

Exhibit No.:  
Issue(s): Renewable Energy  
Program  
Witness: Steve W. Chriss  
Sponsoring Party: Midwest Energy  
Consumers Group  
Type of Exhibit: Direct Testimony  
File No.: ER-2018-0145 and  
ER-2018-0146  
Date Testimony Prepared: July 6, 2018

MISSOURI PUBLIC SERVICE COMMISSION

FILE NOS. ER-2018-0145 AND ER-2018-0146

DIRECT TESTIMONY AND EXHIBITS OF

STEVE W. CHRISS

ON BEHALF OF

MIDWEST ENERGY CONSUMERS GROUP

MIECG Exhibit No. 515  
Date 9-25-18 Reporter TT  
File No. ER-2018-0145  
ER-2018-0146

JULY 6, 2018

## **Contents**

|   |    |
|---|----|
| Introduction .....  | 1  |
| Purpose of Testimony and Summary of Recommendations ..... | 6  |
| Renewable Energy Program.....                             | 8  |
| <i>Program Description</i> .....                          | 8  |
| <i>MECG Comments and Recommendations</i> .....            | 13 |
| Table 1. REP Customer Interest. ....                      | 15 |
| Table 2. Participant Allocation, Company Proposed.....    | 15 |
| Table 3. Participant Allocation, MECG Proposed.....       | 16 |

## **Exhibits**

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

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 Walmart Inc.<sup>1</sup> as Director, Energy  
5 and Strategy Analysis.

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

7 A. I am testifying on behalf of the Midwest Energy Consumers Group ("MECG").

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

9 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State  
10 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the  
11 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My  
12 duties included research and analysis on domestic and international energy and  
13 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility  
14 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties  
15 included appearing as a witness for PUC Staff in electric, natural gas, and  
16 telecommunications dockets. I joined the energy department at Walmart in July  
17 2007 as Manager, State Rate Proceedings. I was promoted to Senior Manager,  
18 Energy Regulatory Analysis, in June 2011. I was promoted to my current position in  
19 October, 2016. My Witness Qualifications Statement is attached as Exhibit SWC-1.

---

<sup>1</sup> Effective February 1, 2018, Wal-Mart Stores, Inc. changed its corporate legal name to Walmart Inc.

1       **Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE PUBLIC SERVICE**  
2       **COMMISSION (“COMMISSION”)?**

3       A.    Yes. I submitted testimony in Case Nos. EO-2010-0036, EO-2012-0009, EC-2014-  
4       0224, ER-2014-0258, EA-2016-0208, ER-2016-0023, ER-2016-0179, EA-2016-0358,  
5       EM-2018-0012, and ET-2018-0063.

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

8       A.    Yes. I have submitted testimony in over 180 proceedings before 38 other utility  
9       regulatory commissions. I have also submitted testimony before several Missouri  
10      House and Senate Committees and the Kansas House Standing Committee on  
11      Utilities and Telecommunications. My testimony has addressed topics including, but  
12      not limited to, cost of service and rate design, return on equity (“ROE”), revenue  
13      requirements, ratemaking policy, large customer renewable programs, qualifying  
14      facility rates, telecommunications deregulation, resource certification, energy  
15      efficiency/demand side management, fuel cost adjustment mechanisms, decoupling,  
16      and the collection of cash earnings on construction work in progress (“CWIP”).

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

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

19      **Q.    PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN MISSOURI.**

20      A.    As shown on Walmart’s website, Walmart operates 157 retail units and four  
21      distribution centers and employs over 42,000 associates in Missouri. In fiscal year

1 ending 2017, Walmart purchased \$7.3 billion worth of goods and services from  
2 Missouri-based suppliers, supporting over 59,000 supplier jobs.<sup>2</sup>

3 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE COMPANY'S**  
4 **SERVICE TERRITORY.**

5 A. Walmart has 26 stores, two distribution centers, and related facilities that take  
6 electric service from Kansas City Power & Light Company ("KCP&L") and KCP&L-  
7 Greater Missouri Operations Company ("GMO") (collectively "the Company") in  
8 Missouri.

