

Exhibit No.:
Issue(s): Renewable Choice
Witness: Steve W. Chriss
Sponsoring Party: Walmart Inc.
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ET-2018-0063

SURREBUTTAL TESTIMONY OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

JUNE 8, 2018

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

2 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St.,
3 Bentonville, AR 72716-0550. I am employed by Walmart Inc.¹ as Director, Energy
4 and Strategy Analysis.

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

6 A. I am testifying on behalf of Walmart Inc. (“Walmart”).

7 **Q. ARE YOU THE SAME STEVE W. CHRISS WHO TESTIFIED EARLIER IN THIS**
8 **PROCEEDING?**

9 A. Yes.

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

11 A. The purpose of my testimony is to respond to the rebuttal testimony of Office of
12 Public Counsel (“OPC”) witness Geoff Marke. Walmart continues to support the
13 Stipulation and Settlement Agreement (“Agreement”) between Walmart, Ameren
14 Missouri (“Ameren”), the Missouri Department of Economic Development – Division
15 of Energy, Missouri Industrial Energy Consumers, Wind on the Wires, the Natural
16 Resources Defense Council, the Sierra Club, Renew Missouri, and the Missouri Public
17 Service Commission Staff.

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

1 **Q. DOES OPC OPPOSE THE GREEN TARIFF BEING OFFERED AS A REGULATED**
2 **OFFERING?**

3 A. Yes. OPC prefers that the program be offered by Ameren as a non-tariffed offering
4 or by a non-regulated affiliate, and in either case with no Commission approval or
5 oversight. *See* Rebuttal Testimony of Geoff Marke, page 2, line 20.

6 **Q. DOES WALMART AGREE WITH THIS POSITION?**

7 A. No, for two primary reasons. First, the mechanics are not clear for how Ameren’s
8 regulated business could deliver a non-tariffed product, with no Commission
9 approvals or oversight, to interested customers, or how this would meet any public
10 interest standard and not expose customers to larger risks than those contemplated
11 by OPC in their testimony.

12 **Q. WHAT IS THE SECOND REASON?**

13 A. The second reason is that one of the factors that makes Ameren’s program
14 attractive is the ability for the Company, as a utility, to leverage its status as the
15 existing provider of electricity and their key account executive relationships to
16 engage and aggregate customers from its retail customer base to drive economies of
17 scale for the program greater than any single customer who would consider
18 participating could achieve alone. This will very likely reduce program costs and
19 certainly increase renewable access opportunities for Ameren’s commercial and
20 industrial customers. It is not clear how an un-regulated affiliate, which does not

1 have the same customer acquisition abilities or relationship with customers, could
2 accomplish this.

3 **Q. DOES WALMART PARTICIPATE IN UTILITY-ADMINISTERED LARGE SCALE**
4 **RENEWABLE PROGRAMS?**

5 A. Yes. As I noted in my direct testimony, to date we have engaged in two utility-
6 administered large scale renewable programs. These programs are Georgia Power’s
7 177 MW Commercial & Industrial Renewable Energy Development Initiative
8 program,² of which Walmart will off-take 83.3 MW of solar energy, and Alabama
9 Power’s 72 MW solar farm in Alabama.³ These programs are both regulated
10 offerings and were enabled and successful because of the relationship Georgia
11 Power and Alabama Power have with Walmart through their key account programs.
12 While Ameren’s program has some operational differences from the programs in
13 Georgia and Alabama, the unifying theme is that successful program development
14 and deployment is enabled by the utilities working with their customers towards a
15 common goal.

16 In total, the Commission should reject OPC’s proposal and instead approve
17 the stipulation as filed.

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

19 A. Yes.

² <https://www.greenbiz.com/article/how-google-and-walmart-work-utilities-procure-clean-power>

³ <http://www.alabamane.wscenter.com/2018/01/02/chambers-county-solar-project-now-serving-alabama-power-customers/>