9.56%	(61)			6.65%	49.35%	4.70%
Settled			10.19%				9.55%	(64)			6.95%	50.46%	4.80%
Fully Litigated			9.97%				9.37%	(60)			6.71%	49.73%	4.66%

2019

# of Decisions		33											
Average	(All Utilities)		10.43%				9.64%	(79)			7.02%	50.33%	4.85%
Average	(Distribution Only)		9.95%				9.37%	(58)			7.05%	50.38%	4.70%
Average	(Distribution Only, exc. IL FRP)		10.29%				9.53%	(77)			7.19%	50.94%	4.84%
Average	(Vertically Integrated Only)		10.59%				9.73%	(86)			7.01%	50.32%	4.90%

Reported Authorized Returns on Equity, Electric Utility Rate Cases Completed, 2019 to Present

State	Utility	Parent Company Ticker	Docket	Requested ROE	Order Date	Vertically Integrated (V) / Distribution Only (D)	Approved ROE	Difference	Applicant's Proxy Group (Y/N)	ROE Fully Litigated or Settled	Approved WACC	Approved Equity Ratio	Equity Contribution
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) (8) - (5)	(10)	(11)	(12)	(13)	(14) (8) X (13)
2020													
# of Decisions			42										
Average	(All Utilities)			10.00%			9.39%	(62)			6.82%	49.77%	4.67%
Average	(Distribution Only)			9.83%			9.10%	(73)			6.79%	49.22%	4.48%
Average	(Distribution Only, exc. IL FRP)			10.07%			9.21%	(86)			6.86%	49.24%	4.54%
Average	(Vertically Integrated Only)			10.10%			9.55%	(56)			6.84%	50.12%	4.78%
2021													
# of Decisions			34										
Average	(All Utilities)			9.93%			9.38%	(55)			6.81%	49.93%	4.64%
Average	(Distribution Only)			9.39%			8.99%	(41)			6.71%	48.97%	4.36%
Average	(Distribution Only, exc. IL FRP)			9.90%			9.39%	(51)			6.94%	48.72%	4.56%
Average	(Vertically Integrated Only)			10.15%			9.54%	(60)			6.87%	50.38%	4.78%
2022													
# of Decisions			29										
Average	(All Utilities)			9.97%			9.45%	(52)			6.65%	50.48%	4.78%
Average	(Distribution Only)			9.58%			9.11%	(47)			6.68%	50.39%	4.60%
Average	(Distribution Only, exc. IL FRP)			10.08%			9.47%	(61)			6.89%	50.58%	4.80%
Average	(Vertically Integrated Only)			10.14%			9.60%	(54)			6.64%	50.52%	4.86%
2023													
# of Decisions			8										
Average	(All Utilities)			10.37%			9.75%	(62)			7.02%	50.39%	4.82%
Average	(Distribution Only)			10.30%			9.70%	(60)			6.65%	42.50%	4.12%
Average	(Distribution Only, exc. IL FRP)			10.30%			9.70%	(60)			6.65%	42.50%	4.12%
Average	(Vertically Integrated Only)			10.38%			9.76%	(62)			7.14%	52.36%	5.06%

Source: S&P Global Market Intelligence

Last Updated: 5/28/23

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

¥ Weighted to include ratemaking-principles rate base and ROE

μ S&P incorrectly reports this value as 9.6%

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Direct Testimony and Exhibits of Alex J. Kronauer on behalf of Walmart Inc. was served by electronic mail, upon the following Parties of Record on this 9th day of June, 2023.

/s/ Carrie H. Grundmann

Carrie H. Grundmann (Ohio Bar ID 96138)

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Summary: Testimony Direct Testimony and Exhibits of Alex J. Kronauer on behalf of Walmart Inc. electronically filed by Carrie H. Grundmann on behalf of Walmart Inc..