9 **Q. HAS WALMART ESTABLISHED CORPORATE RENEWABLE ENERGY GOALS?**

10 A. Yes. Walmart has established aggressive and significant company-wide renewable  
11 energy goals, including: (1) to be supplied 50 percent by renewable energy by 2025,  
12 and, ultimately (2) to be supplied 100 percent by renewable energy<sup>3</sup>. Additionally,  
13 Walmart has set a science-based target to reduce emissions in our operations by 18  
14 percent by 2025 through the deployment of energy efficiency measures and the  
15 consumption of renewable energy.<sup>4</sup> To date, Walmart has contracted for or  
16 currently takes electricity from one or more renewable resources in 22 states and  
17 Puerto Rico.

---

<sup>2</sup> <http://corporate.walmart.com/our-story/locations/united-states#/united-states/missouri>

<sup>3</sup> <http://corporate.walmart.com/global-responsibility/environmental-sustainability>

<sup>4</sup> <http://news.walmart.com/2016/11/04/walmart-offers-new-vision-for-the-companys-role-in-society>

1       **Q.     IS IT YOUR UNDERSTANDING THAT OTHER MEMBERS OF MECG HAVE CORPORATE**  
2       **RENEWABLE ENERGY OR SUSTAINABILITY GOALS?**

3       A.     Yes. Counsel has informed me that Tyson Foods, Cargill, Owens Corning, General  
4       Mills and Northrop Grumman, as a contractor for the U.S. Army, have indicated that  
5       they have renewable energy or sustainability goals.

6       **Q.     AS AN EXAMPLE OF A CORPORATE CUSTOMER WHO ACTIVELY ENGAGES IN**  
7       **RENEWABLE ENERGY OPPORTUNITIES, CAN YOU PROVIDE INSIGHT TO**  
8       **WALMART'S GENERAL FRAMEWORK FOR RENEWABLE OPPORTUNITIES?**

9       A.     Yes. Walmart's desire for renewable energy resources must be balanced against its  
10      business needs. As a general rule, Walmart does not enter into premium structures  
11      or programs that only result in additional costs to our facilities. Rather, Walmart  
12      seeks renewable energy resources that deliver industry leading cost, including  
13      renewable and project specific attributes such as renewable energy credits ("REC"),  
14      within structures where the value proposition allows the customer to receive any  
15      potential benefits brought about by taking on the risk of being served by that  
16      resource instead of, or in addition to, the otherwise applicable resource portfolio.  
17      Additionally, Walmart does not typically enter into programs with terms in excess of  
18      15 years.

1 Q. WHAT CHANNELS DOES WALMART UTILIZE TO SECURE RENEWABLE ENERGY  
2 RESOURCES?

3 A. To meet our renewable energy goals, Walmart utilizes three primary channels to  
4 secure renewable energy resources:

- 5 • **Contracting for off-site resources:** These products are typically structured to  
6 replace other energy, both physically and on the bill. This mechanism allows  
7 Walmart to leverage its scale to drive the best project economics while  
8 simultaneously minimizing transaction time and costs. To date, we have  
9 primarily contracted for these resources in deregulated markets through Texas  
10 Retail Energy, a competitive electric supplier wholly owned by Walmart that  
11 serves as our electric supplier in most deregulated retail markets, to directly  
12 serve our load.
- 13 • **Contracting for on-site resources:** Walmart contracts for on-site, behind the  
14 meter resources through power purchase agreements (“PPA”) and leases that  
15 allow performance guarantees. These resources replace grid energy and are  
16 priced with the expectation that the operating costs for the site are reduced.
- 17 • **Utility partnerships:** Walmart works with its utility partners to develop useable  
18 commercial and industrial programs and economic structures targeted to  
19 function within the confines of the regulatory compact and with minimal impact  
20 to non-participating customers. When this option is pursued, Walmart works to  
21 ensure that programs it assists to develop can be used by the broader group of

1 large commercial and industrial customers, not merely Walmart. Walmart is  
2 unique in the large commercial space because we have significant in-house rate  
3 and regulatory expertise that we are willing to leverage to create opportunities  
4 to move the entire industry forward. The largest of these partnerships to date  
5 includes the development and participation in Georgia Power's 177 MW  
6 Commercial & Industrial Renewable Energy Development Initiative program<sup>5</sup> and  
7 Alabama Power's 72 MW solar farm in Alabama.<sup>6</sup> While Walmart assisted in  
8 developing both opportunities, the opportunities are open to other interested  
9 large customers, not just Walmart.

10 **Q. DID WALMART DIRECTLY ENGAGE IN THE DEVELOPMENT OF THE STRUCTURE OF**  
11 **THE COMPANY'S RENEWABLE PROPOSALS IN THIS DOCKET?**

12 **A.** No. However, in recent years Walmart has engaged in conceptual conversations  
13 with key KCP&L personnel.

14  
15 **Purpose of Testimony and Summary of Recommendations**

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

17 **A.** The purpose of my testimony is to respond to the Companies' proposed Renewable  
18 Energy Program ("REP").

---

<sup>5</sup> <https://www.greenbiz.com/article/how-google-and-walmart-work-utilities-procure-clean-power>

<sup>6</sup> <http://www.alabamane.wscenter.com/2018/01/02/chambers-county-solar-project-now-serving-alabama-power-customers/>



1 Q. PLEASE SUMMARIZE MECG'S RECOMMENDATION TO THE COMMISSION.

2 A. MECG'S recommendations to the Commission are as follows:

3 1) Overall MECG commends the Company for its efforts to develop the program  
4 and finds the proposed REP to be well structured and likely to produce  
5 customer participation and not harm non-participants. MECG recommends  
6 that the Commission approve the REP with the modifications proposed  
7 herein.

8 2) The first enrollment for a tranche of new resource or set of resources should  
9 utilize a two-step process: (1) as proposed by the Company, the Company  
10 should gauge interest from eligible and interested customers to size the  
11 resource(s) and (2) to the extent that the total of interest exceeds 200 MW,  
12 the Company should then size the allocations to each customer proportional  
13 to their interest.

14 3) MECG recommends that customers who do not receive their full interest in  
15 the first tranche have an opportunity to sign up to their full interest in later  
16 tranches or when another customer's subscription term ends and is not  
17 renewed or is terminated and those MW are freed up. Additionally, MECG  
18 does not oppose the Company utilizing a first-come-first-served process for  
19 subscriptions that occur when another customer's subscription term ends  
20 and is not renewed or is terminated and those MW are freed up.

- 1           4)     The Commission should approve the program with a renewal provision that  
2                   gives the participating customer the option to renew its participation prior to  
3                   offering that capacity to other customers.
- 4           5)     The Commission should approve the program with 5, 10, 15, and 20 year  
5                   terms available to participating customers.
- 6           6)     The Commission should approve the program with more flexible transfer  
7                   terms.  MECG recommends that the Commission apply the transfer terms  
8                   from the recently approved Ameren Missouri renewable choice program to  
9                   the Company's REP.

10

11   **Renewable Energy Program**

12   ***Program Description***

13    **Q.     WHAT IS YOUR UNDERSTANDING OF THE STRUCTURE OF THE COMPANY'S**  
14           **PROPOSED RENEWABLE ENERGY PROGRAM?**

15    **A.**    My understanding is that the Company proposes a new voluntary program for  
16           interested non-residential customers that take service on KCP&L schedules Small  
17           General Service, Medium General Service, Large General Service, Large Power  
18           Service, Small General Service All-Electric, Medium General Service All-Electric, or  
19           Large General Service All-Electric and GMO schedules Small General Service, Large  
20           General Service, and Large Power Service.  The program would utilize a resource that

1 will be placed in service after January 1, 2019. See Direct Testimony of Bradley D.  
2 Lutz, page 18, line 18 to line 20 and Schedule BDL-2.

3 **Q. WHAT IS YOUR UNDERSTANDING OF THE MINIMUM QUALIFICATION FOR REP**  
4 **SERVICE?**

5 A. My understanding is that the Company proposes that a participating customer have  
6 an annual average peak demand over 200 kW, or upon Company approval, the  
7 customers with aggregated load of at least 2.5 MW and an average demand of 200  
8 kW per account, or Governmental/Municipal Customers, can combine accounts for  
9 participation. *Id.*

10 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED PROGRAM SIZE?**

11 A. My understanding is that the Company proposes a program limit of 200 MW to be  
12 applied to all of the Company's jurisdictions, including Kansas, with a minimum  
13 program size of 100 MW. The Company proposes to include the flexibility to re-  
14 evaluate the limit if the 200 MW level is reached. *Id.*

15 **Q. WHAT IS YOUR UNDERSTANDING OF HOW THE COMPANY PROPOSES TO**  
16 **ALLOCATE PROGRAM CAPACITY?**

17 A. My understanding is that the Company proposes to allocate program capacity on a  
18 first-come-first-served basis, with a waiting list for requests above the program limit.  
19 *Id.*

1 Q. WHAT IS YOUR UNDERSTANDING OF THE AMOUNT OF RENEWABLE ENERGY ABLE  
2 TO BE SUBSCRIBED BY A PARTICIPATING CUSTOMER?

3 A. My understanding is that the Company proposes to allow a participating customer  
4 to subscribe up to 100 percent of their annual energy usage. *Id.*

5 Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED VALUE  
6 PROPOSITION?

7 A. My understanding is that the Company proposes a Renewable Adjustment that, for  
8 each MWh of service, charges the difference between the Subscription Charge,  
9 which is the delivered renewable energy price plus the proposed administrative  
10 charge, and the market value of the electricity, inclusive of all market revenues and  
11 costs. *Id.* As such, if the market price of electricity is lower during a period than the  
12 Subscription Charge, the customer will pay a charge to the Company. On the other  
13 hand, however, if the market price of electricity is higher during a period than the  
14 Subscription Charge, then the customer will see a credit on their bill. My  
15 understanding is this is similar to the value proposition of the Ameren Missouri  
16 green tariff program recently approved by the Commission in Docket No. ET-2018-  
17 0063.

1 Q. IS IT YOUR UNDERSTANDING THAT THIS VALUE PROPOSITION IS IN ADDITION TO  
2 BILLING PER THE COMPANY'S STANDARD SERVICE TARIFFS?

3 A. Yes. Customers taking service under the Company's proposed REP will remain full  
4 requirements customers of the Company and continue to receive bills reflecting the  
5 Company's standard service tariffs. *Id.*

6 Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S PROPOSED PROGRAM  
7 SUBSCRIPTION TERM LENGTHS?

8 A. My understanding is that the Company has proposed subscription terms of 5, 10,  
9 and 20 years, and that customers subscribing to more than 20 percent of the  
10 program would be required to commit to a term of at least 10 years. *Id.*

11 Q. IS IT YOUR UNDERSTANDING THAT THE COMPANY PROPOSES TO TIE  
12 SUBSCRIPTION LENGTHS TO THE SUBSCRIPTION CHARGE?

13 A. Yes. My understanding is that the subscription length will affect the administrative  
14 charge portion of the subscription charge. The Company proposes an administrative  
15 charge of \$0.10/MWh for 20 year terms and \$0.30/MWh for the five and ten year  
16 terms. My understanding is that subscription length does not impact the delivered  
17 renewable energy price portion of the subscription charge. *Id.*

18 Q. IS IT YOUR UNDERSTANDING THAT THE PARTICIPATING CUSTOMER CAN CHOOSE  
19 TO RECEIVE THE RENEWABLE ENERGY CREDITS OR HAVE THE COMPANY RETIRE  
20 THE CREDITS ON THEIR BEHALF?

21 A. Yes. *Id.*

1       **Q.    WHAT IS YOUR UNDERSTANDING OF THE TRANSFER AND TERMINATION**  
2       **PROVISIONS?**

3       A.    My understanding is that the Company proposes to allow a participating customer  
4       who moves to another location within the Company’s service territory to transfer  
5       their subscription, subject to the subscription amount being less than the new load’s  
6       usage. The Company proposes that for a participating customer who chooses to  
7       leave the program entirely, the customer be responsible for “associated costs and  
8       administration” associated with the termination but notes that the costs may be  
9       adjusted if another customer assumes the renewable energy purchase obligation.  
10      Additionally, the Company proposes a 12 re-enrollment month stay out for  
11      customers who leave the program. *Id.*

12      **Q.    DOES THE COMPANY INCLUDE REMAINING RENEWABLE ENERGY COST IN**  
13      **“ASSOCIATED COSTS”?**

14      A.    Yes, though that statement is included in the “Availability” section of the proposed  
15      tariff, not the “Transfer or Termination” provision. *Id.*

16      **Q.    DOES THE COMPANY PROPOSE TREATMENT OF UNSUBSCRIBED ENERGY?**

17      A.    Yes. The Company proposes to incorporate any unsubscribed energy in to retail  
18      service, with the jurisdictional allocation of such based on subscriptions by  
19      jurisdiction. *Id.*

1 **MECG Comments and Recommendations**

2 **Q. WHAT IS MECG'S OVERALL IMPRESSION OF THE COMPANY'S PROPOSED REP AND**  
3 **RECOMMENDATION TO THE COMMISSION?**

4 A. Overall MECG commends the Company for its efforts to develop the program and  
5 finds the proposed REP to be well structured and likely to produce customer  
6 participation. MECG recommends that the Commission approve the REP with the  
7 modifications proposed herein.

8 **Q. DOES MECG BELIEVE THAT THE PROGRAM COULD BE DETRIMENTAL TO OTHER**  
9 **CUSTOMERS?**

10 A. No. Program subscriptions are in addition to the otherwise applicable tariffed  
11 service taken by participating customers, which maintains the current relationship of  
12 the Company's rates to recovery of the Company's cost of service. Additionally, the  
13 structure of the value proposition aligns program costs and program revenues and  
14 ensures that the costs of participation under full subscription are borne by  
15 participants. MECG recognizes that the Company does propose to charge all retail  
16 customers for unsubscribed energy and renewable energy credits, but proposes  
17 modifications below that should minimize the amount of unsubscribed energy  
18 during the program term.

19 **Q. WHAT IS MECG'S FIRST PROPOSED MODIFICATION?**

20 A. MECG proposes that the process to first enroll customers for a resource tranche of  
21 the program be done in such a way that all interested customers have an

1 opportunity to take service from the resource(s). As the Company's proposal reads,  
2 the Company will determine the interest level of eligible customers to size the  
3 resource(s), subject to a minimum of 100 MW and maximum of 200 MW, and apply  
4 resource(s) to customers on a first-come-first-served basis. Under this scenario, a  
5 customer who can consume the entire 200 MW of resource(s), if they are first in  
6 line, will receive the entirety of the program. While MECG ultimately wants every  
7 customer who desires to have 100 percent of their energy purchased from the  
8 Company to be renewable to be able to do so, the Company's proposed structure is  
9 a concern.

10 **Q. HOW DOES MECG RECOMMEND THE FIRST ENROLLMENT FOR A TRANCHE BE**  
11 **DONE?**

12 **A.** MECG recommends that the first enrollment utilize a two-step process: (1) as  
13 proposed by the Company, they should gauge interest from eligible and interested  
14 customers to size the resource(s) and (2) to the extent that the total of interest  
15 exceeds 200 MW, the Company should then size the allocations to each customer  
16 proportional to their interest.

17 **Q. PLEASE PROVIDE AN EXAMPLE.**

18 **A.** Assume the Company has four customers who have an interest in REP participation.  
19 Under both the Company's proposal and MECG's proposal, the Company will gauge  
20 customer interest, and the amounts are shown in Table 1 below:



**Table 1. REP Customer Interest.**

| Customer     | MW Interest |
|--------------|-------------|
| A – First    | 120         |
| B – Second   | 70          |
| C – Third    | 50          |
| D – Fourth   | 80          |
| <b>Total</b> | <b>320</b>  |

1  
2 Because of the 200 MW limit, the Company will need to limit the amounts awarded  
3 to customers. Per the Company’s proposal, the allocation would be performed as  
4 shown in Table 2 below:

**Table 2. Participant Allocation, Company Proposed.**

| Customer     | MW Interest | Allocation (MW) |
|--------------|-------------|-----------------|
| A – First    | 120         | 120             |
| B – Second   | 70          | 70              |
| C – Third    | 50          | 10              |
| D – Fourth   | 80          | 0               |
| <b>Total</b> | <b>320</b>  | <b>200</b>      |

5  
6 **Q. UNDER THIS SCENARIO, DOES THE COMPANY’S PROPOSAL RESULT IN SOME**  
7 **INTERESTED CUSTOMERS RECEIVING NO ALLOCATION?**  
8 **A. Yes. Customer D, who was fourth in line, received no allocation, and customer C,**  
9 **who was third, received only 20 percent of their request.**

1       **Q.     HOW WOULD THE ALLOCATION WORK UNDER MECG’S PROPOSAL?**

2       **A.     The allocation per MECG’s proposal is shown in Table 3 below:**

| <b>Customer</b> | <b>MW Interest</b> | <b>% of Total Interest</b> | <b>MECG Allocation (MW)</b> |
|-----------------|--------------------|----------------------------|-----------------------------|
| A – First       | 120                | 37.5                       | 75.0                        |
| B – Second      | 70                 | 21.9                       | 43.8                        |
| C – Third       | 50                 | 15.6                       | 31.2                        |
| D – Fourth      | 80                 | 25.0                       | 50.0                        |
| <b>Total</b>    | <b>320</b>         | <b>100</b>                 | <b>200</b>                  |

3

4       Under MECG’s proposed allocation, all customers who have initial interest in the  
5       tranche have an opportunity to participate.

6       **Q.     SHOULD PARTICIPATION IN THE FIRST TRANCHE PRECLUDE CUSTOMERS FROM**  
7       **FURTHER PARTICIPATION?**

8       **A.     No. MECG recommends that customers who do not receive their full interest in the**  
9       **first tranche have an opportunity to sign up to their full interest in later tranches or**  
10       **when another customer’s subscription term ends and is not renewed or is**  
11       **terminated and those MW are freed up. Additionally, MECG does not oppose the**  
12       **Company utilizing a first-come-first-served process for subscriptions that occur when**  
13       **another customer’s subscription term ends and is not renewed or is terminated and**  
14       **those MW are freed up.**

1       **Q.     DOES THE COMPANY’S PROPOSED REP INCLUDE A RENEWAL PROVISION?**

2       A.     No.  MECG recommends that the Commission approve the program with a renewal  
3           provision that gives the participating customer the option to renew its participation  
4           prior to offering that capacity to other customers.

5       **Q.     IS MECG CONCERNED THAT THE PROPOSED TERMS OF 5, 10, AND 20 YEARS ARE**  
6           **NOT SUFFICIENT TO MEET CUSTOMER INTEREST AND MINIMIZE UNSUBSCRIBED**  
7           **ENERGY?**

8       A.     Yes, particularly if a significant amount of the initial program participation is for five  
9           year terms, as there is no proposed term length that the Company can easily use to  
10          ensure the remaining 15 years of a 20 year PPA are subscribed.

11      **Q.     WHAT IS MECG’S RECOMMENDATION ON THIS ISSUE?**

12      A.     MECG recommends that the Commission approve the program with 5, 10, 15, and  
13          20 year terms available to participating customers.

14      **Q.     DOES MECG HAVE A CONCERN WITH THE COMPANY’S PROPOSED TRANSFER**  
15          **PROVISION?**

16      A.     Yes.  For multi-site customers, there may be an instance where the customer may  
17          need to close one site without opening a new site to replace it.  From both a  
18          financial and operational perspective, MECG believes it is important to include  
19          provisions under which the customer can transfer the subscription to other active  
20          accounts that are either not enrolled in the program or have less than their total  
21          eligible usage enrolled.

- 1       **Q.    WHAT IS MECG’S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**
- 2       A.    The Commission should approve the program with more flexible transfer terms.
- 3           MECG recommends that the Commission apply the transfer terms from the recently
- 4           approved Ameren Missouri renewable choice program to the Company’s REP. See
- 5           Docket No. ET-2018-0063, Second Non-Unanimous Stipulation and Agreement,
- 6           Exhibit A, Sheet 94.6, Section 5.
- 7       **Q.    DOES THIS CONCLUDE YOUR TESTIMONY?**
- 8       A.    Yes.

# Steve W. Chriss

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

---

## EXPERIENCE

July 2007 – Present

Walmart 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<br>B.S., Horticulture          |

## TESTIMONY BEFORE REGULATORY COMMISSIONS

2018

Kansas Docket No. 18-WSEE-328-RTS: In the Matter of the Joint Application of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Oregon Docket No. UE 335: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

North Dakota Case No. PU-17-398: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in North Dakota.

Virginia Case No. PUR-2017-00179: Application of Appalachian Power Company for Approval of an 100 Percent Renewable Energy Rider Pursuant to § 56-577 A 5 of the Code of Virginia.

Missouri Case No. ET-2018-0063: In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff.

New Mexico Case No. 17-00255-UT: In the Matter of Southwestern Public Service Company's Application for Revision of its Retail Rates Under Advice Notice No. 272.

Virginia Case No. PUR-2017-00157: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs for Residential and Non-Residential Customers.

Kansas Docket No. 18-KCPE-095-MER: In the Matter of the Application of Great Plains Energy Incorporated, Kansas City Power & Light Company, and Westar Energy, Inc. for Approval of the Merger of Westar Energy, Inc. and Great Plains Energy Incorporated.

North Carolina Docket No. E-7, Sub 1146: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Louisiana Docket No. U-34619: In Re: Application for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or/1994 General Orders.

Missouri Case No. EM-2018-0012: In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.

*2017*

Arkansas Docket No. 17-038-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire a Wind Generating Facility and to Construct a Dedicated Generation Tie Line.

Texas Docket No. 47461: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project.

Oklahoma Cause No. PUD 201700267: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Wind Catcher Energy Connection Project; A Determination There is Need for the Project; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the Project; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

Nevada Docket No. 17-06003: In the Matter of the Application of Nevada Power Company, d/b/a NV Energy, Filed Pursuant to NRS 704.110(3) and (4), Addressing Its Annual Revenue Requirement for General Rates Charged to All Classes of Customers.

North Carolina Docket No. E-2, Sub 1142: In the Matter of the Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Oklahoma Cause No. PUD 201700151: 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.

Kentucky Case No. 2017-00179: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2017 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; (4) an Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) an Order Granting All Other Requested Relief.

New York Case No. 17-E-0238: Proceeding on Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Niagara Mohawk Power Corporation for Electric and Gas Service.

Virginia Case No. PUR-2017-00060: Application of Virginia Electric and Power Company for Approval of 100 Percent Renewable Energy Tariffs Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

New Jersey Docket No. ER17030308: In the Matter of the Petition of Atlantic City Electric Company 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, for Approval of a Grid Resiliency Initiative and Cost Recovery Related Thereto, and for Other Appropriate Relief.

Texas Docket No. 46831: Application of El Paso Electric Company to Change Rates.

Oregon Docket No. UE 319: In the Matter of Portland General Electric Company, Request for a General Rate Revision.

New Mexico Case No. 16-00276-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice No. 533.

Minnesota Docket No. E015/GR-16-664: In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota.

Ohio Case No. 16-1852-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.

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-EI: In Re: Petition for Rate Increase by Florida Power & Light Company.

Minnesota Docket No. E-002/GR-15-816: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota.

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.

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.

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.

**Midwest Energy Consumers Group**  
**Exhibit SWC-1**

**Missouri Public Service Commission File Nos. ER-2018-0145 and ER-2018-0146**

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.

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.

**Midwest Energy Consumers Group**  
**Exhibit SWC-1**

**Missouri Public Service Commission File Nos. ER-2018-0145 and ER-2018-0146**

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.

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)

**Midwest Energy Consumers Group**  
**Exhibit SWC-1**

**Missouri Public Service Commission File Nos. ER-2018-0145 and ER-2018-0146**

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.

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

**2012**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2011*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*2010*

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

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

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

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

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

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

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

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

Public Service Commission of Utah Docket No. 09-035-15 *Phase II*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Utility Commission of Oregon Docket No. UE 217: In the Matter of PACIFICORP, dba PACIFIC POWER Request for a General Rate Revision.



Mississippi Public Service Commission Docket No. 2010-AD-57: In Re: Proposal of the Mississippi Public Service Commission to Possibly Amend Certain Rules of Practice and Procedure.

Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET SEQ.* and 8-1-2-42 (a); Authority to Defer Program Costs Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

Public Utility Commission of Texas Docket No. 37744: Application of Entergy Texas, Inc. for Authority to Change Rates and to Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2009-489-E: Application of South Carolina Electric & Gas Company for Adjustments and Increases in Electric Rate Schedules and Tariffs.

Kentucky Public Service Commission Case No. 2009-00459: In the Matter of General Adjustments in Electric Rates of Kentucky Power Company.

Virginia State Corporation Commission Case No. PUE-2009-00125: For acquisition of natural gas facilities Pursuant to § 56-265.4:5 B of the Virginia Code.

Arkansas Public Service Commission Docket No. 10-010-U: In the Matter of a Notice of Inquiry Into Energy Efficiency.

Connecticut Department of Public Utility Control Docket No. 09-12-05: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Arkansas Public Service Commission Docket No. 09-084-U: In the Matter of the Application of Entergy Arkansas, Inc. For Approval of Changes in Rates for Retail Electric Service.

Missouri Public Service Commission Docket No. ER-2010-0036: In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Public Service Commission of Delaware Docket No. 09-414: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15 *Phase I*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Oklahoma Corporation Commission Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

*2008*

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

*2007*

Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

*2006*

Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

*2005*

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

*2004*

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

**TESTIMONY BEFORE LEGISLATIVE BODIES**

*2018*

Regarding Missouri Senate Bill 564: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 10, 2018.

*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, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.

Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.

Panelist, The Past, Present, and Future of Renewable Energy: What Role Will PURPA, Mandates, and Collaboration Play as Renewables Become a Larger Part of Our Energy Mix?, 36<sup>th</sup> National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.

Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.

Panelist, Getting to Yes with Large Customers to Meet Sustainability Goals, The Edison Foundation Institute for Electric Innovation Powering the People, March 7, 2018.

**Midwest Energy Consumers Group**  
**Exhibit SWC-1**  
**Missouri Public Service Commission File Nos. ER-2018-0145 and ER-2018-0146**

- Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.
- Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.
- Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.
- Panelist, Energy and Climate Change, 2017-18 Arkansas Law Review Symposium: Environmental Sustainability and Private Governance, Fayetteville, Arkansas, October 27, 2017.
- Panelist, Customer – Electric Company – Regulator Panel, Edison Electric Institute Fall National Key Accounts Workshop, National Harbor, Maryland, October 12, 2017.
- Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.
- Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.
- Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.
- Panelist, Transitioning Away from Traditional Utilities, Utah Association of Energy Users Annual Conference, Salt Lake City, Utah, May 18, 2017.
- 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.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

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.